

## Compliance Assessment Report

Report ID:  
CAR\_NRW0034620

This form will report compliance with your permit as determined by an NRW officer

|                              |                                           |             |            |     |     |
|------------------------------|-------------------------------------------|-------------|------------|-----|-----|
| Site                         | Port Talbot Steel Works                   | Permit Ref  | BL7108IM   |     |     |
| Operator/Permit holder       | Tata Steel UK Limited                     |             |            |     |     |
| Regime                       | Installations                             |             |            |     |     |
| Date of assessment           | 30/09/2019                                | Time in     | N/A        | Out | N/A |
| Assessment type              | Check Monitoring/Sampling                 |             |            |     |     |
| Parts of the permit assessed | 3 Emissions and Monitoring; 4 Information |             |            |     |     |
| Lead officer's name          | Cowie, Douglas                            |             |            |     |     |
| Accompanied by               |                                           |             |            |     |     |
| Recipient's name/position    | Claire Grainger/ Environment Manager      | Date issued | 03/02/2020 |     |     |

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

| Permit conditions and compliance summary                                                                       | CCS Category | Condition(s) breached    |
|----------------------------------------------------------------------------------------------------------------|--------------|--------------------------|
| A1 - Specified by permit                                                                                       | A            |                          |
| C2 - General Management - Management system and operating procedures                                           | A            |                          |
| E1 - Emissions - Air                                                                                           | C3           | 3.1.2 Emissions to air   |
|                                                                                                                | C4           | 3.1.2 Emissions to air   |
| E3 - Emissions - Surface water                                                                                 | C3           | 3.1.2 Emissions to water |
| G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment               | A            |                          |
| G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events        | A            |                          |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | A            |                          |

**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.

**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,  
**O** = Ongoing non-compliance, not scored.

|                                    |          |                                                                     |            |
|------------------------------------|----------|---------------------------------------------------------------------|------------|
| <b>Number of breaches recorded</b> | <b>3</b> | <b>Total compliance score</b><br>(see section 5 for scoring scheme) | <b>8.1</b> |
|------------------------------------|----------|---------------------------------------------------------------------|------------|

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

### Purpose of visit/assessment

Condition 3.1.2 of Tata Steel's permit requires that the limits given in Schedule 3 of the permit (point source emissions) shall not be exceeded.

Section 4 of Tata Steel's permit contains several conditions in respect of notifications, including notifying breaches of permit conditions and/or emission limits to the regulator.

Schedule 5 of the permit outlines the information that the operator must provide when notifying the regulator and is divided into Part A and Part B. The schedule provides a framework/template for informing and/or notifying NRW in accordance with the requirements of permit condition 4.3.1.

The following operator notifications have been received concerning breaches/exceedances, incidents or accidents which occurred or were notified to us during **Quarter 3 2019** (1 July – 30 September):

| QUARTER 3 (July - September) 2019 |               |                      |                |                             |                                |                                                           |                               |                        |                                                                                                                    |                                   |
|-----------------------------------|---------------|----------------------|----------------|-----------------------------|--------------------------------|-----------------------------------------------------------|-------------------------------|------------------------|--------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Notification reference            | Date of event | Date of notification | Emission point | Parameter                   | Source                         | Emission limit (including unit)                           | Reference period              | Monitoring frequency   | Reported result(s)                                                                                                 | Measurement uncertainty           |
| \$5N/19/33                        | 08-Jul-19     | 19-Jul-19            | A55            | Visible Smoke (obscuration) | Morfa Main Stack               | Ringelmann 1 (20% obscuration taking into account 95% CI) | Weekly mean                   | 30mins in any day      | 25.96%                                                                                                             | Not defined; inherent uncertainty |
| \$5N/19/34                        | 13-Apr-19     | 23-Jul-19            | W1             | Total Inorganic Nitrogen    | Long Sea Outfall               | 50.00mg/l                                                 | Average from 7 x 24hr samples | Weekly                 | 62.94mg/l<br>55.49mg/l                                                                                             | +/- 0.1mg/l                       |
| \$5N/19/35                        | 23-Jul-19     | 25-Jul-19            | A5A            | N/A                         | BF5 Bleeder Valves             | No limit applies                                          | N/A                           | N/A                    | (see below)                                                                                                        | N/A                               |
| \$5N/19/36                        | 24-Jul-19     | 26-Jul-19            | A2             | Particulate Matter          | Sinter Plant Secondary De-Dust | 50.00mg/m3                                                | Daily mean                    | Continuous measurement | 54.54mg/m3                                                                                                         | +/- 30%                           |
| \$5N/19/37                        | 31-Jul-19     | 05-Aug-19            | A1             | Particulate Matter          | Sinter Plant Main Stack        | 40.00mg/m3                                                | Daily mean                    | Continuous measurement | (see below)                                                                                                        | +/- 30%                           |
| \$5N/19/38                        | 18-Aug-19     | 19-Aug-19            | A5A            | N/A                         | BF5 Bleeder Valves             | No limit applies                                          | N/A                           | N/A                    | (see below)                                                                                                        | N/A                               |
| \$5N/19/39                        | 19-Aug-19     | 20-Aug-19            | A2             | Particulate Matter          | Sinter Plant Secondary De-Dust | 50.00mg/m3                                                | Weekly mean                   | Continuous measurement | 59.96mg/m3                                                                                                         | +/- 30%                           |
| \$5N/19/40                        | 20-Aug-19     | 23-Aug-19            | A2             | Particulate Matter          | Sinter Plant Secondary De-Dust | 50.00mg/m3                                                | Daily mean                    | Continuous measurement | 50.52mg/m3                                                                                                         | +/- 30%                           |
| \$5N/19/41                        | 31-Aug-19     | 10-Sep-19            | A1             | Particulate Matter          | Sinter Plant Main Stack        | 40.00mg/m3                                                | Daily mean                    | Continuous measurement | (see below)                                                                                                        | +/- 30%                           |
| \$5N/19/42                        | 07-Sep-19     | 10-Sep-19            | A55            | Visible Smoke (obscuration) | Morfa Main Stack               | Ringelmann 1 (20% obscuration taking into account 95% CI) | Weekly mean                   | 30mins in any day      | 25.47%                                                                                                             | Not defined; inherent uncertainty |
| \$5N/19/43                        | 28-Jul-19     | 10-Sep-19            | W1             | Total Inorganic Nitrogen    | Long Sea Outfall               | 50.00mg/l                                                 | Average from 7 x 24hr samples | Weekly                 | 105.17mg/l<br>107.8mg/l<br>86.72mg/l<br>66.10mg/l<br>91.38mg/l<br>96.03mg/l<br>94.36mg/l<br>86.01mg/l<br>64.48mg/l | +/- 0.1mg/l                       |
| \$5N/19/44                        | 18-Sep-19     | 19-Sep-19            | A16            | Particulate Matter          | BOS Secondary FEP South        | 15.00mg/m3                                                | Average from 7 x 24hr samples | Continuous measurement | 19.04mg/m3<br>16.50mg/m3                                                                                           | +/- 30%                           |
| \$5N/19/46                        | 30-Sep-19     | 04-Oct-19            | A1             | Particulate Matter          | Sinter Plant Main Stack        | 40.00mg/m3                                                | Daily mean                    | Continuous measurement | (see below)                                                                                                        | +/- 30%                           |

