

Compliance Assessment Report CAR_NRW0051485

Permit being assessed: EP3830GH.

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

At: Corporation Road, Newport, NP19 4XE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/03/2026 between 10:00 and 13:00.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson, accompanied by Luke Burton.

Report sent to: Redacted, Resources and Compliance Manager, on 14/04/2026.

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	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR2A - Installations - Operations - Permitted activities	Action only (X)	
IR2C - Installations - Operations - Operating techniques	C3 Minor	2.3.1
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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	<p>While combustible waste continues to be stored on site, the operator shall either:</p> <p>1) Repair the thermal imaging cameras and reinstate thermal monitoring in accordance with Fire Prevention and Mitigation Plan, OR</p> <p>2) Submit in writing, for NRW approval, an updated Fire Prevention and Mitigation Plan, detailing the new controls measures for monitoring combustible materials stored on site.</p> <p>Note – if all combustible waste is removed from site by the end of June and providing there are no plans to receive and store combustible waste on-site, the above actions will not be necessary. However, the operator must immediately notify NRW of any intention to receive combustible waste. In such circumstances, NRW will assess the control measures identified in the FPMP, emergency services to extinguish a fire and the resultant environmental impact.</p>	30/06/2026
IR1A	The operator shall return to compliance with NRW guidance on permitted stockpile dimensions for combustible waste (i.e., reduce the stockpile length to $\leq 20\text{m}$ with a minimum separation distance of 6m between separate stockpiles).	29/05/2026
IR2A	The operator shall identify the content of the steel drums and implement control measures identified in management control plans to prevent any risk of pollution to the environment.	30/04/2026
IR2C	The operator shall submit to NRW for written agreement a schedule for the safe disposal of all RDF stored on site.	30/04/2026
IR2C	The operator shall implement the schedule to remove all unpermitted RDF from site.	30/06/2026
IR2C	The operator shall provide a schedule for the safe disposal of the end-of-life tyres to ensure compliance with the requirements of Table S1.1 (i.e., waste cannot be stored on-site for longer than 9 months).	30/04/2026
IR3A(1)	The operator shall investigate the root cause of the high pH surface water at emission point W1. Submit investigation findings to NRW outlining proposed control measures to prevent further pH ELV exceedances.	30/06/2026

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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (NRW) announced site inspection at Liberty Steel Newport Limited (the operator) on 25 March 2026.

The inspection focussed on recent non-compliance matters (i.e., pH limit exceedances and issues relating to RDF storage) subsistence fees and permit variation requirements following the sale of land to a third party.

This inspection also provided an opportunity for the recently appointed Industry Regulation Officer, responsible for regulating this site, to become familiar with site operations and activities and to meet the Liberty Steel management team.

The operator provided a comprehensive site walk through, including the waste storage area, hot strip mill and reheating furnace, water treatment system and the surface water drainage system which is connected to emission monitoring point W1.

It should be noted that none of the activities listed in Table S1.1 of the environmental permit were operational during the inspection. The electric arc furnaces and, Delta and Epsilon mills have been removed from site. The Gamma mill has been idle from February 2023 but is being maintained by a small multi-disciplinary team in readiness for any future resumption of operations.

General Management (IR1A)

Environmental permit condition 1.1.1

The operator shall manage and operate the activities:

(a) 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.

Following the site inspection, a desk-based assessment of the Fire Prevention and Mitigation Plan (FPMP) was carried out with consideration given to the information shared and observations made during the site inspection. The FPMP is a key management system document which identifies both hazard specific and general control measures for the safe receipt, storage and despatch of waste materials. Examples of control measures to reduce the risk of self-combustion include:

Hazard Specific

- The operator must complete daily checks of stockpile face temperatures using a thermal camera or temperature probe to identify 'hotspots'.

General

- All combustible waste must be stored in accordance with NRW Guidance i.e., restrict stockpile size and introduce fire breaks within the waste piles to prevent fire migration. The table below provides maximum stack sizes and minimum separation distances:

Primary Materials (description)	Max Height (m)	Max length/width (m)	Max. volume (m ³)	Max Area (m ²)	Min Separation (m)
Combustible materials (EWC 19 12 10 SRF/RDF)	5	20	450	235	6

Compliance Assessment

- The thermal imaging camera is no longer operational for monitoring the stockpile face temperature which represents non-compliance with the environmental permit, however, the operator explained that security staff undertake a fire-watch patrol every 2 hours (24 hours per day) and record observations on a monitoring form. Consequently, no non-compliance score will be levied against this permit condition breach.

