Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID: CAR_NRW0027092

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	30/06/2016	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	3 Emissions and Monitoring; 4 Information				
Lead officer's name	Cowie, Douglas				
Accompanied by					
Recipient's name/position	Jason Heatman/ Senior Environmental Engineer	Date issued	21/02/2017		

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 - Infrastructure - Specified by permit	A	
C2 - Infrastructure - Management system and operating procedures	A	
E1 - Infrastructure - Air	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
	C3	3.1.2 Emissions to air
E3 - Infrastructure - Surface water	C3	3.1.2 Emissions to water
G2 - Infrastructure - Records of activity, site diary/journal/events	A	
G4 - Infrastructure - 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	**10**	**Total compliance score** (see section 5 for scoring scheme)	40

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

Condition 4.3.1(a) of permit BL7108IM requires the operator to inform Natural Resources Wales (NRW) in the event that the operation of the (permitted) activities gives rise to an incident or accident which significantly affects or may significantly affect the environment.

Condition 4.3.1(b) of permit BL7108IM requires the operator to inform NRW in the event of a breach of any permit condition.

Condition 4.3.2 specifies that any information provided under condition 4.3.1 where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in Schedule 5 to this permit within the time period specified in that schedule.

Schedule 5 of the permit outlines the information that the operator must provide and is divided into Part A and Part B. The schedule provides a framework/template for informing and/or notifying NRW in accordance with the requirements of condition 4.3.1.

Condition 3.1.2 requires that the limits given in Schedule 3 of the permit (point source emissions) shall not be exceeded.

The following operator notifications have been received concerning breaches/exceedances, incidents or accidents which occurred or were notified to us during Quarter 2 2016 (01 April – 30 June):

<u>Sinter Plant</u>

1. S5N/16/11 received on 11/04/16 – A1 Sinter Plant Main Stack
2. S5N/16/12 received on 18/04/16 – A1 Sinter Plant Main Stack
3. S5N/16/16 received on 25/04/16 – A1 Sinter Plant Main Stack
4. S5N/16/20 received on 03/05/16 – A1 Sinter Plant Main Stack
5. S5N/16/25 received on 09/05/16 – A1 Sinter Plant Main Stack
6. S5N/16/28 received on 16/05/16 – A1 Sinter Plant Main Stack
7. S5N/16/31 received on 23/05/16 – A1 Sinter Plant Main Stack
8. S5N/16/33 received on 31/05/16 – A1 Sinter Plant Main Stack

9. S5N/16/38 received on 06/06/16 – A1 Sinter Plant Main Stack
10. S5N/16/41 received on 13/06/16 – A1 Sinter Plant Main Stack
11. S5N/16/44 received on 20/06/16 – A1 Sinter Plant Main Stack

BOS Plant

1. S5N/16/13 received on 19/04/16 – A14 BOS Plant Secondary FEP North
2. S5N/16/14 received on 19/04/16 – A16 BOS Plant Secondary FEP South
3. S5N/16/15 received on 20/04/16 – A10 BOS Plant Hot Metal Pouring FEP
4. S5N/16/17 received on 25/04/16 – A14 BOS Plant Secondary FEP North
5. S5N/16/18 received on 25/04/16 – A16 BOS Plant Secondary FEP South
6. S5N/16/19 received on 03/05/16 – A14 BOS Plant Secondary FEP North
7. S5N/16/26 received on 09/05/16 – A14 BOS Plant Secondary FEP North
8. S5N/16/27 received on 09/05/16 – A16 BOS Plant Secondary FEP South
9. S5N/16/29 received on 16/05/16 – A14 BOS Plant Secondary FEP North
10. S5N/16/30 received on 16/05/16 – A16 BOS Plant Secondary FEP South
11. S5N/16/32 received on 23/05/16 – A16 BOS Plant Secondary FEP South
12. S5N/16/34 received on 31/05/16 – A16 BOS Plant Secondary FEP South
13. S5N/16/36 received on 06/06/16 – A14 BOS Plant Secondary FEP North
14. S5N/16/37 received on 06/06/16 – A16 BOS Plant Secondary FEP South
15. S5N/16/42 received on 13/06/16 – A14 BOS Plant Secondary FEP North
16. S5N/16/43 received on 13/06/16 – A16 BOS Plant Secondary FEP South
17. S5N/16/45 received on 20/06/16 – A16 BOS Plant Secondary FEP South
18. S5N/16/46 received on 28/06/16 – A14 BOS Plant Secondary FEP North
19. S5N/16/47 received on 28/06/16 – A16 BOS Plant Secondary FEP South
20. S5N/16/48 received on 28/06/16 – A10 BOS Plant Hot Metal Pouring FEP