## Compliance assessment

### A1: SINTER PLANT MAIN STACK

**\$5N/19/37:** Schedule 5 Part A received 05/08/19 (by email)

Multiple notifiable breaches of the permitted limit for particulates in July 2019

**\$5N/19/41:** Schedule 5 Part A received 10/09/19 (by email)

Multiple notifiable breaches of the permitted limit for particulates in August 2019

**\$5N/19/46:** Schedule 5 Part A received 04/10/19 (by email)

Multiple notifiable breaches of the permitted limit for particulates in September 2019

### A1: Sinter plant main stack

**Permitted emission limit value (ELV) is 40.00mg/m3 as a daily mean (+/- 30%)**

**Schedule 5 Part A operator comment:**

Reg 61 in place

## Schedule 5 Part B operator comment:

As a result of the Regulation 61 being served on Tata Steel a comprehensive project has been put in place and regular meetings are held with the NRW providing a detailed update on progress to plan.

Please see a copy of the plan attached to this notification covering 2019 Q3 (July, August, September 2019)

| Updated November 7th 2019                                       |                                                                                                                                                                                                                                                                                                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                  |                      |                  |                  |
|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|----------------------|------------------|------------------|
| Description                                                     | Regulation 61B Update                                                                                                                                                                                                                                                                                      | % Complete | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Process Owner                                                    | Responsible Engineer | Start            | Completion Date  |
| <b>1. Reduction of Air Ingress</b>                              |                                                                                                                                                                                                                                                                                                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                  |                      |                  |                  |
| Mechanical Repairs and Sealing of Gas System to include:        |                                                                                                                                                                                                                                                                                                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                  |                      |                  |                  |
| ESP Hopper Conveyor repair / sealing                            | Planned completion Aug 2019                                                                                                                                                                                                                                                                                | 100%       | Ongoing inspection & maintenance within works area & managed by SAP (inspection routes and PM tasks during planned shutdowns)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                  |                      | Started          | 12.09.2019       |
| ESP North & South Hopper Door Sealing                           | All South Doors Replaced                                                                                                                                                                                                                                                                                   | 100%       | New doors fitted on South precip 'ind upper section of North precip. Lower doors on North repaired. Door mechanisms checked every 4 week cycle. Maintenance of door seals included within shutdown scope of work. Ongoing inspection & maintenance managed by SAP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                  |                      | Started          | 12.09.2019       |
| <b>3. Improved Instrumentation and ESP Control Optimization</b> |                                                                                                                                                                                                                                                                                                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                  |                      |                  |                  |
| North and South ESP Control Optimization                        | Control optimisation ongoing, rapping timings reduced on first three fields of both ESPs. Plan to trial power off rapping and increased rapping on last fields going forward. weekly meeting held. Project team investigating ESP Hardware, and university assisting project team with Process influences. | 100%       | Optimization complete, including power down wrapping fields 1 - 3 North & South ESP. Report issued.<br>Ongoing maintenance managed within works area team via SAP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Projects                                                         |                      | 11.06.2018       | Complete to plan |
| <b>4. Waste Gas System Maintenance Strategy</b>                 |                                                                                                                                                                                                                                                                                                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                  |                      |                  |                  |
| Double Dome Valve Improved Maintenance Strategy Implementation  | 950 DDV Changed 27.3.17, 12.11.17, 12.10.18                                                                                                                                                                                                                                                                | 100%       | Completed Sept 2019,<br>Daily management & maintenance strategy ongoing and managed by works area using SAP<br>Next outage every 4 weeks 18hrs<br>Next planned quarterly outage Jan 2020 (provisional and TBC)<br>2 improvement actions identified in meeting 3/10/19 :-<br>1. Review feasibility of installing trace heating around DDV's to minimize effects of condensation inside drop legs<br>2. Spares tracker to be generated to ensure robust monitor on DDV overhauls.<br>Owner for each of the above two actions to be identified<br>Projects dept have previously scoped and price trace heating on precip hoppers and DDV's. Info to be forwarded on for review - trial on DDV suggested with a new valve installed. (to provide info). | Changed DDV/ WK18 2019                                           |                      | Complete to Plan | Complete to Plan |
|                                                                 | 951 DDV Changed 26.11.18                                                                                                                                                                                                                                                                                   |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Changed DDV/ WK22 2019                                           |                      |                  |                  |
|                                                                 | 952 DDV Changed Top Dome 10.11.2017<br>Changed FT Domes 12.7.18 DDV Changed 7.2.19                                                                                                                                                                                                                         |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Changed DDV/ Due WK6 2019                                        |                      |                  |                  |
|                                                                 | 953 DDV Changed FT Domes 20.11.17<br>change Valve 26.02.2019                                                                                                                                                                                                                                               |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Changed DDV/ 26.02.2019                                          |                      |                  |                  |
|                                                                 | Changed Set 26.02.2019                                                                                                                                                                                                                                                                                     |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Changed Wk 20                                                    |                      |                  |                  |
|                                                                 | 1047 DDV Changed 24.11.16, 20.05.2019 Changed FT Domes 22.3.18 Changed Top Dome 13.7.18                                                                                                                                                                                                                    |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1047 Domes fitted in 1048 with new seals to overhaul existing.   |                      |                  |                  |
|                                                                 | 1048 DDV Changed 20.12.18, 28.10.17, 11.1.18. Changed FT Domes 15.2.18. Next change planned week 26 2019                                                                                                                                                                                                   |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Changed Wk 20 Installation of intermediate Hopper complete wk 20 |                      |                  |                  |
|                                                                 | 1049 DDV Changed 20.05.2019 FT Domes 3.4.19                                                                                                                                                                                                                                                                |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                  |                      |                  |                  |