Action: While combustible waste continues to be stored on site, the operator shall either:

- 1) Repair the thermal imaging cameras and reinstate thermal monitoring in accordance with Fire Prevention and Mitigation Plan, OR
- 2) Submit in writing, for NRW approval, an updated Fire Prevention and Mitigation Plan, detailing the new controls measures for monitoring combustible materials stored on site.

Note – if all combustible waste is removed from site by the end of June and providing there are no plans to receive and store combustible waste on-site, the above actions will not be necessary. However, the operator must immediately notify NRW of any intention to receive combustible waste. In such circumstances, NRW will assess the control measures identified in the FPMP, emergency services to extinguish a fire and the resultant environmental impact.

- The refuse derived fuel (RDF) stockpile length exceeds the maximum allowable length, which represents non-compliance with the environmental permit (see storage area photo below).



Compliance Classification Scheme: As a result of this non-compliance with permit conditions 1.1.1, a CCS score [C3] has been recorded against sub-criteria IR1A – Management – General Management.

Justification: A C3 score has been levied as it is reasonably foreseeable that exceeding the permitted stockpile dimensions will have a minor impact on the ability of the emergency services to extinguish a fire.

Action: The operator shall return to compliance with NRW guidance on permitted stockpile dimensions for combustible waste (i.e., reduce the stockpile length to ≤ 20m with a minimum separation distance of 6m between separate stockpiles).

Permitted Activities (IR2A)

Environmental permit condition 2.1.2:

For the following activities referenced in schedule 1, table S1.1 (A1 to AR15) waste authorised by this permit shall be clearly distinguished from any other waste on the site.

Compliance Assessment

- During the site inspection, six sealed steel drums were observed in the waste storage area. As there were no labels on the drums and the operator was unable to identify their content, it could not be concluded if the drums contained waste. Consequently, no non-compliance score will be levied.



Action: The operator shall identify the content of the steel drums and implement measures identified in management control plans to prevent any risk of pollution to the environment.

Operating Techniques (IR2C)

Environmental permit condition 2.3.1:

a. For the following activities referenced in schedule 1, table S1.1 (A1 - AR15) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

Table S1.1 (Activities) to the environmental permit is partially reproduced below

Table S1.1 Activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of the specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
Description of activities for waste operation		Limits of activities	
AR14	<p>R13 Storage of wastes pending any of the recovery operations numbered R1 to R12.</p> <p>Receipt and storage of commercial and industrial wastes, excluding those wastes which are hazardous</p>	<p>Receipt of waste and storage on site prior to recovery via use as a fuel in a Waste to Energy plant or export for recovery.</p> <p>Subject to the storage limitations of 10,000 tonnes of SRF and 50,000 tonnes of other waste derived fuel, ASR, waste plastic, waste tyres at any given time.</p> <p>Waste will be stored on-site for a maximum of up to 9 months. To be stored on a concrete platform</p>	

		with a sealed drainage system. Waste types as specified in schedule 2, table S2.1
--	--	--

Table S2.1 (Permitted waste types and quantities for) to the environmental permit is partially reproduced below

Table S2.1 Permitted waste types and quantities for	
Waste code	Description
19 12 10	Combustible waste (refuse derived fuel) – dry baled and triple packaged RDF and SRF only

Compliance Assessment

Refuse Derived Fuel (RDF) – operator estimate approx. 500 tonnes



Note – the operator informed NRW that approx. 500 tonnes of RDF has been removed from site in the past month (i.e., March 2026).

- The RDF observed in the waste storage area was loose and not triple packed which represents non-compliance with the environmental permit.

Compliance Classification Scheme: As a result of this non-compliance with permit conditions 2.3.1, a CCS score [C3] has been recorded against sub-criteria IR2C – Operations – Operating Techniques.

Justification: A C3 score has been levied as it is reasonably foreseeable that storage of loose / unpacked RDF will have a minor impact on pollution of the local environment.

Action: The operator shall:

- 1) Submit to NRW for written agreement a schedule for the safe disposal of all RDF stored on site.
- 2) Implement the schedule to remove all unpermitted RDF from site by the end of June.

- The operator confirmed that the RDF stockpiles have been stored on site in excess of the permitted 9 month maximum duration, which represents non-compliance with the environmental permit.

