

Natural Resources Wales permitting decisions

Tata Steel UK Limited (Orb Electrical Steels) decision document

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Permit Surrender

The application number is: EPR/CP3333BQ/S006

The operator is: Tata Steel UK Limited

The installation is located at: Orb Electrical Steels, PO Box 30, Stephenson Street, NP19 0RB

We have decided to accept the surrender of the permit for Orb Electrical Steels operated by Tata Steel UK Limited. The permit number is EPR/CP3333BQ.

The operator applied to surrender their permit as they have decommissioned the steel works. The full surrender application was received 8th July 2020 and was duly made as of 5th November 2020. A full surrender site condition report was submitted to Natural Resources Wales (NRW) within the application. The operator has applied to surrender the permit in full.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state. We consider in reaching that decision we have taken into account all relevant considerations and legal requirements.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account

Key issues of the decision

Receipt of application

Confidential information

A claim for commercial or industrial confidentiality has not been made.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.

The site

Pollution risk

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.

Along with a recent soil and groundwater investigation carried out for the surrender in January 2020, the site has undergone an extensive testing regime to ensure that the activities did not adversely impact the quality of the land and groundwater. Six monitoring boreholes have been monitored on a quarterly basis for the last 10 years. This analysis was specifically designed to look for accidental releases of the main process chemicals, including hydrochloric acid and aluminium orthophosphate. Groundwater quality has improved over the life time of the analysis.

The site also had bunded protection for any chemical and oil stores to mitigate any accidental spills or releases. All main areas of the site that stored or used chemicals were constructed on concrete hardstanding. The waste segregation area was built in a concrete bunded section with drainage and pumping systems not linked to the main site drainage. The site underwent audits to prepare a Site Protection and Monitoring Plan (SPMP) on a regular basis that looked at compliance and storage of potentially harmful chemicals.

Since the issue of the permit in 2004, there have been no major pollution incidents at the site and any minor spills have been remediated quickly and reported to NRW.

As part of the ISO 14001 Environmental Management System (EMS) audit programme, the site was inspected on an annual basis for compliance to environmental legislation and pollution prevention measures. There are no corrective actions or observations from the last two audit reports for 2018 and 2019.

Satisfactory state

We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state. In coming to this decision we have had regard to the state of the site before the facility was put into operation.

The site condition report submitted to NRW in support of the surrender application was referenced 'SCR Orb – Site Condition Report Template'. Geoscience specialists at NRW have reviewed the report, along with another report referenced 'RSK report 314640 Orb Steelworks Newport Final', in line with the principles contained within 'Regulatory Guidance Note, RGN 9: Surrender'. It was concluded that the information presented in the reports adequately demonstrates that there does not appear to have been any significant deterioration in the condition of the site during the lifetime of the permit (in terms of soil or groundwater contamination). On this basis, NRW have no concerns and have no objection to the surrender of the permit.

However, there may be contamination and sources that are historic and pre-date the permit which were not covered by the scope of the permit monitoring/ surrender assessment. These may need to be addressed in future, possibly by the planning regime as part of a site redevelopment or wider environmental legislations.

The basement sections of the site were problematic as oil residues from the rolling machines coated the walls. This was combined with the continual influx of groundwater through the concrete walls, which meant that a pumping system was required to remove water contaminated with traces of oil from the basement. The basements have been steam cleaned in order to remove any oil that had built up over the life time of the works and then the basement has been sealed to prevent ingress of groundwater.

This has been an ongoing process throughout the closure of the site to make sure the amount of water in the basement is kept to a minimum. However, rainwater from leaks in the roof and very small leaks of groundwater are continuing to enter the basement sumps, albeit at a greatly reduced rate. Tata Steel is implementing a system to pump any build up of water out of the sumps, through an interceptor and out through the storm water drainage system into the River Usk. All practicable methods have been used to make sure that the water is clean and the volume reduced to a minimum. It is thought that pumps will need to be activated once every 2 to 4 weeks, dependent on rainfall, for short periods of time to empty the basement sumps. An environmental permit is not required to discharge clean rainwater to a surface water.

Decommissioning of the site was completed on 10th July 2020. All barrels and IBCs have been removed from site. All bunds have been steam cleaned to remove any entrained oils or chemicals, The tanks on site have been cleaned out and made safe including the large waste oil processing tank. The above has been confirmed by the regulatory compliance officer who visited the site on 9th December 2020. Observations of the site visit are documented in Compliance Assessment Report CAR_NRW0037223.

Tata Steel do not intend to perform any remediation of the land or groundwater as no additional contamination has impacted the site since the environmental permit was issued.