

Form A

Section	Duly made?	ERA Comments – June 2019
A1.1	✓	Noted
A1.2	✓	Noted
A1.3	✓	Noted
A1.4	✓	Noted
A2.1	✓	Noted
A2.2	✓	N/A
A3.1	✓	Noted
A3.5	✓	Noted

Form C

Section	Duly made?	ERA Comments – June 2019	Comments by WasteServ Malta Ltd. 19.12.2019	ERA Comments – February 2020	Reply by Wasteserv 23.04.2020	ERA Comments – May 2020	Reply by Wasteserv 18.06.2020	ERA Comments – June 2020	Reply by Wasteserv 03.07.2020
C1.1	✓	<p>1. Kindly list the proposed Material Recovery Facility in the section “directly associated activities”.</p> <p>2. The applicant is to confirm that the other directly associated activities covered by permit IP 0005/13/A will be retained.</p> <p>3. With reference to the drawing regarding “Installation of leachate tank” in Annex 04, applicant is to include a reference to this proposed activity and describe the process in all relevant sections and documents of this application include measures to prevent/reduce associated emissions.</p>	These will be included in the consolidated version.	These are still to be addressed in the consolidated version.	Amended.	Noted.	/	/	/
C1.2	✓	Noted	/	/	/	/	/	/	/
C1.3	✓	Noted	/	/	/	/	/	/	/

C1.4.1	✓	With reference to Improvement Program (IP) Item No. 4 of IP 05/13/A, kindly note that a baseline report is still required. As part of this application you are kindly requested to revise the land and groundwater monitoring proposal as detailed in Section C.3.10 below and to include any risks arising from past chemical storage practices as described in ERA's / MEPA's inspection reports. Timeframes by when the baseline report shall be submitted is required.	It is being suggested that land and groundwater monitoring proposal is addressed in parallel to this application (vis-à-vis EMP discussion). This time frame would allow the baseline report to address concerns related to the site in a more holistic manner. 12 months from report approval.	To date the land and groundwater monitoring proposal as detailed in Section C.3.10 below has still not been included in either this application or the parallel discussions on the Environmental Monitoring Programme. Applicant is to immediately submit this proposal (independently or as extracted from an updated EMP) in order to enable consultation with the Statutory Consultees. Suggested timeframe for submission of baseline report from approval of the proposal is being noted.	Refer to Annex 17 of the consolidated application.	Revisions to the proposed land and groundwater investigations included in the EMP as described in Appendix 3 below within this review document are required. It is being suggested that the land and groundwater monitoring proposal is submitted as a distinct document apart from the EMP. Otherwise applicant shall clearly identify which sections of the EMP are addressing this requirement.	Noted. Proposal shall be submitted to the Authority by 26.06.2020. Agreed.	Noted. To be included as part of the consolidated application.	Refer to Annex 31 .
C1.4.2	✓	Noted.	/	/	/	/	/	/	/
C1.4.3	✓	Applicant is to provide a consolidated layout plan showing the location of: a) both the chemical store, the rudimentary MRF and the proposed leachate collection system (plans in Annex 04) with respect to the existing MTP/AD. b) With reference to the latter and section C3.1.2, a drainage plan showing the final discharge plan of the proposed leachate collection gutters shall be submitted. c) The fuel storage tank and associated pipework referred to in Section C2.3 and oil-water interceptors for new workshop are to be indicated on a site layout plan. d) Quarantine area referred to in Annex 13. e) designated storage area for the empty IBCs associated with the anaerobic digestion process.	a) See Attachment 08 . b) See Attachment 08 . From the IBC, the waste liquor is directed to the AD. c) See Attachment 08 . d) See Attachment 08 . e) See Attachment 08 .	Applicant is still to indicate on an updated layout plan the location of fuel storage tank and associated pipework referred to in Section C2.3 of the application.	See Annex 04 Plans .	Engineer's certificate for the diesel refuelling system is being noted. However with reference to the applicant's reply in Annex 05 regarding Improvement Program Item no. 7, applicant is to provide a bund integrity certificate from a third party warranted engineer for the other fuel tank being referred to in the 2017 correspondence dated 17 th February 2017. This is without prejudice to the requirements stipulated as part of the Statutory Consultation (As per Annex III). Each fuel tank is to be clearly identified in this review document as "F1" and "F2" with respect to the submitted Annex 04 – Site Plan. A layout plan showing the route of the fuel pipework for both fuel tanks (as applicable) is still to be provided. Annex 04 – Site plan is to be updated to indicate the location of each combustion plant referred to in Annex 15. The maintenance plan is to be updated to indicate the scheduled replacement of gutters and any other maintenance of the rain water collection system	HGO Tank referred to (previously marked No. 9) shall be decommissioned given it is not in use. In order not to lengthen this renewal and variation process, Wasteserv proposes that any decommissioning plan required is listed as an improvement programme item. To avoid confusion, HGO Tank is now removed from the site plan provided. Site Plan amended. Refer to Annex 04. Fuel Tank marked No. 8 is self-isolated and thus it is not connected to auxiliaries or other equipment. As per above comment, Fuel Tank previously marked No. 9, shall be decommissioned. Site Plan amended. Refer to Annex 04. Maintenance Plan amended. Refer to Annex 08.	Only fuel tank marked as no. 8 located next to the chemical room in Annex 4 shall be permitted for use. Applicant is to provide timeframe by when the decommissioning plan for HGO tank shall be provided. This would be followed by a decommissioning report describing how works would have been actually carried out.	Noted. September 2020.

