

Compliance Assessment Report

Report ID:
CAR_NRW0024806

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	05/07/2016	Time in	14:00	Out	17:00
Assessment type	Audit				
Parts of the permit assessed	CAPEX				
Lead officer's name	Broom, Mark				
Accompanied by	Cowie, Douglas				
Recipient's name/position	Fiona Abbott/ Environment Manager	Date issued	19/09/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - General Management - Management system and operating procedures	A	
F2 - Amenity - Noise	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	
H1 - Resource Efficiency - Efficient use of raw materials	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

Fiona Abbott (CAPEX)

Jason Heatman (CAPEX)

Jamie-Ross Landeg (PRTR)

Stuart Lloyd (CAPEX)

Oliver Mullan (CAPEX)

Ryan Lipscomb (CAPEX)

Gareth Davies (CAPEX)

Mark Broom

Doug Cowie

Pollution Release and Transfer Register (PRTR)

A review of the Tata Steel's PRTR submission for 2015 was carried out. NRW no longer collects the full set of Pollution Inventory (PI) data via the Environment Agency's online PIEDC system. Instead NRW will collect emission data required for the European Pollutant Release and Transfer Register (E-PRTR) and the data required for the National Atmospheric Emissions Inventory (NAEI).

Tata's review spreadsheet showed some issues with its PRTR data – some appeared to be omissions, some

data input errors. These were reviewed with Tata and a modified spreadsheet will be submitted to NRW with comments alongside each point. On receipt of this amended submission we should be able to verify Tata's 2015 data.

CAPEX update

A number of projects are suspended until the outcome over the future of Tata Steel UK is known or decided. Some approved projects are progressing which include the sinter plant refurbishment work and lignite-lime injection. These two interlinked projects will reduce the particulate levels down to below 40mg/m³ as a daily mean and the dioxin levels down to below 0.4 ng/m³ as a discontinuous (spot) sample. The key aspects of the sinter plant work are to minimise air ingress and to maximise the efficiency of the Electrostatic Precipitators (ESPs) over the next two major stops – October 2016 and March 2017. This is a key enabling project that needs to happen before the lignite-lime injection system can be commissioned.

A number of the air ingress areas are being targeted in the October shutdown and some preparatory work for the ESPs will be carried out at the same time. Monthly monitoring of air ingress is being carried out to inform the scope of the work. The dust conveyors below the north ESP will either be replaced or be prepared to be replaced; the uncertainty is due to the amount of crane work that is required and the possible delays due to high winds stopping the lifts.

Sinter stocks and reduced sinter in the BF burdens will be planned in to enable the sinter plant to be offline for up to 6 weeks but allow the blast furnaces to continue producing iron. During the March 2017 shutdown, the sinter plant will be run on one fan - one ESP operation for up to 10 days while major work is carried out on the other ESP. This work will bring in 'power-off' rapping (see previous CARs NRW0017534 and 6093). Currently there are 6 electrical fields in the South ESP and 8 fields in the north ESP. When the dust is collected within each field it is removed by knocking or rapping the field while the power remains on, which reduces the effectiveness of the dust removal. When power off rapping comes in the power is interrupted to the field when the dust is rapped off. As each existing field is split into two, the proportion of the field being taken offline for rapping is smaller than it would be if the whole field were to be taken off for rapping. This optimises the system and allows an increased amount of dust to be rapped and collected.

The north ESP needs significant internal work due to the air ingress causing turbulence and damage to the last power field and some lesser damage to the next to last field. These repairs require part of the top of the north ESP to be removed and the internal fittings replaced from above. There is also some damage and corrosion to the area where the ESP meets the tops of the dust collectors in the South ESP. These areas need to be repaired from the inside.

Before power-off rapping, fields always power on even during dust removal:

North ESP	South ESP
1	1
2	2
3	3
4	4

5	5
6	6
	7
	8

After power-off rapping (ESP functional):

North ESP		South ESP	
1L	1R	1L	1R
2L	2R	2L	2R
3L	3R	3L	3R
4L	4R	4L	4R
5L	5R	5L	5R
6L	6R	6L	6R
		7L	7R
		8L	8R

During power-off rapping (one field (2L) disabled for dust removal)

North ESP		South ESP	
1L	1R	1L	1R
2L	2R	2L	2R
3L	3R	3L	3R
4L	4R	4L	4R
5L	5R	5L	5R
6L	6R	6L	6R
		7L	7R
		8L	8R

As extra control systems, transformers and cabling are needed on top of each ESP, some roof strengthening will be required to ensure that the roofs can take the additional loads.

Although some parts of the wind main were replaced during the initial major sinter plant shutdowns, some ducts now require over plating and remedial work. The areas at the front end of the strand show some signs of increased abrasion and erosion, possibly due to hot material falling from the sides of the sinter strand above the wind main. These areas will be repaired with ceramic plate to help reduce the rate of erosion and therefore reduce the risk of air ingress into the system. Tata is also using thermal imaging to examine the insides of the wind main and drop-out boxes for deposits that could cause increased erosion and corrosion rates.