Surface waters

1. S5N/16/21 received on 03/05/16 – W1 Long Sea Outfall
2. S5N/16/22 received on 03/05/16 – W3 Abbey Beach Outfall
3. S5N/16/35 received on 31/05/16 – W1 Long Sea Outfall

Coke Ovens

1. S5N/16/23 received on 03/05/16 – A54 Morfa Coke Oven Batteries
2. S5N/16/24 received on 03/05/16 – A56 Ministerstein (3 flues)
3. UR/16/49 received on 04/07/16 – A54 Morfa Coke Oven Batteries

Blast Furnaces

1. S5N/16/39 received on 25/05/16 – A4A Blast Furnace 4 bleeders
2. S5N/16/40 received on 06/06/16 – A4A Blast Furnace 4 bleeders
3. NRW ref 1603422 received on 11/08/16 – A5A Blast Furnace 5 bleeders

Compliance assessment

Sinter Plant

S5N/16/11: Schedule 1 Part A received 11 April 2016 (by email)

Daily mean (average) for particulates recorded at emission point A1:

09/04/2016: 40.80mg/m3

A1: Sinter plant main stack

Permitted limit is 40.00mg/m3 as a daily mean

The operator has specified that a measurement uncertainty factor of +/- 30% should be applied to the reported results.

Part A operator comment: *This is a new limit and this has been discussed at length with the NRW. Significant project work has been completed and planned ahead in order to comply with this limit and a plan will be submitted to the NRW in due course.*

After applying the appropriate measurement uncertainty factor, this marginal exceedance remains within the permitted limit of 40.00mg/m3. No non-compliance (CCS) score has been applied to this particular event.

S5N/16/12: Schedule 1 Part A received 18 April 2016 (by email)

Daily mean (average) for particulates recorded at emission point A1:

16/04/2016: 60.20mg/m3
17/04/2016: 44.80mg/m3

A1: Sinter plant main stack

Permitted limit is 40.00mg/m3 as a daily mean

The operator has specified that a measurement uncertainty factor of +/- 30% should be applied to the reported results.

Part A operator comment: *This is a new limit and this has been discussed at length with the NRW. Significant project work has been completed and planned ahead in order to comply with this limit and a plan will be submitted to the NRW in due course.*

NRW has not received any Schedule 5 Part B information from the operator for these exceedances. We have however discussed the introduction of this new daily mean ELV for particulates at A1 during other compliance interventions in 2016. NRW's findings are detailed in **CAR_NRW0017534, CAR_NRW0024806, CAR_NRW0025274** and **CAR_NRW0026798**.

Following discussion with the operator during March 2016, NRW agreed to accept a weekly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV at A1. This is confirmed in our email to Tata dated 16 March 2016.

