

ERA's comments to WSM's BAT comparison	WSM's replies to ERA comments 19.12.2019	ERA comments – February 2020	WSM's reply 23.04.2020	ERA comments – May 2020	WSM's reply 18.06.2020	ERA comments – June 2020	WSM's reply 03.07.2020
<p><u>BAT No. 1</u> – With reference to C2.1, applicant is to provide any policy, report, objectives and targets of the EMS which is currently being implemented according to what is being described in BAT No. 1. With reference to No. 1 (x)(ii), applicant is to apply such a system to any waste waters including leachate generated on site.</p>	See Attachment 03 .	Noted.	<p>Annex 23</p> <p>'SAWTP QP08 SAWTP Waste Enquiry Procedure' document is not signed by WS officials. Signed copy should be forwarded to ERA.</p> <p>With reference to Improvement Program Item No. 3 in Annex 05, applicant is to provide the standard operating procedures indicating actions to be taken in case of failure or breakdown of the abatement systems.</p>	<p>Kindly describe (including submission of relevant documentation) the latest objectives and targets featured in this EMS.</p> <p>Signed SAWTP QP08 SAWTP Waste Enquiry Procedure included in Annex 23.</p> <p>The referred actions are included in procedures SAWTP QP01 Storage of Untreated Waste and SAWTP QP03 Recyclable Waste Processing Procedure. Both procedures are circulating for signatures.</p>	<p>Objectives included in Annex 23.</p> <p>Signed SAWTP QP08 SAWTP Waste Enquiry Procedure included in Annex 23.</p> <p>The referred actions are included in procedures SAWTP QP01 Storage of Untreated Waste and SAWTP QP03 Recyclable Waste Processing Procedure. Both procedures are circulating for signatures.</p>	<p>Applicant is to provide temporary additional measures designed to attenuate odour emissions from the reception hall until such time that Objective 4.2 "Install shutter doors on all major facility openings." is closed.</p> <p>Noted.</p> <p>Both procedures seem to indicate that in case of failure or breakdown of the abatement systems, action shall be taken by the Head of Shift or Supervisor. Applicant is to provide an outline of such contingency actions designated to minimise as much as possible emissions from waste.</p>	<p>Reception Hall is already equipped with the existing and functional shutter door. This objective was set to cater for the new apertures installed as part of the OPP project. All shutter doors shall be in place by September 2020. The following are the measures taken to attenuate odour:</p> <ul style="list-style-type: none"> • Past damaged Reception Hall walls were fixed as part of OPP upgrade. • Reception hall flooring has been reinstated to collect and channel waste liquor to the AD process. • The flooring is designed laid to falls toward the gutter, thus avoiding pooling of waste liquor. • Waste is scheduled to be processed on the same day it is deposited in the plant. <p>Procedures shall be amended to include the following routine:</p> <ul style="list-style-type: none"> - Fault finding investigation. - Mobilisation to repair impaired equipment. - In case of envisaged lengthy maintenance intervention, direct waste to other Wasteserv's facilities. - Resume normal operation when repairs have been concluded.
<p><u>BAT No. 2</u> –</p> <p>(a) and (b): Operator is to provide waste pre-/acceptance procedures including information on any sampling and characterisation that may be required in order to ensure the quality of the incoming waste.</p> <p>(d) Whilst noting the material flow analysis of the MRF in Annex 09, a similar analysis is required for the MTP/AD.</p> <p>(e) Operator is to indicate how different waste streams that are treated within the MTP/AD are kept separate in order to ensure the quality of the output by considering relevant factors such as the organic fraction of such waste and the intended destination (e.g. type of disposal / recovery operation). This shall include time-frames for implementation of such separation measures or necessary upgrading of associated equipment.</p>	<p>(a) and (b) Refer to ADM WA01 and SAWTP QP08.</p> <p>(d) See Attachment 05.</p> <p>(e) The MTP/AD plant currently treats black bag MSW and biodegradable waste. The intention is to divert black bag waste to Malta North over time, as the biowaste fraction is scaled up. The functioning of the AD plant will be enhanced by improved reception and treatment processes that will be the subject of a separate variation. This will also improve segregation, improving the quality of the output wastes.</p>	<p>(e) Applicant is to indicate the proposed Disposal/Recover (D/R code) according to Schedule 8 of The Waste Regulations S.L. 549.63 for each output waste stream originating from the MRF and the MTP/AD activities.</p>	<p>PET Colour – R3</p> <p>PET Clear – R3</p> <p>HDPE – R3</p> <p>Cardboard – R3</p> <p>Paper – R3</p> <p>Ferrous – R3</p> <p>Non-Ferrous – R4</p> <p>RDF – D1*</p> <p>Compost like material - D1</p> <p>Rejects from mills and sedimentation tanks - D1</p> <p>*At present D1, but in the future it is expected that RDF shall be directed to local Waste to Energy Plant for recovery (potential R1).</p>	Noted.	/	/	/

