

## Compliance Assessment Report

**Report ID:**  
**CAR\_NRW0031391**

**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           | 17/10/2016                                                            | Time in     | 10:30      | Out | 13:00 |
| 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    | Jason Heatman/ Senior Environmental Engineer                          | Date issued | 11/04/2017 |     |       |

### 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 - Specified by permit                                                                                       | A            |                       |
| C2 - General Management - Management system and operating procedures                                           | A            |                       |
| E1 - Emissions - Air                                                                                           | A            |                       |
| E3 - Emissions - Surface water                                                                                 | A            |                       |
| G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment               | A            |                       |
| G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events        | A            |                       |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | A            |                       |
| H1 - Resource Efficiency - Efficient use of raw materials                                                      | 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.

|                                    |          |                                                                     |          |
|------------------------------------|----------|---------------------------------------------------------------------|----------|
| <b>Number of breaches recorded</b> | <b>0</b> | <b>Total compliance score</b><br>(see section 5 for scoring scheme) | <b>0</b> |
|------------------------------------|----------|---------------------------------------------------------------------|----------|

**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

Tata Steel has reviewed the monitoring and reporting requirements for its permitted EPR operations at Port Talbot and the Large Combustion Plant (LCP) at the steelworks which are included in the UK Transitional National Plan (TNP). This inspection examined the outcomes from Tata's review and agreed future monitoring and reporting approaches for both the EPR and TNP regimes. The outcomes from this inspection will inform NRW's assessment of Tata's 2016 annual returns.

We also reviewed the trial use of recovered fuel oil from Tata Steel's Llanwern steelworks at Morfa Coke Ovens.

An update on the Ferrous Metal Processing (FMP) BAT-Reference (BREF) review was provided by NRW.

The relevant permit conditions are listed under Sections 1.1, 1.3, 2.1, 2.3, 3.1, 3.5, 3.6, 4.1, 4.2 and 4.3 of Tata's permit.

### Person(s) present

#### Tata Steel

Jason Heatman  
Jamie-Ross Landeg  
Jason Massey

#### NRW

Mark Broom  
Doug Cowie  
Guy Baskerville

### UK TNP monitoring and reporting

The TNP aims to enable operators of qualifying LCP to improve their emissions performance from December 2015 levels in order to achieve the Emission Limit Values (ELVs) set out in Chapter III

of the Industrial Emissions Directive (IED) by 1 July 2020. The TNP has been developed by the United Kingdom and ratified for use by the European Union (EU). Increasingly tight annual limits are allocated each year for Sulphur Dioxide (SO<sub>2</sub>), oxides of Nitrogen (NO<sub>x</sub>) and Particulates and apply to each LCP that has been entered into the TNP.

The following table summarises the different forms used to capture LCP data required under the UK TNP:

| Form                         | Title                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                  |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <b>IED HR1</b>               | <b>ANNUAL OPERATING HOURS RETURN</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                  |
|                              | Annual operating hours return.<br>For each LCP: Annual operating hours. For each LCP with a Limited Lifetime Derogation or a 10,000h monitoring derogation: cumulative operating hours from 1 Jan 2016. For each LCP or Unit with a 1,500h derogation: annual derogated operating hours (from entry date in first year) and 5 year running average from entry date. For a combined cycle gas turbine that operates with a bypass stack in normal operation, the bypass hours during normal operation are included in the plant hours but are also reported separately. | Required new form                                                                |
| <b>IED RTA1</b>              | <b>QUARTERLY RETURN OF MONTHLY SO<sub>2</sub>, NO<sub>x</sub> AND DUST MASS RELEASE DATA</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                  |
|                              | Quarterly mass emissions return for plant in the TNP or with a Site Specific NO <sub>x</sub> limit.<br>TNP and IED inventory (for every LCP): Mass emissions <u>excluding</u> start-up and shut-down.<br>Site Specific NO <sub>x</sub> limits (additional report if applicable): Mass emissions <u>including</u> start-up and shut-down.                                                                                                                                                                                                                               | Required and routinely submitted                                                 |
| <b>IED AR1</b>               | <b>ANNUAL RETURN OF ENERGY INPUT AND TOTAL EMISSIONS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                  |
|                              | IED Inventory annual energy and annual mass emissions return.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Currently reported using a different form                                        |
| <b>IED CON 1 / IED CON 2</b> | <b>QUARTERLY RETURN OF MONTHLY MEAN, MONTHLY MAXIMUM DAILY MEAN AND ANNUAL RETURN OF HOURLY CONCENTRATION PERCENTILES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                  |
|                              | Quarterly return for each LCP (and each Unit with a 1,500h derogation regarded as a separate LCP).<br>Validated concentration data: Monthly mean; Maximum daily mean within month (applied as 95th percentile in the interim BAT period for some plant); Annual 95th percentile of hourly averages. Co not needed as only needed for gas turbines                                                                                                                                                                                                                      | Some data reported using existing forms but not in this format                   |
| <b>IED PM1</b>               | <b>SIX-MONTHLY RETURN OF DISCONTINUOUS MONITORING RESULTS (AS REQUIRED)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                  |
|                              | Periodic monitoring return (e.g., annual mercury test) or Alternative monitoring return (as required by the Competent Authority).                                                                                                                                                                                                                                                                                                                                                                                                                                      | Currently reported but using a different form                                    |
| <b>IED BD1</b>               | <b>QUARTERLY RETURN OF CUMULATIVE ANNUAL ROLLING MALFUNCTION AND BREAKDOWN HOURS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                  |
|                              | For each LCP fitted with abatement, return the cumulative Malfunction and Breakdown hours as a rolling average (12 monthly period) that is updated on a monthly basis<br><br><a href="https://www.energy-uk.org.uk/publication.html?task=file.download&amp;id=5650">https://www.energy-uk.org.uk/publication.html?task=file.download&amp;id=5650</a><br><br>See page 18 of the ESI compliance protocol for abated and unabated breakdowns and malfunctions – the immediate paragraphs above section 3.6.2                                                              | Not applicable at present – may be once coke oven gas desulphurisation is in use |
| <b>IED MF1</b>               | <b>RETURN OF MALFUNCTION AND BREAKDOWN DATA (AS REQUIRED)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                  |
|                              | Validated concentration data for each day affected by Malfunction or Breakdown. – Only required when there has been data excluded and invalidated                                                                                                                                                                                                                                                                                                                                                                                                                      | To be used when data is excluded for Malfunction and breakdown purposes          |
| <b>IED CEM 1</b>             | <b>CONTINUOUS MEASUREMENT SYSTEMS INVALIDATION LOG</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                  |
|                              | Quarterly CEMs Invalidation Log for each LCP as required by the IED Chapter III Monitoring Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                | CEMS invalidation log in use and routinely reported                              |

| REM-1 | RESOURCE EFFICIENCY METRICS (NOT APPLICABLE IN WALES)                                                                            |                                                                                                              |
|-------|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
|       | Annual Installation Resource Efficiency Metrics for Electricity Supply Industry Sub-Sector                                       | Advice needed on the boundaries of the combustion plant and its relationship to the information requirements |
|       | <b>TNP Verification report NOx etc</b>                                                                                           |                                                                                                              |
|       | This is an annual report that summarises the NOx, SO2, Particulates and CO measurement systems when ASTs or QALs are carried out | New Annual report                                                                                            |
|       | <b>TNP Verification report Os H2O</b>                                                                                            |                                                                                                              |
|       | This is an annual report that summarises the Oxygen and water measurement systems when ASTs or QALs are carried out              | New Annual report                                                                                            |
|       | <b>TNP Verification report Flow</b>                                                                                              |                                                                                                              |
|       | This is an annual report that summarises the flow measurement when ASTs or QALs are carried out                                  | New Annual report                                                                                            |

NRW has further clarified the TNP reporting requirements in CAR\_NRW0026924 and CAR\_NRW0031297. The general concept is that environmental data should only be reported once to the regulator and then used many times. So if Tata's LCP data is already reported under the TNP, the same data should not be reported again to meet the permit requirements. To reflect this approach and minimise unnecessary reporting, the monitoring elements of Tata's permit will be reviewed when the next permit variation is assessed.

Boiler 3 is not in the UK TNP and Tata therefore does not need to report **quarterly** emissions data (form RTA1) for Boiler 3 to the TNP Registry. We suggest that a 'surrogate' RTA1 form could be completed for Boiler 3 to capture its quarterly mass emissions. This would standardise the monitoring Tata need to capture and allow a clear comparison with quarterly mass emissions from its other LCPs. **The surrogate RTA1 form for Boiler 3 should only be submitted to NRW's inspecting officer(s) and does not need to be sent to the UK TNP Registry every quarter.**

Annual data is required for **all** Tata's LCPs and this should be reported using the AR1 and HR1 forms. This information is used to populate the UK LCP Inventory.

