

Compliance Assessment Report

Report ID:
CAR_NRW0033787

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

Site	Port Talbot Steel Works	Permit Ref	BL7108IM		
Operator/Permit holder	Tata Steel UK Limited				
Regime	Installations				
Date of assessment	11/07/2018	Time in	10:30	Out	14:30
Assessment type	Audit				
Parts of the permit assessed	1 Management; 2 Operations; 3 Emissions and Monitoring; 4 Information				
Lead officer's name	Cowie, Douglas				
Accompanied by	Broom, Mark,Gibson, Paul				
Recipient's name/position	Claire Grainger/ Environment Manager	Date issued	13/08/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. 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	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	X	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	X	
E1 - Emissions - Air	O	3.1.2 Emissions to air
	O	3.1.2 Emissions to air
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	X	
H1 - Resource Efficiency - Efficient use of raw materials	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

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 Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Site description

Tata Steel UK Ltd (Tata Steel) operates an integrated iron and steel works at Port Talbot, Neath Port Talbot. The site is permitted as an installation under the Environmental Permitting Regulations (EPR). Tata Steel has several defined industrial processes which are carried out sequentially across the installation to convert raw iron ores and coal to semi-finished (slab) and finished steel products (such as hot rolled, pickled and oiled, cold rolled and annealed steel). The permit also covers coke making and the reception, stockpiling and blending of raw iron making materials. Four other companies – Cambrian Stone, Harsco Metals, Runtech and ICL – are contracted to undertake their own permitted activities at the steelworks on Tata Steel's behalf.

Purpose of visit/assessment

This intervention focused on the Sinter Plant, Coke Ovens and fugitive dust management and control at Port Talbot steelworks.

NRW has received an increasing number of complaints about emissions from the steelworks during 2017. Tata Steel continues to notify us about breaches of the permitted emission limit values (ELVs) for dust (particulates) at the Sinter Plant main stack (A1) and visible dust emissions from Coke Oven Doors, Tops and Charging (A54). These ongoing ELV breaches and emissions are of concern to NRW.

Tata personnel also provided an update on the Capital Expenditure (CAPEX) environmental improvement projects which are ongoing at Port Talbot steelworks. Some of these projects have introduced or are introducing plant improvements and upgrades which are necessary to comply with the Industrial Emissions Directive and the Best Available Techniques Conclusions (BATc) for the Iron and Steel industry sector.

Lastly, NRW outlined its regulatory approach for the above works areas.

The relevant permit conditions are listed under Sections 1.1, 1.2, 1.3, 1.4, 2.1, 2.3, 3.1, 3.2, 3.5, 4.1, 4.2, 4.3 and 4.4 of Tata's permit.

Person(s) present

Tata Steel	
Martyn Duggan	Manufacturing Director (Heavy End)
Ian Vaughan	Works Manager (Ironmaking)
Dean Vincent	Works Manager (Coke Production & Gas Plant)
Gareth Symons	Head of Health, Safety and Environment

Andrew Townsend	Fire and Environment Manager
Claire Grainger	Environment Manager
Stuart Lloyd	Project Manager (Sinter Plant)
Ryan Lipscombe	Senior Project Engineer
NRW	
Paul Gibson	Team Leader
Mark Broom	Technical Specialist
Doug Cowie	PPC/RSR Officer

Sinter plant

The Sinter Plant prepares, blends and heats raw materials for use in the blast furnaces. It has three permitted emission points:

1. Sinter plant main stack (A1)
2. Sinter plant secondary de-dust stack (A2)
3. Sinter plant mixing and rolling drum stack (A3)

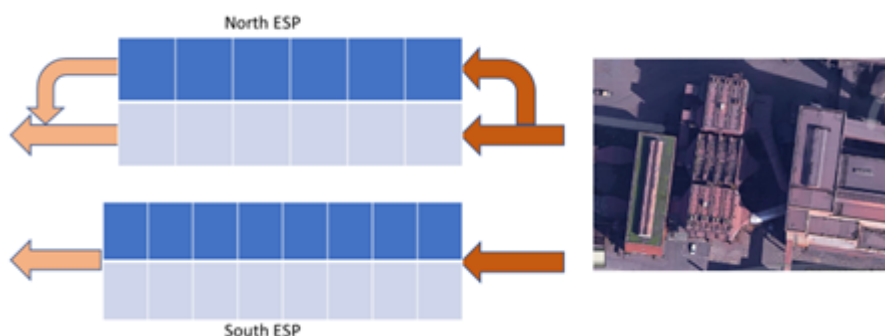
NRW has undertaken a programme of targeted inspections focusing on emission points A1 and A2. During this intervention we focused on ongoing non-compliance with the ELV for dust (particulates) at emission point A1 (see **CAR_NRW0032996**).

