

Neath Port Talbot County Borough Council,
The Quays,
Brunel Way,
Baglan Energy Park,
Briton Ferry,
SA11 2G

12 April 2021

Our reference: Req14OpNoise
Your reference: [Your reference]

POWER PLANT EXTENSION REQUIREMENT 14: OPERATIONAL Noise

Introduction

Tata Steel is writing in response to Requirement 14 of the Development Consent Order (DCO) for the new Power Plant Extension at Port Talbot Steelworks. The Requirement seeks to manage operational noise from the Power Plant Extension project at Port Talbot Steelworks.

In line with the Requirement, and prior to commissioning of the plant, Tata Steel must set out a scheme for the management of noise from the operation of the plant. The scheme must detail how the impact will be limited on the local residents and other stakeholders in close proximity. The scheme must focus on three main areas: noise attenuation built into the plant design, noise monitoring requirements and measures that Tata Steel will undertake should there be any issues stemming from this particular plant.

Noise Attenuation Measures

The project has two major features designed to reduce the perceptible noise at residential properties.

The first design initiative aims to ensure noise reduction at source. The main generator for the steam turbine has a gearbox that can generate noise emissions. The design includes silencers

installed on the outlet to reduce the sound pressure level to 85 dB(A) at 1m from the gearbox housing.

The second design initiative seeks to reduce noise transmission. A composite cladding system has been used across the turbine hall, which is composed from Tata Steel Trisomet and Trimapanel. These panels have significant noise insulating properties across a wide range of frequencies. They have a weighted Sound Reduction Index (SRI) value of 28.5 dB(A).

Please see the table below for the formation on noise reduction at different frequencies for the Trisomet product (please note the Trimapanel has a very similar noise reduction profile with an weighted SRI of 28.9 dB(A)).

Frequency (Hz)	SRI Values (dB)*	Frequency (Hz)	SRI Values (dB)*
100	12.1	800	27.2
125	13.6	1,000	28.9
160	15.3	1,250	30.6
200	16.9	1,600	32.5
250	18.5	2,000	34.3
315	20.2	2,500	36
400	21.9	3,150	35.9
500	23.6	4,000	33.8
630	25.4	5,000	31.2

Weighted S.R.I RW = 28.5 dB

Noise Limit

It is proposed to set the noise limit at 5dB(A) above the ambient noise level, e.g. the noise of the steelworks without the addition of the new turbine.

Noise monitoring requirements (including location of monitoring equipment)

Tata Steel is already undertaking regular noise monitoring within the community around the works and will continue to do so throughout the life of the facility. This is designed to let us understand our impact on residents, other businesses and the environment in general.

The location of the monitoring points that will be used as part of the commissioning has been included in **Appendix A** of this report. These points mirror the monitoring conducted for the construction phase of the project and are protective of the communities near Mariner's Point, Prince Street and West End. Regular noise monitoring done as part of permitting requirements at the site is conducted at some but not all of these locations.

Monitoring will be undertaken using a B&K 2250 Serial number 2626234 Class 1 sound level meter, and will be performed by Tata Steel's in-house occupational health specialists. We have the potential to back these noise measurements with a second Norsonics sound meter should measurements be required at multiple locations simultaneously.

The commissioning is due to take 7 days and two sets of noise measurements will be taken, one near the beginning of the turbine optimisation and one towards the end. All three residential areas will be monitored to ensure that there is no significant impact on local receptors. One of the turbines that is currently operating has already been decommissioned but there are two more that are currently operational. The first of these two will be powered down one week prior to commissioning of the new system and the final one will be powered down approximately 2 or 3 days into commissioning. In order to get representative ambient noise monitoring data, monitoring will need to commence more than one week prior to commissioning starting. This will give three average noise values at the residential locations, once to capture ambient noise levels, once at the start of commissioning and once towards the end.

There is a possibility that these measurements will be disrupted by certain weather conditions, high winds will cause excess noise at the measuring location and therefore would not be representative of the noise generated by the plant. If weather conditions prevent the measurement of noise at the receptors, Tata Steel will be forced to measure noise next to the turbine and then calculate predicted noise levels at the receptors based on standard decibel reductions over distance.