|                                                                                                                                                                                                                                                                         |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------------------|
| North and South ESP Improved Maintenance Strategy Implementation                                                                                                                                                                                                        | Next quarterly maintenance scheduled for Jan 2020.                                                                                      | 100% | Next Quarterly maintenance scheduled for Jan 2020, ongoing maintenance strategy managed by works area using SAP. Options of full plant outage vs 2x single fan periods to be reviewed in conjunction with timescales/costs associated with installation of positive isolation facilities - tenders submitted for same, due back mid/end October.<br><br>Field 4B on south precep out of service since week 39/40 shutdown. To be addressed in wk47 shutdown.<br>Frequency of inspection requires review to determine optimum. Present report into optimized Sinter Plant ESP cleaning and maintenance frequencies to NRW | Started  | 30.11.2019            |
|                                                                                                                                                                                                                                                                         | ACTION FROM OCTOBER CAPEX REVIEW WITH NRW.                                                                                              |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Started  | 30.11.2019            |
| 5. Reduction of the Chloride Content of the Sinter Feed Material                                                                                                                                                                                                        |                                                                                                                                         |      | Projects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |          |                       |
| Treatment of Sinter Plant ESP dusts and Blast Furnace flue dusts - trial 2                                                                                                                                                                                              | Group environment developing process parameters based on trial results<br>[redacted] samples sent, awaiting proposals from suppliers... | 80%  | Trial started 23rd Aug 2019, for 3 months. Trial report due 31/12/19. UREA addition offline from 1st October - scheduled for 1 month in total, being monitored                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Projects | 12.11.2018 01.09.2021 |
|                                                                                                                                                                                                                                                                         | ACTION FROM OCTOBER CAPEX REVIEW WITH NRW.                                                                                              |      | Tata Steel to communicate the chloride trial outcomes in writing to NRW (within 4 weeks of trial completion)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Projects | 31.12.19              |
| Comment - to trial at near-full scale and develop data and specifications for full scale implementation - to trial the use of the washed materials on laboratory and full-scale sinter plant trials - to investigate the role of urea addition upon waste gas plume vis |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |                       |
| 6. Subject to outcomes of trial and feasibility study: Full Scale Plant - CAPEX Scheme                                                                                                                                                                                  |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |                       |
| Definition                                                                                                                                                                                                                                                              | Resource risk, TCE engineer now recruited.                                                                                              | 80%  | On hold until 31/3/20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Projects |                       |
| Full Scale Plant CAPEX Submission and approval                                                                                                                                                                                                                          |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |                       |
| Implementation of project                                                                                                                                                                                                                                               |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          | 31.03.2021            |
| Commissioning and optimisation                                                                                                                                                                                                                                          |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          | 01.04.2021 30.06.2021 |
| Implementation of scheme and preparation of materials                                                                                                                                                                                                                   |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          | 01.07.2021 01.09.2021 |
| 7. Compliance With Emission Limit Value                                                                                                                                                                                                                                 |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |                       |
| In the event that the Revert Washing scheme is not viable, alternative options to include fabric bag filter systems will be evaluated, an option selected, developed and installed.                                                                                     | On Hold                                                                                                                                 |      | Working with [redacted] to investigate bypass bag filter and end of trial solutions. Potential for weathering BFFD if levels return. Currently running at 0.4% BFFD in sinter blend and emissions averaging 46mg/m3 (May 2019)                                                                                                                                                                                                                                                                                                                                                                                           |          | 01.09.2021            |
| GENERAL                                                                                                                                                                                                                                                                 |                                                                                                                                         |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |                       |
| In light of completion of actions relating to Regulation 61 (as shown above), summary document would be beneficial to underline all benefits and improvements realized.                                                                                                 | ACTION FROM OCTOBER CAPEX REVIEW WITH NRW.                                                                                              |      | Submit report summarising the work undertaken in order to comply with the actions set out in response to Regulation 61 Notices issued on the 18th July 2019 by NRW.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |          | 31.12.2019            |

NRW has agreed to accept a monthly written Schedule 5 notification from Tata in the event of continued breaches of the particulate daily mean ELV at A1.

