

Compliance Assessment Report CAR_NRW0051576

Permit number	BS3905IP	Operator name	Tata Steel UK Limited
----------------------	----------	----------------------	-----------------------

Site name	Tata Steel UK Limited
Site address	TATA Steel Strip Products UK, Llanwern Works, Newport, NP19 4QZ
Assessment type	Compliance Inspection

Date of assessment	25 February 2026	Time in	10:30	Time out	14:15
---------------------------	------------------	----------------	-------	-----------------	-------

Parts of permit assessed	See Part 4
---------------------------------	------------

NRW Lead officer	Guy Baskerville	Accompanied by	N/A
Report sent to – Name and position	[REDACTED] Fire & Environment Manager	Date	24 April 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	Assessed or assessed in part (A)	2.4.2

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

Total number of non-compliances recorded	Total non-compliance score
0	0

2. What action is required?

Criteria	Action needed	Complete by
N/A	N/A	N/A

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.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' findings following a compliance assessment undertaken at Llanwern Steelworks on 25 February 2026.

Attendees:

Natural Resources Wales

Guy Baskerville [Lead Specialist]

Tata Steel UK Limited

REDACTED [Fire & Environment Manager]

REDACTED [Head of Environment]

REDACTED [Stranded Assets Manager]

REDACTED [Manufacturing Manager]

REDACTED [Head of Engineering Services]

N.B. The environmental permit was issued in 2004 and has been subject to 2 non-consolidated variations since issue. In recent years, the scope of the operations have reduced significantly and many of the activities authorised by the environmental permit have ceased permanently. The Best Available Techniques (BAT) Reference Document for *Ferrous Metal Processing – Forming* operations has not yet been published, and the environmental permit has not been subject to a review and reformatted with modern permit conditions.

Automotive Finishing Line Oil Storage Measures

Condition 2.4.2 of the environmental permit states:

All oil and chemicals shall be stored in designated containment areas which shall be bunded or kerbed to contain any spillage. The capacity of the bunds shall be calculated to give containment for 110% of the total volume for single tanks and hydraulically linked tanks. Where two or more tanks are installed within the same bund, 110% of the largest tank or 25% of the total capacity of all tanks, whichever is the greater shall be used. The bunds shall be inspected on a regular basis to ensure they are substantially clear of material loss or rainwater and a record of the inspection maintained in the plant operational records.

Oil storage arrangements at the Automotive Finishing Line (AFL) were assessed for compliance with condition 2.4.2 and with The Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.

The AFL is located within the cold-rolled products building, which is of robust, weatherproof construction. The oil storage area is served by a concrete base and is enclosed by fixed traffic control barriers to protect containers from accidental damage by site traffic. Oils are stored in 1000-litre Intermediate Bulk Containers (IBCs), each positioned on a dedicated 1100-litre IBC spill pallet. All IBCs and spill pallets appeared to be of sound construction and in good condition, with no evidence of damage, deterioration or leakage. The concrete floor was also observed to be clean and in good condition; however, it is not served by any tertiary containment measures (e.g. kerbs or lips) to prevent the escape of liquids. Oils are transferred from the IBCs to the AFL via remotely controlled pneumatic pumps. Flexible transfer hoses are not provided with secondary containment measures but span the concrete apron. Spill kits are located immediately adjacent to the IBCs and soiled absorbent mats were observed beneath the pneumatic pumps.

Photographs of the oil storage area are presented in figure 1 and figure 2 (below).

Based on observations made during the inspection, the storage and handling of oils at the AFL were found to be in compliance with Permit Condition 2.4.2 and The Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.



Photographs 1 & 2. Oil storage arrangements at the Automotive Finishing Line (AFL)

Lagoon 14 Efficacy and Maintenance

Condition 6.3.2 of the environmental permit states:

Limits for the emissions to water for the parameter(s) and emission point(s) set out in Table 6.3.3 shall not be exceeded.

Table 6.3.3 of the environmental permit is reproduced below.

Table 6.3.3: Emission limits into water		
Parameter	Emission Point W1	Monitoring frequency
Flow rate	28000 m ³ /day (dry weather)	Continuous
pH min	6	
pH max	12	
Total hydrocarbon oil ⁽³⁾	5 mg/l	Weekly average
Suspended solids ⁽¹⁾⁽²⁾⁽³⁾	100 mg/l	
Dissolved iron ⁽¹⁾⁽³⁾	10 mg/l	
Total chromium ⁽¹⁾⁽³⁾	0.2 mg/l	
Dissolved nickel ⁽¹⁾⁽³⁾	0.2 mg/l	
Zinc ⁽¹⁾⁽³⁾	2 mg/l	
Copper ⁽¹⁾⁽³⁾	0.1 mg/l	
Lead ⁽¹⁾⁽³⁾	0.8 mg/l	
Cadmium ⁽¹⁾⁽³⁾	0.05 mg/l	
Mercury ⁽¹⁾⁽³⁾	0.05 mg/l	

³ Limit shall be complied with if 95% of all weekly representative spot samples during a rolling half year period do not exceed the limit value given in Table 6.3.3 and the peak spot sample value does not exceed 1.5 times the limit value.

