

Compliance Assessment Report CAR_NRW0051667

Permit being assessed: EP3830GH.

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

At: Corporation Road, Newport, NP19 4XE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 01/05/2026.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Resources and Compliance Manager, on 11/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C4 No impact	4.3.2 (b)(i) and 4.3.3

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

Total non-compliances recorded	Total non-compliance score
2	4.1

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR3A(1)	The operator shall undertake measures to prevent the reoccurrence of a pH exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification	Already completed

Criteria	Action needed	Complete by
IR4C	The operator shall ensure that all future schedule 5 Part A (b) notifications are immediately submitted to NRW following the detection of a permitted limit exceedance.	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

Assessment Details

This Compliance Assessment Report (CAR) is a record of Natural Resources Wales' (hereafter NRW) assessment of Liberty Steel Newport Limited's (hereafter the operator) Q1 2026 [January to March] Water 1 and Air 1 reporting forms against the relevant environmental permit conditions for Reporting, Emissions & Monitoring and Notifications.

Documents submitted by the operator

- Document reference – *Water 1 Q1 2026.pdf* (submission date – 28 April 2026)
- Document reference – *Air 1 Q1 2026.pdf* (submission date – 28 April 2026)
- Document reference – *exceededce [sic] report Q1 2026.pdf* (submission date – 28 April 2026)

Report Structure

Compliance Criteria (e.g., IR4B, IR3A, IR4C...etc.)

- a. Permit Condition
- b. Compliance Assessment
 - Compliance Classification Scheme (CCS)
 - Justification
 - Action
- c. Consolidation of Non-Compliance Score
- d. Root Cause Analysis (when applicable)

IR4B – Information – Reporting

(a) Permit Condition

The purpose of this section is to record environmental permit condition breaches arising from incorrect or late reporting of emission monitoring data. Condition **4.2.3** of the environmental permit states:

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

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in*

schedule 4 table S4.4; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 of Schedule 4 (Reporting of monitoring data) to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air parameters as required by condition 3.5.1	A1, A2 and A5	From 3 to 12 months	/
Emissions to water parameters as required by condition 3.5.1	W1	Every 3 months	/

Table S4.4 of Schedule 4 (Reporting forms) to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	01/04/2016
Water	Form water 1 or other form as agreed in writing by Natural Resources Wales	01/04/2016

(b) Compliance Assessment

Point Source Emissions to Air – A1, A2 and A5

1. The reporting form for emissions to air was submitted by the operator via email on 28 April 2026 (document reference: *Air 1 Q1 2026.pdf*)
2. The reporting form was submitted inside the 28-day reporting window which represents compliance with the environmental permit.
3. The reporting form submitted is for the reporting period specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.
4. The reporting form does not include results for all parameters and emission points specified in Schedule 4 Table S4.1 as the activities giving rise to emissions from points A1, A2 and A5 were not in operation during the reporting period and did not generate any emissions to air. This represents compliance with the environmental permit.

Point Source Emissions to Water – W1

5. The reporting form for emissions to water was submitted by the operator via email on 28 April 2026 (document reference: *Water 1 Q1 2026.pdf*)
6. The reporting form submission was made inside the 28-day reporting window which represents compliance with the environmental permit.
7. The reporting form submitted is for the reporting period specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.
8. The reporting form includes results for all parameters and emission points specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 4.2.3.*

Justification: *NA*

Action: *no action required*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

IR3A(1) – Emissions and Monitoring – Emissions to Water

(a) Permit Condition

The purpose of this section is to record environmental permit condition breaches arising from the exceedance of permitted emission limits to water. Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Schedule 3 Table S3.2 (Point source emissions to water (other than sewer) and land – emission limits and monitoring requirements) 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

(b) Compliance Assessment

Point Source Emissions to Water – W1

Permitted Limit Exceedance – pH

Emissions monitoring data submitted by the operator on 28 April 2026 states that the measured pH result at emission point W1 on 17 February 2026 was 10.7. This is an exceedance of the permitted emission limit and represents non-compliance with condition 3.1.2 of the environmental permit.

Compliance Classification Scheme (CCS): *As a result on this non-compliance with permit condition 3.1.2, a CCS score [C3] has been recorded against compliance sub-criteria IR3A(1) – Emissions & Monitoring – Emissions to Water.*

Justification: *A C3 score has been levied as it is reasonably foreseeable that an exceedance of a permitted emission limit will have a minor impact or effect on the environment.*

Action: *The operator shall undertake measures to prevent the reoccurrence of a pH exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.*

Email sent to operator on 07 May 2026 regarding NRW responses to ongoing breaches of this permit condition (see DMS document: NRW response to CAR action update and deadline extension request.msg).

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

IR3A(2) – Emissions and Monitoring – Emissions to Air

(a) Permit Condition

The purpose of this section is to record environmental permit condition breaches arising from the exceedance of permitted emission limits to air. Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Schedule 3 Table S3.1 (Point source emissions to air – emissions limits and monitoring requirements) is available on pages 12 – 14 of the environmental permit.

(b) Compliance Assessment

Point Source Emissions to Air – A1, A2 and A5

The activities giving rise to emissions from points A1, A2 and A5 were not in operation during the reporting period and generated no emissions to air. Therefore, no air emission limits were exceeded which represents compliance with the environmental permit.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 3.1.2.*

Justification: *NA*

Action: *no action required*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required.

IR4C – Notification

(a) Permit Condition

The purpose of this section is to record environmental permit condition breaches arising from the late notification of any condition breach to NRW. Condition 4.3.2 (b)(i) of the environmental permit states:

*(b) in the event of a breach of any permit condition the operator must immediately
(i) inform Natural Resources Wales*

Furthermore, condition 4.3.3 of the environmental permit states:

Any information provided under condition 4.3.2(a)(i) or 4.3.2(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

(b) Compliance Assessment

The operator notified NRW of the exceedance of the permitted emission limit for pH on 28 April 2026 (document reference: *exceededce [sic] report Q1 2026*). The exceedance of the permitted emission limit was detected on 19 February 2026. The operator failed to immediately notify NRW of the exceedance following detection which represents non-compliance with conditions 4.3.2 (b)(i) and 4.3.3 of the environmental permit.

Compliance Classification Scheme: *As a result of this non-compliance with permit conditions 4.3.2(b)(i) and 4.3.3, a CCS score [C4] has been recorded against sub-criteria IR4C – Information – Notification.*

Justification: *A C4 score has been levied as it is reasonably foreseeable that the failure to immediately notify NRW will not have any impact on the environment.*

Action: *The operator shall ensure that all future schedule 5 Part A (b) notifications are immediately submitted to NRW following the detection of a permitted limit exceedance.*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required

[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.