A query was raised regarding the meaning of 'breakdown' vs 'malfunction' in the context of LCP monitoring and reporting (form BD1). NRW's view is that 'breakdown' means unabated operation – all emissions abatement has failed or broken down, while 'Malfunction' means a partially abated operation i.e. some units are operating unabated in a multi-unit LCP or abatement system which is not performing properly. Further guidance on this topic is outlined in the Joint Environmental Protocol (JEP) – ESI IED Compliance, with definitions on page 18.

<https://www.energy-uk.org.uk/publication/272-governmentdocuments.html>

Carbon Monoxide (CO) reporting on forms BD1 and MF1 is applicable to gas turbines only.

On form PM1, periodic testing for mercury (Hg) is not required for Port Talbot steelworks as no LCPs use coal or lignite as a fuel source. See JEP guidance section 3.4 referring to IED Annex V Part 3(4):

4. For combustion plants firing coal or lignite, the emissions of total mercury shall be measured at least once per year.

## EPR/BL7108IM: monitoring and reporting

Tata currently use four distinct sets of reporting forms for monitoring required under the EPR permit for the steelworks. Tata's review has identified some ambiguities and queries for the data reported using these forms. Since April 2015 Tata has needed to report quarterly (waste returns,

energy generation returns), six-monthly (water emissions returns) and annually (air emissions returns) to NRW.

## Effluent returns

Effluent returns are divided into outfalls and sumps:

### **Outfalls**

- W1 (Long Sea Outfall) reporting now consolidated into revised *Form I&S W1 Monthly* to reflect agreed weekly monitoring approach.
- Existing *Form I&S W3* and *Form I&S W5* are retained but modified to reflect current permit requirements.
- Existing *Form I&S W4* needs to be retained but can be modified to reflect monitoring approach agreed in CAR 6103:

#### W4 – iron ore stockyard into Afan estuary

Tata's current permit does not specify any emission limit values (ELVs) or sampling frequencies for W4. The original 2004 PPC permit for the steelworks did include an Improvement Condition (IC) which asked Corus UK to submit a monitoring proposal for W4. Corus' response was received in September 2004 and proposed limited sampling for pH, suspended solids, total iron, soluble iron and oil. The detail does not appear to have been agreed following Corus' submission, but a reporting form (I&S W4)

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has previously been used to capture monitoring data for this emission point.

The stockyards discharge at W4 is intermittent and rainfall-dependent. Tata has identified access problems at the discharge point which may prevent safe sampling; however there is a sump located closer to the stockyards which may provide a safer sampling option. Tata agreed to investigate this further and confirm if the sump is a suitable (and safe) sampling location.

The Iron and Steel BAT conclusions do not set any limits or BAT-AELs for this type of release. NRW therefore proposes that Tata conducts a monthly check at the agreed W4 sampling point. If a flow is detected, then the discharge should be sampled and analysed for the following parameters previously identified in Corus UK's IC response:

- pH
- Suspended Solids (mg/l)
- Total Iron (mg/l)
- Soluble/Dissolved Iron (mg/l)
- Oil and grease (visible check)

The results should be reported to NRW every 6 months in accordance with the new reporting frequencies outlined in Schedule 4 Table S4.1. *Form I&S W4* can still be used for reporting purposes. If any changes to I&S W4 are needed, an editable electronic copy should be submitted to NRW's inspecting officers so this can be modified and re-issued.

It would be helpful to clarify the situation with the stockyards sump so sampling and monitoring arrangements for W4 can be agreed for 2017/18.

- Some data reported using *Form I&S Annual W1* is already submitted annually for the UK Pollutant Release and Transfer Register (PRTR). However not all pollutants listed in the permit are required under the PRTR, therefore annual reporting needs to be retained in some form for EPR. We suggest that *Form I&S Annual W1* is modified to reflect the parameters listed in Table S3.9A and Table S4.3 pertaining to annual effluent and water releases.

