

Annex II: Feedback received following the Statutory Consultation carried out for the renewal and variation application of (IP 0005/13/B)) for Sant’ Antnin Waste Treatment Plant

Timeframes: 30th April 2020– 14th May 2020

Comment received by	Feedback	ERA reply and comment	WasteServ Malta Ltd. reply 18.06.2020	ERA comments 24.06.2020	WasteServ Malta Ltd. reply 02.07.2020
External Consultees Feedback					
Environmental Health Directorate	<p>This Directorate would like to submit the following comments/recommendations regarding this proposal:</p> <ol style="list-style-type: none">1. No water runoff or litter is to exit the scheme.2. Any processing water used within the facility that will have a direct contact with the personnel is to be treated with a biocide for the prevention of Legionnaires diseases.3. Emergency shower and any other infrequently used water points are to be flushed once every 7 days. These should be cleaned, descaled and disinfected every three months to prevent the risk of legionella growth.4. Any Legionella samples results with a positive count of the legionella bacteria are to be notified to the Water Regulator Auditing Unit within the Environmental Health Directorate.5. Pest Control6. Rain and second-class water are not to be used for human consumption or for personal use.7. Kindy note that reference in Annex 2, file name SWATP IPPC permit final, point 2.6.13 is not a recommendation of the Environmental Health Directorate.8. Unpredicted impacts and nuisances which may arise from this operation and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken;9. Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.	<p>Noted by ERA, to be considered as conditions in the IPPC permit.</p> <p>Applicant to describe the pest control measures on site.</p>	<p>Wasteserv has an existing contract with Comtec for pest control services. The contractor has set up a number of bait stations in strategic areas around the facility. Pest control visits are scheduled weekly. However, where necessary, further visits are carried out depending on the site and conditions. Rodent Control Stations are shown in Annex 27.</p>	<p>Noted.</p>	<p>/</p>
Malta Competition and Consumer Affairs Authority	<p>No comments</p>	<p>N/A</p>	<p>/</p>	<p>/</p>	<p>/</p>
Malta Resources Authority	<p>No feedback provided</p>	<p>N/A</p>	<p>/</p>	<p>/</p>	<p>/</p>
Planning Authority	<p>The Planning Authority does not object for the proposed variation application from a planning point of view.</p>	<p>N/A</p>	<p>/</p>	<p>/</p>	<p>/</p>
Regulatory for Energy and Water Services	<p>The REWS has reviewed the file transfer link received from Wasteserv Malta Ltd SAWTP in Marsascala.</p> <p>The Commissioning Report entitled “Secondary Storage Facility Commissioning Report Declaration.pdf” provided within is unsigned and unstamped. It is also not the correct document as this site operates a Commercial site (which includes a fuelling dispenser) and not a Secondary storage facility. This has already been advised by means of separate REWS correspondence with Wasteserv.</p> <p>The reports entitled “Technical Description SAWTP” and the “Technical Proposal Supporting Document” (TPSD) by NB Engineering Services do not reach REWS satisfaction because a number of technical criteria are not fulfilled; this compromises the safety of the people using this fuel installation and the environment. Since not all application requirements have been fulfilled, the REWS could not process this application and this fuel installation remains unauthorised.</p> <p>Moreover the oil water separator/ oil interceptor section of the TPSD is marked as N/A. However the permit IP 0005/13/A entitled “SAWTP IPPC permit Final” mentions the oil interceptor existence and more importantly “Oil interceptor(s)/fuel retention separator(s) shall be installed by an independent warranted architect or engineer as per EN 858.”</p> <p>This conflicts with the TPSD mentioned above and submitted in this round of IPPC consultation by the ERA.</p> <p>Further please note that the “...relevant REWS clearance/ notification/ authorisation as applicable” as described in “Annex 22-Consultation with the ERA” Annex 1 document is still pending. Therefore the REWS is objecting to this Renewal and Variation application for Sant Antnin Waste Treatment Plant.</p> <p><u>Updated dated 21/05/2020:-</u></p> <p>The REWS is lifting the objection to the Renewal &variation ERA application for Sant Antnin Waste Treatment Plant. This is because Wasteserv is now committed to imminently regularize its position on the Petroleum filling Station Commercial Sites and any other fuel storages.</p>	<p>Applicant is to liaise with REWS keeping ERA in copy in order to regularise their position.</p> <p>Once an agreement is reached with REWS, the finalised documentation requested by REWS is to be submitted as part of the Consolidated IPPC application and referenced accordingly in this review.</p> <p><u>Update dated 17/06/2020:-</u></p> <p>Applicant is to provide timeframes by when its position on the Petroleum filling Station Commercial Sites and any other fuel storages with regards to these REWS requirements shall be addressed.</p>	<p>September 2020.</p>	<p>With reference to WSM’s replies to questions C1.4.3 and C2.3 applicant is to confirm that WSM can submit an engineer’s report endorsed by REWS for F8 and decommission the HGO tank by September 2020.</p>	<p>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.</p>
Civil Protection Department	<p>Submission of CPD requirements for such a facility through the enclosed document; Appendix 1.</p>	<p>Applicant is to provide a status update on the current state with regards to recommendations of</p>	<p>Status Update included in Annex 11.</p>	<p>Status update has been noted and referred to CPD. Spray painting activities are not being considered in this application</p>	<p>Noted.</p>

