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by email only to alice.burrows@naturalresourceswales.gov.uk

30/04/2026

Our Ref: 024-1973 7 Steel NRW Response April 2026 REV00

Dear Alice,

Re: PAN-027968 7 Steel Furnace Replacement (Section Mill) – Notice requiring further information

Thank you for providing your request for further information via email (ref: PAN-027968) on 10/03/2026. This second response has been returned within the required period (*i.e.* on or before 05/05/2026), as agreed.

Our formal response is structured around the specific NRW requests.

Air Quality Assessment

NRW Request 1 – ACTION: Determine the background nutrient nitrogen deposition for the Severn Estuary SAC, SSSI and Ramsar and calculate the PEC.

NRW Request 2 – ACTION: Include non-statutory sites in the assessment of impacts.

NRW Request 3 – ACTION: Include impacts of PM2.5 on human health in the assessment.

A revised Air Emissions Risk Assessment (AERA) Ref. **15817B-10-R01-01-F-Air Quality** is provided as an attachment alongside an updated receptors file (Ref. **Receptors.asp**). Please note that the .asp file has been compressed (Ref. **Receptors.zip**) as the script file can be rejected by certain systems. We have also included the original full model package with the revised receptors.asp. file.

NRW Request 4 – ACTION: Provide an updated non-technical summary of impacts of emissions to air from the replacement furnace, including: a. impacts at the Severn Estuary SSSI, SAC and Ramsar b. the results of points 1-3 in this Schedule 5 notice.

A revised Non-Technical Summary (NTS) has been provided as an attachment (Ref. **024-1973 7 Steel Cardiff Variation - NTS Report REV01**).

Water Treatment Plant

NRW Request 5 – ACTION: Provide clarification regarding the emissions to sewer.

Response provided within **024-1973 7 Steel NRW Response March 2026 REV00**.

BAT Assessment

NRW Request 6 – ACTION: Provide the full BAT assessment.

Response provided within **024-1973 7 Steel NRW Response March 2026 REV00**.

Energy Efficiency

NRW Request 7 – ACTION: Confirm that the new furnace will operate under the following basic energy efficiency measures, in line with the guidance on “Energy efficiency standards for industrial plants to get environmental permits”: a. design your installation to be energy efficient using the techniques listed in section 3 of the Reference Document on Best Available Techniques for Energy Efficiency b. operate your installation within an energy management system like ISO 50001 or using the techniques in section 2 of the Reference Document on Best Available Techniques for Energy Efficiency (parts 2.1 to 2.8 and 2.10 to 2.17) c. maintain your installation within an energy management system like ISO 50001 or using the techniques in section 2 of the Reference Document on Best Available Techniques for Energy Efficiency (part 2.9 only).

Response provided within **024-1973 7 Steel NRW Response March 2026 REV00**.

Dust Management Plan

NRW Request 7 – ACTION: Provide a clear justification for not submitting a Dust Management Plan, such as has been done in sections 5.7 and 5.8 for Odour and Pest Management Plans.

Response provided within **024-1973 7 Steel NRW Response March 2026 REV00**.

I trust that the above information is satisfactory, but if you have any queries on this matter, please do not hesitate to contact me.

Yours sincerely,



Michael Sylvester
EAME Director

Annexe A: Schedule 5 Attachments

AERA Report – Ref. 15817B-10-R01-01-F-Air Quality

Receptor file – Ref. Receptors.asp [compressed file]

Full Air Model Files – Ref. Air Model files - Revised

Non-technical Summary – Ref. 024-1973 7 Steel Cardiff Variation - NTS Report REV01