Noise Monitoring and Environmental Permit

Given the nature of the steelworks and the road separating the steelworks and the residential properties to the North standard noise limits are not appropriate. For this reason, Tata Steel intend to monitor the sound levels immediately prior to commissioning and then during the

commissioning period. It intends to compare sound levels to that observed without the new turbine structures. This will give an accurate assessment of the additive impact of this project.

The proposed headroom in the noise limit is required due to the additive nature of noise generated by multiple large sections of plant in close proximity. It is likely that the turbine will be run in all conditions in order to test the operational parameters and therefore may produce different levels of noise throughout the commissioning period.

The main operation of the site will be governed by Tata Steel's Environmental Permit (EPR BL7108IM), which has provisions for operational noise emitted from the site. The relevant clause is listed below:

“3.4 Noise and vibration

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

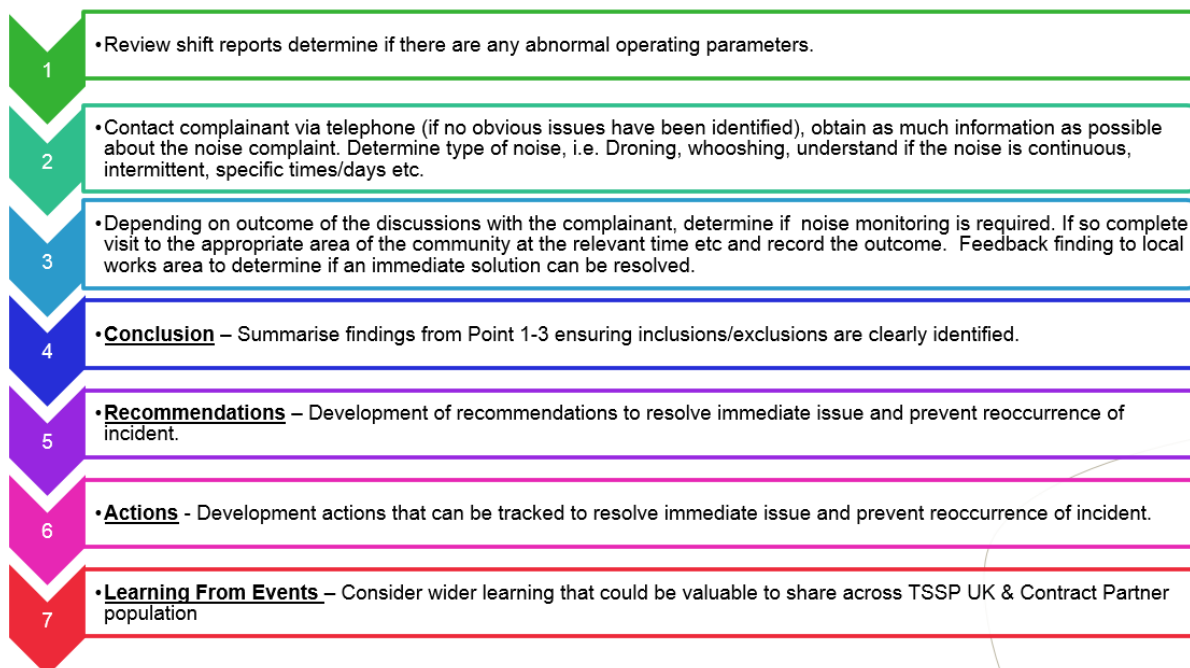
3.4.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;*
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.”*

Tata Steel will continue to adhere to its Environmental Permit and would not instigate specific noise level limits for the operation of the plant outside the commissioning period.

