

Compliance Assessment Report for: CAR_NRW0049869

Permit number	BL7108IM	Operator name	Tata Steel UK Ltd
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Site name	Port Talbot Steelworks
Site address	Port Talbot Steelworks, Port Talbot, SA13 2NG
Type of assessment	Site Inspection

Date of assessment	17/10/2025	Time in	10:00	Time out	13:30
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Parts of permit assessed	See Section 4.
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NRW Lead officer	Benjamin Taylor	Accompanied by	Kirsty Thomas, Rhodri Morgan, Neil Herbert and Andi Kemp.
Report sent to – Name and position	Head of Environment TSUK Operations, TSUK Port Talbot	Date	10/11/2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A - Management - General management	C2 Significant	Permit condition 1.1.1.
IR3A (3) - Emission & Monitoring - Emissions to land.	C2 Significant	Permit condition 3.1.1.
IR1A - Management - General management	C2 Significant	Permit condition 1.1.1.
IR3B - Emission and Monitoring - Emissions of substances not controlled by emission limits	C2 Significant	Permit condition 3.2.3.
IR1D - Management - Efficient use of raw materials	C3 Minor	Permit condition 1.3.1a.

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

Total number of non-compliances recorded	Total non-compliance score
5	128

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?

Compliance Criteria	Action needed	Complete by
IR3B	<p>Action - CAR_NRW0049869. A1:</p> <p>TSUK to ensure the deployed absorbent granules are recovered and disposed of in an appropriate manner.</p>	Immediately
IR1A	<p>Action - CAR_NRW0049869. A2:</p> <p>TSUK is to provide access to the drainage sump associated with the North/South Tank. Once completed, evidence is to be provided to NRW by the action deadline. Going forward, TSUK must ensure that all drainage sumps associated with bunds/vessels onsite are accessible at all times.</p>	14/11/2025
IR1A	<p>Action - CAR_NRW0049869. A3:</p> <p>TSUK is required to safely remove all contaminated sludges from around the base of the South Tank, with particular attention to the area surrounding the sampling point. Evidence is to be submitted to NRW once completed.</p>	28/11/2025
IR3A	<p>Action - CAR_NRW0049869. A4:</p> <p>TSUK is to immediately cease all discharges of potentially polluting liquids into the drainage ditch located behind the PC1/PC2 asset. TSUK must then provide evidence to NRW that <u>all</u> contents within this ditch are routed to the site's effluent treatment system, as previously claimed by the Operative. Until this is submitted, the drainage ditch is not to be used for any further discharge activities.</p>	Immediately
IR1A	<p>Action - CAR_NRW0049869. A5:</p> <p>TSUK is to review their management systems and procedures relating to the activities at the Oil Processing Facility. The outcome of this review is to be submitted to NRW as evidence.</p>	05/12/2025
IR3B	<p>Action - CAR_NRW0049869. A6:</p> <p>TSUK is to commission a review of their secondary containment measures associated with vessels within the Million Gallon Tank works area (and others as identified by TSUK). This review is to be undertaken by a suitably competent person, with a report generated that will be submitted to NRW as evidence. The report must clearly</p>	06/02/2026

Compliance Criteria	Action needed	Complete by
	identify containment deficiencies and include a detailed improvement plan to address the issues.	
IR2C	<p>Action - CAR_NRW0049869. A7:</p> <p>TSUK is to submit a permit variation application to include activities associated with the Oil Processing Facility within their EPR permit without delay. Failure to do so by the specified date will ultimately be considered a contravention of their EPR permit.</p>	31/12/2026
IR1D	<p>Action - CAR_NRW0049869. A8:</p> <p>TSUK is to cease the discharge of water into the overflowing tank immediately (action completed).</p>	Action Completed
IR1A	<p>Action - CAR_NRW0049869. A9:</p> <p>TSUK is required to submit the information requested in the interim email (issued to TSUK on the 21st of October 2025) to NRW by the specified deadline.</p>	14/11/2025

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

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

This Compliance Assessment Report (CAR) is regarding a Site Inspection undertaken by Natural Resources Wales (NRW) on the 17th of October 2025. The visit was to the Port Talbot Steelworks which is managed by Tata Steel (UK) Ltd (TSUK) under permit number EPR/BL7108IM.