BAT No. 3 – Pending update to EMS to include the proposed leachate collection system as waste waters. Applicant is to provide time-frames by when the existing EMS shall be updated to address requirements of BAT No. 3. Whilst compiling such inventory, the applicant may make use of any relevant past monitoring data.	<p>Procedure SAWTP EP01 Environmental Monitoring calls out the EMP. The EMP in turn dictates which media to monitor, the frequency, etc.</p> <p>The waste liquor shall be pumped into the AD process; the rest of the process is as per norm.</p>	<p>Kindly note that as described in section C3.10 of the Review document, a revised EMP addressing these aspects has not yet been submitted.</p> <p>An inventory is to be provided in this BAT assessment in order to inform decisions regarding monitoring. BAT No. 6 below refers.</p>	See Annex 17 .	<p>Applicant is to provide the following information in relation to the required inventory:</p> <p>i) information about the characteristics of the waste water streams,</p> <p>ii) information about the characteristics of the waste gas stream.</p> <p>In this regard, applicant may consider the submission of past monitoring data which addressed these requirements of BAT 3.</p>	Refer to Annex 17 for details.	Information about the waste gas stream from the rudimentary MRF line is still be provided.	Given that the Rudimentary Sorting Line has not yet been operational, this data is not available.
<p><u>BAT No. 4</u></p> <p>(a) Applicant is to indicate whether the proposed 25 tonne buffer (proposed to be covered) storage area shall be at a location separated to the area marked in green in the second drawing within Annex 04, or whether this “buffer” refers to the actual “grey bag storage area” marked in green.</p> <p>(b) Applicant is to describe how the quantity of waste stored shall be regularly monitored against the maximum allowed storage capacity and provide the actual maximum storage capacity of grey bags including the buffer;</p> <p>(c) In view of the past incidents and the locations of the rudimentary MRF line and leachate collection systems being proposed within the MTP shed, applicant shall indicate how such storage practice shall be rendered safe by ensuring that the equipment used for loading, unloading and storing waste is clearly documented and labelled;</p>	<p>a) The 25t buffer is separate from the highlighted green area.</p> <p>b) Canopy storage = ~200t ; Buffer storage = ~25t. Quantity of waste (which in this case is the grey bag in) is visually monitored. See Attachment 12.</p> <p>c) The 25t amount is the processing capacity. This shall be temporary stored in the reception only during the day whilst in operation. No waste shall be stored in the reception during inactivity. Large storage is in the yard. Incoming and outgoing materials are segregated / physically stored away from the plant.</p>	<p>No information regarding documentation and labelling has been provided.</p> <p>With reference to c) kindly provide the time period on which the 25t processing capacity is being calculated (e.g. per day/week etc).</p>	See Annex 20 .	Noted.	/	/	/
<p><u>BAT No. 5 –</u></p> <p>Applicant is to provide time-frames by when the existing EMS shall be updated to address requirements of this BAT conclusion and indicate the source and final disposal of the mentioned waste water. Any such waste water may require further monitoring as per applicable BAT conclusions.</p>	The source of waste liquor is the organic bag being deposited at Sant’ Antnin by RCVs. The waste liquor shall be diverted to the AD. Waste Liquor System’s functionality shall be checked for functionality via form SAWTP 065. This is included in the EMS.	Noted.	/	/	/	/	/
<p><u>BAT No. 6 –</u> WSM to identify the different waste water streams, their final discharge point and specify where proposed sampling shall be taken from.</p> <p>Waste water which is not discharged to water and therefore no changes need to be made to the EMP since there are no permitted discharges to the environment.</p>	<p>See Attachment 11.</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>	Noted. This exercise needs to be considered for the inventory required by BAT No. 3 above.	/	In accordance with this BAT and considering the possibility of surface run-off contamination, BOD for the rainwater reservoir shall also be measured at key location along the relevant drainage route. EMP is to be updated accordingly.	Rainwater channelled to the rainwater reservoir does not get in contact with asphalted surfaces or terrain. Surface run-off is directed to the excess / process water reservoir.	Noted.	/

BAT No. 7 – WSM to clarify when EMP shall be updated to include the applicable parameters in this BAT conclusion.	Requirements shall be incorporated in the EMP.	Operator still to indicate when the EMP shall be updated accordingly. No updates have been received following last IPPC review.	See Annex 17 .	EMP is to be updated to consider other pollutants (e.g. COD, Hg, PFOA, PFOS, TOC etc.) indicated by WSM as relevant in the BAT comparison document submitted as part of this application. If these are no longer considered relevant, justification is to be provided through evidence submitted as part of the replies to BAT 3 above.	EMP is being updated and shall be submitted to ERA by 26.06.2020.	Noted to be included in consolidated application.	Refer to Annex 17 .