Sinter main stack (A1)

The sinter plant has two Electrostatic Precipitators (ESPs), each divided into two 'banks' of power fields:

- North ESP comprising two banks of three main power fields, each split into two secondary fields i.e. 12 fields in total
- South ESP comprising two banks of four main power fields, each split into two secondary fields i.e. 16 fields in total

The North ESP is newer than the South ESP and it has a different (dual) wind main design. Both ESPs remove dusts of varying resistivity from the sinter flue (waste) gas stream.



Tata Steel explained that the North ESP had lost fields 5A, 5B, 6B and more recently field 1B. Therefore, 8 out of 12 fields are currently operational, reducing ESP abatement capability by 33%. During the first week of September 2018 (Week 36) there will be a planned five-day sinter plant stop to allow the problems with the North ESP fields to be tackled. If the issues cannot be fully

resolved during this planned stop, the sinter plant may restart in 'single fan' mode of operation to allow the North ESP to remain offline.

Optimisation of both ESPs has been hampered because of ongoing sintering process instability which makes empirical analysis of performance difficult. Despite this, optimisation work has started on North ESP fields 3-6 and South ESP fields 7 & 8. During Week 29 of Tata Steel's sinter plant recovery plan, new Continuous Emission Monitoring Systems (CEMS) will be installed upwind and downwind of both ESPs. This will allow ESP performance to be assessed and make optimisation easier. To improve sintering stability, Tata intend to change the granularity (permeability) of the raw sinter blend by using a modified sinter drum.

The maintenance strategy for the ESPs has been reviewed. Each ESP will now be taken offline for one week in every calendar quarter, during which time the sinter plant will be operating in single fan mode. The interior of each ESP is subject to continual physical abrasion by entrained dust, which progressively wears away exposed surfaces and parts. An engineering consultant is reviewing the condition of both ESPs and is providing advice to inform Tata's maintenance strategy.

Commissioning of the lignite-lime injection system has been delayed due to the condition of the ESPs and sinter waste gas system. To get lignite-lime injection operational, oxygen (O₂) levels must not exceed 17% within the ESPs. Oxygen ingress (into the system) has been a persistent issue. The double-dome valves at the base of each ESP dust collection hopper have, after a period of airtight operation, suffered from degraded valve seals. Tata Steel has a new maintenance strategy for these important components. There are seven pairs of valves and one pair is now replaced every three weeks. It takes approximately 18 hours to remove and replace a pair of valves. The removed pair are maintained and are kept ready to be used as replacements for the next valve change over.

Tata has reviewed its maintenance strategy for the sinter plant wind mains. An information gathering exercise has shown that similar sinter plants elsewhere replace about 10% of the wind main every year. Port Talbot's engineers are working to a similar plan going forward with further wind main replacement work planned over the next few years. This plan considers logistical and practical difficulties such as limited heavy plant access and difficult crane lifts, which impact project timescales.

The level of chloride in the dust entrained within the sinter waste gases is known to affect ESP dust capture. Tata have been looking at trials using low-chloride and chloride-free sinter blends. A contractor is being employed to wash blast furnace gas cleaning system and sinter ESP 'reverts' - dusts which are known to be high in chloride – before returning them to the raw sinter blend. Analysis of dusts collected from different ESP fields has shown that chloride is present in all fields to varying levels: less so in dusts from the earlier fields, and consistently higher amounts from dust captured by the later fields. The final power field has tended to suffer from high chloride build-up and stubborn alkaline deposits which the rapping system cannot easily remove. These deposits need to be removed manually from within the ESP.

