

## Annex II: IPPC Application review document

	Pg	Procedure or Area	MEPA feedback 20.08.2015	Operator's feedback 23.09.2015	MEPA feedback 12.11.2015	Green Skip Feedback 04.02.2016	MEPA Feedback 22.03.2016  Operator's Feedback (in red) 14.04.2016	ERA Feedback 19.09.2016	Green Skip Feedback 20/04/17	ERA Feedback June 2017	Greenskip feedback Aug 2017  Greenskip feedback October 2017
1	Various	Various	A number of EWC codes ending in '99' were included in the document. The Authority will include these codes ending in '99' in the IPPC permit, however the operator will be required to obtain pre-authorization for each consignment of waste received under such codes by submitted a justification as to why the waste being received falls under these codes and providing a brief 'method statement' as to the storage/processing envisaged for this waste (making reference to the identified procedures applied for through the 'EWC Code list and Procedures' documents submitted in this IPPC application.	The entry of the '99 codes is a measure in case none of the other codes will describe the waste material, since the '99 is generally more generic. However this will not be the norm but the exception. In this case a preauthorization will be requested.	Noted. A condition will be included in the permit to this effect	Ok					
2	Pg 3	Various	The site layout plan has been noted, and as part of the Improvement Programme in the IPPC permit, it will be made a requirement that visible delineation and signage for all of the identified areas will need to be implemented.	Agreed.							
3	Pg 3 and through out EWC List	Waste Reception/ Area 9	Although in the site layout plan, Area 9 is indicated as being a 'quarantine area', in the EWC List, reference is made to this area on several occasions as being the storage area for various non-hazardous wastes. A quarantine area should be designated to cater only for temporary storage of wastes which have been received at the site in error which are not permitted, prior to removal from site. This quarantine area should be bunded and protected from the elements.  An updated site layout plan is to be submitted, with a separate quarantine area fulfilling the	The quarantine area has been previously discussed during other site visits. This area is meant to hold ONLY contained solid waste in wheeled bins. These bins would be waiting in queue to be taken into the shed where these will be emptied. There is no requirement for bunding as there are no spillages, there being only solid recyclables, such as cardboard, plastics and metals. These will be separated and processed in the shed. On the other hand, hazardous waste is transferred directly to the	The EWC list shows various other wastes besides solid recyclables which are indicated as being stored in Area 9, including wastes including but not limited to various types of sludges and waste paints, waste ink, blasting material, end of life vehicles, dredging spoil, and digestate from anaerobic treatment of municipal waste.  The quarantine area is a basic requirement implemented in all permitted waste management facilities,	Done. The hazardous waste will all be directed immediately to the packaging area (16) or to the storage area (13.14.15) as the case may be. Quarantine area (9) is only used for materials awaiting to be tipped in the shed for sorting and processing.	The quarantine area designated for unpermitted waste potentially entering the site will be made a requirement in the Improvement Programme of the permit.  Noted	Applicant is to immediately indicate the extent of such an area and provide its delineation on an updated layout plan. This is to be accompanied with proposals and time-frames for adequate containment of effluents and details as to how all waste stored therein shall be protected from the elements.	The area is already marked and notices are in place indicating 'quarantine'. However it is ONLY NON hazardous and fully contained solid waste awaiting sorting in the shed or in very limited quantities mixed waste awaiting to be emptied in compactor vehicle, that is placed there. This waste is contained in 1100 ltr bins that are fully enclosed. Waste resting here is generated by industry and is mostly packaging waste. No effluents are generated and no liquids are placed there, therefore	Whilst noting that the described process refers to waste which shall be processed by the facility, ERA notes that the scope of the quarantine area is to temporarily store waste which the operator is not authorised to handle and will be disposed of at an alternative authorised facility. The outline boundary of such an area is to be shown on an updated layout plan together with details of how it shall be kept covered at all times.	The quarantine area was never Intended for waste that should not have Entered the facility, but for non hazardous waste awaiting processing in the shed or mixed waste unsuitable for recovery. Unauthorised waste will ENTER THE FACILITY . DRIVERS are TRAINED NOT TO COLLECT SUCH WASTE. Waste in this area is always contained so Therefore there is already a cover.

