Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0049478

Permit being assessed: BV0759IC.

For: Cardiff Rod & Bar Mill EPR/BV0759IC, **held by:** 7 Steel Manufacturing (UK) Limited

At: PO Box 83 Cardiff Rod & Bar Mill Castle Works , East Moors Road, Tremorfa, Cardiff, Cardiff, South Wales, CF24 5NN.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 26/09/2025.

Parts of permit assessed: 1.3.1, 2.3.5, 2.2.3 & 2.2.5.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Environmental Manager, on 26/09/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR1A	Action 1 – 7Steel – 26th September 2025: Please provide responses to requests 1A – 5A.	30/11/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

7Steel Manufacturing (UK) Limited

Rod & Bar Mill

EPR/BV0759IC

This report documents the findings of the compliance assessment conducted following the site audit and subsequent document request referenced in NRW_CAR0048378.

The audit focuses on the various aspects of containment in relation to process effluent and oil, which is broadly linked to permit conditions 1.3.1, 2.3.5, 2.2.3 and 2.2.5.

1. **Daily ETP Inspection Records**

   The daily ETP check sheets document inspections across key infrastructure areas including the main pumphouse, scale pit, dredgers, clarifiers, hotwell, cooling and Teva towers, Coldwell, interceptors and other various safety checks.

   Assessment: For the dates reviewed, all components were recorded as being in good condition on the sheets available. However, some sheets appeared to be missing, for dates 02/04/25 and 13/04/25, only page1 of 3 was available and for the 15/04/25 only pages 1 and 2 of 3 were available. It is unclear what checks are detailed on page 3, and may be out of scope of the request, however, for completeness, the following request is made.

   Request 1 A – Please provide the missing pages for the checks conducted on the above dates.

2. **ETP Maintenance Documentation**

   The document titled *ETP Maintenance* outlines several SAP work orders relating to routine and reactive maintenance activities. These include cleaning and inspection of the hotwell, checks on Unifloc and auxiliary equipment, inspection of the water overflow lagoon, and booster pump assessments. Each work order includes a priority rating and a description of the tasks undertaken.

   Assessment: The submitted documentation adequately fulfils the request, demonstrating that maintenance activities associated with the Effluent Treatment Plant (ETP) were correctly initiated, tracked, and closed out within the SAP system.

3. **Dock Release Documentation**

The valve responsible for discharges to the dock has remained closed since 2023. Consequently, no recent sign-off sheets are available for this component. This aspect will be further assessed once the new interceptor becomes functional and is put in use.

4. **Drainage CCTV Survey**

A drainage survey titled *Celsa Steel - Cardiff – 120425*, dated 12 April 2025, assessed approximately 205.06 meters of foul drainage located southeast of the main mill building. The surveyed section runs east to west before turning north, terminating adjacent to the South Clarifier tank. Drainage inspections are conducted on an ad hoc basis and are not currently integrated into the site's Planned Preventative Maintenance (PPM) schedule. Materials of construction were identified as cast iron and vitrified clay for the section surveyed. Several structural defects were noted throughout the surveyed sections.

Further information required:

Request 2A – The section of drainage detailed in this survey, does this section of drainage carry process effluent, surface water or foul domestic?

Request 2B - What actions were taken with regards to the defects identified within the survey report (*Celsa Steel - Cardiff – 120425)*?

Request 2C – With regards to the site drainage conveying process effluent from the mill to the scale pit, when was this drainage last inspected?

5. **Scale Pit Maintenance**

The scale pit is subject to daily inspections, which include checks on pumps, pipework, sump pump, and the scale grab, as well as general housekeeping. An annual SAP work order titled *Scale Pit Cleaning* is in place, which involves removal of accumulated residue and inspection of key components such as baffle plates. A screenshot of the SAP entry was provided.

Assessment:

Based on the information provided, it is currently unclear how detailed the annual cleaning process is, or which specific aspects of the scale pit are assessed. It would be reasonable to expect that any on-site effluent sumps, such as the scale pit, are subject to a condition assessment to ensure their integrity.

Maintaining the structural integrity of these sumps is essential to prevent issues such as cracking, which could result in uncontrolled leakage of pollutants into the surrounding soil and groundwater.

As a matter of best practice, such assessments should ideally follow a written scheme of examination. This helps ensure consistency, establishes clear inspection criteria, and defines responsibilities and inspection intervals. A written scheme can also be tailored to reflect the specific risks associated with each sump, taking into account factors such as its contents, age, construction, and location—allowing for proportionate and effective inspections.

