

Natural Resources Wales Permitting Decisions

**Tata Steel UK Limited
(Port Talbot Steelworks)**

Decision Document

Draft for Consultation

Application for a Normal Variation

PAN-029148 COMPONENT 01

The application number is:	PAN-029148
The work package is:	PAN-029148.1 (Component 01)
The permit variation number is:	EPR/BL7108IM/V019
The applicant / operator is:	Tata Steel UK Limited
The Installation is located at:	Port Talbot Steelworks, Port Talbot, Neath Port Talbot, SA13 2NG
Consultation commences on:	19/10/2026
Consultation ends on:	13/11/2026

Purpose of this document

We are minded to issue the variation for Port Talbot Steelworks operated by Tata Steel UK Limited.

This draft decision document:

- explains how the application (V019) has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the draft permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

The document is in draft at this stage, because we have yet to make a final decision. Before we make this decision we want to explain our thinking to the public and other interested parties, to give them a chance to understand that thinking and, if they wish, to make relevant representations to us. We will make our final decision only after

carefully taking into account any relevant matter raised in the responses we receive. Our mind remains open at this stage: although we believe we have covered all the relevant issues and reached a reasonable conclusion, our ultimate decision could yet be affected by any information that is relevant to the issues we have to consider. However, unless we receive information that leads us to alter the conditions in the draft Permit, or to reject the Application altogether, we will issue the Permit in its current form.

In this document we frequently say “we have decided”. That gives the impression that our mind is already made up; but as we have explained above, we have not yet done so. The language we use enables this document to become the final decision document in due course with no more re-drafting than is absolutely necessary.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future.

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1. Executive summary

1.1. Application summary

This variation (V019) is one component of a series of permit changes under application PAN-029148. Each component is subject to standard determination requirements. All relate to the planned major transformation of Port Talbot Steelworks from ore-based iron and steelmaking (using Blast Furnaces and Basic Oxygen Furnaces) to a reconfigured, Electric Arc Furnace (EAF) based steelmaking operation. The scale of this industrial transformation means that it is necessary to divide these permit changes into separate work packages or 'components' for greater efficiency, but they all fall under a single Permit Application Number (PAN) with common scoping application documents. This approach does not change our impartial and independent determination of each individual variation on its own merits.

Variation application (V019) includes three discrete components:

1. Removal from the permit activities no longer undertaken and incapable of being restarted (blast-furnace/BOS production related).
2. Suspension/mothballing of activities under temporary cessation during site transformation (and in some cases pending a final decision on their future).
3. Permitting of alternative steam generation boilers (medium combustion plant) to fulfil residual site demand following decommissioning of Large Combustion Plant previously supplying steam.

1.2. Our decision

We are minded to issue the variation for Port Talbot Steelworks operated by Tata Steel UK Limited.

However, as explained further below, we have agreed with the operator to defer its request for two-permit consolidation (main steelworks installation and cold mill effluent treatment plant) until determination of the main EAF variation application within PAN-029148.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

2. Receipt of the application

2.1 PAN-029148 components and administration

The procedural requirements for a permit application (fee, form F declaration, over-arching variation non-technical summary) were provided in [framework application PAN-029148](#) received 02/05/2025. This over-arching application for a substantial variation is associated with variation V018 (base application) but administratively covers all sub-components determined individually during the transition project. V018 will be determined last and close out the framework application approach, when full information is available for determination of the EAF proposal. Meanwhile, discrete work packages are progressed independently under the framework as standalone variations.

While the PAN-029148 framework application is a substantial variation, in common with other determination matters, each individual variation is assessed on its own merits, and in the case of V019 is regarded as a normal variation. The V019 application was [received on 20/05/2025](#). In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- Demonstration that items to be removed from permit have been formally decommissioned, and that mothballed items are formally prevented from being restarted on an ad-hoc basis.

Upon receipt of this information, on [27/06/2025](#), we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

2.2 Package Boiler Application timeline

It is noted that the [original technical application](#) for operation of 3 x MCP boilers was received on 11/06/2024. Further information was provided on [13/06/2024](#) and [19/06/2024](#). However the permit application remained formally incomplete, as the Application fee and Form F were absent and were not provided upon request (02/04/2025) before other variation components became relevant.

Rather than proceed on a standalone basis, NRW decided to incorporate this work into variation V019 when the Form F and fee were resolved (02/05/2026). From a formal permitting perspective, it is considered that the V019 application, including the MCP component was complete and duly made on 27/06/2025 when the final information relating to all parts was received.

Finally, it is noted that a revised MCP application was received 20/12/2024 (4 x MCP boiler operation) but was considered withdrawn by NRW as it was not progressed to completion before the need for additional units was eliminated by the operator and confirmed to NRW that the further variation was no longer required. It is marked as “withdrawn” on our records.

3. Confidential information

The applicant made a claim for no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

4. Legislation

The variation will be issued, under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 (the EPR). The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the Industrial Emissions Directive 2010/75/EU (the IED);
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

- Includes waste operations and, following this variation, new medium combustion plant as described in Schedule 25A of the EPR 2016.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.

