

**Part A**

Section	Duly made?	MEPA comments	Response
A1.1	✓	Noted.	
A1.2	✓	Noted.	
A1.3	✓	Noted.	
A1.4	✗	<p>A planning application is necessary to incorporate all required changes in the layout, additions, alterations and engineering works as defined in section 67 of Environment and Development Planning Act and namely but not exclusively the sanctioning of/application for :-</p> <ul style="list-style-type: none"> <li>- the quarantine area;</li> <li>- all structures including garages, free standing structure, generator room, cesspit;</li> <li>- changes to the general layout and alterations to access to the site;</li> <li>- hardstanding</li> </ul> <p>The processing of such application shall also incorporate its screening for any relevant studies including a potential EIA update.</p>	<p>An application has been submitted to MEPA and is currently being processed.</p> <p>Application Tracking No: 149064</p> <p>Please note that the hardstanding was already covered by the original permits.</p>
A2.1	✓	Noted.	
A2.2	✓	Noted.	
A3.1	✓	Noted.	
A3.5	✓	Noted.	
A3.6	✓	Noted.	

**Part B**

Section	Duly made?	MEPA comments	
B1.1	✗	Kindly confirm whether any refuelling operations are carried out on site. If yes, please list as a directly associated activity. In addition, please also note that vehicle/equipment servicing and maintenance, and the use of generator/s are not included in the list.	The application form has been updated.
B1.2	✓	Noted.	
B1.3	✓	Noted.	
B1.4.1	✗	<p>Kindly clarify whether all areas within the installation are equipped with a hardstanding. In particular, please specify whether the large garage used for servicing of vehicles (quoted in table 1) is equipped with an impervious floor.</p> <p>Please also indicate the different waste streams that are temporarily stored in the unroofed Bin 6.</p>	<p>Please note that all of the site is now a hardstanding area.</p> <p>All roofed structures including the sheds, garages and Bins 1-6 etc are floored with an impervious flooring. This was done under architect's instructions to the contractor who carried out the works. The surfaces are powerfloated concrete with an additive added to the top layer to render impermeable.</p> <p>Kindly note that all Bins are now roofed. The Bins are used for temporary storage according to changing requirements and it would be counter-productive to allocate a specific Bin to a specific type of waste. Generally, the larger ones, Bin 1-3 are used for liquid/sludges/chemicals etc whereas the smaller ones ie Bins 4-6 are used for WEEE however this is not a hard and fast rule. All Bins are constructed in exactly the same manner with exactly the same ventilation systems, impervious flooring, access to spill channel and fire points. Logistics and space constraints sometimes require the flexibility of a switch-around.</p>

B1.4.2	✓	Noted.	
B1.4.3	✓	Noted.	
B2.1	✗	Noted. The EMS does not specify contact details (including telephone & mobile numbers) of Site Manager for emergency purposes.	Please note that the copy of the EMS submitted to you is lacking Document 20 which contains contact details. This is sensitive information (private mobile numbers and home numbers) and therefore an amended version with this section excluded was submitted with the application.
B2.2	✗	<p>Noted. In view that diesel is being stored on site, you are kindly requested to register the storage with the Malta Resources Authority using the attached application form. The storage has to be inspected and approved by an engineer (&amp; competent person under LN 53 of 2010). The list of competent persons may be viewed on the following:  <a href="http://www.mra.org.mt/Downloads/licences/List%20of%20Competent%20Persons%20in%20Petroleum-Filling%20Stations%20-%202012-02-06.pdf">http://www.mra.org.mt/Downloads/licences/List%20of%20Competent%20Persons%20in%20Petroleum-Filling%20Stations%20-%202012-02-06.pdf</a></p> <p>Furthermore, if company owns fuel road tankers or bowlers, operator shall register these vehicles with the MRA. In doing so, a clearance of these shall be required from Transport Malta.</p>	<p>Please note that the only fuel stored on-site is only for refuelling the generator and forklift. There is no fixed structure/tank which is present onsite.</p> <p>I was in touch with Engineer Stephen Mifsud from the MRA who confirmed to me that as per LN 53 of 2001 storage of diesel fuel in cases of 300L-3000L requires a notification to the MRA and above 3000L requires an Authorisation. In our case the fuel stored on-site is appropriately stored in 8X25L jerrycans for a total of 200L when all full. He confirmed that therefore no action needs to be taken.</p> <p>This is not applicable. All vehicles owned by the company and their specific use are clearly described in the application.</p>
B2.3	✓	Noted	
B2.4	✓	Noted.	
B2.5.1	✗	Noted. Water intended for human consumption and/or personal use should be from an approved source and in conformity with the requirements of Water Intended for Human Consumption Regulations, 2009-L.N. 17 of 2009 as	All water intended for Human Consumption on site, as described in the application, is commercially available bottled water in returnable plastic bottles. Invoices can be provided if necessary. This is available to

