

**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	30 June 2014		Time in	N/A	Out	N/A
What parts of the permit were assessed	Notification under permit condition 5.1.1a - see below <b>Quarter 2 2014: UR/14/02, UR/14/03, UR/14/04, UR/14/05, UR/14/06</b>					
Assessment	Check Monitoring/sampling	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Jason Heatman and Jamie-Ross Landeg, Safety, Health & Environment (SHE) Department					
Officer's name	Douglas Cowie		Date issued	07/05/2015		

**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**

Permit Conditions and Compliance Summary	Condition(s) breached
<b>a) Permitted activities</b>	
1. Specified by permit	N
<b>b) Infrastructure</b>	
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
<b>c) General management</b>	
1. Staff competency/ training	N
2. Management system & operating procedures	N
3. Materials acceptance	N
4. Storage handling, labelling, segregation	N
<b>d) Incident management</b>	
1. Site security	N
2. Accident, emergency & incident planning	N
<b>e) Emissions</b>	
1. Air	C3
2. Land & Groundwater	N
3. Surface water	N
4. Sewer	N
5. Waste	N
<b>f) Amenity</b>	
1. Odour	N
2. Noise	N
3. Dust/fibres/particulates	N
4. Pests, birds & scavengers	N
5. Deposits on road	N
<b>g) Monitoring and records, maintenance and reporting</b>	
1. Monitoring of emissions & environment	A
2. Records of activity, site diary, journal & events	N
3. Maintenance records	N
4. Reporting & notification	A
<b>h) Resource efficiency</b>	
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**

<b>Number of breaches recorded</b>	1	<b>Total compliance score</b> (see section 5 for scoring scheme)	4
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**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 steelworks 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

Condition 5.1.1(a) of permit BL7108IM requires the operator to notify the Environment Agency\* following the detection of an emission of any substance which exceeds any limit or criteria specified in the permit in relation to the substance.

Condition 5.1.1(c) requires the operator to notify the Environment Agency\* without delay of the detection of any malfunction, breakdown or failure of plant or techniques which has caused or may have the potential to cause pollution.

Condition 5.1.1(g) requires the operator to notify the Environment Agency\* following any unplanned unavailability of the Ministerstein coke side arrestment system.

Condition 5.1.2 requires the operator to submit written confirmation of any notification under condition 5.1.1 by sending the information listed in Part A of Schedule 1 of the permit within 24 hours of such notification, and the more detailed information listed in Part B as soon as practicable thereafter.

Condition 5.1.3(g) requires the operator to give written notification as soon as practicable of any unplanned unavailability of the Ministerstein coke side arrestment system.

Condition 6.1.2 requires that emissions to air from the sources specified in Table 6.1.2A - 6.1.2G shall not be exceeded.

NRW has received the following operator notifications concerning exceedances of permitted limits or unplanned Ministerstein unavailability which occurred during **Quarter 2 2014** (01 April – 30 June):

1. **UR/14/02** received on 03/04/14 – A9 Blast Furnace No. 5 casthouse FEP
2. **UR/14/03** received on 29/04/14 – A10 iron desulphurisation/hot metal pouring FEP
3. **UR/14/04** received on 22/05/14 – Sinter plant
4. **UR/14/05** received on 20/05/14 – A54 coke oven batteries (Ministerstein coke side arrestment)
5. **UR/14/06** received on 05/06/14 – A62 Boiler 3

### Compliance assessment

1. **UR/14/02A:** Schedule 1 Part A received 03 April 2014 (by email).  
Hourly average for particulates recorded at emission point A9:

Start time	End Time	A9 (mg/m3)
31/03/2014 16:00	31/03/2014 17:00	<b>25.7</b>
31/03/2014 17:00	31/03/2014 18:00	<b>25.4</b>

31/03/2014 18:00	31/03/2014 19:00	27.4
31/03/2014 19:00	31/03/2014 20:00	29.8
31/03/2014 20:00	31/03/2014 21:00	30.7
31/03/2014 21:00	31/03/2014 22:00	30.4
31/03/2014 22:00	31/03/2014 23:00	32.3
31/03/2014 23:00	01/04/2014 00:00	34.7
01/04/2014 00:00	01/04/2014 01:00	35.4
01/04/2014 01:00	01/04/2014 02:00	35.5
01/04/2014 02:00	01/04/2014 03:00	36.1
01/04/2014 03:00	01/04/2014 04:00	36.9
01/04/2014 04:00	01/04/2014 05:00	38.3
01/04/2014 05:00	01/04/2014 06:00	35.9
01/04/2014 06:00	01/04/2014 07:00	36.3
01/04/2014 07:00	01/04/2014 08:00	40.8
01/04/2014 08:00	01/04/2014 09:00	42.1
01/04/2014 09:00	01/04/2014 10:00	36.2
01/04/2014 10:00	01/04/2014 11:00	29.7
01/04/2014 11:00	01/04/2014 12:00	35.7
01/04/2014 12:00	01/04/2014 13:00	29.5
01/04/2014 16:00	01/04/2014 17:00	25.1
01/04/2014 19:00	01/04/2014 20:00	27.3
01/04/2014 20:00	01/04/2014 21:00	26.3
02/04/2014 19:00	02/04/2014 20:00	25.1
02/04/2014 20:00	02/04/2014 21:00	25.1
02/04/2014 21:00	02/04/2014 22:00	25.3

