TATA STEEL

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Tata Steel UK – Port Talbot Steelworks

Document Reference:	Additional information to support a substantial variation to Permit Number EPR/BL7108IM
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1. Form C2 Q3b1 (Technical ability)

Appendix 1 collates the relevant documentation showing evidence of original and continuing competence related to the operation of waste activities.

2. Form C2 Q3d3 (Summary of management system)

Tata Steel UK Limited (TSUK) has implemented an environmental management system (EMS) at Port Talbot that has been certified as meeting the requirements of international standard ISO14001 (2015). The certification was most recently reauthorised in October 2023 and the current certificate is included as Appendix 2.

Potential environmental risks associated with decommissioning the processes associated with blast furnace steelmaking were addressed as part of a comprehensive hazard study exercise prior to closing each plant. The EMS will subsequently be reviewed to reflect the changes in risk profile as a result of the decommissioning and, when appropriate, the additional risks associated with the EAF and other new or relocated processes.

The EMS changes are expected to affect:

- Aspects and impacts register
- Legal obligations
- Operational controls, including dust and emission management
- Monitoring and internal audit programme
- Training and awareness
- Emergency procedures

3. Form C2 Q5a (Site plans)

The site plan included in Schedule 7 of the current version of permit number EPR/BL7108IM is shown in Figure 1 below.

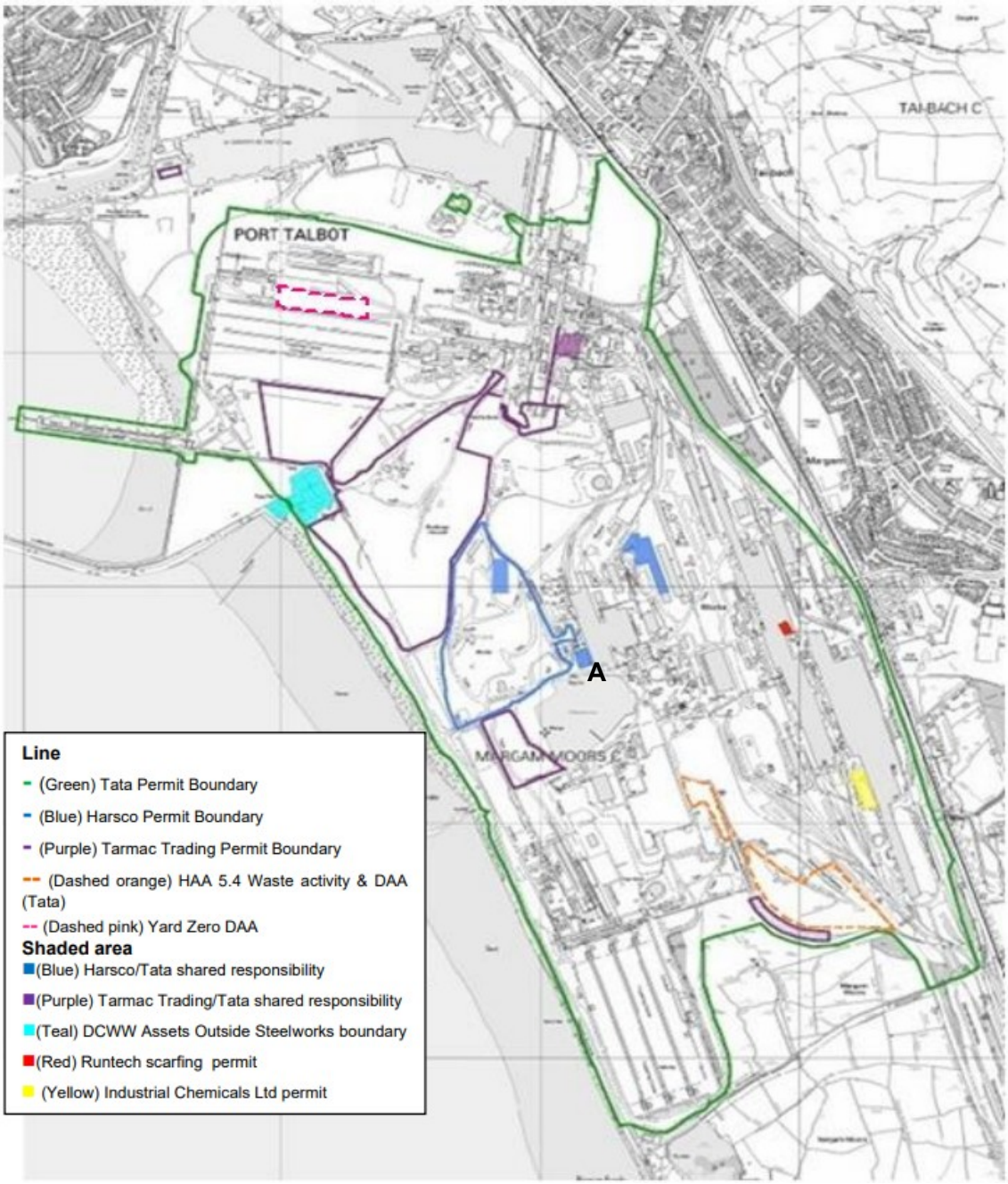

Figure 1: Site plan from existing permit

The transformation from the former integrated steelworks to an EAF-based installation will see significant changes to TSUK's operational footprint, but these will occur in a series of different phases, and some of the changes are still subject to discussion. No additional land will be brought into the overall Tata Steel permit boundary, shown in green above, but there will be some changes to the ring-fenced areas currently under the control of other contractors.

