Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: BR7321IK/0250206

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

Site	Shotton Works EPR/BR7321IK			Permit Ref	BR7321IK	
Operator/ Permit holder	Tata Steel UK Limited					
Date	07/10/2015			Time in	10:00	Out 15:00
What parts of the permit were assessed	Solvent Emissions					
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op	Water Discharge	
Recipient's name/position	Peter Shephard (PS)					
Officer's name	Matthew Kelk			Date issued	03/11/2015	

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)	A		
	4. Containment of stored materials	A		
	5. Plant and equipment	A		
c) General management	**1**. Staff competency/ training	A		
	2. Management system & operating procedures	A		
	3. Materials acceptance	N		
	4. Storage handling, labelling, segregation	N		
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	N		
f) Amenity	**1**. Odour	A		
	2. Noise	A		
	3. Dust/fibres/particulates	A		
	4. Pests, birds & scavengers	A		
	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

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.

An audit/inspection was carried out 7 October 2015 mainly concentrating on solvent emission control from the 2 Coating Lines at Tata Shotton.

Initial discussions were held around the reporting requirements as a solvent emissions activity under the Industrial Emissions Directive (IED).

As a Solvent Emissions Activity under IED Tata take the compliance option of meeting VOC emission limit value from waste gases and a fugitive emissions value expressed as a percentage of solvent input.

NRW and Tata ran through the principles behind the solvent management plan (SMP) as listed under section part 7 Annex VII of IED. Fugitives are calculated under SMP through a mass balance equation.

Tata currently send in a letter report on fugitives emissions form the 2 Coating Lines on an annual basis. Site currently puts together a monthly spreadsheet which is used to calculate the fugitive emissions from site.

Tata were advised that NRW are reviewing their environmental permit to ensure that it reflects fully the requirements of a solvents emissions activity under IED. Following discussions on site, the likely change would be the way Tata report fugitives and this would be via a SMP which Tata already carry out in the monthly spreadsheet.

The following control techniques were inspected on the site walkover:-

<u>VOC Control</u>

<u>Storage</u>

All Solvent materials (coatings) were observed kept in racked stores next to the paint kitchens in sealed containers avoiding any fugitive solvent emissions from storage.

Mixing tanks for the coatings are held within the paint kitchen, vessels are kept closed to minimise fugitives.

<u>Paint Application</u>

Coatings are applied within sealed booths and VOC laden air is extracted to the Regenerative Thermal Oxidiser (RTO) before being exhausted via the stack. Rooms are kept fully enclosed at all times to ensure that fugitive VOC emissions leave the booths.

The paint coating lines will require cleaning when changing paint colours, cleaning is carried out in the booth, Tata have initiated reduction in solvent use for cleaning in the fact that only a small slug of solvent is allowed to be used for cleaning and recycled until contaminated.

<u>Wastes</u>

Any waste rags/wipes containing solvent are kept in bins with fitted lids to keep fugitives to a minimum.

All waste materials are kept in a designated outdoor waste area next to each of the coating lines, wastes are generally kept in sealed IBC's before being taken off site by a designated waste carrier. The area was visited during the inspection, all waste containers were lidded to control fugitive VOC emissions.

The waste areas are bunded on several sides, the entrance to the bunded area are served by a drainage channel. Tata were questioned if a spillage occurred in this area where the drainage channel leads to. In both waste areas the drainage channel leads to a 4 stage tank inceptor. Tata consider that if the spillage is not captured at source then these tanks would capture any spillage. These tanks would then be pumped out by a tanker.

Site were asked what spillage kits they had on site for any solvent spillages, PS showed the locations of all spillage kits on site, different levels of kits are available depending on the location.

Operational Procedures

Several procedures with regards to solvent control were audited during the inspection, including the procedure for disposal of hazardous waste and procedure for spillages on site, all appeared fit for purpose.

Site were asked what training operatives received with regards to procedures and in particular spillage training for operatives working in the solvent waste area. Training is triggered by the site Environmental Management System(EMS). The site use a computerised system which flags up to team leaders when a procedure has been changed and training can be then given to that team.

Operatives within the coaterhouses are required to carry out best practices and training is given by team leaders on an ad hoc basis.

Procedures are reviewed on an annual basis and/or if a change needs to be made and the computerised EMS system will trigger site staff training.

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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.	X
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.