

Compliance Assessment Report CAR_NRW0046509

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|----------------------|----------|----------------------|-----------------------|
| Permit number | BS3905IP | Operator name | Tata Steel UK Limited |
|----------------------|----------|----------------------|-----------------------|

| | |
|------------------------|---|
| Site name | Tata Steel UK Limited |
| Site address | TATA Steel Strip Products UK, Llanwern Works, Newport, NP19 4QZ |
| Assessment type | Report/Data Review |

| | | | | | |
|---------------------------|------------------|----------------|-----|-----------------|-----|
| Date of assessment | 26 February 2025 | Time in | N/A | Time out | N/A |
|---------------------------|------------------|----------------|-----|-----------------|-----|

| | |
|---------------------------------|---------------------------------------|
| Parts of permit assessed | Monitoring and reporting requirements |
|---------------------------------|---------------------------------------|

| | | | |
|---|--|-----------------------|------------------|
| NRW Lead officer | Guy Baskerville | Accompanied by | N/A |
| Report sent to – Name and position | [REDACTED] Fire & Environment Manager | Date | 28 February 2025 |

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

| Part of permitted activity assessed 1B(use action criteria below) | Assessment result | Permit condition |
|--|----------------------------------|---------------------------------------|
| IR4B - Information - Reporting | Assessed or assessed in part (A) | 4.1.2 4.1.4 4.1.5 4.1.7 9 |

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 |

2. What action is required?

| Criteria | Action needed | Complete by |
|----------|---------------|-------------|
| N/A | N/A | N/A |

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.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter 'NRW') assessment against Tata Steel UK Limited's (hereafter 'Tata Steel') **Q1, Q2, Q3 & Q4 [2024], 6-monthly [January – June 2024 & July - December 2024] and annual [2024]** monitoring and reporting requirements. NRW's assessment of Tata Steel's monitoring returns data is outside the scope of this CAR and any non-compliance arising from an exceedance of a permitted emission limit will be recorded in a separate CAR.

Condition 4.1.2 of the environmental permit states:

The Operator shall report the parameters listed in Table S2 to Schedule 2 as follows:

- (a) in respect of the emission points specified;*
- (b) for the reporting periods specified in Table S2 to Schedule 2 and using the forms specified in table S3 to Schedule 3;*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables; and*
- (d) sending the reports to the Agency [sic] within 28 days of the end of the reporting period.*

Table S2 of Schedule 2 to the environmental permit is partially reproduced below.

| Table S2: Reporting of monitoring data | | | |
|--|-------------------------|-------------------------|----------------------|
| Parameter | Emission point | Reporting period | Period begins |
| Oxides of nitrogen (as NO ₂) mg/m ³ | A1, A2, A3, A4, A5, A11 | Every 3 months | 01/01/10 |
| Carbon monoxide mg/m ³ | A1, A2, A3, A4, A5, A11 | Every 3 months | 01/01/10 |
| Hydrogen chloride mg/m ³ | A6, A7 | Every 3 months | 01/01/04 |
| Metals ¹ | W1 | Every 3 months | 01/01/04 |
| pH | W1 | Every 3 months | 01/01/04 |
| Suspended solids mg/l | W1 | Every 3 months | 01/01/04 |
| Total hydrocarbon oil mg/l | W1 | Every 3 months | 01/01/04 |
| Maximum flow m ³ /day | W1 | Every 3 months | 01/01/04 |
| Ammoniacal nitrogen | W1 | Every 3 months | 01/01/04 |
| Gas oil sulphur content %w/w | | Every 3 months | 01/01/04 |
| Particulate mg/m ³ | A14, A15, A16 | Every 6 months | 01/01/10 |
| Oxides of nitrogen (as NO ₂) mg/m ³ | A14, A15, A16 | Every 6 months | 01/01/10 |
| Carbon monoxide mg/m ³ | A14, A15, A16 | Every 6 months | 01/01/10 |
| Particulate mg/m ³ | A10, A12, A13, A17 | Every 12 months | 01/01/04 |
| Hydrogen chloride mg/m ³ | A8 | Every 12 months | 01/01/04 |
| Oil mist mg/m ³ | A9 | Every 12 months | 01/01/04 |
| Energy | | Every 12 months | 01/01/04 |
| Total annual oxides of nitrogen (T) | A14, A15, A16 | Annually | 01/01/10 |

| | | | |
|--|---------------|----------|----------|
| Total annual oxides of sulphur (T) (expressed as SO ₂) | A14, A15, A16 | Annually | 01/01/10 |
| Total annual dust emission (T) (expressed as total suspended particulates) | A14, A15, A16 | Annually | 01/01/10 |

¹ Metals means elements and compounds expressed as the metal and includes Cd, Cr, Cu, Hg, Pb, Zn, Fe

Table S3 of Schedule 3 to the environmental permit is partially reproduced below.

| Table S3: Reporting forms | | |
|----------------------------------|--------------------|---------------------|
| Media/parameter | Form Number | Date of form |
| Air | A1/2/3/4 | 01/09/09 |
| Water | W1 | 01/09/09 |
| Energy | EW1 | 01/09/09 |
| Performance Indicators | PI1 | 01/09/09 |

The monitoring report(s) submitted include reporting of monitoring carried out in respect of the emission points specified which represents compliance with the environmental permit.

