

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	15 th June 2020		
Assessment type	Check Monitoring		
Parts of the permit assessed	2019 BF Bleeder Events root cause & 2019 PCDD Monitoring deficiencies.		
Lead officer's name	Neil Herbert (NRW)	Accompanied by	
Recipient's name/position	Claire Grainger – Environment Manager (S.H.E. Dept)	Date issued	16 th June 2020

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	N	
B2 - Infrastructure - Closure and decommissioning	N	
B3 - Infrastructure - Site drainage engineering (clean and foul)	ccs 3	2.3.1a & 1.1.1a
B4 - Infrastructure - Containment of stored materials	N	
B5 - Infrastructure – Plant and equipment	ccs 3	2.3.1(a)
C1 - General Management - Staff competency/training	ccs 3 (x2)	1.1.1b; 1.1.1
C2 - General Management - Management system and operating procedures	ccs 3	1.1.1a
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	A	
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	N	
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	ccs 3	3.5.1a
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	ccs 3	4.3.1a (& 4.3.2);
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	7	Total compliance score (see section 5 for scoring scheme)	28
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If the number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

2019 Bleeder release – final review of investigations (root cause)

- During 2019 there were 18 reported (Schedule 5 notifications) Blast Furnace bleeder release events (17 from BF5 and 1 from BF4).
- Several discussions between TATA and NRW have already been held¹ where a number of these events were discussed at length.
- Since our last site visit, TATA have submitted the remaining Schedule 5 Part B notifications (including a corrected submission on the 18th of May 2020).
- A recent phone conference (23rd April 2020) was also held where TATA presented their investigations findings into the stockyards drainage issues highlighted in S5N/19/45 and S5N/19/47. These drainage problems, which occurred in September and October 2019, contributed to the October bleeder releases.

NRW general comments and observations:

- For each event the investigation reports conclude that the bleeder valves functioned properly and as designed (which is to provide an emergency means to relieve furnace pressure).
- It also appears that once the bleeder valves had been automatically activated, the control room operatives took immediate steps to reduce furnace pressure (i.e. by opening of the snort valves) and allowing the bleeder valves to close.
- TATA have also identified the (suspected) cause/s behind each of these events. In almost all cases there are a combination of factors which collectively trigger furnace instability and cause the valves to open. Tata have specified a number of actions to reduce the frequency of events in future.
- TATA have reported that all these actions have now been completed.

Case specific comments:

October 1 and 2nd October BF 5 and BF4

The two October bleeder releases, which occurred at both blast furnaces, were attributed to furnace instability. This was in turn influenced by a combination of factors, from the availability of dry stock sinter of optimum strength and quality, to the flooding and saturation of raw material stockpiles used to form the blast furnace direct charge. Whilst several contributory factors appear outside of the operator's control (notably an unexpected extended sinter plant stop, deteriorating stock sinter quality and a prolonged period of heavy rain), the deficiencies in the stockyards drainage system, whereby the raw material stockpiles flooded, should have been preventable. Had the drainage system been subject to a formalised inspection and cleaning regime, at regular intervals, then the yards should not have flooded. Tata have now implemented a series of improvements to ensure that this does not happen again.

A summary of the key improvements includes:

- The stockyards drainage system has now been subject to an extensive deep clean and it is understood that all blockages have been cleared.
- Some drainage infrastructure has been replaced or upgraded (e.g. French drain cleaning and manhole cover repair).
- A revised procedure has been developed and a task placed on TATA's 'SAP' plant maintenance system to ensure thorough inspections of the drainage system will be undertaken on a regular basis (quarterly).
- TATA is in a stronger position to react to future heavy rainfall events and can call on the provision of extra emergency pumps should the need arise.

Note: the improvements to the drainage system were tested earlier in 2020 following a period of heavy rain (Storm Dennis). The heavy rain over this period did not overwhelm the newly cleaned drainage system. This is illustrated in the following photographs.

¹ See CAR reference: NRW0034619 30th June 2019 (issued 22nd January 2020) & CAR Reference: NRW0036102 25th November (issued 18th December 2019)



Photographs showing before and after improvements to drainage systems

Compliance:

There should have been a regular and robust inspection/ maintenance regime in place to ensure efficacy of the site's drainage system. This failure is considered contrary to **conditions 1.1.1a and 2.3.1a** of the permit. As this is only one of several contributory factors that caused the bleeder events, we have categorised this failure as a minor breach. A compliance classification score (ccs) of 3 has been attributed to this breach (against the b3 compliance heading).

