

Compliance Assessment Report for: CAR_NRW0037782

Permit number	BV7311IE	Operator name	Tata Steel (UK) Ltd.
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Site name	Morfa Non Hazardous Landfill
Site address	Morfa Landfill, Port Talbot Steelworks, Port Talbot, SA32 2NG
Type of assessment	Report Review

Date of assessment	12 th March 2021
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Parts of permit assessed	Recharge Trench Report – NRW acceptance and inclusion in permit operational techniques.
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NRW Lead officer	Neil Herbert	Accompanied by	N/A
Report sent to – Name and position	Nathan Ace SHE Manager	Date	12 th March 2021

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
A1 Specified by permit	Assessed or assessed in part (A)	

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

Total number of non-compliances recorded
0

2. What action is required?

Criteria	Action needed	Complete by
	No specific action specified	

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

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

No non-compliances were recorded during this assessment

4. Details of our assessment

Acceptance of proposed changes to Recharge Trench management – Operating Techniques

In 2020 Tata completed a review of the site's recharge trench surface water distribution system. The findings and recommendations were documented in a report and submitted to Natural Resources Wales (NRW) for comment. In addition to a review of the current system, the report also included a proposed alternative strategy for the operation of the recharge system, moving from an actively pumped system to a passively driven one.

NRW can confirm that the proposed change (to a passively driven recharge system) is acceptable, subject to a periodic review of the system's effectiveness¹.

The accepted submissions consist of the following documents:

- ***MORFA LANDFILL RECHARGE TRENCH - Review of Progress - Report Number 2040r1v1d1020***
- ***Revised Drawing 2040/6 (Received 11th November 2020)***

In accordance with Condition 2.3.1a of your permit, these submissions are now included in your permit's operating techniques (Table S1.2) – see overleaf. These changes will be formally included in the permit document when the permit is next varied².

The acceptance of these submissions does not discharge the pre-operational and/or other requirements set out in this site's permit (e.g. pre-operational condition 1 and 3).

NOTE: The operator has also submitted a CQA plan (and specification) for the construction of the next section of the recharge trench (Trench C) and including some modifications to the existing recharge Trench Infrastructure. These are currently being reviewed by NRW and we will comment on these separately.

¹ This will be routinely reviewed as part of the annual interpretation report – unless otherwise agreed with NRW.

² An application to vary the existing permit has already been submitted to NRW and is awaiting duly making assessment.

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	The response to questions 1.2, 2.1, 2.2, 2.3, 2.4 and 2.5 in part B of the Application Form	9 October 2003
Response to request for information by email	Request to include additional waste type EWC 11 01 10 and Shotton Filtercake Basic Characterisation. (Amendment to Table 39 of application) (PAS Ref: 118198 and 118200)	3 December 2004
Response to request for information by letter	Drawing Number 244 Drawing 08 dated May 2003 'Basal Liner Details' Replaced with Revised Drawing Number 244 Drawing 08 dated January 20 th 2004 and Drawing Number 244 Drawing 02 dated May 2003 'Planning and PPC Permit Boundary' replaced with revised Drawing number 244 Drawing 02 Revision 1 dated December 2003	14 January 2004
Regulation 16 change	Letter from Corus, dated 1 st April 2005 (ref: PPC/Landfill/Morfa_Nhaz_1.4.05) for addition of Cold Mill Filtercake (11 01 10) to permitted waste types. Acknowledged by the Agency 11 April 2005.	3 April 2005
Response to Improvement condition 2 of original permit	Submission from L.A. Boorman, Dated July 2005, Sea Buckthorn Control Plan ("Control Plan for Sea Buckthorn at the Morfa Closed Landfill Port Talbot") accepted following CCW consultation	9 August 2005
Response to Improvement condition 1a and 1b of original permit BV7311IE	Letter From Corus (Reference PPC011) regarding Leachate Management. Approved by the Agency on 9 November 2005	28 October 2005
Response to Improvement condition 7 of original permit BV7311IE	Geotechnology Plan (Reference:- 399 Drawing B, Date 07.06) Establishment of a Buffer Strip. Accepted 1 August 2006 following CCW consultation	21 July 2006
Variation Application KP3033MC	The response to questions 1.1, 1.2, 1.3, 1.4, 2.1, 2.2, 2.7.1, 2.7.2, 2.7.3, 2.9, 3.1, 4.1 in Part C of the application.	14 August 2006
Further Information	Letter from Corus, dated 11 th July 2006 (ref: PPC/Landfill/VariationJUL06)	14 July 2006
Further Information	Geotechnology Report (Report Number 447.1/0/0606).	14 July 2006
Further Information	Geotechnology report (Report Number 451.1/2/0806), dated August 2006	22 August 2006
Further Information	Letter from Corus, dated 25 th August 2006 (ref: PPC/Landfill/VariationAug25_06)	8 September 2006
Response to Improvement condition 3 of original permit BV7311IE	Geotechnology Report (Report Number 403.1/1/1006).	Dated November 2006
	Letter from Corus (including attachments), (ref:RAL.IPPC.77). Revised Figure 2 "Current & Proposed Monitoring Network" Revision 0, ref. 403.1/10/1006.	Dated 22 January 2007
	Geotechnology Report (Report Number 528.1/0/0307).	Dated March 2007
	Letter from Geotechnology, (referenced: 244Permit_It1/BRkp).	Dated 4 May 2007
Response to Improvement condition 4 of original permit BV7311IE	Geotechnology Report (Report Number 403.1/1/1006).	Dated November 2006
	Letter from Corus (including attachments), (ref:RAL.IPPC.77). Revised Figure 2 "Current & Proposed Monitoring Network" Revision 0, ref. 403.1/10/1006.	Dated 22 January 2007
	Geotechnology Report (Report Number 528.1/0/0307).	Dated March 2007
	Letter from Geotechnology, (referenced: 244Permit_It1/BRkp).	Dated 4 May 2007