The last project that is already approved by Tata Steel is the hydro cyclone for BF5. This should be complete during Q3/Q4 this year. The dust cyclone on BF4 is now being operated at a reduced efficiency to

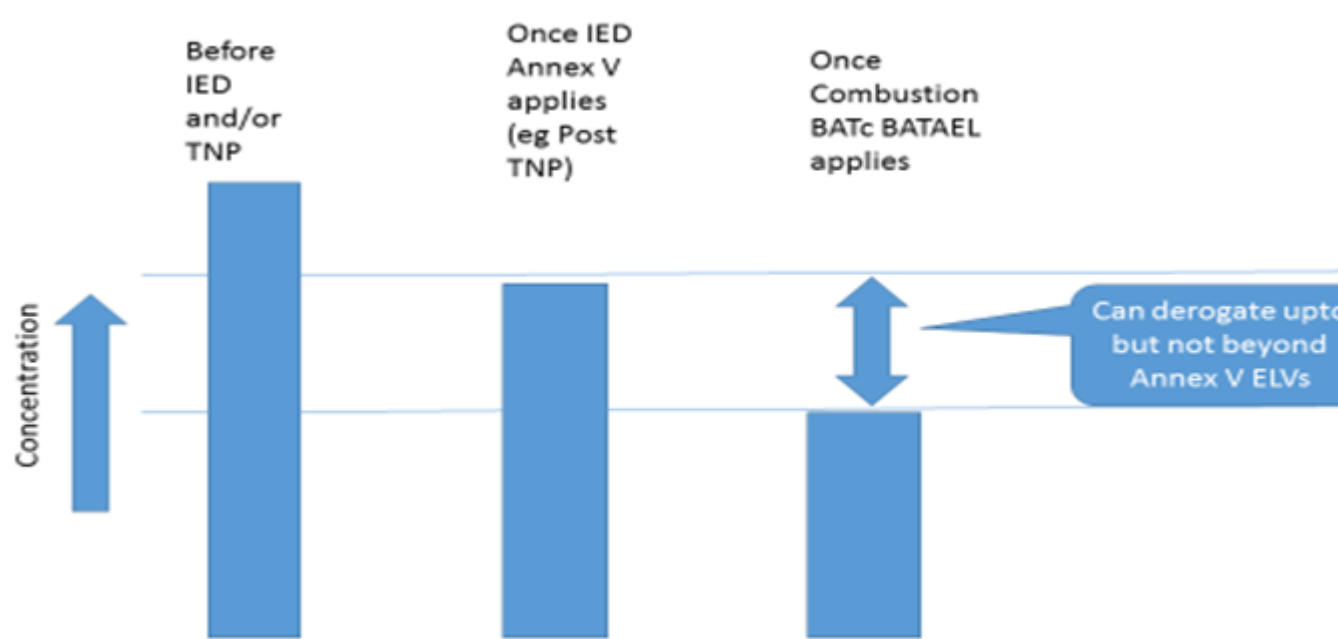
help reduce chloride loading into the sintering process (reduced chloride levels in the sinter burden help reduce the levels of other pollutants in the sinter main stack emissions). The hydro cyclone on BF5 will also help with this issue.

During our visit we noted that the sinter plant fans were generating a low-frequency sound which was resonating inside the project offices (portacabins) located next to the sinter plant office block. This appeared to be particularly noticeable just after the fans had started up at 15.25hrs. Outside the offices we observed considerable vibration affecting the metal cladding of some structures near the sinter main stack. NRW has received complaints about ongoing low-frequency noise from the steelworks during 2015 and 2016. We will consider our observations as part of our ongoing investigation into this issue.

Large Combustion Plant (LCP) discussions

Article 15(4) of the Industrial Emissions Directive (IED) sets the Emission Limit Values (ELVs) for combustion plant with IED Annex V as the backstop for performance of combustion plant post-Transitional National Plan (TNP).

When the combustion plant BAT conclusions are applied, then the operator can apply for a derogation up to but not above the Annex V ELVs.



The final draft BAT conclusions for combustion plant outlined in the combustion plant BRef note have annual mean limits and daily mean limits. IED Annex V specifies a daily mean, monthly mean and an annual mean limit for the 95th percentile of hourly means. The table below shows the interrelationship between IED Annex V and the draft Combustion BATc BATAELs:

	Annex V IED	Combustion BATc	Combined compliance
Daily mean	✓	✓	✓

Monthly mean	✓		✓
95 th percentile of hourly means in a year	✓		✓
Annual mean		✓	✓

The final draft of the combustion plant BREF is now available from the following link–

http://eippcb.jrc.ec.europa.eu/reference/BREF/LCP_FinalDraft_06_2016.pdf

The next step is for the draft to go to the Article 13 Forum for formal opinion before it goes to the Article 75 Committee for a qualified majority voting on the BAT Conclusions. The inspecting officers will keep Tata Steel informed of any further significant developments.

EPR Compliance Assessment Report

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Operator/Permit holder	Tata Steel UK Limited	Date	05/07/2016

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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.