

Compliance Assessment Report CAR_NRW0051993

Permit being assessed: BX9471IU.

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

At: Trostre Works, Trostre, Llanelli, Carmarthenshire, SA14 9SD.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 18/06/2026.

Parts of permit assessed: 1. General Management, 3 Emissions and Monitoring..

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

Report sent to: Tata Steel UK Limited, Engineering Manager – Compliance, Environmental and Process Safety Departments, on 18/06/2026.

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	C2 Significant	1.1.1
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	31

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	Action REF CAR_NRW0051993.1- TSUK must review and update as necessary, its planned preventative maintenance plans for the effluent flume and inspection scheduling. Review findings are to be shared with NRW.	10/07/2026
IR3A(3)	Action REF CAR_NRW0051993.2 - TSUK to clarify the basis of their impact assessment conclusions, including details of baseline data used for comparisons following the flume leak	10/07/2026

Criteria	Action needed	Complete by
	incident.	

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

This Compliance Assessment Report (CAR) summarises Natural Resources Wales' (NRW's) assessment of further information provided following the flume leak identified on 2 March 2026 at Tata Steel Trostre Works, Llanelli. NRW's preliminary assessment of this flume leak incident has already been captured in compliance report CAR_NRW0051021.

Documents considered as part of this assessment:

- Trostre CAR response - CAR_NRW0051021 - Revision 4.
- Sample analysis from surface water and soil samples which were taken from the surrounding area of the recent flume leak - 26-06488.xlsx.
- Surface water and soil location map.
- Salus 060841 - Leak in Flume - incident report.
- 10684 Flume Trough Repair Near CAPL Junction Report -Krane Engineering Repair Report.
- March 2026 borehole sample results 26-05681.xlsx.
- Trostre surface water results - Tata labs.pdf - Harbourside results.

This CAR also summarises the progress made on actions set following the March 2026 incident in NRW's compliance report CAR_NRW0051021, in addition to a brief summary of the status of longer standing action set in earlier compliance reports, primarily CAR_NRW0050376.

NRW's assessment

TSUK took prompt action to stop and prevent the unauthorised release of contaminated effluent from the flume leak identified in March 2026. Following the incident, NRW set a number of actions for TSUK. A summary is provided below, including the actions set, TSUK's responses, and NRW's comments/action status.

Action REF CAR_NRW0051021.1– TSUK to provide all sample results following the flume leak incident. This includes water, groundwater and soil samples - TSUK have submitted sample data results to NRW. Action complete; however, please see the following additional comments.

The data has been reviewed with support from NRW's Geoscience Team. Please see the comments below:

Soils (soil sample results 26-06488.xlsx):

- An assessment of the determinant concentrations does not show a strong pattern or correlation of highest concentrations within these locations except for Manganese, Nickel and TPH.
- Whilst concentrations of Chromium and Copper are elevated and pH is notably acidic at G4, the concentrations of the metals at G1 and G2 (directly south of the incident location) are much lower and the pH is alkaline.
- The presence of TPH at G4 is most indicative of the incident impacts as that was not detected at any other soil sample locations.
- We advise TSUK to consider the ground conditions within the spill location and likely pathways, direction of flow. NRW does not have this information. This work stream may form part of the wider ground condition work proposed by TSUK (with assistance from Geotechnology) following the previous flume leak incident in February 2025.

A comparison of the soil sample results (for G1,2 and 4 only) with the 2004 SCR baseline demonstrates that soils have deteriorated with regards to Chromium, Copper, Mercury, and Zinc (no baseline for Manganese from 2004 so this may need to be compared to data from 2018-2023). Although deterioration is demonstrated, it remains unclear whether it is directly related to the March 2026 incident. TSUK must consider appropriate remediation.

Surface Water (surface water results 26-06488.xlsx):

- An assessment of the determinant concentrations does not show a strong pattern or correlation of highest concentrations within these locations except for Iron and Manganese. Note however that the highest concentrations of determinants are shown at W4 which is to the West of the spill location.
- The presence of and highest concentrations of TPH being detected at W1 is most indicative of the incident impacts however it was also detected at W2 and W3.
- PAHs have been detected at W5 only.
- We advise TSUK to consider the ground conditions within the spill location, likely pathways, direction of flow and possible chemical reactions when interpreting these results. NRW does not have this information. This work stream may form part of the wider ground condition work proposed by TSUK (with assistance from Geotechnology) following the previous flume leak incident in February 2025.

