

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

Site	Llanwern Steelworks NRW/EPR/BS3905IP/V004				Permit Ref	BS3905IP		
Operator/ Permit holder	Tata Steel UK Limited							
Date	02/07/2015				Time in	09:30	Out	16:00
What parts of the permit were assessed	Quarterly returns, zodiac line, pickle line, pickle ETP, OMS, waste management centre.							
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge	
Recipient's name/position	Stephen Thomas, Senior Environmental Technician							
Officer's name	Richard Taylor, Gareth Richards				Date issued	23/07/2015		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	A	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Tata Llanwern site handover audit.

July 2nd 2015.

Present- Stephen Thomas, Tata Senior Environmental Technician; Hayley Jeremiah; Tata Environmental Technician, Dr Gareth Richards, NRW; Ashley Lansdown, NRW; Richard Taylor, NRW.

The purpose of this CAR form is to officially record the site inspection and handover to a new site officer (Gareth Richards) from Richard Taylor.

An agenda was sent to the site prior to the inspection and followed throughout the day. The headings are reproduced below for continuity.

Health and Safety Induction – An induction was provided by Mike Gray, this is valid for 3 years from the date of delivery.

1. **Business Update** – Overall Production has increased by 2% in a year on year management plan. The North American market place is a growing consumer. The Zodiac plant is the flagship site within the site and supplies galvanised steel of differing quality to most UK car manufacturers. Site has launched an annual plan for 2015-16 which includes an environmental plan. The environment was listed as the 2nd most important priority for the company. This was seen as a proactive stance by NRW. Recycling targets were exceeded by 46% during the last reporting period. This was corroborated by the pollution inventory returns for the last 2 years where waste to tonne production figures have dropped from 0.43kg/t product to 0.32 kg/t product. Site have employed Veolia to carry out all waste removal services on site except oils and scrap metal. Site is pushing for a 'zero waste to landfill' policy with Veolia, which is commendable. Site also has introduced a memo card system called 'EIF', which are given out to all site visitors and contractors. These include site contact numbers and contain basic level awareness of environmental management systems topics, such as, permits, CCS scoring system and how this feeds into the annual subscription charges. Site currently employs approximately 450 permanent staff, plus 800 contractors. Site prioritises annual performance data and the CCS scoring system and communicates this importance to all site staff. Tata has internal auditors based at the larger Port Talbot sister site. There is also an initiative to reduce energy use throughout the site through a drive called 'energy wave' which identifies and quantifies energy reduction measures which can be quantified.

2. Site were informed of the internal restructuring within the Natural Resources Wales South East area where a 'place based team' approach has been adopted. This has led to the change in inspector.

3. **Waste to China issue.** This issue has effectively been parked following a letter sent to Richard Leonard (Tata Port Talbot Environment Manager) by NRW on 29th Apr 2015. NRW are aware that there is a potential iron ore substitute in the sites legacy collection lagoons ~1m tonnes iron rich fines. The end of waste decision taken by the then regulator (The Environment Agency) still stands with a view to exporting the fines to the two Chinese plants mentioned in the letter, but the permission of the Chinese Municipal authority must be in place before export is made.

4. **Strike Action.** NRW issued an email to site on 9th June 2015 to effectively state that we expect the site to have provision to meet environmental compliance in the event of strike action taking place. Site informed that an emergency crew will be in place to ensure this happens.

5. **Boiler De-rating.** Site confirmed they have de-rated the thermal input capacity of the packet boiler to

49.5MWth. This raised a question over the current status of the permit. At present the packet boiler house is listed as a schedule 1 activity. The new capacity drops this into a directly associated activity which requires a permit variation. Action – RT to check with permitting team. Action closed, permitting team will vary the permit after the BREF review is issued unless site wish to apply for the variation themselves. Site will be billed for the variation on both outcomes. The annual subscription costs are likely to be reduced on the removal of the schedule 12 activity. Alternatively the new site inspector (GR) can ask for the permit to be varied, or regulate the site in the knowledge that the permit is not fully accurate. Action – Site to forward copy of new rating certificate issued by Cochran's to new site inspector GR.