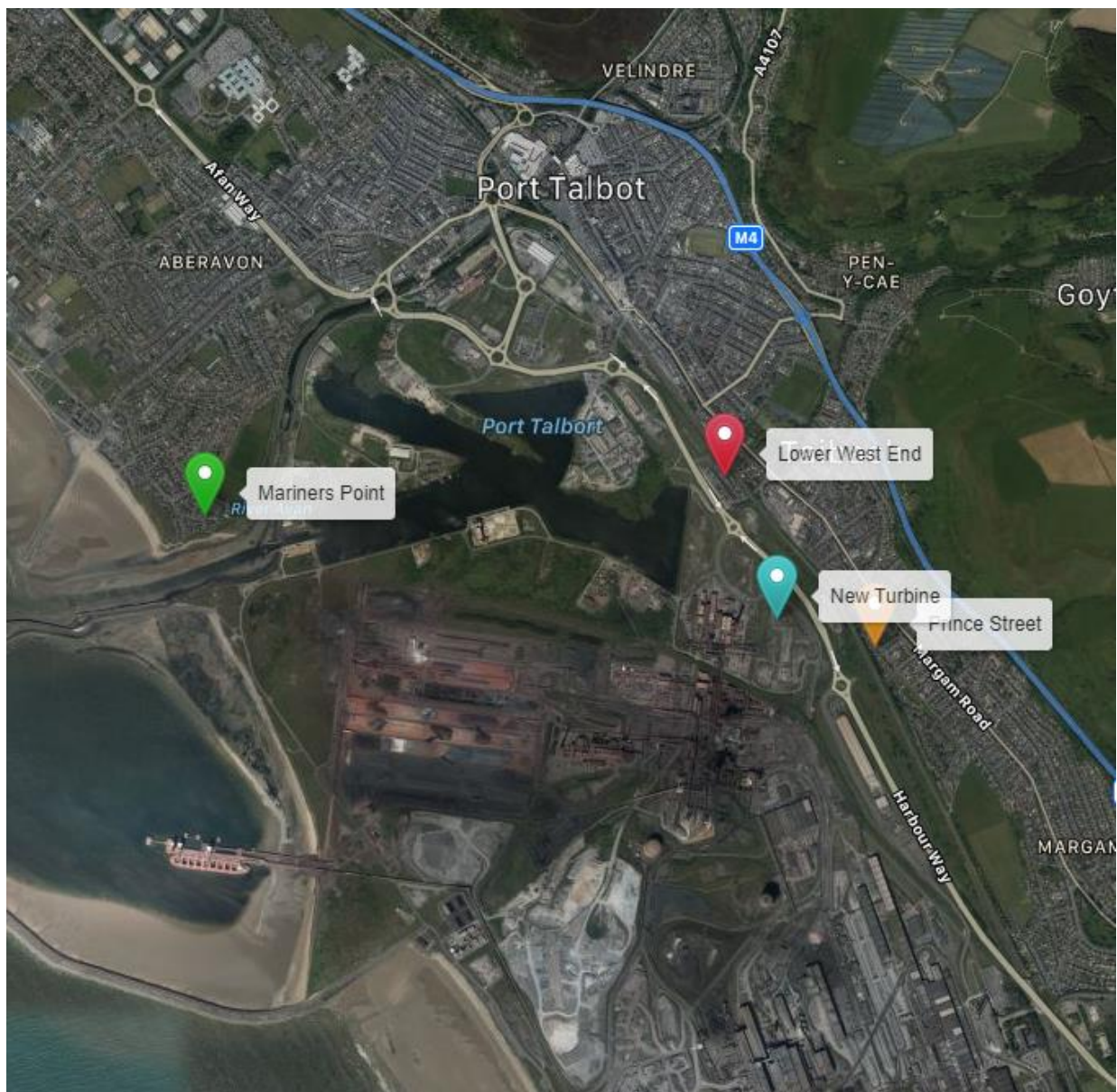
- Measures to be taken, including timescales to address any noise issues.

Monitoring will be undertaken twice during commissioning and compared to ambient noise measurements as described previously. If complaints are received from local residents or other companies in the local area, Tata Steel have a very robust complaints procedure in place. This procedure has been formalised with NRW and any complaint is investigated based on a number of factors. The feedback from this process can potentially justify significant changes to the plant in order to mitigate impact on residents. The current policy can be found in Appendix B and the flow diagram for specifically dealing with noise complaints can be found below:



Appendix A

Location of Sampling Points



Appendix B

Environmental Complaints Handling Policy

ISO14001:2015 Core Procedure

6.1.1 Environmental Complaints Handling

Status: Current

Initial Circulation	<i>Other Departments</i>
Gareth Symons	Debbie Boyce
Claire Grainger	Hayley Jeramiah
Nathan Ace	Hannah Powell
Lee D Williams	Matthew Bradwell
Beverley Jenkins	Robert Sydenham
Georgina Brooks	Regina Simmons
Morgan Livingstone	Geoff Stanford
Andrew Townsend	Susan Jones
Angharad Llewelyn	
Jason Massey	
Mark Clayton	
Paula Jones	