### **Sumps**

- *Form Effluent 3* is no longer required as the permit does not require effluent monitoring for the Hot Mill, Cold Mill and CAPL.
- *Form Effluent 1* and *Form Effluent 2* should be retained to capture effluent monitoring at the Coke Ovens, BOS Plant and Blast Furnaces. There is ambiguity about the reporting requirements for emission point W6 (Coke Ovens). Tata has already proposed a monitoring and reporting strategy for emission points W6, W7 and W8 in its submission for

Improvement Condition (IC) 7. NRW needs to review this submission and agree the monitoring and any applicable reporting requirements with Tata. The effluent forms can then be modified if required.

### Iron & Steel returns

Monthly, quarterly, six-monthly and annual returns are currently used for iron and steelmaking activities.

*Form KPI* is a legacy Environment Agency requirement and can be removed.

For continuous monitoring (CEMS), these forms could be rationalised where appropriate to capture the monitoring results required to demonstrate compliance with the permitted hourly and daily means. A common template could be developed for CEMS data similar to the example suggested below:

| A1 Sinter Plant Main Stack (DM) |               |                       |                        | Particulates |                          |            | ELV: 40.00mg/m3 as a Daily Mean |              |                                        |                             |
|---------------------------------|---------------|-----------------------|------------------------|--------------|--------------------------|------------|---------------------------------|--------------|----------------------------------------|-----------------------------|
| Month                           | Days in month | No. of operating days | No. of valid data days | Daily max.   | Date & time of max value | Daily min. | No. of days >DM value           | Monthly mean | Monitoring or sampling uncertainty (%) | Monthly throughput (tonnes) |
| Jan                             | 31            | 30                    | 29                     | 74           | 19/01/17 23:59           | 24         | 6                               | 37           | +/- 30%                                | 320,000                     |

An annual review and commentary on the monitoring data could include charts/graphs discussing annual performance against permitted ELVs, data trend analysis, explanation of ELV breaches and interpretation of the results. NRW and Tata have discussed a concept whereby annual EPR returns are submitted at the end of January, annual PRTR and TNP returns submitted in February and finally a data commentary/review submitted in March each year. Tata's permit will need to be modified to reflect this concept if both parties are in agreement.

For discontinuous (spot sample) monitoring, many of the existing 'DCM' reporting forms will need to be retained, but for non-LCP emissions these results only need to be reported to NRW on an annual basis. This includes the six-monthly dioxins and furans monitoring for the sinter plant i.e. sample six-monthly, report annually.

Energy generation (LCP) activities already need to report quarterly and annually under the UK TNP (see above). The TNP reporting forms – including the surrogate RTA1 form for Boiler 3 – could be used to meet the EPR requirements provided that compliance with the permitted ELVs can also be demonstrated. The common template suggested above for CEMS data could be used to capture any missing parameters not required by the TNP but required under EPR.

### Iron & Steel returns (annual)

Twelve reports are currently submitted annually to NRW for iron & steelmaking activities. The number of reports can be reduced but must include:

- *Form LCPD Annual 2*
- *I&S DCM Part 1 (modified to reflect CEMS changes)*
- *I&S DCM Part 2 (modified to reflect CEMS changes)*
- *Site Operational + 'ferrous cargo delivery' & 'carbon cargo delivery' (tonnes)*
- *Schedule 9 RSR*
- *Form Energy 1*

Sulphur in coal should continue to be recorded using *Form Coke Operational 1*, but does not need to be reported to NRW. Similarly *Form LCPD Annual 2* does not need to be reported to us but the captured data aids with verification of TNP returns.

We have agreed that the requirement to monitor for Vanadium (relevant to LCP) is no longer necessary. This requirement has not carried forward from the Large Combustion Plant Directive (LCPD) into the Industrial Emissions Directive (IED). Tata do not undertake any waste incineration or co-incineration activities which would necessitate vanadium monitoring.

#### Morfa returns

Monthly, quarterly, six-monthly and annual returns are currently used for coke making activities at Morfa Coke Ovens.

The requirement to monitor the opacity of visible smoke at A55 (Morfa Main Stack) appears to have been omitted by mistake from Schedule 3(c) and Schedule 3(d) of the permit. Tata is requested to continue monitoring opacity using the Ringelmann 1 method and report breaches of the 30 minutes in any day limit to NRW. The omission will be corrected as part of permit variation V016. A new annual reporting form could be necessary for this monitoring parameter; otherwise 12 x *Form Coke CEMS Smoke* will need to be submitted by 31 January each year.