Scope

This was a pre-arranged visit conducted in conjunction with an NRW led COMAH inspection. It was overseen by the current NRW COMAH Officer assigned to Port Talbot Steelworks; and represented the second instalment following the initial COMAH inspection (focusing on Secondary Containment) which was undertaken on the 4th of July 2024. The scope of October's visit is outlined below:

- Opening meeting
 - Updates since previous inspection.
 - Morfa Coke Ovens (MCO) by-products inventory
 - Million Gallon Tank (MGT) inspection update
- Site inspection
 - Pheonix Oil Farm.
 - Million Gallon Tanks
 - Oil Processing Facility
- Closing meeting

Site Observations

The Site Walkover component of the visit commenced at 10:45.

Pheonix Oil Tank Farm (POTF)



Image 1: View of the Pheonix Oil Tank Farm

TSUK informed NRW that the vessels (and associated pipework) within the POTF had been emptied and cleaned in preparation for the commencement of decommissioning works. The works area is located within the curtilage of the ABP leased land, and consequently TSUK outlined that they intend to clear this area within the next year.

During the inspection, NRW officers noted evidence of a loss of oil within the POTF “bund”. TSUK confirmed this had occurred during the decommissioning of the connecting pipework, caused by a small quantity of residual product remaining within the pipework. Absorbent granules had been deployed to mitigate the spill; however, these had not been recovered.

TSUK have previously identified that the base of POTF “bund” comprises porous substrate materials – including chippings, sand and slag – which are unlikely to provide adequate containment. TSUK must ensure that a suitable ground investigation is undertaken if it intends to surrender the land currently occupied by the POTF.

Action - CAR_NRW0049869. A1:

TSUK to ensure the deployed absorbent granules are recovered and disposed of in an appropriate manner.

Million Gallon Tanks (MGT)

The area comprises a North Tank, a South Tank and a mobile steel tank currently used as a backup oil tank. NRW understands that the area is managed by a contractor (Runtech Ltd) on behalf of TSUK.



Image 2: Accumulation of hydrocarbon contaminated sludges (visual perspective) around the north-western face of the South Tank

The containment measures associated with the South and North Tanks within the MGT works area appear to consist of earth bunding, the base construction and integrity of which remains uncertain, as confirmed by TSUK at the time.

NRW were informed that Runtech Ltd has been unable to access the sump associated with the earth bund for over 11 months, and consequently the earth bund had not been emptied throughout this period. NRW also noted that the bund was devoid of rainwater. Whilst acknowledging that 2025 has been particularly dry, NRW does consider that sufficient rainfall had occurred in the lead-up to the visit to reasonably expect some accumulation of water within the curtilage of the bund. This raises concerns about the retention capability of the containment measures associated with the North/South Tank, suggesting that in the event of a catastrophic vessel failure (particularly in the case of the South Tank which is said to hold 900,000litres of polluting liquid), its contents may not be effectively contained and ultimately will be lost to ground. NRW understand that the North Tank contains 1.5m – 3.0m of sludges awaiting recovery/disposal.

Compliance:

TSUK has failed to provide safe access points to the sump associated with the earth bunding of the North/South Tanks within the MGT works area. This omission has the potential to impede the contractors (and TSUK) from implementing mitigation measures should a catastrophic vessel failure involving a polluting substance have occurred. This constitutes a breach of permit condition 1.1.1, and consequently a non-compliance score of C2 has been allocated under compliance criteria IR1A – General Management.

