Compliance Assessment Report CAR_NRW0051828

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: Site Inspection,

Reason: Routine.

On: 03/02/2026 between 10:00 and 12:00.

Parts of permit assessed: 2.3.1, 3.1.2, 3.5 3.7.

NRW Lead Officer: Dale Padfield.

Report sent to: ~, Environmental Manager, on 13/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.5.1(b)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3I - Installations - Emissions and monitoring - Fire	C2 Significant	3.7.1
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR3I - Installations - Emissions and monitoring - Fire	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	39

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
IR3E	Action 1 7Steel Uk 13/05/2026: – Investigate the root cause of the failure / along with detail on why the error, particularly for 'Substation location, went undetected for such a long period. Provide a summary of your findings and details of any measures implemented to prevent a re-occurrence.	10/06/2026
IR3A(1)	Return to compliance.	Already completed
IR3I	Action 2 – 7Steel UK – 13/05/2026: Mitigate the risk of fire associated with the 'steriles' waste stockpile by ensuring that the pile is brought into compliance with the Fire Prevention and Mitigation Plan (FPMP) guidance (Guidance Note 16 – Fire Prevention and Mitigation Guidance – Waste Management, Volume 2). This may include, but is not limited to, relocating, reducing or splitting the stockpile to ensure that maximum pile dimensions, separation distances and accessibility requirements are met. While NRW acknowledges that the stockpile is undergoing phased removal and processing, a significant quantity remains on site and therefore appropriate interim fire prevention and mitigation measures must be implemented and maintained. This should include additional monitoring, such as enhanced visual inspections and, where appropriate, temperature monitoring, for the duration that the stockpile remains present. Provide NRW with written confirmation and supporting evidence (e.g. photographs, updated site plans or monitoring records) once these measures have been implemented.	29/05/2026
IR3I	Action 3 – 7Steel UK – 13/05/2026: Investigate why the accumulation of the 'steriles' waste stockpile did not trigger a review of the FPMP, despite the FPMP containing a specific requirement within the 'Review and Monitoring of the FPMP' section to review the plan following changes to waste quantities or stockpile sizes. Identify the root cause(s) of this failure and implement any necessary procedural changes, management system updates or training requirements to ensure that similar situations are identified and managed appropriately in future. Provide NRW with a written report detailing the findings of this investigation and any measures implemented as a result. Additionally, provide a response to the list of questions detailed in the 'Additional information requested to relation to Action 3'.	31/07/2026
IR3I	Action 4 – 7Steel UK – 13/05/2026: Undertake a full review of the existing FPMP(s) to ensure that they accurately reflect current site operations, including all relevant processes and activities carried out across the minerals site, and that these	30/09/2026

Criteria	Action needed	Complete by
	activities are managed in accordance with the current FPMP guidance. Any discrepancies identified must be addressed, and the FPMP updated accordingly.	

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

7 Steel Manufacturing (UK) Limited

EPR/TP3639BH

This compliance assessment form details the following:

- Quarter 1 (January – March) 2026 permit reporting returns
- Other reporting requirements in relation to CAR_NRW0050713
- Site visit and inspection on the 3rd of February 2026
- Site Visit and inspection on the 22nd of April 2026
- Schedule 5 notifications
- External complaints & reports
- Actions from CAR_NRW0050681

Quarter 1 (January – March) 2026 permit reporting returns

Air emissions ~ A1 / A5 / Ambient monitoring

A1 ~ Maximum daily average particulate emissions for January, February and March were reported at 2.96 mg/m^3, 4.28 mg/m^3,and 2.73 mg/m^3, respectively. All maximum average values are below the ELV. The reports are accepted.

A4 ~ . A maximum value reported as Ringelmann shade 0 during January, February and March. The reports are accepted.

A5 ~ A total of 408.52 hourly averages were recorded during the quarter, with 0 hourly averages exceeding the trigger level. The report is accepted.

Ambient monitoring ~

Baden Powell -TOPAS monitor – Received – Data set complete with no gaps.

Willows School -Oizom monitor - Data set complete with no gaps.

Minerals Site Weigh bridge – TOPAS monitor – Monitor appears to malfunction from the 20/03/26 as results for both PM_{10} and $PM_{2.5}$ drop to what effectively appear to be 'zero' readings'

Minerals Site Substation – TOPAS Monitor- Appears to be providing abnormally low readings for the entire quarterly dataset with the vast majority of readings being <0.