25th June and 19th August – BF 5

These two events were both partly attributed to a "challenging" recovery following an un-planned shutdown of the blast furnace. It also appears that a further contributory factor for both events was the delay in implementing a furnace check, by the plant operative. TATA have now completed a review of the furnace checking procedure to ensure a timely intervention to reduce likelihood of a burden slip. We understand that operatives have received some addition training subsequent to this review to share the lessons from the event.

Action: Tata to provide a copy of the revised procedure for furnace checking on time, to avoid larger burden slips.

Action: Tata to provide confirmation that all relevant staff (e.g. furnace operatives (on both Blast Furnaces)), have been made aware of the new procedure and where appropriate received awareness training.

8th to 13th February -BF5

A series of releases occurred between the 8th and 13th of February and these were primarily caused by furnace instability and Tata have developed improved procedures/practices for burden distribution within the furnace to help reduce this instability.

However, whilst it appears the initiation event for the release that occurred at 3:45 a.m. on the 13th of February 2020 was not necessary preventable, it is clear that the bleeder valve should have closed sooner. The previous releases lasted no longer than 17 seconds, but the event on the 13th lasted nearly 2 minutes. This resulted in a greater disturbance to residents, particularly given the event occurred in the early hours (3:46a.m.). The underlying cause has been identified and has since been corrected (an operative had keyed-in the incorrect set point for an interlock between the bleeder valves). Whilst Tata have indicated that the set point has been corrected, there is no mention of any review to procedures and/or training to prevent a re-occurrence of this situation again?

Action: Tata to provide confirmation that this procedure has been updated (or provide other evidence of corrective measures).

Action: Tata to ensure that the lessons from this event been applied to BF4 (if applicable)?

Compliance: It is unclear whether this error was attributable to a deficiency in the operative's expertise or deficiencies in the site's procedures. Eitherway the failure is considered contrary to condition 1.1.1. Given that this is only one of several contributory factors, we have categorised this failure as a minor breach. A ccs score of 3 has been attributed to this breach (against the c1 compliance heading).

It was also identified that blockages in the gas cleaning pipework were another contributory factor. It is noted that TATA planned an inspection of the BF5 gas plant to identify the source of the blockage material.

Action: TATA to provide findings of this inspection. Tata also increased the frequency of cleaning the gas-plant filters.

Action: Tata to confirm whether any of these subsequent inspections revealed any further debris residing in the system?

7th March 2020 – BF5

This event was partly caused by a fault with a gas back-pressure valve which led to the bleeder activation. This defect has been rectified and the system re-designed to prevent a similar problem occurring again. It is unclear whether a similar event could occur on BF4 and the operator is asked to clarify whether this is the case and if so whether the same corrective action has been completed for the BF4 systems. **Action.**

16th February and 12th March 2019 – BF5

One of the actions from both events was a review of casting practices to ensure low liquid levels in the hearth. **Action:** TATA To provide a copy of this revised procedure.

Conclusions:

Blast furnace bleeder valves are a necessary emergency feature present in all blast furnaces. It is understood that all steelworks operators wish to avoid and minimise bleeder events, not only from an environmental and nuisance perspective, but also as it negatively affects process stability which reduces molten metal yield and profitability. The reports (Part B) submitted by Tata indicate that the bleeder valves did function correctly and as designed. In a small number of cases, some of the contributory causes may have been avoidable as outlined in this report. We have applied CCS scores where we believe the operator has not complied with the environmental permit requirements. However as there were other contributory factors in these cases, it is unclear whether these events (bleeder openings) would have occurred even if the permit requirements had been met in full. The complexity and variability associated with the unstable period following the blow-in (restart) of Blast Furnace 5 in early 2019 is noted and recognised.

What is important is that the operator investigates all these events promptly and implements any corrective action(s) in a timely fashion to reduce a risk of re-occurrence.

2019 PCDD monitoring – Sinter Plant

Background

On the 31st January 2020 Tata notified NRW that the 2019 PCDD emission result (0.63² ng/m³), at the A1 monitoring point, was above the permit limit (0.4ng/m³).