After applying the appropriate measurement uncertainty factor, the following exceedance recorded at A1 and notified within **S5N/19/37** remains non-compliant with the permitted limit and Condition 3.1.2:

09/07/2019: 77.01mg/m<sup>3</sup>

**One CCS Category 3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this emission limit during Quarter 3 2019 under a single CCS3 score for **S5N/19/37** confirmed above, in line with our Compliance Classification Scheme [CCS]. The consolidated notifications are listed below:

**S5N/19/41** received on 10/09/19

**S5N/19/46** received on 04/10/19

#### Sinter Plant improvement plan

Tata Steel has submitted an improvement plan in response to an EPR Regulation 61 (Statutory) Information Notice issued by NRW. This plan outlines the steps Tata Steel will take to achieve compliance with the relevant ELV for particulates at emission point A1. NRW can suspend CCS scores while an operator is working towards compliance (see Principle 5 and Annex 4 of our Compliance Classification Scheme [CCS] (version 3, 26 March 2013).

Previously we agreed to suspend compliance scores for particulates ELV breaches at emission point A1 - see **CAR\_NRW0033268**, **CAR\_NRW0034618** & **CAR\_NRW0034619**.

CCS scores can only be suspended for a maximum of six months; after this time, NRW will recommence active scoring to reflect our ongoing regulatory effort at the site (CCS Principle 5). This approach has been followed in respect of the permit breaches identified during Quarter 3 2019.

Whilst NRW must recommence active CCS scoring in response to identified ELV breaches at A1, it is also recognised that Tata Steel has improved the overall environmental performance of the sinter plant main stack abatement systems and continues to work towards sustainable compliance in accordance with its agreed improvement plan.

Should we find that progress towards compliance falters, stagnates or regresses we will review our regulatory approach to ensure Tata Steel takes all appropriate steps to ensure compliance with its Environmental Permit.

Compliance with this ELV has since been reviewed at regular intervals by NRW during 2019, and our assessments captured in relevant compliance assessment reports.

The **Summary and actions required** section of this report (below) also discusses Tata Steel's improvement plan.

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## A2: SINTER PLANT SECONDARY DE-DUST

**S5N/19/36:** Schedule 5 Part A received 26/07/2019 (by email)

Daily mean (average) for particulates recorded at emission point A2:

24/07/2019: 54.54mg/m<sup>3</sup>

**S5N/19/39:** Schedule 5 Part A received 20/08/2019 (by email)

Daily mean (average) for particulates recorded at emission point A2:

19/08/2019: 59.96mg/m<sup>3</sup>

**S5N/19/40:** Schedule 5 Part A received 23/08/2019 (by email)

Daily mean (average) for particulates recorded at emission point A2:

20/08/2019: 50.52mg/m<sup>3</sup>

### **A2: Sinter Plant Secondary De-dust**

**Permitted limit is 50.00mg/m<sup>3</sup> as a daily mean (+/- 30%)**

### **Schedule 5 Part A operator comment:**

*S5N/19/36: Investigation ongoing*

*S5N/19/39: De dust field 2 in local control and KV settings optimised on each field to manage emissions.*



*S5N/19/40: De dust field 2 in local control and KV settings optimised on each field to manage emissions. Maintenance stop planned for 22/08/19*

**Schedule 5 Part B operator comment:**

*S5N/19/36: Several small leaks found and Earth down hatch on precipitator found not sealing so sealed. Discharge sprays removed, cleaned and refitted; flow increased as well. Levels dropped*

*S5N/19/39 & S5N/19/40: Issues with De dust field 2. put into in local control to up Kv c running at 12-18kv and fields 1 and 3 running at 26-30Kv. Also sprays cleaned and optimised. This lowered the dedust readings back to permitted levels and field 2 was fixed in the week 35 stop.*

After applying the appropriate measurement uncertainty factor, these exceedances remain within the permitted limit of 50.00mg/m<sup>3</sup>. No non-compliance (CCS) scores have been applied to these events.

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**IRONMAKING**

**S5N/19/35:** Schedule 5 Part A received 25/07/2019 (by email).

Release of particulates and blast furnace gas from No.5 Blast Furnace bleeder valves (emission point A5A)

23/07/2019 23.05hrs

**A5A: Blast Furnace 5 bleeders**

**No emission limit values (ELVs) apply to emissions/releases from A5A**

**Schedule 5 Part A operator comment:**

*Gas surge resulting in bleeders opening. Snort opened to relieve pressure, bleeders closed asap.*

**Schedule 5 Part B operator comment:**

*On the 23rd July the furnace process was relatively unsettled blowing 170km<sup>3</sup>/hr total blast (low volume) with variable headroom and slight burden slips. The furnace was suffering from high top temperatures due to being limited on oxygen enrichment (oxygen supply from the BOC plant was low). The burden distribution was altered to close the centre to help reduce the top temperatures. The closing of the centre resulted in an increase in differential pressure. The burden slipped to 4.0m and furnace gas surged up the walls of the furnace short circuiting the burden and so increasing high top pressure to the point at which the bleeders opened. The north and semi-clean bleeders opened for 16 seconds.*

