

## Compliance Assessment Report for: CAR\_NRW0044617- Q124

<b>Permit number</b>	BL7108IM	<b>Operator name</b>	Tata Steel UK Ltd
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<b>Site name</b>	Port Talbot Steelworks
<b>Site address</b>	Port Talbot Steelworks, Port Talbot, SA13 2NG
<b>Type of assessment</b>	Report/Data Review

<b>Date of assessment</b>	26/04/2024	<b>Time in</b>		<b>Time out</b>	
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<b>Parts of permit assessed</b>	Q1 2024 Monitoring Returns
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<b>NRW Lead officer</b>	Rhodri Morgan	<b>Accompanied by</b>	
<b>Report sent to – Name and position</b>	Nathan Ace Head of Environment TSUK Operations	<b>Date</b>	27/06/2024

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR3A - Emission & Monitoring - Emissions to water, air or land	C3 Minor (8)	3.1.2
IR4B - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	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
8	32

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?

Compliance Criteria	Action needed	Complete by
IR3A - Emissions to water, air or land	Ensure emissions from the site are compliant with the emission limits listed within the permit.	Ongoing

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.

**You are non-compliant with your permit.**

**We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.**

### 4. Details of our assessment

#### **Introduction**

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

This is a review of the Quarter 1 (Q1) January - March 2024 monitoring submissions, which were submitted by TSUK between the 26<sup>th</sup> - 29<sup>th</sup> of April 2024.

#### **Scope**

The following reports have been part assessed within this Compliance Assessment Report (CAR):

- 2024 Q1 continuous emissions monitoring (air) - LCP.
- 2024 Q1 continuous emissions monitoring (air) – other.
- 2024 Q1 discontinuous emissions monitoring (air).
- 2024 Q1 emissions monitoring (water).
- Schedule 5: Notifications.

#### **Sinter Plant**

##### **A1 - Sinter Plant Main Stack**

Continuous emission monitoring system (CEMS) results for Particulate Matter (PM) have been submitted for Q1, with sixteen exceedances<sup>1</sup> of the 40 mg/m<sup>3</sup> daily emission limit noted.

Three Schedule 5 Part A notifications were submitted for the confirmed PM exceedances (S5N\_24\_06A, S5N\_24\_14A and S5N\_24\_24A) corresponding with breaches that occurred within three consecutive months. NRW has previously agreed to accept a monthly Schedule 5 notification from TSUK in the event of continued breaches of the PM daily mean ELV at A1<sup>2</sup>.

<sup>1</sup> Following the application of the uncertainty value  $\pm 30\%$  reported by the operator.

<sup>2</sup> TSUK are required to notify NRW within 24 hours of detection, breaches greater than twice the permitted ELV.

TSUK have developed and implemented an emissions reduction programme, which outlines the steps required to achieve compliance with the ELV for PM at emission point A1.

**The breaches of the PM emission limit are contrary to condition 3.1.2 of the permit. Non-compliance scores of C3 have been allocated to these breaches.**

- **In accordance with non-compliance scoring guidelines, the non-compliance scores attributed to the PM breaches over the Q1 monitoring period have been consolidated into one score.**

CEMS results for SO<sub>2</sub> and NO<sub>x</sub> have been submitted for the monitoring period with no exceedances of the 500 mg/m<sup>3</sup> daily mean emission limit reported<sup>3</sup>.

PAH, Dioxins, and Mercury spot extractive sampling is required on a six-monthly (or annually for Mercury) basis and as a result, has not been undertaken within the Q1 reporting period.

### **A2 – Sinter Plant De-Duster Stack**

CEMS results for PM have been submitted for the monitoring period with no exceedances of the 10 mg/m<sup>3</sup> daily mean emission limit reported.

### **Morfa Coke Ovens**

As a result of deteriorating operational stability and proposed new development at TSUK Port Talbot, the Morfa Coke Ovens are no longer operational as of Wednesday, 20<sup>th</sup> of March 2024.

### **A54 – Morfa Coke Oven Batteries**

Monthly monitoring results for Door Leakage (DLCF), Top Leakage (TLCF) and visible emissions have been submitted in line with the permit requirements.

