

Compliance Assessment Report for: CAR_NRW0050376

Permit number	EPR/BX9471IU	Operator name	Tata Steel UK Limited
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Site name	Trostre Works
Site address	Trostre, Llanelli, Carmarthenshire, SA14 9DS
Type of assessment	Site inspection

Date of assessment	13/01/2026	Time in	09:50	Time out	16:21
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Parts of permit assessed	3. Emissions and Monitoring.
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NRW Lead officer	Kirsty Thomas	Accompanied by	Neil Herbert, Benjamin Taylor
Report sent to – Name and position	Engineering Manager – Compliance, Environmental and Process Safety Departments	Date	23/01/2026

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR3B - Emission and Monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3
IR3A(3) - Emission & Monitoring - Emissions to Land	C3 Minor	3.1.1

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

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

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR3B - Emissions of substances not controlled by emission limits & IR3A(A) Emissions & Monitoring – Emissions to Land	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.	Groundwater results and supplementary report to be submitted to NRW 1 month after final monthly sample result has been collected.
	Action REF CAR_NRW0050376.2 - TSUK to submit a copy of their groundwater monitoring sampling procedure.	13.02.2026
	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. - Unless otherwise agreed in writing with NRW.
	Action REF CAR_NRW0050376.4 - TSUK to provide an up 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.	13.02.2026
	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. - Unless otherwise agreed in writing with NRW.
	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
	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.	Immediately
	Action REF CAR_NRW0050376.8 - TSUK must review their tanker pumping operations for the ETP	13.02.2026

Compliance Criteria	Action needed	Complete by
	and implemented improvements to containment measures. Findings to be submitting to NRW.	
	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
	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
	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 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). 	13.02.2026
	Action REF CAR_NRW0050376.12 - Provide an up to date annotated plan of the ETP and tank farm's	13.02.2026

Compliance Criteria	Action needed	Complete by
	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.	

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.

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

This Compliance Assessment Report (CAR) sets out the findings of the site inspection carried out by NRW Officers on 13 January 2026 at Tata Steel UK (TSUK) Trostre Works. It also includes NRW's assessment of the information submitted by TSUK in response to previously set CAR actions (CAR_NRW0048997 & CAR_NRW 0046813).

4.1 Background

A loss of containment occurred on site in February 2025, resulting in untreated effluent leaking from the site's effluent flume. The purpose of this visit was to review and discuss the measures implemented following the incident, including proposed improvements to the site's secondary containment systems for the effluent flume and clarifiers.

Note: It was determined that the COMAH Competent Authority (Neil Herbert) would join this meeting to determine whether there were any further COMAH relevant aspects or implications from the incident. It was also an opportunity for the new COMAH (Environment) officer to familiarise themselves with parts of the site. They will be submitting their COMAH relevant findings separately.

Previous compliance reports issued by NRW have already documented the flume leak incident, the subsequent followup visit, and the actions required of TSUK. Prior to the visit, all CAR actions had been recorded as complete, with the exception of the following:

- **CAR_NRW0048997.1** -TSUK must keep appropriate records in accordance with permit condition 1.1.2 and 4.1.1.
- **CAR_NRW0048997.2** - TSUK to provide a feasibility study of providing appropriate secondary containment (in line with CIRIA 736) for the clarifiers which form part of the sites Effluent Treatment Plant (ETP). This study should also detail potential alternative options (if any) should secondary containment be deemed unfeasible. Findings/conclusions of this study, along with a proposed improvement plan must be submitted to NRW for review. This

action is requested alongside the previous action Ref CAR_NRW0046813.1 regarding the initial plans to install a new plastic liner.

- **CAR_NRW0046813.1** – TSUK is to submit their proposal regarding the installation of the new liner (or suitable alternative options) beneath the clarifiers, including details of its composition, specifications and installation methodology for review.
- **CAR_NRW0046813.4** - TSUK to provide a feasibility study of providing appropriate secondary containment (in line with CIRIA 736) for the effluent flume. This study should also detail potential alternative options (if any) should secondary containment be deemed unfeasible. Conclusions generated by the study should be sufficiently justified for review by NRW

TSUK submitted the following documents (within the agreed timeframes) to address these remaining actions:

- *Trostre CAR response – CAR_NRW0048997.*
- *Effluent Flume Secondary Containment Feasibility Study.*
- *Technical Note on a Secondary Lining System for the Effluent Clarifiers at Trostre Steelworks.*

As part of the ongoing works following the flume leak incident¹, TSUK have also completed the installation of new boreholes around the ETP and carried out well condition surveys on the existing boreholes. An updated borehole site plan has also been provided.