BAT No. 8 – WSM to monitor dust using EN 13284-1 or equivalent in line with this BAT conclusion and thus included in the revised EMP.	Noted.	EMP is to be revised accordingly.	See Annex 17 .	<p>With reference to the HEPA filter for the RDF line, kindly indicate how the operational effectiveness of these filters shall be monitored by means of a pressure differential recorder or equally effective means that can easily and immediately identify any out of range incidents prompting the required actions.</p> <p>A maintenance and replacement plan of such filters is also to be provided.</p> <p>In view that monitoring of the flare emissions is not currently technically possible as per page 31 of Annex 17, applicant is to describe how utilising measured data of the quantity of gas flared, estimates of relevant pollutant concentrations can be calculated.</p> <p>Considering BAT 34, the applicable BAT-AEL range for dust is 2-5 mg/Nm³. EMP is to be revised with an appropriate emission limit level within this range or stricter depending on the optimised performance of the proposed technology.</p>	<p>HEPA Filters are installed on Rudimentary Sorting Line. As per maintenance schedule (Controlled Document 305), every 341 hours (that is approximately every month of operation), the HEPA filters are uninstalled, inspected, cleaned and re-installed. Filters effectiveness is monitored on a daily basis through the current reading. The latter is captured in form SAWTP023.</p> <p>Refer to Annex 26.</p> <p>Noted. EMP is being updated and shall be submitted to ERA by 26.06.2020.</p>	<p>Noted.</p> <p>Kindly provide the source for the flare efficiency provided in Annex 26.</p> <p>Noted to be included in the consolidated application.</p>	<p>/</p> <p>Flare efficiency quoted from literature. Refer to Annex 26.</p> <p>Refer to Annex 17.</p>
BAT No. 12 – Applicant is to provide an odour management plan according to this BAT conclusion.	Wasteserv at present does not have an OMP, though such a function is handled in part through the complaint response procedures and monitoring programmes. It is being suggested that OMP is included as an item in the Improvement Programme.	Applicant is to provide timeframes by when the OMP shall be developed.	See Annex 21 .	Noted.	/	/	/
<p>BAT No. 13 – (a) Applicant is to clarify how WSM controls the just in time process for input waste to reduce odours and confirm that with reference to Section B3.6 of the original IPPC application all waste to be treated in the MTP-AD will be treated within one day from site acceptance.</p> <p>(b) With reference to the ferric chloride observed on site, kindly include any chemicals utilised to destroy or to</p>	(a) Wheel shovel to input waste as soon as practical, with the objective of treating all waste delivered on the same date as delivery. This is constrained by the reality that collection of waste by RCV is not scheduled so it is impossible to have full control (vis-à-vis quantity and arrival time) over the input.	Noted.	See Annex 21 .	Noted.	/	/	/

reduce the formation of odorous compounds (e.g. to oxidise or to precipitate hydrogen sulphide) and provide details of the process involved.	(b) Ferric chloride is not used to mitigate odour but rather to reduce H2S from the gas. Chemicals used in atomisers are show in Attachment 13 .						
