

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	24/11/2015	Time in	13:00 Out 15:00
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, G Baskerville & DE Cowie	Date issued	11/3/16

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	N	
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	N	
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	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	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	N	
	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 discuss Tata Steel's complaint handling procedures and NRW's future approach to steelworks complaints received via its Pollution Incident Hotline.

Person(s) present (Office based)

Tata Steel	Scott McKinnon Fiona Abbott Jason Heatman	NRW	Mark Broom Doug Cowie Guy Baskerville
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Tata Steel Port Talbot is reviewing how it handles and manages complaints about the steelworks. The parent Tata Group is also starting to review how it handles and manages complaints. This wider review is at an early stage and is looking to benchmark Tata's work and compare it with other sites and companies. NRW would like to be kept informed of progress with this review.

Tata Steel Port Talbot is, in part, responding to concerns raised by local councillors regarding the lack of timely feedback to complainants who report releases from the installation. Tata endeavour to contact complainants by phone 3 times and only if there is no response will they send out an acknowledgment letter. All complaints are now reviewed weekly and Tata's initial aim is to get back to every complainant promptly to make contact and acknowledge the complaint. Tata then aim to close out all complaints notified directly to the steelworks within 1 month of the initial contact.

Tata is also now emailing a weekly update to the local councillors on complaint related issues. NRW requests to be kept informed of what feedback is being provided.

NRW has been examining how it deals with steelworks complaints received via its Pollution Incident Hotline. We intend to conduct a regular review of these complaints on a quarterly basis. As part of this review, NRW would require a progress update from Tata Steel on topics or issues that are known to generate complaints. It would be helpful for Tata to provide some context around certain issues such as the percentage of blows on the BOS plant that have a 'recorded stop'. NRW's aim is to provide regular, informed feedback to complainants at the end of each quarter. Quarterly updates could also be provided to local stakeholders e.g. councillors in a similar, structured manner.

It was recognised by both organisations that certain acute or serious steelworks pollution events may require a swifter response in terms of public engagement and feedback. Both NRW and Tata Steel's resources, management systems and procedures have enough flexibility to address this type of event.

In 2016 NRW will be switching to a new system for recording environmental incidents which will be known as the Wales Incident Recording System (WIRS). We will keep Tata Steel informed of when this is likely to happen and of any changes this may mean for current steelworks complaint handling arrangements.

End of life conveyor belts

This matter has previously been discussed in CAR 5919. An update on progress was provided although NRW's formal request for a plan is still outstanding.

NRW has provided advice regarding the waste (EWC) codes that could potentially be applied to this type of waste.

Tata's regeneration team have been looking at a plan for this issue. They now know how many conveyors they are potentially dealing with at Port Talbot steelworks and they are currently considering a third party reuse option as well as exploring other reuse and / or recycling routes. Tata agreed to provide the inspecting officers with a further update in early 2016.

Conclusions and further actions required

1. NRW requests to be kept informed of what complaint feedback is being provided by Tata Steel to local councillors.
2. NRW requires a quarterly progress update from Tata Steel on topics or issues that are known to generate complaints. It would be helpful for Tata to provide some context around certain issues such as the percentage of blows on the BOS plant that have a 'recorded stop'.
3. NRW to keep Tata Steel informed of developments regarding its new WIRS system for recording incidents.
4. Tata Steel to provide NRW with a further update regarding end of life conveyor belts in early 2016.

[END OF SECTION 2]

	EPR Compliance Assessment Report	Report ID: 6052	
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	11/3/16

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			
C2	N/A	NRW requests to be kept informed of what complaint feedback is being provided by Tata Steel to local councillors.	As and when feedback is provided
G2	N/A	NRW requires a quarterly progress update from Tata Steel on topics or issues that are known to generate complaints. It would be helpful for Tata to provide some context around certain issues such as the percentage of blows on the BOS plant that have a 'recorded stop'.	Before the end of Q1 2016 and every quarter thereafter
D2	N/A	NRW to keep Tata Steel informed of developments regarding its new WIRS system for recording incidents.	As information becomes available
E5	N/A	Tata Steel to provide NRW with a further update regarding end of life conveyor belts in early 2016.	31 March 2016

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**.