

Compliance Assessment Report CAR_NRW0042180

Permit being assessed: BL5636IF.

For: Port Talbot Steel Works , **held by:** TARMAC TRADING LIMITED

At: Abbey Works, Margam, Port Talbot, Neath Port Talbot, SA13 2NG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/07/2023 between 09:00 and 12:30.

Parts of permit assessed: Site Inspection.

NRW Lead Officer: Rhodri Morgan.

Report sent to: Thomas Lloyd, Operations Manager - Port Talbot Works, on 24/07/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Management - General management	Assessed (A)	
IR3G - Emissions and monitoring - Air quality management plans	Assessed (A)	
IR1F - Management - Multiple operator installations	Assessed (A)	
IR4A - Information - Records	Assessed (A)	

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

Total 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**

The main purpose of the Tarmac activities at the Port Talbot installation are to serve the Tata Steel UK Limited (TSUK) steelworks processes (EPR/ BL7108IM). These activities are directly associated with steel production and include slag handling and granulation.

This was a pre-arranged familiarisation and introductory visit following the allocation of a new NRW regulatory officer.

Attendees**Tarmac**

Thomas Lloyd – Operations Manager, Port Talbot Steelworks
Ricky Guest – Operations Manager, South Wales

NRW

Rhodri Morgan – Senior Officer, Industry & Waste Regulation

Site Visit

An introductory meeting was held where Tarmac representatives provided a general overview of site operations; including the operators part in the wider steelwork's installation.

There are parts of the Tarmac ring-fenced site which interface closely with permitted activities undertaken by TSUK and other steelworks contractors. These areas are discussed in Section 1 (Management) and displayed in Schedule 7 of the installation permit.

Tarmac's role primarily involves providing support to the Blast Furnaces in the form of slag management (granulation and further processing). Steel slag is also processed; after the material has been de-metalled by Harsco under a separate permit (BP3635MR).

Following processing, the slag aggregates are temporarily stored within the main section of the Site, before being transported to either the wharf or rail yard for export. Slag aggregates have valuable properties that can be used in construction, infrastructure and agriculture.

Dust Management

Operations which have the ability to generate fugitive dust across the Site were discussed including:

- Crushing operations
- Screening operations
- Haul roads

- Material handling
- Slag and aggregate storage
- Granulation Plant conveyors

The locations of these operations are listed within a site plan (Site Plan – Dust Hot Spots), with the abatement measures used to control fugitive dust emissions documented within the sites AQMP and dust risk assessment (RA240119).

The dust abatement measures utilised by the operator were discussed, including planned improvements to the Sites' water bowser filling point which will reduce the filling time from 40 minutes to approximately 6 minutes.

Plans are also in place to extend the water suppression system installed throughout the main haul road; this will reduce the reliance on bowser movements and ensure dust abatement measures can be rapidly mobilised.

Site records from the week commencing 3rd July 2023 were inspected. The documents showed that dust abatement measures such as daily haul road inspections and dust inspections had been completed in line with the site's procedures.

Air Quality Management Plan (AQMP)

A brief discussion was held regarding the latest version of Tarmac's AQMP (V13) which was updated in June 2023. The Tarmac AQMP forms part of the overarching plan for the wider steelwork's installation which is managed by TSUK's Sustainability and Environment Team.

Tarmac representatives explained the procedures which are followed in response to air quality alerts, including the operators reporting requirements. Whilst a detailed examination of the AQMP was not undertaken, it was clear that Tarmac understood their responsibilities and ensure suitable resources are provided to enable its effective implementation.

Site Tour

NRW Officers were provided with a tour of Tarmac's permitted areas; including the "satellite" areas situated throughout the Steelworks. The following locations were visited:

- Main Yard
- Blast Furnace Slag Stockpiles and Crushing Operations
- Steel Slag Stockpiles, Tips and Crushing Operations
- Slag Granulation Plant
- Rail Yard Area

Whilst a detailed inspection was not undertaken, observations made during the site tour did not identify any apparent permit breaches. No evidence of dust lift-off was noted throughout the Site, including from the tops of the stockpiles within the main permitted section of the Site.

The water suppression system installed at points throughout the main haul road was observed in operation and appeared to be effective in managing dust lift-off. Bowser movements were also noted throughout the main permitted area, with the main roadways dampened down.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.