The EPR permit requires the operator to undertake two suitable sampling exercises every year. One sampling exercise is undertaken between January and June, whilst the second is required between July and December. The samples are used to determine the emissions of PCDD from the sinter plant. The results from these two samples are then averaged to provide the value used for compliance assessment purposes.

- The first sampling exercise was undertaken on the 5th June 2019 and the results indicated that PCDD levels were elevated at 0.54 ng/m³ (±0.9).
- The second sampling exercise was undertaken on the 5th December 2019 and the analysis revealed the sample had elevated levels of PCDD at 0.71 ng/m³ (±0.12).
- An average of these two values gives a result above the site's emission limit (even when the uncertainty is applied).

Tata notified NRW of the results on the 31st of January 2020 and the operator was asked to undertake a comprehensive investigation into the alleged exceedances during 2019. The operator had also arranged for the emission point to be subject to a re-sampling exercise in order to verify the results. This was scheduled for March 2020, with further monitoring in May and July or August. Unfortunately, due to the UK wide Covid 19 pandemic lockdown restrictions that were implemented in late March, the monitoring team were unable to attend site. The operator has since made other arrangements, with another testing provider and monitoring is now scheduled to be undertaken in the next few weeks (June 2020).

The operator has also presented the findings of their investigation to NRW. The key findings² of these have been summarised (overleaf).

² If the uncertainties are applied the result is still above the emission limit (0.52 ng/m³)

Investigation findings into elevated levels - summary

June 2019

Evidence was presented by Tata which indicated that halfway through the sampling exercise, the plant's sintering process became unstable and erratic, resulting in two unplanned stoppages. Tata also determined that over this same sampling period there was no addition of urea (an additive which inhibits PCDD formation).

It appears that the sampling team was unaware that the process had become unstable and that urea abatement system was offline.

December 2019

The second sampling exercise was undertaken in December. The investigation found that over the entire sampling period (09:18 until 11:08) the sinter process was unstable, due to issues with raw materials. The instability continued until 14:00 when the sinter plant operatives had to initiate an unplanned stop. However, unlike the June event, the urea abatement system was functioning normally during the December sampling.

Once again, the sampling team were unaware that the plant was not operating in a steady state during the duration of this sampling exercise.

Compliance – emission limit exceedance

The emission limit specified in the permit (condition 3.1.2) is derived from the BAT reference document for Iron and Steel Production. This specifies that the permit limit is only applicable for a sample taken “under steady-state conditions”. NRW have concluded that Tata have provided sufficient evidence to demonstrate that the plant was not operating normally over both the June or December sampling periods and that the subsequent monitoring results cannot be used to assess compliance with this emission limit (0.4) - condition 3.1.2.

However, whilst we have been unable to assess the result against the permit's emission limits, other non-compliances have been identified.

Monitoring and reporting deficiencies

Both sampling exercises undertaken in June and December were undertaken by *Tata Steel Group Environment*. We understand that this is a division of the wider TATA business, although this team is based in Sheffield and not Port Talbot.

Following the June 2019 sampling exercise, and once the elevated PCDD results were available, Tata Steel UK Ltd i.e. the installation permit holder should have ensured the immediate scheduling of a re-sampling exercise in August (September at the latest), to verify the elevated result. However this was not done and the next sampling exercise was not undertaken until six months later - December 2019.

The elevated results for the June event should have been reported to NRW in August, when the preliminary findings were available. The Schedule 5 notification (detailing both exceedances) was not submitted until February 2020.

The two monitoring reports compiled by the Tata Steel Group for the June and December sampling exercises, set out: the parameters tested; date and time of sampling; the results of the testing; sampling method used; the status of the plant during the sampling period including abatement status; and any issues encountered during the exercise. We have reviewed these two reports and have noted some serious inaccuracies, namely:

- the June monitoring report states quite clearly that the plant was in “normal operation” but in fact this was only the case at the start of the test. It is unclear how or why this information was not communicated when sampling staff were establishing the plant's parameters (either during sampling or later when compiling the monitoring report);
- The June report also indicates that “Urea injection” abatement was functioning; however, this was not the case. Again, it remains unclear how or why this was not established when the report was being compiled.
- In the December report the document once again states that the plant was in “normal operation”. However, this is false the plant was not operating normally, in fact it was so unstable the process was shut down later that day.