The application included the proposal to consolidate two parts of a multi-operator permit: the main integrated steelworks (BL7108IM) and the cold mill effluent treatment plant (AB3192HQ). This is formally a “regulator initiated” variation under regulation 18(6(a)) of EPR as the regulations do not make provision for an operator to request consolidation of two separate permits. Acknowledging the operator request we have decided that such a consolidation is in the interests of all parties. However, given the complexity of the site (and permit) transition to EAF described above, we have decided that the most effective permitting solution is to complete this with the planned whole-permit consolidation (the expected final stage of permit variation associated with site transformation, subject to future determination). We have therefore deferred this item for subsequent action within PAN-029148 application. We do not regard this as a part refusal, and have agreed the approach (in Operator comments), for increased regulatory efficiency during the permit transition.

As the EPR regulator for Part A1 installations in Wales, NRW are required to determine any duly made Part A1 permit applications. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement¹

¹ [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary. This permitting decision only considers matters within V019 variation application; other permitting relating to the planned EAF operation will be determined independently by separate variation application. The future outcome of applications not yet determined (or even submitted) must not be assumed by the operator or other parties.

Any proposed development and wider associated activities will also be required to be compliant with all relevant and applicable law, for example, other environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

5. Consultation

Consultation is not automatically required for this normal variation. Normal variations only require consultation by exception. In this case, we recognise that while technically an independent variation, it is related to other matters of planned site transformation, including future EAF operation as already discussed. We have therefore decided that, while we did not consult on the received application, we will consult upon our draft decision to remove primary steelmaking activities, recognising wider public and political interest. This decision was made in accordance the Environment Permitting Regulations (EPR), our statutory Public Participation

Statement² and our Regulatory Guidance. It is expected that the future EAF application component will likely be a substantial variation subject to statutory consultation, depending on the technical content when received.

We advertised the draft determination decision by a notice placed on our website, which contained all necessary information required by the EPR/IED, including advising people where and when they could see a copy of the Application. A dedicated NRW information page ([here](#)) gave more general information on the proposed Tata transformation and provided a link to the specific consultation when live, which started **19/10/2026** and ended **13/11/2026**.

Having carefully considered the Application and all other relevant information, we are putting our draft decision before the public and other interested parties in the form of a draft Permit, together with this explanatory document. As a result of this stage in the process, the public has been provided with all the information that is relevant to our determination, including the original Application and additional information obtained subsequently. We will consider all relevant representations we receive in response to this final consultation and will amend this explanatory document as appropriate to explain how we have done this, when we publish our final decision.

6. Requests for information

Informal information requests were made via email. These related to technical queries arising when the variation notice was prepared, for example:

- Which secondary steelmaking assets were retained, and which decommissioned, as the terminology was inconsistent
- Which air and water emission points were retained/decommissioned, corresponding to numerous pieces of equipment across the steelworks
- Clarification of anomalies in previous permitting history (i.e. omissions by NRW in permit log)

² [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

The requests were explained in a call with the operator, and provided by email by way of an annotated variation notice, containing points for clarification. The operator responded by updating our document with answers to the questions (i.e. “track changes” comments). Furthermore, in their response, the operator updated their permit application in terms of the status of some operations (e.g. change from removed to mothballed). We have decided to accept these material updates to the application and have received sufficient information in their regard, noting the complexity of the transition of the site, and the need for flexibility in our approach. The changes described below are the final updated application.

However, during the determination the operator also made further requests for us to consider additional changes to the permit, principally regarding effluent discharges and associated monitoring. We have not accepted as part of variation (EPR [Core Guidance](#) 6.8) as we regard it as additional new work beyond the scope of the original submission. We will however consider it during the wider variation process of V018.

7. The Installation

7.1. The permitted activities

Prior to this variation, the regulated facility was an integrated steelworks installation comprising of multiple activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations, plus directly associated activities and waste operations as detailed in the permit (V017). This included (but is not limited to) steel production from iron ore and coke via sintering, coke making, ironmaking with blast furnaces, Basic Oxygen Steelmaking, continuous casting, reheating, rolling, and further downstream steelmaking, plus on-site energy generation from works-arising gases, effluent treatment, scrap and waste handling activities etc. Further activities within the installation (e.g. slag handling) are permitted to different operators via related multi-operator installation permits as detailed in BL7108IM permit, but these are unaltered by this variation.

Together, these listed and directly associated activities comprised the permitted Installation, but V019 makes considerable changes to the steelworks installation. These are described in detail below and in the Introductory Note to the V019 permit

variation notice, but briefly comprise the removal of most primary steelmaking and related activities (coke-making and its effluent treatment, blast furnaces) and the major modification/mothballing of others (BOS and continuous casting, combustion and energy infrastructure, sintering and coal/coke/ore handling) to reflect the closure of large parts of the site and re-alignment with intended future site operations including EAF steel production, while retaining current operation of downstream steelmaking (reheat furnaces and rolling, pickling, etc). Future operations (e.g. EAF) are not consented by this variation.

