

SCHEDULE 5 Notification

Part B

Permit Number:	BS3905
Name of Operator:	Tata Steel UK Ltd
Location of Facility:	Llanwern Works
Part A details	Elevated oil levels at W1 effluent release point
Date Part A submitted	02-09-16

Any more accurate information on the matters notified under Part A	Elevated oil levels were observed on the 24th, 29th and 30th August. Visual checks of the site's effluent/drainage system at the time of the initial results being received did not match the laboratory results. There were no EIFs or reports of oil losses, no visual markers and no process variables that may have contributed. Therefore the primary stage of investigations centred around sampling techniques and procedures were reviewed. On investigation by the Hub's Technical Laboratory team it was discovered that due to a modification of the analysis method the data published over an identified time period would need to be excluded (24th August – 1st September inclusive). This time period includes the dates where the breaches were reported. The root cause was the change of analysis method required following lack of analysis check standards, which led to a drift out of specification. This was not identified until standards were replaced. The time period for the testing under these conditions was nine days. However with the time delay in reintroducing the standard an alternative, historical method was used for a specified period in the interim time whilst the primary methodology was unavailable. The data for this period is still valid (2nd September – 8th September). The primary methodology has been back in use since the 9th September 2016.
Measures taken, or intended to be taken, to prevent a recurrence of the incident	Due to the performance of the analyser the use of the technique without a check standard was deemed low-risk. Due to the time delay being able to reintroduce standards subsequently the decision to use an alternative method was taken. The recommendations from the data review are; • Minimum stock level of key consumables to be reviewed • The issue of blocked vendors is to be raised within the Hub to minimise the risk of reoccurrence of key consumables not being available in a timely manner • Analyser redundancy and maintenance periods to be reviewed to minimise the time with restricted availability.
Measures to be taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission	N/A

The dates of any Part A notifications in the previous 24 months	2016 08 21 – URA suspended solids 2016 08 15 – URA suspended solids 2016 08 09 – URA suspended solids 2016 07 16 – URA suspended solids 2015 11 19 – URA suspended solids 2015 10 08 – URA HCL PL2 2015 09 24 – URA suspended solids 2015 01 26 – URA Effluent
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Name*	Fiona Abbott
Post	Environment Manager
Signature	
Date	03-10-16
Reference	2016 08 24 & 29 – URA oil 2016 08 30 – URA oil