Tata has considered an approach which would produce substitute furnace pellets (feedstock) using sinter reverts and blast furnace flue gas cleaning dusts. Tata has reviewed the use of high chloride containing materials in furnace pellets without any washing to reduce the chloride levels. This approach could cause operational problems within the furnace. The potential benefits of using sinter reverts and furnace dusts are likely to be outweighed by the practicalities (large treatment volumes) and low net removal of chloride from the ironmaking process. Tata's lignite-lime supplier is due on site in October 2018 to review and pre-commission the system. Optimisation is scheduled for March 2019. The current work streams aim to have the ESPs fully optimised for particulate capture and lignite-lime injection by April 2019.

If air (O₂) ingress continues to be a problem, Tata Steel could consider other methods of pollutant

adsorption such as the use of Minsorb - a type of adsorptive lime manufactured by L'Hoist:
<https://www.sorbacal.com/en/our-product-range#!/dx>

The numbering of each set of ESP power fields requires further clarification. NRW's officers now need to visit the sinter plant to understand the ESPs and power field configuration in more detail. Tata Steel is requested to provide suitable dates for a site visit.

Compliance assessment

Continued notified exceedances (breaches) of the permitted ELVs for particulates at emission point A1 in 2017/18 have been assessed and scored in accordance with NRW's Compliance Classification Scheme (CCS). This assessment is conducted on a quarterly basis and is recorded in separate CAR forms.

In our previous report we outlined the potential use of an EPR Regulation 61 Information Notice in response to ongoing permit non-compliance. This approach has also been used by the Environment Agency in respect of similar ongoing permit non-compliance at Scunthorpe steelworks. The inspecting officers confirmed it was NRW's intention to issue an Information Notice to Tata Steel UK Ltd in relation to Port Talbot's sinter plant main stack particulate emissions.

Following this intervention, an EPR Regulation 61 Information Notice was sent to the Tata Steel UK Ltd Company Secretary on 18 July 2018. The Notice requires the company to provide the information outlined in Schedule I by 18 August 2018.

Coke Ovens

Morfa Coke Ovens heats coking coals in the absence of oxygen to produce high-quality coke which is used at the sinter plant and the blast furnaces. Coke Oven Gas (COG) generated within the ovens is purified and used as a fuel across the steelworks.

At Port Talbot there are two batteries of 42 ovens each (84 in total) and ten permitted emission points:

1. Morfa Coke Oven batteries (A54)
2. Morfa main stack (A55)
3. Ministerstein coke-side fume hood (A56)
4. Ammonia incinerator (A57)
5. Secondary coal crusher stack (A58)
6. Coke Oven Gas (COG) triple flare stack (A59)
7. Coke quench tower (old) (A60B)
8. Coke quench tower (new) (A60B)
9. COG collecting main bleeder valves (A61)
10. COG flare stack (A67)

NRW has undertaken a programme of targeted inspections focusing on emission point A54 and ongoing non-compliance with the ELVs for visible dust emissions from coke oven doors, tops and charging activities (see **CAR_NRW0032996**).

We have recently expanded our coke ovens assessment to include black push emissions. These are discussed in more detail below.

Coke oven doors

Each of the 84 coke ovens has two main doors and one smaller leveller door (ram side), giving a total of 252 doors that could leak.

As part of Tata Steel's 'Unleash and Engage' initiative, and an ongoing drive for sustainable operational excellence (SOE), the works area engineers have been empowered to take ownership

of the door leaks issue with increased operational support from the wider business. This revised approach has contributed to an improved picture for coke oven door emissions. Recent monitoring shows that Tata has complied with the permitted Door Leakage Control Factor (DLCF) – and therefore the BAT-Associated Emissions Performance Level (BAT-AEPL) – for the last eight consecutive weeks. Battery 1 is leading this improved performance.

Tata Consulting Engineers (TCE) are looking at the feasibility of retrofitting new types of door seals to the existing door frames. A trial for Morfa Coke Ovens – possibly focusing on five battery end ovens – is being considered before any firmer commitments are made to this major change that could affect the coke and ram side equipment.

Coke oven tops

Coke oven 'tops' encompasses:

- the coal charge holes (and lids) located on top of each oven; and
- the assembly of pipes, spigots, goosenecks and caps which forms the offtake system connecting each oven to the COG collection main.