7.2. Changes to the installation in this variation

The main changes resulting from this variation are as follows:

- Removal from the permit activities no longer undertaken and incapable of being restarted (blast-furnace/BOS production related).
- Suspension/mothballing of activities under temporary cessation during site transformation (and in some cases pending a final decision on their future).
- Permitting of alternative steam generation boilers (medium combustion plant) to fulfil residual site demand following decommissioning of Large Combustion Plant previously supplying steam.

The request by the operator to consolidate the main installation permit and the Cold Mill Effluent Treatment Plant permit in this application are noted, but by agreement with the operator, this part of the application is deferred for later variation when the steelworks permit is to be consolidated in any case. However, subject to final determination, we believe that we have received sufficient information to complete this consolidation, and do not expect to require re-submission of information or additional information in order to complete this consolidation subsequently.

7.3. Temporary and permanent cessation of activities

In simple terms, when an operator permanently ceases an activity, they may (but are not required to) update the permit to reflect this fact. (EPR [Core Guidance](#) 7.18). Until they do so, permitting requirements (including associated regulatory fees) continue to apply. If activities remain permitted but are not undertaken, they generally continue to be consented to operate within the permit conditions specified.

The environmental permitting regulations specify that permitted land can only be removed from permitting requirements by surrender and not by variation [Regulation 20(2)]. The regulators however, may by permit variation, remove activities from a permit, without reducing the extent of the permitted site. This variation cannot, and does not include any element of surrender.

In this case, the operator has applied to remove activities which they no longer undertake, but retain all of the permitted area with no change to the installation site boundary, pending further anticipated changes to the site and activity which are subject to separate determination. They have also applied to formally suspend, or “mothball” other activities that they are not currently undertaking. Doing this means that we may choose to abate subsistence fees associated with them (provided it is clear they cannot be restarted in the interim), whilst allowing the operator to retain the activity for possible future use (or later surrender following their final decision on operations). Our core requirement in determining this variation is absolute clarity as to the status (ongoing, altered, mothballed or surrendered) of each permitted activity, which also allows us to assess the likely degree of public interest in this application.

Activities authorised on the site prior to this variation are complex, and inter-related. Removal of certain decommissioned activities may mean that other mothballed ones require adaptation before they are operated again. Therefore, where activities continue to be permitted but are currently non-operational, we may place additional requirements on the operator to provide us with information on those activities (by way of permit variation, pre-operational condition or notification) before these activities are authorised to restart. In practice, as a regulator, NRW observes that extensive periods of inactivity of industrial equipment often results in the need for alteration or upgrading prior to restart, and such changes in themselves can trigger permitting changes e.g. review of BAT following substantial change. If relevant, the operator would be required to apply for these in the normal way.

7.4. Removal and modification of permitted activities by decommissioning

The operator has applied to completely remove a number of decommissioned EPR Listed Activities from the permit as shown below. We have granted this change, having established that the activities have ceased, and have been decommissioned such that they are incapable of being easily restarted. The operator is no longer authorised to carry out these activities.

Activities completely removed from Table S1.1 of the permit

Activity Listed in Schedule 1 of the EP regulations	Brief description	Comment
1.2 A(1)(a) Refining gas where this is likely to involve the use of 1000 or more tonnes of gas in any 12-month period	Coke making in 2 batteries of Morfa Coke ovens and associated coke oven gas treatment in byproducts plant	Coke ovens have ceased operation – supply of coke to blast furnace and coke oven gas to integrated works operations is no longer necessary or viable
5.3 A(1)(a)(i) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment	Coke oven effluent (aqueous) treatment plant	Coke ovens / byproducts ceased operation – connected effluent treatment no longer required
2.1 B (c) Desulphurising iron, steel or any ferrous alloy	Desulphurising iron, steel or any ferrous alloy.	No longer relevant. Desulphurisation in the permit is an intermediate step between blast furnace iron production and basic oxygen steelmaking, both of which have ceased.

In addition, the following permitted activities, including the installation's primary (iron and steelmaking) activity, are substantially altered by removal of parts which are no longer undertaken. As other parts of the activity remain relevant, these are retained but updated as necessary, so as shown below the 2.1 A(1)(b) activity and 1.1 A(1)(a) activity are retained but revised by removal of parts:

Activities revised in Table S1.1 of the permit by removal of substantial parts

Activity Listed in Schedule 1 of the EP regulations	Brief description – before variation ^{Note 1}	Brief description – after variation ^{Note 1}	Explanation
2.1 A(1)(b) Producing, melting or refining iron or	2 Blast Furnace 2 BOS Vessels / Secondary Steelmaking 3 Continuous Casting machines	Secondary Steelmaking Ruhrstahl-Heraeus Degasser [RHD],	This is because blast furnaces, Basic Oxygen Steelmaking (BOS) are no longer undertaken. Parts of Secondary steel making and 2 continuous casters are retained as they remain relevant within

steel or any ferrous alloy, including continuous casting		Composition Adjustment by Sealed Argon Bubbling [CAS2]. 2 Continuous Casting machines (Caster 1 and Caster 3)	planned EAF steelmaking (but may be subject to future variation by application by the operator). However CAS1, RH degasser, manganese fume extraction, RH and RD preheater installations, steel desulphurisation (emitting via A63) and caster 2 are removed as they are no longer required; any future steelmaking will be in a 2-caster and reduced secondary steelmaking footprint basis.
1.1 A(1)(a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts.	Power Station boilers (A50, A51, A52A, A52B, A53, A62, A68 and A69) LCP 73 (A62); LCP 337 (A50) (TNP LCP90); LCP 338 (A53); (TNP LCP91) LCP 339 (A51); (TNP LCP 92) LCP 340 (A52A & A52B); (TNP LCP93) LCP 425 (A68) LCP 426 (A69)	-none-	No power station (LCP) activities following removal of coke ovens, BOS, BF, which provided fuel gases for onsite generation.
	Reheat Furnaces A34A and A34B	Reheat Furnaces A34A and A34B (150 MW _{th} each)	No change – furnaces retained. Thermal capacity noted, as provided by Tata Steel to inform the 1.1 combustion classification.
	Stoves A6 and A7	-none-	Stoves are blast furnace stoves. This activity ceases along with the blast furnaces.

Note 1: Text in red indicates portions which are removed as a result of this variation. Green indicates revised text.

In our variation notice we have updated parts of Schedule 3 of the permit to clarify which emission points (air and water) are no longer authorised as a result of activity cessation and modification. In addition to the changes above, note that as a result of a request confirmed by correspondence with the operator during determination, we have removed the disused Ebner furnace (A30) from permit (cold rolling mill) which is otherwise unaltered: this change does not affect the Table S1.1 description of cold rolling (AR11).

7.5. Suspension from permit of mothballed activities

The operator has applied to formally suspend (“mothball”) a number of permitted EPR Activities from as shown below. We have granted this change, having established that the activities have temporarily ceased, and are incapable of being re-started on an ad-hoc basis. Their suspension results from the closure of the integrated steelmaking route) and is part of the operator’s overall site transition plan. Temporary cessation gives the operator and regulator certainty as to activities currently undertaken on the site, and because the activities are definitively not operational, allows us to align our subsistence fee charged to the operator for regulation of operations. When an activity is mothballed, the “limits of activity” in Table S1.1. of the permit make it clear that the activity is mothballed, and may only be restarted with NRW’s involvement; the permit continues to authorise the operation but for the time being it is not allowed to operate.

The operator must gain appropriate consent from NRW to restart mothballed activities, prior to their operation, as detailed in the table below. This ranges from straightforward notification of the change of status (where assets are simply turned off), to provision of technical information on the process prior to its restart (where the operation of the process may change as a consequence of wider changes to the installation, with consequent modifications being anticipated to the mothballed activity). This is owing to the complexity of the changes to the steelworks installation and existing equipment, and the inter-action of mothballed equipment with surrendered operations and/or proposed new EAF steelmaking. It is to ensure that readiness to resume, technical coherence and BAT are confirmed and determined (as necessary) by Natural Resources Wales in the new operational configuration.

Activities revised in Table S1.1 of the permit by temporary cessation (“mothballing”) of activities.

Activity Listed in Schedule 1 of the EP regulations	Brief description ^{Note 1}	Limits of activity – after variation
2.1 A(1)(d) Loading, unloading or otherwise handling or storing more than 500,000 tonnes in total in any 12-month period of iron ore, except in the course of mining operations, or burnt pyrites.	Unloading and handling iron ore	“Mothballed – activity may not be operated without permit variation to reflect modified activity”. <i>The receipt, storage and transfer of iron ore and associated raw materials (includes unloading)</i>

2.1 A(1)(b) Producing, melting or refining iron or steel or any ferrous alloy, including continuous casting ^{Note 2}	Secondary Steelmaking Ruhrstahl-Heraeus Degasser [RHD], Composition Adjustment by Sealed Argon Bubbling [CAS2]. 2 Continuous Casting machines (Caster 1 and Caster 3)	"Mothballed – activity may not be operated without permit variation including updated technical description of revised A63 extraction configuration, RHD operation without preheating, and associated abatement/emissions BAT assessments" added to limits. Following variation determination, casters 1 & 3 will recommence but RHD CAS2 will remain mothballed until written notification received and accepted by NRW from the operator as their routine use is not expected in EAF operation. <i>Secondary Steelmaking. Casting steel into slabs for sale or for further processing into rolled products</i>
2.1 A(1)(a) Roasting or sintering metal ore, including sulphide ore, or any mixture of iron ore with or without other materials	Sintering	"Mothballed – activity may not be operated without permit variation to reflect modified activity". <i>Preparing iron ore, recycled iron oxides and associated raw materials to produce sinter</i>
3.5 B (b)(iii) Loading or unloading petroleum coke, coal, coke or any other coal product except unloading on a retail sale	Mineral activity	"Mothballed – activity may not be operated without permit variation to reflect new scope of modified activity, [which currently relates to sintering, other former steelmaking (cokemaking and BF etc), and potential future EAF steelmaking]". <i>Loading/unloading coal and coke - receiving, storing and transferring coal and coke and associated raw materials</i>
Directly Associated Activity – Continuous Processing And Annealing Line (CAPL)	Thermal treatment, annealing, of rolled products	"Mothballed – activity may not be operated until written notification received and accepted by NRW from the operator, detailing the process being ready for re-commissioning".

