

	EPR Compliance Assessment Report	Report ID: BR7321IK/0234032			
This form will report compliance with your permit as determined by an NRW officer					
Site	SHOTTON WORKS		Permit Ref	BR7321IK	
Operator/ Permit holder	Tata Steel UK Limited				
Date	16/02/2015		Time in	10:00	Out 15:00
What parts of the permit were assessed	General Inspection/Meeting to discuss new passivation line				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Peter Shephard				
Officer's name	Matthew Kelk		Date issued	05/03/2015	

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
a) Permitted activities	1. Specified by permit	N			
b) Infrastructure	1. Engineering for prevention & control of pollution	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	A			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	N			
	3. Materials acceptance	N			
	4. Storage handling, labelling, segregation	A			
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	A			
	2. Land & Groundwater	N			
	3. Surface water	N			
	4. Sewer	N			
	5. Waste	A			
f) Amenity	1. Odour	N			
	2. Noise	N			
	3. Dust/fibres/particulates	N			
	4. Pests, birds & scavengers	N			
	5. Deposits on road	N			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N			
	2. Records of activity, site diary, journal & events	N			
	3. Maintenance records	N			
	4. Reporting & notification	N			
h) Resource efficiency	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 (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 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

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Meeting held with Peter Shephard and Steve Hughes (Tata) to discuss the future installation of new chrome free passivation line, followed by a general inspection of both Galvanising lines.

New Passivation Line

New chrome free passivation coating (Primecoat Z) to be used on Galv 6 with the installation of new passivation tank and associated application equipment, accumulator and extraction systems. To be fitted Autumn 2015

The Primecoat Z is already in use on Galv 5 line, occupational health tests have been undertaken next to the baths on Galv 5 passivation tanks and low levels of pollutants have been shown.

An analysis of the MSDS for Primecoat Z was carried out with Peter Shephard and Steve Hughes, hazardous components listed are:-

Polyphosphoric Acids,
Nitric Acid,
Phosphoric Acid,
Pyrophosphoric Acid.

Historically the emissions from the passivation tanks on the Galv lines have been directed to wet scrubbers due to the chrome content of the passivation coating. Tata plan to carry out air testing pre and post scrubber for the above contaminants from Primecoat Z coating. This is to be carried out on Galv 5 line due to the ease of testing.

These tests will indicate whether air from the new Galv 6 passivation tank will need to be extracted to atmosphere, it may be possible to exhaust indoors. If low levels of pollutants are indicated by the tests, Tata propose to remove the scrubber columns. This will also indicate to Natural Resources Wales whether an emission limit value will need to be applied to an exhaust points from the passivation lines.

Discussions were held with the project manager for the new passivation tank, it was asked whether any nitric acid fume would be created, particularly if the passivation tank coating increased in temperature. It was confirmed that the tank are generally room temperature and that the steel coils enter the tank at around 30c. As such unlikely to be warm enough to liberate significant amounts of nitric acid fume that would need to be abated.

Tata to forward results of air testing on Galv 5 line passivation tank upon completion.

Industrial Emissions Directive (IED)

Currently the effluent treatment plant (ETP) is listed as a directly associated activity of Galvanising and Surface Coating listed activities, under IED the ETP will become a listed activity in its own right - Tata to confirm daily volumes of treated effluent at the plant.

Discussions were held regarding the aggregated thermal input of all remaining boilers on site and whether the aggregated volume is still above 50MW threshold for an A1 activity under IED. Tata to confirm aggregate thermal inputs of all boilers on site.

General Inspection

General inspection of the Galv lines was undertaken, particular attention was paid to the raw materials store and the waste storage areas.

Zinc ingots kept under cover near to Galv lines. Passivation coating kept at various points around factory area, all kept within designated bunds. Engineering oils kept within own bunded store. All storage and containment fit for purpose.

Waste area inspected - all wastes within undercover area within factory, all liquid wastes kept within individual IBC bunds - all fit for purpose.

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Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	☐
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.	☐
We will now consider what enforcement action is appropriate and notify you, referencing this form.	☐

Section 4- Action(s)			
Where 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			

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 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 fulfill 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 (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.

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 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. 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.