

Compliance Assessment Report CAR_NRW0049776

Permit being assessed: EP3830GH.

For: Liberty Steel Newport Ltd, **held by:** Liberty Steel Newport Ltd

At: Corporation Road, Newport, NP19 4XE.

Type of assessment: Check Monitoring/Sampling,

Reason: Routine.

On: 24/10/2025.

Parts of permit assessed: Reporting, Emissions & Monitoring and Notifications.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Resources & Compliance Manager, on 24/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	0.1

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
IR4B	Operator to submit future monitoring reports inside the 28-day reporting window.	28/01/2026

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

This Compliance Assessment Report (CAR) has been produced in response to the submission of quarter 2 monitoring data by Liberty Steel Ltd. (*documents: WATER 1 Q2 2025 and AIR 1 Q2 2025*) as required by the following environmental permit conditions in permit no. EPR/EP3830GH.

1.0 Reporting

Condition 4.2.3 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 (Reporting of monitoring data) is reproduced below:

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Particulate	A1, A2	Every 3 month	
Oxides of Nitrogen mg/m ³	A1, A2, A5	Every 3 month	
Carbon Monoxide	A1, A2	Every 12 month	
Sulphur Dioxide	A1, A2	Every 12 month	
VOC as Carbon	A1, A2	Every 12 month	
PCDD/F	A1, A2	Every 12 month	
Metals ¹	A1, A2	Every 12 month	
Mercury	A1, A2	Every 12 month	
PAH	A1, A2	Every 12 month	
PCB	A1, A2	Every 12 month	
Suspended Solids	W1	Every 3 month	
Oil and Grease	W1	Every 3 month	
pH	W1	Every 3 month	
Zinc	W1	Every 3 month	
Metals ¹ and Iron	W1	Every 3 month	
Energy		Every 12 month	
Environment monitoring		Annual	
Borehole monitoring		Annual	
Waste		Every 12 month	

Notes:

1. Metal include elements and compounds of Pb, As, Cd, Cr, Ni, Cu, Hg and Zn expressed as the metal and shall be individually reported
2. Reporting to approximate with calendar quarters
3. Reporting may be suspended by written agreement of Natural Resources Wales

Table S4.4 (Reporting forms) is partially reproduced below.

Table S4.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	01/04/16
Water	Form water 1 or other form as agreed in writing by Natural Resources Wales	01/04/16

1.1 Reporting Compliance Assessment*Point Source Emissions to Air – A1, A2 and A5*

1. The reporting form for emissions to air was submitted by Liberty Steel Ltd. via email on 31/07/2025
2. The reporting form submission was not made inside the 28-day reporting window which represents non-compliance with the environmental permit.
3. The reporting form submitted includes all parameters and emission points specified in schedule 4 table S4.1 which represents compliance with the environmental permit.
4. The reporting form submitted is for the reporting period specified in schedule 4 table S4.1 which represents compliance with the environmental permit.
5. The emissions data was not submitted using the form specified in schedule 4 table S4.4 however, all information reported in form *Air1 / 13/11/2016* is aligned to the reporting requirements of the environmental permit and therefore represents compliance with the environmental permit.
6. The reporting form submitted includes results and assessments as specified in schedule 4, table 4.4 which represents compliance with the environmental permit.

Point Source Emissions to Water – W1

1. The reporting form for emissions to water was submitted by Liberty Steel Ltd. via email on 31/07/2025
2. The reporting form submission was not made inside the 28-day reporting window which represents non-compliance with the environmental permit.
3. The reporting form submitted includes all parameters and emission points specified in schedule 4 table S4.1 which represents compliance with the environmental permit.
4. The reporting form submitted is for the reporting period specified in schedule 4 table S4.1 which represents compliance with the environmental permit.
5. The emission data was not submitted using the form specified in schedule 4 table S4.4 however, all information reported in form *Water1 / 15/08/2016* is aligned to the reporting requirements of the environmental permit and therefore represents compliance with the environmental permit. **Note** – the emission limit value (ELV) for cadmium in the permit is 0.05mg/l, however, the *Water1 / 15/08/2016* form states that the ELV for cadmium is 0.006mg/l. NRW will issue an updated *Water1* form to Liberty Steel prior to the end of the current reporting period.
6. The reporting form submitted includes results and assessments as specified in schedule 4 table 4.4 which represents compliance with the environmental permit.

As a result of this non-compliance with permit condition 4.2.3, a consolidated CCS score [C4] has been recorded against compliance sub-criteria IR4B – Reporting

Action 1: Operator to submit future monitoring reports for emissions to air and water inside the 28-day reporting window.

2.0 Emissions & Monitoring

Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Table S3.2 (Point source emissions to water (other than sewer) and land - emission limits and monitoring requirements) is reproduced below.

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
		Total Hydrocarbons	5 mg/l			SCA blue book 77 ISBN 0117517283 2002 or other ISO, BS or SCA blue book method as approved by Natural Resources Wales
		Lead	0.1mg/l			BS 6068-2.60:1998, BS EN ISO 11885 1998
		Nickel	0.1mg/l			BS 6068-2.60:1998, BS EN ISO 11885 1998
		Arsenic	0.01mg/l			BS 6068-2.60:1998, BS EN ISO 11885 1998
		Cadmium	0.05mg/l			BS 6068-2.60:1998, BS EN ISO 11885 1998
		Chromium	0.2mg/l			BS EN ISO 15586 BS EN ISO 11885 1998
		Copper	0.1mg/l			BS EN ISO 15586 BS EN ISO 11885 1998
		Zinc	0.5mg			BS 6068-2.60:1998, BS EN ISO 11885 1998
		Iron Compounds	5mg/l			BS 6068-2.74:2002, BS EN ISO 13506:2002

2.1 Emissions & Monitoring Compliance Assessment

Point Source Emissions to Air – A1, A2 and A5

The activities giving rise to emissions from points A1 and A2 were not in operation and generated no emissions to air during the reporting period (Q2 2025). The process giving rise to emissions from point A5 was idled and generated no emissions to air during the reporting period (Q2 2025). The report therefore contains no emissions monitoring results for emission points A1, A2 and A5 which represents compliance with the environmental permit.

Point Source Emissions to Water – W1

The emissions monitoring data reported in form *Water1* / 15/08/2016 demonstrates that all emissions to water were within the limits specified within Schedule 3, Table S3.2 which represents compliance with the environmental permit.

3.0 Notifications

As there were no limit exceedances in Q2 no notifications were submitted.

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.