

**Annex II: Feedback received following the Statutory Consultation carried out for the IPPC permit application of WasteServ Malta Ltd. carried out between 5<sup>th</sup> December 2018 – 11<sup>th</sup> January 2019 for the Ghallis non-hazardous landfill.**

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<b>--- External Consultees Feedback ---</b>					
<b>Environmental Health Directorate</b>	<p>With reference to request to provide any comments on the contents of such application regarding subject in caption, please be informed that this Directorate would like to submit the following comments/recommendations regarding this proposal: The proposed changes of this IPPC renewal/variation Ghallis Non-Hazardous Landfill.</p> <ol style="list-style-type: none"> <li>1. With these variations the Directorate has no objection;</li> <li>2. As a Directorate we agree with the comments submit by ERA</li> <li>3. More information is need with regards of the use of Fog Cannon as identified in Table 2 Page 19 of the PDS</li> <li>4. No water runoff or litter is to exit the scheme.</li> <li>5. Ground water is to be monitored and necessary remedial actions to be taken.</li> <li>6. Pest Control</li> <li>7. 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;</li> <li>8. Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant.</li> <li>9. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.</li> </ol>	Applicant is to provide feedback on point 3. Permit conditions will address all the other comments.	The fog cannon will be deployed upwind of the work area, to provide a fog over the odours material and promote its settlement.	Permit conditions will be included accordingly.	/
<b>Malta Resources Authority</b>	No further comments.	/	/	/	/
<b>Planning Authority</b>	No feedback provided.	/	/	/	/
<b>Regulatory for Energy and Water Services</b>	Reference is made to Annex 8 of the document Review of IP_01_06C_Dec2018 were the diesel fuel Tank and the REWS are mentioned. The REWS is in contact with Wasteserv in order to regulate its position on liquid fuel storages. The Regulator to date has not yet received a valid	With reference to any existing and proposed fuel storage and dispensing facilities on site, applicant is to provide feedback accordingly including the	The registration process with REWS is in the process of being addressed.	This will be included as an Improvement Program Item within the IPPC permit.	Noted.

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	<p>and complete application for the storage of liquid fuels at Ghallis Non-Hazardous Landfill. Furthermore REWS has the following minor comments:</p> <p>a) Document named Annex 05, Clause 3.2.5 of document IP 0001-06 Summary Audit Report and Table 2 found within state: 3.2.5 Although the site had a small building used for the storage of fuel and oil drums etc there was a gap beneath the door through which liquids could escape in the event of spillage or leakage from the tank or a drum. The REWS will be in a position to comment on Fuel Storage safety and containment, when the complete application (including referenced documentation within) is submitted to the REWS.</p> <p>b) The document Ghallis Closure Plan_Final Version - clause 3.1.7 states that there is no fuel on site. 3.1.7 Bunds/Fuel Storage There are no fuel storage facilities at Ghallis. If, in the future, any fuel storage facilities were required, then these would be appropriately bunded. These facilities will be removed from the site following completion. This information provided here conflicts with other information given in other documents found in the CD.</p>	necessary engineer's reports and applications to be submitted to REWS. When submissions are not readily available, time-frames by when these shall be satisfactorily addressed are to be provided.			
<b>Civil Protection Department</b>	<p>With respect to the Emergency Response Plan Annex 10:</p> <ul style="list-style-type: none"> <li>In Page 17 of Controlled Document 108 under Notifications title. All the emergency services are mentioned except the Civil Protection Department.</li> <li>Under the External Organisation of the Controlled Doc 18a Contact Numbers again it is missing. The Civil Protection email: civil.protection@gov.mt contact number 23930000, and not just 112.</li> <li>Under equipment section please note that in page 20 there is a picture Step 8. The picture is showing a rolled hose. Please note that the hose is rolled the wrong way it should be made on the female coupling and not on the male as it is in the picture as much time is wasted to correct the hose in an emergency and one can also get injured when running it the wrong way.</li> <li>Spill kits. I believe that the spill kits are regularly</li> </ul>	<p>Applicant is to update the plan to include:</p> <ul style="list-style-type: none"> <li>Reference to the CPD and the following contact details@ The Civil Protection email: civil.protection@gov.mt contact number 23930000,</li> <li>Update page 20 accordingly</li> <li>To provide further information on the spill kit and firefighting equipment maintenance program/schedule.</li> </ul> <p>Following further consultation with CPD, conditions regarding the maintenance of the ERP will</p>	<p>Answer 1: Page 17 refers to which authorities need to be notified in case of an emergency (ex. OHSA need to be notified in case of an injury, whereas ERA need to be notified in case of a spill or fire. CPD do not necessarily need to be notified unless their intervention is required to assist our Emergency Response Team. This is included in the flowchart as part of the emergency procedure. In any case, CPD's contact number will be included in Controlled Doc 108a Contact Numbers just in case the Emergency Response Team need their direct line.</p> <p>Answer 2:</p>	<p>CPD have advised that they fully agree with the contents written, and suggest that WSM have a list of water carrier hawkers readily available so that if and when CPD need they come immediately on site. Last and not least it is of utmost importance that the report made should rigidly be followed by WSM.</p>	<p>Wasteserv issuing a tender for the provision of water by water carrier hawkers.</p>

