

Compliance Assessment Report CAR_NRW0050376

Permit being assessed: BX9471IU.

For: Trostre Works EPR/BX9471IU, **held by:** Tata Steel UK Limited

At: Corus UK Ltd , Trostre Works, Llanelli, Carmarthenshire, SA14 9SD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 13/01/2026 between 09:50 and 16:21.

Parts of permit assessed: 3. Emissions and Monitoring..

NRW Lead Officer: Kirsty Thomas, accompanied by Benjamin Taylor, Neil Herbert.

Report sent to: Tata Steel UK Limited, Engineering Manager – Compliance, Environmental and Process Safety Departments, on 23/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
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IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances	C3 Minor	3.2.3

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
not controlled by emission limits		
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor	3.1.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR3B	Action REF CAR_NRW0050376.1 – TSUK are to continue with their monthly groundwater monitoring programme to obtain a twelve month groundwater data set (this may include the 3 months' worth of samples already collected). Groundwater samples are to be taken for the seven boreholes surrounding the ETP as well as an upgradient sample point (unless otherwise agreed with NRW). The groundwater sampling results and a supplementary interpretive report must be submitted to NRW of the findings.	31/10/2026
IR3B	Action REF CAR_NRW0050376.2 - TSUK to submit a copy of their groundwater monitoring sampling procedure.	13/02/2026
IR3B	Action REF CAR_NRW0050376.3 – TSUK to provide an update and a summary of the scope of works for the additional ground investigation required to understand the wider ground conditions. This work should include the review of the feasibility study of the secondary containment of the ETP assets lacking appropriate containment to try and develop a wider solution to the risks from effluent leaks.	30/04/2026
IR3B	Action REF CAR_NRW0050376.4 – TSUK to provide an up	13/02/2026

Criteria	Action needed	Complete by
	to date drainage plan/s of the site, particularly showing the ETP area and showing surface water drainage systems in and around the site boundary.	
IR3B	Action REF CAR_NRW0050376.5 – Whilst utilising the ground investigation work as requested as per action 3, TSUK are to review and provide a further update on other feasible flume containment improvement options (in line with CIRIA 736) taking into account of NRW's initial comments detailed in this CAR.	30/04/2026
IR3B	Action REF CAR_NRW0050376.6 - TSUK/Veolia to provide the SAP/Concept output (or other report) of the area of the recently inspected flume (within the ETP area).	13/02/2026
IR3B	Action REF CAR_NRW0050376.7 - The operator must provide IBCs containing potentially polluting liquids with appropriate secondary containment. TSUK to re-locate IBCs and provide appropriate containment immediately. Provide photographic evidence of actions taken.	23/01/2026
IR3A(3)	Action REF CAR_NRW0050376.8 - TSUK must review their tanker pumping operations for the ETP and implemented improvements to containment measures. Findings to be submitting to NRW.	13/02/2026
IR3B	Action REF CAR_NRW0050376.9 – TSUK to provide safe access points to the surface water stream on the south west boundary of the ETP, to allow visual inspections. Following this exercise TSUK will need to confirm surface water features in these areas.	28/02/2026
IR3B	Action REF CAR_NRW0050376.10 - TSUK must investigate to determine which pipes are still operational and ensure they are appropriately protected from corrosion and/or damage. Where pipework is used to transfer potentially polluting liquids, secondary containment provision will need to be provided. The investigation outcomes must be submitted to NRW.	28/02/2026
IR3B	Action REF CAR_NRW0050376.11 - TSUK to provide copies of the following documents: <ul style="list-style-type: none"> i. copies of the last two, in-service minor inspection reports for both waste oily effluent tanks; ii. copies of the last, out-of-service major inspection in-service reports for the two waste oily effluent tanks; iii. copy of the TSUK risk register, documenting the extensive corrosion damage on both waste oily effluent tanks and the associated mitigation plan; iv. copies of the Planned Preventative Maintenance procedures covering the waste oily effluent tanks and all nine tanks within the tank farm bund. v. copies of the last two, in-service minor inspection 	13/02/2026

Criteria	Action needed	Complete by
	reports, for all nine tanks sited within the tank farm bund; vi. copies of the last out-of-service major inspection reports for all nine tanks sited in the tank farm bund; vii. a copy of the ETP Asset evaluation (update) report that was scheduled to be undertaken in June 2024 (this was the proposed update to the 2012 Jacobs Report "Tata Steel, Trostre Effluent Plant Asset Evaluation" 19 October 2012).	
IR3B	Action REF CAR_NRW0050376.12 - Provide an up to date annotated plan of the ETP and tank farm's tanks and other key vessels. The drawing needs to include the labelling of all key assets such as tanks, lagoons, sumps etc. Where an asset is redundant it should be labelled accordingly on the plan.	13/02/2026

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

See CAR on DMS - [2026 01 13 Compliance Assessment Report for CAR_NRW0050376.pdf](#)

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.