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			abovementioned requirements. The storage of various non-hazardous wastes should be indicated and labelled as such.	hazardous waste shed for storage / processing and is not stored in Area 9.  It is to be noted that material received at the facility is visually inspected by the driver prior to loading into the van; this ensures that the waste received is as expected.	without exception, since even the most rigorous checks will not necessarily manage to catch all unpermitted wastes prior to entry on site.  Please update the site plan as per MEPA's comments dated 20.08.2015.				no containment is necessary		
4	Pg 5	Procedure 1	In Procedure 1, it is stated that "this process also produces rejects", which are "separated from the rest at the initial stages and sent for landfilling".  Kindly provide further details on the estimated annual quantity of rejects produced during this process (e.g. based on the quantity of rejects produced in the previous year), and further information on the storage of this prior to landfilling.	The reject rate is estimated at 25-30%; based on 2014 figures this is estimated at around 400 tonnes annually.  Rejects are taken directly from the shed (in area 8) to the Ghallis non-hazardous landfill on a daily basis.	Noted.						
5	Pg 6	Procedure 4	Reference is made to a heavy-duty shredder, which is used for processing of a number of wastes, some of which may be prone to causing some airborne contamination during shredding (e.g. packaging with powdery substances, lightweight materials such as mattress foam, etc).  While some measures are taken to avoid such emissions during shredding, further measures will be required as part of the Improvement Programme of the IPPC permit.	While understanding the preoccupation of possible airborne particles, one of the measures taken is the shading cover overhead which act as a barrier. Another measure is the avoidance of shredding on very windy days. As an extra measure we shall fit the shredder with a cover for the smaller powdery material. These are however captured directly in a bag or container. Previous air monitoring by Wasteserv from the Green Skip roof have not resulted in high levels of airborne particles. All employees wear the necessary PPE during shredding. Perhaps	Measures beyond these suggested will be required. Please see Waste Treatment Industries BREF on BAT for shredding equipment emission control.	A curtain shall be fixed to the outer lower part of the shredder. This will contain any flying shredded parts and direct them to the container underneath the shredder. Wetting will settle any dust.	This shall be implemented as soon as possible in order for the Authority to determine its suitability prior to issue of the IPPC permit.  In process	This must be installed prior to issue of IPPC permit. Should this not be deemed suitable, further measures will be required in the Improvement Programme.	done	Noted.	

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				the largest polluter is the landfill itself and nearby farms and traffic as well as the building of the Coast Road.							
6	Pg 6	Procedure 4a	The operator has yet to apply for the processing of mulching to obtain end-of-waste status. The operator is to submit an application for this as soon as possible.	Application to be sent.	It is expected that a copy of the acknowledgement pertaining to submission of this application is included with the next replies to this review.		To date this application for end-of waste for mulching has not been submitted. Kindly submit at your earliest.  Being prepared	Noted. This must be submitted immediately .	We have stopped this process as it is no longer economically feasible. Once this is again feasible we shall apply for the EOW for wood	Noted. Waste Management Procedures document to be updated accordingly.	
7	Pgs 6, 8, 9 11, 25	Procedures 4, 4d(ii), 4h(iv), 10d(i)	In several procedures, where liquid waste is received in packaging which could potentially be recycled if cleaned, reference is made to washing of packaging in order to send for recycling.  Please provide further information on where this packaging is washed and subsequent wash waters are collected.	As mentioned in the document, GreenSkips will not wash contaminated packaging but will export it as hazardous material. On occasion, clients wash the packaging themselves and provide the clean packaging and wash water (in containers); whereby the latter is exported. Thus no washing takes place on site.	In procedures 4, 4d(ii), and 4h(iv), it is stated that the packaging from the liquid wastes will be recovered where possible. Since you are stating that no washing will take place, it is being assumed that these will be sent for recovery without washing off of residues. Kindly confirm.  Furthermore, Procedure 10d (i) states "Once empty the damaged container is cleaned (if that is possible) and resulting wastewater treated as hazardous waste" in which case subsequently the packaging would be re-used. Please elaborate as to where the container is washed and subsequent washwaters collected.	Confirmed  Only IBCs are rarely cleaned and this for reuse purpose only. The water is emptied via the tap fitted on the IBC itself, directly into another IBC or drum. There is no spillage, but as a precaution a Spillpallet is used, which spillpallet will be full of absorbent material. Generally this operation is rarely done .		Noted.			