Action - CAR_NRW0049869. A2:

TSUK is to provide access to the drainage sump associated with the North/South Tank. Once completed, evidence is to be provided to NRW by the action deadline. Going forward, TSUK must ensure that all drainage sumps associated with bunds/vessels onsite are accessible at all times.

Additionally, concerns were raised about the presence of sludge with visible oil contamination near the northwestern side of the South Tank, which obscured the visibility of the tank's base in that area. TSUK informed NRW within the Opening Meeting that the South Tank had recently benefitted from thickness and weld testing in order to ascertain its condition. It was noted that the majority of the base appeared to have been cleaned, possibly to facilitate this inspection. However, this appears not to be the case for northwestern face (in the vicinity of the sampling point), suggesting this section may not have been fully inspected. The source of the oily sludge is unclear, with a failure of the vessel or spillages during sampling both being viable sources.

Action - CAR_NRW0049869. A3:

TSUK is required to safely remove all contaminated sludges from around the base of the South Tank, with particular attention to the area surrounding the sampling point. Evidence is to be submitted to NRW once completed.



Image 3: Backup oil tank situated within an unlined earth bund, evidence of oil losses outside the curtilage of this earth bunding.

NRW Officers also inspected the mobile steel tank located within the MGT works area. This vessel, currently serving as a backup oil tank, is also proposed to support the cleaning process of the North/South Tanks, something which TSUK has committed to complete by 2027.

Inspection of the current containment measures for the backup oil tank revealed that the unlined earth bunding does not meet the standards outlined in CIRIA C736. Additionally, hydrocarbon staining from historic losses were observed both inside and outside the curtilage of the rudimentary bund. Valves were also found to be left unlocked, increasing the risk of accidental or unauthorised activation and potential further losses to ground. The compliance implications of this insufficient secondary containment relating to the backup oil tank are considered in later sections of this CAR form.



Image 4: Small offtake pipework from the outlet of the back-up oil tank, seen to discharge into the North Tank earth bund.

NRW Officers also noted a small offtake pipe, which was seen to discharge into the earth bund associated with the North Tank. The Runtech Operative was unclear on the purpose of this pipework, and from initial observations and the positioning of the offtake (which was left unlocked), NRW is concerned that this will allow oil to be discharged to ground.

Oil Processing Facility

The Oil Processing Facility consists of PC1/PC2 and the Latex Tank.

PC1 & PC2



Image 5: Side view of PC1/PC2, oil contaminated surface water within the confines of the "tertiary" containment

NRW Officers inspected the PC1/PC2 asset which constitutes the processing component of the facility. The containment measures for PC1/PC2, including associated pipework consist of raised steel bunding around the primary vessel, surrounded by lined earth bunding that provides a level of tertiary containment. While a liner is present beneath the earth bund, NRW is uncertain of its containment capability with visible sections of the buried liner showing signs of degradation upon inspection. Additionally, auxiliary equipment (i.e. valves, pumps and coupling points) are housed within dedicated drip trays. These were seen to contain a quantity of free-phase oil/rainwater.

Several pipework penetrations were noted through the steel bunding associated with the primary vessel, including an outlet valve which is used to manually dewater the bund. This method of dewatering increases the likelihood of free-phase oil being discharged. The Runtech Operative informed NRW that the bund was emptied on a weekly basis, and is reliant on the Operative visually detecting oil within the discharge to prompt its cessation. From this information, NRW considers this indicative of inadequate management systems in place for the Oil Processing Facility, and this is something that must be reviewed by TSUK.



Images 6 & 7: Sump within the tertiary containment area, outlet observed as entering ditch to rear of the bund.

The housekeeping in the area was generally poor, with clear evidence of historic oil staining both inside and outside the curtilage of the earth bunding. Furthermore, significant pooling of contaminated (oily) water was noted along the north-eastern containment boundary (as illustrated in Image 5 above). NRW Officers also noted pooling from beneath the raised steel bund associated with PC1/PC2 which may indicate the presence of a structural failure on the base.