It is noted that there is a definite intention by the operator to recommission some of the activities above as they are integral to the expected EAF steelmaking (e.g.

continuous casters). For others the future is uncertain and they will either restart (with or without modification), or eventually be removed from this installation permit, depending on the future commercial decisions of the operator and subject to permit determination as necessary.

7.6. Addition of Medium Combustion Plant (Package Boilers) for utility steam generation.

The variation adds two package boilers to the installation permit. These are new medium combustion plant (MCPs) under EPR (schedule 25A). The installation already has a Chapter 1 Section 1.1 Part A(1) combustion activity as detailed above (*Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts*). The boilers are therefore both added to the 1.1 combustion activity under aggregation rules, and listed separately in Table S1.1 as MCPs. They are classed as new medium combustion plant put into operation after 20 December 2018.

As a consequence of the changes to steelmaking described above, the site-wide steam utility demand has dropped considerably. The previous steam generation within the integrated steelworks (the 1.1. LCP boilers for energy generation), including steam take-off for other purposes, is no longer possible. There remains residual on-site steam demand for continuing rolled steel production activities. Therefore the two natural gas fired MCPs are added. They are Bosch UL-S16000 boilers with Dreizler MC10001.3 burners each of which are 10.9 MW_{th} input (collectively 20.8 MW_{th}).

Various MCP permit conditions, Table S1.2A, and Permit Schedule 8 (MCP information) are added to the permit via the variation notice. This is to impose MCP conditions, operating techniques and provide MCP mandatory information, respectively, for the package boilers.

The MCP technical application clearly identifies the location (narrative and grid reference) of the MCP boilers, which have subsequently been assigned emission point references A71 and A72 in the permit variation notice. On this basis we have not required an updated site plan of emission points for the variation, but note that a comprehensive one will be required for the subsequent consolidated permit.

As noted in section 2.2 above, the original application was for three identical MCPs as detailed, but reduced by the operator to two owing to reduction in site steam demand. Furthermore an application was received but withdrawn for a further identical MCP unit taking the total to four, but this was deemed not to be required by the operator, after the application was submitted. By agreement, between NRW and the operator two MCPs are added to the permit, based on precautionary environmental information in the application of assessment of three units.

Finally, it is noted that interim authorisation was given by NRW to the operator to operate up to three units, after technical information was submitted and assessed, but prior to completion of permit determination. The permit variation supersedes that authorisation, reducing the number of consented MCP units to two.

8. Operation of Installation

8.1 Environmental Management System

The Operator has a certified Environmental Management System (EMS) for the facility that will meet the requirements for an EMS in our “How to comply with your environmental permit” guidance³. It will be updated as necessary to cover the new/modified activities resultant from this variation.

8.2 Operating techniques

Installation activities and assessment of Best Available Techniques (BAT)

The applicant has described the MCP equipment and operating techniques and compared these against the relevant guidance notes in confirming that the new equipment is BAT (including in respect of energy efficiency). We are satisfied that the MCPs are consistent with BAT for the installation, noting that BAT at least aligns with MCP minimum standards. A BAT review is not required for cessation / mothballing of permitted activities. A comprehensive BAT assessment will be required in later permit

³ [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

variation application(s) as part of the proposed site transformation, for new / substantially modified activities.

9. The site

9.1. Site Plan

There are no changes to the site plan as a result of this variation.

9.2. Activity cessation and decommissioning – prevention of pollution

Permit condition 1.1.1 requires the Operator to have a written management system in place which identifies and minimises risks of pollution including those arising from closure. The operator must still ensure that pollution is prevented upon cessation of activities (temporary or permanent).

The operator has provided us with [sufficient evidence](#) that activities that have ceased operating, or have been mothballed (also including the main application documents above). They have shown that this has been done with regard to environmental risk, and to prevent pollution as infrastructure is altered or removed. Subsequent surrender of land, where relevant, requires separate application(s), and will be subject to appropriate assessment independent of this variation or the observations above.

10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. As applicable, all these factors have been considered during determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the applicant has provided environmental risk assessments with the application which identifies and the sources of key risks from the variation, possible pathways and receptors. This risk assessment and further assessments provided by the applicant and/or completed by NRW will be discussed in further detail below.