After applying the appropriate measurement uncertainty factor, the exceedance recorded at A1 on 16/04/2016 remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all notified exceedances of this ELV during Quarter 2 (April – June) 2016 under a single CCS3 score for S5N/16/12 confirmed above, in line with Annex 3 of our Compliance Classification Scheme [CCS] (version 3, 26 March 2013). The notifications for A1 which have been consolidated are listed below:

S5N/16/16 received on 25/04/16
S5N/16/20 received on 03/05/16
S5N/16/25 received on 09/05/16
S5N/16/28 received on 16/05/16
S5N/16/31 received on 23/05/16
S5N/16/33 received on 31/05/16
S5N/16/38 received on 06/06/16
S5N/16/41 received on 13/06/16

S5N/16/44 received on 20/06/16

BOS Plant

S5N/16/13: Schedule 1 Part A received 19 April 2016 (by email)

Daily mean (average) for particulates recorded at emission point A14:

11/03/2016: 16.20mg/m3
12/03/2016: 19.02mg/m3
13/03/2016: 20.54mg/m3
14/03/2016: 21.45mg/m3
15/03/2016: 16.93mg/m3
16/03/2016: 20.75mg/m3
17/03/2016: 19.03mg/m3
18/03/2016: 20.95mg/m3
19/03/2016: 23.94mg/m3
20/03/2016: 22.47mg/m3
26/03/2016: 15.45mg/m3
27/03/2016: 15.90mg/m3
28/03/2016: 17.65mg/m3
30/03/2016: 19.16mg/m3
31/03/2016: 15.11mg/m3
01/04/2016: 16.93mg/m3
02/04/2016: 15.77mg/m3
03/04/2016: 15.42mg/m3
10/04/2016: 17.81mg/m3
11/04/2016: 20.59mg/m3
12/04/2016: 26.66mg/m3
13/04/2016: 15.85mg/m3
14/04/2016: 15.31mg/m3
15/04/2016: 20.53mg/m3
16/04/2016: 24.83mg/m3
17/04/2016: 23.32mg/m3
18/04/2016: 16.08mg/m3

A14: BOS Plant Secondary FEP North

Permitted limit is 15.00mg/m3 as a daily mean

The operator has specified that a measurement uncertainty factor of +/- 6.1% should be applied to the reported results.

Part A operator comment: *These are new limits on the emission point with the new permit that are significantly lower. New CEM tags have been set up to monitor this emission point, the new tags follow the same trend line as the original tags however are significantly higher, there is an investigation underway to determine whether these are monitor/ tag error. It is for this reason the data has been backdated and the breaches have been recognised.*

The operator subsequently provided a Schedule 5 Part B notification containing the following additional information and representations:

There has been a significant amount of bag improvement work done on fan 4 (A14) along with fan 6 (A16). During this period fan 5 (A15) has also been offline for the same maintenance (as seen within timeline provided by Tata Steel). The breaches for A14 and A16 have been attributed to a number of factors: Fan 5 being down for maintenance has resulted largely in A14 and A16 dealing

with the increase in gas volume through their systems. This is in addition to both having reduced capability associated with their respective bag filter systems due to the significant improvement work noted above. For fan 6 the improvement work is still on going with dye tests throughout the separate compartments and bag changes/ upgrades.

During the period of maintenance, bag compartments were segregated in fans 4 and fan 6 and compromised bags were replaced following the dye test inspections. It has been highlighted that there was an opportunity to make an improvement with an upgrade in bag design and subsequently the bags replaced with a more durable Kevlar bag for improved performance.

We have discussed the introduction of this new daily mean ELV for particulates at A14 during other compliance interventions in 2016. NRW's findings are detailed in **CAR_NRW0025273** and **CAR_NRW0031151**.

Following discussion with the operator during March 2016, NRW agreed to accept a weekly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV at A14. This is confirmed in our email to Tata dated 26 April 2016.

After applying the appropriate measurement uncertainty factor, the exceedances recorded at A14 on 11/03/2016 and 01/04/2016 remain non-compliant with the permit limit and Condition 3.1.2. **Two CCS Category 3 scores** have been recorded in response to these non-compliances (**one score per quarter**).