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8	Pg 8	Procedure 4d(ii)	The title of this procedure has been given as "Liquid Food". However, throughout the EWC List document, this procedure is referenced in terms of processing of various other non-hazardous liquid wastes. Therefore, it is being suggested that this procedure is re-named to reflect all wastes being treated in this manner (e.g. Non-hazardous packaged liquids)	Agreed and amended.	Noted.						
9	Pgs 9, 6	Procedure 4 & 4d(ii)	With regards to treatment of non-hazardous liquid wastes, it is stated that liquid wastes are neutralized to the correct pH in mobile containers.  Kindly provide further information on this neutralization process including details on how this is carried out and what is used in the neutralization process.	After testing the material with pH meter, (so far only acidic material has been neutralized) the amount of neutralizing agent is calculated. The material used for neutralisation is sodium hydroxide (NaOH) known as caustic soda. This process is done by a chemist, by simply dissolving, adding and mixing the material until the required pH is reached. If an alkaline solution needs to be neutralized, acid can be used instead (hydrochloric acid); however, to date no alkaline materials have been received by the facility for neutralization as most such materials (e.g. expired juices, wine, etc.) are	Noted.						

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				acidic.							
10	Pg 9	Procedure 4d(iii)	<p>It is stated that Animal By-Products will only enter GSS in exceptional circumstances, e.g. in case of transport breakdown.</p> <p>The Authority fails to see the reason why such material would need to be brought on site, including the circumstances provided as an example. Therefore the waste codes related to this material will not be permitted in the IPPC permit.</p>	<p>Animal by Products that may enter our facility would only be derived from supermarkets but not from farms. As already indicated these materials are taken directly to the incinerator. It is only in extreme circumstances that these may enter the GSS facility, only when there is no other possible option. These circumstances may include emergency collection of meats from broken down freezers in restaurants on Sundays or public holidays. However, as a rule, collections are deferred until the material can be taken directly to the incinerator.</p>	<p>Whilst the circumstances cited have been noted, in order for such temporary storage to be considered on site, even in rare circumstances, GSS would need to install an industrial fridge/freezer on site to cope with such instances.</p> <p>Should the above option be implemented, the EWC codes in question will be re-introduced into the permit.</p>	EWC codes removed					
11	Pg 10	Procedure 4h(i)	<p>This procedure references 'destruction' of WEEE including shredding. Further reference to submission of works method statement on a case-by-case basis as arising for approval to the Authority is made as an envisaged way forward.</p> <p>Please note that any dismantling methods for WEEE must be submitted and approved by MEPA in this document, for consideration in the IPPC permit. In order for such additional methods for individual WEEE types to be considered at a later stage following permit issue, a formal variation application will be required. Please be guided accordingly.</p>	<p>Noted and agreed.</p> <p>The detailed procedure for WEEE processing is already included in procedure 7.</p>							
12	Pg 11	Procedure 4h(v)	As in the case of counterfeit/confiscated hazardous	GSS will not shred hazardous medicines;	Kindly be informed that inclusion of additional	noted					

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			<p>waste items, any dismantling/destruction methods for various hazardous wastes must be submitted and approved by MEPA in this document, for consideration in the IPPC permit. This includes more detail on destruction of medicines and mitigation of any emissions from shredding of such medicines.</p> <p>In order for additional methods of treatment/dismantling/destruction of individual types of hazardous wastes to be considered at a later stage following permit issue, a formal variation application will be required. Please be guided accordingly.</p>	these will go directly to export for incineration. Procedure 4h(v) has been updated in this regard. Should any local destruction be required, we shall produce a Method Statement for approval to MEPA.	activities would require a variation to permit.						
13	Pg 11	Procedure 4j	<p>It is stated that shredded rubber including shredded tyres may be sent to landfill should these be accepted by Wasteserv.</p> <p>Kindly be informed that the current operational engineered landfills (Ta' Zwejra and Ghallis Landfills) cannot accept shredded tyres. Please be guided accordingly.</p>	Rubber is sent to other authorized facilities. Presently no tyre shredding takes place, however GSS is very aware that rubber is not to be sent to landfill, but this material is sent to a third party facility where it will be exported for recycling. Procedure 4j and the EWC list (codes 16 01 03 and 19 12 04) have been clarified.	Noted.						
14	Pg 12	Procedure 4l	A full step-by-step method statement will be required for the dismantling procedure being proposed for ELVs. Please update procedure document accordingly. Further to this, an additional layout plan of the garage, showing the location of the equipment to be used, and all temporary waste storage during processing including the location and maximum amount of vehicles to be stored within the garage prior to processing.	As mentioned, for the time being the facility only proposes to accept non-hazardous end-of-life vehicles that have already been depolluted. The procedure is a very simple one involving manual dismantling, segregation, followed by cutting and shredding of the metal frame. Normal mechanical tools will be used for this purpose; no specialised equipment / depollution rig is required. Not more than	A more detailed step by step methodology of the dismantling process will be required; as well as an updated layout plan specifically for the garage to include this activity.	EWC for ELVs have been removed					

