

Compliance Assessment Report CAR_NRW0050734

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: Site Inspection,

Reason: Routine.

On: 21/01/2026 between 09:00 and 16:00.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor, accompanied by Kirsty Thomas, Rhodri Morgan.

Report sent to: Head of Environment, Tata Steel UK Ltd, on 31/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR1A - Installations - Management - General Management	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)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor	Permit condition 3.1.1.
IR1A - Installations - Management - General Management	C3 Minor	Permit condition 1.1.1.
IR1A - Installations - Management - General Management	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
IR1A	CAR_NRW0050734.A1: TSUK is to confirm to NRW whether the remedial works on Middle Outer Crane (AA146) have been completed. If these works have not yet progressed, TSUK must provide an update outlining when the works are scheduled to be undertaken.	17/04/2026
IR3B	CAR_NRW0050734.A2: TSUK is to provide an update on the progress with works associated with CAR_NRW0049869.A4.	22/04/2026
IR1A	CAR_NRW0050734.A3: In addition to providing an updated copy of the procedure for processing waste oil at the MGT, TSUK must provide a copy the environmental risk assessment for the OPF activities including details of any associated mitigation measures.	22/04/2026
IR3B	CAR_NRW0050734.A4: TSUK is to submit the report detailing the conclusions of the works actioned by CAR_NRW0049869. A6 by the specified deadline. If these works have not yet progressed, TSUK must provide an update outlining when they are scheduled to be completed.	27/04/2026
IR3B	CAR_NRW0050734.A5: TSUK should investigate whether there is a risk of contaminants leaving the curtilage of the earth bund associated with the North/South Tank in the event of a catastrophic failure. Once completed, the conclusion is to be submitted to NRW as evidence.	01/05/2026
IR3A(3)	CAR_NRW0050734.A6: TSUK must ensure, if they have not already done so, that the outlet gully associated with the Latex Bund is flowing freely. TSUK is also required to confirm the connectivity of this drainage feature before commissioning any works to divert surface water from PC1/PC2. This information must be submitted to NRW as evidence.	17/04/2026
IR1A	CAR_NRW0050734.A7: In addition to CAR_NRW0050734.A3 TSUK must undertake a review of its management systems within the Oil Processing Facility to ensure that drainage infrastructure remains free-flowing at all times, thereby preventing any risk of surface flooding involving potentially contaminated water.	15/05/2026
IR1A	CAR_NRW0050734.A8: TSUK is required to provide NRW with an update concerning the alleged malfunction of the high-level alarm system associated with the Latex Tank within the Oil Processing Facility.	17/04/2026

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

Introduction

This Compliance Assessment Report (CAR) is regarding a Site Inspection undertaken by Natural Resources Wales (NRW) on the 21st of January 2026. The visit was to the Port Talbot Steelworks which is managed by Tata Steel (UK) Ltd (TSUK) under permit number EPR/BL7108IM.

Scope

This visit was pre-arranged, serving as a follow-up to address non-compliances identified during a previous inspection of the Oil Processing Facility (OPF) (see *CAR_NRW0049869*). The visit also provided an opportunity to discuss the recent noise issues experienced by the community, followed by an inspection of the confirmed source (Hot Rolling Mills (HRM) internal crane). The scope of the visit is detailed below:

- Opening meeting
 - WIRS/Complaint Discussion
 - HRP Crane Maintenance
 - Incident Updates
 - S5N_25_07B – LSO (W1) Fe Exceedance
 - S5N_25_08B – LSO (W1) Fe Exceedance
 - S5N_25_10B – LSO (W1) Fe Exceedance
 - Oil Processing Facility Discussion
- Site Inspection
 - Oil Processing Facility
 - EAF Project
 - HRP Cranes
- Closing meeting

Opening Meeting

NRW officers arrived at 10:00 and were met by representatives from TSUK. The visit began with an opening meeting, during which TSUK presented material based on the agreed agenda. The key points from this presentation are summarised below:

WIRS/Complaint Discussion

- 28 complaints since October visit.
 - 4 odour complaints.
 - Complaints described a chemical-type odour, occurring on days when the OPF was operating.
 - TSUK's investigation identified an odour trajectory indicating the OPF as the likely source.
 - Atmospheric pressure at the time of complaints (1010–1020 mb) was noted as optimal for odour detection.
 - Odour was generated by steam released from an open vent on the Processing Tank. This venting is necessary to prevent the tank becoming a pressurised vessel.
 - Steam is produced during the boiling process used to separate water from oil; TSUK advised this process is variable and depends on the water content of incoming oil.
 - TSUK is assessing the feasibility of installing carbon filters as a mitigation measure and is also developing an enhanced odour-monitoring regime (e.g., installing monitors around the OPF).
 - TSUK emphasised to NRW that odour abatement measures are a higher priority than additional monitoring alone.
 - TSUK is also exploring whether the process can be changed to an alternative processing system.
 - TSUK must keep NRW updated as work on these odour mitigation measures progresses.
 - 24 noise complaints.
 - 23 of these attributed to the HRM internal crane (reports of whirring sounds).
 - TSUK have shared a community update via their Social Media channels to reassure the public that they are addressing the noise issues.

HRP Crane Maintenance

- TSUK has identified that the noise is originating from the *First Reduction Spur Gearbox* on the *Middle Outer Crane (AA146)*. The noise correlates with increases in torque and consequently, is exacerbated during instances of

acceleration/deceleration.

- The affected crane is one of the primary units used to supply slab to the Reheat Furnaces within the HRM Works Area.
- TSUK outlined that the issue developed rapidly, with an oil sample taken six weeks prior to the first complaint showing no signs of abnormality.
- TSUK is currently minimising the use of AA146 where operationally possible, instead prioritising the *Northern Crane (AA54)*. However, during periods of higher production demand, use of AA146 remains necessary.
- Due to the age and design of AA146, there is increased difficulty in sourcing suitable replacement parts.
- Remedial works are scheduled for the week commencing the 23rd of February 2026, with the refurbished gearbox component expected to be delivered on the 9th of February 2026.
- TSUK are confident that the repairs will significantly reduce noise levels, though complete elimination of noise is not expected.
- TSUK outlined future proactive maintenance checks on the remaining two internal cranes, which have similar drive shaft mechanisms.

Action:

CAR_NRW0050734.A1: TSUK is to confirm to NRW whether the remedial works on Middle Outer Crane (AA146) have been completed. If these works have not yet progressed, TSUK must provide an update outlining when the works are scheduled to be undertaken.

Incident Updates

S5N_25_07B/S5N_25_08B – LSO (W1) Iron exceedance

- TSUK confirmed that the loss of containment within the Pickling Line originated from a corroded bolt on the Acid Storage Tank, which ultimately affected compliance with the iron limit at emission point W1.
- This issue took several weeks to identify and remediate, which resulted in contribution to further exceedances (S5N_25_08A/8B).
- During the Level 3 Investigation, it was identified that excess water from the FCS Shed (which included contaminated water from the Pickling Line) was being diverted to a sump associated with the Deep Drain System. This diversion resulted in the bypass of treatment within the Cold Mill ETP for the transferred water.
- The Deep Drain System typically is used to receive and transfer surface water for the Site, and as a result should not have been used in this instance for effluent.
- TSUK advised that their ETP contractor was unaware at the time that this diversion would impact the Deep Drain System, and that these impacts may have become more noticeable following the shutdown of the Heavy End.
- To prevent future recurrence, TSUK informed NRW during the visit that they

have reviewed their ETP processes and drainage, ensuring that all water is now routed through the ETP for treatment.

- Additionally, TSUK are in the process of implementing a procedure for abnormal operating conditions whereby flows will be diverted to the FCS Neutralisation Tank in order to increase retention time and improve pH control (i.e., through the addition of lime). This procedure introduces a secondary pH control point to facilitate the precipitation and removal of iron from the discharge. TSUK also confirmed that, in any future containment loss events, their ETP contractor will apply additional manual pH correction via lime dosing.
- This iron breach has already been assessed and scored by NRW under *CAR_NRW0050565* and therefore will not be reassessed in this document.
- TSUK must ensure drainage plans and any diversion procedures are up to date. NRW will inspect the Ferric Chloride Solution Tank Farm/Cold Mill ETP as part of a future compliance visit.