10.1. Assessment of risk from decommissioning / mothballing.

The operator has provided information on how they have controlled environmental risk during the complex processes of cessation and decommissioning (permanent or mothballing) in their application and additional information. They describe how discharges and emissions have ceased, how potentially polluting liquids and energy sources have been isolated/immobilised, and have summarised how the ongoing process of decommissioning items with environmental risk (such as hazardous substances and oils in equipment) are being removed from site over time, with appropriate controls.

As permitted manufacturing activity on the site decreases, operational environmental risk clearly quickly reduces, and we are satisfied that the decommissioning plan in place and ongoing adequately controls principal environmental risks. We are therefore satisfied that permitted activities can be removed/mothballed as described. Site key risks (air and water emissions, noise, dust, etc) are all reducing, but permit conditions and management requirements (e.g. ongoing emissions to water monitoring, air quality management plan) continue, albeit with the potential for reduction in scope, while the installation remains in operation, over the full permitted area pending anticipated surrender(s).

At this stage, further information / assessment of ongoing or ceasing activities is unnecessary for permitting (although subject to ongoing regulation, including through change/ closure, under both EPR and the control of major accident hazards regulations [COMAH]), and the further air quality information below relates only to newly permitted activities, i.e. the MCP package boilers which are added. For medium combustion plant, the principal emissions, and hence environmental impact, are via

emissions to air. The general installation conditions (e.g. for water, land, energy efficiency, odour and noise) remain comprehensive and are sufficient for controlling risk from the package boilers.

10.2 Assessment of impact on air quality: MCP package boilers

This section of the decision document deals with the assessment of emissions to air from the package boilers and the impact on local air quality. The applicant [has assessed](#) the Installation's potential emissions to air against the relevant air quality standards, and considered the potential impact upon human health in line with [relevant guidance](#). This guidance is intended for standalone MCP, but we have decided that in this individual case it is an appropriate approach for the MCPs on the IED Chapter II steelworks installation. As necessary we referred also to the more generic guidance for [installation air quality assessments](#) in informing our decision.

The assessment predicts the potential effects on local air quality from the MCP's exhaust emissions via 2 independent stacks. As the environmental impacts from the package boilers are limited in magnitude, a screening assessment using the "SCAIL" (Simple Calculation of Atmospheric Impact Limits) Combustion tool has been sufficient to screen all air pollutants and their impacts out as "insignificant".

The air impact screening assessment is precautionary in that it is based on the Installation operating continuously through the year (8760 hours) at the relevant long-term or short-term emission limit values, i.e., the maximum permitted emission rate. We are in agreement with this approach. The output from the screening has then been used to inform further assessment of health impacts. We also note that the assessment relied upon is for three MCP units as required at the time of permit application, although as described above, the requirement has dropped to two units, and this is what is consented in the permit – thereby making the screening more precautionary.

The applicant has calculated screening process contributions (PC) and predicted environmental concentrations (PEC) at locations within the immediate vicinity of the

installation and identified all sensitive receptor locations. The only pollutant of direct relevance from combustion of natural gas (a relatively “clean”, low sulphur fuel) is NO_x (as NO₂), the results for which are discussed below.

Emissions of NO_x as NO₂ was assessed against a long-term critical level of 40 µg/m³ (annual) and short-term critical level of 200 µg/m³ (hourly). At sensitive receptor locations the maximum predicted long-term PC was >1 % and the long-term PEC was <70 % of the long-term critical level. The highest calculated long-term impact was a PC of 4.9% and a PEC of 37% of the critical level at Byass Street, >600m from the emission point. Therefore, in accordance with the relevant guidance the long-term impacts can be considered as insignificant.

At sensitive receptor locations the maximum predicted short-term PC was <10 % of the short-term critical level. The highest calculated impact was a PC of 7.5%, also at Byass Street. Therefore, in accordance with the relevant guidance the short-term impacts can also be considered insignificant.

As described, the air emissions from the new MCP alone are screened out as insignificant using standard criteria and tools, and therefore further assessment (e.g. dispersion modelling) is unnecessary. This decision is made in the context described in the application, i.e. a substantial reduction in site emissions owing from activity cessation / mothballing as reported above, which will in future result in a reduction in both local and wider pollution. The new MCP emissions are order-of-magnitude lower than removed combustion capacity (large combustion plant and other), both in terms of thermal capacity and emissions, noting that the MCPs utilise intrinsically cleaner fuel (100% natural gas) than older large combustion plant burning blended steelworks gases that they partially replace.

The applicant has also used the SCAIL tool to undertake a precautionary screening assessment for impacts of small particulate (PM₁₀), which confirms that all emissions screen out on the basis of PC using the same criteria as above. However, we do not consider PM₁₀ as a relevant emission for natural gas combustion (although it is a relevant pollutant for the installation as a whole) so have not detailed the assessment here, which can be found in the application documents. The additional information

was provided in part as a result of the fact that the installation and MCP is in proximity (>400m to MCP, less to installation boundary) to the Port Talbot Air Quality Management Area (AQMA) which is declared for PM₁₀. We have considered the information provided and do not consider further assessment necessary.