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			Furthermore, should this activity be permitted, please note that in the IPPC permit with require that any depolluted vehicles accepted on site can only be received from authorized ELV depollution facilities.	one depolluted vehicle will be accepted for processing at any time; therefore no more than one vehicle will be stored within the garage at any time.  Noted.							
15	Pg 13	Procedure 5a & 5b	Procedure has been noted. However, should any odour issues arising from this practice occur, please be informed that the Authority may require implementation of further odour abatement and/or alternative technologies	Noted.				Proposed procedure is not being considered to satisfy the BAT conclusions (Ref. 45). Operator is to propose a system of how handling of odorous materials shall take place “ in fully enclosed or suitably abated vessels and storing them in enclosed buildings connected to abatement”. This shall include suggested time-frames of implementation of this requirement.	The process cannot afford any financial implications at present. This area is used solely by the Water Services Corporation. We are doing this activity only as a social and national service. In case we will stop it completely. There is no other facility or any other place where this material can be placed. We have altered the area to have more control over the running effluent. In case we will close it down. We envisage dumping in all areas as this cannot be taken to landfill as is. Generally there is no smell at all or hardly, there are more smells being emanated from the farms next door than from our site.	Discussions with Water Services Corporation are under way. ERA will include further requirements as conditions in the IPPC permit	
16	Pg 14	Procedure 5b & throughout EWC Code List Document	Procedure has been noted. However, kindly be advised that the IPPC permit will be excluding any drying of any sludges containing solvents, including those classified as non-hazardous. Please be guided accordingly.	Noted. This procedure is not intended for drying of any sludges containing solvents or hazardous materials.				Above comment refers.	Above comment refers	Noted. Above comment refers.	
17	Pg 15, 16, 17, 19 20	Procedure 7 (and all sub-procedures )	As advised in previous points in this table, please note that any dismantling methods for WEEE must be submitted and approved by MEPA in this document, for	Already submitted – please refer to procedure 7 and related sub-procedures.	It is being requested that a comprehensive list of the actual WEEE falling under the various categories (including the 'General'	GSS feels that it is not economically viable to restrict itself as to what WEEE it can receive at its	In order for the Authority to be in a position to properly assess and permit WEEE	For the final version of the waste procedures document, kindly remove reference to	noted		



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			<p>consideration in the IPPC permit. In order for any additional methods for individual WEEE types to be considered at a later stage following permit issue, a formal variation application will be required. Please be guided accordingly.</p> <p>Furthermore, currently all WEEE waste being accepted at permitted facilities must be considered as hazardous prior to treatment applied. Therefore, the code 16 02 14 will not be included in the permit. Any wastes being accepted under 16 02 16 must originate from other authorized WEEE dismantling facilities.</p> <p>Further to the above, please ensure that all proposed methodologies for storage, handling and treatment of WEEE comply with Schedules 7 and 8 of L.N. 204 of 2014.</p>	<p>Noted. All WEEE entering the facility will be classified as hazardous. After dismantling, the non-hazardous WEEE components will be classified as 16 02 16. EWC code 16 02 14 has been removed from the list of waste codes accepted by the facility; however code 16 02 16 must remain as it is one of the wastes that will be generated by the facility and may also be accepted from other authorized facilities, e.g. for combined shipment..</p> <p>Noted. The facility will be compliant to LN 204 of 2014.</p>	category 7a) is submitted.	<p>facility. GSS will no doubt take great care in dismantling all ten categories of WEEE in the right manner. The resulting material will be directed for export/recycling. GSS will also consider exporting the WEEE as is, without doing any processes at all.</p>	<p>dismantling operations, an actual list of WEEE and the processing intended needs to be supplied. Indicative lists of such WEEE types may be obtained from Schedules 2, 3 and 4 of L.N. 204 of 2014.</p> <p>Should the above not be provided, the processing of WEEE will not be included in the IPPC permit.</p> <p>Procedure list adjusted to include the methodologies as requested.</p>	<p>the fluorescent crushing machine since it is no longer relevant to the IPPC permit. Should Greenskips wish to include this at a later date, this will need to be submitted as a methodology document and would require a variation to permit.</p>			
18	Pg 16	Procedure 7b	<p>The appliances listed as containing CFCs and HFCs does not include water heaters (geysers). Please note that these items may contain such CFCs/HFCs in their foam and therefore must be classified accordingly.</p> <p>It is also stated that clients will be asked to depollute the appliance prior to acceptance on site. Please note that the IPPC permit will require that any CFC/HFC containing appliances must be received from an authorized waste management facility permitted for such degassing.</p>	<p>Agreed; procedure 7b has been updated.</p> <p>As mentioned, WEEE containing CFCs and HFCs are degassed by the generator themselves who have the trained technicians and the depollution apparatus to remove CFCs and HFCs, therefore degassing all the equipment prior to delivering it to GSS facility.</p>				<p>A condition requiring that waste which has already started to be processed (e.g. through degassing) is only accepted from authorised waste management facilities will be included in the permit.</p>	noted		