S5N_25_11B - LSO (W1) Iron exceedance

- TSUK attributed this breach to an intense rainfall event, during which a yellow weather warning was in place. The heavy rainfall caused significant mobilisation and entrainment of solids (including Iron) within the site's drainage system which ultimately affected compliance with the iron limit at emission point W1.
- TSUK advised that residual solids within Sump 5 and Sump 2 were likely contributing factors and presented a risk of further exceedances during future high-rainfall events. Both sumps were mechanically serviced on the 20th and 21st of January 2026 respectively. These works will now be included in an annual maintenance schedule.
- TSUK stated that a new procedure has been implemented whereby, during future severe weather warnings, strategic sumps will be reviewed and may be diverted to Nautilus to prevent recurrence.
- This has not been compliance assessed at this time, as scores relating to these iron breaches in Q4 have already been attributed within *CAR_NRW0050735*.

Oil Processing Facility Update

- TSUK provided information pertinent to a series of outstanding actions which were contained within *CAR_NRW0049869*:
 - ***CAR_NRW0049869. A2 (action complete)***
 - Evidence of access to sumps associated with MGT earth bund provided.
 - ***CAR_NRW0049869. A3 (action complete)***
 - Sludges removed from around the base of the of the South Tank.
 - Samples taken to determine waste disposal route/costs.

- **CAR_NRW0049869.A4 (action ongoing)**

- Temporary solution, utilisation of IBC to collection sump discharge. Re-circulated into oil processing facility.
- Proposed permanent solution, installation of a pump/pipework to divert flow to oil separator within the adjacent Latex Bund.
- Recommend that TSUK undertake dye tracing to confirm that the gully used as the Oil Separator outlet connects to the effluent treatment system.

Action:

CAR_NRW0050734.A2: TSUK is to provide an update on the progress with works associated with CAR_NRW0049869.A4

- **CAR_NRW0049869. A5 (action complete)**

- Review of Working Instructions and Operating Procedures undertaken.
- Gaps were identified during the review, and the working instructions have been updated and communicated to Runtech. These inadequacies have already been assessed and scored by NRW under CAR_NRW0049869 and therefore will not be reassessed.
- TSUK submitted a Job Method Statement (*Tata Steel UK JMS Processing of waste oil at MGT (2)*) dated 26/09/2025 ahead of the Site Inspection. Since then TSUK has conducted a review on the relevant working instructions above, NRW has not received the updated working instructions and therefore cannot establish the changes that have been made.

Action:

CAR_NRW0050734.A3: In addition to providing an updated copy of the procedure for processing waste oil at the MGT, TSUK must provide a copy the environmental risk assessment for the OPF activities including details of any associated mitigation measures.

- **CAR_NRW0049869. A6 (action overdue)**

- Bund associated with the Latex Tank confirmed to be sufficient capacity in-line with CIRIA C736.
- TSUK outlined on the day that the investigation into bund integrity would be conducted by third-party contractor on the 22nd of January 2026. To date, NRW is yet to receive the

report detailing the conclusion of this investigation, or received confirmation that the works had gone ahead as proposed.

Action:

CAR_NRW0050734.A4: TSUK is to submit the report detailing the conclusions of the works actioned by CAR_NRW0049869. A6 by the specified deadline. If these works have not yet progressed, TSUK must provide an update outlining when they are scheduled to be completed.

- TSUK also provided an update regarding the decommissioning of the Million Gallon Tanks (MGT).
 - TSUK is seeking a cost-effective approach for the decommissioning of the North and South Tanks.
 - TSUK proposes installing a new valve higher up the tank to enable the removal of oil for processing. This will help provide an indication of the timescales required for full decommissioning.

Site Inspection: Observations

Million Gallon Tanks (MGT)



Image 1: Potential pathway outside of the earth bunding associated with the North/South Tank

On arrival, NRW Officers noted that the pump associated with dewatering the North/South Tank earth bund was in operation. Runtech operatives claimed that the bund had been filled with water prior to arrival, however only a small quantity of water was observed by NRW at the time of the inspection. It was noted that since the previous visit, TSUK has reduced the quantity of oil contaminated sludges which were obscuring the base of the South Tank.

During the inspection, NRW Officers identified a masonry brick built channel which appeared to encapsulate redundant pipework associated with the presumed former coupling point of the vessels. It is unclear from the surface whether this may provide a potential pathway for contaminants to exit the earth bund should a catastrophic failure occur.