The tertiary containment appeared to be drained via a makeshift sump, fitted with a float activated sump pump, the outlet of which was noted as entering an adjacent ditch (///pizzeria.fuss.interview), positioned behind the asset. Inspection of this ditch from a nearby concrete plinth showed visible signs of contamination being present. The Runtech Operative outlined that this ditch feeds into the drainage network for the Site, however there has been no information submitted to NRW to support this statement. Furthermore, NRW is uncertain on the retention capability of the ditch, and consequently all discharges into this feature must be considered to ground until proven otherwise by TSUK. Similarly to the outlet valve for PC1/PC2, NRW were informed that the control of hydrocarbon discharge to the ditch is reliant on visual detection by the Operative, which is not considered a robust or compliant control measure.

NRW is also concerned that the installation of the makeshift sump may have compromised the integrity of liner associated with the tertiary containment. If this liner is damaged, this would provide a direct viable pathway for contaminants (specifically hydrocarbons in this case) to migrate to ground. Containment measures must adhere to the CIRIA 736 (2014 – *Containment systems for the prevention of pollution; secondary, tertiary and other measures for industrial and commercial premises*) standards and NRW's "How to comply" guidance. TSUK must ensure compliance with permit condition 3.2.3.

Compliance:

The direct discharge of a potentially polluting substance to ground is a contravention of permit condition 3.1.1, consequently a non-compliance score of C2 has been allocated under compliance criteria IR3A (3) - Emissions to Land.

Additionally, the root cause of the permit breach above is considered to be the failure to have sufficient management systems and training in place regarding operation of the Oil Processing Facility. This is a contravention of permit condition 1.1.1, and consequently a non-compliance score of C2 has also been allocated under compliance criteria IR1A – General Management.

Action - CAR_NRW0049869. A4:

TSUK is to immediately cease all discharges of potentially polluting liquids into the drainage ditch located behind the PC1/PC2 asset. TSUK must then provide evidence to NRW that all contents within this ditch are routed to the site's effluent treatment system, as previously claimed by the Operative. Until this is submitted, the drainage ditch is not to be used for any further discharge activities.

Action - CAR_NRW0049869. A5:

TSUK is to review their management systems and procedures relating to the activities at the Oil Processing Facility. The outcome of this review is to be submitted to NRW as evidence.

Latex Tank



Image 8: View of Latex Tank

NRW Officers also inspected the Latex Tank, which is used as a storage vessel for the Oil Processing Facility. Numerous deficiencies were noted during the inspection that outlined that the containment measures associated with the Latex Tank were not in-line with the required standards outlined by CIRIA C736. These include, but are not limited to the following key observations:

- **Bund Construction:** The bund is of masonry brickwork construction, appearing to be two bricks in depth. It is unlikely to be reinforced, which increases the risk of catastrophic failure in the event of surging following vessel rupture.
- **Impermeability:** No impermeable coating was observed on the internal face of the bund. Over time, mortar joints may become porous, potentially allowing contaminants to escape.
- **Structural Integrity:** Linear cracks identified in the render between bricks on the southern and eastern walls.
- **Jetting Risk:** The notable height of the tank increases the risk of jetting should a puncture occur.

Furthermore, NRW Officers had concerns over evidence of oil/water seepage from around the base of the Latex Tank. It was unclear during the inspection whether this was resulting from failure of the primary vessel, or due water ingress behind the damaged insulation layer for the tank. Please be advised that the ingress of rainwater or salt behind the

insulation layering can potentially accelerate corrosion of the primary vessel. TSUK should factor this into their tank inspections and maintenance schedules.

