

Compliance Assessment Report CAR_NRW0040600

Permit being assessed: BL7108IM.

For: Port Talbot Steel Works , held by Tata Steel UK Limited

At: Tata Steel Strip Products UK , PORT TALBOT, PORT TALBOT,
WEST GLAMORGAN, SA13 2NG.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 20/10/2022 between 09:00 and 14:00.

Parts of permit assessed: Stockyard Inspection

NRW Lead Officer: Rhodri Morgan, accompanied by Ffion Thomas.

Report sent to: Nathan Ace , Environment Manager on 07/11/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Introduction

Tata Steel UK Limited (Tata) operates the Port Talbot Steelworks in accordance with Permit BL7108IM. The Steelworks has several identifiable processes which are carried out sequentially across the installation to convert raw iron ores and coal to semi-finished (slab) and finished steel products.

This site visit was planned to act as an introductory visit following the allocation of new NRW regulatory officers. Visits were made to the Stockyards and Cold Mill to familiarise the officers with site operations.

The inspection also included a review of the duct control measures within the Stockyards, following the drought experienced throughout summer.

Stockyard Inspection

NRW met with representatives of the Stockyards who provided an overview of area operations including environmental management control measures and visits to key sections of the site.

The stockyards were observed from the observation tower where numerous material and vehicle movements were witnessed. No evidence of dust lift-off was observed from any of the raw material stockpiles, conveyors, or haul roads.

A demonstration of the CCTV system was provided which is used to monitor dust management throughout the stockyards. Additional CCTV points are planned for each wheel wash within the area to ensure the dust control measures are being utilised effectively.

A visit was made to the deep-water harbour where NRW officers observed the unloading of Coke from a moored cargo vessel. No notable dust emissions were observed during the unloading or from the conveyors transporting material to the site.

Throughout the visit, bowser and yard sweeping units was observed, with the primary haul roads found to be clear of debris and mud. Both bowser filling points within the area (Burdening and Blending) appeared to be operational.



Figure 1 – Stockyard Surface

No ponding of drainage system, with road clear of debris.

No evidence of dust lift-off from raw material stockpiles.

The drainage system appeared to be functioning correctly with no evidence of ponding water (Figure 1). Tata provided evidence from their SAP (Maintenance) system that the drainage system is regularly serviced, including the sumps within the main yards and the drainage systems emission point (W4).

Fugitive Dust Management and Control (Stockyards)

A latex-based dust suppressant is applied to raw materials to manage and prevent dust lift off. The application is linked to Tata's EMS and the areas AQMP procedures, with additional measures taken dependent on the weather forecast and daily air communications.

NRW officers inspected a selection of "stockpile monitoring/latex reports" which detail daily latex applications and visual observations of the stockpiles. The documents show that additional applications of latex occurred on days where potential dust lift off was observed (e.g., 18/07/2022).

Each wheel wash (6) within the area was operational during the visit apart from one where civil works were

being undertaken during a planned maintenance stop. The cleaning/ maintenance schedule for 2022 was provided along with the SAP records of selected weeks (Weeks 23, 29 and 32). Each wheel wash is also linked to the area control room to allow for reactive maintenance.

The Air Quality Management Plan (AQMP) for the steelworks details the measures to be taken to limit potential atmospheric emissions of PM₁₀ and fugitive dust. The measures include the effective communication of the risk to key stakeholders via a series of alerts which also detail the required area response.

Tata provided NRW officers with the Daily Air Quality Communication Sheets from a series of selected dates. The dates were selected based on observed dates where PM₁₀ concentrations at the AURN in Port Talbot exceeded 50 µg/m³ and to coincide with periods of prolonged dry weather.

The provided communication sheets highlight the measures listed within the AQMP were followed for the selected dates. Medium and high alerts were sent out when there was a risk of a localised PM₁₀ breaches, which included requests for feedback from the individual work areas and contractors. Feedback was also sought following confirmed breach days which was subsequently incorporated into Tata's PM₁₀ breach report.

Cold Mill Inspection

NRW met with representatives of the Cold Mill and Energy department who provided an overview of the Cold Mill and the Cold Mill Effluent Treatment Plant (CMETP).

The Cold Mill was on a planned maintenance stop during the visit, allowing for a walkthrough of the main building.

Plans are in initial development for the installation of a new process line. NRW advise that Tata consider the Ferrous Metals Processing Industry BREF (Final Draft) as this will apply to the Cold Mill following its publication.

The CMETP is currently undergoing significant investment, with Tata committed to a maintenance plan to improve the performance of the facility. Planned improvements/ maintenance include:

- Replacement of oily sludge tank
 - Replacement tank will be of a similar design but with modifications to allow for easier maintenance (sludge removal etc.).
- Filter Press Cloths
 - Cloths on both filters have been replaced and stock levels increased to allow for future replacements.
- Roof Replacement
 - Funding is in place for the replacement of the CMETP roof following extensive storm damage experienced in February 2022.
- Tank Inspections
 - Integrity inspections and cleaning of key assets such as the clarifier tank.
- Pump House
 - General building maintenance and pump/pipework improvements.

The contract for the running of the CMETP was awarded to Hargreaves Industrial Services Limited (Hargreaves) on the 14th September 2022. They take over from the previous contract holders; Industrial Chemicals Limited (ICL).

The contract includes provision for the sale of Ferrous Chloride Solution (FCS) with the aim of reducing the quantity required to be processed through the effluent treatment plant each year. Additional FCS tanks are also planned, increasing the storage capacity to allow for the more gradual processing of FCS through the plant.

Discussions between Hargreaves and Tata are ongoing regarding who will take ownership of the permit (AB3192HQ). NRW encourage both parties to utilise the information contained within [RGN 1 - Understanding the meaning of 'operator'](#), when reaching this decision.

If you have any queries about this report, please contact the NRW officer named above.

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Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.