The yellow area on the site plan covering the Cold Mill effluent treatment plant (identified on the current plan as Industrial Chemicals Ltd, but brought back into Tata Steel control in November 2023) will be removed as this separate permit will be consolidated into the main permit.

Activities at the HAA and Yard Zero (dashed orange and dashed pink outlines on the site plan) will change as their primary purpose was to recover materials to be returned to the sinter plant or other now decommissioned processes on the site. These activities cannot in any case remain in their current locations, but no final decision on which parts of those operations, if any, will need to be relocated has yet been made.

Discussions are still ongoing with Harsco and Tarmac (blue and purple) to determine their future operational footprint. The blue area immediately to the west of the current steel plant (marked A on the site plan) will definitely change as the charging conveyor for the EAF will occupy this area in the future.

In addition, Tata Steel will, in the long term, give up control of some areas within the current permit boundary. Part of the land is leased from Associated British Ports (ABP) and this lease will terminate for the stockyards in 2026, entailing prior surrender of the parts of the permit associated with this area. Other parts of the land will fall outside the future operational footprint and have been designated as non-retained land. No specific plans for this land have yet been agreed, but surrender of the relevant parts of the current permit will be required before it can be released for other uses. Figure 2 outlines these areas.

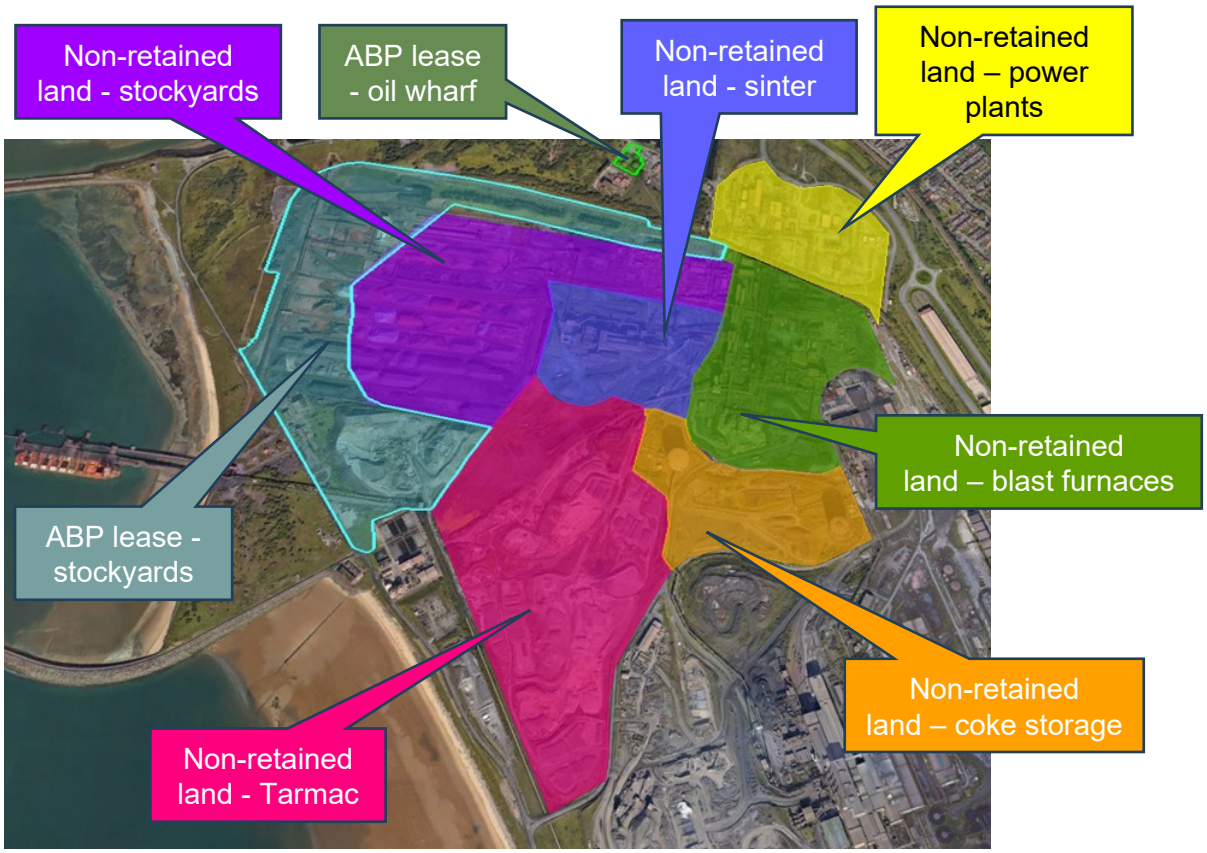

Figure 2: Areas of land leased from ABP and non-retained land

Finally, other areas within the current permit boundary may be ring-fenced in the future for contractor operations, under separate environmental permits, for activities such as slag processing.

