

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

Site	Tata Steel Port Talbot steelworks	Permit Ref	BL7108IM (as amended)
Operator/ Permit holder	Tata Steel UK Ltd		
Date	29 September 2015	Time in	09.30 Out 11.30
What parts of the permit were assessed	See below		
Assessment	EPR - inspection	EPR Activity:	Installation X Waste Op Water Discharge
Recipient's name/position	Jason Heatman, Lead Environmental Engineer, Tata Steel Port Talbot		
Officers names	DMP Broom	Date issued	11/12/2015

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (*suspended scores are marked with an asterisk),
A = Assessed or assessed in part (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

Number of breaches recorded

-

Total compliance score
(see section 5 for scoring scheme)

-

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all 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. Two other companies, Cambrian Stone and Harsco, undertake separately-permitted slag handling and iron plating activities at the steelworks on Tata's behalf.

Purpose of visit/assessment: To review the investigation into a release of blast furnace gas (BFG) on furnace 5 on 24/6/2015. This report will only consider the EPR aspects and not the COMAH 2015 ones to minimise regulatory overlap or duplication.

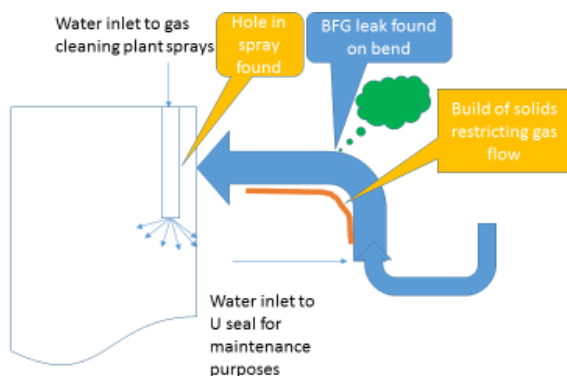
Person(s) present (Office based)

Tata Steel	Luc Bol	NRW	Mark Broom
	Isobel Vasquez	HSE	Alan Strawbridge
	Mark Wall		Andrew Hall
	Peter Diplock		Suzanne Fortingdale
	Clayton Shorthouse		
	William Lewis		
	Kevin James		
	Alan Jones		

Background

Furnace 5 was rebuilt during 2002 and restarted operations in early 2003. Before the other furnace was rebuilt some maintenance work was carried out which included replacing a U seal with a redesigned configuration to help improve operability. The release was notified to HSE under RIDDOR as a dangerous occurrence but not under the EPR permit.

On 24/6/2015 a leak of BFG was identified coming from the top of the U seal – on the bend as it goes into the gas cleaning plant. This bend was made up of a series of butt welded sections to form the bend. Closer examination of the failure showed that it was due to erosion rather than corrosion and there were restrictions found in the horizontal and vertical sections of the pipe between the gas plant and the U seal.



It looks that the build-up of solids restricted the flow of gas (and solids) so that the velocity increased and eroded the bend and caused the release. The thickness of the pipework was as designed. When the U seal was redesigned the flow rates were modelled to ensure no adverse effects. It appears that the solids in the gas phase caused a hole in the water spray that sprayed some water into the incoming gas stream which then caused over time the restriction in the pipework. There was a slight leak on the water inlet to the U seal that could have carried some war into the gas stream.

The build-up of the restriction could be seen then the thermography work was re-examined. An elongating cold section could be seen. The maintenance team were only looking for hot spots and the significance of the cold spots in this area was not identified. Previously the reverse had been found in that the maintenance teams were looking for cold spots and ignore the information on the hot spots.

In terms of EPR compliance the release could have been reported: however the use of RIDDOR reporting against EPR reporting requirements has not been raised with Tata until the issue of the recent CAR form 5937. Therefore this issue has not been scored under CCS.

Actions being taken to learn from this event –

To reduce the risk of recurrence the gas cleaning water sprays are being checked to see that the water is not spraying down into the gas flow;

The significance of cold spots has been included in the training for maintenance staff who carry out thermography in this area; Redesign of the water spray inlet to reduce the risk of erosion of the spray is to be considered along with discussing this event with the gas cleaning plant designers;

Improved isolation of the water inlet to the water U seal is being considered; and

A company-wide alert (red stripe) is being written to alert other furnaces of this potential issue.

Conclusions

There was a release of BFG on the 24/6/015 from a bend of a U seal between the gas cleaning plant and the furnace. It was caused by erosion due to a restriction caused by a solid build up in the pipework. The release was not due to the design of this seal but by the flow of water into the pipework between the furnace and the gas cleaning plant. Tata are taking short and long term actions to reduce the risk of this problem recurring. The issue of using RIDDOR reporting for EPR purposes has already been raised with Tata in the recently issued CAR form 5937.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 6037	
This form will report non-compliance with your permit as determined by an NRW officer			
Site	Tata Steel Port Talbot steelworks	Permit	BL7108IM (as amended)
Operator/ Permit	Tata Steel UK Ltd	Date	11/12/2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked
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.		
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.		n/a
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.		n/a
We will now consider what enforcement action is appropriate and notify you, referencing this form.		n/a

Section 4- Action(s)			
Where a non - compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
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 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 which 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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

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

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 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 the officer's line managers. 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) 601 0987**.