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Date:	23/11/20	
Author:	<i>Beverley Jenkins</i>	<i>Lead Environment Engineer</i>
Checked By:	<i>Nathan Ace</i>	<i>Environment Manager</i>
Approved By:	<i>Nathan Ace</i>	<i>Environment Manager</i>
Next Review Due:	November 2021	

Works / Area	EMS Clause(s)
Tata Steel Strip Products UK	6.1.1

1) Overview & Scope

Description
Overview / Objective The purpose of this document is to describe how environmental complaints from members of the public, internal employees are handled, investigated, and communicated.
Scope This procedure is applicable to environmental complaints received to the manufacturing sites within TSSPUK.

2) Responsible Persons

Responsibility	Responsible Person (TSSP UK)
Manager Environment TSSPUK (with support from Lead Environmental Engineers) - To ensure that complaints handling, investigations, & communications are carried out according to this procedure	Environment Manager
Environment Assistant to monitor, allocate and input necessary detail in the Environment Complaints system. All necessary letters to be controlled by the Environment Assistant.	Environment Assistant
Environment Engineers and Fire and Environment Managers - To complete all allocated complaint investigation and determine root cause where able.	Environment Engineers Fire and Environment Managers

3) Procedure

The following procedure describe the steps to be taken in the event of a complaint at Port Talbot or Llanwern:

Telephone communications to Port Talbot works from external sources regarding the environment are via a Call Centre on 0800 138 6560.

Contact to this number is logged by Connect Assist directly into the Environmental Complaints Database

<http://environmentalcomplaintssystem.eu.tatasteel.com/Report/ReportsTab>

These are checked regularly throughout the day by the Environment Assistant.

All NRW complaints are emailed to the 'Community Support' e-mail address - community.support@tatasteeleurope.com

As per telephone communications, these are checked regularly by the Environment Assistant, and entered onto the Environmental Complaints Database

Members of the public may log complaints electronically via Tata Steel's Online complaint

form - <https://www.emailmeform.com/builder/form/5C3bdi92geeEA7s4TNJv0jna>

As per telephone communications, these are checked regularly by the Environment Assistant, and entered onto the Environmental Complaints Database

Internal employee complaints are logged via Security.

All complaints are discussed in the Environment Team Daily Stand-Up Meeting (DSUM) and disseminated for investigation in the Environment Team Weekly Stand-Up Meeting (WSUM). All meetings are currently held electronically due to the COVID-19 situation.

Complaints are allocated to the relevant personnel on a weekly basis in the Environment Team WSUM. The team will determine if the complaint is categorised as a multi-source event, a single source event or if an event investigation report is required.

Multi source event definition

Clear indication from EnviroSuite that the trajectory report determines there is more than one works area process/processes affecting the community.

Single source complaint definition

Clear indication from EnviroSuite that the trajectory report determines there is clear correlation that only one works area's process/processes affecting the community.

Event Investigation definition

>3 complainants

All complainants' properties located within a mile radius of each other's properties.

All complainants have complained about the same type of issue, i.e., if the complainants are referring to a different type of issue such as fallout and noise this is not classified as the same type of event.

