

Our Ref.: EPD/A/RD/12/453

Dr Joe Doublet  
60, Manuel Dimech Street  
Sliema SLM 1057

27 November 2012

Dear Dr Doublet,

**IP 0004/12: IPPC application for Gasparell Baling Plant Ltd**

Reference is made to the response to the above application received on 4 October and 9 October 2012. This application has been reviewed and is considered not 'duly made', meaning that a relevant answer has not been submitted for each question, as indicated in Annex I.

In addition, in line with the IPPC Regulations (LN 234 of 2002 as amended), the IPPC Committee is requesting further information as described in Annex I.

A response addressing the queries in Annex I should be submitted by not later than 19 December 2012. Failure to submit your response by this date will result in the above IPPC application being considered withdrawn.

Should you require any clarifications, kindly contact the undersigned (email: [rachel.decelis@mepa.org.mt](mailto:rachel.decelis@mepa.org.mt), telephone: 2290-7230).

Regards,

Rachel Decelis  
Senior Environment Protection Officer

f/ Dr Petra Caruana Dingli  
IPPC Committee Chair  
Director of Environment Protection

**Enc.:** Annex I: Comments regarding the IPPC application

## Annex I: Comments regarding the IPPC application

### Form B

Section	Duly made?	IPPC Committee comments 27 November 2012	Applicant's response
B2.3	✓	<ol style="list-style-type: none"> <li>1. With regards to the proposal for recovery of gas from air conditioning units, kindly confirm whether the operator will have refillable containers for this gas. Please also indicate where the containers will be stored on site and disposed of/recovered (Document B3.1 to be updated).</li> <li>2. With reference to refrigerated vehicles (including refrigerated containers), prior to any acceptance of such vehicles, the Operator is to submit a Method Statement describing how the dismantling of such vehicles is proposed to be carried out, taking into account all Ozone Depleting Substances (ODS) contaminated materials (e.g. insulating foams, compressor oils, etc.). The Method Statement shall indicate whether (a) the panels will be crushed and ODS and HFC extracted in a closed system; or (b) sent as panels to a European Commission approved destruction facility. The Method Statement shall also indicate how ODS in the refrigerating unit used to cool the refrigerated compartment shall be extracted. No dismantling of such vehicles may take place prior to this Method Statement being approved by MEPA.</li> </ol>	<p>Yes refillable containers will be used and exported</p> <p>Refrigerated vehicles will not be treated on site</p>
B2.7	✓	<ol style="list-style-type: none"> <li>1. With reference to the fuel storage tank: (a) Confirm whether the double-skin can also act as</li> </ol>	The double skin acts as a measure to containing a fluid which detects any leakages since this area would be monitored for such

		<p>bunding, and give the capacity of the double skin.</p> <p>(b) Provide a section of the tank showing the double skin.</p> <p>(c) Confirm that the fuel retention separator will be constructed according to EN 858.</p> <p>Note that the 110% bunding capacity requirement also applies to this tank.</p> <p>2. The response states that “the provision of pressurized water supply and a fire pump and landing valves need to be verified.” Kindly verify that these will be present on site.</p> <p>3. Section E of the Fire plan: The available fire vehicle water connection point should be as required by the CPD, i.e. a pressurized fire hydrant for use by fire vehicles, and should ideally be situated at the entry for the site. Please confirm whether this requirement will be met.</p> <p>4. Please update the fuel leakage plan to correct the address on the plan, and to indicate how the spilt fuel will be disposed/recovered.</p> <p>5. Will any gasoil (diesel) with 0.1% Sulphur content be stored on site? The plan shows only the automotive diesel tank. (Plans to be updated if necessary).</p> <p>6. How would the biodiesel for the shredder, excavators and</p>	<p>purposes.</p> <p>Enclosed (bailing plant Hal far.pdf)</p> <p>The fuel retention separator is not considered as a fuel retention tank, though it would retain fuel in case of a major spill. Thus this requirement should not apply. Moreover, no bund can be provided to a ground recessed tank. Ground recessed tanks are provided with a double skin and a leak detection system for the interstitial space. EN858 does not specify a double skin separator.</p> <p>The CPD comments made in letter dated 3<sup>rd</sup> February 2012 will be met. This has already been stated in previous reviews and is being confirmed again.</p> <p>Enclosed (Hal Far Bailing Plant Em plan Fuel leakage)</p> <p>Diesel used in Malta has a 0.001% maximum sulphur content (<a href="http://www.enemalta.com.mt/index.aspx?cat=2&amp;art=7">http://www.enemalta.com.mt/index.aspx?cat=2&amp;art=7</a>) and that is the only diesel which will be used.</p> <p>We have only stated that diesel/ biodiesel will be used on such</p>
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		vehicles be supplied?	equipment. This could be supplied on demand by tanker trucks.
B3.1.1, B3.1.2, B3.1.3	✓	<p>1. Provide an updated site layout plan which shows the storage location of the following (or clarify with reference to the terminology used in the site layout plans):</p> <ul style="list-style-type: none"> <li>- Brake fluid</li> <li>- Water based fluids</li> <li>- Absorbents</li> </ul> <p>2. For the following materials, please confirm whether the below bunding requirements will be met (the greater of the following will apply):</p> <ul style="list-style-type: none"> <li>- 110% of the capacity of the largest container within the bunded area</li> <li>- 25% of the total volume of substance which could be stored within the bunded area.</li> </ul> <p>(a) brake fluids (b) other antifreeze liquids (c) batteries (d) antifreeze fluids (e) engine, gear and lubricating oils</p> <p>3. It is understood that there will be no storage of ELV vehicles after depollution, as these would be immediately shredded and the waste metals would then be stored as detailed in p. 5 of B3.1 (and p. 4 of B2.2). Please confirm.</p>	<p>Brake fluids are found under the term Oils. Absorbents are referred to as absorbents. Water based fluids were never mentioned under section 3.1. Updated plan enclosed (09059-04_02 Proposed Stores Plan) .</p> <p>Yes will be met</p> <p>Confirmed</p>
B3.5	✓	1. Does the baling machine use electricity or fuel? If the latter, its emissions need to be included in this document.	Electricity