<p>BAT No. 14 – (a) Kindly provide timeframes for implementation of temporary containment structures and confirm that no waste with the potential to generate dust, organic compounds and odour emissions such as organic waste and mixed municipal waste (“black bags”) shall be stored outside.</p> <p>(d) (iii) With reference to BAT No. 25 below WSM to clarify how emissions from the MTP process shall collected and directed to an appropriate abatement system (see Section 6.1 of the BAT Conclusions) via an air extraction system and/or air suction systems close to the emission sources. Any such abatement equipment is to be indicated on a layout plan as per Section C1.4.3 of the IPPC application form.</p> <p>(e) WSM to clarify how the following requirement is addressed as applicable;</p> <ul style="list-style-type: none"> - dampening with either water or fog <p>(f) In view of a number of issues of odour emissions from the MTP which is often left open due to a broken shutter etc., WSM to include the fast-action doors within the maintenance.</p>	<p>a) Timeframe for implementation: Q3 2021.</p> <p>d) Refer to replies in BATs 25 and 34.</p> <p>e) This is an error that will be corrected in the consolidated application</p> <p>f) Noted.</p>	<p>a) Timeframe noted. Kindly confirm that no waste with the potential to generate dust, organic compounds and odour emissions such as organic waste and mixed municipal waste (“black bags”) shall be stored outside. Otherwise, kindly provide appropriate interim mitigation measures that can be installed in the short-term.</p> <p>d) Noted</p> <p>e) Noted</p> <p>f) Applicant is to provide an updated maintenance plan to include the fast-action doors.</p>	<p>No black bag will be received at SAWTP and the organic waste will be stored inside.</p> <p>See Annex 08.</p>	<p>Noted.</p> <p>With reference to Annex 05 of this application, applicant is to provide an elevation plan be able to assess the proposed works concerning the sealing of shed walls against water and odour.</p>	/	/	/
<p><u>BAT No. 15 –</u></p> <p>Applicant is to provide specific reference within the original IPPC application showing how the emergency flaring system includes:</p> <ul style="list-style-type: none"> a) the provision of a gas recovery system with sufficient capacity and the use of high-integrity relief valves. b) balancing the gas system and using advanced process control. <p>If any such measures are not yet in place, applicant is to indicate timeframes by when they shall be implemented.</p>	See Attachment 14 .	<p>Attachment 14 does not describe gas recovery systems and use of high-integrity relief valve. Furthermore, it does not indicate how the gas system is balanced or describe the use of advanced process control. Further details on these requirements is available in Section 2.3.5.5 of the Waste Treatment Industry BREF, 2018.</p> <p>If any such measures are not yet in place, applicant is to indicate timeframes by when they shall be implemented.</p>	<p>The gas storage (gas accumulator) has an automatic measuring device connected to Programable Logic Controller (PLC) which, once a setpoint is reached, an automatic signal is sent to open the biogas valves and switch on the CHP(s) - hence utilise the biogas. If for any reason the biogas within the storage is still increasing and reaching the PLC’s max max set parameter level, the gas valve leading to the flaring system is automatically opened and the flare is switched on.</p>	Noted.	/	/	/
<p><u>BAT No. 17 –</u></p> <p>Applicant is to provide timeframes by when the existing EMS shall be updated to address requirements of this BAT conclusion.</p>	<p>No noise & vibrations complaints were registered for Sant’ Antnin in recent years.</p> <p>Wasteserv’s EMS setup is such that the monitoring procedure calls out the EMP. Therefore, any noise and vibration monitoring requirements are to be captured there-in. And in</p>	<p>Noted without prejudice to any further feedback received through the Statutory Consultation process. Kindly note that EMP has not yet been approved and is pending further amendments to the noise section as communicated to operator separately in June 2019.</p>	<p>New EMP includes noise and vibration. See Annex 17.</p>	<p>Noted. Kindly refer to feedback from Statutory Consultees.</p>	/	/	/

	fact, these are captured in page 23 (of the EMP).						
<p><u>BAT No. 18 –</u></p> <p>(b) (iii) WSM to clarify how training is carried out to ensure that staff operates in line with the noise abatement measures.</p> <p>(b) (v) WSM to specify provisions for noise control during maintenance, traffic, handling and treatment activities.</p>	<p>No noise & vibrations complaints were registered for Sant’ Antnin in recent years.</p> <p>(b) (iii) Maintenance team are instructed to carried out a site walkabout to identify faulty parts emitting abnormal noise and vibration.</p> <p>(b) (v)</p> <ul style="list-style-type: none"> - The plant and machinery are mainly located within the shed / enclosure hence noise is inherently controlled. - RCV traffic ceases completely after operational hours. - Unless there is an emergency, maintenance works are not carried out; only cleaning works are carried out during non-operational hours hence noise is controlled. 	Noted.	/	With reference to the handling of glass by the wheel shovel referred to in section C3.1.2 of this IPPC application kindly confirm that such activity will take place within an enclosed building or otherwise indicate how noise emissions will be reduced in accordance with this BAT Conclusion.	<p>Storage and handling of glass shall take place outside in the yard. Noise emissions are reduced by adopting the following <i>modus operandi</i>:</p> <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. These activities are to be taken into consideration when carrying out the noise monitoring survey.	Noted.