Action:

CAR_NRW0050734.A5: TSUK should investigate whether there is a risk of contaminants leaving the curtilage of the earth bund associated with the North/South Tank in the event of a catastrophic failure. Once completed, the conclusion is to be submitted to NRW as evidence.

Oil Processing Facility



Image 2 & 3: Outlet pipe associated with Latex Tank appeared to be flooded, allowing for a release of water to ground behind the bund.

NRW Officers confirmed that TSUK/Runtech are no longer discharging contaminated water from the bund associated with PC1/PC2 into the drainage ditch located behind the asset.

During the visit, TSUK stated that this drainage ditch is connected to the Arnallt Culvert, with any inputs into the ditch ultimately feeding into this Culvert and discharging to the marine environment. This has been previously assessed and scored within *CAR_NRW0049869*.

It was noted during the inspection that the outlet gully receiving water from the oil separator within the Latex Bund appeared to be blocked, resulting in an accumulation of surface water in the immediate vicinity of the drainage feature. NRW understands that the proposed arrangement is for surface water from the PC1/PC2 containment to be directed to this oil separator prior to discharge via this gully. TSUK must understand the connectivity of this drainage feature before they install this diversion, and will need to remedy the suggested blockage within the outlet pipework. Due to the design and class of the oil separator and activities undertaken within the bund, any discharge from the asset must enter the foul/effluent drainage network.

Compliance:

Due to this blockage, surface water was being discharged to ground to the rear of the Latex Bund. Furthermore, iridescence consistent with the presence of hydrocarbons was also observed upon the water surface. This constitutes an unauthorised emission to ground and is a contravention of permit condition 3.1.1. Consequently, a non-compliance score of C3 has been allocated against permit criteria IR3A(3) – Emissions to Land.

Action:

CAR_NRW0050734.A6: TSUK must ensure, if they have not already done so, that the outlet gully associated with the Latex Bund is flowing freely. TSUK is also required to confirm the connectivity of this drainage feature before commissioning any works to divert surface water from PC1/PC2. This information must be submitted to NRW as evidence.

Additionally, the root cause of the permit breach above is considered to be insufficient management systems regarding operation of the Oil Processing Facility. This is a contravention of permit condition 1.1.1, and consequently a non-compliance score of C3 has also been allocated under compliance criteria IR1A – General Management.

Action:

CAR_NRW0050734.A7: In addition to *CAR_NRW0050734.A3* TSUK must undertake a review of its management systems within the Oil Processing Facility to ensure that drainage infrastructure remains free-flowing at all times, thereby preventing any risk of surface flooding involving potentially contaminated water.

It was noted during the visit that the beacon associated high level alarm system of the Latex Tank was activated, when questioned, there appeared to be uncertainty over how long this had been the case. This suggests that there may be inadequate checks being undertaken of the Oil Processing Facility. The nearby pressure dial illustrated that the

contents of the vessel was 60% which TSUK indicated suggested that there was a fault with the high-level alarm system. NRW were reassured that onsite electricians would investigate and address the alarm fault should one be identified.

Action:

CAR_NRW0050734.A8: TSUK is required to provide NRW with an update concerning the alleged malfunction of the high-level alarm system associated with the Latex Tank within the Oil Processing Facility.

NRW continues to remain concerned regarding the environmental impacts associated with the operation of the OPF. It is imperative that TSUK prepare and submit a permit application for inclusion of the activity. The activity must be captured in the site's EMS and operate in accordance with BAT. This has already been the subject of a previous action (CAR_NRW0049869. A7) and consequently, there is an expectation that a variation application will be submitted within the latter stages of 2026.

Electric Arc Furnace (EAF) Project

TSUK are progressing with the site transition to EAF steelmaking. NRW Officers observed the infilling of the BOS lagoon associated with the EAF Project from the nearby viewing platform.

Hot Rolling Mills Internal Crane



Image 4: View of faulty Middle Outer Crane (AA146) associated with the Hot Rolling Mills

NRW Officers visited the area where the Middle Outer Crane (AA146) is located. This asset has been the subject of numerous noise complaints from the local community, as outlined in an earlier section of this CAR form. Although the crane was not in operation at the time of the visit, TSUK operated it upon request for the benefit of NRW.

Closing Meeting

The visit concluded with a Closing Meeting where NRW Officers summarised the observations made on the day.

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.