Soil and surface water samples (**26-06488.xlsx**) were dated 16/03/2026, 2 weeks after the incident. As a result, the findings may not fully represent the peak extent of the incident's impact. TSUK also provided analytical results from samples taken on 04/03/2026 from standing liquid and the flume (**Trostre surface water results – Tata labs.pdf – Harbourside results**). These initial samples were analysed by TSUK's internal laboratory (Harbourside). Samples 1-3 were taken from the standing liquid around the flume while sample 4 was taken from the flume itself. No comparison or interpretation of the results has been provided by the operator. In general, contaminant concentrations from the flume are elevated in comparison to surface water results from both the 04/03/2026 and 16/03/2026. Surface water results from 04/03/2026 are, in some cases, an order of magnitude higher

than those taken on the 16/03/2026. This variation is likely attributable to differences in sampling location and timing. Note, some metals are elevated in the 04/03/2026 results in comparison to the flume results. This may be due to oxygenation and or addition of organics for example. It is recommended that TSUK undertake interpretation and evaluation of laboratory results prior to submission in future.

Groundwater (March 2026 borehole sample results 26-05681.xlsx):

- Results from nearby existing boreholes (BHC and LBH2) were compared against BH7 2004 baseline which is up-gradient of the spill location.
- Data indicates some evidence of contaminant degradation down-gradient of the spill location, particularly for boron and iron. However, it remains difficult to determine the extent and magnitude of impacts attributable to this specific incident and historic contamination is also likely to be a contributing factor.

As concluded for the previous flume leak incident, improvements to the flumes structure and integrity is important as well as improvements to planned preventative maintenance/inspections. TSUK is to review and assess the need for more frequent flume PPM and inspections.

TSUK must consider and develop an improved understanding of the ground conditions, likely pathways, direction of flow etc as well as impacts of drainage to the surface water features surrounding and leaving the site. There is ongoing work for TSUK to undertake additional ground investigation to understand the wider ground condition which will in turn help inform secondary containment solutions for the effluent flume and ETP assets. An action is also on TSUK to prepare an accurate and up to date drainage plan for the site, including the surface water features in and around the site. Therefore no further actions will be set and the current actions must be completed as soon as possible.

Action REF CAR_NRW0051021.2 – TSUK must produce an up-to-date and accurate site drainage plan(s). This plan(s) must identify all process effluent and surface-water drainage systems both within the site and along the site boundary. It must also clearly show all nearby sensitive environmental receptors, especially those to which site drainage is discharged, or could potentially be discharged.

TSUK have confirmed a third party contractor is being sought to undertake a drain survey, however due to procurement related issues, the actioning of this purchase order has been delayed. TSUK have indicated this will be undertaken as soon as possible.

NRW reiterates the importance of completing this action promptly. 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. Access to accurate plans underpin the operator's risk assessment and emergency response. TSUK must fully understand the impacts of drainage to the surface water ditch/marsh land areas surrounding the site (understand impacts loss of containment).

Action overdue

Action REF CAR_NRW0051021.3 – TSUK must provide the investigation report for the flume leak incident, including a full root cause analysis. The report must detail the impacts of the incident, particularly any effects on groundwater, nearby surface water features, and other sensitive receptors (using the collected and analysed sample results). It must also identify and describe any proposed remediation measures.

A root cause investigation has been carried out by TSUK (*Salus 060841 – leak in flume – incident report* provided). The root cause investigation report details the following key points:

- Defective infrastructure - The flume is an ageing asset where there has been a deterioration in the flume wall and chemical brickwork.
- Inadequate maintenance – TSUK confirmed no obvious work, or impacts would have caused the crack in the structure. However, this particular area of flume had not been deep cleaned or structurally inspected for several years.

The lack of maintenance of an ageing flume resulting in another flume failure, in addition to historic failures, has been assessed as a non-compliance with permit condition 1.1.1. A non-compliance score of C2 (potential significant) has been attributed to this permit contravention against sub-criteria IR1A.

Action REF CAR_NRW0051993.1- TSUK must review and update (as necessary), its planned preventative maintenance plans for the effluent flume and inspection scheduling. Review findings are to be shared with NRW.

- Impact summary - Results reviewed (for ground and water from the surrounding area) by TSUK central experts have concluded no concerns and that no further action is required. Borehole samples from wells in close proximity of the leak area were also sampled post repair, again no concerns or further action required. However, it is unclear what data TSUK have used to compare against and TSUK's findings are in contrast to NRW's findings, see NRW's comments above; deterioration has been identified.

