

Compliance Assessment Report for: CAR_ NRW0045038-SCSV

Permit number	BL7108IM	Operator name	Tata Steel UK Ltd
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Site name	Port Talbot Steelworks
Site address	Port Talbot Steelworks, Port Talbot, SA13 2NG
Type of assessment	Site Inspection

Date of assessment	04/07/2024	Time in	10:00	Time out	16:30
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Parts of permit assessed	See Section 4.
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NRW Lead officer	Kirsty Thomas	Accompanied by	Andi Kemp, Ben Taylor
Report sent to – Name and position	Head of Environment TSUK Operations, TSUK Port Talbot	Date	10/09/2024

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
(IR1A) General Management	(A) Assessed, and no evidence of non-compliance	
(IR3B) Emissions of substances not controlled by emission limits	(X) Action only	
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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?

Compliance Criteria	Action needed	Complete by
IR3B	TSUK to submit to NRW their plans regarding the decommissioning and subsequent demolition of	30/11/2024

Compliance Criteria	Action needed	Complete by
	redundant tanks. The plan should include an inventory of tanks to remain operational/standing at site post transition and include information regarding secondary containment measures in place for each tank. Improvements should be identified where needed.	
IR3B	Operator is to confirm with NRW that decommissioning works on the Oil Treatment Facility were undertaken, or outline proposed decommissioning plans regarding the vessels and associated secondary containment infrastructure.	30/11/2024

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.

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

4. Details of our assessment

Introduction

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

Four other companies/operators – Tarmac Trading Limited, Harsco Metals Group Limited and Runtech Limited – are contracted to undertake their own permitted activities at the steelworks on TSUK's behalf.

Attendees

- Senior Representatives – TATA Steel UK (TSUK)
- Joanne Carter - COMAH Intervention Manager, HSE
- Andi Kemp - Lead Specialist Industry Regulation (SC), NRW
- Kirsty Thomas - Lead Specialist Industry Regulation (SW), NRW

- Benjamin Taylor – Senior Industry Regulation Officer (SW), NRW

Scope

This was a pre-arranged visit to facilitate a Control of Major Accident Hazards (COMAH) secondary and tertiary containment inspection. The inspection was conducted by the Competent Authority (CA) consisting of the HSE COMAH Intervention Manager and Lead Specialists from NRW. The over-arching objective of the visit was to '*understand proposed risks that may arise as a result of the decarbonisation/Electric Arc Furnace (EAF) transition process*', there was particular focus on the following assets:

- Million Gallon Tank (MGT)
- Coke Oven By-Products (COBP) i.e. ammonia liquor and benzole vessels.
- Relevant mineral oil / fuel oil stores and chemical inventories.

Due to the shut-down of Blast Furnace 5, the inspection of the Phoenix Wharf Tank Farm was unable to be completed as proposed by CA/NRW due to safety concerns and resource shortage. TSUK informed NRW of the BF5 shutdown and potential access concerns prior to the visit.

Site Observations

The visit began with an introductory meeting, where representatives of TSUK presented information in response to a number of Requests for Information (RFIs) made by NRW. This CAR will not go into detail regarding the contents of this meeting as this will be covered by the COMAH CA Inspection Report, however an overview of topics is summarised below:

- Current Secondary Containment.
- Engineering Inspections.
- Future Inventory.
- Million Gallon Tank.
- MCO By-products.
- Drainage and Effluent Systems.
- Containment Loss Emergency Response.



Image 1: View of closed MCO Batteries

The Site walkover began in the vicinity of the Morfa Coking Ovens (MCO) which ceased operating on 20th of March 2024. During the walkover, the Benzole, Ammonia, and Naphthalene Tanks, Washer Tanks and COBP Tank Farm were inspected. NRW were informed by TSUK that the Benzole Storage Tanks were now redundant, with the last tanker-load having been removed from Site the week prior. There are no plans for Benzole storage post transition, and they are due for decommissioning.



Image 2: Benzole, Ammonia and Naphthalene Washer Tanks

TSUK informed NRW that they had made progress with the decommissioning of the Washer Tanks, with the Benzole and Naphthalene having been emptied and cleaned in preparation. However, both Ammonia Washer Tanks still contain water and further work is needed before decommissioning can commence.



Image 3: Tank Farm - Coal Tar (left), Ammonia Liquor (rear) and Effluent (right)

Inspection of the Tank Farm noted that only the Effluent Tank is currently benefitting from secondary containment. The two Coal Tar and Ammonia Liquor tanks have capacity of 1,000,000 litres each. TSUK had previously informed NRW of their plans to empty, clean and decommission the tanks during the transition process. Samples collected from the Ammonia Liquor Tanks will confirm the feasibility of processing the ammonia rich liquid through their onsite Biological Effluent Treatment (BET) Plant.



Image 4: Failed Water Inlet Pipe on BET Plant

The BET Plant was partially inspected by NRW Officers, a failure was noted on a water supply pipe which feeds into the plant. TSUK confirmed to NRW that the water would be uncontaminated, however efforts should be made to remediate the pipe to prevent further loss of water.



Image 5: Million Gallon Tank (MGT) - North (left) and South (right)

The MGT compound was inspected as the final part of the walkover. TSUK informed NRW that the South Tank (illustrated above) contains a mixture of oil, water and contaminated sludges, while the North Tank contains solely contaminated sludges. To reduce the risk of a catastrophic failure of South Tank during decommissioning, TSUK's proposes to process the contents of the South Tank prior to the dismantling of the North Tank. To do this, the roof will need to be removed to allow access to the sludge.



Image 6: Processed Oil Tank

While attending the MGT compound, the processed oil tank was also identified. This is positioned adjacent to the MGT facility discussed above. The vessel receives waste oils from the steelworks where the wastes are then subject to a simple recovery process. TSUK stated that this is an 80,000-litre capacity tank, and as part of their management procedure they do not exceed 40,000 litres at any given time. Furthermore, NRW were also informed that this tank will still be in operation following the transition, receiving oil from the Hot Rolling Mill (HRM) and Cold Rolling Mill (CRM). An MSS contractor was transferring oil at the time of the inspection, it was noted there was spillage containment measures deployed below the coupling points associated with the vacuum tanker. There were two additional vessels, which were housed within masonry brick built bunding sited adjacent to the processed oil tank. These were not inspected during the visit.

A previous NRW visit (CAR_NRW0038405), which was undertaken in April 2021 outlined that the secondary containment measures in place for the Oil Treatment Facility were not in-line with guidelines specified by CIRIA C736. NRW is not aware of any works that may have been undertaken to improve containment infrastructure. The previous CAR specified that the Oil Treatment Facility was planned to be decommissioned within two years from the point of visit.

Action: Operator is to confirm with NRW that decommissioning works on the Oil Treatment Facility were undertaken, or outline proposed decommissioning plans regarding the vessels and associated secondary containment infrastructure.

Several tanks inspected were not provided with appropriate containment, however due to the short remaining lifespan of the tanks, it has been deemed impractical to bring the tanks in line with CIRIA C736 and instead TSUK should prioritise their safe decommissioning and demolition. TSUK informed NRW that they have identified which tanks will remain post transition and have undertaken inspections to ascertain whether the assets are in line with CIRIA C736. Those that fail to meet the specified guidelines will be brought in-line through remedial action, which will be followed up by NRW.

Action: TSUK to submit to NRW their plans and projected timescales regarding the decommissioning and subsequent demolition of redundant tanks. The plan should include an inventory of tanks to remain at site post transition and include information regarding secondary containment measures in place for each tank. Improvements should be identified where needed.

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 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.