<p><u>BAT No. 19 –</u></p> <p>(g) WSM to clarify how adequate collection of leachate is carried out in the MTP following temporary storage prior to sorting. This shall also make reference to the new gutter system that is proposed for the collection of leachate from the RCVs.</p> <p>(i) WSM to elaborate how the installation is designed with a buffer capacity for water and waste water storage.</p>	<p>Following unloading of waste in the reception area, RCVs can unload the waste liquor in the gutter (also situated in the Reception Hall). Flooring and gutter shall be impermeable. The gutter shall be linked to a bunded 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 checked daily for functionality twice a day (refer to form SAWTP065).</p>	Noted.	/	/	/	/	/
<p><u>BAT No. 20 –</u></p> <p>WSM to provide timeframes and interim measures to handle, store and treat the waste water generated on site as identified in BAT No. 3.</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>	Noted. Inventory required by BAT No. 3 is to be updated considering the results of this stock take exercise.	Noted.	With reference to the requested revised inventory in BAT 3 above, AOXs, metals and metalloids, applicant is to include monitoring of all relevant substance in wastewater and suggest an a emission level which apart from the requirements of WSC is also within the range (or stricter) of the applicable BAT-AELs.	EMP is being updated and shall be submitted to ERA by 26.06.2020.	Noted for inclusion as part of the consolidated application.	Refer to Annex 17 .

<p><u>BAT No. 21 –</u></p> <p>WSM to clarify whether the fire safety reports submitted in Annex 11 has been submitted to the CPD and whether the recommendations made by Ing Fabio Stivala and Ing Claude Farrugia (specifically item 6.1.13 Fire safety and explosion management and prevention and section 6 of the Occupational & Health Safety Audit) have been addressed and if not, provide revised timeframes by when they shall be.</p>	<p>Fire safety reports were not submitted to CPD but the ERP was submitted.</p> <p>Recommendations by Ing. Claude Farrugia are being implemented gradually. On 12.08.2019, Ing. Claude Farrugia held another site visit to assess the effectiveness of the measures introduced by Wasteserv. The recommendations by Ing. Fabio Stivala require a major investment and are still works in progress. Status update is given in Attachment 10.</p>	<p>Noted without prejudice to any further feedback received through the Statutory Consultation process.</p>	/	/	/	/	/
<p><u>BAT No. 23 –</u></p> <p>(a & b) WSM to submit such energy efficiency targets / plans as part of the AER, however these were not submitted in the latest report.</p>	<p>At present, no energy efficiency targets were (yet) set at Sant’ Antnin. In the AERs, Wasteserv reports the total annual energy consumption and energy consumption per unit product. Consumption is being reviewed in the light of planned changes and the eventual site decommissioning.</p>	<p>An energy efficiency plan as described in BAT No. 23 (a) is still required for the operations covered by the application for permit renewal and variation.</p>	<p>All motors are connected to inverters to regulate and minimise electrical needs. Moreover, the outdoor lighting is connected to automatic timers to reduce any wastage.</p> <p>Also, the upgrades related to the conversion of the MTP to an OPP will reduce energy consumption by circa 50% and will make the holistic process more efficient – particularly at the AD stage – thus the energy required per unit of waste treated will also be decreased.</p> <p>Since the SAWTP will be decommissioned in the coming years, any further energy efficient measures are not planned.</p>	<p>Noted.</p>	/	/	/
<p><u>BAT No. 25 –</u></p> <p>Operator is to provide details of how contaminated filter media from the wet scrubber and fabric filter washing are handled, stored and disposed of. Such waste water shall be considered in the replies in BAT No. 3 and any associated effluent monitoring requirements. Applicant is to indicate the location of such abatement equipment on a layout plan as per section C1.4.3 of the IPPC application.</p> <p>Furthermore, considering the above abatement, applicant is to indicate the expected emission concentration level of dust that shall be achieved within the range of 2-5 mg/Nm³ or stricter.</p>	<p>Dust filters have self-cleaning applications and residues are thereafter sent to landfill.</p>	<p>Applicant is still to indicate the expected emission concentration level of dust that shall be achieved within the range of 2-5 mg/Nm³ or stricter.</p>	<p>See Annex 18.</p>	<p>In view that PS2 (MTP Extraction vent) is no longer in use kindly revise its description in the EMP to consider the emission abatement systems for the MTP referred to in WSM replies to BAT No. 25.</p> <p>The EMP needs to be revised to include dust monitoring from the MTP (including rudimentary MRF).</p>	<p>EMP is being updated and shall be submitted to ERA by 26.06.2020.</p>	<p>Noted for inclusion as part of the consolidated application.</p>	<p>Refer to Annex 17.</p>