No exceedances of the DLCF or TLCF emission limits have been reported.

### **Visible Emissions from charging**

Exceedances of the visible emissions monitoring limit (<30 seconds per charge) have been reported for each month, with the following monthly averages recorded:

- January 2024 – 62.8 seconds
- February 2024 – 26.8 seconds
- March 2024 – 38.9 seconds

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<sup>3</sup> Following the application of the uncertainty value ± 20% reported by the operator.

Schedule 5 notifications have been submitted for the two confirmed visible emissions exceedances (S5N\_24\_05A & S5N\_24\_23A).

**The breach of the visible emissions limit is contrary to condition 3.1.2 of the permit. Non-compliance scores of C3 have been allocated to these breaches.**

- **In accordance with non-compliance scoring guidelines, the non-compliance scores attributed to the visible emission breaches over the Q1 monitoring period have been consolidated into one score.**

#### **A55 – Morfa Main Stack**

Visible smoke emissions from the Morfa Main Stack are continuously measured using the Ringelmann scale with a limit of Ringelmann 1 (25% Obscuration) set in the permit.

Results for the monitoring period show the emission limit was not exceeded<sup>4</sup>.

No spot extractive sampling for SO<sub>2</sub> or NO<sub>x</sub> was undertaken due to the closure of the Morfa Coke Ovens.

#### **A56 – Minister Stein**

A Schedule 5 Part A notification (S5N\_24\_21A) has been submitted following a breach of the PM emission limit (20 mg/Nm<sup>3</sup> hourly mean). Spot extractive sampling undertaken on the 14<sup>th</sup> of March 2024 recorded a figure of 48.4 mg/Nm<sup>3</sup>.

**The breach of the PM emission limit is contrary to condition 3.1.2 of the permit. In accordance with non-compliance scoring guidelines a non-compliance score of C3 has been allocated.**

#### **A57 – Ammonia Incinerator**

Spot extractive sampling undertaken on the 26<sup>th</sup> of February 2024, indicate that the SO<sub>2</sub> (2000 mg/m<sup>3</sup>) and NO<sub>x</sub> (200 mg/m<sup>3</sup>) emission limits were not exceeded.

### **Ironmaking**

#### **A6 – BF4 Hot Blast Stove Stack**

Spot extractive sampling undertaken on the 6<sup>th</sup> of March indicate no exceedances of the SO<sub>2</sub>, NO<sub>x</sub> or PM emission limits.

#### **A8A – BF4 Casthouse Fume Extraction North**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

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<sup>4</sup> Following the application of the uncertainty value (30%) by the operator.

**A8B – BF4 Casthouse Fume Extraction South**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

**A65 – Ferrous Stock House Filter Plant Stack**

Spot extractive sampling is an annual requirement and was not reported during this monitoring period.

**A7 – BF5 Hot Blast Stove Stack**

Spot extractive sampling undertaken on the 7<sup>th</sup> of March 2024 indicate no exceedances of the SO<sub>2</sub>, NO<sub>x</sub> and PM emission limits for the monitoring period.

**A9 – BF5 Casthouse Fume Extraction**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

**A37 – Fluidised Bed Dryer 1**

PM spot extractive sampling was undertaken on the 9<sup>th</sup> of February and 13<sup>th</sup> of March 2024, both indicate no exceedances of the PM (20 mg/m<sup>3</sup> hourly mean) emission limit.

**A38 – Fluidised Bed Dryer 2**

Spot extractive sampling undertaken on the 13<sup>th</sup> February 2024, indicate that the PM (20 mg/m<sup>3</sup> hourly mean) emission limit was not exceeded.

**A39 – Number 1 New Mill Stack (GCI)**

Spot extractive sampling for SO<sub>2</sub>, NO<sub>x</sub> and PM is a six-monthly requirement and was not reported during this monitoring period.

