

Compliance Assessment Report

Report ID:
CAR_NRW0022711

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

Site	Shotton Works EPR/BR7321IK/V006		Permit Ref	BR7321IK	
Operator/Permit holder	Tata Steel UK Limited				
Regime	Installations				
Date of assessment	01/06/2016	Time in	10:00	Out	16:00
Assessment type	Audit				
Parts of the permit assessed	OMA Water				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Peter Shephard/ Senior Environment and Energy Officer		Date issued	22/07/2016	

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
C1 - General Management - Staff competency/training	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	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	A	
G4 - Monitoring and Records, Maintenance and Reporting - 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

On the 1 June 2016, an Operator Monitoring assessment (OMA) water was undertaken at Tata Shotton. A very high score of 97% was achieved by Tata, demonstrating a high level of management control over emissions to controlled waters. Details of the OMA can be found in the attached report.

Aside to the OMA the following over issues were discussed:-

Tern Lagoons - comprehensive work is being carried out by Tata to find an alternative source of water for the Tern lagoons if the installation of the cooling towers and cessation of the quench water discharge to Tern lagoons is to go ahead. Tata ran through a demonstration of the viable options whilst on site. Tata are investigating several drainage areas on site which may be rerouted to the Tern Lagoons. Tata to update on these drainage areas, once investigation has been completed.

Thermal Regenerative Oxidiser (RTO) Removal - Discussions were held around the possible removal of the RTO from emission point A12. At A12 the RTO abates VOC emissions extracted from the quench tank. During the discussion NRW confirmed that if Tata could meet the emission limit value for VOC's from this stack without the RTO then NRW would have no objection to its removal. Tata are monitoring VOC emissions from the stack during worse case condition for VOC's, ie. when using high solvated paints. Tata to report back to NRW when this emissions monitoring has been completed. This RTO removal would need to be incorporated into a permit variation. NRW confirm that in accordance with the following guidance note that the emission limit for VOC waste gases from a contained source would be 50mg/m3.

Sector Guidance Note SG6 (11), Secretary of State's Guidance for Surface Treatment Using Solvents, Integrated Pollution Prevention and Control, February 2011.

Chrome Free Project - a briefing was given on the progress made to date with ceasing the use of chrome in the coating process. It would be beneficial if Tata could send a briefing note to NRW on the chrome free project for the cessation of chrome use both in the galvanizing and coating process by 2017 sunset date under the REACH regulations.

EPR Compliance Assessment Report

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Operator/Permit holder	Tata Steel UK Limited	Date	01/06/2016

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.

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.

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.