		These layout plans are to reflect the aspects of all development permits listed in Annex 02 of the main application document which are in place at the time of this renewal and variation application.				referred to in Item No. 14 of Annex 05.			
C2.1	✓	No EMS has been submitted either on the past or on the proposed activities. Applicant is to provide timeframes by when the EMS shall be submitted.	See Attachment 03 .	Noted.	/	/	/	/	/
C2.2.1	✓	Above comment on the proposed leachate collection system refers. This shall include details about the size calculations of such system in order to ensure that it shall not overflow to the surrounding environment and any wastewater treatment measures associated with such system.	The system shall incorporate a level control switch such that waste liquor is pumped into the next stage immediately and thus ensuring that there is no (risk of) overflowing. Daily checks are captured in form SAWTP065 (refer to Attachment 03) to ensure system integrity. The collection vessel shall be an IBC of 1 cubic meter. Calculations are made redundant given the design of the system (level control switch).	Noted. Operator's reply in C3.11 regarding fugitive emissions to air is also being considered.	Noted.	/	/	/	/
C2.2.2	✓	Above comment on the proposed leachate collection system refers.	/	Noted.	/	/	/	/	/
C2.2.3	✓	Above comment on the proposed leachate collection system refers.	/	Noted.	/	/	/	/	/
C2.2.4	x	ERA's feedback on the BAT Comparison is provided in Annex 2 for replies to be provided by the operator in the same document. Where necessary the operator may refer to specific documents within the original IPPC application in order to address certain BAT Conclusions covering all operations on site.	/	/	/	Replies to the queries in Annex 2 are to be included in a revised BAT Comparison document.	Noted.	/	/