Modification of other forms may be needed to reflect the new annual reporting requirements. The data included in the following reports is still required by NRW:

- *Form Coke DCM CF*
- *Form Coke DCM Parts*
- *Form DCM SO<sub>2</sub> & NO<sub>x</sub>*
- *Form Coke Minister Stein*
- *Form Coke DCM Misc*

Annual limits for SO<sub>2</sub> and NO<sub>x</sub> at A55 remain in Table S3.9A of the permit, therefore *Form Coke Monthly SO<sub>2</sub> and NO<sub>x</sub>* must also be retained. The key result is the annual tonnage figure at A55 for both SO<sub>2</sub> and NO<sub>x</sub>.

The Secondary Coal Crusher (A58) is no longer operational and therefore Tata may request this emission point is removed from the permit at the next opportunity.

Reporting of fugitive coke ovens emissions (DLCF, TLCF, MEF, PEF) requires further discussion to harmonise the current agreed monitoring methods (based on compliance against a monthly mean) with the reporting forms. This will be discussed at a future compliance inspection in 2017.

#### **Llanwern oil trial**

Tata Steel continues to investigate the effectiveness of different recovered fuel oils (RFO) as a coking coal density enhancer at Morfa Coke Ovens, Port Talbot. NRW has agreed to a limited trial at Port Talbot using RFO won from Tata's activities at Llanwern. If successful the Llanwern RFO may provide a back-up source of density enhancer in addition to the RFO sourced from within Port Talbot steelworks and RFO from Trostre works.

Tata conducted a 1-month trial using Llanwern RFO in August 2016. The results from this trial were presented and discussed. The trial was undertaken using the same parameters as previous trials involving RFO from Port Talbot steelworks and Trostre works. The performance of the Llanwern RFO has proved adequate and has not resulted in any adverse impacts on the environment or the coke-making process, but it does not appear to be as effective as a density enhancer compared to the Port Talbot or Trostre oils.

Based on the trial results it is envisaged that the Llanwern RFO could provide a back-up supply of RFO. However there were limitations to the trial that Tata would like to address and better

understand its performance. A different coal charging machine was used for operational reasons outside the control of the co-ordinating engineers. Tata would like to see how the Llanwern oil performs using the regular coal charging machine and may request an extended trial using approximately 3.0 litres of Llanwern RFO per tonne of coal. NRW awaits further information from Tata.

### **Ferrous Metal Processing BREF update**

The FMP BREF and Best Available Techniques (BAT) Conclusions review is due to start with the Kick-off Meeting scheduled for 15 – 18 November 2016 in Seville. The UK's approach is to split the FMP BREF into two main parts:

1. Galvanising; and
2. Hot Rolling and other related processes.

The UK hot rolling/cold rolling industry sector is due to hold a meeting at Stocksbridge, South Yorkshire on 25 October 2016 to inform the UK position at the Kick-off Meeting. The equivalent meeting of the Galvanising industry sector is scheduled for 2 November 2016 in Sutton Coldfield, West Midlands.

### **Conclusions**

This inspection examined the outcomes from Tata's review and discussed future monitoring and reporting approaches for both the EPR and TNP regimes. The outcomes from this inspection will inform NRW's assessment of Tata's 2016 annual returns.

A summary of the different forms used to capture LCP data required under the UK TNP has been provided. Data reported under the TNP should not be reported again for EPR (permit) purposes.

A number of EPR permit reporting forms need to be modified and/or harmonised with the current permit monitoring requirements. A reporting template for non-LCP CEMS data has been suggested by NRW. The monitoring elements of Tata's permit will be reviewed when the next permit variation is assessed.

The Llanwern RFO trial has been completed but Tata would like to conduct an extended trial because of operational reasons outside the control of the co-ordinating engineers. NRW awaits further information from Tata.

An update on the Ferrous Metal Processing BREF was provided with details of some upcoming meetings.

[ENDS]

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0031391**

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

|                        |                                         |            |            |
|------------------------|-----------------------------------------|------------|------------|
| Site                   | Port Talbot Steel Works<br>EPR/BL7108IM | Permit Ref | BL7108IM   |
| Operator/Permit holder | Tata Steel UK Limited                   | Date       | 17/10/2016 |

### 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 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](mailto: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.