Additional groundwater monitoring data has been collected with support by TSUK consultants ECL and an interpretive report of their findings is pending. The aim of the groundwater monitoring and interpretation of the data is to help ascertain whether there has been any deterioration of the groundwater following the February 2025 incident.

4.2 NRW Comments

As part of the opening meeting, TSUK provided NRW Officer with an update on the work undertaken since the incident and gave an overview of the recently submitted documents, including the containment feasibility studies, groundwater monitoring programme and other proposed improvements (particularly to maintenance and inspection of assets).

4.2.1 Groundwater monitoring data and interpretive report

Following the flume leak incident, it was agreed that contaminated chippings beneath the clarifiers were to be cleaned up. However, contaminated material between the flume and clarifiers were deemed too difficult to access and remediate. Therefore an interim position was agreed for the contaminated material to remain in place but for additional groundwater monitoring to be undertaken.

NRW have been in liaison with TSUK over the past several months regarding the groundwater monitoring programme, including the installation of new boreholes.

¹ An interim position was agreed for the contaminated material between the flume and the clarifiers to remain in situ for the time being (given the dense network of pipework in the way) but for additional groundwater monitoring to be undertaken.

As agreed, TSUK have undertaken 3 months' worth of groundwater monitoring for the boreholes around the boundary of the ETP. This data has been shared with NRW. However, NRW are still awaiting the submission of a factual and interpretive report for the groundwater monitoring data. This report must clearly present and explain the results obtained from the monitoring of the selected wells around the ETP, and also compare these against the results from the wider sampling/baseline data. Conclusions on what the new monitoring data shows must be discussed and whether this is in keeping with the wider chemical profile or significantly elevated etc (conclusions of contamination levels post incident). Findings of the interpretive report will help inform next steps.

During the onsite meeting, NRW requested that monthly groundwater monitoring must continue for the seven boreholes² surrounding the ETP area as well as a true upgradient monitoring point (based on the hydrogeological regime) for comparison. Interpretation and long-term monitoring is required to detect any sort of pattern within the data. A minimum of a years' worth of data is typically required to understand seasonal fluctuations.

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.

NRW have also advised that a review of the contaminants of the concern being testing as part of the groundwater monitoring programme must be undertaken. Contaminants of concern associated with site activities are key and should be clarified, ideally as part of the interpretive report.

TSUK must also have an appropriate groundwater sampling procedure document in place.

Action REF CAR_NRW0050376.2 - TSUK to submit a copy of their groundwater monitoring sampling procedure.

4.2.2 Clarifiers - containment feasibility

There are two clarifiers within the site's ETP. The clarifiers are elevated above ground and each have a capacity of 2500m³. Following the incident, TSUK initially outlined their intent to deploy a new liner underneath the clarifiers. After initial investigation into this option, TSUK shared with NRW their concerns on the suitability and practicalities of installing a new liner underneath the clarifiers and suggested that alternative options may be more appropriate.

TSUK provided a feasibility study for providing appropriate secondary containment (in line with CIRIA 736) with a supporting technical note. This included details of the feasibility of a lining system with an accompanying French drain between the flume and clarifier as well as beneath the liner between the two clarifiers to help address the issue of uplift and migration.

² LBH2, LBH4, SPMX, SPM11 (previously referred to as BH1), SPMP9, SPMP12 (previously referred to as BH2), DMBH.

It is believed that the area beneath the clarifiers is underlain by a clay layer, reducing the risk of vertical migration of any lost effluent.

TSUK concludes that:

- *Whilst a lining system beneath the clarifiers is possible, a secondary containment system that captures only 36% of the expected bund capacity of a single clarifier would not be considered compliant with CIRIA C736 and is unlikely to reduce the environmental risk rating. Whilst enclosing the area beneath the clarifiers may offer some level of localised protection from a partial loss of containment of a single clarifier, it would require high investment costs to install, and it would only capture neutralised effluent which has been treated.*
- *It wouldn't offer any protection if a leak was to occur on the flume as it wouldn't address the issue of the migration of effluent.*
- *A fully compliant secondary containment underneath the two clarifiers is not feasible due to the dimensional constraints.*
- *Just like the findings from the feasibility study on the effluent flume, as per CAR action CAR_NRW0046813.6, attempting to retrofit a fully compliant secondary containment around an existing large fixed installation is proving very difficult. Installing a geomembrane lining to cover the full footprint of the two clarifiers is not cost-effective and would offer very little reduction in environmental risk.*

As discussed during the visit, the installation of a liner beneath the clarifiers may also hinder future clean-up operations and also reduce the likelihood of visually detecting any future flume leaks, should they occur.