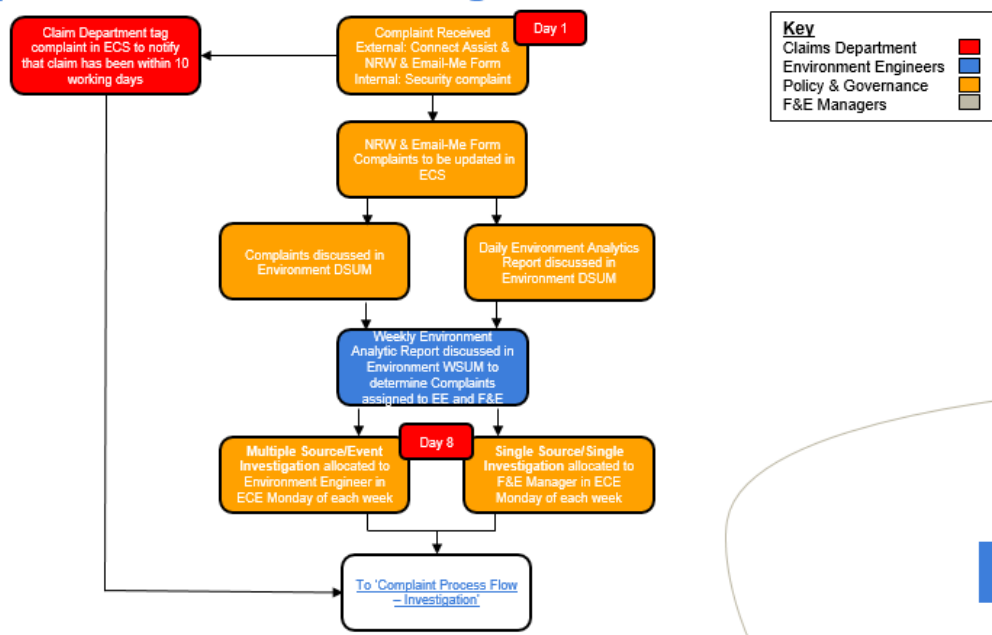
All complainants reference the same period of event. (Within a 24-hour period is acceptable)

Direct Complaints Management Process

At the request of their Legal Counsel, it is not possible to contact complainants who are part of a joint party litigation without the complainant's written consent. Those complainants who make direct contact with Tata Steel will be written to requesting authorisation to engage with them.

Refer to Complaints Flow diagram below for subsequent complaint assignment process

Complaint Process Flow - Assignment



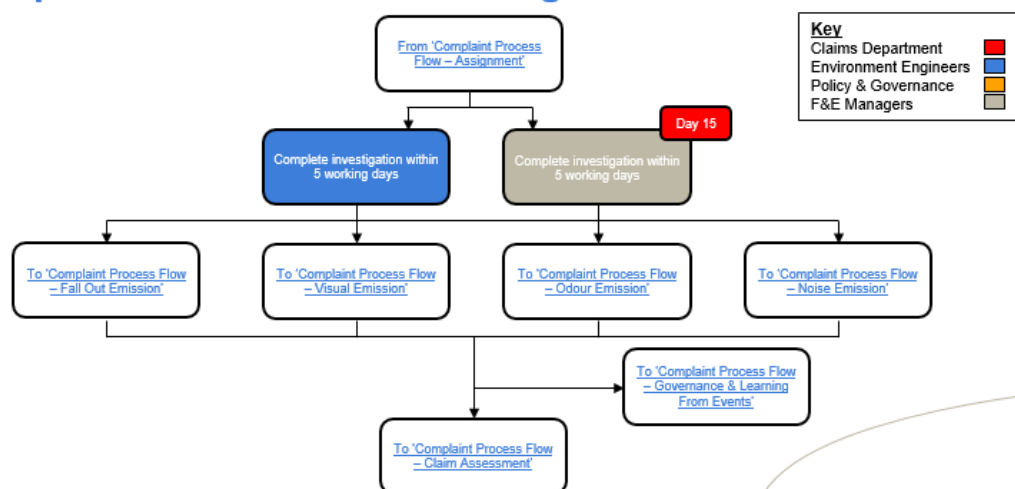
There are 4 types of potential complaints that may be submitted to Port Talbot or Llanwern, each complainant type requires an investigation.

A standard has been created outlining the key data sources to be review when completing an investigation ([Please see link to standard operating procedure](#)).

Recommendations/conclusions will be extracted from the investigations and reviewed accordingly in local and area meetings. If applicable the learning from events process will be followed.

* Refer to Complaints Flow diagram below for subsequent complaint assignment process.

