

Compliance Assessment Report CAR_NRW0043521

Permit number	BX9471IU	Operator name	Tata Steel UK Limited
----------------------	----------	----------------------	-----------------------

Site name	Trostre Works
Site address	Trostre, Llanelli, Carmarthenshire, SA14 9SD
Type of assessment	Report Review

Date of assessment	31/12/2023	Time in	N/A	Time out	N/A
---------------------------	------------	----------------	-----	-----------------	-----

Parts of permit assessed	Q4 2023 monitoring returns and annual submissions
---------------------------------	---

NRW Lead officer	Kirsty Thomas	Accompanied by	N/A
Report sent to – Name and position	Cara Cheetham, Energy and Environment	Date	20/02/2024

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	Assessed or assessed in part (A)	
IR4B - Information - Reporting	Assessed or assessed in part, no evidence of non-compliance found. Action Only (X)	4.2.3

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded
0

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR4B	Ensure submission of monitoring results in respect of parameters and emission points specified in Schedule 4 Table S4.1 are submitted to NRW within 28 days of the end of the reporting period (Condition 4.2.3).	28/03/2024

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.

No non-compliances were recorded during this assessment.

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

4. Details of our assessment

This CAR form has been issued in response to the submission of the Q4 (October - December) 2023 monitoring returns by the operator (Tata Steel UK Limited) and annual submissions for activities at Trostre Works, under permit number EPR-BX9471IU.

Q4 2023 Monitoring returns

Q4 2023 monitoring returns submitted as required by Condition 4.2.3. which detailed measurements taken in relation to the following permit requirements:

- Schedule 3, Table S3.1 – Point Source Emissions to Air
- Schedule 3, Table S3.2 – Point Source Emissions to Water (Other than Sewer) and Land

Reporting forms referenced A1 Air and W1 Water, which capture the quarterly data were submitted.

Air emissions

Quarter 4/Annual – Air (A2 Tin Anode Plate, A6, A24, A25, A26, A27)

- A1 Tin Anode Plate is mothballed and therefore no results submitted.
- Based on the results provided, the emissions from A2 Tin Anode Plate, A6, A24, A25, A26, A27 emission points were compliant with the permit's specified emission limits in 2023.

Water emissions

Quarter 4/Annual – Surface water emissions (W1 and W2)

- Based on the results submitted, the emissions from W1 and W2 emission points were compliant with the permit's specified limits.
- The Operator has also submitted the annual mass release of mercury and cadmium from the W1 emission point. The results indicate that emissions were below the specified emissions limits.

Action: Ensure submission of monitoring results in respect of parameters and emission points specified in Schedule 4 Table S4.1 are submitted to NRW within 28 days of the end of the reporting period (Condition 4.2.3).

2023 Annual submissions

The operator is required to submit annual submission on the performance of the activities over the previous year by 31 January. The operator submitted their annual report on the 31st January 2024; within the specified reporting window as per condition 4.2.2.

Annual Production - Reporting form Performance 1

The annual submission contained all the required information in accordance with permit condition 4.2.2(b).

Water usage – Reporting form WaterUsage 1

The annual submission contained all the required information in accordance with permit condition 4.2.2(c).

Waste – Reporting form R1

The annual submission contained all the required information in accordance with permit condition 4.2.2(c).

Energy Usage – Reporting form Energy1

The annual submission contained all the required information in accordance with permit condition 4.2.2(c).

Energy consumption (Boiler House – gas, electricity and oil) - Reporting form Performance 1

The annual submission contained all the required information in accordance with permit condition 4.2.2(c).

Note: This CAR report and assessment was undertaken on the 20.02.2024. However, to ensure that any non-compliance scores are attributed to the correct financial year (for billing) the date on the CARS system has been altered to 31st December 2023.

END

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.