*The combination of having a disrupted furnace process on low blowing volume as well as making a burden distribution change to close the centre increasing differential pressure further resulted in the bleeder opening after a burden slip. In this instance the bleeders did open on 1.4 bar top pressure. To reduce the possibility of the bleeder opening when the process is unsettled the centre profile should be opened rather than closed.*

**Conclusions**

- 1. Blast Furnace 5 furnace top bleeder valves opened on 23rd July after closing the centre profile on the burden distribution while the process was unsettled.*
- 2. The furnace slipped to 4.0m as the differential pressure increased and the pressure was*

*relieved up the furnace walls increasing the top pressure to the point where the bleeders opened.*

*3. Blast Furnace 5 north and semi-clean bleeder valves functioned correctly by opening at the correct limits when the high top pressure deviated from its set-point.*

*4. The process team leader and senior operator opened the cold blast snort valve to reduce furnace pressure and close the Furnace Top bleeder valves.*

*5. The Davey cone opened in an attempt to control/relieve furnace top pressure.*

#### **Recommendations**

*1. Recover the oxygen enrichment capacity to allow an increase of oxygen to control top temperatures - Complete*

*2. Review distribution change and control of top temperatures via oxygen enrichment - Complete*

Targeted compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases.

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**S5N/19/38:** Schedule 5 Part A received 18/08/2019 (by email).

Release of particulates and blast furnace gas from No.5 Blast Furnace bleeder valves (emission point A5A)

18/08/2019 15:59hrs

#### **A5A: Blast Furnace 5 bleeders**

**No emission limit values (ELVs) apply to emissions/releases from A5A**

#### **Schedule 5 Part A operator comment:**

*Gas surge resulting in bleeders opening. @ Snort opened to relieve pressure, bleeders closed asap.*

#### **Schedule 5 Part B operator comment:**

*Blast Furnace 5 was suffering from a difficult recovery after a shutdown due to BOS Plant operational issues. The furnace returned to blast with low heat gain and a poor centre burden distribution profile and high differential pressure. The heat gain was lost due to a period of poor quality sinter resulting in a build up on the furnace walls. The burden stopped descending and was given a check. The burden then slipped to 6.2m and furnace gas surged up the walls of the furnace short circuiting the burden and so increasing high top pressure to the point at which the bleeders opened. The date and time of the bleeder opening is in the table below. The north, centre, south and semi-clean bleeders opened for 16 seconds.*

*The combination of having a 24hr unplanned furnace shutdown and poor quality sinter resulting in the loss of heat gain and centre profile so increasing differential pressure resulted in the bleeder opening.*

#### **Conclusions**

*1. Blast Furnace 5 Furnace Top bleeder valves opened on 18th August due to a difficult recovery from a 24hr unplanned shutdown and a period of poor quality sinter.*

*2. The Furnace was checked to 6.2m as the differential pressure increased and the pressure was relieved up the furnace walls increasing the top pressure to the point where the bleeders opened.*



3. *Blast Furnace 5 north, centre and south and semi-clean bleeder valves functioned correctly by opening at the correct limits when the high top pressure deviated from its set-point.*
4. *The process team leader and senior operator opened the cold blast snort valve to reduce furnace pressure and close the furnace top bleeder valves.*
5. *The Davey Cone opened in an attempt to control/relieve furnace top pressure.*

#### *Recommendations*

1. *Review the blast furnace checking procedure to ensure checking the furnace on time to avoid larger slips – Complete*
2. *Review burden distribution to activate heat gain and to reduce differential pressure – Complete*

Targeted compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases.

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### BASIC OXYGEN STEELMAKING (BOS) PLANT

**S5N/19/44:** Schedule 5 Part A received 19/09/2019 (by email).

Daily mean (average) for particulates recorded at emission point A16:

17/09/2018: 19.04mg/m<sup>3</sup>

18/09/2018: 16.50mg/m<sup>3</sup>

#### **A16: BOS Plant Secondary FEP South**

**Permitted limit is 15.00mg/m<sup>3</sup> as a daily mean (+/- 30%)**

#### **Schedule 5 Part A operator comment:**

*Investigations ongoing.*

#### **Schedule 5 Part B operator comment:**

*During the afternoon of the 17th of September, the emitted gases from Secondary Fume Stack South (A16) breached the permitted limit of 15mg/m<sup>3</sup>.*

- *Chamber 4 was isolated to lower the density of dust particles that were emitted to atmosphere.*
- *Engineering investigated the bag plant and found that filter bags required renewal.*
- *Following isolation of the problem chamber, dust emissions were reduced to an acceptable level as shown on compliance live.*
- *Fast turnaround by engineering in carrying out maintenance to address the breach.*
- *Fan 6 FEP had extensive planned maintenance between 23.09.19 - 04.10.19 after which it was brought back to operational service.*

After applying the appropriate measurement uncertainty factor, these exceedances remain within the permitted limit of 15.00mg/m<sup>3</sup>. No non-compliance (CCS) scores have been applied to these events.

