

Natural Resources Wales permitting decisions

Dragon Recycling Solutions Limited (Unit 4 Heads of the Valley Industrial Estate) decision document

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Full permit surrender

The application number is: PAN-019817

The permit number is: EPR/YP3339EC

The surrender number is: EPR/YP3339EC/S002

The Operator is: Dragon Recycling Solutions Limited

The installation is located at: Unit 4 Heads of the Valley Industrial Estate, Rhymney, Tredegar, NP22 5RL

We have decided to accept the surrender of the permit for Unit 4 Heads of the Valley Industrial Estate operated by Dragon Recycling Solutions Limited.

The Operator applied to surrender their permit in full following a major fire at the site and they therefore no longer have the facilities to carry out the permitted activity.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state. We consider in reaching that decision we have taken into account all relevant considerations and legal requirements.

Purpose of this document

This decision document:

- explains how the operator's application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account

The facility

The regulated facility and site

The permit regulated the treatment of components containing mercury from electronic equipment (primarily mercury tilt switches) in order to recover the mercury fraction through the use of a heating, condensing and air filtering process. The permitted activity was Producing, melting or recovering (whether by chemical means or by electrolysis or by the use of heat) cadmium or mercury or any alloy containing more than 0.05 % by weight of either of those metals or both in aggregate. The permit stated this as Section 2.2 Part A(1)(f) and was issued on 11/02/2014, this activity has since changed numbering to Section 2.2 Part A(1)(c) due to changes to Environmental

Permitting Regulations in 2016. There were other activities (namely waste activities) at the site that were not part of this permit.

The activity was permitted as a bespoke low impact installation as met the low impact installation criteria, demonstrating the installation had a low environmental impact. Low impact installations must meet a strict set of criteria including they must have containment measures in place to prevent emissions escaping to surface water, sewer or land and these must be maintained at all times. Annual reports were inspected by NRW to ensure the site continued to meet the low impact installation criteria.

Extent of the surrender application

The Operator has applied to surrender the permit in full. The application was received 07 November 2022 and was duly made as of 30 January 2023. A site condition report was submitted within the application. The surrender is deemed a low risk surrender as does not need to include full intrusive sampling of the land and/or groundwater due to the minimal risk posed by the activity. There is some intrusive sampling included in the application however this was to support investigations following the fire in March 2022, this does not constitute full intrusive monitoring and its presence does not mean the application is a 'normal' surrender.

Pollution risk

Historical pollution history

Prior to the permitted activities the site was used for 'light industrial use' which represents a low risk of historic contamination having taken place at the site. There were no known historic pollution incidents having occurred prior to permit issue. Based on the low risk posed by the historic use of the site, no intrusive investigations were undertaken prior to permit issue.

During lifetime of the permit

The permitted activities involved a number of dangerous substances used and produced at the site:

- Mercury – as liquid metal
- Refrigerant gases
- Vacuum pump oil

No fuels or flammable liquids were stored at the site.

Preventative measures

The site was described as a modern industrial site with an impermeable concrete hardstanding floor/pad. The permitted activities and storage of mercury took place within a self-contained unit which was bunded. There were no drains or watercourses nearby to the activity. Maintenance of the mercury unit and bund were carried out weekly. Therefore, the appropriate preventative measures were in place to prevent mercury contamination of land or water.

Pollution incidents

There has been no pollution incidents apart from recently the major fire that occurred at the site in March 2022. There was no mercury on site during the fire as the mercury operations had stopped a year previous.

Natural Resources Wales incident response attended the fire with South Wales Fire and Rescue Service. It is reported the Operator put in place the appropriate measures to contain any surface water run off and initiated a maintenance plan to ensure any bunds, mats and drain seals remained effective. The Operator sought advice from NRW at all times and kept NRW fully informed during the incident. During the fire, the mercury recovery equipment was reported to have been kept intact as it was kept in a separate metal storage container, although no mercury was on site at the time of the fire. There was a site visit following the fire by the regulatory officer on 31/05/2022, the accompanying compliance assessment report form states there was no evidence of any contamination at the site and the operator was advised to conduct soil sampling of the ground under and near where the mercury unit was located. The soil sampling has been submitted in the surrender application and demonstrates no mercury contamination occurred. The officer inspected the drainage channels and surface water drains which did not show any evidence of contamination.

Following the fire, the site was immediately closed and handed back to the landlord. The landlords insurance company worked with NRW to secure the site and arranged the site closure.

At surrender

The whole site has now been cleared and demolished including the concrete pad has been broken up and disposed of. The demolition and site clearance was conducted by a demolition contractor. All other wastes such as asbestos and other hazardous materials have been disposed of appropriately.

The regulatory compliance officer visited the site when it was near completely cleared and is satisfied that there is no residual contamination or any further ongoing pollution risk to the environment.

The Operator has confirmed all the permitted activities have stopped, the decommissioning of the site and any risk of pollution has been removed and the land is in a satisfactory condition.

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.

Satisfactory state

We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state. In coming to this decision we have had regard to the state of the site before the facility was put into operation.