Comment received by	Feedback	ERA reply and comment	WasteServ Malta Ltd. reply 18.06.2020	ERA comments 24.06.2020	WasteServ Malta Ltd. reply 02.07.2020												
		both engineers referred to in CPD's document. The submitted document shall be included in the permit as an approved document, whilst being enforced by CPD.		and was not permitted in IP 005/13/A.													
Water Services Corporation	<div>1. Current status in relation to compliance with regards to the Sewer Discharge Control Regulations (SDCR) is that we are still waiting for WasteServ to forward a plan on how they intend to treat their industrial waste water which is still being discharged to sewer. A the idea of formulating a Voluntary Undertaking was proposed by WSC however this is dependent on the plan that is still to be proposed by WasteServ. In summary, this plant is currently not in compliance with the law.</div> <div>2. I want to draw your attention to the Mass flow plan in Annex 9 which shows the AD Plant producing compost as its product. I feel that this is inaccurate given that it also produces a leachate from the compost bales located under the compost shed. This leachate is collected into a pit below the compost shed. I believe that this is to be reflected in the diagram. This also applies for the interceptor.</div> <div>3. The interceptor should be also noted in the site plan in Annex 4.</div> <div>4. Any rainwater gutters should not be discharged to sewer or mixed with any waste waters.</div> <div>5. From Annex 7, it is clear that the digester pit is scheduled for cleaning periodically. It is being understood that this entails a process of de-sludging of the pit. WasteServ are to indicate how is the sludge disposed of.</div> <div>Update dated 09/06/2020:-</div> <div>Comment No. 1 above to be replaced with: Current status in relation to compliance wrt Sewer Discharge Control Regulations (SDCR), WasteServ will submit a fresh application so that permitting process can continue. Recent extensive cleaning performed on digesters and pit are expected to have marked improvements on effluent being discharged.</div>	<div>1. Applicant is to provide timeframes in this regards</div> <div>2. Applicant is to confirm that compost as a product will not be covered by this IPPC permit application and in case applicant intends to consider it as a product, an IPPC application for variation and an End-of-Waste application is to be submitted. Mass flow diagram is to be amended accordingly.</div> <div>3. Annex 4 is to be amended accordingly to include the whole drainage system associated with this interceptor. Applicant to confirm that oil-water interceptor and drainage system associated with maintenance activities shall be installed and certified by end June 2020 in tandem with the construction of the workshop described in Annex 05 of this application.</div> <div>4. Conditions will be included accordingly. Annex 5 Item 5 indicates that works related to the reinstatement of drainage system of the Reception hall in a manner that adequately captures dirty water within the hall will be finalised by end 2020.</div> <div>5. Applicant to provide requested clarification.</div>	<div>1. Wasteserv is presently compiling a fresh application for a Waste Water Discharge Permit and shall submit it to WSC's attention.</div> <div>2. Confirmed. Mass flow diagram updated.</div> <div>3. Site Plan amended to include interceptor. Refer to Annex 04. Certification of interceptor to take place by November 2020. Reference to the Workshop, Finishing Works shall commence in the coming days.</div> <div>4. New reception hall slab is complete including the leachate collection system.</div> <div>5. The digester pit is the area which houses the AD tanks. It is engineered with hardstanding. Cleaning of this area is done by manual picking and sweeping.</div>	<div>1. Applicant is to provide timeframes by when such application will be submitted to WSC and ERA.</div> <div>2. Noted.</div> <div>3. Noted</div> <div>4. Noted. Conditions will be included accordingly.</div> <div>5. Noted together with below reply to Air Quality Team Internal Consultation.</div>	<div>1. Water Sewer Discharge permit application submitted to WSC. See Annex 32.</div> <div>2. /</div> <div>3. /</div> <div>4. /</div> <div>5. /</div>												
OHSA	<div>In order to establish whether this facility is classified under the COMAH regulations, the applicant is requested to submit a table just for this site, listing the dangerous substances, CAS number if applicable, the maximum quantity and its classification under COMAH as below:</div> <table><tr><th>Substance</th><th>CAS number</th><th>Classification</th><th>The maximum quantity (Tonnes)</th></tr><tr><td>Acetylene</td><td>74-86-2</td><td>Part 2, item 19</td><td></td></tr><tr><td></td><td></td><td></td><td></td></tr></table>	Substance	CAS number	Classification	The maximum quantity (Tonnes)	Acetylene	74-86-2	Part 2, item 19						Applicant is to provide the requested information to OHSA and submit any subsequent correspondence from OHSA.	Refer to Annex 28.	Noted.	/
Substance	CAS number	Classification	The maximum quantity (Tonnes)														
Acetylene	74-86-2	Part 2, item 19															

