Compliance Assessment Report CAR_NRW0050713

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: 31/12/2025.

Parts of permit assessed: 1.1.1(a), 2.1.1, 3.2.1, 3.1.3, 4.1.1(d) (ii).

NRW Lead Officer: Dale Padfield.

Report sent to: ~, Environmental Manager, on 17/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C1 Major	3.2.1
IR1A - Installations - Management - General Management	C1 Major	1.1.1(a)
IR3E - Installations - Emissions and monitoring - Monitoring	C1 Major	3.1.3
IR4B - Installations - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
3	180

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
IR3B	Action 1 ~7Steel to provide an update and timeframe for the temporary capping and drainage works on the EAF dust stockpile. Due 14/03/2026.	14/03/2026

Criteria	Action needed	Complete by
	Action 2 ~ Provide an update and timeframe for the proposed groundwater and soil monitoring. Due 14/03/2026.	
IR1A	Action 3 ~ Review waste management procedure. The waste management procedure should be updated to include the DOB and QT wastes streams. Beyond this, the procedure should be reviewed against site operations and all relevant waste streams should be identified and captured. An updated copy of the procedure should be sent the NRW once the review is completed Action 4 ~ Review the EMS to ensure adequate management of change procedures are in place. Any MOC procedure should ensure appropriate assessments are conducted and any risks are identified and evaluated when when operational changes are made. Provide confirmation when completed.	31/05/2026
IR3E	Action 5 ~ Review the EMS and determine why the requirements of permit condition 3.1.3 have not been met. Any deficiencies should then be addressed, with amendments made to the EMS to reflect and implement the requirements of permit condition 3.1.3. Provide an update at the next compliance meeting. Action 6 ~ In addition to Action 5 above, 7 Steel should risk assess the site and operations in their entirety with regards to permit condition 3.1.3. Where risks cannot be deemed negligible then periodic monitoring should be undertaken. Provide NRW with your findings from the risk assessment	30/06/2026
IR4B	Action 7 ~ 7 Steel shall provide NRW with quarterly updates confirming the total quantities of DOB and QT dusts removed from site (Stockpile) and the total quantity remaining. Reporting shall be made in line with quarterly permit reporting and commence with Quarter 1 of 2026 (in-line with permit condition 4.2.3 ~ within 28 days of the end of the reporting period). Reporting shall continue until the stockpile has been completely removed from the installation in its entirety. First due 28th of April 2026 Action 8 ~ 7 Steel shall provide NRW with quarterly updates on the progress of developing solutions for the remaining stockpiled dusts. Reporting shall be made in line with quarterly permit reporting and commence with Quarter 1 of 2026 (in-line with permit condition 4.2.3 ~ within 28 days of the end of the reporting period). Reporting shall continue until a solution is found / developed and implemented for the	31/12/2026

Criteria	Action needed	Complete by
	remaining stockpiled dusts. First due 28th of April 2026 The deadline will be issued as 31/12/2026 to ensure the actions remain 'open' until NRW are satisfied the actions are 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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

7Steel UK Ltd

EPR/TP3639BH

This compliance assessment report (CAR) details the non-compliance scoring in relation to the illegally stockpiled electric arc furnace (EAF) dust.

Background summary

Background information is detailed in CAR_NRW0046028, however a summary is provided below.

Electric arc furnace (EAF) dust is generated during steel production from the volatilisation and condensation of metals and other materials in the high-temperature furnace. The EAF dust and fume are captured within the dedicated fume extraction system, which directs the flow through a series of abatement plant before discharging at the dedicated stack.

Dust composition: The dust is primarily composed of various metal oxides, with iron oxides being the most prevalent and magnesium and calcium oxides make up a smaller proportion. Other metals include zinc (most prevalent following iron) and trace amounts of lead, manganese, magnesium, copper, nickel, aluminium, chromium, (both trivalent and hexavalent), cadmium, titanium, potassium, arsenic, beryllium, antimony and others.

