

Compliance Assessment Report CAR_NRW0049233

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: 21/07/2025.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor.

Report sent to: Head of Environment , Tata Steel (UK) Ltd, on 28/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	Permit condition 3.1.2.
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit condition 3.5.1a.
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR3E	TSUK is to undertake PM spot extractive sampling on A34B by the end of the next reporting period (unless otherwise agreed with NRW).	28/10/2025
IR3A(1)	TSUK is to review cleaning procedures associated with the Pickling Line to that sufficient control measures are in place to prevent recurrence of this exceedance in the future.	Already completed
IR1A	As IR3A(1) above.	Already completed
IR3E	TSUK is to proceed with the implementation of the MCERTs certified Magflow monitor (fitted with iFIX alarm) as soon as possible. In the interim, TSUK is to review their maintenance procedures regarding flow monitoring (which must include the proposed Magflow monitor) associated with the LSO outfall to prevent recurrence of future data losses.	28/10/2025
IR1A	As IR3E action above.	28/10/2025

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 EPR/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 of this transition, a number of assets have been or are in the process of being decommissioned, these have been listed within the previous CAR_NRW0046394 and subsequently will not be included within this document.

This is a review of the Quarter 2 (Q2) 2025: April to June Monitoring Submissions which were submitted by TSUK between the 15th and 21st of July 2025; this is noted as being within the specified timeframe by permit condition 4.2.2.

Scope

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

- 2025 Q2 discontinuous emissions monitoring (air).

- 2025 Q2 emissions monitoring (effluent).
- Schedule 5: Notifications.

Quarter 2 2025 Monitoring Submission Review

Air Emissions

Hot Mills

A34A – Reheat Furnace Duct (North)

Spot extractive sampling for A34A was not undertaken during the Q2 2025 reporting period as the asset was non-operational for this period. The previous sampling date is recorded as the 29th of August 2024 for PM and 30th of October 2024 for gaseous parameters

A34B – Reheat Furnace Duct (South)

PM spot extractive sampling is an annual requirement and was previously undertaken on the 28th of November 2023. It is noted that there was no spot extractive sampling for PM reported as being undertaken within the 2024 calendar year. NRW acknowledges that Reheat Furnace B which releases to atmosphere via A34B was taken out of operation on the 26th of June 2024 until recommissioning in Q1 2025.

Action:

TSUK is to undertake PM spot extractive sampling on A34B by the end of the next reporting period (unless otherwise agreed with NRW).

Gaseous spot extractive sampling for A34B was undertaken between the 19th and 21st of May 2025. The returned results were noted as being within compliance of the emission limits specified within Schedule 3: Table S3.5.

Energy

Package Boiler 1

Monitoring on Package Boiler 1 was not undertaken within the Q2 2025 reporting period.

TSUK have proposed to monitor the remaining Package Boilers on an annually frequency which is in line with requirements stipulated by *Annex III Part 1: 1* of the *Medium Combustion Plant Directive* (MCPD). The asset was previously sampled on the 28th of January 2025.

Package Boiler 2

Package Boiler 2 was decommissioned on the 2nd of May 2025. This asset will not be included within future CAR forms.

Package Boiler 3

Monitoring on Package Boiler 3 was not undertaken within the Q2 2025 reporting period.

TSUK have proposed to monitor the remaining Package Boilers on an annually frequency which is

in line with requirements stipulated by *Annex III Part 1: 1* of the *Medium Combustion Plant Directive* (MCPD). The asset was previously sampled on the 28th of January 2025.

Package Boiler 4

Package Boiler 4 was decommissioned on the 6th of February 2025. This asset will not be included within future CAR forms.

Cold Mills

A21 – Pickle Line Scrubber Fume Extraction

The recorded Chlorides (as HCl) result which was collected on the 8th of April 2025 was below the 5mg/m³ spot (hourly) emission limit.

Effluent

W1 - Long Sea Outfall

The maximum volume of discharge through W1 for the quarter was 1,439m³/hour; which is below the specified limit of 6,000 m³/hour.

TSUK submitted Schedule 5 Notifications for two exceedances of ELVs associated with emission point W1 as listed within *Schedule 3: Table S3.8*.

Iron

The iron emission limit of 5.0 mg/l was exceeded twice throughout the Q2 2025 monitoring period on the weeks commencing:

- 18th of May 2025 (5.58mg/l) - S5N_25_03A.
- 1st of June 2025 (6.46mg/l) - S5N_25_04A.

TSUK conducted investigations into the exceedances illustrated above, the outcomes of which were included within Schedule 5: Notifications Part Bs and were submitted to NRW.

- S5N_25_03B – submitted on the 28th of July 2025.
- S5N_25_04B – submitted on the 28th of July 2025.

18th of May 2025 - S5N_25_03A

TSUK have attributed this iron exceedance to the washing out of iron-oxide rich residues from the Wringer Box associated with the Pickling Line. TSUK reported that this cleaning activity increased the volume of effluent passing through the base neutralisation tank; minimising the retention time of the effluent within the asset. This resulted in a lower pH effluent exiting the asset allowing the iron to be soluble within the flow and ultimately discharged via W1. The root cause of this incident is considered to be insufficient procedures/control measures in place for asset cleaning activities, in this instance the Wringer Box associated with the Pickling Line.