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	<p>checked and if anything out of the spill kit is missing it is replaced immediately.</p> <ul style="list-style-type: none"> <li>As regards the whole Emergency Response Plan. I hope that exercises such as table top exercise with all those involved is set up and held among all those involved simulating various scenarios to check the response and if they know the response procedures well and how it works.</li> <li>Clarification on whether WSM keep record of the firefighting equipment maintenance schedule etc.</li> </ul>	<p>be provided in the permit. This will include the requirement that at least once a year a table top exercise is held between all those involved to check if all those involved still remember the emergency procedures this should be made following the issue of the permit within and within a prescribed time-frame. The exercise should be logged and recorded.</p> <p>Document "MEC EPO2 Emergency Preparedness &amp; Response Procedure" refers to the Works Manager being responsible for "Checking that fire water bowzers are available at all times" and "checking that fire-hoses and fire pumps are in good working condition" amongst others. Operator might wish to provide further clarifications/confirmations to CPD's query.</p> <p>Kindly also refer to comments by the ERA in the main review document.</p>	<p>Noted.</p> <p>Answer 3: Noted.</p> <p>Answer 4: H&amp;S Leaders at MN and the landfill carry out weekly / monthly checks as per forms MN010 MN Emergency Equipment Checklist and MEC008 MEC Emergency Equipment Checklist.</p> <p>Furthermore, the firefighting equipment is maintained and certified by an appointed contracted on a quarterly basis whilst the fire detection system is maintained and certified by an appointed contractor on a bi-annual basis. Refer to the fire certification schedule.</p> <p>Answer 5: Noted.</p> <p>Answer 6: Refer to answer 4.</p> <p>See Attachment 14.</p>		
<b>Water Services Corporation</b>	<p>The leachate emanating from the landfill is currently being recirculated. This waste water is not permitted to be discharged to sewer unless an application for this is submitted.</p> <p>If WasteServ intends to discharge the leachate, proper treatment facilities must be in place which will have to be inspected by DPU inspectors as part of the permitting process.</p> <p>Any rainwater runoff should either be channelled to road surface or else stored in a reservoir. Under no circumstances can this be directed to sewer or a cesspit which is ultimately discharged into the sewer.</p>	<p>As indicated in Annex I, ERA requires a long-term plan for a leachate treatment system which meets the relevant regulatory requirements.</p> <p>WSC requirements will be included as permit conditions.</p>	<p>Wasteserv is currently in the process of identifying the technologies required for treatment of leachates. To this end, the following study SLR (2016) <i>Ghallis Non Hazardous Landfill: Leachate Management and Disposal Options Report</i> was commissioned to determine the options that were available. Consideration of the leachate parameters highlighted the need for more detail with respect to the design of appropriate</p>	<p>Noted, regular updates will be requested during the application process.</p>	<p>Noted.</p>

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			leachate treatment solutions, with the result that Ing. Marco Cremona has been contracted to assist in the identification of solutions that will result in pilot trials.  Permitting processes related to leachate treatment infrastructure are planned for 2019, with initial pilot trials being scheduled for 2020.		
<b>OHSA</b>	No feedback provided.	/	/		/
<b>Energy and Water Agency</b>	Please note that from a water perspective we have no objections to the proposal.	/	/		/
<b>--- Internal Consultees Feedback ---</b>					
<b>Environmental Assessment Unit</b>	Kindly note that this application was screened according to the EIA Regulations, 2017 (S.L.549.46). Detailed EIA screening has determined that the proposal per se is not likely to have significant effects to the point of warranting an EIA or an EIA Update. Our reply is available on e-apps as minute PA 01586/18/25a.	ERA issues raised in PA 01586/18/25a are to be addressed.	These are being addressed via eApps submission.	Noted.	/
<b>Biodiversity &amp; Water Unit</b>	Regarding the monitoring program: a) Tables 11.1 and 11.2 should also include the Limit of Quantification (LOQ) for each analysis. For the screening list (Appendix 2) – the limit of detection and limit of quantification should also be specified, with the LOQ being at least 30% the value of the AA-EQS, to the extent possible. This is important in order to assess potential impacts on the objectives stipulated by the WFD for coastal water bodies.  b) Contractor to specify which type of hydrocarbons will be monitored (table 11.1 and 11.2).	Operator is to provide an updated Environmental Monitoring Program in reply to the feedback which shall be provided separately by the Compliance and Enforcement Directorate.	Addressed through new EMP. See <b>Attachment 10</b> .	Attachment 10 does not refer to effluent monitoring. It is understood that reference should be made to the new EPM currently being discussed  The permit will require that testing for hydrocarbons will form part of the quarterly monitoring (indicator monitoring) and will address relevant hydrocarbons on the basis of the characterisation process.  The EMP is to be updated accordingly.	These issues are being addressed in the final EMP currently being discussed with ERA.

