

Compliance Assessment Report CAR_NRW0046394

Permit being assessed: BL7108IM.

For: Port Talbot Steel Works , **held by:** Tata Steel UK Limited

At: Tata Steel Strip Products UK , PORT TALBOT, PORT
TALBOT, WEST GLAMORGAN, SA13 2NG.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Permit conditions 1.1.1, 3.1.2, 3.5.1, 4.2.2, 4.3.2.

NRW Lead Officer: Benjamin Taylor.

Report sent to: Head of Environment , TSUK Operations, on 20/02/2025.

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	C3 Minor	Permit condition 1.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR4C - Installations - 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
2	8

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?

Criteria	Action needed	Complete by
IR1A	TSUK is to submit documents to NRW detailing previous	31/03/2025

Criteria	Action needed	Complete by
	maintenance of the stirrers associated with the acid neutralising tank and flocculation tank of the Cold Mill Effluent Treatment Plant.	
IR3A(1)	As action above.	31/03/2025

Compliance 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 prosecution 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 Number BL7108IM. The Site is currently transitioning towards Electric Arc Furnace (EAF) Steelmaking, with aims to be fully operational by late 2027/early 2028. As a result, there was cessation of the Heavy End associated with the former integrated steelmaking process as of the 30th of September 2024. TSUK are in active discussions with NRW regarding the sites proposed transition and permit variation requirements.

This is a review of the Quarter 4 (Q4) October - December 2024 monitoring submissions, which were submitted by TSUK on the 20th of January 2025.

The results were submitted within the specified timeframe (28 day) and as a result, TSUK is **compliant** with permit condition 4.2.2.

Scope

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

- 2024 Q4 discontinuous emissions monitoring (air).
- 2024 Q4 emissions monitoring (water).
- Schedule 5: Notifications.

Quarter 4 2024 Monitoring Submission Review

Non-operational Assets

Following closure of all Heavy End assets on or prior to 21st of October 2024, there has been no air emissions monitoring undertaken on the following assets/emission points:

- **Sinter Plant**
 - A1 - Sinter Plant
 - A2 – Sinter Plant Deduster
 -
- **Morfa Coke Ovens**
 - A54 – Morfa Coke Oven Batteries.
 - A55 – Morfa Main Stack.
 - A56 – Minister Stein.
 - A57 – Ammonia Incinerator.
 - A60B – Quench Tower.
- **Ironmaking**
 - A6 – Blast Furnace 4 Hot Blast Stoves.
 - A8A – Blast Furnace 4 Casthouse Fume Extraction North.
 - A8B – BF4 Casthouse Fume Extraction South.
 - A65 – Ferrous Stock House Filter Plant Stack.
 - A7 – Blast Furnace 5 Hot Blast Stove Stack.
 - A9 – Blast Furnace 5 Casthouse Fume Extraction.
 - A37 – Fluidised Bed Dryer 1.
 - A38 – Fluidised Bed Dryer 2.
 - A39 – Number 1 New Mill Stack (GCI).
- **Basic Oxygen Steelmaking and Casting**
 - A10 – Hot Metal Pouring Fume Extraction Plant Stack.
 - A10A – Hot Metal Fume Extraction Number 2.
 - A11 – Lime Plant Dust Extraction Stack.
 - A14 – Secondary Fume Extraction Stack (North).
 - A15 – Secondary Fume Extraction Stack (Centre).
 - A16 – Secondary Fume Extraction Stack (South).
 - A63 – CAS-OB / Desulph Fume Extraction Plant.
 - A70 – Burning Booth.
- **Energy**
 - A50 – Service Boilers 4 & 5 Stack.
 - This asset was in operation until the 21st of October 2024.
 - A51 – Boiler 5 (Margam A).
 - A52A – Boiler 6 (Margam C).
 - A52B – Boiler 7 (Margam C).
 - A53 – Mitchell Boiler (Margam B).
 - A62 – Boiler 3.

It is the understanding on NRW that there is no intention to recommission any of the aforementioned assets and decommissioning plans are being prepared. It is important to highlight that changes to the activities on the Site and associated emissions points are required to be captured within a permit variation.

Operational Assets

Hot Mills

A34A – Reheat Furnace Duct (North)

Gaseous spot extractive sampling for A34A was undertaken between the 30th of October 2024, there were no recorded exceedances of the SO₂ or NO_x. Particulate spot extractive sampling is required on an annual basis, this was undertaken on the 29th of August 2024 with no exceedance was recorded.

A34B – Reheat Furnace Duct (South)

This asset has been reported as non-operational since the 26th of June 2024 and as a result monitoring has not been undertaken within the Q4 reporting period. The Operator has specified that this asset will be returned to operation in the future, however there is no indication of a timeframe. It is expected that monitoring will be undertaken on the asset once it has been recommissioned.

Cold Mills

A21 – Pickle Line Scrubber Fume Extraction

The recorded Chlorides (as HCl) result (0.3 mg/m³) collected on the 15th of October 2024 was below the 5 mg/m³ emission limit.

Effluent

W1 - Long Sea Outfall

The maximum flow rate through the emission point for the quarter was 2,209m³/hour; below the emission limit of 6,000 m³/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	01/12/2024	S5N_24_71A	S5N_24_71B

Table 1: Q4 – List of Long Sea Outfall Exceedances

Iron

The Iron emission limit of 5.0 mg/l was exceeded once throughout the Q4 2024 monitoring period on the following week commencing:

- 1st of December 2024 (6.65mg/l)

The above exceedance has been attributed to the failure of the gearbox/motor associated with the stirrer within the acid neutralising tank, which forms part of the Cold Mill Effluent Treatment Plant. TSUK also informed NRW that the flocculation tank stirrer was also out of operation due to a failed motor. Furthermore, damage (caused by high winds) to the control panel associated with the sludge

tank prevented operators from being able to monitor levels and pH. Ultimately, this led to a spike of iron recorded at W1 (26.3mg/l) which was significantly above the 5mg/l limit weekly average limit. The failed components of these assets were rectified promptly and the following week was within compliance.

Compliance:

TSUK has failed to maintain equipment associated with the Cold Mill Effluent Treatment Plant which ultimately resulted in an exceedance of permitted levels for Iron at W1. This is considered a breach of permit conditions 3.1.2 and also 1.1.1. As a result of this, a non-compliance score of C3 has been allocated against compliance sub-criteria's IR3A(1) – Emissions to Water and IR1A – General Management.

Action:

TSUK is to submit documents to NRW detailing previous maintenance of the stirrers associated with the acid neutralising tank and flocculation tank of the Cold Mill Effluent Treatment Plant.

W2 - Arnallt Culvert Inlet

There are no monitoring requirements associated with W2.

W3 – Abbey Beach Outfall

There were no reported exceedances of permitted ELVs associated with W3 throughout the entirety of Q4 2024.

W4 – Iron Ore Stockyard into Afan Estuary

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

W5 – Cooling Water discharge into Port Talbot Dock

The Operator has stated that the flow at W5 ceased operation on the 29th of September 2024 as part of the Sites's transition to an EAF.

Please note: This CAR report and assessment was undertaken on 7th of February 2025. However to ensure that the non-compliance score is attributed to the correct financial year (for billing) the date on CARS system has been altered to 31st of 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 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.