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Internal Consultees Feedback								
Environmental Assessment Unit	No comments				N/A	/	/	/
Biodiversity & Water Unit	No comments				N/A	/	/	/
Air quality & Waste Unit <i>Air Quality Team</i>	It is proposed that the AER is amended to include the annual mass of waste entering the Anaerobic Digester classified according to EWC codes.				Applicant to provide the EWC codes which is being processed by the AD process. In this regard applicant is to indicate how any resultant sludge following the maintenance of the AD tanks is handled and disposed of in order to prevent emissions to air particularly odour.	20 01 08. Follow tank opening, the sediment (within the tank) would be gradually loaded into self-dumping hoppers and then into an open top container. Once an open top container is completely filled, the container would be covered by a canvas cover and immediately transported to landfill and disposed accordingly. Frequent trips will guarantee that no waste is accumulated at SAWTP. All empty unused waste containers will be cleaned at the end of each working day to prevent odours.	Noted. Noted.	/
Air quality & Waste Unit <i>Waste team</i>	Concerning the 'compost-like' output from the anaerobic digester, the applicants/consultants are referring to this as both as both compost and digestate. However during previous communications with WasteServ (on the end-of-waste criteria of this compost-like output), it was classified as digestate. In this regard, clarifications are requested as to why this is now also being referred to as compost. In our opinion, if this material undergoes only anaerobic digestion, then it should be referred to as 'digestate'. Alternatively, should this processed organic matter also undergo aerobic digestion, then this waste should be referred to as 'compost-like' rather than 'compost' (in view that it does not reach end-of-waste). In addition, we have the following comments on <i>Annex 17 – Environmental Monitoring Programme</i> : 1) <u>Figure 14</u> (pg 11): A different code needs to be assigned to the waste in figure 14 in view that the EWC code 19 12 13 does not exist; 2) <u>MTP Process</u> (pg 18-19): It was noted that only landfilling and transport to the MRF are being referred to as disposal options. The fate of material extracted from the separating process (such as ferrous/nonferrous metals and plastic as indicated in figure 25) is to also be indicated, either in text or in the figure illustrating the process; and 3) <u>Analysis on Compost</u> (pg22): Reference to "Directive 2003/33/EC" should be amended to refer to "Council Decision 2003/33/EC".				WSM to provide clarifications on the compost/digestate references and amend references in consolidated IPPC application accordingly. Applicant is to provide replies/clarifications as part of this review document. Figure 25 in Annex 17 is to be provided as a mass process flow diagram in reply to question C3.11.	At times words are used interchangeably. Material is to be referred to as digestate. Documentation will be update accordingly. EMP is in the process of being updated and shall be submitted to ERA by 26.06.2020. Figure 25 amended.	Noted. Noted for inclusion in the consolidated application. Noted for inclusion in the consolidated application.	/
Air quality & Waste Unit <i>Noise team</i>	In view of the variation to permit, a noise monitoring study is to be carried out once all modifications to the existing plant have been completed and all works related to the development permit have been finalised. The study is to monitor the site under normal operating conditions and having all noisy equipment commissioned and in operation. In particular, the interim MRF sorting line electric engine and conveyor system, which is being introduced by this variation. The attached IPPC ToRs for noise monitoring are being provided as an update to those present in the existing IPPC permit, schedule 5. Moreover, the below comments on the EMP consolidated document in annex 17 are being referred: i) reference to the accreditation (p.39) is to be updated according to the same ToRs; and ii) the assessment is to be in line with permit clause 2.6.9.3, i.e. Not exceeding the marginal significance in BS4142:2014 and not exceeding the baseline noise levels by more than 5dB as per the assessment methodology in BS 4142.				The environmental monitoring proposal is to be amended accordingly. It shall also consider noise generated by the glass handling utilising the wheel shovel in the yard. Appendix 2 below refers.	EMP is being updated and shall be submitted to ERA by 26.06.2020.	Noted for inclusion in the consolidated application.	Refer to Annex 17 .