Compliance:

Deficiencies regarding secondary containment measures were identified on all inspected assets. TSUK has failed to ensure that adequate containment measures are in place to prevent the risk of losses to the environment, should a catastrophic failure occur. This is a contravention of permit condition 3.2.3, and due to the number of deficiencies identified, a non-compliance score of C2 has been allocated against criteria IR3B - Emissions of substances not controlled by emission limits.

Further details regarding the minimum requirements for secondary containment can be located here:

[How to comply with your environmental permit](#)

Improvements to containment systems must adhere to the CIRIA 736 (*2014– Containment systems for the prevention of pollution; secondary, tertiary and other measures for industrial and commercial premises*) standards and NRW's "How to comply" guidance.

Action - CAR_NRW0049869. A6:

TSUK is to commission a review of their secondary containment measures associated with vessels within the Million Gallon Tank works area (and others as identified by TSUK). This review is to be undertaken by a suitably competent person, with a report generated that will be submitted to NRW as evidence. The report must clearly identify containment deficiencies and include a detailed improvement plan to address the issues.

It has come to the attention of NRW that the activities associated with Oil Processing Facility are not included within *Schedule 1* of the EPR permit (EPR/BL7108IM). TSUK are required to submit a permit variation application within the next component of their substantial variation (PAN-029148) as a matter of urgency.

A previous CAR form (CAR_NRW0038405, dated April 2021) also highlighted that TSUK had identified deficiencies in the Oil Processing Facility. Consequently, they proposed relocating the facility within the following year, with the newly proposed plant intended to be subject to a permit variation. As TSUK are no longer proceeding with this proposal, this reiterates the need for the existing plant to be incorporated within the EPR permit.

Action - CAR_NRW0049869. A7:

TSUK is to submit a permit variation application to include activities associated with the Oil Processing Facility within their EPR permit without delay. Failure to do so by the specified date will ultimately be considered a contravention of their EPR permit.

Unnecessary Water Usage



Image 9: Overflowing tank associated with Energy Department

During the visit, NRW Officers noted that an asset believed to be associated with the Energy Department of TSUK was overflowing. From onsite discussions, it was unclear how long this asset had been left to overflow and what the purpose for the water usage was.

Compliance:

The observed overflow of the asset associated with the Energy Department represents an inefficient use of raw materials, specifically water in this case. This is contrary to permit condition 1.3.1a, which requires the operator to use raw materials and water efficiently, consequently a non-compliance score of C3 has been allocated against criteria IR1D - Efficient use of raw materials.

Action - CAR_NRW0049869. A8:

TSUK is to cease the discharge of water into the overflowing tank immediately (action completed).

Previously Requested Information/Documents

The below items were requested by NRW via email on the 21st of October 2025.

- Drawing showing the drainage systems in the area surrounding the Waste Oil Treatment Plant and the Million Gallon Tanks (MGT).
- Drawing showing the layout of the Waste Oil Treatment Plant (including dimensions of tanks).
- Max Capacity (brim-full level) of the large vertical tank (Latex Tank).
- Max Capacity (brim-full level) of the smaller horizontal tank (PC1/PC2).
- European Waste Codes (EWC/LoW) for the liquids being processed in the Waste Oil Treatment Plant.
- Capacity of the secondary containment (masonry bund) enclosing the large vertical tank (Latex Tank)
 - Note: The capacity needs to be calculated considering any other tanks or structures within the bund.
- Confirmation whether large vertical tank has been provided with lightning protection.
- Details (if available) of the materials and means of construction used to construct the tertiary containment tray (liner) under the PC1/PC2 tank.
- Details (if available) of nature of any containment provision around and under the Million Gallon Tanks.
- Location plan showing location of any groundwater monitoring points surrounding the Waste Oil Treatment Plan and the Waste Oil Treatment Plant.
- The procedures/ operating techniques that are followed at the Waste Oil Treatment Plant.

Action - CAR_NRW0049869. A9:

TSUK is required to submit the information requested in the interim email (issued to TSUK on the 21st of October 2025) to NRW by the specified deadline.

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.