Table S1.2 Operating techniques

Description	Parts	Date Received
Pre Operational condition Submission for the waste treatment plant	Geotechnology Report- Working Plan for the Morfa Waste Treatment Centre Ref:- 512.1/0/0107. Dated January 2007	10 January 2007
Pre Operational condition Submission for the waste treatment plant	Drawing 3 Morfa Waste Treatment Centre- Drainage Details Revision 1, 512.1/0/0107;	14 March 2007
Pre Operational condition Submission for the waste treatment plant	Validation Report submitted with Geotechnology Letter (ref 512/lt1/aj/kp and dated 14 th February 2007)	14 th March 2007
Pre Operational condition Submission Slag Sampling Protocol	Geotechnology Letter (ref:- 569/lt3/ET/kp and dated 19 th July 2007)	Dated 19 July 2007
Regulation 16 change for the waste treatment plant	Letter from Corus (ref:BV7311IE) enclosing amended Plan (Figure 4 - Sub-divisions of waste treatments plant" Plan) namely:- Plan Reference: 496.1/0/0906 Revision 1 has been replaced by Plan Reference: 512.1/3/0607, Revision 3.	20 th September 2007
Regulation 16 change	- Letter from Corus (ref: mnh/bv7311ie/reg16) - Geotechnology Report (report number 658.1/0/0208)	13 th march 2008
Revised Dust Monitoring Plan & New Limits	Letter from Corus (ref:Landfill_003).	Dated 28 th September 2007 (Received 28 th September 2007)
Minor Operational Changes to the Landfill Permit	Letter from Corus (ref:PPC/Landfill/LW) Inclusion of new waste code into List of Permitted waste	Letter dated 24 th June 2008
Minor Operational Changes to the Landfill Permit	Letter from Corus (ref:Landfill_017) enclosing details of minor changes and amendments: - Updated Monitoring Point Location Plan (471.2/0/0408 MSP M02- Revision 0); - Plan showing the location of gas vents and leachate wells in Biodegradable Cells (65.1/0/0408, Figure 2 –Revision 0); - Updated Monitoring Point Register (ML/WL Environmental Monitoring –Location of monitoring installation/Rev1 Tables 1 to 6); - Changes to Leachate Control Levels - Consolidation and amendments to the leachate Monitoring frequency and reporting; - Revision of Dust monitoring limits - Revised gas limit for GA16 - Consolidation and amendments to the Groundwater Monitoring frequency and reporting; - Consolidation and amendments to the Surface Water Monitoring frequency and reporting; - Incorporation of Changes to surface water control Levels	Letter dated 13 th June 2008 (Received 23 rd June 2008)

Table S1.2 Operating techniques

Description	Parts	Date Received
Response to Improvement condition 6 of original permit BV7311IE	- Geotechnology report 495.1/0/1206. Recharge Trench Design Report. 18 December 2006 - Geotechnology letter response (ref: 542/Recharge Trench Report/lt1 (Note: This letter was incorrectly dated 11 July 2006 – should have read 2007). - Geotechnology Report: Morfa Non Hazardous Landfill Cell 1 Restoration Scheme Report Number 629.1/0/1207 December 07.	20 th December 2006 12 th July 2007 13 th February 2008
Minor Operational Changes to the Landfill Permit	Geotechnology Report (Reference T22R1V1D0908) <i>Landfilling Filter Pressed Filter</i> – Dated: September 2008	Report Received 10 th October 2008 Approved 28 th October 2008
Minor Operational Changes to the Landfill Permit	Letter from Corus (ref: PPC/Landfill/LW/Feb09) Waste Handling Procedures for conveyor belt waste.	Letter Received 27 th February 2009 Approved 3 rd March 2009
Hydrogeological Risk Assessment – Four Year Review	Geotechnology Report: "Four year review of Hydrogeological Risk Assessment" Report Number 711r1v1d0908	Report Received 18 th December 2008 Approved 31 st July 2009
Minor Operational Changes to the Landfill Permit	Letter from Corus (ref: PPC/Landfill/bv7311ie/jul08) reclamation of materials	Letter dated 24 th July 2009 Approved 28 th July 2009
Completed improvement condition requirement	Morfa Landfill Port Talbot, Review of MNHL Copper Trigger Levels, Report Number 990r1v1d0610 dated June 2010.	19 June 2010
Application	Proposed biocell extension and recovery of material from non-hazardous cell 1. Substantial variation report –	9 th November 2018
Hydrogeological Risk Assessment – six year review	Geotechnology Report: "MORFA NON-HAZARDOUS LANDFILL PORT TALBOT ENVIRONMENTAL PERMIT BV7311IE Review of Hydrogeological Risk Assessment Report Number 1739r1v1d1217" - December 2017, and;	2 nd December 2017
	Additional Information and clarification provided in Tata email , Dated 14 th April 2020 13:07.	14 th April 2020 Accepted: 16 th June 2020
Modifications to Recharge Trench System	Geotechnology Report: MORFA LANDFILL RECHARGE TRENCH - Review of Progress - Report Number 2040r1v1d1020	Report Received 5 th November 2020
	Revised Drawing 2040/6	Received 11 th November 2020 Accepted 12 th March 2021

End of section 4

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

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

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, formal caution or warnings. We may also take a protective response to a permit non-compliance and this can include 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.