Morfa Coke Ovens has dual COG collection mains running the length of both batteries. There are hundreds of individual emission points falling under the definition of coke oven tops.

Tops leakage rates are related to gas pressure control across both coke oven batteries. When coal is charged into an oven, the gas released reaches maximum volume and then gradually reduces as the coal is carbonised. Port Talbot's gas pressure controllers react to changes in gas production and respond to regulate the pressure in the ovens to a set point. This approach offers reliable pressure control, but it can create pressure spikes or surges resulting in emissions.

At Tata Steel's Ijmuiden steelworks in Holland, pro-active or 'forward' gas pressure control is used. This technique adjusts gas pressure before an oven is charged. The forward control approach uses pre-set parameters so that pressure spikes are less frequent. Port Talbot's pressure control system requires modification before this technique could be implemented. Oven pressure levels and alternative pressure control systems are being studied by Tata Consulting Engineers.

Tata's engineers have carried out a Pareto analysis of leaks associated with coke oven tops. The main (leak) offenders are the spigot joints. Spigots are now being tackled as a priority and a dedicated shift contractor is now in place to provide 24/7 support to each repair team.

Currently Battery 1 is outperforming Battery 2 in the control of leaks from coke oven tops; however, the figures for both batteries are much more closely aligned than the equivalent data for coke oven doors. Good progress is being made, but there remains work to be done to achieve compliance with the challenging BAT-AEPL of 1% leakage (99% no leaks).

Looking further ahead, Tata Steel has initiated a feasibility study for a single COG collection main at Morfa Coke Ovens. Most coke ovens use a single gas main, whereas Morfa has dual mains with gas extracted at each end of the batteries. The system then converges, and raw COG is drawn into the by-products plant inlet by a single exhaust fan.

Tata should review its tops leakage data to project the consequences of moving to a single COG collector main. An estimation of BAT-AEPL compliance could be achieved by using the worst collector main leak results to inform this exercise.

Coke oven charging

Coal is automatically charged into each oven every 18-24hrs. Visible emissions from charging should not exceed 30 seconds per charge expressed as a monthly average value.

Compliance with the BAT-AEPL for charging emissions is not being achieved at present.

However, all four charging 'telescope' nozzles have now been replaced and Tata's attention has turned to the seals where the nozzle connects with the oven charge holes. These seals are due to be replaced within 3-4 weeks.

This final set of improvements should ensure the nozzles 'seat' correctly into each charge hole, reducing the emissions from this activity. Further data i.e. monthly average results are necessary to measure progress and assess the impact of these improvements.

Black pushes

Poor carbonisation within a coke oven can result in a pulse of dark smoke (fume) when the hot coke is pushed by the ram into the waiting coke car.

There are two main considerations where black pushes are concerned:

1. Ensuring coal achieves full conversion into coke by heating it consistently across the profile of each oven. The coke side of an oven generally has more coal to carbonise than the ram side, so more heat needs to be applied on the coke side flues than on the corresponding ram side flues. This places greater pressure on this part of the system. Also, ovens towards the end of each battery suffer greater heat loss and thermal instability than those towards the battery centre. Tata have been taking contiguous blocks of 4-5 ovens offline to repair the gas flue distribution systems and improve their heating profile. Currently, four such repairs are planned annually i.e. between 16 and 20 ovens. 'Problem' ovens are reviewed weekly to assess their performance. Coking time can be extended from 18 to 24 hours to reduce the pressure on vulnerable parts of the flue (regen) system.
2. Ensuring fumes and dust are captured properly when an oven is pushed. Tata has commissioned the design of a new fume capture system or 'hood' that will improve environmental performance for the duration of oven pushes, including during filling of the coke car. Project delivery is anticipated to be 12 months. Tata's new ram-side collection and spillage system is now in place. Coke car automation is also being pursued so that the car operates remotely and simultaneously with the ram (and hood).

Compliance assessment

Continued notified exceedances (breaches) of the permitted ELVs for visible emissions at emission point A54 in 2017/18 have been assessed and scored in accordance with NRW's Compliance Classification Scheme (CCS). This assessment is conducted on a quarterly basis and is recorded in separate CAR forms.