Emission limits

We have decided that emission limits should be set for the parameters listed in the permit. NO_x (emitted mainly as NO but impacting after conversion to NO₂) has been identified as being emitted in significant quantity and Emission Limit Values (ELVs) based on BAT and minimum standards have been set. The MCP limit for new MCP fired with Natural gas, of 100 mg/Nm³ is considered BAT. It is considered that the ELVs and technical measures described in the application (e.g. optimised fuel combustion and control systems) will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured. There is also a requirement to monitor for carbon monoxide (as a measure of combustion efficacy) but an ELV is not required. As specified in the permit, all monitoring will be periodic, consistent with MCP guidance.

Based upon the information in the application and the measures that will be imposed by the permit we are satisfied that the appropriate measures will be in place to protect air quality for the environment and human health.

10.3 Assessment of other MCP impacts

We do not consider other impacts such as odour, pests, etc relevant to the MCPs. Small emissions of blowdown water will be sent to existing site drainage systems and be subject to existing emissions monitoring and ELVs. The operator provided a justification explaining why noise does not need to be considered further. The simple and precautionary noise estimates supplied with the application showed a sound power level of 46 dB(A) at receptors, which is considered small to insignificant and within typical background levels for urban areas – it is insignificant within the wider context of the steelworks and surrounding area. The operator has confirmed that the Package Boiler MCPs achieve a high degree of energy efficiency (up to 96%) which constitutes BAT, and have justified that detailed EPR Schedule 24 assessment of potential for heat recovery is not appropriate. We agree with this analysis. Finally, it

is noted that the operator indicates that the MCPs are temporary in nature, with a more permanent boiler/steam raising plant being intended later in the site transition. However, an end date for the equipment is not provided, and the impact / BAT assessment is such that we have decided to permit the MCPs with no time limit – they are consented until surrendered or reviewed.

11. Impact on National Site Network Sites, SSSIs and non-statutory sites

Only the MCPs are considered relevant – cessation / mothballing of activities does not require further protected sites assessment. The applicant has used the relevant MCP/SCAIL screening distance criteria (2 km for SSSI, 5km for National Site Network, for MCP >20MW_{th}) to identify relevant protected conservation sites which could be at risk from the proposal. We are in agreement with the screening distances used, considering them still applicable to MCP within an IED Ch II installation as described.

An assessment of the variation application and its potential to affect the identified sites has been carried out as part of the permit determination process. National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

11.1. The National Site Network

The following National Site Network site is located within 5 km of the MCP:

- Kenfig / Cynffig SAC (3.1km)

In June 2024, shortly after the MCP application was received, a detailed assessment of impact on National Site Network was undertaken. This was completed before interim authorisation of the MCPs was given by NRW, as noted in section 7.6 above.

At the time, our OGN 200 process was used and concluded that a Habitats Regulations Assessment (HRA) was not required because of no conceivable impact pathway to any of the National Site Network sites identified by virtue of the scale or location or nature of the project. This is recorded on the “form 1” available on the

public register and is on the basis that viewed in the context of the wider steelworks changes authorised by this variation, the changes to combustion on the site constitute an environmental improvement. Noting substantial overall reduction in air pollutant emissions (including NO_x) from the installation, also the fact that when screened separately the MCP pollutants screened out “insignificant” in SCAIL, and finally the absence of other credible pollution pathways from the MCPs.

This HRA has been reviewed upon issue of the Permit Variation, noting that the Guidance OGN 200 for HRAs has been updated since the assessment was made. The revised guidance makes it clear that projects that have positive (or neutral) effects on European Site Features should not be considered significant during the “likely significant effect” screening test. Therefore, the conclusion of the HRA for permit determination is therefore formally “no likely significant effect” (rather than no impact pathway) on the basis of improvement (*and also independently because screening for NO_x was insignificant (1 % of NO_x annual PC of 30 ug/m³, 1% of annual N-deposition of 5 kgN/ha/yr, 0.2 % of acid dep of 1.708 kg_{eq}/ha/yr – meaning that in all cases, background pollution need not be considered).*

As the conclusion of a lack of impact on the site is clear and based on established guidance/criteria, consultation with the protected sites advisory function of NRW is not required. The previously completed HRA is placed on file for the record, noting the formal change to the conclusion classification (which in either case is that a formal HRA appropriate assessment is not needed), but not changes to the project or the impact information used to reach the conclusion. In either case, there is no meaningful negative impact on the protected site. We have decided not to revise the recorded HRA, as it accurately records actual impacts, and was the basis for interim MCP authorisation prior to permit variation.

11.2. Sites of Special Scientific Interest (SSSI)

The following SSSIs are located within 2 km of the installation:

- Margam Moors (1.4 km)
- Eglwys Nunydd Reservoir (1.6 km)

As a Section 28G Authority as defined in the Countryside Rights of Way Act 2000 permitting teams within NRW has a legal duty, under Section 28I of the Wildlife and Countryside Act 1981, to consult with NRW for formal advice when permitting an activity which has been determined to be likely to damage the features of a SSSI.

