

Compliance Assessment Report

Report ID:
CAR_NRW0032902

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	30/01/2018	Time in	10:00	Out	12:30
Assessment type	Report/Data Review				
Parts of the permit assessed	See below				
Lead officer's name	Broom, Mark				
Accompanied by	Cowie, Douglas				
Recipient's name/position	Fiona Abbott/ Environment Manager	Date issued	26/02/2018		

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	

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 Steel) 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). Tata Steel has several defined industrial 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 steel). The permit also covers coke making and the reception, stockpiling and blending of raw iron making materials. Four other companies – Cambrian Stone, Harsco Metals, Runtech and ICL – are contracted to undertake their own permitted activities at the steelworks on Tata Steel's behalf.

Purpose of visit/assessment

To review Tata Steel's submission to the UK (government) representatives who are collating industry's response to the Ferrous Metal Processing (FMP) BREF note, which is undergoing review by the European IPCC Bureau (EIPPCB).

The relevant permit conditions are listed under Sections 1.1, 2.1 and 2.3 of Tata's permit.

Person(s) present

Tata Steel

Mike Launder
Jason Massey
Bob Lewis
Neil Haines
Anthony Lee

NRW

Mark Broom
Doug Cowie

Ferrous Metal Processing BREF

The Ferrous Metal Processing BAT-Reference (BREF) note review has commenced. The outcome of this review by the EIPPCB will be a new set of Best Available Techniques (BAT) Conclusions for this industry sector.

Part of the FMP BREF review involves data gathering. The EIPPCB uses a spreadsheet-derived questionnaire to gather information on selected industrial sites. Port Talbot steelworks has been chosen as a hot mill site example, but not for its cold mill or continuous annealing and processing line (CAPL) facilities.

During this intervention, we reviewed Tata Steel's draft answers to assist with the questionnaire submission process. Tata Steel needs to submit the completed questionnaire to the UK FMP

BREF representatives for verification. The verified questionnaire will then be submitted to the EIPPCB using BATIS - the Bureau's information portal.

Certain aspects of Tata Steel's submission may be commercially sensitive information. Tata Steel confirmed it would clearly state if any part of its submission should be treated as commercial-in-confidence (CinC) information.

The UK deadline for submission is 02/02/18, which Tata Steel is planning to meet.

During our discussion and review, two main issues arose:

1. The Hot Mill contributes a percentage of the overall steelworks effluent stream which is treated in Tata Steel's on-site Effluent Treatment Plant (ETP). The on-site ETP receives flows from other iron and steelmaking processes e.g. blast furnaces, so Tata Steel's site effluent system was not considered as a common waste water treatment facility for the purposes of completing this questionnaire.
2. The facility that maintains mill rollers within the steelworks is managed and run by Texturing Technology Limited (TTL). TTL's activities have historically not been regulated by NRW nor its predecessor organisation under the Environmental Permitting Regulations (EPR). The mill roll shop does not have a *technical connection* to the steelworks under EPR, so it does not form part of the steelworks installation under the regulations. TTL is a standalone facility of comparable status to the slag grinding (Hanson Cement) and the sewage treatment works (Dwr Cymru Welsh Water), both of which are within the steelworks site footprint but are not regulated by NRW as *installations* under the EPR.

Other matters

Permit variation V016 remains in draft. The delay in issuing a final draft for operator comment and public consultation was discussed.

NRW provided a short presentation on the principles and application of confidence intervals to measured continuous monitoring (CEMS) data.

[ENDS]

EPR Compliance Assessment Report

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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. 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.