1st of June 2025 - S5N_25_04A

This has been attributed to a low pH (pH 1.8 reported) effluent passing through the Cold Rolling ETP, this allowed the iron to remain soluble within the discharge. TSUK have been unable to determine a root cause of this exceedance. NRW were informed during the visit on the 22nd of August 2025 that

there has been a progressive decrease in pH levels observed over time in the flows entering the Cold Rolling ETP.

In response to the failures illustrated above, TSUK have implemented a diversion protocol during cleaning activities that will utilise the SPL Tank and Sludge Tank to ensure there is an increased retention time to neutralise the pH. NRW were also informed during a meeting on the 22nd of August 2025 that the pH setpoint for the neutralisation tank has also been increased from pH6.5 to pH7.5 in order to increase the systems overall pH level which will promote iron removal processes. TSUK have outlined that future instances of Wring Box cleaning will involve the iron oxide residues to be dug out as opposed to washed out into the effluent line. It is the understanding of NRW that these corrective measures/procedures have been agreed with Hargreaves

Compliance:

TSUK has failed to adhere to the iron emission limit of 5mg/l as specified within *Schedule 3: Table S3.8* for W1. This is a contravention of condition 3.1.2 of the permit. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR3A – Emissions to Water.

- In accordance with NRW's non-compliance scoring guidelines, the non-compliance scores attributed to the iron breaches over the Q2 2025 monitoring period have been consolidated into one score.

In addition, for the exceedance on the 18th of May 2025, NRW also considers there to be a failure to enact sufficient control measures to prevent pollution, this is considered indicative of inadequate management procedures for the activity. As a result, NRW considers this to be an additional contravention of permit condition 1.1.1. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR1A – General Management.

Action:

TSUK is to review cleaning procedures associated with the Pickling Line to that sufficient control measures are in place to prevent recurrence of this exceedance in the future (already completed, see S5N_25_03B).

All other reported parameters for W1 were noted as within the limits specified by *Schedule 3: Table S3.8*.

W2 - Arnallt Culvert Inlet

There are no monitoring requirements associated with W2.

W3 – Abbey Beach Outfall

There were no reported exceedances of permitted ELVs for parameters associated with W3 throughout the Q2 2025 reporting period.

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.

Monitoring

CEMS Outages

W1

TSUK submitted two Schedule 5 Notifications regarding losses of flow data for their CEMs associated with the W1 (LSO) emission point. Within these submissions, TSUK reported that flow data was lost for the following periods:

- 15:00 on 10th of June 2025 to 19:00 on 16th of June 2025 - S5N_25_05a.
- 07:00 on 22nd of July 2025 to 11:00 on 23rd of July 2025 - S5N_25_06a.

TSUK conducted investigations into the CEMS outages above, the outcomes of which were included within Schedule 5: Notifications Part Bs and were submitted to NRW.

- S5N_25_05B – submitted on the 28th of July 2025.
- S5N_25_06B – submitted on the 28th of July 2025.

The June data loss has been attributed to a sitewide power issue which caused the monitoring asset to power down. Due to the asset indicating a flow of 1,027m³/hr whilst powered down, the issue was not identified by relevant department within TSUK for a number of days.

To prevent a recurrence of detection delays, the Environment Team now track the flow reading for their daily meeting. Furthermore, TSUK have also proposed to install a MCERT certified Magflow monitor which will be fitted with an iFIX alarm. It is the understanding of NRW that the tender process for this has concluded, with aims to be implemented within the coming months. TSUK have outlined that the current 'clamp on flow monitor' will continue to operate in conjunction with the proposed Magflow monitor which will offer a contingency measure to mitigate future data losses/outages.

The July data loss (S5N_25_06a) has been attributed to a lack of lubrication on the measurement pads, this issue was identified and rectified more efficiently following incorporation of the daily flow data tracking.

TSUK confirmed flow data was restored within a day of the July CEMS outage due to the incorporation of tracking within daily meetings.

TSUK have outlined that estimated average flow rates surrounding both data losses were well below the permitted level (6000m³/hr), furthermore dry weather would indicate that this limit was not exceeded.

Compliance:

TSUK has failed to undertake the required monitoring as specified within *Schedule 3: Table S3.8* for flow rate at W1. This is a contravention of condition 3.5.1a of the permit. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR3E – Monitoring.

- In accordance with NRW's non-compliance scoring guidelines, the non-compliance scores attributed to monitoring failures at W1 over the Q2 2025 monitoring period have been consolidated into one score.

In addition, for the CEMS outage on 22nd/23rd of July 2025, it is considered that this outage is indicative of insufficient maintenance on the monitoring asset i.e. lack lubrication of the measurements pads which ultimately resulted in the data loss. NRW considers this be an additional contravention of permit condition 1.1.1. Consequently, a non-compliance score of C3 has also been attributed against compliance criteria IR1A – General Management.

Action:

TSUK is to proceed with the implementation of the MCERTs certified Magflow monitor (fitted with iFIX alarm) as soon as possible. In the interim, TSUK is to review their maintenance procedures regarding flow monitoring (which must include the proposed Magflow monitor) associated with the LSO outfall to prevent recurrence of future data losses.

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.