Complaint Process Flow - Investigation



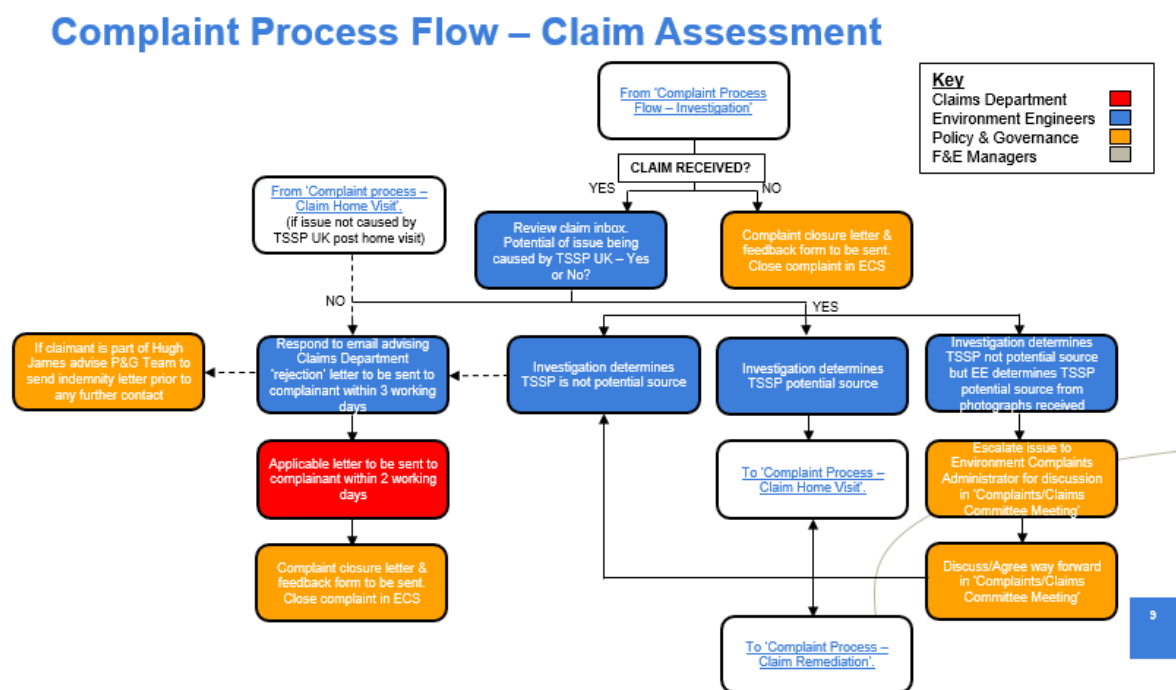
Once the investigation has been completed, the claims inbox will be reviewed to determine if a claim has been received, if a claim is not received within 14 days the claim will be closed. If the claim is received and it's determined that the complaint can be attributed to TSSPUK, and it's deemed that appropriate remediation is necessary, this will be discussed in the claims committee weekly meeting.

The claims department will liaise with TSSPUK specialist contractor to ensure that the necessary remediation is completed. In a small number of cases compensation is required and this will be discussed and agreed in the weekly committee meeting.

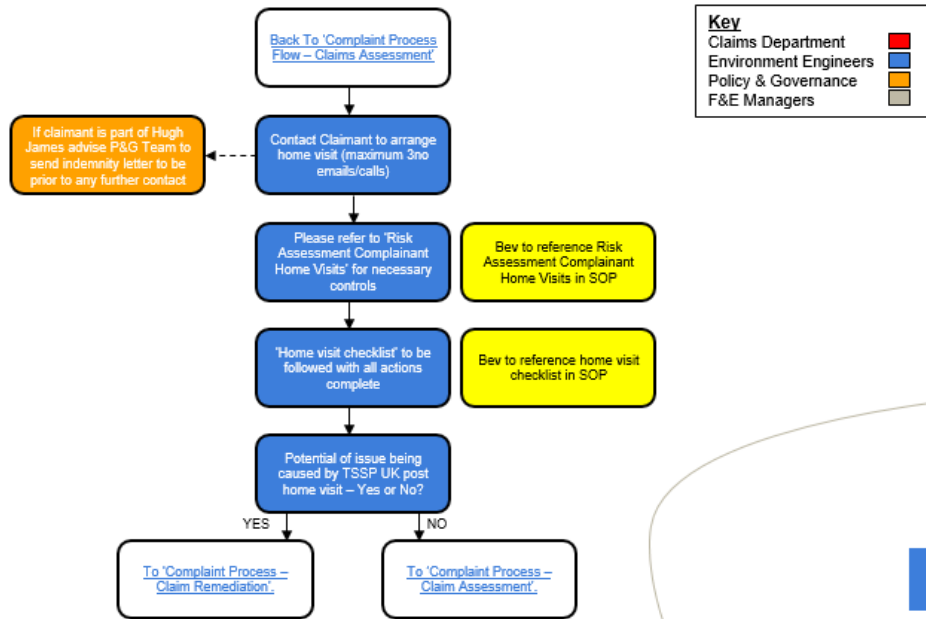
There may be occasions whereby a home visit is required, claims will ordinarily be assessed via photographs from the claim's inbox, but if circumstances outlined in the safe operating procedure ([See link](#)) require a property visit, a risk assessment and the home visit checklist must be completed.

