

Mr. Nick Price  
Tata Steel UK Ltd  
Tata Steel Colors  
Shotton Works  
Deeside  
Flintshire  
CH5 2NH

**Our Ref: PAN-017868  
Other Ref: EPR-BR7321IK/V008**

**Date: 24 August 2022**

Dear Mr. Price,

**We need more information about your application**

**Application Reference: PAN-017868 (EPR/BR7321IK/V008)  
Operator: Tata Steel UK Ltd  
Facility: Tata Steel Colors, Shotton Works, Deeside, Flintshire, CH5 2NH**

Thank you for your application, submitted to us on 26 April 2022. Unfortunately, we need to ask you for some more details before we can consider duly making your application. The additional information required is summarised below.

**Form C2 – Non-technical Summary**

Q2b. We require a more detailed description of the changes you are proposing and why. Within the non-technical summary submitted, you have stated that due to improved flow and pressure control, abatement is no longer required for emissions extracted from the prime and finish quenches (emitted through the existing stack (A12)). Please provide further details as to why the existing abatement unit (RTO) was required initially and is now considered redundant. If this relates to replacement of old equipment with more efficient units please provide further details.

**Form C2 - Environmental Management System**

Q3d3. In support of a normal variation application, NRW require you to submit a summary of your existing Environmental Management System (EMS). Please provide a summary as well as an updated C2 form with this question answered.

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Correspondence welcomed in Welsh and English

### **Form C2 - Environmental Risk Assessment**

Q6. In support of a normal variation application, NRW require you to submit an Environmental Risk Assessment (ERA) which describes the environmental risks posed by the changes you are seeking to implement. The purpose of the ERA is to demonstrate that the impacts from your proposed changes will be acceptable. Please provide an ERA as well as an updated C2 form with this question answered. Please refer to the Environment Agency's guidance (which NRW also follow) on what we expect from the ERA. [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit)

### **Form C3 Operational Techniques**

Q3a. NRW require you to submit information describing the standards and measures to be implemented, in order to control the risk of pollution from the changes proposed to your process. This should include an assessment against Best Available Techniques (BAT) to explain how you will comply with relevant indicative BAT for your sector. Measures described should include proposed changes to your monitoring plan under normal operations, as well as any changes to managing accidents and emergency scenarios. Please provide details of your operational techniques as well as an updated C2 form with this question answered.

### **F1 Form: Section 1**

We have not been able to find evidence of payment of the application fee. The charging multiplier used to calculate your application fee is also incorrect. The Opra profile submitted in support of the application (V1 issued 2015) has since been superseded by V2 issued in 2019. The correct multiplier for a normal variation is 58, as outlined in our current charging scheme page 48 ([EP Charging Scheme 2022-23](#)). The application fee is therefore calculated as  $126 \times 58 = \text{£}7,308.00$ . There is thus an outstanding fee of  $\text{£}126.00$  required. Please pay the outstanding fee and provide confirmation of both the original and subsequent payments.

### **F1 Form: Section 7d**

The declaration on page 5 Section 7d of F1 Form has not been signed by a relevant person. 'Relevant Person' means (in the case of a company) a director, manager, company secretary or any similar officer or employee listed on current appointments in Companies House. [Companies House - Tata Steel UK Ltd](#)

If a manager or other employee intends to sign the declaration on behalf of the company, the F1 Form must be accompanied with a letter signed by a relevant person; that is, an officer of the company, confirming that the person has the authority to fill in the declaration.

Please re-submit the F1 form ensuring the declaration has been signed by a relevant person, and that you have completed all other relevant sections of the form.

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Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application and fee.

If you email or write to us, please quote the application reference **PAN-017868** on any correspondence and send it to the relevant address below. When we receive the missing items, we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions, please email me at [Lucinda.hall@naturalresourceswales.gov.uk](mailto:Lucinda.hall@naturalresourceswales.gov.uk).

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)  
Permitting Consultant Installations and RSR Permitting Team

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