

Compliance Assessment Report

Report ID:
CAR_NRW0026746

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	28/09/2016	Time in	09:30	Out	16:30
Assessment type	Audit				
Parts of the permit assessed	1 Management; 2 Operations; 3 Emissions and Monitoring; 4 Information				
Lead officer's name	Cowie, Douglas				
Accompanied by	Broom, Mark,Baskerville, Guy				
Recipient's name/position	Fiona Abbott/ Environment Manager	Date issued	20/01/2017		

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	
B5 - Infrastructure - Plant and equipment	A	
C2 - Infrastructure - Management system and operating procedures	A	
D2 - Infrastructure - accidents, emergency and incident planning	A	
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	A	
F3 - Infrastructure - Dust/fibres/particulates and litter	A	
G1 - Infrastructure - Monitoring of emissions and environment	A	
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	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

To review the complaint issues reported to Tata over the previous quarter of operation (Jul 16 – Sep 16 inclusive). An inspection of Phoenix Wharf oil tank farm was also undertaken following Tata's notification of a heavy fuel oil spill. Finally we inspected the stockyards, sinter plant conveyors and the Blast Furnace No.5 stockhouse.

Person(s) present

Tata Steel

Fiona Abbott
Jason Heatman
Claire Grainger
Andrew Townsend
Scott McKinnon (Complaints)
Jamie-Ross Landeg (Complaints)
Jason Massey (Complaints)
Chris Roberts (Phoenix Wharf)
Giles Payne (Phoenix Wharf)
Tony Cerasoulo (Stockyards)
Darren Isaac (Sinter Plant)
Tom Watson (Sinter Plant)
Mark Davies (BF5 Stockhouse)

ESL

Paul Edwards
Joanna Edwards

Future Industries

Gareth Williams

Veolia

Cameron Doster

NRW

Guy Baskerville
Doug Cowie

Complaints

Tata collate their complaints in a spreadsheet and they use this document to track their contact and close out with each report. Complaints received during the second financial quarter (Jul – Sep) of 2016/17 have included dust fallout, BOS plant fumes, coke ovens odour and noise. The number of complaints received has dropped significantly compared to the previous quarter.

The previous quarter and the year as a whole is dominated by complaints about bleeder valve openings at No.4 and No.5 Blast Furnaces. 51% of the total number of complaints received by Tata in 2016 have been in relation to these furnace issues during May and June. Furnace stability has improved between Jul – Sep 2016.

Blast furnace outages appear to have affected operations at the BOS plant during Q3. Each furnace has had one stop. Silicon in iron levels tend to rise when bringing the furnace back online following a stop. Increased levels of silicon in iron increases the risk of a stop occurring at the BOS plant. Ironmaking has agreed tighter levels of silicon in the molten iron they supply to the BOS plant, which should help reduce the number of stops.

NRW undertook some sound monitoring in June 2016 and we are still analysing the results. Feedback will be provided when this analysis is complete.

Details of the monthly dust/fallout results from the deposition monitoring carried out by Neath Port Talbot County Borough Council (NPTCBC) have not been received for the most recent months. This data will be reviewed when it becomes available.

Phoenix Wharf tank farm

During August 2016 Tata notified NRW about a spill of up to 50 tonnes of Heavy Fuel Oil (HFO) within an unoccupied area of land near the Phoenix Wharf tank farm serving the steelworks. Tata noted that the level of HFO stored at the tank farm had dropped more than expected and a potential leak was suspected.

An internal investigation by Tata found no leaks at the tank farm itself. The fuel pipeline between the tank farm and the power plant was then checked and a leak was discovered in an overgrown, unoccupied area of land with difficult access located south-east of the tank farm. The leak has now been isolated and stopped.

The pipeline transects an area of thick reed bed with standing water approximately 6 feet deep in places. The leak was located near a supporting stanchion where the pipeline makes four 90-degree turns. The area appears landlocked with no watercourses or drains running away from it, resulting in the spill being 'naturally contained'. No oil has been found in Port Talbot Docks or in any nearby storm water systems. The Docks area is being checked regularly for any surface oil.