The fume extraction and abatement systems at the facility result in the collection of three separate EAF dust fractions. An initial fraction is collected within the 'drop out box' (DOB) positioned closest to the furnace, collecting larger or heavier fractions from the gas stream. A second fraction is non-intentionally collected within the quench tower (QT), requiring frequent removal to ensure the continued functionality of the quenching process. A final fraction is collected at the dedicated de-

dusting plant, whereby particulate matter is removed via bag filtration and collected and stored in dedicated sacks.

The EAF dust fraction arising from the de-dusting plant is consigned as a hazardous waste (European Waste Catalogue (EWC) Code 10 02 07) via Transfrontier shipment (TFS) to a recovery facility abroad, where it undergoes processing to recover the zinc content.

Due to differing physical properties, the EAF dust fractions arising from the QT and DOB have a lower zinc content, which make it undesirable for the onward recovery process. The operator began stockpiling the QT and DOB EAF dusts at the 'minerals site' located South of Roverway. The operator has stated that this practice has been ongoing for a considerable time >20 years, which has resulted in the accumulation of an estimated 30,000 Tonnes of EAF dust on the 'minerals site'. The EAF dust wastes have been stored as an open stockpile on un-made ground.

Permit non-compliances

The following permit conditions are deemed to have been contravened:

Permit Condition 3.2.1 – *Emissions of substances not controlled by emission limits shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.*

A report submitted by the operator (EAF Material - Waste Assessment Celsa Manufacturing (UK) Ltd, Tremorfa New Melt Shop, Tremorfa Works, Seawall Road, Cardiff, CF24 5TH) date July 2024 details various characteristics of the EAF dust, local geology and environmental setting.

A key aspect detailed within the report is the leachability characteristics of the EAF dust, both at the stockpile and newly generated dust from the quench tower (QT) and drop out box (DOB). The leachability analysis determines the concentration of substances that are able to leach or migrate out of the EAF dust, from the solid to the liquid phase and be released into the surrounding environment.

As detailed in the report, various chemical and environmental factors can influence the leaching potential of a material, however the results provide an indication on the potential for various substances to leach from the EAF dusts. The table below summarises the maximum results provided in section 5 of the above mentioned report.

Table 1: Summary of maximum leachate results

Sampling Area	Cadmium (µg/l)	Chromium (Hexavalent) (µg/l)	Copper (µg/l)	Lead (µg/l)	Zinc (µg/l)

EAF Quench	3	2700	7.6	28000	8200
EAF Mound Surface	2.4	510	11	21	160
EAF Mound (1 m bgl)	0.47	77	55	86	360
EAF Base Geology (Background)	0.21	120	28	9.1	9.1

The six metals above are listed as priority substances under Water frame work directive (WFD) for estuarine and coastal waters. The leachability tests demonstrate that various hazardous metals are capable of being leached from the EAF dust wastes at significant concentrations.

The site sits above an aquifer classified as a 'Secondary B Aquifer' which are described as a lower permeability geological layers that can store and yield only a limited amount of groundwater through localized features like fissures, thin permeable layers, or weathering. The operator operates an abstraction license authorising the abstraction of 142,715m^3 a year with quantities not exceeding 391 m^3 a day. Although the classification of aquifer suggests limited capability, the aquifer is able to meet the supply demands of the site, demonstrating that the aquifer is reasonably productive.