**Basic Oxygen Steelmaking and Casting**

**A10 – Hot Metal Pouring Fume Extraction Plant Stack**

A Schedule 5 Part A notification (S5N\_24\_10A) has been submitted following a breach of the PM emission limit (15 mg/m<sup>3</sup>), which recorded on the 11th of February 2024 with a reported value of 16.22 mg/m<sup>3</sup>.

**The breach of the PM emission limit is contrary to condition 3.1.2 of the permit. In accordance with non-compliance scoring guidelines a non-compliance score of C3 has been allocated.**

**A10A – Hot Metal Fume Extraction Number 2**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded<sup>5</sup>.

**A11 – Lime Plant Dust Extraction Stack**

PM spot extractive sampling is an annual requirement and was not reported during this monitoring period.

**A14 – Secondary Fume Extraction Stack (North)**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

**A15 – Secondary Fume Extraction Stack (Centre)**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

**A16 – Secondary Fume Extraction Stack (South)**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

**A63 – CAS-OB / Desulph Fume Extraction Plant**

The continuous PM results for the monitoring period have been submitted with no exceedances of the 15 mg/m<sup>3</sup> daily mean emission limit recorded.

**A70 – Burning Booth**

PM spot extractive sampling is an annual requirement and was not reported during this monitoring period.

**Hot/ Cold Mills**

**A34A – Reheat Furnace Duct (North)**

Spot extractive sampling undertaken on the 23<sup>rd</sup> of February 2024 indicate no exceedances of the SO<sub>2</sub>, NO<sub>x</sub> or PM emission limits for the monitoring period.

**A34B – Reheat Furnace Duct (South)**

Spot extractive sampling undertaken on the 1<sup>st</sup> of February 2024 indicate no exceedances of the SO<sub>2</sub>, NO<sub>x</sub> or PM emission limits for the monitoring period.

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<sup>5</sup> Following the application of the uncertainty value ± 30% reported by the operator.

**A21 – Pickle Line Scrubber Fume Extraction**

The recorded Chlorides (as HCl) result (0.1 mg/m<sup>3</sup>) collected on the 15<sup>th</sup> of February 2024 was under the 5 mg/m<sup>3</sup> emission limit.

**Energy**

**A50 – Service Boilers 4 & 5 Stack**

CEMS results for PM and NO<sub>x</sub> have been submitted for the monitoring period, with no exceedances of the daily or monthly mean emission limits noted.

A Schedule 5 Part A notification (S5N/24/16A) was submitted by TSUK following breach of the variable SO<sub>2</sub> daily emission limit on the 4<sup>th</sup> of January 2024.

**The breach of the SO<sub>2</sub> emission limit is contrary to condition 3.1.2 of the permit. Non-compliance scores of C3 have been allocated to this breach.**

**A51 – Boiler 5 (Margam A)**

CEMS results for PM have been submitted for the monitoring period, with no exceedances of the daily or monthly mean emission limits noted.

Spot extractive sampling undertaken on the 23<sup>rd</sup> of January 2024 indicates compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission limits for the monitoring period.

**A52A Boiler 6 (Margam C)**

CEMS results for PM, NO<sub>x</sub> and SO<sub>2</sub> and have been submitted for the monitoring period, with no exceedances of the daily or monthly mean emission limits noted.

**A52B Boiler 7 (Margam C)**

CEMS results for PM, NO<sub>x</sub> and SO<sub>2</sub> have been submitted for the monitoring period, with no exceedances of the daily or monthly mean emission limits noted.

**A53 – Mitchell Boiler (Margam B)**

CEMS results for PM have been submitted for the monitoring period, with no exceedances of the monthly or daily mean emission limits noted.

Spot extractive sampling undertaken on the 23<sup>rd</sup> of January 2024 indicate compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission limits for the monitoring period.

**A62 – Boiler 3**

CEMS results for PM, NO<sub>x</sub> and SO<sub>2</sub> have been submitted for the monitoring period, with no exceedances of the daily or monthly mean emission limits noted.

Carbon monoxide (CO) monitoring was not required throughout the monitoring period as a mix of fuels were used within the boiler. The CO limit only applies when boiler is fired exclusively on Natural Gas.