During the week commencing 19 September 2016 we were notified by Tata that access to the spill area had been secured and a temporary boardwalk had been created through a cleared area

of reed bed. From one of the boardwalk platforms we were able to see the location of the leak and the scale of the impact on the surrounding water and land. The oil pollution is extensive but there is no public access to the spill area and the contamination appears to be localised to the steelworks. The photos below show the pipework route, access to the pipework, oil being skimmed and the reed clearance work. Future Industries and EDS have been contracted by Tata to undertake the clean-up work.



The next set of photos below show the oil recovery system operated by Veolia UK. Skimmed oil and water is directed to a holding tank, heated and separated before being directed to a polishing unit. Separated oil is being returned to a previously unused tank within the Phoenix Wharf oil tank farm for recovery.



NRW will now conduct further investigations into this oil spill. We will write to the operator and issue a separate CAR form addressing this matter in due course.

Stockyards

Following on from CAR_NRW0026744 we conducted inspections of the stockyards, sinter plant and blast furnace stockhouse works areas. The photos below show the stockyard areas looking west from the control tower on this damp and overcast day.



The below photos show the sinter feed preparation (lay-down) areas.



Sinter Plant

Below are photos of the waste gas main Electrostatic Precipitators (ESPs) at the sinter plant. The refurbished incoming waste gas duct is shown (left photo) with three new dust collectors and scaffolding around the exit of the south ESP going into the main stack (right photo). A major maintenance stop has been taken to deal with air (oxygen) ingress and improving the performance of the sinter plant ESPs.



Tata use a foam suppression system that coats the finished sinter product as it leaves the sinter plant (below left photo) by conveyor and travels towards the stockhouses serving the blast furnaces. Tata and its foam contractor Nalco are replacing metal pipework with alkathene to reduce the occurrence of fouling and blockages due to biofilm build-up within the pipes. A biocide treatment system is also being installed to also help reduce this problem.



At the time of inspection the foam suppression systems at the sinter plant were operating normally, although ambient air temperatures were seasonally low and the weather was damp and overcast. The systems are tested to their fullest when conditions are hot and dry e.g. summer months.

Stockhouses

Once the sinter passes through the stockhouse area, there are a series of mechanical screens that have foam suppression sprays fitted to minimise fugitive dust from the movement of raw materials up to the blast furnaces. This is an area NRW has previously scrutinised and was believed to be partially responsible for some of the nuisance dust (fallout) problems encountered in 2013 and 2014. Several interventions have been made by Tata since then including the optimisation of foam suppression systems but also changes to stockhouse loading techniques and cleaning methods.

The next two photos show screens we inspected at the stockhouse serving Blast Furnace No.5, with sinter being carried away from a screen in the right hand photo. We witnessed foam being applied to the moving sinter shortly after each screen started up.



In NRW's view the stockhouse screens are one of the critical areas for fugitive dust suppression in this part of the steelworks and they should be regularly checked and maintained to ensure all foam suppression systems are working correctly. NRW will periodically inspect and check for emissions from these areas.

After leaving the screens, the sinter and other raw materials pass along more conveyors and then up a bucket/skip elevator into the blast furnace.



Conclusions

The number of steelworks complaints received by NRW has dropped compared to the previous quarter which was dominated by blast furnace bleeder openings.

The HFO spill near the Phoenix Wharf tank farm is significant and will require further follow-up investigation by NRW.

Although we inspected on a wet and gloomy day, fugitive dust control and suppression measures were in use. NRW will periodically inspect the sinter plant and stockhouses to ensure Tata's foam suppression systems are operating correctly.

[ENDS]

EPR Compliance Assessment Report

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Operator/Permit holder	Tata Steel UK Limited	Date	28/09/2016

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.