

Compliance Assessment Report CAR_NRW0046330

Permit being assessed: AP3292LT.

For: Morfa Tip Closed Landfill Site, **held by:** Tata Steel UK Limited

At: Port Talbot Works, Margam, Port Talbot, N P T, SA13 2NG.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 2024 Monitoring Returns.

NRW Lead Officer: Rhodri Morgan.

Report sent to: Nathan Ace, Head of Environment TSUK Operations , on 18/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W3A(1) - Waste - Emissions and monitoring - Emissions to water	Assessed (A)	
W3A(2) - Waste - Emissions and monitoring - Emissions to air	Assessed (A)	
W3A(3) - Waste - Emissions and monitoring - Emissions to land	Assessed (A)	
W3E - Waste - Emissions and monitoring - Monitoring	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	
W4C - Waste - Information - Notification	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

Tata Steel UK Limited (Tata) maintains the unlined Morfa Closed Landfill (MCL) under the provisions of an EPR Permit (AP3292LT). The larger waste management site at Port Talbot includes the Hazardous Landfill (MHL) and the Non-Hazardous Landfill (MNHL).

The landfill stopped accepting waste and entered the aftercare period in April 2014, following the completion of capping works at the site. Subsequent works include the installation of a surface water system aimed at protecting groundwater levels within the surrounding area.

Purpose of Compliance Assessment

The following monitoring returns and reports have been assessed within this Compliance Assessment Report (CAR):

1. Quarter 1 (Q1) January to March 2024 Monitoring Returns
2. Quarter 2 (Q2) April to June 2024 Monitoring Returns
3. Quarter 3 (Q3) July to September 2024 Monitoring Returns
4. Quarter 4 (Q4) October to December 2024 Monitoring Returns

Compliance Assessment

Groundwater Monitoring

The required groundwater monitoring; groundwater level and quality, was undertaken throughout 2024.

Four Schedule 5 Notifications were submitted throughout 2024 for potential exceedances of the trigger levels listed within the EPR Permit:

- S5N_24_19(49)A
- S5N_24_56A
- S5N_24_67A
- S5N_24_72A

On each occasion the Operator arranged for the potential exceedance to be resampled; no exceedances of the permitted trigger levels were recorded.

There were no reported exceedances of the groundwater trigger levels for either the deep or shallow monitoring wells.

Surface Water Monitoring

The required surface water monitoring; including levels and quality was undertaken, with the relevant data submitted.

Recharge Trench Monitoring

Water quality data from Recharge Trenches A, B and C was submitted with no breaches of the emission limits noted.

Landfill Gas

Landfill gas monitoring throughout 2024 encountered no exceedances of the methane limit of 1% v/v above background concentrations.

Note: This CAR report and assessment was undertaken on 18th February 2025. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31 December 2024.

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.