In our previous report we outlined the potential use of an EPR Regulation 61 Information Notice in response to ongoing permit non-compliance. This approach has been discussed in relation to sinter plant main stack emissions (see above). The inspecting officers confirmed it was NRW's intention to issue an Information Notice to Tata Steel UK Ltd in relation to visible emissions from coke oven battery doors, tops and charging activities.

Following this intervention, an EPR Regulation 61 Information Notice was sent to the Tata Steel UK Ltd Company Secretary on 18 July 2018. The Notice requires the company to provide the information outlined in Schedule I by 18 August 2018.

It is acknowledged that good progress has been made in relation to emissions from coke oven doors and NRW welcomes the most recent set of results demonstrating compliance with the BAT-AEPL.

A technique utilising cameras fitted with LIDAR technology to monitor local industrial emissions was discussed. This would require additional study (including baseline measurements) and investment.

We agreed that an updated Schedule 5 Part B notification will be submitted to NRW presenting a

narrative outlining how many door frames, spigot joints, ascension pipes, charge holes etc. have been repaired or upgraded by Tata Steel. Including these running totals would add context and better explain the scope of work necessary to deal with ongoing exceedances at A54. The updated Part B should be submitted to the regulator by 28 September 2018.

Fugitive dust management and control

Since the beginning of May 2018, NRW has received numerous reports of dust fallout affecting residential areas near Port Talbot steelworks. We understand that Tata Steel has also received a high number of complaints about this issue.

Tata Steel presented a range of measures being taken across the steelworks to minimise fugitive dust from its activities. These include (but are not limited to) increased use of water bowsers, damping down of stockpiled material using fog cannons and minimising unnecessary movements of raw materials. Tata is also pursuing its own monitoring and analysis of dust samples obtained from outside the steelworks permitted installation boundary.

A technique using coloured (latex) dust suppressant sprays for raw material stockpiles was discussed. This could clearly indicate which stockpiles require further application of dust suppressant.

The prolonged period of dry, hot weather across the United Kingdom this summer has led to water supply and distribution issues at parts of the steelworks. Certain areas are suffering from lower water pressures because of an increase in bower filling points and their frequency of use. Tata's engineers are rebalancing the system, but it remains difficult to match water supply with current demand.

All measures being taken by Tata Steel are included within an integrated dust management plan for the steelworks. At the time of inspection, we were shown a working copy of this 'live' document. NRW now requires Tata Steel to formally outline the measures the company is taking to deal with environmental complaints, explain how it is engaging with local communities and confirm the steps being taken across the steelworks to control and minimise fugitive emissions. This should be submitted in writing by 31 August 2018, or as otherwise agreed in writing with the regulator.

Other matters

Tata Steel asked NRW for clarity on the regulation of blast furnace slag granulation at No.5 Blast Furnace. Slag granulation is undertaken on behalf of Tata Steel by its contractor Cambrian Stone Ltd (a subsidiary of Tarmac).

The ability to condense fume from the No.5 Granulation Tower has not been restored since part of the tower was replaced with an exhaust stack in 2015. The exhaust stack was agreed as a short-to-medium term solution after Tarmac discovered significant structural deterioration affecting the outer shell of the tower. The condensing unit had to be removed when the outer tower shell was dismantled.

BAT 69 within the published Iron and Steel BAT Conclusions (2012) states:

BAT for minimising slag treatment emissions is to condense fume if odour reduction is required.

NRW previously agreed to Tarmac's approach on condition that the operator would restore the ability to condense fume in the longer term e.g. during an extended blast furnace repair or re-line.

NRW will now review this matter with Cambrian Stone (Tarmac) and we will update Tata Steel on the outcome of these discussions. Further dialogue with Tata Steel personnel may be needed to agree a common strategy for No.5 Granulation Tower.

Conclusions and further actions required

Sinter plant main stack

Continued notified exceedances (breaches) of the permitted ELVs for particulates at emission point A1 in 2017/18 have been assessed and scored on a quarterly basis in accordance with NRW's Compliance Classification Scheme (CCS).