To determine if consultation is required, a SSSI Assessment was completed. The assessment concluded that the proposed permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest. Therefore, no consultation with NRW's protected sites advisors is required.

A copy of the assessment is available to view on the public register. As per narrative above on HRA, this assessment was completed in 2024 when interim authorisation was given for the MCPs. There is no need to update, revise or replace it for permit determination.

12. Changes to The Permit

The permit is varied as detailed in full in Variation Notice EPR/BL7108IM/V019 to incorporate the changes above. A consolidated permit is not issued at this time.

A suite of conditions are added relating to MCPs, along with Schedule 8 – statutory MCP information.

Associated with the cessation / mothballing of activities, key tables in the schedules to the permit have been updated to reflect the changes:

- Table S1.1 (permitted activities)
- Table S3 (Air emission points)
- Table S3.7 (Energy generation and utility point source emissions to air – emissions limits and monitoring)
- Table S3.8 Point Source emissions to water

As already extensively described, this variation is the first of several anticipated components of a phased determination, which will further revise the extant permit (and variation notice). While the current permit is entirely valid, it is an interim measure,

hence our decision not to consolidate and fully review the conditions at this time. Therefore some conditions in the permit (e.g. relating to large combustion plant (LCP) and for reporting for emission points no longer in existence), while still valid, are no longer relevant and may be disregarded. This review and updating to remove redundant permit terms will be undertaken within PAN-029148 determination.

With the operator's agreement, we have also made limited minor changes to the permit to ensure clarity and coherence, and to correct historic anomalies. Including but not limited to:

1. The consolidated permit status log for BL7108IM has been amended to include the Transfer of the Cold Mill Effluent Treatment Plant in 2016 to a different operator. While this was documented in a transfer notice, it had not been fully incorporated into the main log for the steel works.
2. Nomenclature. During determination we noted minor inconsistencies in the terms used for specific specialist steelworks assets, so sought to clarify. The permit now refers to retained secondary steelmaking assets **Ruhrstahl-Heraeus Degasser (RHD)**, previously referred to as *RD degasser* or *RD KTB degasser*, and to the **Composition Adjustment by Sealed Argon Bubbling (CAS2) unit**, previously referred to as *CAS*, *CAS-OB* etc. For the avoidance of doubt, there is no change to the retained permitted assets, simply improved clarity/consistency in description.
3. Numbering. We have not changed the numbering of air and water emission points A1-A70, W1-W8, but have added air emission points A71 and A72. Given the considerable number of un-used emission point references owing to activity surrender, we may Rationalise Table S3 and re-assign emission point numbers in future variations

12.1. Temporary Cessation of Activities

Where this variation recognises the formal temporary cessation ("mothballing") of permitted activities, the Limits of Activity in Table S1.1 are amended to show that the activity is suspended, and may not be operated without the consent of NRW. The terms set for restarting are tailored to activities, so for instance steelmaking (2.1) activities may not be restarted until a permit variation is submitted, because future operation is inextricably linked to future EAF-based primary steel production, and there may be changes to existing assets that require inclusion within an overall BAT assessment. Conversely, the Continuous Processing and Annealing Line (CAPL) may

be restarted after notification to the regulatory officer, as its operation is largely independent of other planned changes to the steelworks.

12.2. Emission Limits

Emissions limits have been set for the new MCPs as described above, in accordance with BAT and MCPD minimum standards. Emissions limits for other sources have not been changed by this variation, although where emission points cease to exist (Table S3) then emission limits are no longer relevant nor required.

12.3. Monitoring

We have decided that monitoring should be carried out for the MCPs for the parameters listed in Schedule 3 of the permit, using the methods and to the frequencies specified in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with the emissions limit in the permit (NO_x) and for monitoring (CO) where no limit is specified.

The methods for periodic monitoring are in accordance with relevant international standards. Monitoring frequencies are in line with MCPD requirements. Based on the information in the application and the requirements set in the conditions of the permit we are satisfied that the monitoring techniques, personnel and equipment employed by the Operator will have either MCERTS certification or MCERTS accreditation as appropriate.

Monitoring requirements for other sources have not been changed by this variation (other than the correction to W3 noted above), although where emission points cease to exist (Table S3) then monitoring is no longer relevant nor required.

12.4. Reporting

We have specified the reporting requirements for the MCPs in Schedule 4 of the permit. This is to enable timely review by Natural Resources Wales to ensure compliance with permit conditions and to monitor the efficiency of material use and waste recovery at the installation.

Reporting requirements for other sources have not been changed by this variation, although where emission points cease to exist (Table S3) then reporting is no longer relevant nor required.

13. OPRA

The OPRA score has changed as a result of this variation. The new agreed score is now 500 (was 897). This will form the basis for ongoing subsistence fees.

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