C2.2.5	✓	Whilst noting the rudimentary MRF is a temporary measure, alternatives to the proposed leachate collection / treatment system are to be provided.	The additional waste liquor collection and treatment measures indicated in this update should serve to direct the liquor to the AD process, which is the most appropriate treatment.	/	/	Noted.	/	/	/
C2.3	x	Noted. Diesel fuel storage tank is to be covered by the relevant REWS clearance/ notification/ authorisation as applicable. With reference to Annex 16, applicant is to provide the photos referred to in the engineer's report showing how all valves, flanges and pipes associated with the fuel transfer system are leak proof.	Photo and report attached. See Attachment 01 .	Noted.	Annex 16 .	Annex 16 refers to January 2020 as the next inspection date. Kindly provide an updated version of this report while also addressing all queries raised by REWS as part of the Statutory Consultation (refer to Annex III).	Inspection by engineer shall be coordinated and inspection report submitted to ERA. To point out that, following discussions with REWS, fuel dispenser is being phased out and alternative refuelling options have been considered; which options shall be approved by REWS.	Whilst noting that the HGO is being decommissioned as indicated in replies to section C1.4.3 above, kindly confirm that such report endorsed by REWS shall be submitted by September 2020. Otherwise, kindly provide a decommissioning plan of this tank too.	Inspection report by engineer confirming bund integrity and capacity shall be submitted to ERA by not later than July 2020. In the meantime, plans to phase out this dispensing unit remain in place and are in line with recent discussions with REWS. Phasing out planned to be completed by September 2020.
C2.4	✓	Noted.	/	/	/	/	/	/	/
C2.5	✓	As discussed in the SAWTP Environmental Monitoring Committee of 21 st June 2019, applicant is to provide a schedule of works with dates for the rest of year 2019 and 2020 of when each equipment which could potentially generate odours shall be cleaned.	See Attachment 09 .	Noted.	Annex 08 .	Noted.	/	/	/
C2.6	✓	Noted.	/	/	/	/	/	/	/
C2.7	✓	Noted.	/	/	/	/	/	/	/
C2.8	✓	Refer to comments within Annex 2 regarding the Fire safety report and the Occupational & Health Safety Audit. WSM to identify, assess and minimise the environmental risks and hazards of accidents and their consequences due to the proposed leachate collection / treatment system. With reference to the Occupational & Health Safety Audit dated August 2018 and the associated proposal to revise the current ERP by November 2018 (as per item 6.1.13.4), applicant is to submit such a revised plan which considers recent incidents.	Impermeable gutter and bunded IBC. Away from traffic route. Minimal risk. ERP was recently updated. See Attachment 10 .	Noted.	Annex 24 .	Noted.	/	/	/

C2.9	✓	Refer to Annex 2 regarding questions on training in BAT No. 18.	/	/	/	/	/	/	/
C2.10	✓	The outline decommissioning plan is to include reference to the eventual decommissioning of the proposed leachate collection (and treatment) system from the RCVs. Kindly include details provided in the application in the updated decommissioning plan and submit accordingly.	Decommissioning of the proposed waste liquor collection system will essentially consist of the dismantling of the IBC, pipework and associated pumps. This will be incorporated into the full decommissioning plan for the site, as considered in the original Decommissioning Plan attached. Refer to Attachment 07 .	Whilst noting the provided reply, kindly update the outline decommissioning plan in order to mention the equipment that would need to be dismantled.	Annex 19 .	Noted.	/	/	/
C2.11	✓	N/A	/	/	/	/	/	/	/
C3.1.1	✓	With reference to Annex 2, applicant is to provide information on the compositional analysis and EWC code/s for the leachate collected from RCVs. Such an analysis shall assist the waste producer to classify such waste as hazardous or not.	The waste liquor is a derivative of the organic fraction of the biowaste collected. A suitable code would be EWC 20 01 08 - biodegradable canteen and kitchen waste. Given the origin of the waste, hazard analysis is not deemed necessary.	Noted without prejudice to any further comments received from Statutory Consultees.	/	/	/	/	/
C3.1.2	✓	With reference to the proposed leachate collection system (and any treatment) from the RCVs, applicant is to indicate the storage of wastes on a site layout plan and give details on the following; <ul style="list-style-type: none"> Maximum storage capacity; Containment measures (including bunding capacity, where applicable); Protective measures (including security). With reference to the glass crusher referred to in the past improvement program, kindly describe how glass resulting from the processes on site will be stored, handled and disposed of.	See also previous entry C1.4.3. RCVs can unload their waste liquor in the gutter in the Reception Hall. The gutter is linked to a bundled IBC situated in the WET MTP area. The IBC's capacity shall be that of 1 cubic meter. Through the use of a flow switch, waste liquor is continuously diverted to the AD. Waste liquor system functionally to be checked twice daily (refer to form SAWTP065). IBC is away from the traffic route. Glass crusher in mothball condition and is not projected to be used in the foreseeable future. Glass received is stored in the yard where it is handled by wheel shovels. Normally disposed of via authorised brokers or sellers.	Applicant is to provide further details on the handling process that takes place by the wheel shovels. Should crushing take place, this is to be located in contained conditions in order to attenuate noise and dust emissions. Otherwise no crushing of glass will be permitted on site.	The wheel shovel is used to pile the glass delivered by the RCVs to pile up. The glass crushing is not being used.	With reference to BAT No. 18 kindly indicate how noise emissions will be reduced by this activity.	Noise emissions are reduced by adopting the following modus operandi: <ul style="list-style-type: none"> Unloading of glass by Waste Carrier happens only during daytime (till 7pm latest) and not at night. Activity is limited to piling up of glass by Wheel Shovel Operator. In both instances, drop height is minimal. 	Noted. Noise monitoring referred to in C3.10 shall take place during such activity.	Noted.