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			<p>Further to this, the IPPC permit will exclude acceptance of bulky waste from domestic sources including Local Council bulky collections due to the abovementioned requirement.</p> <p>In the final paragraph of this procedure, it is mentioned that in future, "GSS may also consider installing degassing equipment". Please note that this will require a variation to the IPPC permit along with further information of the fate of those appliances falling under this category containing compressor oils – will the oils be emptied on site, how this will take place, storage of these oils, etc.</p> <p>Also, please ensure that all proposed methodologies for storage, handling and treatment of WEEE comply with Schedules 7 and 8 of L.N. 204 of 2014.</p>	<p>GSS disagrees with this approach. We would like to offer a service to WEEE Compliance Schemes. It is proposed that WEEE collected from Local Council bulky collections is received by GSS; any WEEE containing CFCs and HFCs will not be degassed on site, but will be taken to a third-party authorized facility (typically exported) for degassing.</p> <p>Noted. However, at the moment it is more economically feasible and environmentally beneficial (due to the low volumes generated locally) to export CFC/HFC-containing equipment as they are, rather than to degas them on site. The option for direct export is currently being given priority by GSS.</p> <p>Noted. The facility will be compliant to LN 204 of 2014.</p>							
19	Pg 16	Procedure 7c	Further to the provided procedure, GSS is to provide a contingency methodology to be followed in case of breakages which may occur in transit or during handling on site.	Neon tubes and bulbs are typically transported in specialized boxes or in enclosed wooden or other cardboard boxes to WasteServ; WasteServ does not impose any specific containment in the event of breakages.	A contingency plan for breakages will still be required. Please submit accordingly.	The boxes are specifically manufactured to cater for the eventuality of any breakages. The neon tubes are in separate slots within the box itself and not even touching each other. The boxes are secure	The contingency plan will be made a requirement in the Improvement Programme of the IPPC permit.  The boxes we use are specifically manufactured for the carriage of neon tubes. They are specifically intended to contain any breakages should	Proposed storage arrangements are being noted. Time-frames for the submission of a contingency plan in case of accidental spills or breakages are to be provided.	noted	The improvement plan of the permit will require the operator to submit a contingency plan with time-frames in case of accidental spills or breakages.	The boxes themselves are manufactured in a way to contain any breakages. care will be taken to handle them in the best way possible. GSS will transport this material only in enclosed boxes or containers. In case of breakages The box shall be 'OVERPACKED' (another larger box to contain the Present packaging in its entirety) In order to eliminate any spillages of fine glass'  Refer to Procedures. Amended

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							this happen, however the tubes are separately packaged and are not even touching each other. However should they break they will still remain contained in the THICK cardboard box.				
20	Pg 17	Procedure 7c	<p>With regard to the potential consideration of installing a fluorescent tube crushing machine onsite, please be informed that this may be subject to a variation, which would require evaluation of potential emissions, the method of packaging, requirement for its own dedicated operational space and application for end-of-waste status for the crushed glass.</p> <p>Reference to details of methods and equipment for crushing being considered for potential future inclusion should be removed in the updated Waste Procedure Document.</p>	<p>A description of the machinery and the methodology to be adopted is included in the Waste Management Procedures document; the equipment product sheet has already been included as well. GSS will see to it that manufacturer's operating instructions are followed closely during operation.</p> <p>As mentioned, the crushed material will not reach its end of waste as a glass material but will be exported as a hazardous material.</p> <p>The only reason for crushing the neon tubes is for more efficient export and volume reduction, therefore loading a heavier load. The crushing of neon tubes and bulbs will also reduce the storage space required to a fraction.</p> <p>This activity would occur in area 11, which is furthest away from sensitive receptors.</p>	<p>More detailed specifications of the equipment should be provided. Information on how the crushed material will be packed, and whether this equipment is CE certified will be required. A baseline mercury monitoring programme will be required, as well as a proposed monitoring strategy for the equipment once operational.</p>		<p>In view of no further information being received, the request for fluorescent tube crushing machine will not be included in the IPPC permit.</p> <p>We are putting it on hold for the time being.</p>	<p>For the final version of the waste procedures document, kindly remove reference to the fluorescent crushing machine since it is no longer relevant to the IPPC permit. Should Greenships wish to include this at a later date, this will need to be submitted as a methodology document and would require a variation to permit.</p>	noted		