The Minerals site TOPAS monitors are specified in Table S3.4 of the permit, with a monitoring frequency of "continuous." These monitors form a key component of the site's Dust Management Plan, enabling the investigation of increases in ambient dust concentrations, as well as any complaints or incident reports. This monitoring is essential for substantiating potential fugitive dust emissions and identifying specific operations or sources that may be contributing to elevated dust levels.

The unavailability of monitoring data significantly compromises the site's ability to carry out effective investigations. Without reliable data, it becomes difficult to substantiate and quantify fugitive dust events, as well as to identify their source, which in turn hinders appropriate response and mitigation.

The unavailability of continuous TOPAS monitoring data represents a breach of permit condition 3.5.1(b) and reduces the operator's ability to detect, investigate, and substantiate fugitive dust emissions. While no direct environmental impact has been identified, the loss of reliable monitoring compromises management control and increases the risk of undetected emissions. In line with NRW guidance, this is appropriately classified as a Category 3 non-compliance.

Non-compliance – A category 3 non-compliance is issued for failing to continuously monitor the ambient particulate concentrations at the agreed locations on the minerals site, breaching permit condition 3.5.1(b).

Action 1 7Steel Uk 13/05/2026: – Investigate the root cause of the failure / along with detail on why the error, particularly for 'Substation location, went undetected for such a long period. Provide a summary of your findings and details of any measures implemented to prevent a re-occurrence. **Due 10th June 2026.**

Waste returns

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

Schedule 5 Notifications during quarter 1 (January - March) 2026

One Schedule 5 notification was submitted during this quarter, detailing an exceedance of the total suspended solids (TSS) emission limit value (ELV) at the S1 emission point on the 06/03/2026. A TSS value of 29 mg/l was recorded against an ELV 20 mg/l. The part B explained that a lack of coagulant stock had resulted in insufficient dosing and elevated TSS. The lack of stock was explained as difficulties with the ordering and purchasing, with the import of the coagulant impacted by the current global affairs. 7Steel explained that efforts have been made, including holding additional stock to prevent this issue re-occurring, however, some risk still remains and can not be completely removed due to the type of coagulant being used and the location from which it is sourced. As with previous breaches of this nature, although the TSS itself is unlikely to have detrimental environmental impact, the solids generally contain metals which are not abated at the downstream treatment plant but transferred to the sludge and ultimately are released to the environment. A minor category 3 non-compliance will be issued for the exceedance, this is assessed as having a minor impact as the emission is made to sewer and is only marginally above the ELV.

Non-compliance – A category 3 non-compliance is issued for exceeding the total suspended solids ELV to the S1 emission point. Permit condition 3.1.2.

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External complaints & reports

Two separate reports were received by NRW concerning elevated noise emissions alleged to be originating from the Meltshop on the 15/02/2026. 7Steel provided screenshots of the operations at the alleged timings and investigated a ‘noise recording’ submitted by a reporter but were unable to determine any activity occurring on site at the time of the recoding which would have contributed to the noise. No further reports of noise have been received or observed during site inspections. The reports were closed as unsubstantiated.

A single report concerning air quality issues was received by NRW via the local authority. With concerns raised particularly for the 20/03/2026. Several queries were raised into what air quality monitoring takes place and what abatement is used on site. A response was provided to the council explaining the measures and monitoring in place at the facility, along with ambient air monitoring data. 7Steel investigated and reported on site operations for the day in question, no abnormal events or emissions were identified or reported. No further reports were received. The report has been closed as unsubstantiated.

Reporting requirements and updates in relation to CAR_NRW0050713

Several actions were issued in CAR_NRW0050713, two actions (7 & 8) require quarterly updates on tonnages remaining on site and removed in relation to the stockpiled EAF dust. 7Steel have reported that a total of 1764.03 tonnes of stockpiled EAF dust has been removed from the facility over this quarter, comprising of 1219.25 tonnes in the 'Yellow bag Shipments' and 544.78 tonnes as 'bulk dust transport'.

The total estimated quantity of remaining dust was reported as 24,000 tonnes as of the end of April, with a quantity having already been removed during November and December 2025.

