

Compliance Assessment Report

Report ID:
CAR_NRW0026798

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	13/10/2016	Time in	10:00	Out	12:30
Assessment type	Audit				
Parts of the permit assessed	1 Management; 2 Operations				
Lead officer's name	Broom, Mark				
Accompanied by	Cowie, Douglas,Baskerville, Guy,Gibson, Paul				
Recipient's name/position	Fiona Abbott/ Environment Manager	Date issued	13/01/2017		

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	
D2 - Incident Management - accidents, emergency and incident planning	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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 sinter plant and the improvements made by Tata to its emissions abatement systems. We also held a short discussion with Tata regarding the company's management plan which has been produced in response to a recent oil spill at Phoenix Wharf tank farm.

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

Person(s) present

Tata Steel

Fiona Abbott
Claire Grainger
Andrew Townsend

NRW

Paul Gibson
Mark Broom
Doug Cowie
Guy Baskerville

Phoenix Wharf tank farm

Tata's draft Phoenix Oil Farm – Heavy Fuel Oil Leak Management Plan was discussed. There is now access to the full length of the oil transfer pipework between Phoenix Wharf and the Power Plant. Due to the reduced flow and therefore slower collection of heavy fuel oil (HFO), Veolia's operation will be stood down and Tata will use the 'Million Gallon Tank' system for recovering and separating the collected oil and water from the spill area. Approximately 50t of HFO has now been recovered.

NRW has commenced an investigation into this oil spill. A compliance report specifically addressing this will be issued in due course.

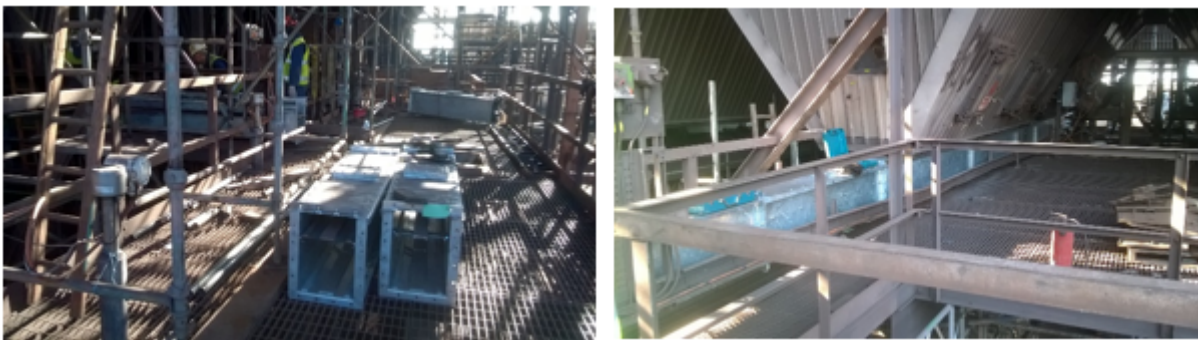
Sinter Plant

A number of improvements have been made to emissions abatement at the sinter plant. The project area is subject to the Construction (Design and Management) [CDM] Regulations 2015 and therefore a site induction was provided by Tata before our inspection. We specifically looked at the north electrostatic precipitator (ESP) for the sinter plant main stack waste gas stream. A recent plant maintenance stop had been carried out which has allowed Tata to:

- Install new chain conveyors beneath the north ESP;
- Replace field 6 of the north ESP; and
- Improve the sealing and integrity of the ESP and wind main system.

This package of work will enable the lignite-lime injection system to be operated safely, reduce releases and consistently achieve the BAT-AELs for the sinter plant.

The new dust collection chain conveyors beneath the ESP were being installed (left-hand photo below) at the time of our inspection. The right-hand photo shows a section of installed conveyors. This conveyor replacement work was not within the original project scope.



The old plates (below left photo) for field 6 on the north ESP were being removed and new plates (below right photo) were being prepared for installation.



The left-hand photo below shows damage on the old ESP plates and the right-hand photo below shows the plates hanging inside the ESP ready for removal. The open space at the left centre shows where the plates have already been removed.



The new bellows and some other areas have been over plated to seal the wind main connections into and out of the ESPs across the sinter plant ducting. The right-hand photo below shows the condition of the north ESP wind main connection in April 2016. Damage to the metal cladding can be seen circled in red. A new plate has also been placed over a section of cladding towards the left of the photo.

The right-hand photo below shows the same wind main connection in October 2016. The damaged areas have been repaired and overplated.



Further significant work is planned for March 2017 when the next major sinter plant maintenance stop will take place. In the meantime, some work can also be carried out during the shorter 1-day sinter plant stops which normally take place on a weekly basis.

Conclusions

NRW has commenced an investigation into the HFO spill at Phoenix Wharf tank farm. Tata's clean-up operation is ongoing. The rate of oil recovery has slowed as more oil is captured and the flow within the spill area reduces.

It was good to see how the sinter plant improvements have progressed. The wind mains, conveyors and ESPs have required extensive refurbishment work, but the project has brought Tata closer to the point where lignite-lime injection can commence which will in turn have a positive impact on main stack emissions.

[ENDS]

EPR Compliance Assessment Report

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Operator/Permit holder	Tata Steel UK Limited	Date	13/10/2016

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 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.