We have assessed and consolidated all notified exceedances of this ELV during Quarter 1 (January – March) and Quarter 2 (April – June) 2016 under two CCS3 scores for S5N/16/13 confirmed above, in line with Annex 3 of our Compliance Classification Scheme [CCS] (version 3, 26 March 2013). The notifications for A14 which have been consolidated are listed below:

S5N/16/17 received on 25/04/16
S5N/16/19 received on 03/05/16
S5N/16/26 received on 09/05/16
S5N/16/29 received on 16/05/16
S5N/16/36 received on 06/06/16
S5N/16/42 received on 13/06/16
S5N/16/46 received on 28/06/16

S5N/16/14: Schedule 1 Part A received 19 April 2016 (by email).

Daily mean (average) for particulates recorded at emission point A16:

12/03/2016: 16.56mg/m3
13/03/2016: 16.97mg/m3
14/03/2016: 16.65mg/m3
16/03/2016: 15.91mg/m3
19/03/2016: 17.68mg/m3
20/03/2016: 16.94mg/m3
16/04/2016: 17.33mg/m3
17/04/2016: 15.76mg/m3

A16: BOS Plant Secondary FEP South

Permitted limit is 15.00mg/m3 as a daily mean

The operator has specified that a measurement uncertainty factor of +/- 6.1% should be applied to the reported results.

Part A operator comment: *These are new limits on the emission point with the new permit that are*

significantly lower. New CEM tags have been set up to monitor this emission point, the new tags follow the same trend line as the original tags however are significantly higher, there is an investigation underway to determine whether these are monitor/ tag error. It is for this reason the data has been backdated and the breaches have been recognised.

The operator subsequently provided a Schedule 5 Part B notification containing the following additional information and representations:

There has been a significant amount of bag improvement work done on fan 4 (A14) along with fan 6 (A16). During this period fan 5 (A15) has also been offline for the same maintenance (as seen within timeline provided by Tata Steel dated 01/08/2016 RE: FEP Recovery Plan). The breaches for A14 and A16 have been attributed to a number of factors: Fan 5 being down for maintenance has resulted largely in A14 and A16 dealing with the increase in gas volume through their systems. This is in addition to both having reduced capability associated with their respective bag filter systems due to the significant improvement work noted above. For fan 6 the improvement work is still on going with dye tests throughout the separate compartments and bag changes/ upgrades.

During the period of maintenance, bag compartments were segregated in fans 4 and fan 6 and compromised bags were replaced following the dye test inspections. It has been highlighted that there was an opportunity to make an improvement with an upgrade in bag design and subsequently the bags replaced with a more durable Kevlar bag for improved performance. There is a planned stop for A16 from the 19th September expected to last between five to six weeks, the stop will include a drive upgrade and dependent on the delivery of new bags a full bag system change on those requiring it, such as undertaken by A15.

We have discussed the introduction of this new daily mean ELV for particulates at A16 during other compliance interventions in 2016. NRW's findings are detailed in **CAR_NRW0025273** and **CAR_NRW0031151**.

Following discussion with the operator during March 2016, NRW agreed to accept a weekly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV at A16. This is confirmed in our email to Tata dated 26 April 2016.

After applying the appropriate measurement uncertainty factor, the exceedances recorded at A16 on 12/03/2016 and 16/04/2016 remain non-compliant with the permit limit and Condition 3.1.2. **Two CCS Category 3 scores** have been recorded in response to these non-compliances (**one score per quarter**).

We have assessed and consolidated all notified exceedances of this ELV during Quarter 1 (January – March) and Quarter 2 (April – June) 2016 under two CCS3 scores for S5N/16/14 confirmed above, in line with Annex 3 of our Compliance Classification Scheme [CCS] (version 3, 26 March 2013). The notifications for A16 which have been consolidated are listed below:

S5N/16/18 received on 25/04/16
S5N/16/27 received on 09/05/16
S5N/16/30 received on 16/05/16
S5N/16/32 received on 23/05/16
S5N/16/34 received on 31/05/16
S5N/16/37 received on 06/06/16
S5N/16/43 received on 13/06/16
S5N/16/45 received on 20/06/16
S5N/16/47 received on 28/06/16

S5N/16/15: Schedule 5 Part A received 20 April 2016 (by email)

Daily mean (average) for particulates recorded at emission point A10:

30/03/2016: 29.60mg/m3

A10: BOS Plant Hot Metal Pouring Bay FEP

Permitted limit is 15.00mg/m3 as a daily mean

The operator has not specified the measurement uncertainty factor associated with the reported result due to a possible monitoring error – see below comment.