Action REF CAR_NRW0051993.2 - TSUK to clarify the basis of their impact assessment conclusions, including details of baseline data used for comparisons following the flume leak incident.

Action in progress

Action REF CAR_NRW0051021.4 – TSUK to provide a summary of the flume inspection and repair work carried out. TSUK must provide evidence of the repair work undertaken and any further findings from the proposed thermal drone survey to be carried out post repair work.

Third party contractor “Krane Engineering” completed the inspection and repair work. TSUK requested an additional thermal survey to be completed for the leak area and are

awaiting a date to be confirmed by third party contractor for this to be carried out.

Action partially complete - thermal survey remains outstanding

Action REF CAR_NRW0051021.5 TSUK is requested to urgently confirm whether drawing T2604 – Storm Drain, which appears to show at least six potentially unauthorised release points (e.g., emissions to the marsh, emergency overflow pipe), is accurate.

As per Action REF CAR_NRW0051021.2, TSUK have confirmed a third party contractor to being sought to undertake a drain survey, however due to procurement related issues, the actioning of this purchase order has been delayed. TSUK have indicated this will be undertaken as soon as possible.

Action overdue

Action summary for previous CARs - CAR NRW0050376

Documents submitted in response to actions set in CAR-NRW0050376:

- Trostre CAR response - CAR_NRW0050376 - Revision 3.
- ECL factual & interpretive report Feb 26 - further commentary on this report will be provided separately.
- Drawing T2604 – Site wide storm drainage system.
- Drawing T2323 – Plan view site layout of the Effluent Treatment Plant.
- Trostre flume maintenance summary report for 2025.
- Trostre borehole sampling procedure.
- Veolia - Trostre Asset Assessment Report full Version (1)-compressed.
- A large number of documents provided in relation to action 11 were provided - oily effluent tank information, ETP tank farm information and further inspection and maintenance documentation was provided. Given the number of documents, a complete list has not been given recorded here.

Summary:

- **Action ref CAR_NRW0050376.1 – 12 monthly groundwater sampling – Ongoing.**
- **Action ref CAR_NRW0050376.2 – groundwater sampling procedure – NRW feedback comments to TSUK and updates are required. TSUK to provide an update/revised sampling procedure document asap.**
- **Action ref CAR_NRW0050376.3 – Additional ground investigation work, secondary containment solution – Update provided, further ground investigation work proposed which will help inform containment solution – Ongoing.**
- **Action ref CAR_NRW0050376.4 – updated drainage plans, new action set in CAR_NRW0051021 as drainage plan provided is not believed to be accurate and there is no clear identification of nearby sensitive environmental receptors. Therefore, this action is superseded.**
- **Action ref CAR_NRW0050376.5 - Additional ground investigation work, secondary**

containment solution – as per action 3 – **Ongoing.**

- **Action ref CAR_NRW0050376.6** – Provide SAP/Concept output for recently inspected flume –Maintenance summary report provided - **Complete.**
- **Action ref CAR_NRW0050376.7** – IBC containment improvements – **Complete.**
- **Action ref CAR_NRW0050376.8** – ETP tanker pumping operations and improvement to containment measures – **Ongoing – Further update from TSUK required.**
- **Action ref CAR_NRW0050376.9** – Provide access points to surface water streams at ETP boundary - **Ongoing – Further update from TSUK required.**
- **Action ref CAR_NRW0050376.10** – Confirmation of operational pipework – **Complete.**
- **Action ref CAR_NRW0050376.11** – copies of documentation, in service minor inspection reports for waste oily effluent tanks etc. TSUK have provided several documents in relation to this action. However, TSUK confirmed that they are currently unable to provide a number of inspection reports, mitigation plans and asset evaluation outputs at this time. Both TSUK and Veolia recognise that there are gaps in the available asset condition information and supporting documentation for the Effluent Treatment Plant infrastructure. TSUK confirmed a full review of the Effluent Treatment Plant assets, inspection regime and reporting arrangements is currently in progress to address these gaps and to ensure that the position is fully understood and robustly documented. TSUK are unable to provide any internal (out of service) inspection reports for either of the two Oily Effluent Tanks, therefore their plan is to complete an out of service inspections within the next 6 months. The roofs on both tanks will be replaced within the next 4 months. This CAR action is now being progressed separately under the COMAH regime. A separate COMAH response will be issued in due course.
- **Action ref CAR_NRW0050376.12** – Updated plan of ETP and tanks farm – **Clarity required as per the comments in CAR_NRW0051021.**

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
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.