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<b>Ambient Quality &amp; Waste Unit</b>  <b>Air Quality &amp; Noise Team</b>	<p>It is to be noted that so far we have not received any updated noise study or monitoring programme following our previous comments on the "Report of Noise Survey" dated May 2018. In particular, we refer to the below recommendation no. 54 – an appropriate analysis was not carried out to confirm this.</p> <p>The attached noise study includes recommendations which can be considered for the review of the renewal of the IPPC permit:</p> <p><b>RECOMMENDATIONS FOR MITIGATION AND NOISE MONITORING PROGRAMME</b></p> <p><u>54. Having regard to the results of the noise survey, and assuming that activity levels within the MEC remain at current levels, it is recommended that further monitoring and reporting of the ambient noise levels during the night at MP 2 and MP 3 is not necessary. Noise levels recorded at MP 2 and MP 3 during the night were compliant with the conditions of IP 0007/13/A, IP 0001/06/B and IP 0001/05/B, and the assessors observed only very limited noise arising from the MEC at these locations during the night.</u></p>	<p>With reference to the submitted "Report of Noise Survey" dated May 2018", applicant is to provide an updated report addressing the below:</p> <ol style="list-style-type: none"> <li><i>1. Repetition of the survey for a 1 hour measurement period is not necessary here. Only a calculation for the reference time interval adjustment is necessary, which is given in the BS 4142:2014, equation no 3 on p.7. However all LAeq values used for all monitoring locations should be corrected for penalties due to the effect of the predominant noise sources from the MEC noises. Thus the specific sound level (LAeq + Rating level) should then be adjusted for 1 hour reference time interval (in the case of MP 1 only).</i></li> <li><i>2. Not exceeding the marginal significance in BS4142:2014 and not exceeding the baseline noise levels by more than 5dB are referring to the assessment methodology of BS 4142 which requires that such difference is obtained when comparing the operational sound levels in 2018 (specific sound level: LAeq + penalties) with the baseline sound levels in 2014 (LA90). Background sound level</i></li> </ol>	<p>Addressed through new EMP. See <b>Attachment 10</b>.</p>	<p>Noise data submitted in Attachment 10 has been noted. The EMP is still to be revised accordingly as advised by the CED and indicating previously herewith.</p>	<p>These issues are being addressed in the final EMP currently being discussed with ERA.</p>

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		<p><i>in BS4142 is defined as LA90.</i></p> <p><i>The above is also quoted in the permit conditions below:</i></p> <p><i>2.6.9 Should the noise levels during operation of the installation exceed the recommended level of marginal significance in BS4142:1997 and its subsequent amendments and the WHO guideline values for community noise in specific environments, the Authority reserves the right to request further remedial actions and monitoring.</i></p> <p><i>Document IP 0007/13/A IPPC Permit for Malta North Waste Treatment Plant</i></p> <p><i>Thus the assessment carried out in tables 6 is to be revised accordingly.</i></p> <p>The below are some additional comments noted in the noise study report:</p> <ol style="list-style-type: none"> <li><i>3. A copy of Consultants CV is to be submitted.</i></li> <li><i>4. Typo mistake in Table 6: MP2 baseline noise values for LA90 should read 48dB, for LA10 should read 67dB</i></li> <li><i>5. The consultant is to provide the time period</i></li> </ol>			



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		<p><i>and the timeframes when the operational noise survey in 2014 were carried out (for values in Table 7) as they need to be similar to those measured in 2018, i.e. between 0800-1000 for a period of 1 hour.</i></p> <p>6. <i>Has there been any analysis carried out for the weekend as works are carried out both at Ta' Zwejra and MEC on Saturdays and Sundays.</i></p> <p>Baseline data is not available for 2014 for night time however ERA suggests that at least this is compared with the background noise levels (LA90) obtained in 2018 during operational. As this falls within the same clause of the permit condition mentioned above and in order to confirm whether it is appropriate that the night time noise measurements for MP2 and MP3 will cease in the upcoming AER as suggested by the consultant and in connection with the variations proposed by this application.</p> <p>Applicant is to take note of the required updates and revise the Environmental Monitoring Program as requested separately by the Compliance and Enforcement Directorate.</p>			
<b>Ambient Quality &amp; Waste Unit</b> <b>Waste Management</b>	<p>Construction Method Statement (Annex 19):</p> <ul style="list-style-type: none"> <li>Section 2.6 (page 12) states that the side slope of the excavated area will be adjusted to be no more than 30° to meet stability.</li> </ul>	<p>Operator is to provide the requested feedback.</p> <p>Annex 18: Operator is to provide an updated Environmental Monitoring</p>	Refer to comments provided in review process that are relevant to the EMP.	Applicant is to submit the following documents (as updated through PA 1586/18) addressing these requirements as part of the IPPC Consolidated Application:	Noted. The information and assessments related to the long-term stability of the retaining structures in the following:

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<b>Team</b>	<p>However, in Section 2.7 (same page), it is indicated that the side slope of the excavated area will be sloped at 40°. In this context, the applicant is kindly requested to provide clarifications to ensure that aforementioned statements are consistent.</p> <ul style="list-style-type: none"> <li>○ Section 2.6 (page 12) indicates the use of shredded tire chips as an alternative material to be used as a layer of terrain over the excavated face. It should be highlighted to the applicant that as per regulation 6 of S.L.549.29 – the Waste Management (Landfill) Regulations, shredded used tyres should not be accepted in a landfill. This also applies to the use of shredded tire chips as daily cover, as indicated in Section 2.8 (page 15).</li> <li>• Daily cover <ul style="list-style-type: none"> <li>○ In document “2018 June Ghallis renewal &amp; variation v 2.2” page 3, the applicant notes that they are seeking consent for “The use of selected wastes such as non-odorous Malta-North rejects, as daily cover”. Further clarifications as to what waste streams are intended to be used should be provided. In addition, such statement is not included on page 5 of the same document when referring again to the scope of the permit renewal.</li> </ul> </li> <li>• Annex 18: The Waste Team is currently in the process of reviewing the Consolidated Environmental Monitoring Programme (August 2018), and comments will be provided on this document rather than the Environmental Monitoring Programme (December 2014) which was attached to the application.</li> <li>• The applicant is to provide details as to how the retaining wall structure is to be maintained in the long-term and after closure of the landfill.</li> </ul>	<p>Program in reply to the feedback which has been provided separately by the Compliance and Enforcement Directorate on 21<sup>st</sup> January 2019.</p>		<ol style="list-style-type: none"> <li>1. Construction Method Statement</li> <li>2. Stability Risk Assessment</li> <li>3. Hydrological Study.</li> </ol> <p>Applicant is still to provide details as to how the retaining wall structure is to be maintained in the long-term and after closure of the landfill.</p> <p>Comment no. 7 on Annex 2: Clarification is required with regards to the Void space value provided. Is the value provided Gross or Net void space?</p>	<p>2.1.5 Waste Mass Screening, 2.5.6 Parameters Selected for Capping Analyses (Reinforcement element – Geo-net), 2.6.6 Factor of Safety for Capping System, 2.7.5 Waste Analyses (for settlement during the years), 2.7.6 Capping Analyses, 2.8.5 Waste Assessment, 2.8.6 Capping Assessment, 3.1.5 Waste Mass Monitoring, 3.1.6 Capping System Monitoring, Appendix G and Appendix I (settlement during the years).</p> <p>Figure provided is gross.</p>



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	<ul style="list-style-type: none"> <li>Leachate <ul style="list-style-type: none"> <li>Further details are required with regards to the long-term plan for leachate management and treatment, and the noted 2020 pilot treatment system as mentioned in "Annex 7: Leachate Management" and document "2018 June Ghallis renewal &amp; variation v 2.2". Such information should be included in the "Ghallis Non Hazardous Landfill Closure Plan".</li> </ul> </li> <li>Annex 6: On the replies provided by WasteServ Malta to the Inspection report dated 7 September 2018, the Waste Team would like to highlight the following: <ul style="list-style-type: none"> <li>Tipping Face: it should be highlighted to the applicant that all waste directed to landfill should be treated prior to being landfilled. In addition, this would also help reduce the volume of waste landfilled, especially through the stabilization of the organic fraction within mixed municipal waste. Furthermore, improving the landfill waste acceptance criteria may aid in diverting wastes away from landfill; waste streams which would be better suited to be managed in other ways.</li> </ul> </li> <li>Comments on Annex 19: <ul style="list-style-type: none"> <li>It should be highlighted that as per regulation 6 of S.L.549.29 – the Waste Management (Landfill) Regulations, shredded used tyres should not be accepted in a landfill.</li> </ul> </li> </ul>				
<b>Compliance &amp; Enforcement</b>	Refer to Annex I for further comments.	/	/	/	/