Part A operator comment: *An investigation is underway to determine the validity of the reading and whether a monitor error could be as a result of it, due to it being significantly higher than the usual level for that emission point.*

The operator subsequently provided a Schedule 5 Part B notification containing the following additional information and representations:

Breach days and nature of elevated emissions:

30/03/2016 – *Fan suction poor due to 3A being offline for upgrades. Bags full resulting in consistently high readings all day, issue identified and fan put on cleaning cycle. Back in compliance following day.*

There is significant work on going to improve the bag filter system for fan 3 (A10). It will see the installation of more bag filters for the ongoing improvement of the filter system for A10.

We have discussed the introduction of this new daily mean ELV for particulates at A10 during other compliance interventions in 2016. NRW's findings are detailed in **CAR_NRW0025273** and **CAR_NRW0031151**.

After applying the appropriate measurement uncertainty factor, this exceedance remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

No consolidation of scores for exceedances at A10 during Quarter 1 (January – March) 2016 has been necessary.

S5N/16/48: Schedule 5 Part A received 28 June 2016 (by email)

Daily mean (average) for particulates recorded at emission point A10:

21/06/2016: 15.41mg/m3
23/06/2016: 44.54mg/m3

A10: BOS Plant Hot Metal Pouring Bay FEP

Permitted limit is 15.00mg/m3 as a daily mean

The operator has specified that a measurement uncertainty factor of +/- 6.1% should be applied to the reported results.

Part A operator comment: *Breaches identified by environmental department, email sent to relevant personnel within the BOS Plant to investigate cause of the emission. An investigation has been underway to check if the readings were as a result of emissions and not any other influence. A notification has been raised to the shift teams to check the integrity of the internal bags.*

The operator subsequently provided a Schedule 5 Part B notification containing the following additional information and representations:

Breach days and nature of elevated emissions:

21st and 23rd June 2016 – Fan suction poor due to fan 3A being offline for upgrades. It has been noted that fans 3 and 3A silos are cleaned weekly of material on Tuesday and Thursdays. It has been identified that this process will disturb material, elevating emissions with the potential to breach. This is an abnormal condition outside of normal operation.

There is significant work on going to improve the bag filter system for fan 3 (A10). It will see the installation of more bag filters for the ongoing improvement of the filter system for A10.

We have discussed the introduction of this new daily mean ELV for particulates at A10 during other compliance interventions in 2016. NRW's findings are detailed in **CAR_NRW0025273** and **CAR_NRW0031151**.

After applying the appropriate measurement uncertainty factor, the exceedance recorded at A10 on 23/06/2016 remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

No consolidation of scores for exceedances at A10 during Quarter 2 (April – June) 2016 has been necessary.

Surface water

S5N/16/21: Schedule 5 Part A received 3 May 2016 (by email)

Weekly average for suspended solids recorded at emission point W1:

03/04/2016 – 09/04/2016: 44.60mg/l
24/04/2016 – 01/05/2016: 24.60mg/l

S5N/16/35: Schedule 5 Part A received 3 May 2016 (by email)

Weekly average for suspended solids recorded at emission point W1:

01/05/2016 – 07/05/2016: 60.00mg/l
08/05/2016 – 14/05/2016: 34.90mg/l
15/05/2016 – 21/05/2016: 28.30mg/l
22/05/2016 – 28/05/2016: 40.90mg/l

W1: Long Sea Outfall

Permitted limit for discharge is no more than 20mg/litre above background concentration at emission point W9

The operator has specified that a measurement uncertainty factor of +/- 1.00mg/l should be applied to the reported result.