7Steel have reported that two contracts are now in place, with an agreed 22,000 tonnes of the stockpiled EAF dust being shipped to Portovesme by June 2028 and 1,500 tonnes being consigned to a UK outlet annually. This should provide for the removal of the entire stockpile.

The temporary capping for the EAF dust pile was observed during inspections in February and April 2026, with the drainage works supporting the capping close to completion. A change in the drainage design was made with an updated design statement provided to NRW for evaluation. This is currently being reviewed by NRW's geotechnical engineer. Once complete, it is expected that 7Steel undertake the required groundwater and soil monitoring.

The requested quarterly updates in relation to the stockpiled EAF dust have been met (actions 7 & 8). The responses to the other actions issued in CAR_NRW0050713 are due at a later date and will be captured in subsequent CAR forms.

Site visit and inspection on the 3rd of February 2026

A site inspection and meeting was held on the 3rd of February 2026. Discussions were held regarding the potential replacement of the 'Haith plant' (listed as activity A12 within the permit) with a new automotive shredder residue (ASR) sorting plant. As discussed, the change would require a permit variation as there will be a change in mechanical plant which will require the associated operating techniques, assessments and management plans to be updated as required. This may be considered a minor technical variation, providing the risk posed by the change is equal or less than any risk posed by the current operation. If there are any additional emission points or expected increases in noise for instance, then the change may need to be undertaken as a 'normal' variation.

A site inspection was undertaken, primarily to assess the waste storage and management at the scrap receiving site, haith plant and shredder plant, and to conduct the first visit of the shredder plant since

it became operational.

The scrap yard was well organised with waste streams clearly segregated. The operator explained that there was additional scrap at the site due to a large quantity of re-bar received form the rod and bar mill requiring re-processing, which was limiting the available space on the site. Surfacing across the facility was in good condition with no evidence of spills.

The shredder yard was exceptionally well maintained and organised. Scrap grades clearly segregated and stored in dedicated areas. The shredder was not operational during the visits as it was undergoing maintenance. Deflagration events were discussed, with the site reporting occasional deflagrations, primarily caused by small quantities of fuel remaining in fuel tanks or unremoved SIR detonation devices poorly depolluted ELVs. Waste acceptance procedures and criteria described along with procedures for failing waste acceptance and efforts undertaken to improve the quality of incoming waste were discussed, including terminating contracts with waste suppliers repeatedly providing poor quality scrap / de-polluted vehicles.

One aspect raising concern during the inspection was the large pile of waste being stored to the rear of the Haith plant. When questioned, 7Steel stated that this waste was the ‘steriles’ a residual waste stream following the removal of ferrous and non-ferrous metals within the Haith plant operation. 7Steel explained that the waste stream still contained a relatively significant proportion of metals which the sorting equipment on the shredder plant was capable of recovering. The quantity of metal remaining, when recovered, would pay for the disposal of the remaining residual waste, as such, provides economic and environmental benefits and would indeed be deemed using BAT to effectively recover waste.

7Steel explained that the pile had accumulated due to the shredder plant fire which occurred in May 2025. The Haith plant steriles are typically run through the AS plant when the AS plant is not shredding. The significant down time caused by the fire resulted in a back log of scrap requiring shredding, this in turn limited available processing time for the Haith plant ‘Steriles’ waste.

This situation resulted in an estimated stockpile of 3,000 tonnes of steriles waste accumulating to the rear of the Haith plant. The composition of the waste was stated as 6% non-ferrous metals and 1.7% ferrous, with the remaining being composed of rubbers, plastics, wood, stones and dirt. Closer inspection revealed a mix of materials, with a significant proportion likely classed at combustible. As such the ‘steriles’ pile would be deemed as posing a fire risk. This is further reinforced by the fact that a percentage of the post treated ‘steriles’ waste is consigned off site as refuse derived fuel (RDF) indicating inherent combustibility. An estimation of the dimensions of the loose pile of waste were made on site and utilising satellite imagery, the following estimates were made - 50 meters in length, 20m in width and 6m in height.

Review of 7Steels current Fire Prevention and Mitigation Procedures (FPMP) has revealed that this waste stream has not been captured. Furthermore, from discussions held on site, it became apparent that no consideration to the potential risk of fire from the current arrangements of the ‘Steriles’ storage have been made. As such, 7Steel have failed to apply the measures listed within the FPMP guidance (Guidance Note 16 – Fire Prevention and Mitigation Guidance – Waste management) which is listed as required operating technique under the able S1.2 of the permit.