The operator notified NRW of an exceedance of the permitted emission limit for *total hydrocarbon oil* at W1 on 01 October 2025. Non-compliance scores were levied in relation to this breach of permit condition 6.3.2 and recorded in Compliance Assessment Report CAR_NRW0050903. The below action was set to prevent a reoccurrence of this permit condition breach.

Action 1: Undertake measures to prevent reoccurrence of the exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.

In November 2025, the operator trialled revised oil/hydrocarbon control measures at lagoon 14, involving alternative oil absorbent booms in a different arrangement (see photograph 3). The operator also undertook vegetation clearance across lagoon 14 to prevent potential disturbance of the booms. No exceedance of the permitted emission limit for total hydrocarbon oil at W1 have been reported in the period between the instating of the new oil/hydrocarbon control measures and the date of issue of this report. The operator also confirmed that lagoon 14 was last desilted in August 2024.



Photograph 3. Lagoon 14 and revised oil/hydrocarbon control boom arrangement,

Operational Updates

Hot Mill Decommissioning and Demolition

The Head of Engineering Services provided an update in relation to the planned decommissioning and demolition of the Hot Mill and associated infrastructure and equipment. The operator estimates the project length to exceed 3 years (to reach ground level only), but shall progress the partial surrender application to remove the footprint of the Hot Mill from the environmental permit during that period. Ground Investigations (GI) to support the partial surrender application are planned to be undertaken through 2026.

Representatives from the contractor undertaking the decommissioning and demolition project (Haywood Crushing Demolition Limited - Company number 08948772) were also in attendance and presented elements of the Demolition Environmental Management Plan (DEMP). A DEMP is a requirement of the planning permission authorising the demolition project. Noise, vibration and dust control measures were discussed alongside complaint management and response procedures. The regulatory framework applicable to amenity impacts arising from the decommissioning and demolition project has not yet been determined. NRW will discuss this matter with Newport County Council and provide feedback to the operator.

An asbestos survey has been undertaken at the Hot Mill and it is envisaged the removal programme will be ~40 weeks.

Other Permitted Operations

Cold Mill and Pickle Line 1 operations have been mothballed, and shift patterns at the Zodiac Plant, Automotive Finishing Line, Hot Coil Finishing and Pickle Line 2 have been adjusted to meet reduced demand.

Lagoon 27

Lagoon 27 is a legacy storage area for oily mill scale and Basic Oxygen Steelmaking (BOS) slurry. It is a discrete parcel of land, located away from the wider steelworks, and is divided into 4 distinct quadrants. The operator has held protracted discussions with NRW in relation to recovery of deposited wastes, cell stabilisation, capping and

ongoing monitoring requirements. The operator proposes to incorporate three recovered cells (L27NW, L27NE and L27SE) into the wider South Side of Queensway remediation project for future industrial/commercial use. The remaining quadrant (L27SW) is proposed to be incorporated into Lagoon 25 (which is not part of the permitted area) and form the foundation of a proposed Battery Energy Storage System (BESS).

BAT Conclusions for the Ferrous Metals Processing (Forming) Sector

The formal draft of the BAT Conclusions for the Ferrous Metals Processing (Forming) Sector and supporting documents are now available to view [here](#). Please note that these documents are the outputs from the Technical Working Group meetings and are for information only. A formal public consultation on these documents is required, where views will be sought (via [NRW Citizen Space](#)) and subsequent publication will be the Statutory Instrument against which a permit review will be undertaken.

Due to the upcoming Welsh Senedd and Scottish Parliament elections in Spring 2026, there is limited time for ministerial advice, consultation, and sign-off, making it likely that publication of the *Best Available Techniques (BAT) Reference Document for Ferrous Metal Processing – Forming* will be delayed until Autumn 2026.

Other Matters

It has been identified that the registered address of the permit holding company is recorded incorrectly on the environmental permit. The operator is required to submit an administrative permit variation application as soon as practicable to redress this error.

[END]

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(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 can 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.