

Compliance Assessment Report

Report ID:
CAR_NRW0032321

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	14/09/2017	Time in	10:00	Out	16:00
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Kelk, Matthew				
Accompanied by					
Recipient's name/position	Peter Shephard/ Senior Energy and Environment Officer		Date issued	23/10/2017	

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
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B5 - Infrastructure - Plant and equipment	A	
E1 - Emissions - Air	A	
E3 - Emissions - Surface water	C3	2.2.5.1
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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

An inspection at Tata Shotton was undertaken on the 14 September 2017 by Industry Regulatory Officer Matthew Kelk

The following issues were discussed as outlined below:-

Project Cobra

A presentation was given on the installation and commissioning of Project Cobra, intermediate coating line, ovens and RTO . At the time of inspection the line colourcoat line 1 with Project Cobra configuration has been running for approximately 2 weeks.

Results were shown for emissions from the Regenerative Thermal Oxidiser (RTO)

VOC < 5mg/m³

Carbon monoxide 10 - 50 mg/m³

NOx 20 - 60 mg/m³

All below emission limit values within NRW permission letter dated 19 September 2017 giving Tata permission to run colourcoat line 1 in Project Cobra configuration prior to permit variation approval by NRW.

Spray-bar installation

A presentation was given on the spray installation to colourcoat line 1. Spray bars now being used with computer control. Lessons learned from this installation will be transferred to the prime and finish quench.

Tern Lagoon

An update was given on the works to the Tern lagoons, contractors quotes have been obtained for the works to the dams and western weir. Upon approval of the Habitats Risk Assessment (HRA) by NRW conservation officer for the current permit variation, then works will begin.

Fishing Lake Discharge

Detailed discussion were held around the requirements of Tata to discharge the colourcoat line 2 quench water to the on site fishing lakes. PS and HP ran through the plan,

Action

Tata to forward chemical analysis results, thermal loadings and fish type to NRW upon completion of sampling.

ETP Update

Discussions were held over future plans for the Effluent Treatment Plant (ETP). Capex for phase 2 includes pH control alarms and continuous emission monitors for Zinc. There are future plans for larger plant utilising similar plant to that of pilot plant.

Discussions were held around elevated zinc from ETP discharge sample point, Tata are to investigate as originally specified in monitoring review CAR form NRW0032145 issued 19 September 17. Noted that this is not a permit compliance point, which is at the Broken Bank Drain.

Waste Audit

An audit was undertaken of waste transfer certificates and hazardous waste consignment notes for the following waste streams on site:-

Metals,

Solvents,

Paint sludges,

Filter cake waste,

Oils.

A representative was made available from Veolia who was able to supply all correct documentation when asked.

Emission to surface water

Condition 2.2.5.1

Subject to condition 2.2.5.2 below, the Operator Shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to water (other than Groundwater) and sewer from the Permitted Installation in particular from:

- All structures under or over ground

- Surfacing

- Bunding

- Storage Areas

provided always that the techniques used by the Operator shall be no less effective than those described in the Application, where relevant.

On the 14 May 2017 an emission of chrome at 0.9ppm was detected entering the Tern lagoons via one of the quench discharge outlets. Upon detection penstocks were activated and the chrome levels in the lagoon were monitored. 7 tonnes of contaminated water held back by penstock removed from site. Part B of Schedule 6 received 15.06.2017. An investigation was carried out by Tata but no known source could be found. This was further discussed during the inspection.

This is unlikely to pose a risk going forward as chrome has now been phased out as a passivation due to REACH Regulations.

Fugitive emissions to the Tern lagoons breach of condition 2.2.5.1 scored one category 3 score for this breach.

EPR Compliance Assessment Report

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Operator/Permit holder	Tata Steel UK Limited	Date	14/09/2017

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.

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.

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			
E3	C3	Investigation carried out, no further action required. See text for details.	23/10/2017

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.