Although actual contamination has not yet been confirmed, NRW's assessment is based on the potential impact of the current storage arrangements. The COMAH CDOIF report (Celsa Steel (UK) Ltd Environmental Risk Assessment Report No: 314406.03) submitted by the operator identifies the EAF dust stockpile as a potential Major Accident to the Environment (MATTE) scenario. This assessment assigns a severity rating of "Severe 2" and a duration rating of "Long Term 3," indicating that unmitigated consequences could result in persistent groundwater contamination lasting decades. The site sits above a Secondary B aquifer, which supplies the operator's abstraction needs, demonstrating a viable receptor. The presence of a source (EAF dust), pathway (unmade ground allowing infiltration), and receptor (soil and groundwater) establishes a credible risk of pollution as defined under the Environmental Permitting Regulations:

Under the Environmental Permitting Regulations, pollution is defined as any emission resulting from human activity which may:

a. Be harmful to human health or the quality of the environment;
b. Cause offence to a human sense;
c. Result in damage to material property; or
d. Impair or interfere with amenities or other legitimate uses of the environment

The EAF dust contains hazardous metals including lead, cadmium, chromium (VI), copper, and zinc, all of which are listed as priority substances under the Water Framework Directive. Leachability tests confirm that these substances can migrate from the dust into the environment at significant concentrations:

- Lead: up to 28,000 µg/L

- Chromium (VI): up to 2,700 µg/L
- Zinc: up to 8,200 µg/L

These concentrations far exceed relevant environmental quality standards and pose a credible risk of groundwater contamination. The potential impact includes long-term persistence over decades and extensive spread, with contamination plumes predicted to extend beyond 50 metres. The site is located above a Secondary B Aquifer, which supplies the operator's abstraction needs, demonstrating the presence of a viable receptor. The combination of a source (EAF dust), pathway (leaching through unmade ground), and receptor (soil and groundwater) confirms a pollution scenario under the Environmental Permitting Regulations.

This situation meets the criteria for a non-compliance because the uncontrolled storage of EAF dust creates a *reasonably foreseeable potential* for pollution. The material is capable of generating leachate with contaminants at levels that could harm groundwater quality or impair its legitimate uses. Based on the credible risk demonstrated through leachability data and the outcome of the risk assessment, the operator has failed to adequately prevent or minimise potential emissions, thereby breaching permit condition 3.2.1. This assessment reflects the potential environmental impact in accordance with NRW guidance.

NRW has determined that appropriate measures were **not** in place at the time of the non-compliance. The operator's Environmental Management System (EMS), specifically the waste management procedure ECP14, demonstrates significant gaps in identifying and managing hazardous waste streams. Revision 9 of ECP14, dated April 2023, does not reference the Electric Arc Furnace (EAF) dust arising from the QT and DOB processes. Earlier versions, such as revision 8 from April 2019, include a diagram of the EAF dust stream but fail to provide any detail on the production or fate of these fractions. Other sections of the procedure address EAF baghouse dust but omit any mention of QT or DOB dusts, indicating a systemic failure to capture all hazardous waste streams within the management system.

ECP14 includes specific requirements that were not implemented. Section 3.1.7 requires maintaining a register of hazardous waste movements, including removal, transport, intermediate storage, and disposal or recovery. It also requires records where hazardous waste is disposed of or recovered on-site. Section 3.1.2 states that all waste must be stored and disposed of responsibly. These obligations were not met in relation to the QT and DOB EAF dusts, which were stockpiled on unmade ground without containment or drainage, contrary to both internal procedures and regulatory expectations.

Safety Data Sheets (SDS) produced by the operator reinforce the hazardous nature of these wastes. The SDS for EAF dust (revision 4, December 2013) classifies the material as ecotoxic (H12) and specifies that it must be stored in appropriate containers, labelled and dated, in a cool, dry area away from incompatible substances. SDS documents for QT and DOB dusts, dated March 2023, include warnings such as "Toxic to aquatic life" and "Do not allow dust run-off to enter watercourses." Disposal guidance identifies the waste as EWC 10 02 07 or 10 02 08 and confirms its hazardous classification under WM3 criteria. Despite these clear instructions, the operator failed to apply the required controls.

The permit itself, through Table S1.2, requires adherence to operating techniques and relevant

guidance, including waste management plans and sector guidance such as S5.06. These measures were not applied to the QT and DOB dust streams, representing a breach of permit conditions and a failure to implement appropriate measures.