An assessment against the NRW FPMP Guidance note 16 highlighted several areas of concern;

- Sack size and volume: NRW Fire Prevention and Mitigation guidance sets maximum stockpile dimensions and volumes to reduce fire risk and allow effective firefighting intervention. Where a stack is only accessible from one side, the guidance specifies that stack widths should be limited to a maximum of 10 metres. In this case, the steriles stockpile significantly exceeds this width and is only accessible from one side. The excessive size and poor accessibility restrict heat dissipation, reduce the ability to detect and intervene early, and increase the likelihood of heat build-up and self-heating. In the event of ignition, the scale of the pile would also increase the likelihood of a deep-seated and prolonged fire, limiting firefighting effectiveness and increasing environmental impact.

- Waste type and composition**:** NRW Fire Prevention and Mitigation guidance (formerly GN16) identifies plastics, rubber, wood, and mixed or contaminated wastes as combustible waste streams requiring assessment and control. These materials were observed within the steriles stockpile during the inspection. The presence of such wastes introduces an inherent fire risk due to their combustible nature and their potential to contribute to rapid fire development and escalation, particularly when stored in large, mixed stockpiles. Where waste composition is mixed and not fully characterised, the guidance adopts a precautionary approach, requiring such material to be managed as combustible waste.

- The steriles waste is derived from heterogeneous scrap materials sourced from multiple origins, resulting in inherent variability in composition. FPMP guidance recognises that mixed and poorly characterised waste streams present increased fire risk, particularly where the presence of residual hydrocarbons or other contaminants cannot be reliably excluded. Such uncertainty can hinder the identification and management of ignition sources and reactive materials, increasing vulnerability to fire initiation and escalation. In the absence of detailed characterisation and defined controls, this uncertainty contributes to an elevated fire risk that must be addressed through appropriate assessment and management measures.

- Storage duration and throughput: The guidance promotes active stock management and minimal storage times. The information gathered would suggest that the practice of storing the ‘steriles’ waste has been ongoing since some time in May 2025, resulting in a proportion of the waste being stored for 12 months. The fire risk of the waste had not been considered, therefore the waste had not been subject to any active management, such as turning to distribute heat or temperature monitoring etc during this period. This increases the probability of self-combustion through progressive heat build-up within the pile.

- Fire spread and separation distances: The guidance requires adequate separation distances between piles and nearby structures / buildings or other wastes to limit the spread of a fire. In this case, the pile is stored directly up against one building and there is insufficient separation between the pile and the Haith plant and the nearby substation / electrical infrastructure buildings (requiring 17 to 36 meters dependant on definitive waste characterisation and pile

length). Additionally the pile is adjacent to the site boundary which has significant vegetation and tree growth, which could provide a pathway for fire spread. These aspects increase the potential escalation in the event of a fire.

- Firewater management: It is unclear what the surface and drainage arrangements are for this area of the site. The application documentation and evaluation suggests the external surfacing is composed of 'hardcore' made from compressed slag wastes. The documentation and correspondence suggests that the storage of this waste type and at this quantity had not been considered, as such the risk of fire was assessed as extremely low for external areas of the Haith plant, with the expectation that a fire would likely occur inside. The correspondence suggest that the firewater would be captured in the drainage and sump system and treated in the internal waste water treatment plant within the Haith plant. As such, the risk of contamination from firewater is a high possibility for the external area in this location given the potential pathway for contaminated firewater to enter the soil and groundwater. There is also the potential for pollution from open stockpile storage allowing the escape of leachable components, however these aspects need further consideration. Furthermore, the original planned internal WWTP was did not go ahead, as such, the FPMP for this area needs further review to ensure it remains relevant and adequate.

- Quarantine area: The 'Scrap Processing Centre Fire Prevention and Mitigation Plan ECP 54 Revision 4' states that there will be a quarantine area large enough to accommodate at least 50% of the largest pile, the annotated map of the site, indicates a location to the East of the site entrance, during the visit, this area was the car parking area for the site office, and would not provide an adequate location for a quarantine area. The 'Shredder and Shear Fire Prevention & Management Plan' also indicates a separate quarantine area, however the maximum tonnage the area was designed to accommodate was1000 tonnes of scrap metal. As such the area would likely accommodate less than a 1000 tonnes of the steriles waste given the differences in density of the wastes. The FPMP guidance requires a quarantine area capable of storing 50% of the largest pile, in this case the steriles waste has grown to be the largest pile and arrangements should have been made to remain compliant with the quarantine requirements.