The monitoring report(s) submitted are for the reporting periods specified in schedule 2 table S2 which represents compliance with the environmental permit.

The monitoring report(s) have been submitted using the forms specified in schedule 3 table S3 which represents compliance with the environmental permit.

The monitoring report(s) submitted include results and assessments as required by the forms specified in schedule 3 table S3 which represents compliance with the environmental permit.

The Q1 [January-March 2024] monitoring report(s) was submitted via email on 18 April 2024.

The Q2 [April-June 2024] and 6-monthly [January-June 2024] monitoring report(s) was submitted via email on 15 July 2024.

The Q3 [July-September 2024] monitoring report(s) was submitted via email on 08 October 2024.

The Q4 [October-December 2024], 6-monthly [July-December 2024] and annual [2024] monitoring report(s) was submitted via email on 23 January 2025. .

The monitoring report(s) submission was made inside the reporting window(s) which represents compliance with the environmental permit.

Condition 4.1.4 of the environmental permit states:

Where the Operator has a formal environment management system applying to the Permitted Installation which encompasses annual improvement targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous full calendar year's progress against such targets.

Annual improvement target summary report(s) was submitted via email on 31 January 2025.

The submission was made inside the reporting window which represents compliance with the environmental permit.

Condition 4.1.5 of the environmental permit states:

Fugitive emissions shall be reviewed on an annual basis and a summary report on this review shall be sent to the Agency [sic] detailing such releases and the measures taken to reduce them.

Annual fugitive emission summary report(s) was submitted via email on 31 January 2025 which represents compliance with the environmental permit.

Condition 4.1.7 of the environmental permit states:

The Operator shall submit an annual report to include key performance indicator for the principal departments within the installation, which as a minimum shall include the following measures of performance.

| | | | | |
|-----------|--|-----------------------------|--|---|
| Hot Mill | Total water supplied per tonne of rolled steel | Oil used per tonne of steel | Substance released into air per tonne of steel rolled: CO ₂ and NO _x (as NO ₂) | Waste Disposal per tonne of steel rolled (excluding material sent for recovery) |
| Cold Mill | | | | |
| Zodiac | | | Substance released into air per tonne of steel rolled: CO ₂ and NO _x (as NO ₂) | |

Annual performance indicator report(s) was submitted via email on 31 January 2025 which represents compliance with the environmental permit.

Condition 9 of the environmental permit states:

The Operator shall complete the requirements specified in Table 9.1.1 by the date specified in that table and shall send written notification of the date of completion of each requirement to the Agency [sic], at the Reporting Address, within 14 days of the completion of each requirement.

Table 9.1.1 of the environmental permit is partially reproduced below.

| Table 9.1.1: Improvement programme requirements | | |
|---|---|---|
| Reference | Requirement | Date |
| 9.5 | The Operator shall undertake an annual noise survey to determine background noise levels during plant shutdown and ambient noise levels during normal operation. Measurements shall be undertaken to the north of the site boundary at specific locations agreed with the Agency [sic]. A report that details any necessary requirements and actions to meet the Sector Guidance Note standards shall be submitted to the Agency [sic] | 01 October 2004 <u>and annually thereafter</u> |
| 9.7 | The Operator shall conduct a waste minimisation audit that analyses the use of raw materials, assess the opportunities for reductions in generated wastes and provides an action plan for achieving the identified improvements. The review shall assess the current disposal techniques to ensure that the disposal of wastes meets the requirements of the Landfill Directive. A report shall be provided to the Agency [sic]. The timescale for implementation of proposed action plans shall be agreed with the Agency [sic]. | 01 January 2005 <u>and annual updates on the anniversary</u> |

The annual noise survey was submitted via email on 31 January 2025 which represents compliance with the environmental permit.

The annual waste minimisation audit was submitted via email on 31 January 2025 which represents compliance with the environmental permit.

[END]

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):

| 9B Assessment result | 10B 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 |

| 11B Non-compliance category | 12B 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.