NRW considers that appropriate measures were not in place because the operator failed to implement basic and widely-recognised controls for hazardous waste storage. As a minimum, effective management of hazardous particulate wastes such as EAF dust requires: storage on an impermeable surfaced area with drainage containment to prevent infiltration; use of sealed or covered containment to prevent water ingress and dust mobilisation; segregation from incompatible materials; clear labelling and inventory control; and implementation of an EMS that accurately identifies, records, and manages all hazardous waste streams. These expectations should be reflected in the site's own EMS (ECP14), Safety Data Sheet storage instructions, and standard sector guidance. None of these measures had been applied to the QT and DOB dusts, which were instead stockpiled directly on unmade ground without containment, creating a clear and foreseeable risk of leachate generation and pollution.

With regards to the MATTE B Scenario outlined in the Celsa Steel (UK) Ltd Environmental Risk Assessment Report No: 314406.03, the CDIOF guidance (Environmental Risk Tolerability for COMAH Establishments Guideline) provides further interpretation on how the severity and duration figures are derived. Within this guidance '*Table 4.1 - Severity/Harm criteria for consideration as a major accident (based on unmitigated consequence)*' quantifies a severe rating for groundwater with the following criteria – 1 to 100ha of aquifer where water quality standards are breached (or hazardous substance is discernible).

For the duration figure, *Table 4.2 – Duration/Recovery criteria (based on unmitigated consequence)* the long term criteria is defined as WFD (Water framework Directive) hazardous substances present >6years and WFD non-hazardous substances present >10 years.

These criteria have been assessed against Natural Resources Wales (NRW) Categorisation guidelines for impact on groundwater quality. The following criteria are those described as a category 1 Major impact: Persistent groundwater impacts, described as contamination being measured in decades or even centuries depending on various chemical and physical factors, but extent and severity must also be considered.

Extent: Extensive groundwater impacts, described as having volumes or concentrations that are likely to result in a contamination plume extending beyond 50m in any aquifer.

Severity: Significant impact criteria are described as the exceedance of any relevant quality standard for hazardous or non-hazardous pollutants at a borehole, well or spring supply for human consumption, or hazardous substances discernible above pre-existing levels in the groundwater beyond 50m in any aquifer.

The MATTE B scenario outlined within the Celsa CDOIF Report (No: 314406.03) is therefore equivalent to a category 1 major impact on water quality.

To conclude, the operator has breached Permit Condition 3.2.1 because:

- Appropriate measures were not employed to prevent or minimise emissions from the EAF dust stockpile; and
- There is a credible potential for pollution to soil and groundwater, supported by leachability data and risk assessment.

In accordance with NRW's compliance scoring guidance, this constitutes a **Category 1 major non-compliance** due to the potential for significant and long-term environmental harm. This will be issued against **permit condition 3.2.1**.

Permit Condition 2.1.1 – *The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").*

Activity A10 Electric Arc Furnace Dust Storage and Handling – The maximum permissible storage of EAF Dust (EWC 10 02 07) is limited to a 1000 tonnes at any one time.

This storage limit was imposed on the operator as means to prevent the accumulation of hazardous waste which may have resulted in 'future legacy waste issues'. Evidently, the operator failed to comply with this permit condition and is now in a position of having to deal with a legacy waste issue and having to explore options to prevent further accumulation. The operator has accumulated 30,000 tonnes, far exceeding the permitted limit. Non compliance scoring is captured under permit condition 1.1.1(a) below.

Permit Condition 1.1.1 (a): *The operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.*

The root cause of any permit non-compliance must also be investigated and assessed. As detailed above, the management system has failed to identify and reduce the risk of pollution in relation to the stockpiling of EAF dusts from the QT and DOB, with the failure to include these wastes streams within the sites waste management procedures.