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## SURFACE WATERS

**S5N/19/34:** Schedule 5 Part A received 23/07/2019 (by email)

Weekly average for total inorganic nitrogen recorded at emission point W1:

31/03/2019 – 06/04/2019: 62.94mg/l

07/04/2019 – 13/04/2019: 55.49mg/l

### **W1: Long Sea Outfall**

**Permitted limit for discharge is 50.00mg/litre**

The operator has specified that the following measurement uncertainty factors for the constituent compounds of total inorganic nitrogen are associated with the reported results:

| Substance      | Uncertainty (+/-) |
|----------------|-------------------|
| Nitrate (NO-3) | 0.1mg/l           |
| Nitrite (NO-2) | 0.05mg/l          |
| Ammonia (NH3)  | 0.056mg/l         |

We have applied the uncertainty factor for nitrate (NO-3) to the measured results. The proportions of [ammonia to nitrite to nitrate] within the effluent generated by Tata Steel and discharged at W1 are not known. The on-site effluent treatment plant utilises biological treatment, therefore it is assumed that nitrification of ammonia has already taken place before treated effluent is discharged at W1. Therefore, we have used the compound with the widest uncertainty factor (NO-3) and which is the most likely to be present in the treated effluent because of nitrification.

### **Schedule 5 Part A operator comment:**

*Reported weekly averages since elevated week have been within permitted limit. Source of exceedance is under investigation.*

### **Schedule 5 Part B operator comment:**

*During the period Q4 2017 to Q4 2018, a number of Part A notifications were submitted for breaches of the weekly average ammonia, nitrite and nitrate limit at W1 Long Sea Outfall.*

*Issues around ammonia incinerator and ammonia still stability during this period led to increased ammonia, nitrate and nitrite (A+N+N) concentrations in treated wastewater.*

*The weekly averages of daily composite samples for W1 Long Sea Outfall w/c 31 March and w/c 7 April 2019 were 62.94 mg/l and 55.49 mg/l respectively, above the A+N+N limit of 50 mg/l.*

*The improvements made to the By-products Plant during Q4 2017 have required a period of process optimisation.*

*The stability of both the incinerators and stills has improved since the upgrade and we are now seeing improvement through less prolonged periods of elevated A+N+N at the LSO and lower average concentrations.*

*Further improvements to the control and optimisation of the still and the operation of the BET plant were made during Q2 2019 and, to date, have reduced the loading of total nitrogen in the*

*final effluent discharged from W1 Long Sea Outfall.*

After applying the appropriate measurement uncertainty factor, the exceedances recorded at W1 during Quarter 2 2019 and notified within **S5N/19/34** remain non-compliant with the permitted limit and Condition 3.1.2.

We have previously consolidated notified exceedances at W1 during Quarter 2 2019 under a single CCS3 score for **S5N/19/30** confirmed in **CAR\_NRW0034619**, in line with our Compliance Classification Scheme [CCS].

We are concerned about the length of time it has taken to detect and notify these permit breaches to the regulator. The **Summary and actions required** section of this report (below) discusses this issue.

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**S5N/19/43:** Schedule 5 Part A received 10/09/2019 (by email)

Weekly average for total inorganic nitrogen recorded at emission point W1:

02/06/2019 – 08/06/2019: 105.17mg/l

09/06/2019 – 15/06/2019: 107.80mg/l

16/06/2019 – 22/06/2019: 86.72mg/l

23/06/2019 – 29/06/2019: 66.10mg/l

30/06/2019 – 06/07/2019: 91.38mg/l

07/07/2019 – 13/07/2019: 96.03mg/l

14/07/2019 – 20/07/2019: 94.36mg/l

21/07/2019 – 27/07/2019: 86.01mg/l

28/07/2019 – 29/07/2019: 64.48mg/l

### **W1: Long Sea Outfall**

#### **Permitted limit for discharge is 50.00mg/litre**

The operator has specified that the following measurement uncertainty factors for the constituent compounds of total inorganic nitrogen are associated with the reported results:

| Substance      | Uncertainty (+/-) |
|----------------|-------------------|
| Nitrate (NO-3) | 0.1mg/l           |
| Nitrite (NO-2) | 0.05mg/l          |
| Ammonia (NH3)  | 0.056mg/l         |

We have applied the uncertainty factor for nitrate (NO-3) to the measured results. The proportions of [ammonia to nitrite to nitrate] within the effluent generated by Tata Steel and discharged at W1 are not known. The on-site effluent treatment plant utilises biological treatment, therefore it is assumed that nitrification of ammonia has already taken place before treated effluent is discharged at W1. Therefore, we have used the compound with the widest uncertainty factor (NO-3) and which is the most likely to be present in the treated effluent because of nitrification.

#### **Schedule 5 Part A operator comment:**

Source of exceedance has been investigated and is outlined in accompanying Part B notification.

#### **Schedule 5 Part B operator comment:**

During June, July and August 2019, nine weekly composite samples for W1 Long Sea Outfall were reported to be above the ammonia, nitrite and nitrate (A+N+N) limit of 50 mg/l:

w/c 2 June 2019 – 105.17 mg/l  
w/c 9 June 2019 – 107.8 mg/l  
w/c 16 June 2019 – 86.72 mg/l  
w/c 23 June 2019 – 66.10 mg/l  
w/c 30 June 2019 – 91.38 mg/l  
w/c 7 July 2019 – 96.03 mg/l  
w/c 14 July 2019 – 94.36 mg/l  
w/c 21 July 2019 – 86.01 mg/l  
w/c 28 July 2019 – 64.48 mg/l

Root cause was in-combination effect of downtime on Byproducts Plant ammonia incinerators. Further detailed context is given below.

A few exceedances of the A+N+N limit during 2017 prompted Tata to examine root causes with Group Environment support.