C3.1.3.	✓	Further to question C.1.1.3, applicant is to provide details on how such collected leachate shall be handled and treated. This shall include any disposal and/or recovery methods and how this shall be carried out in order to avoid or reduce any impact on the environment. This shall include any other permitted facilities for such disposal/recovery of such leachate.	The waste liquor shall be pumped into the AD process.	Noted.	/	/	/	/	/
C3.2	✓	Noted.	/	/	/	/	/	/	/
C3.3.1-3.3.3.	✓	<p>In view that until a Public Sewer Discharge Permit allowing the discharge of trade effluent to sewer is obtained, no such effluent shall be discharged to sewer, applicant is to indicate the EP/IP number of the facilities where such waste is being disposed. With reference to C3.3.3, kindly note that the revised EMP includes a proposal for monitoring of such substances being discharged to sewer. Further to the discussions being carried out with WSC (referred to in Covering Document -3. Technical Details) WSM are to describe how the requirements of LN 139 of 2002 as amended are planned to be addressed.</p> <p>In view that the oil-water interceptor is being proposed to be certified following the completion of the construction of the new workshop, application is to provide timeframes by when this shall be completed and submitted.</p>	<p>Wasteserv has completed a stock take of its waters following a comprehensive analysis of all parameters of interest. With this information in hand, Wasteserv is now close in identifying suitable technologies for the treatment of the waste waters with the aim of investing in required infrastructure. Hence, WSM will be looking into entering a Voluntary Agreement with WSC.</p> <p>Target date completion Q2 2020.</p>	Noted without prejudice to any further comments received during the Statutory Consultation process.	/	<p>Comments from WSC are to be addressed.</p> <p>With reference to the truck washing referred to in Annex 05, applicant is to confirm that no truck washing shall take place on site.</p> <p>Furthermore, applicant is to confirm that apart from domestic sewage, no trade effluent or process waters shall require off-site transfer/disposal. If off-site transfer/disposal is required, applicant is to provide the EP/IP number of the authorised waste management facilities which shall handle such waste.</p>	<p>Noted.</p> <p>Confirmed.</p> <p>Wasteserv is presently compiling a fresh application for a Waste Water Discharge Permit and shall submit it to WSC's attention.</p>	<p>Noted. Use of wheel-wash equipment for waste carriers entering the site will still be required.</p> <p>Requested information about off-site transfer/disposal of trade effluent is still required.</p>	<p>Noted.</p> <p>Excess water shall be disposed of as per conditions in Sewer Discharge Permit.</p>
C3.3.4.	✓	Kindly confirm whether the collected leachate from RCVs would require the use of a cesspit on site.	RCVs will unload in a gutter situated in the Reception Hall.	Noted.	/	/	/	/	/
C3.4	✓	Noted.	/	/	/	/	/	/	/
C3.5	✓	Noted	/	/	/	/	/	/	/
C3.6	✓	Noted	/	/	/	/	/	/	/