It is understood that the operator was in favour of seeking a recovery route for these problematic EAF dust streams, to recover the high metal content and avoid diverting a potential resource to landfill. It is believed that this is why the stock piling of the EAF dust began. However, this practice had continued for a prolonged time, with the operator estimating a timeline of 20 years. This has inadvertently resulted in operator creating an illegal hazardous waste landfill, as defined in the Landfill Regulation (England and Wales) 2002. As described in Part 1, Section 3, the landfill directive applies to any site in which waste has been disposed or deposited in or on land, including any site which has been used for the temporary storage of waste for more than a year prior to disposal or more than three years prior to recovery or treatment.

The operator failed to account for this, with no mechanism or procedures in place to ensure any waste arising from the operations was not being stored illegally.

The permit was updated and consolidated in 2012, with three permits (TP3639BH, EPR/BU2098IP & EPR/WP3699FQ) consolidating into a single permit (EPR/TP3639BH). When issued as EPR/TP3639BH and consolidated in 2012, a limit of 1000 tonnes of EAF dust (EWC code 10 02 07) was imposed on the operator as means to prevent any future legacy waste issues. The operator has failed to account for the QT and DOB EAF dusts in the tonnage total being held at the facility, likely a result of the waste not being captured or identified within any of the waste management procedures.

The area in which the DOB and QT EAF dust stockpile is situated would have been captured within the curtilage of the 'Mill services' permit EPR/WP3699FQ which was held and operated by Celsa. The activities controlled by this permit were primarily the sorting of slag and mill scales along with various EWC codes for various scrap and construction and demolition wastes. However, hazardous wastes and wastes consisting mainly of dusts, powders or loose fibres were prohibited from acceptance onto site under that permit. Therefore, the operator had either breached the conditions of the pre-existing permit, allowing the acceptance and accumulation of a non-authorised hazardous waste on the site, or have made a mistake in their estimate of the timeframe over which the waste accumulation is believed to have taken place. The DOB and QT EAF dusts are reported to be generated at a rate of approximately 300 tonne/month, with an approximate 30,000 tonnes now accumulated on the site, this would suggest the 'stockpiling' likely began post 2012, which aligns with historic satellite imagery of the site.

The operator has failed to identify the potential environmental risk of storing the EAF dusts as an open stockpile on unmade ground. The dust is known to be hazardous, by the evaluation of the operators own assessments, however the QT and DOB dust streams have not been handled or managed as would be expected or as is required for a hazardous waste. As detailed earlier in this report, the operator has procedures detailing the various waste streams, classification of wastes, storage requirements and the requirement to comply with relevant legislation. However, the operator failed to apply these aspects to the DOB and QT EAF dusts. The potential for hazardous and non-hazardous substances to leach from the waste and pollute the surrounding soil and groundwater had not been evaluated or accounted for.

Broadly the above would suggest that the operator has failed in its duty of care requirements, but why this has happened is less clear. It would appear that following consolidation of the various permits the operator began using an area of land previously within the 'Mill services' permit boundary to store the QT and DOB EAF dusts. Prior to the stockpiling, the fate of these waste streams is unclear. However, a change occurred whereby the pre-existing 'normal operations' with regards to the QT and DOB dusts ceased and the stockpiling of the dusts on the minerals site began.

The operator failed to implement a Management of Change (MOC) process when altering waste handling arrangements for QT and DOB EAF dusts. This change, moving from previous disposal/recovery routes to long-term stockpiling on unmade ground was not subject to any documented assessment of environmental risk, legal compliance, or operational controls. As a result, the management system did not identify or minimise the risk of pollution, contrary to Permit Condition 1.1.1(a). The omission of MOC meant that waste management procedures were not updated to capture

these streams, and the risks associated with hazardous dust stockpiling were overlooked during subsequent reviews. This failure has led to the creation of an illegal hazardous waste landfill and presents an ongoing risk of soil and groundwater contamination. Best practice under ISO 14001 and recognised EMS guidance requires that significant operational changes trigger a formal review of environmental aspects, legal requirements, and control measures; this did not occur. The lack of ongoing review allowed the situation to persist as 'normal operation,' resulting in significant environmental risk.