TSUK Recommendations:

- *To continue with the groundwater monitoring programme as previously agreed with NRW, and to include the newly installed groundwater boreholes to the monitoring programme. As per CAR action CAR_NRW0046813.5. To continue to review and improve the inspection and maintenance regime for the effluent treatment process. This to include:*
 - *Routine visual inspections to the feed and return pipework on the clarifiers.*
 - *Routine visual inspections to the underside of the clarifier structure.*
 - *Periodic engineering internal inspections to the clarifier structure.*
 - *To include the clarifiers to the thermal drone survey programme, which will be carried out three times per year, as per Tata response to CAR action CAR_NRW0046813.2.*
- *To use the data from the groundwater monitoring programme and to conduct a ground investigation to understand the wider ground conditions. This work should include the review of the feasibility study of the secondary containment of the flume to try and develop a wider solution to the risks from effluent leaks.*

NRW can appreciate the complexities and limiting containment benefits of installing a liner underneath the clarifiers. During onsite discussions, NRW advised that TSUK proceed with commissioning of the proposed third party ground investigation work and provide timescales for commencement of such investigation. It is recommended that the scope of such an investigation and its findings is discussed further between NRW, TSUK and their third party contractor. Input from NRW's Geoscience Team will also be sought.

It is anticipated that the investigation of the ground conditions around the site (ETP in particular) will help establish alternative containment solutions that would aid the clarifiers as well as other areas of the ETP that lack appropriate containment e.g. lagoons.

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.

Further groundwater monitoring of the site as discussed in section 4.2.1 should also be used to inform this further investigation work. Consideration should also be given to monitoring all site boreholes, in addition to the seven around the ETP to give a site wider groundwater analysis. When preparing the feasibility study for a wider containment solution, further consideration of leak detection options must also be considered.

NRW welcomes the improvements to the clarifiers inspection frequencies as described and these must be included in the site's management system.

NRW expressed concerns over TSUK's lack of understanding of both site drainage and drainage offsite that could potentially impact the neighbouring surface water ditch/marsh land area south of the site. For example, a presumed sump with headwall was located to the East of the clarifiers. Veolia were uncertain of its connectivity, however were confident that it had been sealed. NRW were informed that liquid in this sump was routinely transferred into the flume via onsite personnel. It is important to note that TSUK Trostre is located within proximity to several designated sites (i.e., *WWT Llanelli Wetland Centre* and the *Burry Inlet and Loughor Estuary SAC/SSSI*) with potentially viable pathways present. TSUK must consider and understand the impacts of drainage to the surface water ditch/marsh land areas surrounding the site (understand impacts loss of containment could have on nearby sensitive receptors).

Action REF CAR_NRW0050376.4 – TSUK to provide an up 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.

4.2.3 Flume - containment feasibility

TSUK have submitted a feasibility study for the secondary containment of the effluent flume within the Trostre works.

Four feasibility options were presented in TSUK's response, with a hybrid approach being the preferred.

TSUK concludes that:

- *Full length secondary containment is not feasible due to the low invert levels of the inlet pipework entering the flume combined with the fact that internal routing within the flume would not be possible due to dimensional constraints.*

- *Installing dual containment pipework externally to the flume would pose similar issues of low invert levels connections along with the complex modifications required to the existing flume and equipment in the effluent plant area to accommodate the new pipework.*
- *Constructing a new flume based on the existing design, but at a larger scale to accommodate an internal flume as outlined in option 3 is likely to be both cost-prohibitive and operationally disruptive.*
- *A hybrid approach combining partial secondary containment and targeted overhaul of existing flume sections offers a more practical and compliant solution.*

TSUK recommendations:

- *The installation of a 500mm diameter 316L stainless steel pipework or suitable alternative from the Pickle Line to K line using the existing flume as secondary containment for approximately 450m to partially satisfy CIRIA 736. Pipework to be terminated at the K Line junction, cast into a concrete wall and fed into the existing open flume to the effluent plant. Pipework to be supported on galvanised pipe support systems hung from existing flume walls. Cost estimate ~£520k.*
- *Existing interceptor surface water inlet currently directed into flume to be diverted and hard piped externally along the flume and discharged into the marsh at discharge point W2 (receiving water is river Loughor at NGR SS5266 9905). This will alleviate the load on the effluent plant to treat the water before discharge. Cost estimate to install 330m of Ø250mm steel pipework ~£190k.*

During onsite discussions, it became clear that the proposed option would not provide a complete secondary containment solution. NRW is concerned that the option presented represents only a partial solution and would not address the issues associated with the perceived higher risk section of the flume, specifically within curtilage of the ETP. Furthermore, it is considered that the proposed design had the potential to introduce additional problems in the future.

NRW recommends that TSUK look at what other options are available and use information from the groundwater monitoring programme and additional ground investigation work to assist with option considerations. Further discussions will be required.

As with the clarifiers, further consideration of leak detection measures should also be considered for the effluent flume.

Improved inspection and maintenance of the flume is of importance. TSUK must review and update their maintenance philosophy accordingly.

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.

CAR Actions CAR_NRW0046813.1, CAR_NRW0046813.4 and CAR_NRW0048997.2 are considered complete and are now superseded by the new actions set in this CAR.

NRW also considers action CAR_NRW0048997.1 complete.

4.3 Site inspection observations

Following the initial meeting to discuss the topics listed in section 4.2, NRW Officers proceeded to the site's ETP area for inspection. Veolia staff also joined the inspections as they still manage the ETP operations at Trostre on TSUK's behalf.

The effluent flume was seen to be flowing as normal and TSUK confirmed a recent inspection and maintenance of a section of flume (section within the ETP compound) had recently been completed. Improvements have also been made to one of the piped inlets to the flume, which has now been replaced with flexible hoses routed through a purpose built impermeable channel. This forms part of TSUK's ongoing continuous improvement programme to review and reroute pipework that penetrates the flume walls. The previous flume leak was determined to have been caused by long term expansion and contraction of rigid pipework, which ultimately distorted and cracked the fibreglass lining.

TSUK confirmed the recent flume inspection work was undertaken by an independent third party competent company, Crane Engineering with support by Veolia staff. This work is part of the annual inspection programme for the flume (where the flume is divided into four sections, with one section being inspected every year). TSUK verbally confirmed that no issues were identified.

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).

Chipping clean up underneath the clarifiers has progressed but had not yet finalised. Stockpiles of clean chippings were present on land next to the clarifiers. These had undergone testing and had been stored on top of a plastic liner.

After the recent heavy rainfall, water had accumulated beneath the clarifiers. TSUK confirmed that a tanker would shortly remove this pooled water and return it to the ETP waste stream. TSUK informed NRW that the accumulation of water beneath the Eastern clarifier is a common and recurring issue, which makes it difficult for onsite personnel to identify potential leaks during their routine visual inspections. As a result, TSUK explained that they undertake regular water quality analyses to verify that the waterbody is consistent with rainwater/expected runoff concentrations (NRW have not seen any details or evidence of this testing).

IBCs containing potentially polluting chemicals within the ETP area without adequate secondary containment were observed. This included bunds being full of rainwater reducing the containment capacity, structurally compromised (i.e. impact damage) and inadequately sized bunds in place (as shown by Images 1 & 2).

Within the IBCs, liquids including sodium hydroxide and sulphuric acid were being stored and were located with close proximity to the perimeter fence and surface water receptors. The IBCs were not located on an area of impermeable ground and therefore could be a direct pathway to soil, groundwater and/or the nearby surface water features south of the ETP.



Images 1 & 2 – IBCs with lack of appropriate containment.

Such substances, whose emission to water or land could cause pollution, were not suitably isolated from direct discharge to the environment or stored in an area that could effectively contain a spill or leak and therefore is a non-compliance with the permit.

Compliance assessment - The inadequate storage of potentially polluting chemicals is considered a breach of permit condition 3.2.3 - *“All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.”*

A non-compliance score of C3 has been attributed to this permit contravention (against sub-criteria IR3B). NRW will escalate it's response and non-compliance scoring should such matters persist.