The conclusion of the review was that the Biological Effluent Treatment (BET) plant required some improvements to bring up to standard, including inoculation with *Pseudomonas* to restore the denitrifying biological component of the treatment. However, an excess of strong liquor coming from Byproducts Plant required action upstream of BET plant in advance of inoculation with *Pseudomonas*, or the microbes would not cope with the high range, 'uneven' liquor strength.

#### **Byproducts Plant Improvement Work**

Between April and July, we have undertaken the following works:

- repairs on No. 3 ammonia incinerator, including replacing combustion, dilution and quench fans
- cleaning reflux separator chamber and lines
- cleaning of dephlegmator
- steaming of ammonia still
- removed stack lining material from incinerator exhaust ducts, reducing back pressure on fans

#### **Breaches**

The in-combination effect of the downtime on the incinerators due to the improvement work led to an unexpected and prolonged exceedance of the permit limit.

Throughout this period, the ammonia levels in the Long Sea Outfall samples did not indicate any issues. It was only when the monthly batch tests of nitrite and nitrate were completed that we detected the breaches.

#### **Remedy**

The key work on the Byproducts Plant is complete. This will reduce the total load of ammonia going to the BET plant. Once we have observed a sufficient period of stable liquor output, we will focus our attention on resetting the BET plant, including inoculation with *Pseudomonas*, to complete the process. A further improvement, starting in mid-September, will be the moving of the testing for nitrite and nitrate to the Analytical labs. Instead of batch processing, this will give us daily sight of the total nitrogen and allow us and the MCO to react to elevated levels quicker.

Exceedances within this notification which occurred during Quarter 2 2019 have already been consolidated under a single CCS3 score for **S5N/19/30** confirmed in **CAR\_NRW0034619**, in line with our Compliance Classification Scheme [CCS].

After applying the appropriate measurement uncertainty factor, the following exceedance recorded at W1 during Quarter 3 2019 and notified within **S5N/19/43** remains non-compliant with the permitted limit and Condition 3.1.2:

30/06/2019 – 06/07/2019: 91.38mg/l

**One CCS Category 3 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this emission limit during Quarter 3 2019 under a single CCS3 score for **S5N/19/43** confirmed above, in line with our Compliance Classification Scheme [CCS].

We are concerned about the length of time it has taken to detect and notify these permit breaches to the regulator. The **Summary and actions required** section of this report (below) discusses this issue.

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## COKE OVENS

**S5N/19/33:** Schedule 5 Part A received 19/07/2019 (by email).

Weekly mean (average) for visible smoke obscuration recorded at emission point A55:

03/07/2019: 28.04% Obscuration

04/07/2019: 26.35% Obscuration

05/07/2019: 29.64% Obscuration

06/07/2019: 28.85% Obscuration

Weekly average: 25.96%

**S5N/19/42:** Schedule 5 Part A received 10/09/2019 (by email).

Weekly mean (average) for visible smoke obscuration recorded at emission point A55:

01/09/2019: 38.22% Obscuration

02/09/2019: 28.85% Obscuration

04/09/2019: 25.98% Obscuration

07/09/2019: 27.13% Obscuration

Weekly average: 25.47%

### **A55: Morfa Main Stack**

**Permitted limit is 20% obscuration (Ringelmann 1) over a maximum of 30 minutes in any day, expressed as a weekly mean value**

The Ringelmann Smoke Chart (BS 2742) is used to measure the smoke density or opacity (obscuration) of stack emissions. The method allows visual comparison of emissions against a five-step graduated chart with progressively darker shades of grey between white and black. The

method has limitations in that it relies on empirical measurements, the judgement of the observer and can be influenced by variations in physical conditions e.g. weather. Therefore, there is inherent uncertainty (which is difficult to quantify) when obtaining measurements using Ringelmann.

NRW understands that Ringelmann 1 corresponds to 20% obscuration according to the five-step scale outlined in the current published version of BS 2742 (2009).

#### **Schedule 5 Part A operator comment:**

*S5N/19/33: Return to Blast Furnace Gas under firing as soon as reasonably practicable.*

*S5N/19/42: Changed to Blast Furnace Gas firing on both batteries. Investigation ongoing*

#### **Schedule 5 Part B operator comment:**

*S5N/19/33: Due to reduced Blast Furnace availability there was a reduction in Blast Furnace Gas (BFG) being utilised which resulted in increased Coke Oven Gas being used in the batteries under firing system.*

*July 3rd: Air-intake box removed to install bus flue frames.*

*July 5th: Blockage in 42a (Green) COG distribution manifold causing localised burning & smoke.*

*S5N/19/42: The initial investigation indicated that there was a technical fault with the the reader base line, it was reading higher than what the actual obscuration level was.*

*During the weekend there was a high baseline on Battery 2, and therefore giving a false (High) stack obscuration reading.*

*Further investigations made by the area shows that there has been fuel changes (Battery 2) this week and some individual walls with issues are causing the higher readings, not the technical fault mentioned above.*

We note that the weekly mean obscuration value has been included in accordance with the permit reporting requirements. This value has been used to assess compliance with the permitted limit.

The following exceedance recorded at A55 and notified within **S5N/19/33** remains non-compliant with the permitted limit and Condition 3.1.2:

Weekly average: 25.96%

**One CCS Category 4 score** has been recorded in response to this non-compliance.

We have assessed and consolidated all subsequent notified exceedances of this emission limit during Quarter 3 2019 under a single CCS4 score for **S5N/19/33** confirmed above, in line with our Compliance Classification Scheme [CCS]. The consolidated notifications are listed below:

**S5N/19/42** received on 10/09/19

In our previous reports we highlighted that the monitoring and reporting arrangements for visible smoke obscuration at emission point A55 require clarification. Table S3.1 of the installation permit and Form Coke CEMS Smoke may also require updating to ensure this emission limit and monitoring standard is accurately and correctly reflected in the permit. A targeted compliance intervention will be arranged to address this issue initially, with any agreed changes being incorporated in a future permit variation.

