

Compliance Assessment Report CAR_NRW0044855

Permit being assessed: BP3635MR.

For: Port Talbot Steel Works , **held by:** Harsco Metals Group Ltd

At: Port Talbot Work , Port Talbot, PORT TALBOT, Neath Port Talbot, SA13 2NG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 31/07/2024 between 09:30 and 12:30.

Parts of permit assessed: General management of operations and operating procedures.

NRW Lead Officer: Kirsty Thomas, accompanied by Gary Evans, Benjamin Taylor.

Report sent to: Harsco Metals Group Limited, Environment, Health & Safety Manager , on 05/08/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
IR3G - Installations - Emissions and monitoring - Air quality management plans	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

NRW officers attended the Harsco site on the 31st July 2024. The main aim of the visit was to undertake an inspection of the plating pits area and a review of their procedures in regard to handling torpedoes and pit preparation. This inspection is required following a rise in plating emissions during the 2023 and early parts of 2024 with potential impacts to air quality.

The agenda for discussion for this site inspection was as follows:

- Introductions
- Process Overview (Slag Handling/Drop balling/Plating/Lancing/MR Plant)
- Review Harsco procedures linked to the AQMP (fugitive emissions)
- Plating Pit Procedures (Torpedo handing/Pit prep/Pouring process)
- On site overview (Inspection Plating Pits/Laundry boxes)

Overview

NRW officers arrived at Harsco's main office at 09:30am and were met by Harsco Metals Group Limited (Harsco) and Tata Steel UK (Tata) representatives. After initial introductions, Harsco provided NRW officers with a process overview of activities undertaken within the Harsco site boundary (Harsco is a ring-fenced site). Some of the main activities undertaken at site include slag handling, drop balling, iron plating pits/pools, lancing, Material Recovery Plant (MRP), burners yard, fragmentation plant, scarp handling, baler press. Hot slag pots (Kress slag pots) and desulph pots are loaded with molten material generated from other parts of the Tata Steel site. The pots transport the material and discharge to the relevant slag pits and desulph pits within the Harsco site boundary. Pots are left to stand for 24 hours.

Along with fixed plant on site, there are many heavy mobile plant machinery/vehicles operating on site.

Harsco explained that there are bespoke operating procedures in place for the various activities undertaken on site and that staff are appropriately trained.

As previously noted, the iron plating activities were a key focus for this site inspection. Plating is required when molten iron is transported via a torpedo from Tata blast furnaces. Molten iron from the furnaces can be sporadic. This can be because of over production of iron, poor quality, recovery of a furnace or torpedo etc. The molten iron is emptied into the plating pits/pools. Tata provide Harsco with at least 1 hours' notice of the need to send molten iron to the Harsco site for plating (this is deemed sufficient time for the preparation of the pits to be undertaken). A red/green light traffic system is implemented for the

torpedoes arriving to site via railway (process detailed in procedural documents).

Recent investigation reports for air quality breaches in particulate matter (PM10), identified that there was an increase in plating activities earlier in the year. Harsco have pro-actively reviewed their iron plating procedures and implemented several improvements as of March 2024. These improvements include:

- Lidding of launder boxes;
- Increased cleaning (including cleaning of the launder boxes and chutes);
- Use of fire blankets on tracks; and
- Use of loam (sand) around the launder boxes and chutes.

Details of these improvements have been included in the site's procedure document '*WI-PT-MRP-4119 Operation of the Excavator at the Iron Pools*'.

NRW requested to obtain copies of other key operating procedure documents, including the procedures linked to the Port Talbot Steel Works Air Quality Management Plan (AQMP) addressing how they deal with fugitive emissions. The following additional procedure documents were shared:

- *WI-PT-BOS-0036 Iron Pool Maintenance and Iron plating into Plating Pits*
- *WI-PT-GEN-1713 Port Talbot Air Quality Action Plan (2)*

The documents contain relevant procedural operating information including the shared roles between Harsco and Tata Steel UK.

Since the improvements made particularly at the plating pits and with the reduction of activities at Tata Steel, there has been a reduction in plating being required and therefore plating emissions. Since June 2024 Tata are operating one blast furnace which again will reduce potential plating operations due to the reduced volume of iron to the BOS Plant. Similarly, this will also support more redundancy within the torpedo fleet (9 in operation and 5 on standby). This along with updated procedures should reduce fugitive emissions from plating activities at the Steelworks.

The need for plating activities will cease following the closure of the remaining blast furnace at the heavy end of the Tata site (planned for September 2024). The need for retaining the plating pits/plating operations will need to be reviewed by the site in the near future.

Site inspection – Plating pits

Following the initial site/process overview discussions, NRW officers were taken on site to inspect the plating pits/laundry boxes.



Image 1 - Plating pits (pools 1-6)

Pools 1-2 of the plating pit share a single launder box. Pool 1-2 were empty at time of inspection. Pool 3 contained less than 1000 tonnes of molten iron recently added. Pools 4 and 5 were filled with molten iron that had since cooled. Once the molten iron is discharged into the pits, pools are left to cool. The cooled material will be emptied and sent for use in the BOS plant or sold elsewhere. Material will be sent to the balling pit first if further processing is required.

NRW officers observed the recently implemented improvement measures used at the plating pits including the launder box lids, fire blankets and use of loam/sand.



Image 2 - Launder box lids with loam



Image 3 – fire blanket



Image 4 - Pool 3 containing less than 1000 tonnes of molten iron



Image 5 - Pool 4

NRW officers were driven across the site to gain an overview of the many other activities undertaken. No detail inspection of these activities was undertaken at this time.

NRW are satisfied Harsco have been proactive in reviewing their procedures and implementing improvements to iron plating activities. Harsco also have a work instruction (*WI-PT-GEN-1713 Port Talbot Air Quality Action Plan (2)*) in place which is linked to the Port Talbot Air Quality Action Plan.

Additionally, a site wide AQMP is currently being revised and updated by Tata (V14).

Plating activities/emissions are expected to carry on reducing and ultimately cease when the heavy end of the Tata steel making facility undergoes decommissioning. This along with updated procedures should reduce fugitive emissions from plating activities at the Steelworks.

END

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.