

Compliance Assessment Report

Report ID:
CAR_NRW0031151

This form will report compliance with your permit as determined by an NRW officer

Site	Port Talbot Steel Works EPR/BL7108IM	Permit Ref	BL7108IM		
Operator/Permit holder	Tata Steel UK Limited				
Regime	Installations				
Date of assessment	04/10/2016	Time in	14:00	Out	16:30
Assessment type	Audit				
Parts of the permit assessed	1 Management; 2 Operations; 3 Emissions and Monitoring; 4 Information				
Lead officer's name	Broom, Mark				
Accompanied by	Cowie, Douglas				
Recipient's name/position	Fiona Abbott/ Environment Manager	Date issued	17/02/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Site description

Tata Steel UK Ltd (Tata) operates an integrated iron and steel works at Port Talbot, Neath Port Talbot. The site is permitted as an installation under the Environmental Permitting Regulations (EPR). The steelworks has several identifiable permitted processes which are carried out sequentially across the installation to convert raw iron ores and coal to semi finished (slab) and finished steel products (such as hot rolled, pickled and oiled, cold rolled and annealed). The permit also covers coke making and the reception, stockpiling and blending of raw iron making materials. Three other companies, Cambrian Stone, Harsco Metals and ICL, undertake separately-permitted slag handling, iron plating and cold mill effluent treatment activities at the steelworks on Tata's behalf.

Purpose of visit/assessment

This inspection focused on the Basic Oxygen Steelmaking (BOS) Plant and the improvements made by Tata to its emissions abatement systems. Additional matters in relation to potential plant enhancements and life extensions, emissions monitoring and environmental reporting were also discussed.

The relevant permit conditions are listed under Sections 1.1, 2.1, 2.3, 3.5 and 4.2 of Tata's permit.

Person(s) present

Tata Steel

Fiona Abbott

Andrew Townsend

Jamie-Ross Landeg

Jason Massey

Chris Court (BOS)

NRW

Mark Broom

Doug Cowie

BOS Plant

The Secondary Fume Extraction Plant (FEP) at the BOS (Steel) plant has seen significant investment by Tata to meet the requirements of the EC Industrial Emissions Directive (IED). Tata chose AAF as the overseeing project contractor for the design, build and installation of the new equipment and upgrades.

The BOS Secondary FEP consists of five fans and associated bag filters: Fan 3, 3A, 4, 5 and 6. Fans 3 and 3A serve the Hot Metal Pouring (HMP) Bays. There are two pouring pits (north and south) that can receive molten iron torpedoes from either of two rail lines (east and west). Fans 4, 5 and 6 receive and filter the secondary fumes that escape from the mouth of the two operational BOS converters.

The project has included:

- Filtration capacity extension to Fan 3 with structural capability to increase further – an increase from 6 compartments to 8 with space for a further compartment.
- A new travelling hood in the HMP Bay to serve both torpedo lines and both pouring pits.
- Ring main conversion work to allow more flexible FEP operation
- Adding extra ducting to make the secondary fume system a ring main
- New compressed air capability for Fans 3 and 3A
- Overhaul of pulse cleaning on all 5 fan filters
- New drives and motors for fans 5 and 6
- 12 replacement dampers to adjust fume collection depending on plant operations. These dampers change positions to ensure that the suction required for each operation across the BOS plant matches the fume generating potential (cyclical dynamic control).

The photos below show sections of the new filtration capacity for Fan 3. The centre and right-hand photos show there is space within the new structure for additional capacity that can be added at a later date.



Below is a photo of the new travelling hood at the HMP Bay. The two pouring pits are situated to the left and right of the hood and the two rail lines are in front of and behind the hood. The existing hood can be seen in the far left of the photo. The new hood weighs around 50tonne and is moved into position by an overhead gantry crane. The hood design reduces air gaps and enables all pouring pit fumes to be captured more effectively. It also has reinforced stainless steel protection near the pouring area and additional refractory protection has been sprayed on the north pouring slot (which is used more frequently).



The total cost of this project is around £2m. the project is reaching its final stages and once complete will allow the BOS Secondary FEP to meet the 10 mg/m³ daily mean BAT-AEL for particulates. There remain some challenges to overcome, for example aligning the HMP Bay hood accurately, but the project is expected to be complete by the end of November 2016.

NRW and previously Environment Agency Wales started discussions with Tata over 5 years ago regarding the implementation of the IED and Iron and Steel BAT Conclusions. This project has taken a number of years to come to fruition and it should enable Tata to consistently meet the relevant BAT-AELs for BOS

Plant operations. The work will also contribute to Port Talbot steelworks' overall ability to meet the IED requirements.

Other matters

Tata are looking at options to improve the generating capability of their existing power plants. One option could be to install a more efficient steam turbine. It is not clear if the EC Energy Efficiency Directive (EED) applies in this case. Tata should discuss this issue further with NRW when the plans are better defined.

Blast Furnace No.5 was blown in at the start of 2003 – over 12 years ago. Since then there has been periodic work carried out to extend its working or 'campaign' life. Blast furnaces typically need increasing amounts of maintenance on their refractory linings, tuyeres etc. the longer an operational campaign lasts. Furnace No.5 has recently been brought back online after a significant repair to the throat of the furnace. Tata are now looking at options for this furnace to extend its current operational campaign and the company should discuss this issue with NRW when the plans are better defined.

The monitoring requirements for particulates at emission point A63 (BOS Plant CASOB/Desulph FEP) was queried by Tata. Currently the emission limit value (ELV) is 15mg/m³ as a daily mean. NRW understands that the CASOB (secondary steel making) unit is currently non-operational and therefore no monitoring data has been generated during 2016. NRW is content for a short explanation to be provided with Tata's annual monitoring return to confirm the situation. The monitoring arrangements at A63 can be discussed further during our next compliance inspection at the BOS Plant and Secondary Steelmaking.

There appears to be a quarterly reporting requirement in Table S3.10 of Tata's permit:

Table S3.10 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
A record of environmental/operational parameters related to throughput shall be made and reported	-	Quarterly	-	-

This reporting frequency is inconsistent with the approach adopted since NRW issued a revised and consolidated permit (V014) for the steelworks in 2015. The principle being followed is to report once to the regulator and use the data and information many times. The wording in Table S3.10 will be corrected as part of the next permit variation to reflect the annual reporting requirements for environmental performance (Section 4.2 Reporting). NRW does not require quarterly reports/returns from Tata other than those required for Large Combustion Plant (LCP), on-site air quality monitoring and waste movements.

[ENDS]

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EPR Compliance Assessment Report

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Site	Port Talbot Steel Works EPR/BL7108IM	Permit Ref	BL7108IM
Operator/Permit holder	Tata Steel UK Limited	Date	04/10/2016

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.