Part A operator comment: *This is a new limit and this has been discussed at length with the NRW. Awaiting confirmation once NRW develops its position on emission limits for certain water pollutants.*

NRW has not received any Schedule 5 Part B information from the operator for these exceedances. We have however discussed the introduction of this new weekly average ELV for suspended solids at W1 during other compliance interventions in 2016. NRW's findings are detailed in an email dated 15 January 2016 and in **CAR 6116**.

We have provided the following clarification in relation to the sampling requirements at W1 from 8 March 2016 onwards:

- The explanations for 'composite sample' and qualified random sample' can be found in BAT conclusion no. 15 of the Iron and Steel BATc.
- It would acceptable to use daily samples taken over a seven-day period to derive the weekly result. The minimum BAT requirement is a 24-hour composite sample or a qualified random sample (see below).
- It would not be acceptable to use a single one-off random sample for the weekly result as this would not be representative enough.
- A qualified random sample refers to a composite sample of at least five random samples taken over a maximum period of two hours at intervals of no less than two minutes, and blended.

Following discussion with the operator during March 2016, NRW agreed to accept a monthly written Schedule 5 notification from Tata in the event of continued breaches of the suspended solids weekly average ELV at W1. This is confirmed in our email to Tata dated 21 March 2016.

At a higher level NRW is considering how it applies emission limits for certain water pollutants in environmental permits and it is considering its position on Biological Oxygen Demand (BOD) and suspended solids monitoring requirements for discharges into the sea. Further information will be cascaded to Tata Steel during 2017 as NRW develops its position. In the meantime these exceedances at W1 will not be scored as non-compliant.

S5N/16/22: Schedule 5 Part A received 3 May 2016 (by email)

24 hour average for oil and grease recorded at emission point W3:

24/04/2016 – 01/05/2016: 22.70mg/l

W3: Abbey Beach Outfall

Permitted limit for discharge is no more than 20mg/litre as a daily average from beginning of discharge over a weekly monitoring frequency

The operator has specified that a measurement uncertainty factor of +/- 1.00mg/l should be applied to the reported result.

Part A operator comment: *Two days of elevated averages were experienced at the start of the discharge (24/04 and 25/04). Environment department investigated downstream activities with associated works areas and informed energy. Energy increased sampling frequency following initial elevation. It was noted that there was a significant drop by the 25/04 and that from the 27/04 the ABO flow was not significant enough to take samples. All samples are analysed chemically as opposed to the standard "visual" check within permit.*

NRW has not received any Schedule 5 Part B information from the operator for this exceedance. We have however discussed the introduction of this new 24 hour average ELV for oil and grease at W3 during other compliance interventions in 2016. NRW's findings are detailed in **NRW_CAR0031159**.

After applying the appropriate measurement uncertainty factor, this exceedance remains non-compliant with the permit limit and Condition 3.1.2. **One CCS Category 3 score** has been recorded in response to this non-compliance.

No consolidation of scores for exceedances at W3 during Quarter 2 (April – June) 2016 has been necessary.

Coke Ovens

S5N/16/23: Schedule 1 Part A received 3 May 2016 (by email)

Monthly mean (average) Door Leakage Control Factor (DLCF) and Top Leakage Control Factor (TLCF) recorded at emission point A54:

April 2016: 84.60% (Battery 1 Doors); 83.60% (Battery 2 Doors)
April 2016: 92.38% (Battery 1 Tops); 91.24% (Battery 2 Tops)

A54: Morfa Coke Oven Batteries

Permitted limit for DLCF is at least 90% of coke oven doors with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <10%)

Permitted limit for TLCF is at least 99% of coke oven tops with no leaks as a monthly mean (BAT-AEPL percentage of visible emissions is <1%)

The current DLCF and TLCF method employed by Tata and agreed with NRW is a simple binary assessment i.e. leak/no leak which does not involve grading individual emissions. The scope for error is therefore minimised and it is not necessary for the operator to specify monitoring uncertainty when reporting these parameters.