The stockpiling of the waste 'Steriles' is deemed to be a breach of the Environmental Permit as 7Steel have failed to implement and operate in accordance with an approved FPMP, have failed to store wastes in a manner that minimises the risk of fire and limits fire spread and failed to ensure operation are carried out using appropriate measures to prevent pollution and protect human health and the environment.

The issues identified above demonstrate a failure to adequately manage fire risk in accordance with the requirements of Fire Prevention and Mitigation Plan Guidance Note GN16, as well as a failure to operate in line with the site's own approved FPMP. In particular, the accumulation and prolonged storage of potentially combustible, mixed, and potentially contaminated 'steriles' undermines the effectiveness of the prescribed fire prevention controls.

As stated in previously compliance assessments, NRW assigns a compliance score based on the potential environmental impact, rather than solely on whether actual harm has occurred.

Factors taken into consideration are:

The potential risk – Even in the absence of an actual fire or pollution event, the situation presents a credible and elevated risk, the site has accumulated a large stockpile of waste and failed to manage any fire risks in-line with the relevant guidance and in-line with internal fire prevention and mitigation plans.

Worst-case credible scenario – The assessment considers what could reasonably occur, the waste pile could result in a large uncontrolled fire, leading to large quantities of smoke containing toxic and hazardous substances from the combustion and part-combustion of the mixed waste materials. This could result in poor air quality, with the potential to impact nearby receptors dependant on wind direction and weather conditions. Large volumes of firewater could be generated with limited containment at this particular area of the site, leading to the escape of contaminated firewater runoff and contamination of land and groundwater.

Likelihood and consequence – The absence of effective controls significantly increases the likelihood relative to a compliant operation. While no fire has occurred to date, the likelihood of a fire event has been materially increased through the failure to identify, assess and manage the fire risks associated with the storage of the 'steriles' waste in accordance with the FPMP. The accumulation of a large, mixed and potentially combustible stockpile without defined controls, segregation, monitoring or management represents a significant deterioration from a compliant baseline, where fire prevention measures would normally act to reduce the likelihood of ignition and escalation. In the absence of these measures, the operator cannot demonstrate that the likelihood of a fire is being effectively minimised, and the residual risk therefore remains unacceptably elevated when compared to an operation compliant with FPMP requirements.

The severity of an incident would have a high consequence, there are multiple human and environmental receptors within 500m and 1 km of the site, with both industrial and residential areas including two primary schools and a high school. Environmental receptors include the nearby Severn Estuary and Cardiff flats holding various statutory designations, SSSI, SPA, SAC and RAMSAR.

When assessed against the non-compliance scoring criteria for impact on air quality, a significant impact is defined as:

"An accident or incident at an industrial establishment resulting in the unplanned or uncontrolled release of dangerous substance(s) to air. Quantifiable impact on air quality (which is attributable to the incident) will normally be detectable outside the establishment. Other confirmed impact types may be associated with significant air pollution incidents e.g. human health."

or

"Noticeable and sustained deterioration in air quality from visible sources (dust and particulate fallout) or emission of toxic materials impacting on the locality. Ambient air quality results may show a sustained impact associated with the incident over several hours."

An uncontrolled fire involving the 'steriles' waste stockpile represents a reasonably foreseeable scenario given the absence of effective fire prevention and mitigation measures. Such an event would be expected to result in the release of smoke, particulates and combustion by-products to air, with the potential for off-site impact. The nature of the waste stored, being mixed and containing combustible components, increases the likelihood that emissions would include toxic and hazardous substances, capable of affecting nearby receptors depending on meteorological conditions.

This scenario also presents a reasonably foreseeable risk to human health, consistent with the definition of significant human health impact:

"Likely to cause significant offence to human senses… Significant effects may be noticed by sensitive individuals and action to avoid or reduce these effects may be needed… Asthmatics will find that their 'reliever' inhaler is likely to reverse the effects on the lung."

