

Compliance Assessment Report CAR_NRW0043071

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

Site name	Trostre Works EPR/BX9471IU,
Site address	Trostre Works, Llanelli, Carmarthenshire, SA14 9SD.
Type of assessment	Data review

Date of assessment	08/01/2024	Time in	N/a	Time out	N/a
---------------------------	------------	----------------	-----	-----------------	-----

Parts of permit assessed	Q1 – Q3 2023: Monitoring Submissions
---------------------------------	--------------------------------------

NRW Lead officer	Kirsty Thomas	Accompanied by	N/a
Report sent to – Name and position	Cara Cheetham, Energy and Environment.	Date	08/01/2024

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 (A)	

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?

No action is 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 prosecutions and/or suspension or revocation of your permit.

No non-compliances were recorded during this assessment.

4. Details of our assessment

This Compliance Assessment Report (CAR) is an assessment of the monitoring results from Quarter 1 (Q1) to Quarter 3 (Q3) of 2023 by TATA Steel UK Ltd (the Operator).

Q1 2023 (January – March) Monitoring Returns

Monitoring data for Q1 was submitted by the Operator on the 28th of April 2023, 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 both sent within the reporting period (28 days), which is **compliant** with permit condition 4.2.3.

Q1 - Point Source Emissions to Air

Table S3.1, Schedule 3 of the permit which outlines the emissions which are relevant to the Q1 monitoring submission is partially reproduced below.

Table S3.1 Point source emissions to air

Emission Point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A6 (located as shown on site layout and drainage plan referenced T1668)	Furnace stack, Continuous Annealing Product Line	Oxides of Nitrogen (as NO ₂)	350 mg/m ³	Hourly average	Quarterly	ISO 10849

Table 1: Extract of Table S3.1

Monitoring results supplied by the operator were below the set Emission Limit Value (ELV), and as a result are **compliant** with permit condition 3.1.2.

Q1 - Point Source Emissions to Water (Other than Sewer) and Land

Table S3.2, Schedule 3 of the permit which outlines the emissions which are relevant to the Q1 monitoring submission is partially reproduced below.

Table S3.2 Point source emissions to water (other than sewer) and land						
Emission Point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
W1 - receiving water is Lougher Estuary at NGR SS5237 9827.	Process effluent discharge from effluent treatment plant.	Flow	190 litres/second	Daily average	Continuous	As stated in response to IC11
		Temperature	35°C	-	Continuous	As agreed by NRW
		pH	5.0 to 10.0	-	Continuous	BS6068.50:1995 ISO 10523:1884
		Suspended Solids	60 mg/l	-	Daily composite sample	BS EN 872: 1996 BS6068-2.54:1996
		Oil and grease	12 mg/l	-	Daily composite sample	SCA Blue book 77 ISBN 0117517283
		Dissolved iron	40 mg/l	-	Daily composite sample	BS ISO 17294-2 :2003 BS6068-2.89:2003
		Total chromium	0.4 mg/l	-	Daily composite sample	BS ISO 17294-2 :2003 BS6068-2.89:2003
		Mercury	0.005 mg/l	-	Monthly	Mass balance calculation
		Cadmium	0.01 mg/l	-	Monthly	Mass balance calculation
		Chemical Oxygen Demand (COD) 2 hrs	300 mg/l	-	Daily spot sample	SCA Blue book 97 ISBN 0117519154
W2 - receiving water is Lougher Estuary at NGR SS5266 9905.	Uncontaminated surface water, East storm water drain.	pH	5.0 to 10.0	-	Continuous	

Table 2: Extract of Table S3.2

Monitoring results supplied by the operator were all below the set Emission Limit Values (ELV), and as a result are **compliant** with permit condition 3.1.2.

Q2 2023 (April – June) Monitoring Returns

Monitoring data for Q2 was submitted by the Operator on the 19th of July 2023, 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 both sent within the reporting period (28 days), which is compliant with permit condition 4.2.3.

Q2 - Point Source Emissions to Air

Monitoring results supplied by the operator were below the set Emission Limit Value (ELV), and as a result are **compliant** with permit condition 3.1.2.

Q2 - Point Source Emissions to Water (Other than Sewer) and Land

Monitoring results supplied by the operator were all below the set Emission Limit Values (ELV), and as a result are **compliant** with permit condition 3.1.2.

Q3 2023 (July – September) Monitoring Returns

Monitoring data for Q3 was submitted by the Operator on the 13th of October 2023, 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 both sent within the reporting period (28 days), which is compliant with permit condition 4.2.3.

Q3 - Point Source Emissions to Air

Monitoring results supplied by the operator were below the set Emission Limit Value (ELV), and as a result are **compliant** with permit condition 3.1.2.

Q3 - Point Source Emissions to Water (Other than Sewer) and Land

Monitoring results supplied by the operator were all below the set Emission Limit Values (ELV), and as a result are **compliant** with permit condition 3.1.2.

Compliance Comments

- No breaches of permit condition 3.1.2 noted.

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.