The inspecting officers confirmed it was NRW's intention to issue an **EPR Regulation 61 Information Notice** to Tata Steel UK Ltd in relation to Port Talbot's sinter plant main stack particulate emissions. Following this intervention, an EPR Regulation 61 Information Notice was sent to the Tata Steel UK Ltd Company Secretary on 18 July 2018. The Notice requires the company to provide the information outlined in Schedule I of the Notice by 18 August 2018.

The numbering of each set of ESP power fields requires further clarification. NRW's officers now need to visit the sinter plant to understand the ESPs and power field configuration in more detail. Tata Steel is requested to provide suitable dates for a **site visit**.

We consider that the previously identified action in respect of high-chloride sinter and blast furnace reverts has now been addressed by Tata Steel.

Coke Ovens

Tata Steel has made further progress towards compliance in relation to fugitive emissions from Morfa Coke Ovens. The BAT-AEPL for coke oven doors has recently been met for eight consecutive weeks.

Continued notified exceedances (breaches) of the permitted ELVs for doors, tops and charging emissions at emission point A54 in 2017/18 have been assessed and scored in accordance with NRW's Compliance Classification Scheme (CCS). This assessment is conducted on a quarterly basis and is recorded in separate CAR forms.

The inspecting officers confirmed it was NRW's intention to issue an **EPR Regulation 61 Information Notice** to Tata Steel UK Ltd in relation to emissions from coke oven battery doors, tops and charging activities. Following this intervention, an EPR Regulation 61 Information Notice was sent to the Tata Steel UK Ltd Company Secretary on 18 July 2018. The Notice requires the company to provide the information outlined in Schedule I of the Notice by 18 August 2018.

NRW requires an **updated Schedule 5 Part B notification** presenting a narrative outlining how many door frames, spigot joints, ascension pipes, charge holes etc. have been repaired or upgraded by Tata Steel. Including these running totals would add context and better explain the scope of work necessary to deal with ongoing exceedances at A54. The updated Part B should be submitted to the regulator by 28 September 2018. Note that this replaces the previously identified similar action in CAR_NRW0032996.

Fugitive Dust Management & Control

NRW and Tata Steel have received numerous reports of **dust fallout** affecting residential areas near Port Talbot steelworks since the beginning of May 2018.

Tata Steel presented a range of measures being taken by the company across the steelworks to minimise fugitive emissions from its activities. These measures are framed within a working, **integrated dust management plan** being developed by Tata.

NRW now requires Tata Steel to formally outline the measures the company is taking to deal with environmental complaints, explain how it is engaging with local communities and confirm the steps being taken across the steelworks to control and minimise fugitive emissions. This should be submitted in writing by 31 August 2018, or as otherwise agreed in writing with the regulator.

Other matters

NRW will review the status of No.5 Granulation Tower with Tarmac in the context of the BAT

Conclusions requirements. We will update Tata Steel on the outcome of these discussions. Further dialogue with Tata Steel personnel may be needed to agree a common strategy for this asset.

[ENDS]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033787**

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

Site	Port Talbot Steel Works	Permit Ref	BL7108IM
Operator/Permit holder	Tata Steel UK Limited	Date	11/07/2018

Section 3 – Enforcement Response

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.

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			
B1	X	Tata Steel is requested to provide suitable dates for a site visit to understand the sinter main stack ESPs and power field configuration in more detail.	28/09/2018
C2	X	NRW requires Tata Steel to formally outline the measures it is taking to deal with environmental complaints, explain how it is engaging with local communities and confirm the steps being taken across the steelworks to control and minimise fugitive emissions. This should be submitted in writing by 31 August 2018, or as otherwise agreed in writing with the regulator.	31/08/2018
E1	O	Respond to EPR Regulation 61 Information Notice by 18 August 2018	18/08/2018
E1	O	Respond to EPR Regulation 61 Information Notice by 18 August 2018	18/08/2018
G4	X	NRW requires an updated Schedule 5 Part B notification in respect of Morfa Coke Ovens (A54). The updated Part B should be submitted to the regulator by 28 September 2018. Note that this replaces the previously identified similar action in CAR_NRW0032996.	28/09/2018

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 (eg. 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 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 fifteen 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.