Comment received by	Feedback			ERA reply and comment	WasteServ Malta Ltd. reply 18.06.2020	ERA comments 24.06.2020	WasteServ Malta Ltd. reply 02.07.2020
Compliance Enforcement Directorate &	Document	Page	Comment				
	Annex 7 & 8	N/A	While we have no comments on the timeframes themselves, it is being suggested that a clear condition is included so that in instances where maintenance and cleaning of essential major plant (e.g. hydrolyser) (which will cause the operation of this part of the plant to stop for a period of time) is set to take place, ERA is informed at least 2 weeks ahead of time of this so any queries which may be necessary from ERA's end can be made accordingly. Current conditions are more related to malfunction or breakdown than the routine cleaning or maintenance.	1. Conditions regarding notifications in case of maintenance and cleaning of essential major plant will be included in the permit.	1. Noted.	1. /	1. /
	Annex 11	Fire Safety Report	The report is two and a half years old. At this point this should be updated to ensure current situation is reflected, or at the very least, include submission of a letter from the engineer confirming the contents of the report still apply as is.	2. With reference to the above request by CPD, kindly submit a status update from an independent warranted engineer with regards to the Fire Safety Report.	2. A negotiated procedure for the necessary upgrades to the firefighting system is currently on the market. Deadline for submissions is 25.05.2020.	2. Noted with reference to the status update reported in Annex 11.	2. /
	Annex 13	Photos of chute	We have no comments on the chutes themselves; however the doors adjacent to these chutes are always open, defeating the purpose of this system. There does not appear to be any obvious references elsewhere in the application to rectify this issue, which is brought to Wasteserv's attention fairly frequently.	3. Kindly propose measures to mitigate fugitive emissions and odours emitted from the doors adjacent to the chutes.	3. The doors adjacent to the chutes will be closed as part of the ongoing OPP upgrade. Furthermore, all openings, existing and new, will be installed with fast acting shutters.	3. ERA requires that the doors adjacent to the chutes are closed and any other openings installed with fast acting shutters by September 2020. With Reference to ERA comments in BAT No. 1 applicant is to provide interim measures to minimise odour generations.	3. Noted.
	Annex 17	EMP	The review and final approval of the EMP is being tackled separately to the renewal application process; however special attention must be given to finalize the sections of this related to land and ground water baseline report.	4. A revised land and groundwater baseline methodology is to be submitted as part of the consolidated application considering the feedback in Appendix 3 (within Annex 1) of this Review. The land and groundwater baseline report will be required as part of the permit.	4. A proposal for land and ground water baseline shall be submitted by 26.06.2020.	4. Noted pending submission as part of the Consolidated Application.	4. Refer to Annex 31 .
	Annex 21	Odour Plan	This plan should take into consideration the desensitization to odour generated by the processes on site, of staff who work on site for long periods on a regular basis. As a comment for EPU, this document could be integral to dealing with the complaints frequently received on site, hence it is being requested that this is made an approved document in the permit in order to make enforceability of it easier.	5. Annex 21 - Odour management plan is to be updated accordingly. Conditions will require the implementation of the odour management plant.	5. OMP shall be updated to specify that monitor is done by a member of staff who does not work at the operational area.	5. Noted pending submission as part of the Consolidated Application.	5. Refer to Annex 21 .
	Annex 23	ADM_EP03_Inspection Report Handling Procedure	Whilst procedure is noted, replies to inspection reports sent by ERA are not always received.	6. Applicant is to provide a reply to the Compliance and Enforcement Directorate with regards to the last inspection report.	6. Reply to Inspection Report dated 21.05.2020 shall be submitted to ERA by 30.06.2020.	6. Noted.	6. /
	Feedback was also provided for each individual Improvement Program Item in Annex 05. For those items which are not addressed ERA is including specific feedback in the thematically associated sections in Annexes 1-3 of this review.						