During Tata's investigation it was acknowledged that there had been deficiencies in the communication between the works area (i.e. Port Talbot) and the testing provider. There were also clear deficiencies in (some) staff awareness and/or competence in terms of:

- the significance of the tests;
- the requirements of the test (e.g. steady state);
- the importance of a prompt re-test,
- effective communications between the various departments;
- the importance of verifying information prior to approving key documents (monitoring reports)

The operator has since implemented a series of improvement to reduce the likelihood of this happening again, however two key reports issued by TATA personnel, had at least three inaccurate statements for fundamental test criteria – that should have been easy to avoid had staff communicated properly.

Compliance – monitoring failures

Tata must have in place robust procedures to ensure their monitoring obligations are adhered to and monitoring is undertaken in accordance with the permit. In the case of PCDD compliance monitoring, when the process is not in a *steady state*, a re-test needs to be re-scheduled immediately. The monitoring provider must also ensure that any report is accurate. As consequence of these deficiencies and those noted above NRW believe that the operator have contravened the following conditions:

Condition 1.1.1 (a) The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints. A ccs score of 3 has been allocated to this failure, against the c2 compliance heading.

Condition 1.1.1 (b) The operator shall manage and operate the activities using sufficient competent persons and resources. A ccs score of 3 has been allocated to this failure, against the c1 compliance heading.

TATA are also unable to provide evidence for the 2019 period, that appropriate³PCDD monitoring was undertaken, that can be used to determine compliance with THE emission limit set by condition 3.1.2. We therefore consider this is also a general monitoring failure and contrary to the requirement of the following:

Condition 3.5.1(a) The operator shall ... undertake the monitoring specified in the following tables in schedule 3 to this permit: point source emissions specified in tables S3.1 ...

A ccs score of 3 has been allocated to this failure, against the g1 compliance heading.

Actions

- Monitoring awareness training to be provided to all relevant TATA personnel.
- Tata will revise and update their monitoring procedure to include:
 - improved procedures for the planning and scheduling of monitoring;
 - improve communication prior, during and post monitoring (particularly to ensure that plant operating parameters are reported accurately);
 - specify that any elevated results are communicated to NRW within 24 hours of the availability of the validated results.

Urea Abatement failure - June 2019 (and 4th March 2020)

During the June sampling exercise there was no urea abatement due to problems with delivery and storage issues. Tata did not submit a notification for this failure.

Note: there was a loss of abatement in March 2020 and on this occasion the operator did notify the regulator of this failure.

³ In accordance with the standard and relevant BAT conclusion

Compliance – urea abatement

The permit's approved operating techniques specifies that urea addition is used to suppress the formation of PCDD at the Port Talbot sinter plant. The loss of urea abatement on the 5th of June 2019 (& March 2020) is therefore considered a breach of **condition 2.3.1(a)**. A ccs score of 3 has been allocated to this failure, against the b5 compliance heading.

This loss of abatement in June 2019 should have been reported to NRW in accordance with the notification's requirements of the permit. This failure is considered a breach of **conditions 4.3.1a and 4.3.2** of the permit - Schedule 5). A ccs score of 3 has been allocated to this failure, against the g4 compliance heading.

Actions:

1. The operator has now implemented a revised urea resupply procedure facilitate the continuous addition of urea.
Action: completed.
2. Given the criticality of the urea abatement system, the operator will need to examine means of improving the contingency arrangements for urea addition.
3. During the monitoring on the 5th June, two unplanned interruptions were offered as primary explanation into the elevated PCDD result. Tata need to determine how often these interruptions occur.
4. The elevated levels in December have been attributed by TATA to instability due to ore levels running low. Tata need to determine how often these interruptions occur.
5. The loss urea abatement must be reported to NRW in accordance with the requirements of the permit.

Conclusions

Whilst there are a number of deficiencies identified in this report it is acknowledged that the operator appears to have undertaken a thorough investigation into the failures noted in this report. This is despite the challenges posed by the Covid 19 pandemic. They have also proposed (and in some cases already implemented) a series of measures to minimise the likelihood of these occurrences happening again.

End of section 2

Note: Novel Coronavirus (COVID -19)

During the compiling of this report an escalation in the threat posed by the novel coronavirus (COVID – 19) pandemic, has resulted in the imposition of several stringent measures across the United Kingdom.