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21	Pg 19	Procedure 7d	Further to the provided procedure, GSS is to provide a contingency methodology to be followed in case of breakages of CRTs which may occur in transit or during handling on site.	Great care is taken in the handling of CRTs . In case of a breakage the CRT and all broken pieces are placed in a closed drum and treated as regular CRTs (hazardous material).	Noted.						
22	Pg 19	Procedure 7e & in EWC list Document for codes 16 06 01 – 16 06 05	Batteries are being included under the procedure for 'Small WEEE". It is being suggested that a separate procedure is provided for acceptance of batteries falling under code 16 06 01 to 16 06 05.	A new procedure has been created (7h) as requested to cover EWC codes 16 06 01 to 16 06 05, 20 01 33 and 20 01 34.  (The procedure formerly labelled as 7h is now procedure 7i).	Noted. Please note that conditions related to batteries storage will require that these are keep either indoors or in closed, leak-proof containers.						
23	Pg 20	Procedure 7h	Procedure has been noted. Please note that in the IPPC permit it will be required that acceptance of any such WEEE should be declared to the Authority and double containment for such items is to be provided during storage.	Noted. Double-bagging or "overpacking" will be implemented for asbestos-containing waste. Procedure 7i has been clarified.	Noted. – double-bagging or overpacking will be required for WEEE containing PCBs as well.						
24	Pg 21	Procedure 8a & EWC Codes List Document	It is stated that Clinical Waste will only enter GSS in exceptional circumstances, e.g. in case of transport breakdown.  The Authority fails to see the reason why such material would need to be brought on site, including the circumstances provided as an example. Therefore the waste codes related to this material will not be permitted in the IPPC permit.	As already indicated Clinical waste WILL NOT enter the facility except in case of vehicle breakdown, which breakdown would have impeded GSS from proceeding directly to the incinerator and therefore missed the disposal slot at the MTF. It is not in GSS' interest to keep Clinical waste on site. This will obviously not relate to the cytotoxic wastes from hospital, since export is the only option possible.	Whilst the circumstances cited have been noted, in order for such temporary storage to be considered on site, even in rare circumstances, GSS would need to install an industrial fridge/freezer on site to cope with such instances, and provide a handling procedure to this effect.  Should the above option be implemented, the EWC codes in question will be re-introduced into the permit.	EWC codes for clinical waste have been removed					
	Pg 21	Procedure 8b	Kindly clarify the rationale behind monitoring cytotoxic waste for radioactivity using a Geiger monitor when this is not classified as radioactive waste	As a precaution and checking, a check used also by other foreign facilities.	Noted. Please be informed that there is no radiological reason for cytotoxic waste to be any more radioactive than other waste produced from a hospital; however this is at the discretion of						

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	Pg22	Procedure 9	<p>Kindly indicate what level of activity of smoke detector is accepted at the facility; and whether detectors accepted at the facility are domestic or industrial in nature.</p> <p>Furthermore, kindly provide further information on whether the Geiger instrument used is fit for purpose and regularly calibrated. Furthermore, details of the exact monitoring procedure and the procedure followed in the case that radioactivity is detected should be provided.</p> <p>With regards to waste determined to be Class 7, kindly indicate what the 'provisions' taken are in this regard, as indicated in this section.</p> <p>Kindly provide further information on what measures are taken to ensure there is no contamination from potentially damaged detectors.</p> <p>Regarding packaging, please confirm what activities of radioactive material are being packaged and what notifications are made to the Radiation Protection Board in terms of L.N. 44 of 2003.</p> <p>In view of the acceptance of radioactive material on site, it is being recommended that advice is sought from a qualified expert as per Regulation 30 of L.N. 44 of 2003.</p>	No Class 7 waste has ever entered GSS facility. Should there be a need for such a waste to enter the facility, MEPA and the Radiation Protection Board will be contacted and details will be provided as required.	<p>Please submit requested information on the hand held radiation monitoring instrument, monitoring procedure (including calibration measures) and actions to be taken in case radioactivity is detected.</p> <p>Furthermore, submission of requested information on measures are taken to ensure there is no contamination from potentially damaged detectors and confirmation as to what activities of radioactive material are being packaged and what notifications are made to the Radiation Protection Board in terms of L.N. 44 of 2003</p> <p>The operator is being strongly encouraged to seek advice from a qualified expert regarding the above.</p>	The Geiger monitor is used ONLY to check the cytotoxic waste from the Anthony Mano oncology hospital, upon entry at GSS facility. This is ONLY as a precaution for the health and Safety of the employees. Should any radioactivity be detected the material will be isolated at a far corner of the site and the Radiation Unit contacted immediately for advice. Should the Geiger require calibration, it shall be taken to the importer.	Please see Annex to this review with direct comments from Regualtory Consultee (Radiation Protection Board)	Following direct discussion between RPB and Greenskips Ltd, this matter has been resolved through inclusion of permit conditions drafted by the Radiation Protection Board.			
25	Pg 25	Areas 13-16/ Procedure	Whilst it was shown that there are designated areas for storage/repackaging of hazardous	We do not agree with this. Great caution is taken to ensure that no spillages	Whilst acknowledging the measures being taken, the infrastructural standards in	We shall make use of an extra 5cm high versatile circle	Further information to support this	This item has not yet been addressed to the satisfaction of	The hazardous waste storage areas 'bins' shall have a 4 cm extra bund 1	Noted. An updated site drainage plan in line with that approved by the Planning	Presented by the architect as part of The planning permission . Please refer To docs 6A1, 6A2 and 6A3 presented