In accordance with NRW's compliance scoring guidance, this constitutes a **Category 1 major non-compliance** due to the potential for significant and long-term environmental harm. This will be issued against permit conditions against permit condition **1.1.1(a)** for failing to identify and minimise the risk of pollution. Permit condition **2.1.1** for exceeding the permitted storage quantity of EWC code 10 02 07. **These will be consolidated into a single category 1 non-compliance issued against permit condition 1.1.1(a).**

Permit Condition 4.1.1(d) (ii) – *Records to be retained until permit surrender in relation to matters which affect the condition of the land or groundwater.*

The operator has stated that they have been unable to locate base-line site condition reports relating to the 'minerals site'. As such, information relating to the established base-line of the site, particularly that relating to the area in which the EAF dust stockpile is located, are not available. During 2012, the new BAT conclusions were published for the iron and steel sector, triggering a permit review for the installation. One aspect of the review was ensuring the site had sufficient soil and groundwater data to establish a base-line. This would allow preexisting contamination to be established and provide a base-line for the site. This baseline could then be compared during permit surrender and ongoing monitoring, to demonstrate that the activities were not leading to a deterioration in soil or groundwater quality, as established during the baseline. A regulation 60(1) request for information was sent to the operator following publication of the BAT conclusions, a response and covering letter was received form the operator dated 30/04/2014. Within the covering letter, the operator stated that the existing site condition reports remain relevant and the base-line data available for the state of the groundwater and soil was current.

Without sufficient baseline data, the operator would be regarded as responsible for any contamination present, which would need to be addressed before the permit could be surrendered. It is appreciated that this location has been subject to a history of heavy industry and pre-existing contamination is possible. The missing base-line data is going to require further consideration to determine an appropriate way forward.

This aspect will be considered further once the monitoring has been undertaken and site condition investigation report is available.

Permit Condition 3.1.3 - *Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the*

risk of contamination.

The operator has failed to undertake the 5 and 10 yearly soil and groundwater monitoring in line with permit condition 3.1.3. The permit condition states that the monitoring may be based on the systematic appraisal of risk, as such, the 5 and 10 yearly requirements may be lengthened or shortened on a risk based approach. However, any deviation from the minimum 5 and 10 yearly requirements would require a formal request to NRW and be supported by a risk assessment to justify not undertaking the monitoring, this has not been done.

Permit condition 3.1.3 is used to demonstrate compliance with various aspects of the Industrial Emissions Directive (IED), whereby it is necessary to ensure the operation of an installation does not lead to a deterioration in the quality of the soil and groundwater. The monitoring at appropriate intervals is intended as an early detection method, to identify soil and groundwater pollution at an early stage, thereby allowing appropriate corrective measures to be implemented, mitigating potential impacts.

The operator has undertaken various soil and groundwater campaigns since this permit condition was introduced in 2012, following implementation of the sector 'best available techniques' (BAT) conclusions document . However, this monitoring has been in relation to gathering data to support various permit variations to introduce new activities, i.e., baseline site condition reports to support the variation applications.

Dialog held with the operator following the initial request for groundwater and soil monitoring to be undertaken demonstrated that the operator had not considered this permit condition. Furthermore, the operator has not considered the installation as a whole in terms of potential risk of pollution to soil or groundwater from the activities.

This has resulted in a missed opportunity for early detection of pollution arising from the stockpiled EAF dust. A site and operations wide risk evaluation of potential sources of pollution to soil and groundwater and/or subsequent monitoring may have identified pollution or the risk of pollution from the EAF dust stockpile, potentially as early as 2017. As there is a known source that has the potential to cause significant environmental harm, the failure to undertake the requirements of permit condition 3.1.3 are seen as significant.