		<p>amended by L.N. 242 of 2009 (Reference – document 14, page 46, Water consumption, findings, recommendations)</p> <p>In addition, if any water proposed to be used as potable water for human consumption is treated on site, this should also be registered with the Health Authority as per Registration of Private Water Supplies Intended for Human Consumption Regulations, 2004-L.N. 357 of 2004.</p> <p>Kindly indicate whether the Energy Audit Report was prepared by a registered Energy Auditor who has completed the course Energy Performance Rating of Dwellings Malta as identified in the list on the following link:  <a href="https://secure2.gov.mt/EPC/information-assessors?l=1">https://secure2.gov.mt/EPC/information-assessors?l=1</a></p>	<p>employees through water dispensers in 4 different locations on-site (each floor of the admin building, garage and sorting shed) and all employees are informed that water from the taps is not of drinking quality. This is further confirmed by stickers attached above each sink /tap on the premises.</p> <p>Not applicable.  (Since Section 2.5.1 in the application deals with Energy kindly let me know whether you wish me to insert this info into section 2.6 (Water) or 2.2 (Raw Materials)</p> <p>The energy audit report was carried out in 2009 by Sabine Sausmekat. She was one of the auditors selected by Malta Enterprise to perform Energy Audits. At the time Malta Enterprise were running a scheme to assist small enterprises in carrying out such audits and suitably qualified auditors were selected based on what was available at that time. The list above is a 2012 update and Sabine is not on it. I am not sure she even still is in this line of work and what kind of certification was required in 2009 so I have contacted her for clarification and this is her response:  I was approached by Malta Enterprise long before any qualifications came out, as they knew I was working for many years in responsible positions related to energy efficiency and environment, I was officially appointed through them and we were working on a curriculum to make sure that all auditors in the future would have the same level of qualifications.  Therefore Yes, I was a registered business advisor and energy auditor with ME, the course came out after I left.  Her email together with her letter of appointment from Malta Enterprise are available.</p>
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			The PV panels are now installed and up and running. We have been advised to wait for 1 year from their installation to repeat the audit in order to best reflect the impact of the system on the site's energy performance.
B2.5.2	✓	Noted.	
B2.6	✓	Noted.	
B 2.7	✗	<p>Noted. Kindly submit a spill emergency plan to include actions to be taken in case of spillages of waste/s and fuels.</p> <p>Kindly indicate whether the EMS Manual and Working Plan documents referred to in the Risk Assessment Summary (document 18) Ref. 2.7 include 'methodologies for dealing with the identification and minimisation of environmental and <b>public health risks and hazards</b> etc'. In simpler terms, please specify whether the document deals with public health issues or whether this needs to be updated accordingly.</p>	<p>A spill plan has been formalised. (Attached as a separate document)</p> <p>The EMS is a formalisation of the organisation's <b>environmental</b> policy and deals with risks and hazards only insofar as these are related to the environment. A list of environmental risks is included as Document 19.</p> <p>The Risk Assessment Table Document presented highlights one hundred and thirty six separate hazards and risks which could arise from every aspect of activities carried out on site and actions to be taken to minimise the risk of such incidents occurring.</p> <p>The working plan already includes, as one of its appendices, the Health and Safety Manual of the site in its entirety and has now also been updated to include the Spill Plan as another appendix.</p> <p>The major risk present on site with regard to health risks would be the event of a spill or a fire. These are covered in the fire plan (which is part of the Health and Safety Manual) and is now more formally covered in the Spill Plan (Attached).</p>
B2.8	✓	Noted. Training of employees on environmentally relevant matters shall be included as part of any IPPC permit issued.	