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		10 d(i)	wastes, and the presence of a channel in front of these areas to mitigate spills occurring within these areas; it was concluded that further measures would be needed.  Therefore, as part of the Improvement Programme in the IPPC permit, further bunding in the form of a ramp/bump several inches high made of impermeable material will be required, in order to improve the containment of the areas where hazardous wastes are being handled/repackaged.	occur when repackaging is taking place. Spill material is spread on the ground prior to start of work to immediately contain any small spillages. The material used is a highly absorbent one, therefore we do not see the use of further bunding as the channel and the reservoirs are more than adequate to contain any spillage that may occur. The site manager and labourers are also ADR trained and trained in the handling of hazardous material. No negligence is permitted and there is always more than one person on the job, so that if any spillages occur, the response will be fast and accurate.	place at this time are not considered to be adequate.  In this regard the works required will be imposed within a reasonable timeframe to be determined with the operator.	bunding whilst repackaging. Absorbent material will be kept at hand.	proposal is being requested. Submission of a diagram/photos of the placement of this in the designated area, as well as relevant bunding specifications are to be provided.  the Authority. Specifications/ schematics and photos of the bunding are to be submitted as soon as possible. Operator is to ensure that such a proposal is acceptable by the Planning Authority.  Furthermore, applicant is to submit details on how any potentially contaminated effluent from the quarantine and vehicle maintenance area shall not be directed to the rainwater culvert but adequately contained. This is to include details of how any oil-water interceptors shall be designed in accordance to "MSA EN 858 - Separator systems for light liquids (e.g. oil and petrol). Principles of product design, performance and testing, marking and quality control." The final discharge point of such separators and interceptors are to be indicated.  Applicant is to propose time-frame by when the above	mtr away from the entrance and the running channel as extra bunding. The metal cover shall remain in place covering the gutter to avoid any rain water entering.  Photos have already been submitted but are again being included . Presently the storage area is being completed with mortar and sealing of walls. All the roofs have been semi covered with plastic corrugated sheeting, which is placed over a raised metal structure, as indicated for hazardous waste storage. The BUNDING can be used where necessary and it is envisaged that there will be a stock of this material for such eventualities. The drain holes have all been cleaned and a filter plus an oil water separator are being installed. The reservoir has been cleaned and the project includes all the upgrading of the area, This is all being done now and we have engaged a project manager from a third party company to supervise all the works.	Authority shall need to be submitted as part of the consolidated version of the IPPC application.  The updated plan shall indicate how any potentially contaminated effluent from the vehicle maintenance area shall not be directed to the rainwater culvert but adequately contained for separate disposal or passed through an appropriately sized oil-water interceptor.	With the full document.	