**Effluent**

**W1 - Long Sea Outfall**

The maximum flow rate through the emission point for the quarter was 2,920m<sup>3</sup>/hour; under the emission limit of 6,000 m<sup>3</sup>/hour.

The monitoring submission indicates compliance with the emission limits at W1 except for the following:

Determinand	Monitoring Date (w/c)	Schedule 5 – Part A (TSUK Ref)	Schedule 5 – Part B (TSUK Ref)
Iron	31/12/2023	S5N_24_03A	S5N/23/59B
Iron	28/01/2024	S5N/24/07A	Not Submitted
Zinc	28/01/2024	S5N/24/08A	Not Submitted
Iron	04/02/2024	S5N_24_11A	Not Submitted
Cyanide	04/02/2024	S5N_24_12A	Not Submitted
Iron	25/02/2024	S5N/24/15A	S5N_24_15B
Cyanide	03/03/2024	S5N/24/19A	Not Submitted
Iron	10/03/2024	S5N_24_20A	S5N/24/26B
Zinc	24/03/2024	S5N/24/22A	Not Submitted

Table 1: Q1 – List of Long Sea Outfall Exceedances

**Iron**

The Iron emission limit of 5.0 mg/l was exceeded five times throughout the Q1 2024 monitoring period – weeks commencing:

- 31<sup>st</sup> of December 2023 (7.5mg/l)
- 28<sup>th</sup> of January 2024 (8.79mg/l)
- 4<sup>th</sup> of February 2024 (6.69mg/l)
- 25<sup>th</sup> of February 2024 (8.98mg/l)
- 10<sup>th</sup> of March 2024 (8.696mg/l)

**The breaches of the Iron emission limit are in contrary to condition 3.1.2 of the permit. Non-compliance scores of C3 have been allocated to these breaches.**

- **In accordance with non-compliance scoring guidelines, the non-compliance scores attributed to the Iron breaches over the Q1 2024 monitoring period have been consolidated into one score.**

#### Cyanide

The Cyanide emission limit of 0.1 mg/l was exceeded twice throughout the Q1 2024 monitoring period – weeks commencing:

- 4<sup>th</sup> of February 2024 (0.12mg/l).
- 3<sup>rd</sup> of March 2024 (0.136mg/l)

**The breach of the Cyanide emission limit is in contrary to condition 3.1.2 of the permit. A non-compliance score of C3 have been allocated to the breach.**

- **In accordance with non-compliance scoring guidelines, the non-compliance scores attributed to the Cyanide breaches over the Q1 2024 monitoring period have been consolidated into one score.**

#### Zinc

The Zinc emission limit of 2.0 mg/l was exceeded twice throughout the Q1 2024 monitoring period – weeks commencing:

- 28<sup>th</sup> of January 2024 (2.88mg/l).
- 3<sup>rd</sup> of March 2024 (2.63mg/l)

**The breach of the Zinc emission limit is in contrary to condition 3.1.2 of the permit. A non-compliance score of C3 have been allocated to the breach.**

- **In accordance with non-compliance scoring guidelines, the non-compliance scores attributed to the Zinc breaches over the Q1 2024 monitoring period have been consolidated into one score.**

#### **W2 - Arnallt Culvert Inlet**

There are no monitoring requirements associated with W2.

#### **W3 – Abbey Beach Outfall**

No exceedances in the suspended solid (200mg/l) or hydrocarbon (20mg/l) emission limits were reported within discharges at W3 throughout the monitoring period.

#### **W4 – Iron Ore Stockyard into Afan Estuary**

There are no specific emission limits listed against the emission point. The required monitoring was undertaken (monthly), with the relevant data submitted.

**W5 – Cooling Water discharge into Port Talbot Dock**

The maximum flow rate through the discharge point was 70,656 m<sup>3</sup>/day, which is under the emission limit of 350,000 m<sup>3</sup>/day.

No exceedances in the suspended solid (20mg/l) or temperature (36°C) emission limits were reported within discharges throughout the monitoring period.

**Note:** Not all potential breaches have been scored. If you have any queries about this report, please contact the NRW officers named above.

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 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

### 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 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto: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](mailto: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.