C3.7	✓	<p>With reference to the observations in various ERA inspection reports and the current state of the abatement system associated with the proposed location of the proposed variations, applicant is to provide;</p> <p>a) evidence of how the spring at door 8 has been installed or otherwise in order to reduce odour emissions</p> <p>b) submit a certificate from third party warranted engineer or architect indicating that the shed walls within the Reception Hall have been adequately sealed against leakage of water or odour.</p>	<p>a) Door 8 has been equipped with a latch. See Attachment 02.</p> <p>b) Shed walls certification pending reinstatement of reception flooring.</p>	Applicant is to provide time-frames by when such shed walls shall be certified.	Shed wall will be certified by Q3 2020.	Noted.	/	/	/
C3.8	✓	Noted.	/	/	/	/	/	/	/
C3.9	✓	Noted. Kindly refer to comments on noise monitoring in section 3.10 below.	/	/	/	/	/	/	/
C3.10	x	<p>With reference to the submitted EMP dated 18th April 2019 and ERA's review dated 21st May 2018, operator is still to update the land and groundwater monitoring plan to consider the following observations and/or submissions which are still required:</p> <ol style="list-style-type: none"> a site layout plan marking areas with and without hardstanding including the dates when such hardstanding was installed any underground storage tanks and/or cesspits on site –their bunding/imperm eability and the materials/wastes stored inside them. This shall include the old waste reception pit as one of the sampling point 	Land and groundwater monitoring plan shall be submitted as part of the EMP which shall be separate from this application.	Kindly note that a revised EMP addressing the monitoring requirements of the SAWTP has not yet been submitted to ERA as part of this application or separately.	Refer to Annex 17 .	<p>Reference is made to the RTO and CHP2 being described in the EMP as not in operational and to be decommissioned. Kindly provide a method statement showing how such equipment shall be safely decommissioned, dismantled and all resultant waste handled by specified authorised waste management facilities.</p> <p>Further to the meeting held on 15th May 2020, applicant is to confirm which of the two CHPs will be dismantled or retained as part of the application. Should there be any other options being considered in terms of the CHP(s) on site, these shall also be communicated to the Authority together with associated timeframes envisaged for any dismantling/overhaul/replacement. All reference to the respective CHP in the application documentation and in the EMP is to be revised accordingly. Should the CHP intended for</p>	<p>Kindly note that there were erroneous references in the EMP. CHP 1 should read CHP 2 and vice-versa. EMP is being corrected. That said, following recent discussions, it was decided that CHP 1 (previously earmarked for decommissioning) shall be retained but kept offline. Similarly, the RTO is switched off. Wasteserv commits itself to submit a Method Statement for the RTO prior to any decommissioning.</p> <p>Following recent internal discussions, it was decided that both CHPs shall be retained. CHP 1 shall be kept offline.</p> <p>CHP 1 shall be registered as Medium Combustion Plant. Refer to Annex 29 for filled-in form.</p>	<p>Noted. RTO will therefore not be permitted for operations.</p> <p>With reference to the CHP1 which is being registered through this application, kindly note that periodic monitoring will be required as long as the equipment is not completely decommissioned. Kindly clarify whether the CHP1 may still be brought into operation if required.</p> <p>Therefore a waste gas flow rate is to be provided, if necessary through the operation of the plant for the purposes of such measurement only.</p>	<p>/</p> <p>Noted.</p> <p>CHP 1 may be brought into operation if required.</p> <p>CHP 1 Approx. 5,385 kg/hr.</p> <p>CHP 2 Approx. 3,912 kg/hr.</p>