Compliance Classification Scheme: As a result of this non-compliance with permit conditions 2.3.1, a CCS score [C3] has been recorded against sub-criteria IR2C – Operations – Operating Techniques.

Justification: A C3 score has been levied as it is reasonably foreseeable that prolonged storage of loose / unpacked RDF will have a minor impact on pollution of the local environment.

Action: As per previous action.

End of Life Tyres



- A stockpile of end-of-life tyres was observed in the waste storage area.

Action: The operator shall provide a schedule for the safe disposal of the end-of-life tyres to ensure compliance with the requirements of Table S1.1 (i.e., waste cannot be stored on-site for longer than 9 months).

Consolidation of Non-Compliance Scores

The above CCS scores for non-compliance with permit condition 2.3.1 will be consolidated into a single non-compliance score as per the compliance classification scheme.

Emissions and Monitoring (IR3A)

Environmental permit condition 3.1.2 states:

The limits given in schedule 3 shall not be exceeded.

Schedule 3 Table S3.2 to the environmental permit is partially 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 (inc. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 on the site plan in schedule 7 emission to St Julian's Pill	Clean un-contaminated surface water	pH	6 - 10	Spot Sample	Monthly	BS 6068-2.50:1995, ISO 10523:1994

Compliance Assessment

Point Source Emissions to Water – W1

- In 2025, the emission limit value for pH was exceeded on 2 occasions (i.e., 10.7 on 09 January 2025 and 11.0 on 19 December 2025). While these incidents have previously been reviewed and non-compliance scores levied, it is unclear to NRW why and how the pH of *clean, un-contaminated surface water*, is so high at emission point W1.

Action: The operator shall investigate the root cause of high pH surface water at emission point W1 and submit investigation findings to NRW outlining proposed control measures to prevent further pH ELV exceedances.

Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

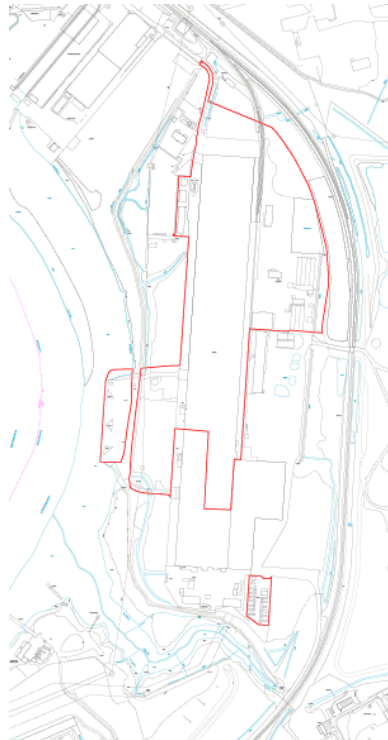
Regulatory Advice

RDF Accountability

On 3 December 2025, the operator informed NRW that the land on which assets associated with permitted activities are situated, has been sold to a third party. However, this sale provides for the on-going leasing of land and the right to occupation by Liberty Steel, albeit the leased area of land is smaller than the permitted area displayed in Schedule 7 site plan of the environmental permit (see below).

Permitted Site Plan (green border)

Leased Area (red border)



The area of land occupied by the third party includes the waste storage area where the refuse derived fuel (RDF), end of life tyres and other waste materials are stored. Although the third party has agreed to take responsibility for the disposal of these waste materials, NRW advised the operator that they will continue to be accountable for the waste if it remains within their permitted site. Consequently, the operator will continue to receive non-compliance scores for permit condition breaches relating to waste storage issues until the material is safely removed from site.

Permit Variation

NRW advised the operator on permit variation options (see below), however, the operator needs to confirm which (if an) option they wish to pursue. NRW will then advise accordingly in line with policies and procedures.

- Partial transfer of part of the permit to a different operator
- Partial surrender of an area of the permit
- Total surrender of the permit

Useful links:

[Natural Resources Wales / Pre application advice for environmental permits environmental-permitting-charging-scheme-2026-27.pdf](#)

Permit Subsistence Fees

Due to the non-operational status of plant, the potential for an abatement of the annual subsistence charge was discussed. NRW advised the Operator that the subsistence charge cannot be reduced while longstanding non-compliance relating to RDF storage remains unresolved and outstanding fees remain unpaid. However, as soon as both issues are resolved, NRW will reconsider the operators request for an abatement of charges.

[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.