Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0050310

Permit being assessed: TP3639BH.

For: Tremorfa Melt Shop, **held by:** 7 Steel Manufacturing (UK) Limited

At: Seawall Road, Tremorfa, Cardiff, Cardiff, CF24 5TH.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 12/09/2025 between 13:00 and 15:00.

Parts of permit assessed: 1.1, 3.1.2, 3.2.1,3.5.1, 3.7.2(b), 4.2.3.

NRW Lead Officer: Dale Padfield, accompanied by Greg Gardner.

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	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3I - Installations - Emissions and monitoring - Fire	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	

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?

No action required.

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

EPR/TP3639BH

Compliance assessment report (CAR) detailing the following topics:

- Quarter 3 (July - September) 2025 permit reporting returns
- Site visit on the 12th of September regarding the site updates for re-establishing compliance with emission limit values for sewer discharges at the S1 emission point.
- Response to actions from CAR_NRW0049303.

Quarter 3 (July – September) 2025 permit reporting returns

Air emissions ~ A1 / A5 / Ambient monitoring

A1 ~ The operator reported the following highest monthly concentrations, 4.20 mg/m^3, 2.04 mg/m^3 and 2.48 mg/m^3 for the months July, August and September respectively. The returns are accepted.

A4 ~ A Ringelmann shade 0 was reported for each month of the quarter. The returns are accepted.

A5 ~ The operator reported a total of 481.7 hourly average recordings, with no hourly averages exceeding the 20 mg/m^3 trigger level. The returns are accepted.

Ambient monitoring ~ Ambient monitoring reports received, no reported data gaps within the period, data received for both minerals site boundary locations and both off-site locations. Reports/data accepted.

Waste returns

Waste returns were reported within the reporting window, all received EWC codes are compliant with the permit. The returns are accepted.

Site visit – 12th of September 2025

A site visit was undertaken on the 12th of September to discuss the improvements 7 Steel had

implemented to return the effluent emission at S1 back into compliance, following frequent ELV exceedances during 2024 into 2025. Below is a summary of the investigation and subsequent actions undertaken by the operator.

During April and May of 2025, 7 Steel appointed a third party contractor to undertake a series of trails utilising the existing coagulant, whereby dosing rates were increased with the aim of increasing the efficiency of particulate removal. However, this was unsuccessful and resulted in pH and conductivity issues.

Following the unsuccessful trail utilising the existing coagulant, a new coagulant was trailed. Dosing rates were adjusted over the course of the trial to find an optimum dosing rate. Following the introduction of the new coagulant, samples were obtained for the entirety of August, whereby no exceedances were recorded. The results showed a significant improvement in water quality.

To improve the HOI results, 7 Steel identified areas where improvements could be made to reduce the quantity of oils and greases entering the effluent. The following actions were made.

- New oil skimmer installed on scale pit.
- Grease volume reduced by manual tuning of grease system.
- Daily inspections to check for oil leaks on plant.
- Different cylinders sourced which reduced occurrence of leaks.
- The grease dosing plant was interlocked to the caster – thereby resulting in automation of the grease cut off when the caster was not operating.
- More rigorous inspections during down days.
- Trigger levels for oil consumption, with daily oil use trended.
- Troughs and catch pots introduced to catch oil leaks – preventing mixing with effluent.

The measures implemented by 7 Steel have significantly improved effluent quality and brought this aspect back into compliance. The following action was issued in previous CARs (CAR_NRW0049303, CAR_NRW0048522, CAR_NRW0046686) for various parameters within the effluent that were exceeding their respective ELVs;

"Implement the proposed infrastructure improvements to re-establish compliance with emission limits to the S1 discharge point. Provide NRW with a report detailing the improvements once complete."

This is now considered complete. All previously suspended non-compliance scores will remain suspended and will not be issued against the permit. 7 Steel have been very proactive in addressing the ELV exceedances and shown initiative in identifying and resolving the issues.

Response to actions from CAR_NRW0049303

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The following actions were issued in CAR_NRW0049303, which are presented below for ease of reference.

1. Ensure the functionality of the SD card is captured within the sites procedures to minimise to risk of delayed detection of elevated particulate matter on the A1 stack. Provide NRW with conformation once this has been implemented.

2. 7Steel to provide any documentation detailing the completion of both the one hour fire-watch and clearance of waste which may have accumulated under equipment following plant shutdown on the 09/05/2025 to demonstrate conformance with the sites FPMP on the day the fire occurred. Additionally, provide NRW with a copy of any revised or updated versions of the sites FPMP.

Responses;

1 – 7 Steel reported that an action will be introduced into the maintenance checks to ensure the functionality of the SD card to minimise the risks of delayed detection of elevated TPM from the A1 stack.

2 – The one hour fire watch and waste clearance post shut-down were reported to be completed, however, 7 Steel were not documenting these tasks. 7 Steel have now introduced a daily cleaning and inspection form (7-Steel-Cardiff-Shredder Mill – Daily Cleaning Inspection Schedule Record) and daily use PPM inspection as part of the updated documented process. In addition, 7 Steel have implemented a dedicated evening shift to undertake these tasks, to further reduce the fire risks and enhance safety.

Documenting these tasks provides regulatory assurance allowing verification that procedures are been carried out and the required checks are being completed, in line with the sites FPMP. NRW are satisfied with the response and the measures implemented.

These actions are 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.