Results reported as measured using a Continuous Emission Monitor (CEM)

**A9: Blast Furnace 5 casthouse Fume Extraction Plant (FEP)**  
**Permitted limit is 25.00mg/m3 (hourly average)**

Part A operator comment: *Monitor checked and reading confirmed. Under investigation.*

The operator subsequently provided a Schedule 1 Part B notification containing the following additional information and representations in relation to these exceedances:

*PCME checked monitor and found a number of span issues, the concerns were rectified, followed by a quick calibration (07/4/14) check which resulted in a drop in the mg/m3/hr reading from >25 to ~18mg/m3/hr. The bags were checked and a 24 hr program of checking each compartment was initiated until the faulty compartment(s) could be identified.*

*The background level of 18mg/m3 was initially put down to ongoing bag issues. It was decided though to calibrate the monitor. The works sampling team took the samples and it was found that the monitor was reading too high. The initial calibration factor was 0.426 and the new factor is 0.155 and the level is running at between 5-10mg/m3. Therefore it has been concluded that the issues has been down to a monitor fault and no breach of consent occurred.*

The operator has identified that a monitoring fault resulted in elevated results being recorded at A9 between 31/03/14 and 02/04/14. We will review the operator's fume emissions monitoring system and monitoring frequency for emission point A9 during our next compliance visit to Blast Furnace 5. No non-compliance score has been applied to this particular event and it has not been entered onto our Compliance Classification System (CCS)\*\*.

2. **UR/14/03A:** Schedule 1 Part A received 29 April 2014 (by email).  
Hourly average for particulates recorded at emission point A10:

Start time	End Time	A10 (mg/m3)
26/04/2014 00:00	26/04/2014 01:00	65.84

Result reported as measured using a Continuous Emission Monitor (CEM)

**A10: iron desulphurisation / hot metal pouring Fume Extraction Plant (FEP)**  
**Permitted limit is 50.00mg/m3 (hourly average)**

Part A operator comment: *Shift reports indicate that fume in the hot metal bay had increased, so the bagging plant was placed on intensive clean prior to the breach. Our engineers have been informed and we will look to establish the root cause. Under investigation.*

We have not received any Schedule 1 Part B information from the operator for this exceedance. NRW has however reviewed the performance of the BOS Plant hot metal pouring FEP with the operator during other compliance interventions in 2014. Our findings have been detailed in separate CAR forms. Taking this into account we have decided not to score the failure to submit a Part B notification in this instance.

After applying the appropriate measurement uncertainty factor, this exceedance remains within the permitted limit of 50.00mg/m<sup>3</sup>. No non-compliance score has been applied to this particular event and it has not been entered onto our Compliance Classification System (CCS)\*\*.

3. **UR/14/04A:** Schedule 1 Part A received 22 May 2014 (by email).

Particulate release recorded at Sinter Plant following a conveyor failure and de-dust system shutdown. Particulate was emitted from the sinter plant building while the de-dust system was offline for two periods.

Start time	End Time
16/05/2014 19:00	16/05/2014 23:00
17/05/2014 12:30	17/05/2014 17:15

### **No emission limit values (ELVs) apply to fugitive emissions from the sinter plant building**

Part A operator comment:

*Environmental Incident Report 16th May, 19:00hrs*

*Due to the failure of 1074 chain conveyor, it was necessary to stop the de-dust fan to allow access into the chain conveyor to inspect and perform repairs.*

*1074 chain conveyor repairs made, but when testing the remaining chain conveyors prior to restarting the de-dust fan a further fault was noticed on 1070 chain conveyor. This chain conveyor opened up for inspection also, but we were unable to perform the repair. 1070 chain conveyor boxed up, permits cleared and de-dust fan restarted. 1070 chain conveyor and chamber will require clearing with vac unit once repairs have been completed.*

*Environmental Incident Report 17th May, 12:00hrs*

*De-dust fane switched off to allow de-dust chain conveyor to be earthed down and all relevant permitry taken to allow Dbi to vac 1070 chain conveyor out as chain conveyor had not run since start up after planned maintenance period which ended on 15/4/2014.*

The operator subsequently provided a Schedule 1 Part B notification containing the following additional information and representations in relation to this event:

*A decision to keep the plant running while the de dust fan was not running was taken on the perceived impact of shutting down the sinter plant and restarting was greater that it would by isolating the system for a period of time. However, there was no formal decision process in place to make this assessment.*

*There is an existing procedure in place to ensure compliance with the emission limit values. This has now been modified so that if a problem occurs on the dedust system that requires rectification then the Shift Coordinator must be informed of this situation who will then authorise the repairs to be carried out. The dedust fan can then be switched out of service and isolated to carry out repairs. The following decision tree should be used to assess if plant can be allowed to run: This has been discussed with the NRW.*

We have examined the operator's quarterly monitoring returns (Q2 2014) and note that the maximum recorded daily average (mean) result for particulates from the sinter plant de-dust stack (emission point A2) during May 2014 was within the permitted limit. NRW has also reviewed this event and the environmental performance of the de-dust system during a compliance inspection in June 2014. Our findings and compliance scores arising from this event have been detailed separately in **CAR form 5615**.