In line with NRW scoring guidance, the assessment is based on the potential impact rather than the absence of an actual incident. The combination of a large unmanaged stockpile, a lack of FPMP controls, and the proximity of sensitive receptors means that, should a fire occur, the consequences would be significant.

Non-compliance conclusion

As such, the non-compliance is assessed as a Category 2 (Significant) non-compliance, due to the reasonably foreseeable potential for significant impacts on air quality and human health, arising from the failure to manage fire risk in accordance with the approved Fire Prevention and Mitigation Plan.

Non-compliance:
A Category 2 non-compliance is issued against **permit condition 3.7.1**, for failing to manage operations – specifically the storage of the 'steriles' waste stream – in accordance with a written Fire Prevention and Mitigation Plan and the current, relevant FPMP guidance.

Further non-compliance scoring will be issued once the root-cause of this non-compliance is identified.

During the inspection on February 3rd, 7Steel stated that the removal and processing of the waste would take approximately 4 months. During a subsequent visit on the 22nd of April, it was evident some material had been removed from the pile, however an estimated 2,500 tonnes remained, a large pile was also seen in the shredder yard awaiting processing so it is unclear how much waste had been processed and removed from site. This means an estimated 500 tonnes of waste had been processed in the 6 weeks since in the initial visit.

Action 2 – 7Steel UK – 13/05/2026: Mitigate the risk of fire associated with the 'steriles' waste stockpile by ensuring that the pile is brought into compliance with the **Fire** Prevention and Mitigation Plan (FPMP) guidance (Guidance Note 16 – Fire Prevention and Mitigation Guidance – Waste Management, Volume 2). This may include, but is not limited to, relocating, reducing or splitting the stockpile to ensure that maximum pile dimensions, separation distances and accessibility requirements

are met.

While NRW acknowledges that the stockpile is undergoing phased removal and processing, a significant quantity remains on site and therefore appropriate interim fire prevention and mitigation measures must be implemented and maintained. This should include additional monitoring, such as enhanced visual inspections and, where appropriate, temperature monitoring, for the duration that the stockpile remains present.

Provide NRW with written confirmation and supporting evidence (e.g. photographs, updated site plans or monitoring records) once these measures have been implemented. **Due 29/05/2026.**

Action 3 – 7Steel UK – 13/05/2026: Investigate why the accumulation of the 'steriles' waste stockpile did not trigger a review of the FPMP, despite the FPMP containing a specific requirement within the 'Review and Monitoring of the FPMP' section to review the plan following changes to waste quantities or stockpile sizes.

Identify the root cause(s) of this failure and implement any necessary procedural changes, management system updates or training requirements to ensure that similar situations are identified and managed appropriately in future.

Provide NRW with a written report detailing the findings of this investigation and any measures implemented as a result. Additionally, provide a response to the list of questions detailed in the 'Additional information requested to relation to Action 3'. **Due 31/07/2026.**

Action 4 – 7Steel UK – 13/05/2026: Undertake a full review of the existing FPMP(s) to ensure that they accurately reflect current site operations, including all relevant processes and activities carried out across the minerals site, and that these activities are managed in accordance with the current FPMP guidance. Any discrepancies identified must be addressed, and the FPMP updated accordingly. **Due 30/09/2026.**

NRW considers that the accumulation of the steriles stockpile without risk assessment or FPMP review indicates a potential failure of the management system to identify and minimise pollution risk, as required under permit condition 1.1.1(a). Further information is therefore required to understand how risks are identified, escalated and controlled within the management system.

Accumulation of a **large, prolonged, unmanaged stockpile of combustible waste** represents:

- a **change in operating conditions**
- a **departure from the assumed baseline** underpinning the FPMP
- an **increase in pollution risk**

That is precisely the type of change that should be captured by MoC-type controls, even if they are not labelled as such.

This is not just business-as-usual variation. The relevant changes include:

- **Increase in waste quantity and stockpile size**
- **Extended storage duration beyond normal operations**
- **Change in spatial layout and separation distances**
- **Change in fire risk profile compared to FPMP assumptions**
- **Change driven by unplanned events** (post-fire downtime)

Under good practice, *any one* of these should prompt formal review. In combination, they clearly do.

Additional information requested in relation to Action 3: The following questions should be considered when investigating the root cause.