After the necessary course of action, a closure letter will always be sent to the complainant, however if the source of the complainant is not as a result of TSSPUK processes the claim will be rejected and the complainant will receive a notification of closure of the claim from TSSPUK.

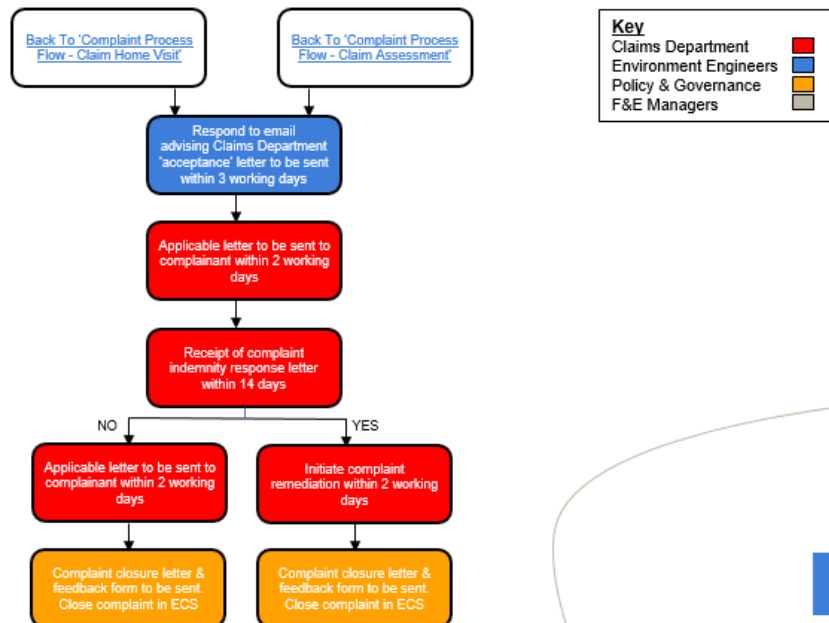
- * Refer to Complaints Flow diagrams below for subsequent complaint assessment through to the claim remediation stage.



Complaint Process Flow – Claim Home Visit



Complaint Process Flow – Claim Remediation



Government 'Lockdown' Measures due to Virus Pandemic

When home visits to complainants are restricted due to Government imposed 'lockdown' measures, the complainants will be contacted by telephone instead. If a complainant wishes to make a claim (e.g., for dust fallout on their vehicle or property) then photographic evidence

will be requested to be submitted via email to the Claims email inbox. Where email is not possible, then alternative arrangements (e.g. by post) will be discussed and agreed on a case-by-case basis.

All complaints via the NRW will be responded to during the quarterly review meeting, unless NRW expressly ask for specific feedback on individual complaints to be provided.

In addition, following investigations, the nature, and source of complaints are presented for discussion at the site wide annual Management Review.

Complaints issues and trending should be reviewed in works area ISO14001 PDCA meetings.

The Environmental Complaint Investigations are held on the Environmental Complaint Database. The maintenance of these records and their associated follow up actions are the responsibility of the Environment complaints administrator and the Environment Engineers/Fire and Environment Managers to whom the complaints are assigned.

The Environment Team will also review complaint numbers daily at the Environment Team DSUM. The number of complaints is escalated on a daily basis to the Safety Health and Environment manager who in turn will escalate to the Hub Director.

On a quarterly basis the Environment Manager will meet with NRW to review complaints performance, which subsequently feeds into the NRW complaints communications process.

Governance of process

To ensure that the correct processes are followed, within the Environment Team WSUM, a process confirmation schedule has been created allowing the team to process confirm team members complaints to ensure that everyone is adhering to the standard investigation template.

4) Records & Associated Documentation

Record / Document Description	Link / Reference & Location

Revision Log	Change Details
1	New Document
2	Process updated along with flow charts
3	Updated in-line with COVID-19 government measures