4. Form C3 Q1a (Activities)

There will be significant changes in the activities to be included in the permit up to the point where the electric arc furnace (EAF) is commissioned in 2027, spread across a number of different phases.

The first phase of the changes will be removing references to the activities that have already been decommissioned as they are not required for an EAF-based steelmaking site – the coke ovens, sinter plant, the blast furnaces themselves and the existing steelmaking vessels. The on-site power generation plants relied principally on burning the excess process gases arising from the coke ovens, blast furnaces and steel plant, and without these fuels, the power plants have also been decommissioned and will be removed from the permit. The continuous annealing process line (CAPL) has also ceased operation and will soon be fully decommissioned and can be removed from the permit. The activity covering iron ore unloading and handling will also be removed from the permit as this is required only if more than 500,000 tonnes per annum are handled; less than that amount of material currently remains in the stockyards and will be sent off-site for use at other plants. These changes, including reference to the appropriate activities within the Environmental Permitting Regulations, will be detailed in a subsequent variation submission.

The EAF will be constructed within the current steel plant building to take advantage of other existing assets, so two of the continuous casters and two of the secondary steelmaking vessels (CAS2 and the RD degasser) have been mothballed rather than fully decommissioned. These assets will be recommissioned prior to the EAF commencing operation, but can be temporarily removed from the permit in the interim. The same is true of the burning booth in the caster workshop, which will be used for refurbishment of casting assets once the continuous casters are operational again.

Scrap steel arising from operations at the site has historically been stored and processed by a contractor (under a separate environmental permit) to meet the specifications required for internal consumption within the former steel plant. During the transition period until the EAF has been commissioned, scrap arising from ongoing operations will instead be sent for external recovery. There will still be a need to store such material on-site prior to collection, and to cut up large pieces to facilitate transport; these activities will be relocated from their current position to minimise the distances travelled across the site and to avoid interference with construction of the EAF and other associated facilities. Furthermore, the processing and storage operations will now be managed by Tata Steel rather than by the previous contractor and so this activity will be added to the Tata Steel permit.

Waste treatment activities at the HAA and Yard Zero will change as their primary purpose was to recover materials to be returned to the sinter plant or other now decommissioned processes on the site. No final decision has yet been made on whether some parts of these operations need to be retained and relocated elsewhere on the site.

Other activities in the existing permit will be retained as they are still operating during the transition period leading up to commissioning of the EAF:

- Reheating furnaces
- Hot rolling mill
- Pickle line
- Cold mill
- Package boilers (added to the permit in June 2024)
- Effluent treatment (except the biological treatment of coke oven effluent)
- Coal and coke handling (some material is still present in the stockyards and needs to be sent off site for use at other plants)
- Storage of intermediate or waste products

At an appropriate time, new activities will be added to the permit to cover at least the following:

- Electric arc furnace, ladle furnaces and associated materials handling system
    - To include recommissioning CAS2, the RD degasser, Caster 1, Caster 3 and the burning booth
- Scrapyard operations
- Pickle line (a new line to replace the existing one)
- Acid regeneration plant to work alongside the new pickle line
- New boilers or heaters to take the place of the package boilers currently on hire
    - To provide heating of the pickle baths (likely to be either hot water boilers or thermal oil heaters)
    - To provide process steam for the RD degasser
    - These are expected to amount to between 20 and 50 MW net thermal input in total, with no individual combustion unit exceeding 20 MW

There is the possibility of other new activities being added to this list, subject to further discussion within TSUK.

Separate variation applications detailing these changes will be made and Table 1a in Form C3 will be amended in phases through the transition period. When sufficient detail is available to undertake comprehensive risk assessments for new activities and assess each operation against appropriate technical standards, separate variation applications will be submitted.

5. Form C3 Q1b (Acceptance of wastes)

Some of the activities on site may continue to process wastes that arose whilst the blast furnaces and associated processes were in operation, but no new wastes will be accepted onto the site as part of any of the activities to be retained within the permit.

A trial waste treatment plant may be operated within the existing permit boundary under an R&D exemption (Schedule 1, Part 1, paragraph 3(c) of the Environmental Permitting Regulations) – further details of the trial plant will be provided before any such operations commence.

6. Form C3, Q2, Form C3 Q3a, Form C3 Q3b, Form C3 Q3c, Form C3 Q4a, Form C3 Q4b, Form C3 Q6a, Form C3 Q6b, Form C3 Q6c, Form C3 Q6d Form C3 Q6e, Form C3 Q7a, Form C3 Q7c

At this stage, these questions have not been addressed. Activities to be retained in the permit will continue to operate in line with existing standards, emission limits and other requirements. No new activities have yet been considered, as these will be subject to separate variation applications when sufficient detail is available to undertake comprehensive risk assessments and assess each operation against appropriate technical standards.