- How does the management system identify and assess new or emerging pollution risks associated with changes in waste quantities, waste types or stockpile sizes?
- What specific mechanism should have identified the accumulation of 'steriles' waste as a new or modified fire risk?
- Why did this mechanism not trigger a review of fire risk controls in this instance?
- How is the FPMP embedded within the wider management system (e.g. procedures, work instructions, compliance checks)?
- What formal checks are in place to ensure the FPMP remains aligned with actual site conditions and operations?
- Who is responsible for confirming that changes on site remain within the scope of the approved FPMP?
- How frequently is the FPMP reviewed under normal operations?
- What events are defined within the management system as triggers for an immediate FPMP review?
- Why did the prolonged accumulation of waste and increasing pile size not meet the internal criteria for review?
- Does the management system define uncontrolled waste accumulation as a non-conformance?
- If so, why was this not raised, logged, or escalated through internal reporting systems?

- What escalation route exists if site conditions drift away from approved operating arrangements?
- What routine inspections or audits are undertaken to confirm waste storage arrangements remain compliant with the FPMP?
- At what level of management are stockpile sizes, risks and compliance performance reviewed?
- Why did management oversight not identify the growing fire risk earlier?

Site Visit and inspection on the 22nd of April 2026

Background

7Steel has accumulated approximately 30,000 tonnes of 'fine' or oily millscale. This fraction of millscale typically contains higher levels of oil and moisture due to the smaller particle size when compared with the coarser fraction. As a result of these characteristics, recovery options for the finer material are more limited. Historically, a primary recovery route was via blast furnaces; however, the ongoing decline of blast furnace operations in the UK has significantly reduced the availability of this outlet.

The stockpiling of this material has been an ongoing issue for some time, leading to the current substantial accumulation of approximately 30,000 tonnes.

7Steel has identified a potential recovery route with an overseas buyer in the Far East, which would require the material to be exported by ship. An initial proposal involved transporting the material to the former Uni-Metals dock facility in Newport; however, this option was no longer viable following the company entering administration. Consequently, 7Steel has been required to explore alternative arrangements.

This has presented a number of logistical challenges. The volume of material is significant and, based on 7Steel's estimates, would require approximately 20 days to transport by road to a dock facility. This duration exceeds typical vessel berthing times, which are generally limited to around five days, making direct loading from site to vessel impractical. Options to temporarily store the material at a suitable dockside facility have been considered; however, to date, no appropriately permitted site capable of accommodating a vessel of the required size has been identified.

A site meeting was held on 22 April 2026, during which 7Steel outlined a proposal to deploy mobile plant at a site on Alexandra Dock. This would enable the material to be treated (e.g. crushing and

screening) and temporarily stored prior to loading onto a vessel. However, this proposal was subsequently reviewed by Waste Policy and Permitting teams, who concluded that a mobile plant permit would not be suitable for the intended activity. 7Steel are now exploring further options.

The accumulation of millscale on site has resulted in 7Steel exceeding the permitted quantities of millscale waste – EWC 10 02 10, which is limited to 6,000 tonnes at anyone time. The non-compliance will be evaluated and scored at a later date.

Actions from CAR_NRW0050681

The Action is copied below for ease of reference.

'Action 1 ~ 7 Steel 13th February 2026: Provide copies of all external reports concerning monitoring undertaken on emissions points A1, A2, A5 and A11. Additionally, provide a copy of the monitoring data from onsite continuous monitors for:

A1 particulate CEM between 01/11/2025 and 30/11/2025 along with a log of the corresponding Meltshop operations (i.e., plant on or off).

A5 particulate CEM between 01/11/2025 and 30/11/2025.'

The information was requested to assess compliance with the monitoring reporting requirements and provide assurance that monitoring data is being reported correctly.

Review: Monitoring results for A1, A2, A5 and A11 quoted within the reports match those reported within the returns. The continuous particulate emissions data was reviewed for November 2026, and agreed with the figure reported on the November 2026 reporting returns. The continuous monitoring data for the A5 CEM also agrees with the data reported, however, the data appears to indicate particularly low results, especially when compared to the A5 monitoring reports. Data handling and evaluation for the A5 CEM data will be assessed in more detail during an operator monitoring assessment (OMA) audit, to be planned for this year. The action is 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 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.