		<p>2. The excavators/shearers are not clearly marked in Figure 1 – please update. Please also confirm whether they are stationary or mobile plant.</p> <p>3. For the baling machine (if it uses fuel) and the excavators/shearers, provide the following:</p> <p>(a) Site layout plan with the engines marked (this would be referred to in any IPPC permit that is issued).</p> <p>(b) Rated thermal input.</p> <p>(c) Efficiency/energy output.</p> <p>(d) Date of manufacture.</p> <p>(e) Stack height.</p> <p>(f) If available, data on expected air emissions (concentrations) of NO<sub>x</sub>, SO<sub>2</sub>, CO and dust. Note that monitoring from such plant would be likely to be required, at a frequency to be specified in any IPPC permit that is issued.</p> <p>(g) Confirm the type of engine (e.g. diesel engine).</p> <p>4. Regulation 28 of LN 478/10 requires a stack height of at least 3 metres above roof level and greater than 3 metres above any habitable floor within a 25 metre radius. Please confirm whether this can be met for the combustion plants proposed.</p>	<p>Cannot be marked since they are mobile</p> <p>Enclosed (090509-01_01 Proposed Block Plan_final)</p> <p>3 Volvo Excavators (1997)/shearers</p> <ul style="list-style-type: none"> <li>• Engine – Volvo 350 HP 12Ltr Diesel</li> <li>• 1 Excavator work every day</li> <li>• 2 Excavators work every 3 days per week</li> </ul> <p>Shredder (1995)</p> <ul style="list-style-type: none"> <li>• 1 Diesel engine</li> <li>• Make AGO-SACM V12 – 1900Hp @ 1500 Rpm</li> <li>• Electric Motors</li> <li>• 10 Electric Motors 3 Hp</li> <li>• 1 Electric Motor 7 Hp</li> <li>• 4 Electric Motors 30 Hp</li> <li>• 6 Electric Motors 5 Hp</li> </ul> <p>Yes, can be met</p>
B3.7	x	<p>1. If operation during weekends is proposed, the report would need to be updated to include the effect of mitigation measures.</p>	<p>The report was based on the worst case scenario and the mitigations proposed should be sufficient to address any of the noise impacts which could be generated during the different</p>

		<p>2. Noise predictions need to be carried out on all operations, not just on the noisiest equipment, as other less noisy equipment could contribute to the total noise climate. Please update the noise study to include contributions from the following equipment, and any other noise-generating equipment:</p> <ul style="list-style-type: none"> <li>(a) Shearer</li> <li>(b) Loading shovel</li> <li>(c) Wire stripping equipment</li> <li>(d) Air bag deployment</li> <li>(e) Fork lifter</li> <li>(f) Trucks</li> <li>(g) Equipment which removes tyres from rims</li> <li>(h) Plastic baler.</li> </ul>	<p>phases of development. We are confident that the mitigation measures which will be undertaken will not result in the predicted noise levels identified in the report but lower levels. The reason why noise reports are based on the worst case scenarios is so that one would obtain a hypothetical prediction of noise levels which could result in a remote situation. The proposed mitigation measures such as shielding around the shredder which was not even recommended in the noise report and the other equipment (wire stripping machines, air bag deployment, tyre rim remover and plastic baler) which still has to be ordered and bought and which will be housed indoors should address in a sufficient manner any noise impacts which will be generated on site. The updated report includes details and justifications why such a scenario is taken into consideration. Furthermore, the different noise sources for which a value was available were taken into consideration in the assessment, the only ones which were omitted are the smaller less noisy units which will be housed indoors.</p> <p>The only way how one could check whether the predicted noise levels will be exceeded is through real-time monitoring and comparison with the predicted noise levels. This will not be possible until such time when MEPA would be able to issue a planning and operational permit so that such readings could be obtained and it is only then that one would be able to ensure that all the mitigation measures which were undertaken are sufficient. Such an approach is the best practice which is normally applied under such circumstances.</p>
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