#### **Summary and actions required**

Permit compliance

Natural Resources Wales (NRW) has consolidated permit compliance scores within this calendar quarter where appropriate and in line with our Compliance Classification Scheme (CCS).

Our assessment of notifications received during Quarter 3 2019 has concluded **two CCS Category 3 breaches** and **one CCS Category 4 breach** of the operator's permit conditions have occurred in response to notified exceedances of permitted emission limit values (ELVs) at the following emission points:

- A1 Sinter Plant Main Stack (particulates)
- A55 Morfa Main Stack (visible smoke)
- W1 Long Sea Outfall (total inorganic nitrogen)

This CAR form includes a **Warning** in response to the CCS breaches identified at emission points A1, A55 and W1.

The EC Industrial Emissions Directive (IED) introduces a stricter environmental compliance regime for Tata Steel's operations at Port Talbot and reflects a wider effort to improve the environmental performance of industry across Europe. NRW has a duty to enforce these new emission limits (BAT-AELs and BAT-AEPLs) in Wales, but we remain committed to working with Tata Steel to improve the environmental performance of Port Talbot steelworks.

#### Emission point A1

Tata Steel currently has an agreed improvement plan in place in relation to ongoing breaches of the permitted emission limit (ELV) at A1. This plan outlines a pathway towards sustained compliance with the limit for particulates. Progress against this plan has been captured and recorded in subsequent inspection reports during 2018-19.

While this improvement plan was active, we agreed to suspend previous compliance scores for particulates ELV breaches at emission point A1 - see **CAR\_NRW0033268**, **CAR\_NRW0034618** & **CAR\_NRW0034619**.

CCS scores can only be suspended for a maximum of six months; after this time, NRW will recommence active scoring to reflect our ongoing regulatory effort at the site (CCS Principle 5). This approach has been followed in respect of the permit breaches identified during Quarter 3 2019, and the CCS3 score confirmed in this report.

Whilst NRW must recommence active CCS scoring in response to identified ELV breaches at A1, it is also recognised that Tata Steel has improved the overall environmental performance of the sinter plant main stack abatement systems and continues to work towards sustainable compliance in accordance with its agreed improvement plan.

Should we find that progress towards compliance falters, stagnates or regresses we will review our regulatory approach to ensure Tata Steel takes all appropriate steps to ensure compliance with its Environmental Permit.

#### Emission point A5A

Targeted compliance interventions are undertaken periodically by NRW to understand the root cause(s) of any notifiable blast furnace bleeder valve releases. The outcomes from these interventions are confirmed separately.

#### Emission point W1

Tata Steel has notified NRW about several breaches of the permitted emission limit for total inorganic nitrogen (ammonia + nitrate + nitrite) during 2019.

We are concerned about the length of time it has taken to detect and notify these permit breaches to the regulator. According to the Part B information submitted by the operator, the delay appears



to be linked with a batch testing technique previously used to derive the nitrate + nitrite components of the analysis. This issue will be examined in more detail during a future compliance intervention.

It is acknowledged that the operator has taken steps to rectify the underlying cause(s) of these permit breaches, and there have been no further notifiable exceedances of the permitted emission limit for total inorganic nitrogen at W1 since Quarter 3 2019.

#### Areas requiring further attention/action

In our previous reports we highlighted that the monitoring and reporting arrangements for visible smoke obscuration at emission point A55 require clarification. Table S3.1 of the installation permit and Form Coke CEMS Smoke may also require updating to ensure this emission limit and monitoring standard is accurately and correctly reflected in the permit. A targeted compliance intervention will be arranged to address this issue initially, with any agreed changes being incorporated in a future permit variation. **(Action carried forwards)**

[END OF SECTION 2]

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0034620**

**This form will report compliance with your permit as determined by an NRW officer**

|                        |                         |            |            |
|------------------------|-------------------------|------------|------------|
| Site                   | Port Talbot Steel Works | Permit Ref | BL7108IM   |
| Operator/Permit holder | Tata Steel UK Limited   | Date       | 30/09/2019 |

### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

| Criteria Ref.       | CCS Category | Action required/advised                                                                          | Due Date   |
|---------------------|--------------|--------------------------------------------------------------------------------------------------|------------|
| See Section 1 above |              |                                                                                                  |            |
| E3                  | C3           | Bring permitted operations back into compliance with ELV.<br>IGNORE ACTION DATE - not applicable | 31/03/2020 |
| E1                  | C3           | Bring permitted operations back into compliance with ELV.<br>IGNORE ACTION DATE - not applicable | 31/03/2020 |
| E1                  | C4           | Bring permitted operations back into compliance with ELV.<br>IGNORE ACTION DATE - not applicable | 31/03/2020 |

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

| CCS category | Description                                                          | Score |
|--------------|----------------------------------------------------------------------|-------|
| C1           | A non-compliance that could have a major environmental effect        | 60    |
| C2           | A non-compliance which could have a significant environmental effect | 31    |
| C3           | A non-compliance which could have a minor environmental effect       | 4     |
| C4           | A non-compliance which has no potential environmental effect         | 0.1   |

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.