<p><u>BAT No. 31 –</u></p> <p>Considering the above abatement, applicant is to indicate the expected emission concentration level of Total VOCs from channelled that shall be achieved within the range of 10-30 mg/Nm³.</p>	<p>The total VOCs shall be less than 30 mg/Nm³.</p>	<p>Noted.</p>	/	<p>Kindly note that results for TVOC are to be expressed in mg/Nm³ and proposed ELV in the EMP is to be revised accordingly.</p>	<p>EMP is being updated and shall be submitted to ERA by 26.06.2020.</p>	<p>Noted for inclusion as part of the consolidated application.</p>	<p>Refer to Annex 17.</p>

<u>BAT No. 33</u> WSM to provide replies to BAT No. 2 above.	/	Noted.	/	/	/	/	/
<u>BAT No. 34</u> Operator is to provide details of how contaminated filter media from the wet scrubber and fabric filter washing are handled, stored and disposed of. Such waste water shall be considered in the replies in BAT No. 3 and any associated effluent monitoring requirements. Applicant is to indicate the location of such abatement equipment on a layout plan as per section C1.4.3 of the IPPC application. Furthermore, considering the above abatement techniques, applicant is to indicate the expected emission concentration level of applicable pollutants in Table 6.7 within this BAT Conclusion.	Dust filters have self-cleaning applications and residues are thereafter sent to landfill. A major upgrade is planned so as to be able to treat only source segregated organic waste. A separate variation application is being prepared and this shall incorporate the upgraded / new air handling and treatment systems instead of the existing systems.	Noted. Considering IPPC processing timeframes, applicant is to immediately submit the separate variation application for the dedicated treatment of source segregated organic waste.	OPP variation submitted on 04.03.2020.	Noted.	/	/	/
<u>BAT No. 35</u> – (b) WSM to clarify what is done with the recirculated leachate when/if it reaches a high level of concentration. (c) WSM to provide further details on the compost conditioning process by making reference to specific sections within the original IPPC application as necessary. This shall also include an explanation of how such conditioning minimises the generation of leachate.	(b) Waste Liquor is treated on a daily basis and diverted to the AD Plant. Therefore as such, there is no recirculation. (c) Integrated Pollution and Prevention Control Application Sant Antnin Waste Treatment Plant Operation of a Materials Recovery Facility & Operation of a Mechanical Treatment Plant with Anaerobic Digester (EP021/09/D) Supporting Information July 2013 (Revision 1, February 2014) (Revision 2, February 2015) P24-25, 55	Noted.	/	/	/	/	/
<u>BAT No. 38</u> – WSM to clarify whether the proposed system provides sufficient early warning of system failures which may lead to a loss of containment and explosions and how this is achieved.	Given the simplicity of the system, loss of containment not envisaged. Waste Liquor level in IBC is controlled via level control switch which switches on the pump and transfers waste liquor to AD. This implies that minimal quantities are (temporary) stored in the IBC. In the irregular eventuality of IBC overflow, waste liquor is captured in the secondary containment. Waste Liquor System’s functionality shall be checked for functionality via form SAWTP 065 (twice daily). Therefore, early warning of system failures not deemed necessary.	Noted.	/	/	/	/	/

BAT No. 39 – WSM to make reference to specific sections of the original IPPC application in order to describe how the following techniques are achieved; (a) segregation of the waste gas streams (b) recirculation of waste gas	Abatement systems are described in Integrated Pollution and Prevention Control Application Sant Antnin Waste Treatment Plant Operation of a Materials Recovery Facility & Operation of a Mechanical Treatment Plant with Anaerobic Digester (EP021/09/D) Supporting Information July 2013 (Revision 1, February 2014) (Revision 2, February 2015) P51 The system remains as per original application, although modifications associated with upcoming projects will be the subject of subsequent variations. The application describes the flow of waste gases from the point of generation to the eventual abatement through negative pressure systems.	Noted.	/	/	/	/	/
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