6. IED Issues. The metals processing BREF review has not yet commenced. Therefore the current guidance remains in place. The baseline for the site condition reports is the one submitted at the time of the permit application on 31/07/02. This forms the basis for the site ground water and soil quality which the IED requirement for 10 yearly soil analysis and 5 yearly groundwater quality can be measured against.

7. M4 relief road. The present M4 relief road plan will pass the side to the South, and outside the permitted boundary area, although the legacy iron rich lagoon landfill sites regulated under a separate permit will be skirted. Building work is scheduled to commence in March 2016, but this is likely to be put back. The site has an outflow pipe for the surface water drainage which is monitored for water quality, but this also contains groundwater draining from Queensway, which can have an effect on the permitted levels of contaminants. NRW's concern is that the current monitoring is not representative of the site surface water, and that this is likely to increase further as more local drainage is connected into Tata's existing pipe network. There was a meeting scheduled with Costain's. Tata were requested to advise NRW of any proposals. Action: Tata.

8. Acid Scrubber. Historical HCl permit breaches have been associated with the acid scrubber. Tata have submitted a request for Capex for a replacement, which is now under internal review. Action- site to inform GR if/when the new abatement equipment is approved.

Tata have an in-company monitoring team using MCERTS standards. No external contractors are employed on site to carry out independent monitoring. This situation will be examined in the next OMA audit due – 22/11/16, unless the new site inspector deems it necessary to carry out an OMA before this date.

9. Oily Mill Scale (OMS). The on-site stockpile of OMS was reported to have been reduced. (Confirmed on site tour). This material is taken for cleaning in the barrel wash facility at Tata Port Talbot, before reuse in the blast furnace. The amount of OME produced at Llanwern is proportional to the amount of final product and is approximately 2.0 to 2.5%, hence 100,000 tonnes product results in 2000-2500 tonnes OMS.

10. Permit Items. NOx - It was noted from recent quarterly returns that NOx releases (concentration) have been steadily creeping up towards the permit limit especially from emission points A5, A15, and A16. It was recommended that Llanwern proactively manage this and check the monitoring regime is functioning correctly. The last Quarter returns were A5 - 92% of max; A15 – 94% of max, and A16 – 87% of max. All were within limits and within uncertainty thresholds.

11. Suspended Solids. The latest return showed SS at 122mg/l against a maximum 100mg/l. Under permit condition note 5, the limit is not breached if the peak spot sample does not exceed 1.5 times the limit, i.e., 150 mg/l, provided that 95% of all weekly spot samples in a rolling 6 months period do not breach the limit. Outstanding Mercury result. Site are required to provide the W1 mercury result ASAP. Action – Tata to forward the mercury result for the last Quarter.

12. Site Tour

The site tour took in the Zodiac Line, Waste Management centre, OMS storage area, Rolling mill, pickle line ETP, the hot mill sludge filter press, and the pickle line effluent treatment plant. The site was clean and tidy. The rolling mill was operating, but the Zodiac line had an unscheduled outage at the time of the visit. The recycling centre is run by Veolia staff and handled all site waste. This was well segregated and appeared to be thoroughly organised in line with the site's proposed zero waste to landfill aim. Staff were present at all locations and displayed expert levels of knowledge about their work. Credit must be given to Steve Yeates, Andrew Perry, Mike Gray, and Chris Obrien for their contributions, as well as the Environment team.

	EPR Compliance Assessment Report	Report ID: BS3905IP/0243442	
This form will report compliance with your permit as determined by an NRW officer			
Site	Llanwern Steelworks NRW/EPR/BS3905IP/V004	Permit	BS3905IP
Operator/ Permit	Tata Steel UK Limited	Date	02/07/2015

Section 3- Enforcement Response	Only one of the boxes below 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)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			

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 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 which 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 fulfill 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.