		<p>included in that proposal.</p> <p>3. A qualitative assessment with photos on the risk for any land and groundwater contamination resulting from the activities occurring within the pit is to be submitted to the Authority by an independent warranted civil engineer / engineer.;</p> <p>4. the tanks/reservoirs used for storage of the process water and the 2nd class water (including bund capacity and impermeability);</p> <p>5. the tanks used for fuel storage on site (including their storage capacity and bunding),</p> <p>6. the compost storage area and any other external waste storage areas.</p> <p>The above risks should be considered in a proposal with the location of onsite sampling points for the purposes of a baseline report.</p> <p>With reference to the proposed off-site soil monitoring, applicant is to include that further sampling may be required if contaminants are found at depths up to 0.4m.</p> <p>With reference to our comments in C3.6 above and table 7 of this EMP, applicant is to clarify whether PS4 refers to a common stack of both</p>				<p>dismantling still be put into operation, and if this is the CHP falling within scope of the Medium Combustion Plant Regulations (S.L. 549.122), registration is to be submitted as per attached form.</p> <p>Regarding the land and groundwater monitoring proposal, kindly refer to Appendix 3.</p> <p>Whilst noting the proposed analysis on the compost like material, applicant is to confirm that this material is no longer considered as a product under this application and that a separate IPPC variation application and End-of-Waste application would be submitted if applicants intends to handle such material as a product instead of waste during the lifetime of the permit.</p>	<p>Noted.</p> <p>Confirmed.</p>		
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		<p>CHPs or to any of such CHPs.</p> <p>The monitoring plan shall include a proposal for monitoring of each Medium Combustion Plant including any emergency generators with a rated thermal input of 1MW_{th} or greater.</p> <p><u>Air monitoring</u></p> <p>The following revisions are still required:</p> <ol style="list-style-type: none">1. Submission of the ISO 17025:2005 accredited laboratory certificate showing the standards for which the lab is accredited is to be provided to ERA as part of the revised monitoring proposal.2. As per the submitted BAT comparison document in Annex 6, dust is to be monitored from PS2 utilising the EN 13284-1 standard or else demonstrate how the proposed standard is equivalent. <p><u>Noise monitoring:</u></p> <p>Operator to note the renewal and varied IPPC permit shall be revised to conform with the assessment of BS 4142:2014 i.e. does not exceed the recommended level of marginal significance (Noise levels during operations do not exceed the baseline noise levels by more than 5dB)</p> <ol style="list-style-type: none">1. During night time the measurements should be taken for a period of							
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		<p>15min and not 10min as stated in the BS 4142:2014</p> <p>2. The noise monitoring proposal needs to conform with the attached revised “The accreditation requirements for the assessment and monitoring of the noise levels”</p> <p>3. “Noise monitors shall be placed in the designated monitoring stations”</p> <p>Consultants are to provide more information on location and description of the monitoring stations.</p> <p>4. To ensure that monitoring is carried out during representative operational times and background noise measurements are to be carried out when installation is not operating.</p> <p><u>Compost</u></p> <p>1. A number of standard methods listed are withdrawn, kindly provide valid standards or equivalent.</p> <p>2. Operator is still to provide information related to the leachability tests to be carried out in accordance with Council Decision 2003/31/EC.</p> <p>3. If the waste in question is to be used for landscaping or for agricultural purposes, kindly note that the output from such process is to reach end-of-waste (EoW) status. To do this, ERA suggests</p>							
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		you liaise with the relevant competent authorities, in particular the Malta Competition and Consumer Affairs Authority (MCCAA) and the Agriculture Directorate for any standards, legislation and/or technical requirements which such compost or digestate (and its use) would need to adhere to. Please note that following consultation with such entities further testing may be required. In addition, once clearance is obtained from the said entities, the relevant EoW application shall be submitted to ERA for assessment and eventual approval.							
C3.11	x	Kindly submit a mass flow diagram summarising the emissions from the proposed leachate collection / treatment system.	See Attachment 11 . Emissions from the liquor collection system (which is situated in the Reception Hall) are expected to be minimal given that the gutters are laid to falls and therefore residence time (of the waste liquor) in the gutter and channel is minimal. Thereafter, the waste liquor is diverted to the AD which processes are internal process in the tank/s. This implies that the potential for odour potential is very limited.	Noted.	See Annex 09 .	With reference to replies to BAT no 14 in the BAT review document, applicant is to remove reference to MSW (Black bag) from the SAWTP Mass Flow diagram and Annex 17. With reference to feedback from the Statutory consultees, as part of this IPPC application, applicant is to provide an updated version of Figure 25 in the EMP (Annex 17) to indicate the masses (or percentages) of each reject indicated in blue.	Diagram updated. Refer to attachment 'Mass Flow Diagram & Emissions Inventory 18.06.2020' in Annex 17. Figure shall be amended and included in new revision of the EMP.	Noted. Revised mass flow diagram is to be submitted accordingly in reply to this section of the IPPC Application Form C as part of the Consolidated Application through the revised EMP.	/ Noted.
C4.1	✓	Noted, however kindly provide further information on the proposed leachate collection/treatment system as requested above.	/	/	/	/	/	/	/
C4.2	✓	Noted, however kindly provide further information on the proposed leachate collection/treatment system as requested above.	/	/	/	/	/	/	/

