

Compliance Assessment Report CAR_NRW0050295

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: 31/12/2025.

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 08/01/2026.

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	C3 Minor	2.3.6
IR4A - Installations - Information - Records	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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	Ensure procedures and works orders contain clear instructions for secondary containment / infrastructure integrity & condition checks. Ensure all checks are captured and recorded.	Already completed

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 compliance assessment report (CAR) details the response to actions issued in CAR_NRW0049478. This was a request to further information with regards to a containment audit detailed in NRW_CAR0048378.

The audit focused 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.

The actions are listed below for ease of reference.

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

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?

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.

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?

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?

Responses and evaluation of information received

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Request 1 A:

The requested check sheets were received and are satisfactory. This aspect is considered complete.

Request 2 A: The drainage detailed in the drainage survey report was confirmed to carry foul domestic, as such this is not relevant to the audit. This aspect is considered complete.

Request 2 B: 7 Steel have stated that a quotation for repair has been sought from an external company, with the repair work now scheduled for 2026. This aspect is considered complete.

Request 2 C: 7 Steel have confirmed that the process water from the scale pit is conveyed using a flume/channel not a pipe. The flume is subject to inspection annually during the shutdown. A specialist contractor undertakes cleaning and inspection of the flume. This aspect is considered complete.

Request 3 A: 7 Steel confirmed that there are now written procedures for completing the scale pit inspection. & steel confirmed that this aspect is managed through the SAP system, which includes a description of the work.

7 Steel have stated that the work description has been updated to include additional information and clearer details regarding the inspection requirements. This aspect is considered complete.

Request 4 A: 7 Steel confirmed that the RBM maintenance system has been updated to include clear and detailed descriptions of the required maintenance and inspections tasks. Examples of the updated cellar tasks descriptions and completed work orders were provided. The task list looks comprehensive and includes checks for integrity on both primary and secondary containment. This aspect is considered complete.

Request 5 A: 7 Steel have confirmed that checks for the waste oil storage area have now been included on the 'daily checks' regime, which are undertaken by the on-site water contractor. A copy of the daily check sheet 'RBM Check Sheet Rev2' was received and shows the waste oil storage area is subject to containment checks. This aspect is considered complete.

With regards to requests 3A, 4A & 5A, it is apparent that prior to the updated procedures being implemented some aspects, particularly those relating to clear instructions / procedures and records of maintenance for containment measures were deficient. The checks were focused on the operability of various equipment, but specific checks for pollution control measures, i.e., integrity checks on bunds etc had not been included. It is apparent that daily checks are conducted for across a multitude of assets and equipment across the site, including those assets and equipment benefiting from the containment measures. As such, it is reasonable to conclude that leaks would be identified within a relatively short timeframe. However, without adequate and specific checks, it is possible that deficient

secondary containment could go un-detected, leading to a loss of material to the soil / groundwater. Regular checks of the secondary containment would further reduce the likelihood of this occurring.

Furthermore, the lack of specific instruction and detail for checks on the scale pit could result in integrity aspects being overlooked, or no record of what aspects have been assessed.

In accordance with NRW's compliance scoring guidance, this constitutes a minor category 3 non-compliance. As the operator has procedures in place, evidence shows the procedures are being followed but procedural gaps were identified.

Non-compliance: A category 3 minor non-compliance is issued against permit condition 2.3.6.

No further actions will be issued as the operator has updated the various procedures where gaps were identified.

All outstanding actions in relation to this audit are now considered complete.

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.