

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

Site	Port Talbot Steelworks	Permit Ref	BL7108IM
Operator/Permit holder	Tata Steel UK limited		
Regime	Installation		
Date of assessment	26 th September 2019		
Assessment type	Inspection		
Parts of the permit assessed	See section 2		
Lead officer's name	Neil Herbert & Doug Cowie	Accompanied by	N/A
Recipient's name/position	Claire Grainger – Environment Manager (S.H.E. Dept)	Date issued	1 st October 2019

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	N	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B2 - Infrastructure - Closure and decommissioning	N	
B3 - Infrastructure - Site drainage engineering (clean and foul)	N	
B4 - Infrastructure - Containment of stored materials	N	
B5 - Infrastructure – Plant and equipment	A	
C1 - General Management - Staff competency/training	N	
C2 - General Management - Management system and operating procedures	N	
C3 - General Management - Materials acceptance	N	
C4 - General Management - Storage, handling labelling, labelling and Segregation	N	
D1 - Incident Management - Site security	N	
D2 - Incident Management - accidents, emergency and incident planning	N	
E1 - Emissions - Air	N	
E2 - Emissions - Land and groundwater	N	
E3 - Emissions - Surface water	N	
E4 - Emissions - Sewer	N	
E5 - Emissions - Waste	N	
F1 - Amenity - Odour	N	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/ fibres/ particulates/ litter	N	
F4 - Amenity - Pests/birds/scavengers	N	
F5 - Amenity - Deposits on road	N	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	N	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	N	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	N	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	N	
H1 - Resource Efficiency - Efficient use of raw materials	N	
H2 - Resource Efficiency - Energy efficiency	N	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded		Total compliance score (see section 5 for scoring scheme)	
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If the number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Introduction

Pre-arranged inspection of the Sinter Plant.

On Monday the 23rd of September the sinter plant commenced a seven-day scheduled plant maintenance shutdown. This visit was arranged to inspect the maintenance and cleaning works underway on the two Electrostatic Precipitators (ESPs) which provide emissions abatement for the sinter plant's waste gas system (main stack).

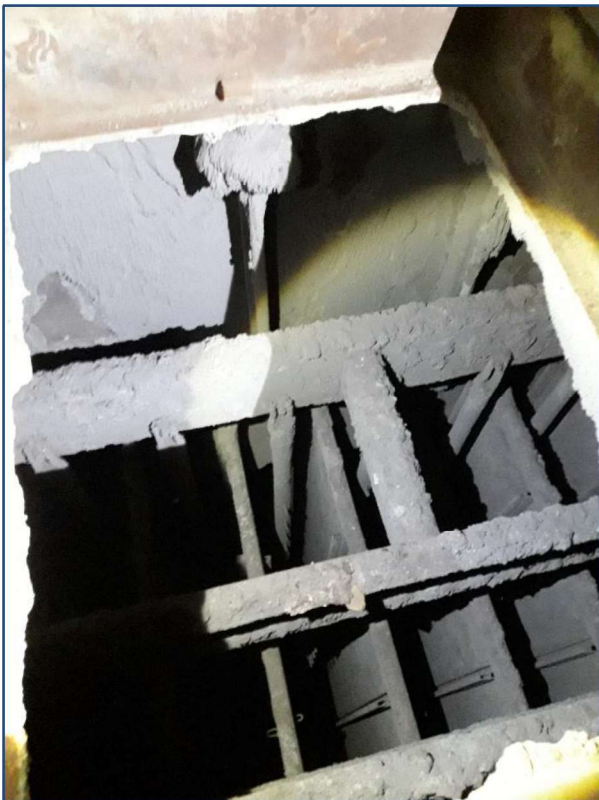
We did not inspect the smaller secondary de-dust ESP, but this was also subject to maintenance over the shutdown. We also inspected the noise abatement improvements being fitted to number 1 cooler fan serving the rotary sinter cooling conveyor and discussed further similar improvements for number 2 and number 3 cooler fans.

Sinter main stack ESPs

We inspected the interior of the South ESP and the North ESP from several viewing points within or under the ESPs. The electrode rods and collection plates (that we were able to observe) appeared to be in better condition when compared to NRW's last inspection of the North ESP (Sep 2018). It appears from the condition of the plates that Tata's 13-week maintenance programme (and revised rapping strategy) is proving effective. The damage seen in 2018 on some of the collector plates within the North ESP was not evident during this inspection, and Tata Steel's engineers confirmed they had not discovered any recurrence of this damage within either ESP.

Two double-dome valves (located between the chain conveyors and the ESP dust returns hopper) have also been refurbished as part of Tata's rolling maintenance programme for these assets. This approach involves sending the valves for periodic specialist maintenance in rotation and allows Tata Steel to pre-empt any serious degradation of valve seals and other critical components.

The photographs below show the interior of the South ESP when viewed through the inspection hatches located in the upper penthouse. During a major outage, stubborn dust deposits which cannot be removed by rapping alone are removed from the electrodes (rods) and collection plates within each power field.



Tata Steel's maintenance programme also focuses on the outer ESP casing which is comprised of steel plates. The casing is vital to maintaining the integrity of the waste gas system. Any damaged or degraded plates are 'overplated' or replaced to prevent air (oxygen) ingress, minimise pockets of turbulence within the ESP and reduce re-entrainment of ESP dust. Turbulence generated by leaks can lead to increased abrasion and wear of ESP components. The 13-week maintenance approach gives Tata Steel's engineers more frequent opportunities to address degradation and maintains overall ESP integrity. This is being borne out by a concurrent improvement in particulate emissions performance.

NRW welcomes the opportunity afforded by this 10-day outage to view the internal components of these ESPs. Any proposed relaxation of the maintenance frequency for these assets should first be discussed with the regulator.