In accordance with NRW's compliance scoring guidance, this constitutes a Category 1 major non-compliance because the failure to undertake periodic soil and groundwater monitoring removed a key early-warning mechanism, allowing a known high-risk source (EAF dust) to remain undetected for years, creating a reasonably foreseeable potential for serious, persistent, and extensive groundwater contamination.

A Category 1 non-compliance is issued against permit condition 3.1.3 for the operator failing to undertake the requirements of the permit condition.

Acknowledgement of actions undertaken by the operator

Since the issue has been brought to NRWs attention the operator has enacted a number of actions to

bring the situation back into control and make steps to returning to compliance. The primary concerns were:

1. The potential for the continued leaching of pollutants from the stockpile.
2. The fate of the QT and DOB EAF dusts which continue to be unavoidably produced during the operations.
3. Removal and fate of the stockpiled QT and DOB dusts.

To address point 1, the operator has proposed and is in the process installing a temporary capping and drainage system, similar to that used on landfills. This is will prevent any further infiltration of water, reducing the leaching potential of pollutants from the waste whilst the operator identifies a suitable outlet for the stockpiled dusts.

To address point 2, in the short term the operator has sought a viable recovery option and has a contract in place for the continued removal of the newly generated dusts. As a longer term solution, the operator has sought a permit variation, which will enable the QT and DOB dusts to be treated and returned to the main EAF dust stream within the bagging plant, whereby it will be removed from site along with the primary bag house dusts.

To address point 3, the operator has signed a contract with the recovery company who receive the primary bag house dust, for the removal of 10,000 tonnes of the stockpiled dusts. Further work is being carried out to in terms of options for the remaining 20,000 tonnes.

A ground investigation to include soil and groundwater monitoring within the vicinity of the stockpile has been planned which will provide some insight on the actual conditions and provide indication on any actual contamination present.

Actions: 7 Steel – 17th February 2026:

1. 7Steel to provide an update and timeframe for the temporary capping and drainage works on the EAF dust stockpile. **Due 14/03/2026.**

2. Provide an update and timeframe for the proposed groundwater and soil monitoring. **Due 14/03/2026.**

3. Review waste management procedure. The waste management procedure should be updated to include the DOB and QT wastes streams. Beyond this, the procedure should be reviewed against site operations and all relevant waste streams should be identified and captured. An updated copy of the procedure should be sent the NRW once the review is completed. **Due 31/05/2026**

4. Review the EMS to ensure adequate management of change procedures are in place. Any MOC procedure should ensure appropriate assessments are conducted and any risks are identified and evaluated when operational changes are made. Provide confirmation when completed. **Due 31/05/2026**

5. Review the EMS and determine why the requirements of permit condition 3.1.3 have not been met. Any deficiencies should then be addressed, with amendments made to the EMS to reflect and implement the requirements of permit condition 3.1.3. Provide an update at the next compliance meeting.

6. In addition to Action 5 above, 7 Steel should risk assess the site and operations in their **entirety** with regards to permit condition 3.1.3. Where risks cannot be deemed negligible then periodic monitoring should be undertaken. Provide NRW with your findings from the risk assessment. **Due 30/06/2026**

7. 7 Steel shall provide NRW with quarterly updates confirming the total quantities of DOB and QT dusts removed from site (Stockpile) and the total quantity remaining. Reporting shall be made in line with quarterly permit reporting and commence with Quarter 1 of 2026 (in-line with permit condition 4.2.3 ~ within 28 days of the end of the reporting period). Reporting shall continue until the stockpile has been completely removed from the installation in its entirety. **First due 28th of April 2026**

8. 7 Steel shall provide NRW with quarterly updates on the progress of developing solutions for the remaining stockpiled dusts. Reporting shall be made in line with quarterly permit reporting and commence with Quarter 1 of 2026 (in-line with permit condition 4.2.3 ~ within 28 days of the end of the reporting period). Reporting shall continue until a solution is found / developed and implemented for the remaining stockpiled dusts. **First due 28th of April 2026**

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: 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.