Part A operator comment: *This is a new limit and this has been discussed at length with the NRW. Significant project work has been completed and planned ahead in order to comply with this limit and a plan will be submitted to the NRW in due course.*

NRW has not received any Schedule 5 Part B information from the operator for these exceedances. We have however discussed the introduction of the new DLCF and TLCF limits at A54 during other compliance interventions in 2016. NRW's findings are detailed in **CAR 6103** and **CAR_NRW0025273**.

The exceedances for DLCF and TCLF recorded at A54 during April 2016 are non-compliant with the permit limits and Condition 3.1.2. **Two CCS Category 3 scores** have been recorded in response to this non-compliance.

We have assessed and consolidated all notified exceedances of these ELVs during Quarter 2 (April – June) 2016 under two CCS3 scores for S5N/16/23 confirmed above, in line with Annex 3 of our Compliance Classification Scheme [CCS] (version 3, 26 March 2013). The notifications for A54 which have been consolidated are listed below:

UR/16/49 received on 04/07/16

S5N/16/24: Schedule 5 Part A received 3 May 2016 (by email)

Hourly spot sample for particulates recorded at emission point A56:

12/04/2016: 20.90mg/m3
11.10 – 12.59hrs

A56: Ministerstein (3 flues)

Permitted limit is 20.00mg/m3 as a half hourly spot sample

The operator has specified that a measurement uncertainty factor of +/- 8.4% should be applied to the reported result.

Part A operator comment: *An initial investigation by the coke ovens of the system operations for the time of the emission, have shown to be working in the most efficient mode for particulate minimisation. No abnormal conditions were noted as well as no black pushes for that time of the*

day. We will further review the systems performance to understand the source/s of this breach.

After applying the appropriate measurement uncertainty factor, this marginal exceedance remains within the permitted limit of 40.00mg/m3. No non-compliance (CCS) score has been applied to this particular event.

Clarification is needed regarding the spot sampling time period for this emission point. The permit specifies a half hourly spot sample, but the operator appears to have sampled over one hour. The monitoring arrangements at A56 will be discussed further during our next compliance visit to Morfa Coke Ovens.

Blast Furnaces

S5N/16/39: Schedule 5 Part A received 25 May 2016 (by email).

Previously notified as UR/16/A4A

Release of particulates and blast furnace gas from Blast Furnace No.4 bleeder valves (emission point A4A)

Start time: 24/05/2016
End time: 25/05/2016

A4A: Blast Furnace 4 bleeders

No emission limit values (ELVs) apply to emissions/releases from A4A

Part A operator comment: *Due to instability on BF4 the technical & operational teams made significant burden changes in order to increase drive and gain burden movement. The teams have reacted swiftly to implement actions to get stability back into the furnace and operational parameters and performance continues to be actively reviewed.*

BF4 experienced a number of bleeder openings over the past 24-48hrs that are associated with a period of instability on the furnace (unsettled and experiencing drive issues). The bleeder openings are a safety feature of the furnaces and they have operated as prescribed.

NRW has not received any Schedule 5 Part B information from the operator for this notification. We have however investigated and discussed this event with Tata during a subsequent compliance intervention in 2016. NRW's findings are detailed in **CAR_NRW0025274**.

S5N/16/40: Schedule 5 Part A received 06 June 2016 (by email).

Release of particulates and blast furnace gas from Blast Furnace No.4 bleeder valves (emission point A4A)

Start time: 04/06/2016
End time: 05/06/2016

A4A: Blast Furnace 4 bleeders

No emission limit values (ELVs) apply to emissions/releases from A4A

Part A operator comment: *Due to process control difficulties BF4 has experienced a high number of bleeder openings over the past 48hrs. The teams have reacted swiftly to implement actions to get stability back into the furnace and operational parameters and performance continues to be actively reviewed.*

BF4 experienced a number of bleeder openings over the past 24-48hrs that are associated with a

period of instability on the furnace (process control difficulties). The bleeder openings are a safety feature of the furnaces and they have operated as prescribed.