These measures to control and reduce the spread and impact of the disease are having an impact on both NRW's and the operator's normal operating practices. At the time of writing all routine regulatory visits have been suspended by the regulator.

During this pandemic there will be a continued expectation that operators continue to meet the conditions of their permits.

Where the operator has identified an issue that is likely to result in permit non-compliance or increased environmental risk, the operator is expected to speak to the regulator at the earliest opportunity.

Compliance Assessment Report

Report ID: CAR_NRW0036667

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	Date	15 th June 2020

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.

x

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			
b3	ccs3 (1.1.1a & 2.3.1a)	Bleeder Releases (October 2020) - The stockyards drainage system has now been subject to an extensive deep clean. - Some drainage infrastructure has been replaced or upgraded (e.g. French drain cleaning and manhole cover repair). - A revised procedure has been developed and a task placed on TATA's 'SAP' plant maintenance system to ensure thorough inspections of the drainage system will be undertaken on a regular basis (quarterly). - Availability of extra emergency pumps	Completed
c1	ccs3 1.1.1	Bleeder Release (8th to 13th February) Action 36667.1: Tata to provide confirmation that the procedure (for setting set point for bleeder valve interlocks) has been updated (or provide other evidence of corrective measures).	To be agreed at next scheduled meeting between NRW and Tata.
		Action 36667.2: Tata to confirm that the lessons from the 8th to 13th February bleeder releases are applied to BF4 (if applicable)?	To be agreed at next scheduled meeting between NRW and Tata.
		Action 36667.3: TATA to provide findings of the inspection of the gas plant (to identify the source of the blockage material). Action 36667.4: Tata to confirm whether any of these subsequent inspections revealed any further debris residing in the system?	
c2	ccs3 1.1.1. a	Action 36667.5: Tata will revise and update their monitoring procedure to include: - improved procedures for the planning and scheduling of monitoring; - improve communication prior, during and post monitoring (particularly to ensure that plant operating parameters are reported accurately); - specify that any elevated results are communicated to NRW within 24 hours of the availability of the validated results.	Tata to confirm whether this has already been completed

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			
c1	ccs3 1.1.1b	Action 36667.6: Monitoring awareness training to be provided to all relevant TATA personnel.	Tata to confirm whether this has already been completed
g1	ccs3 3.5.1a	Action 36667.5: Monitoring of the A1 emissions for PCDD will be undertaken by the deadline specified (unless otherwise agreed with NRW). Thereafter Tata to ensure that all future PCDD sampling is undertaken to the frequency and the requirements of this permit.	30 th June 2020
b5	ccs3 2.3.1a	The operator has now implemented a revised urea resupply procedure facilitate the continuous addition of urea. Action: completed.	Completed
		Action 36667.6. operator will need to examine means of improving the contingency arrangements for urea addition system.	To be agreed at next scheduled meeting between NRW and Tata
		Action 36667.7. Tata need to determine how often the interruptions to the sintering process, that led to the June PCDD emissions, occur.	
		Action 36667.8. Tata need to determine how often the instability (due to ore levels running low) that led to the Dec PCDD emissions, occur.	
g4	ccs3 4.3.1a and 4.3.2	Action 36667.9. Tata to ensure, all future notifications are submitted in accordance with the permit.	Immediate
		Bleeder Release (25th June & 19th August) Action 36667.10.: Tata to provide a copy of the revised procedure for furnace checking on time, to avoid larger burden slips.	To be agreed at next scheduled meeting between NRW and Tata
		Bleeder Release (25th June & 19th August) Action 36667.11.: Tata to provide confirmation that all relevant staff (e.g. furnace operatives (on both Blast Furnaces)), have been made aware of the new procedure and where appropriate received awareness training.	
		Bleeder - 7th March 2019 This event was partly caused by a fault with a gas back-pressure valve in BF5. This defect has been rectified and the system re-designed to prevent a similar problem occurring again. Action 36667.12. Tata to ensure that the lessons from the 7th March 2019 bleeder releases are applied to BF4 (if applicable)?	
		Bleeder event 16th February and 12th March 2019 – BF5 Action 36667.13: TATA to provide a copy of the casting practice procedure which was revised following this event.	

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.