Request 3A - With this in mind, could you please confirm whether 7Steel has any written procedures in place to ensure the integrity of the site's sumps is routinely assessed? If available, please provide copies.

6. **Actions From CAR_NRW0039776 – EMS Information & Clarifier Inspections**
   No list provided, however, the 'Daily *Oil System Checks'* documentation detailed various operational checks conducted on the internal oil systems, including tank and centrifuge temperatures. The operator also stated that visual inspections of tanks, pipework, pumps, filters, and the sump are conducted.

   A third-party inspection report for the South Clarifier (2021) was reviewed. The report concluded that the tank was in fair condition with no significant defects, although minor hairline cracks and water staining were observed. No active leaks were reported. The observations were limited to the external walls, as the clarifier was in service during the inspection.

   Assessment: The response outlining the current daily checks carried out on the internal oil systems does not fully address the requirements of the previous action issued under CAR_NRW0039116.

   The action specifically requested that the site's Environmental Management System (EMS) be updated to include a comprehensive list of tanks and bunds, scheduled for periodic inspection and maintenance. These inspections should be aligned with CIRIA guidance in terms of frequency and approach.

   It is also recommended that the list includes key details for each tank or bund—such as age, materials of construction, and design life—which can help inform appropriate inspection intervals.

   Additionally, the current daily oil system checks do not appear to document all the elements stated to be inspected. If components such as pipework, tanks, filters, and sumps are included in these checks, it would be beneficial for these details to be formally recorded on the check sheet.

   While daily checks are being undertaken, the level of scrutiny remains unclear. Tanks should be subject to formal integrity assessments at suitable intervals, carried out by qualified personnel and in accordance with a written scheme of examination or documented procedure.

   Request 4A - Could you please confirm whether there are plans to update the EMS accordingly, and whether a written scheme of examination or procedure is in place for the formal inspection of tanks and bunds?

Recommendation: Formalise any additional checks that are conducted by including them within the relevant check sheet.

7. **North Clarifier Tank Status**

The North Clarifier tank remains non-operational and is only used during emergency events or plant shutdowns. Its limited use is primarily influenced by the interceptor system. Once the new interceptor becomes operational, the North Clarifier will be formally decommissioned. Nonetheless, annual in-house inspections continue, with the most recent conducted in March 2024.

8. **Interceptor Project**

At the time of review, the interceptor installation was ongoing. 7Steel confirmed that all associated ancillary equipment will be incorporated into the SAP maintenance system upon project completion.

9. **Waste Oil Storage and Bunding**

Daily inspections of the waste oil tanks are documented within the ETP inspection sheets, specifically under the ‘Clarifiers’ section, which includes checks to ensure tanks are free of oil and water.

Assessment: The original request pertained to the ‘bunded’ area used for storing waste oil containers. This aspect was not directly addressed in the response.

Request 5A – Please provide a response in line with the initial request. Is the waste oil storage area subject to any checks to ensure the containment / surfacing is in an adequate condition? Additionally, are these checks recorded?

10. **Scale/Sludge Dewatering Pond**

The dewatering pond was stated to be subject to daily visual inspections as part of routine ETP checks. A more detailed inspection is conducted periodically, with the last comprehensive assessment completed in 2021.

11. **Emergency Pond**

The emergency pond is also stated to be inspected daily. In addition, a more thorough inspection of both the emergency and dewatering ponds, including associated infrastructure, is conducted via SAP work orders. The last full inspection was carried out in 2021.

Assessment of 10 & 11: It is unclear form the documentation provided that these aspects are routinely inspected during the daily ETP inspections. It is also unclear what the less frequent but more thorough inspection entails.

Action 1 – 7Steel – 26th September 2025: Please provide responses to requests 1A – 5A. **Due 30th November 2025.**

The documentation and responses provided indicate that sound operational checks are in place for various aspects of the effluent treatment and oil systems. However, there are areas where documentation could be strengthened and more clearly integrated within the Environmental Management System (EMS). In particular, maintenance management practices, especially those concerning the integrity of drainage infrastructure, tanks, sumps, and bunds which would benefit from closer scrutiny. As such, additional information has been requested to further support this review.

Report end.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management
- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations
- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring
- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information
- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response
Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.