NRW has not received any Schedule 5 Part B information from the operator for this notification. We have however investigated and discussed this event with Tata during a subsequent compliance intervention in 2016. NRW's findings are detailed in **CAR_NRW0025274**.

NRW ref 1603422: operator feedback received 11 August 2016 (by email).

Release of particulates and blast furnace gas from Blast Furnace No.5 bleeder valves (emission point A5A)

Start time: 21/06/2016
End time: 21/06/2016

A5A: Blast Furnace 5 bleeders

No emission limit values (ELVs) apply to emissions/releases from A5A

Operator comment: *As discussed last week, the 14 complaints received by NRW for emissions from the Blast Furnace on the 21st June will be associated with the bleeder openings that were witnessed whilst onsite. At the time, the Blast Furnace team talked through the reasoning for the events and the work ongoing to resolve the matter. We shall continue to keep you updated on Blast Furnace performance though our usual communications.*

NRW officers witnessed the activation of Blast Furnace No.5's bleeder valves on 21 June 2016 and saw the resulting emission of gas and particulates. We investigated and discussed this event with Tata during a compliance intervention which took place on the same day. NRW's findings are detailed in **CAR_NRW0025274**.

No operator notification is necessary for this event as the relevant information was supplied concurrently to NRW whilst our officers were on site.

Summary and actions required

Our assessment of notifications received during Quarter 1 2016 has concluded **ten CCS Category 3 breaches** of the operator's permit conditions have occurred in response to exceedances of permitted emission limit values (ELVs).

A **Warning** has been issued to the operator in response to the ten CCS3 breaches identified in this CAR form.

It is recognised that the impact of the EC Industrial Emissions Directive (IED) and the introduction of new BAT-AELs for Sinter plant and BOS plant point source emissions has led to increased breaches of daily mean ELVs for particulates. The IED introduces a stricter environmental compliance regime for Tata Steel's operations at Port Talbot and reflects a wider effort to improve the environmental performance of industry across Europe. NRW has a duty to enforce these new emission limits in Wales but we remain committed to working with Tata Steel to improve the environmental performance of Port Talbot steelworks.

The inspecting officer is pleased to note that Tata Steel has updated its Schedule 5 permit notification template to correctly reflect the new permit notification conditions contained in its environmental permit EPR/BL7108IM/V015.

Weekly notifications have been agreed with Tata Steel for any exceedances of the ELVs at A1, A14 and A16 (particulates daily mean). Monthly notifications have been agreed for any exceedances at W1 (suspended solids weekly average).

Clarification is needed regarding the spot sampling time period for emission point A56 (Ministerstein). The permit specifies a half hourly spot sample, but the operator appears to have sampled over 1 hour during Quarter 2 2016.

Further information will be cascaded to Tata Steel during 2017 as NRW develops its position on suspended solids discharges into the sea.

[ENDS]

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	Date	30/06/2016

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
E3	C3	Bring permitted operations back into compliance with ELV. IGNORE ACTION DUE DATE - not applicable	21/02/2017
E1	C3	Bring permitted operations back into compliance with ELV. IGNORE ACTION DUE DATE - not applicable	21/02/2017
E1	C3	Bring permitted operations back into compliance with ELV. IGNORE ACTION DUE DATE - not applicable	21/02/2017
E1	C3	Bring permitted operations back into compliance with ELV. IGNORE ACTION DUE DATE - not applicable	21/02/2017
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E1	C3	Bring permitted operations back into compliance with ELV. IGNORE ACTION DUE DATE - not applicable	21/02/2017
E1	C3	Bring permitted operations back into compliance with ELV. IGNORE ACTION DUE DATE - not applicable	21/02/2017

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.