

Replies to the latest Inspection Report (Inspection dated 7th September 2018)

Aspect	Detailed Observations	Actions Required by Operator	Reply by WSM
Odours in and Around the Facility	Odours on the way to and within the facility were considered normal for the operations being carried out at the time.	N/A	No action needed.
Tipping Face (Cell 8)	<p>The officers inspected the tip face and discussed the decreasing void space available for backfilling and the urgent need for Cell 9 to start being utilised (see Photo 1).</p> <p>The waste acceptance procedure at Ghallis was discussed and it was established that at no point in the facility's operations were all trucks delivering waste being diverted to MBT North prior to reaching the tipping face. Evidence of mixed loads which include potentially recyclable material such as wood, plastics and cardboard were noted on the tipping face.</p>	<p>See point related to Cell 9 below.</p> <p>In view of the limited void space available left for backfilling, notwithstanding the burden on MBT North due to the burning down of the Sant'Antnin Waste Treatment Plant, operator should submit a proposal in order to decrease the amount of landfilled material as part of the renewal and variation process for Ghallis Non-Hazardous Landfill.</p>	<p>Noted.</p> <p>The main waste streams which are going to landfill include:</p> <ol style="list-style-type: none"> Mixed MSW particularly from the commercial and industrial sector and for which current treatment capacity is not available; Bulky waste which should be treated at the MN bulky line but due to the loss of the SAWTP MRF, dry recyclables are being processed instead; Rejects from waste treatment processes. Sewage sludge. <p>Note that the production of high calorific waste rejects, internally known as RDF, is now being exported directly by Wasteserv.</p>

			<p>WSM is actively working on diverting the dry recyclable waste away from the bulky line at the MN so that the bulky waste can be processed before being landfilled. This is being done by:</p> <ul style="list-style-type: none"> i. The procurement and eventual commissioning of a rudimentary MRF at SAWTP; ii. Exploring and pushing forward the export of dry recyclable to other third parties both local and abroad. iii. The procurement, design and building of a new MRF; <p>Moreover, WSM is actively participating in other waste diversion initiatives, including:</p> <ul style="list-style-type: none"> a. The nationalisation of the collection of the source segregated organic waste; b. Alternative mechanisms to enhance the source segregation of recyclables; c. Introduction of a Waste to Energy facility. <p>Therefore, WSM cannot act on its own to reduce the landfilled material and a cultural shift is needed.</p>
New Cell (Cell 9)	TCP stated that the whole cell has been relined following the discovery that the initially ordered material was inferior in quality and that Wasteserv is awaiting ERA's review of the Construction	Operator is to ensure that no waste is deposited in this area prior to clearance being issued by the Authority.	Noted. Review of the Construction Quality Assurance Report was carried out by ERA and consent was given to start landfilling.

	Quality Assurance Report in order to start using this part of the landfill.			<p>Due to the fact that new landfill cells were being constructed in parallel to the adjacent landfilling of waste, ponding of leachate in specific areas within the lined areas occurred. Now that all the Ghallis landfill is lined and waste is being deposited in cell 9, the ponding issue has been eliminated.</p> <p>WSM is utilising the on-site recirculation method which is the only method currently available. However, WSM acknowledges that in the long term excess and concentrated leachate would need to be removed from the landfill so as not to inhibit the degradation of the biodegradable waste.</p> <p>WSM is trying to adopt general European practices whereby such liquid waste is treated by a waste water treatment entity. Negotiations on a possible solution with WSC are ongoing. However, if this fails, WSM is committed to enhance its waste water treatment systems to be able to treat also leachate. This shall be based primarily on the SLR study of April 2016 – Leachate Management and Disposal Options Report.</p>
Leachate Management	Quite a large pool of leachate was noted at the bottom of Cell 9 which was observed to be being collected by two water tankers (see Photo 2).	As instructed in the previous inspection reports, Wasteserv is to take steps to prevent the build-up of pooled leachate within the facility for extended periods of time. A progress update on this should be provided to ERA within 1 month of the date of the covering letter to this inspection report, along with timeframes envisaged for the completion of the Leachate Management Plan envisaged in the permit's Improvement Programme.		No action needed.
Excavated Cell (formerly known as Hazardous Cell)	Further extensive excavations have been carried out in the cell originally intended as being a hazardous waste cell. Material generated through	N/A		

RDF Storage	<p>these excavations is being stockpiled, crushed and removed offsite by a third party contractor.</p> <p>A considerable amount of RDF is still being stored in one part of this excavation, most of which is buried and some of which was lost due to a major fire incident on 31st August 2018.</p> <p>A new baler was noted being delivered during the time of the inspection</p> <p>The area of the fire incident was visited and the fire incident and the response to it was discussed with the TCP (see Photo 3).</p>	<p>It was established on site that the stockpiled and buried RDF is being moved and extracted by a third party contractor, the integrity of the bales checked and if necessary it is re-baled and then exported through a TFS permit issued by the Environment and Resources Authority to PTMatic.</p> <p>Operator is reminded that a formal Fire Incident Report containing the details laid out in Schedule 1 of the Permit within 2 weeks from the date of the covering letter to this report.</p>	<p>High calorific waste rejects, internally known as RDF, which was temporary stored is being exported through a TFS procedure.</p> <p>A report of the fire at the formerly known hazardous cell was sent to ERA.</p>
New Quarantine Area	<p>A quarantine area was observed to have been moved to the side of one of the roads leading to the tipping face next to the Old Wheel Washing Area and</p>	<p>Operator is to ensure that the newly designated quarantine area is indicated on the site layout plan as part of the Permit Renewal Process.</p>	<p>Noted and this is included.</p>
Wheel Washing Areas	<p>The new wheel wash in front of the new weighbridge of the facility was noted not to be in use at the time of the inspection. From what could be observed, the old wheel washing area is still in regular use.</p>	<p>As already instructed in the previous inspection reports, Wasteserv is to ensure that the old wheel washing area is kept in the present state of clean lines and to ensure the wheel washing of vehicles prior to exiting the facility in order to prevent waste transfer to the roads outside.</p>	<p>The old wheel washing area is still in regular use. This is so until the defects related to the newly installed wheel washing facilities are agreed upon and resolved by the building contractor.</p>