Terms of Reference for Noise Monitoring

1. Introduction

The noise monitoring shall be carried out by the Operator. A consultant that is either an accredited Acoustic expert or qualified professional Engineer and is approved by ERA according to the following criteria shall be commissioned who will propose a monitoring procedure for measuring noise levels within and around the installation as described in section 2 below.

The person(s) undertaking the “on field monitoring” shall be in possession of a certification for the collection of data.

The noise monitoring and impact study report shall be compiled and reviewed by a person who is in possession of a:

- (a) Bachelors degree in Acoustics, or
- (b) Bachelors degree in any of the following: Physics, Architecture, Civil Engineering or Engineering, Environmental Health, Environmental Science/Management, Occupational Health and Safety, and an MQF Level 7 specialisation in Acoustics, or
- (c) Bachelors degree in any of the following: Physics, Architecture, Civil Engineering or Engineering, Environmental Health, Environmental Science/Management, Occupational Health and Safety and in addition the consultant must be at least an associate member of the Institute of Acoustics or be employed by an organization who are members of the Association of Noise Consultants or equivalent grade of Membership of a professional body for those working in acoustics and noise in any one of the EU member states or any other reputable professional body to the satisfaction of ERA, or
- (d) Certification for the collection of data, such as “Certificate of Competence in Environmental Noise Measurement” issued by the Institute of Acoustics (IoA) or any other equivalent qualification issued by a comparable Professional Association dealing with acoustics in any one of the EU and EEA Member States or any qualifications issued by an educational institution to the satisfaction of ERA and five (5) years experience in noise measurements and assessments.

Copies of such qualifications and certification shall be submitted to ERA prior to the monitoring proposal.

The consultant, in collaboration with ERA, may, where applicable need to consult and seek advice from the Local Council during the selection of the sensitive receptors.

2. Content of monitoring study

The monitoring study should address the following issues:

1. A description of the installation – this shall include a description of all processes carried out on site and related equipment and infrastructures.
 2. A description of the surrounding areas – this shall include identification of the types of activities, whether residential or commercial, roads and other amenities. These shall be location-specific taking into account their location with respect to the site.
 3. Identification of the main sources of noise and vibration – this shall include all processes on site, including aspects such as transport noise on site, plant equipment, mechanical operations, etc (amongst others) and their times of operation.
 4. Identification of the closest noise sensitive receptors – this shall be carried out after assessing the noise levels in the plant’s perimeter and in the other locations identified in point 2 above under normal operating conditions of the plant. The various monitoring points shall be identified with a unique code and an analyses of the ambient noise to which each monitoring point is subjected to.
 5. Environmental Noise Study – this shall include details of the standards used for measurements, equipment used including calibration details and certificates, resultant measurement data, assessment methods and complaints significance scale. The study is to be carried out according to the latest revisions of ISO1996 and the rating of industrial noise affecting residential areas shall be according to the latest revisions of BS4142. The study should include perimeter noise levels, baseline noise study of sensitive receptor sites, noise impact on site sensitive receipts including day and night background levels.
- The data compiled for both day and night is a typical representation of the current situation at all receptor points and the measurement time interval is sufficient enough to obtain representative value of a typical background when the specific noise source will be operating. For facilities that operate continuously for 24 hours, it may be appropriate to measure at a time when all other noises have subsided. If it is possible ‘specific noise’ is estimated by measuring the noise level with and without the facility running.
6. The monitoring shall be performed exclusively using a calibrated type 1 sound level meter conforming to BS 6698/IEC 61672 Class 1. The use of type 2 sound level meters or less is not considered acceptable and will not be considered. The sound level meter, calibrator and microphone must hold a valid current calibration certificate from an accredited laboratory (ex. UKAS)
 7. Prior to the initial data collection and at the end of the monitoring day, all acoustic instrumentation system such as the sound level meters are calibrated, and checked immediately before and after each series of monitoring readings. Results must be within ± 1.0 dB, otherwise discarded and read again.
 8. As a basis for the collection of background data, monitoring shall be carried out during a period when there are no operations at the facility. If this is not possible, operations are to be temporarily suppressed during readings. If this is still not possible, a measurement at an alternative location where the residual sound is comparable to the assessment location(s) with justifications shall be provided.

In case that operating conditions of the site are significantly different during the day, evening or night periods, the measurement procedure will be repeated for those periods of day/evening or night. Therefore, information from the operator is requested prior to the commencement of the measurements. If the information requested is not provided in time, the Consultants will assume that the site operates uniformly during the day, evening and night periods and measure during the daytime only. However, baseline noise levels would still need to be measured at the nearest noise sensitive locations at night in order to determine the impact.

9. The background noise measurements shall be accompanied by a critical listening of all the other noise sources present in the background. Due to certain acoustic features such as tonality, impulsivity and intermittency the inclusion of specific noise level plus any adjustment for the different noise characteristic features, the rating level, L_{Ar}, Tr should be reported in accordance with BS 4142:2014, and any revision thereof, depending on the subjective assessment made while taking the readings.
10. Monitoring shall consider seasonal variations including but not limited to the occurrence of the fireworks and any other similar typical seasonal predominant noise sources. The recommended time periods over a twenty-four hour period are categorized in terms of daytime, from 0700-2300 hrs (L_{Aeq}[16hrs]) and night-time period from 2300 – 0700 hrs (L_{Aeq}[8hrs]).
11. For the propagation of noise from the power plant, the use of ISO 9613, ISO 8297: 1994, ISO 3744:2010 and ISO 3746:2010; and any revision thereof (as per the interim methods of the Environmental Noise Directive 2002/49/EC) is strongly recommended.
12. In the case of multioperator installations where the evaluation and monitoring needs to distinguish between the impact caused by different or interconnected operators within the same installation, the application of the following standards is deemed necessary: standard ISO8297: 1994 and any revision thereof, and ISO37XX series or specifically ISO 9614-2:1996.
13. Impact assessment of noise events on noise sensitive receptor site – this shall include an assessment according to the guidelines BS 4142:2014, ISO1996 and ISO9613 or any other standard and any other standard methodology stipulated by the Authority. A summary of the data obtained after the study has been carried out in relation to the noise sensitive receptors identified above shall be submitted.

14. Conclusions and Mitigation measures – this shall include a summary report of findings from the noise monitoring study including the impact assessment of noise events on noise receptors sites and any remedial action and/or mitigation measures to be implemented by the operator in order to reduce impacts resulting from the site of operation.