C5.1	✓	Noted, subject to any feedback received from the Regulatory Consultees.	/	/	/	/	/	/	/
C6.1	✓	Noted.	/	/	/	/	/	/	/
C6.2	✓	Noted.	/	/	/	/	/	/	/
C6.3	✓	Noted.	/	/	/	/	/	/	/
C7.1	✓	Noted, subject to any feedback received from the Regulatory Consultees.	/	/	/	/	/	/	/
C8.1	✓	Noted	/	/	/	/	/	/	/
C8.2	✓	Noted	/	/	/	/	/	/	/
C9.1	✓	Kindly allocate an estimated budget to cover the upcoming monitoring (as per the EMP), the proposed operational changes (i.e. the new chemical room, rudimentary MRF and the proposed leachate collection / treatment system) as well as cleaning associated with the above activities.	Estimated budget as per below: - Monitoring → € 90,000 pa. - Chemical Room → € 50,000. - Rudimentary Line → € 375,000. - Liquor Collection System → € 160,000.	Applicant still to provide an estimation of the costs incurred by cleaning associated with the mentioned activities.	Cleaning will be done inhouse as covered by ongoing payroll.	Utilising the ongoing payroll or otherwise, applicant is still to provide an estimation of the costs incurred by cleaning of the new chemical room, rudimentary MRF and the proposed leachate collection / treatment system.	Cleaning cost → € 55,000.	Noted.	/

Appendix 3

ERA feedback on the land and groundwater monitoring proposal dated 15.18.19 submitted as part of Annex 17 in response to question C1.4.1 of the IPPC Application Form C:

Without prejudice and further to any related feedback being provided in the Statutory Consultation document, the land and groundwater monitoring proposal is to be revised to consider the following:

- Figure 1 is to clearly distinguish between areas of hardstanding and those without, indicating when such hardstanding was installed.
- Figure 1 is to also include locations of Tank 1, Reservoirs 2 & 3.
- Tables 6 & 7 to be updated to include georeferenced coordinates (UTM WGS84) for each location.
- Locations of core samples are to be confirmed with the Authority on-site prior to initiation of works.
- On/Offsite Monitoring - Water: a signed agreement with bore hole owners allowing for sampling of groundwater is to be provided.
- On/Offsite Monitoring - Water: Analytical suite for groundwater monitoring is to be the same that for land contamination analysis, using appropriate analytical methodology. Parameters listed in table 5 are still to be included in groundwater monitoring regime.
- Pg 29 Onsite Land monitoring: Figure 28 is to be updated to show the exact position of each of the proposed sampling locations. The figure is to also be updated to include major features of the site (ex. tanks, reservoirs etc.). Georeferenced coordinates (UTM WGS84) for each location is to be included.
- Land sampling locations are to be added/moved as required to target the following locations:
 - Within the compost shed
 - Ferric chloride tank
 - Rudimentary line
 - Liquor collection system
- Samples are to be stored in appropriate sealed containers. Sample container material is to be specified in relation to the targeted analytical suite for a given sample.
- All collected samples are to be maintained at 4°C - 8°C at all times up to delivery to the analyzing lab.
- Drilling logs and photographs are to be taken of each collected core in its entirety. These are to be provided to ERA.
- LoDs for each of the parameters listed in Tables 2,3 &5 are to be provided.
- Table 3:
 - Consideration for the inclusion of analysis of the below compounds is required:
 - Total organic carbon (TOC)
 - Cyanide
 - MTBE
 - Phenanthrene
 - Fluoranthene
 - PCBs
 - chlorinated aliphatic hydrocarbons
 - halogenated aliphatic hydrocarbons
 - asbestos
 - Metals – proposed analytical methods are suited for leachate testing not compositional analysis as would be required for baseline purposes. EMP to be updated to include standard methodology to be used for composition analysis.
- Given the known history of a major fire incident on site, analysis of dioxins & furans is to be included in the analytical suite for both on/off-site land and groundwater monitoring regiments.

- 15. The accreditation scope and certificate of the analysing lab are to be provided.
- 16. Whilst noting that when required analysis would be carried out at an accredited lab, applicant is still to indicate for which of the individually listed analytical methods the lab would be accredited to.

Requested revisions are to be done as part of the consolidated IPPC application by:

- a) updating and submitting the EMP as part of the consolidated IPPC application whereby the sections related to land and groundwater monitoring are clearly indicated OR
- b) through the submission of a separate document