

Compliance Assessment Report

Report ID:
CAR_NRW0033332

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	30/04/2018	Time in	10:00	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	See below				
Lead officer's name	Broom, Mark				
Accompanied by					
Recipient's name/position	Clare Grainger/ Environment Manager	Date issued	11/05/2018		

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
E5 - Emissions - Waste	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.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
-----------------------------	---	--	---

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

Dean Cartwright - CLS Manager (TSE)

Jeff Evans - Raw Materials Specialist (TSE)

Andrew Townsend - Iron works Environment Manager (TSE)

Mike Launder - Environmental Engineer (TSE)

Clare Grainger - Environment Manager (TSE)

Frank Dal Molon - RP Advisor (TSE)

Rouha Hussaina - Hydrocyclone Project (TSE)

Waste related issues

There are a number of legacy materials stored on the Port Talbot site. These materials include the Betsi lagoon material, BOS slurry and BOS Grit. GeoTech (a contractor for Tata Steel) carry out drone surveys on a three/four weekly basis and the results produce volume estimates of the raw material and other stockpiles across the site. These volumes are converted into tonnages based on the density of the materials being stored. Tarmac and Harsco may find this technique of use for their slag to get good estimates of their slag materials.

The BOS grit and slurry tonnages are largely stable – i.e. not decreasing or increasing. This stable position is as a result of the low zinc strategy that has been in place for a few years and being able to reuse nearly all current arisings. The estimates are between 0.8 and 1.2 MT of the BOS related stockpiles. The Betsi lagoon material is increasing at around 15% a year because this material cannot be utilised back into the iron and steel making processes because of the zinc content. Tata have around 0.25Mt of materials from the Betsi lagoon. Tata have developed a pellet production process that uses a number of streams including the current arising of BOS slurry and grit together with Hot mill sludge. The pellet process has

enabled the current arisings of these material to be largely used and not being added to the stockpiles.

The use of hydrocyclones will separate the contaminants present in the Betsi lagoon material stream. The changes on Naturally Occurring Radioactive material (NORM) thresholds mean that the use of hydrocyclones will produce a high iron fractions and high zinc fraction depending on the number of stages installed. The high zinc fraction is now not at risk of being classified as NORM. The three-month trial did show a separation of zinc and iron on the overflow from the furnace 5 to the Betsi lagoon. Furnace 5 was chosen because it has the larger flow to the Betsi lagoon due to the differences in configuration of the two furnaces. Tata will be seeking a second extended trial for this technology to help optimise the technique, use multi cyclone systems and to help justify installation on the second furnace.

Tata are looking at long-term solutions for the Legacy materials that include a Rotary Hearth Furnace. Discussions are ongoing with a technology supplier. Based on current designs and estimates, it will take around 10 years to recover and treat the amounts of legacy materials currently stored on site. If Betsi lagoon material could be processed through any hydrocyclone system, then this time frame could be reduced. Also, the changes to the Norm thresholds mean that the Betsi lagoon material could be landfilled providing it meets the Waste Acceptance Criteria (WAC) for the receiving landfill. Previously the NORM thresholds could have precluded some landfill disposal options.

Conclusions

The use of a low zinc strategy has stopped BOS materials being added to the BOS related legacy stockpiles. The changes of the NORM thresholds should enable Tata to install a hydrocyclone system without the risk of the streams becoming NORM and help maintain the current levels of legacy materials on site in a similar way that the low zinc strategy has had on the BOS related stockpiles. The Rotary Hearth Project is still under consideration, but other factors may hinder its use.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033332**

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	Date	30/04/2018

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.