4. **UR/14/05A:** Schedule 1 Part A received 20 May 2014 (by email).

Particulates recorded at emission point A54. Coke pushing and associated emission took place while Ministerstein coke side arrestment system was offline.

Start time                      End Time  
20/05/2014 09:30      30/05/2014 (night shift)

**A54: Morfa Coke Oven batteries**  
**Multiple permitted limits for visible emissions (DLCF, TLCF, PEF, MEF)**

Part A operator comment:

*A length of rail in which the Ministerstein coke side arrestment system has failed in service and as a consequence has had to be immobilised making the system inoperable. The rail requires replacing and this is expected to carry out in the coming days, and the system will be put back into service.*

The operator subsequently provided a Schedule 1 Part B notification containing the following additional information and representations in relation to this notification:

*Inspection of the rails of the Hood and Duct are carried out on a weekly basis by KJG Price and has been integrated into the works maintenance system. On the morning of the Tuesday 20th May there was a failure of the east rail system for the hood. Production was delayed while initial assessments carried out, but had to resume pushing with the hood off-line. The NRW was informed that day. A survey was carried out by a specialist company on Wednesday 21st May. As the system was off-line, an opportunity to clean the hood was undertaken. Further issues were identified on the west rail that could lead to some future issues which were also addressed. The hood system was reinstated on the evening of Friday 30th May.*

We have examined the operator's quarterly monitoring returns (Q2 2014) and note that the results for DLCF, TLCF, PEF and MEF at Morfa Coke Ovens during Quarter 2 were within the permitted limits. NRW has also reviewed the environmental performance of the coke oven batteries with the operator during other compliance inspections in 2014 and 2015. Our findings from these inspections have been detailed in separate CAR forms. No non-compliance score has been applied to this particular event and it has not been entered onto our Compliance Classification System (CCS)\*\*.

5. **UR/14/06A:** Schedule 1 Part A received 20 May 2014 (by email).  
Daily average for oxides of nitrogen (NOx) recorded at emission point A62:

Start time	End Time	A62 (mg/m3)
22/05/2014 00:00	23/05/2014 00:00	<b>205.00</b>

Result measured using a Continuous Emission Monitor (CEM) corrected to 3% oxygen. Emission levels verified 5<sup>th</sup> June 2014.

**A62: Boiler 3**  
**Permitted limit is 200.00mg/m3 (hourly average)**

Part A operator comment:

*Due to planned maintenance Blast Furnace 4 was taken off-line which resulted in reduced Blast Furnace Gas output which become unavailable for Boiler 3 from 16:00hrs on 21st May to 14:00hrs on 23rd May. During this time, natural gas was used to supplement the boiler. On 22nd May a daily average of 205 mg/m3 was recorded exceeding the daily limit of 200 mg/m3. The daily average recorded on 23rd May reduced to 153 mg/m3 after Blast Furnace Gas was restored. NOx levels have since returned to normal levels. Cause of elevated NOx levels was use of natural gas due to Blast Furnace gas unavailability due to planned shutdown of furnace for maintenance.*

The operator subsequently provided a Schedule 1 Part B notification containing the following additional information and representations in relation to this exceedance:

*Emission levels have since been corrected for oxygen and water vapour and alarms levels amended to reflect actual permit levels. Further action required air fuel ratios during Natural Gas firing to prevent NOx formation. It is known that during nil BFG NOx levels may rise due to natural gas firing. However, this was not detected by the monitor as emission levels displayed in the control room are uncorrected. Alarms levels were based upon a typical levels of oxygen (~10%) for correction. Oxygen levels during breach were 18%. Emission levels have since been corrected for oxygen and water vapour and alarms levels amended to reflect actual permit levels.*

The operator has not specified if this result has been reported as measured or if the relevant CEM (instrument) uncertainty factor has been applied. We have therefore assessed the result on the basis that the uncertainty factor has been applied. This exceedance remains non-compliant with the permit limit and with Condition 6.1.2; a CCS Category 3 score has been recorded (CCS reference 231805).

[ENDS]

*\*In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.*

*You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency in Wales.*

*\*\*Natural Resources Wales currently applies the same regulatory tools and systems as the Environment Agency.*

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

Site	Tata Steel Port Talbot steelworks	Permit	EPR/BL7108IM
Operator/ Permit	Tata Steel UK Ltd	Date	07 May 2015

**Section 3- Enforcement Response** **Only one of the boxes below should be ticked**

<p>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.</p>	
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.	✓
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			
n/a	n/a	n/a	n/a

## 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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](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) 601 0987**.