B2.9	✓	As per Article 22(2) of the Industrial Emissions Directive 2010/75/EU (IED), the permit will require the submission of a baseline report by the operator. This report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities.	
B2.10	✓	N/A	
B3.1.1	✖	<p>Kindly note that LN 337 of 2001 has been replaced with LN 184 of 2011 as amended by LN 441 of 2011.</p> <p>In view of the latest request for the inclusion of waste in dust form, kindly submit an updated list of EWC codes for the waste streams that are being proposed to be accepted, stored and processed on site.</p> <p>In addition, kindly specify the method of storage and containment for each waste stream (highlighting special storage conditions that might be applicable for specific waste streams).</p>	<p>The application document has been updated to reflect this.</p> <p>Kindly note that quoting section 19 of the site's current permit (pg 22 of 26) <i>"This facility is authorised to accept waste under all EWC codes of waste as published by Commission Decision 2000/532/EC as amended subsequently from time to time."</i> The current site permit already covers all EWC codes but includes 3 specific exemptions, the relevant one in this case being, quoting from Table 3 (pg 6 of 26) <i>"Waste consisting solely or mainly of dusts, powders or loose fibers"</i> There is therefore no specific list of codes to add as such but rather a request to remove the exemption so that such waste can be accepted on-site for storage in an appropriate containment system.</p> <p>A more detailed description has been prepared. This shall be included in Doc 24 ref 3.1.2 Measures for waste management storage and handling. (Attached as a separate document)</p>
B3.1.2	✓	Noted. With regards to sections 4.7 and 4.8 of the G.S. Rec Ltd. Working Plan it is to be noted that storage of waste prior to disposal cannot be kept for more than one year and more than three years if it is awaiting a recovery or treatment operation.	

B3.1.3	✓	Noted.	
B3.2	✗	<p>Kindly note that waste stored and handled on site may contain individual substances listed in list I and II of LN 203 of 2002. In this regard, applicant is to submit a certificate of leakproofness (impermeability) issued by the developer's architect and detailed design plans for the following structures:</p> <ul style="list-style-type: none"> <li>- Cesspit;</li> <li>- Storage sheds where hazardous wastes are being stored;</li> <li>- Reservoirs and direct links/channels</li> </ul>	<p>Upon making this request to architect we were referred to an Engineering firm for the carrying out of testing. The cesspit was serviced as part of the ongoing works on-site (finishing of hardstanding and levelling etc) and the spill channels and reservoirs were also serviced and tested. The engineer's report is available. (Attached as separate document)</p>
B3.3.1	✓	Noted.	
B3.3.2	✗	Cesspit should be duly registered with Superintendent of Public Health.	The cesspit has been duly registered. (Certificate attached as separate document)
B3.3.3	✓	Noted.	
B3.4	✓	Noted.	
B3.5	✓	Noted.	
B3.6	✓	Noted.	
B3.7	✓	Kindly note that an updated noise impact survey shall be required; which however may be conducted as part of the improvement programme for the IPPC permit. The terms of reference for the noise monitoring survey are attached as a separate annex (Annex II).	
B3.8	✓	Monitoring requirements may be set in any IPPC permit issued if these are deemed to be required.	
B3.9	✓	Noted.	
B4.1	✓	Noted.	
B4.2	✓	Noted.	
B5.1	✗	Kindly submit further details on the oil and sediment interceptor mentioned in point 4.2.7 of the EPS.	A separate document has been compiled.
B6.1	✓	Noted.	
B6.2	✓	Noted.	

B6.3	✓	Noted.	
B7.1	✓	Kindly note that LN 337 of 2001 has been replaced with LN 184 of 2011 as amended by LN 441 of 2011.	Section in application has been modified.
B8.1	✓	Noted.	
B9.1	✓	Noted.	
B9.2	✓	Noted.	
B9.3	✓	Noted.	
B10.1	✓	Noted.	
		- In the application there seems to be no reference to treatment processes such as dismantling of hazardous waste (WEEE), as well as de-gassing of equipment; kindly confirm whether such activities are currently being conducted on <b>site</b> ; if yes, please amend sections B1.2 and B2.3 of the application, to take into account such activities;	The required sections of the Master Doc of the application have been updated, as has B1 (activities).  Kindly note that <b>equipment which has not been degassed is NOT accepted</b> on-site.
		- Please also make necessary amendments/revisions to section 3.5 of the Working Plan - in particular, condition 3.5.5 states that 'waste is not treated on <b>site</b> as part of the waste separation and storage process';	Please note that section 3.5.5 of the workplan you refer to pertains to GreenSkip Services Ltd's Work Plan. WEEE waste is handled by G.S.Rec and covered by the G.S.Rec Environmental Permit (section 4.2.8). The methodology submitted to MEPA for the Permit Variation (in July 2011) has been incorporated into the G.S Rec work plan. Please advise if this is sufficient re this point.

Additional documents submitted:

Spill Plan (B2.7)

Specific Storage requirements of waste (B3.1.1)

Cesspit and Spill containment system leakproofness report (B3.2)

Cesspit Registration Certificate (B3.3.2)

Sediment Trap (B5.1)

Updated Master Document.