Sinter Plant Circular Cooler – Cooling fans noise abatement improvement programme

As part of the operator's programme of improvement to noise abatement at the facility the operator will be installing noise enclosures and attenuators (silencers) to the three of the cooling fans on the sinter cooler conveyor. The other two fans have

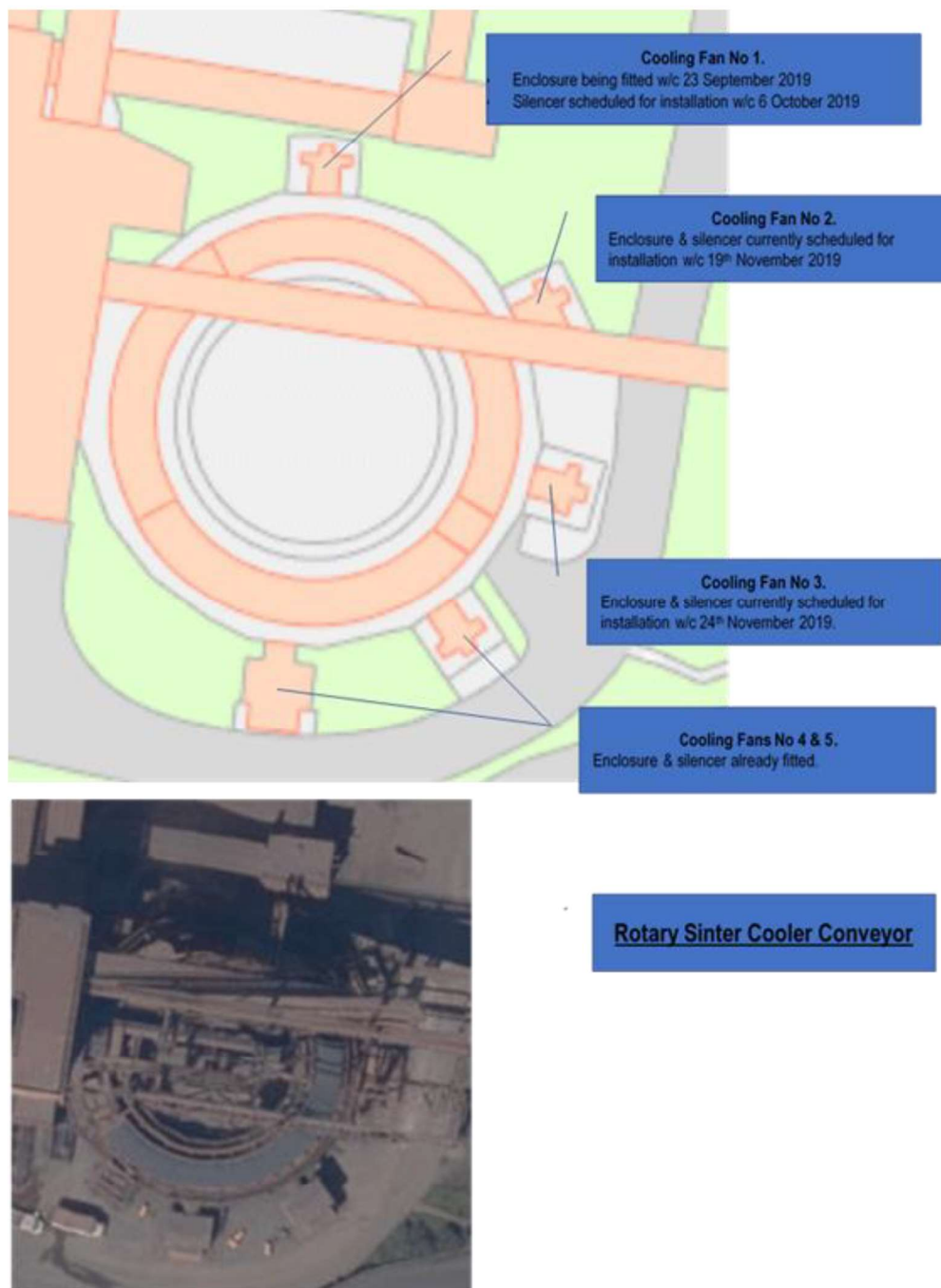
already had the infrastructure fitted. NRW recently sought an update from TATA on the installation schedule. This was provided recently and the most up to date schedule has been set out below. As part of this visit we inspected the new acoustic enclosure being fitted to the No. 1 fan. The attenuator will be fitted on the w/c 7th October.

The remaining fans (2&3) will be fitted with abatement units on the w/c 19th and 24th of November respectively. Due to their more accessible position, these two fans may not require a full plant shutdown in order to fit the necessary noise abatement infrastructure.

Action: operator to keep NRW informed of progress with sinter plant's noise abatement programme.

Sound Monitoring

The operator's sound monitoring exercise, scheduled to coincide with the shutdown period has not been possible to date, due to unsuitable weather conditions. However, the S.H.E. department did confirm that they would attempt such monitoring before the end of the current 10-day outage should an appropriate weather window arise.



Action: Tata Steel should communicate the key outcomes of any sound monitoring to the regulator.



Photograph showing enclosure being fitted on the number 1 cooler fan.



Photograph showing number 2 cooler fan.
Sound abatement scheduled for installation w/c
19th September.

End of section 2

Compliance Assessment Report

Report ID: CAR_NRW0035750

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Site	Port Talbot Steelworks	Permit Ref	BL7108IM
Operator/Permit holder	Tata Steel UK limited	Date	26 th September 2019

Section 3 – Enforcement Response

Only one box should be ticked

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

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			

See section 2 of this report for actions.

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 (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 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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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. 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.