The operator must store all potentially polluting liquids with appropriate secondary containment and in a designated area, which is isolated from direct discharge to the environment to the extent where the storage area should be able to safely contain any spill or leak.

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.

The root cause of this inadequate containment has not been assessed as part of this assessment and will be considered as part of future inspections should re-occurrence of the issue exist. TSUK must establish the root cause of this failure and implement appropriate action to prevent re-occurrence.

NRW Officers also observed tankering operations being undertaken in the ETP involving the discharging of pumped effluent from the site back into the ETP. NRW shared concerns regarding the tanker connection points and pumping into the effluent flume/lagoons with a lack of appropriate containment measures in place. There were multiple connection points and evidence of spills to ground, therefore risk of pollution (Image 3). TSUK must review their tanker pumping operations and containment measures.



Image 3

Compliance assessment – The tankering connection points (pipework) were not provided with secondary containment (or other appropriate containment measures) and therefore can also be considered a breach of permit condition 3.2.3. Connections points/pipework did not appear to be in a suitable contained area or within a sealed drainage system and a failure could result in a release onto land and/or into clean surface water systems.

In accordance with NRW's guidance, the multiple permit breaches for condition 3.2.3 will be consolidated into one non-compliance score.

The leakage of effluent onto unlined ground from tanker connection points is also considered a breach of permit condition 3.1.1 (*“there shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2”*). A non-compliance score of C3 has been attributed to this permit contravention (against sub-criteria IR3A(3) - Emissions to land). NRW will escalate its response and non-compliance scoring should such matters persist.

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.

As mentioned, activities undertaken in the ETP are in close proximity to the site boundary. Access to the surface water features (streams and drainage ditches) south of the ETP area is currently very limited. During discussions, it was agreed that vegetation should be cut back at strategic points to improve access to the nearby stream and facilitate visual inspections.

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.

NRW Officers were also concerned with a collection of pipework within the ETP which appeared to be badly corroded and partly buried (Image 4). It is NRW's understanding that this area is made (permeable) ground and provides a potential pollution pathway to soil and groundwater



Image 4 corroded and partially buried pipework

TSUK/Veolia claimed some pipework in this area is redundant but also stated that some pipe runs were operational.

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.

NRW Officers further inspected the chrome and waste oil tank areas of the ETP. NRW has concerns regarding the extent of corrosion observed on the roofs of several tanks but of immediate concern were the roof condition of the two waste oily effluent tanks within the ETP. Large sections of the roof were found to be severely degraded and entirely missing in some points. Whilst this may pose both a safety and environmental risk it also raises concerns about the site's general preventative maintenance programme of the ETP's tanks. This needs immediate investigation by TSUK to ensure that the structural integrity of the tanks has not been compromised.



Images 5 & 6 – corrosion on tank roofs

TSUK/Veolia have stated that this issue has been identified already and recorded on their risk register. However, NRW is concerned that the problem may have persisted for some time without corrective action being implemented. TSUK/Veolia must urgently review and assess the integrity of these tanks and ensure that the risk register accurately reflects the current situation and provide proposed timetable for remediation.

There is a concern that aging plant is not adequately being maintained and there could be potential general management failures. NRW has not assessed the root cause into the poor condition and maintenance of these tanks as part of this assessment and are now subject to ongoing investigation and will be determined at a later date.

Action REF CAR_NRW0050376.11 - TSUK to provide copies of the following documents:

- viii. **copies of the last two, in-service minor inspection reports for both waste oily effluent tanks;**
- ix. **copies of the last, out-of-service major inspection in-service reports for the two waste oily effluent tanks;**
- x. **copy of the TSUK risk register, documenting the extensive corrosion damage on both waste oily effluent tanks and the associated mitigation plan;**
- xi. **copies of the Planned Preventative Maintenance procedures covering the waste oily effluent tanks and all nine tanks within the tank farm bund.**

- xii. **copies of the last two, in-service minor inspection reports, for all nine tanks sited within the tank farm bund;**
- xiii. **copies of the last out-of-service major inspection reports for all nine tanks sited in the tank farm bund;**
- xiv. **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).**

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 includes 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.

4.4. Outstanding CAR Action

The following action from compliance report CAR_NRW0046348 remains outstanding:

TSUK to confirm and provide evidence that pH readings for W2 are within permit limits since probe replacement.

TSUK must provide an immediate response.

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	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 and Landfill 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.