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								arrangements shall be installed. This is to include the complete enclosure of any openings currently present within the roofs of the hazardous waste storage areas as described in inspection report dated 13 <sup>th</sup> June 2016.			
26	Pg 26	Procedure 10d(ii) & in sections of EWC Codes List Document	In the EWC Codes List Document, various ash & powder wastes are considered under this procedure as 'solid' waste.  A separate procedure for ash/powder/dust and other small particle waste which is easily made airborne should be submitted. Please update documents accordingly.	Procedure 10d(ii) (last bullet point) has been clarified. This material would not be repacked on site but will arrive at facility already packaged and sealed. If there is a circumstance where repackaging is required, it will be 'overpacked'.	Noted.						
27	Pg 30	Procedure 13	The described re-use of waste also entails 'preparation for re-use' of said waste. It is being brought to the operator's attention that any item received on site arriving as waste as an input but eventually being reused on site must be reported as part of the Annual Environment Report (AER) and will be made a requirement in the permit.	Agreed.							Amended to reflect possible imports of hazardous waste
28	Various	Various						Kindly be informed that through consultation on PA 3357/16 ERA has requested submission of the following information: 1. The proposed location of a	Weighbridge is being bought and shall be installed as soon as PA permit is approved. Funding has been allocated. Please refer to plans submitted by architect.  Information about diesel storage is being attached (Tuffa Tank) . As an extra	Noted. Following the issue of the IPPC permit, all bulk storage of fuel will need to be certified by an independent warranted architect/engineer in accordance with the following condition:  All bulk fuel storage tanks (including any built-in within generator sets) shall be provided with an adequately	noted

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								<p>suitably calibrated weighbridge.</p> <p>2. An indication of how all bulk fuel storage tanks (including any built-in within generator sets) shall be provided with an adequately designed bund system with an impermeable base and walls. The capacity of the bund shall be a minimum of 110% of the largest tank within the bund or 25% of the total capacity of all the tanks within the</p>	<p>protection the tank is enclosed in a a metal frame . The tank has its own bunding.</p> <p>A step 20 cms high has been built in the generator room . This will be rendered impermeable and it will serve as a bund in case of spillage. The generator itself has a tray for any small leaks should this happen. All of this is wwithin the existing project which is already underway. Time frame: 6-8 weeks</p>	<p>designed bund system with an impermeable base and walls. The capacity of the bund shall be a minimum of 110% of the largest tank within the bund or 25% of the total capacity of all the tanks within the bund, whichever is the greater. All filling and off-take points shall be located within the bund.</p> <p>When necessary all such fuel storage shall need to constructed and operated according to the requirements of the Regulator for Energy and Water Services.</p>	



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								<p>bund, whichever is the greater. All filling and off-take points shall be located within the bund.</p> <p>Submission of this information with relevant time-frames for implementation and any other information requested through this development permit application is required for the continuation of the IPPC process.</p>			
28	Various	various						<p>During the initial review of the IPPC application, the operator had been informed that a baseline report would be required as part of the IPPC permit. In view of the site history and recently issued European Guidance under the IED (attached), a baseline report for land and groundwater assessment is immediately required.</p>	<p>ENSURE consultants are dealing with this part</p>	<p>Method Statement dated May 2017 is being noted and the following feedback is being requested as an update to the submission.</p> <p>Page 19. (Paragraph 32): in view that various sludges are stored on site, operator is to provide any analytical results of such sludge and how it was determined to be non-hazardous. Information shall also be provided on the origin of any other materials (apart from the sewage sludge) which have been/are being processed in this area, their estimated annual quantities and disposal methods after drying.</p>	<p>This point is being answered in the Baseline report</p>

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										<p>Page 55 (paragraph 85, Table 7): Considering the current activities on site ERA recommends the relocation of the following sampling points (see attachment):</p> <ul style="list-style-type: none"><li>• Point Ref.: 1 to be moved to the area between the generator, cesspit and sludge pit in order to get a representation of any ground contamination generated by these activities.</li><li>• Point Ref.: 2 to be moved to the area of soil next to the maintenance pit since evidence of past spills was observed in the area together with other wastes still present</li></ul>	

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										<p>on site.</p> <ul style="list-style-type: none"> <li>The other 3 sampling points can be retained as are.</li> </ul> <p>Page 55. (paragraph 86): It is recommended that samples at a depth of 3m are also taken and stored and preserved (in chilled conditions), so as to allow for the possibility of testing of these samples without repeating the borehole drilling in the event that high levels of contamination are identified at 2m depth at any of the sampling points.</p> <p>Page 55. (paragraph 88): To note that drilling of any borehole must comply with the provisions of S.L. 423.32; drilling rigs must also be registered with the Competent Authority as per S.L. 545.06.</p> <p>Page 59. (Paragraph 95): Groundwater samples shall be subjected to pre-treatment and stabilisation operations in the field in order to ensure their chemical properties remain representative. Kindly provide details about such suggested stabilisation operations, especially for samples to be analysed for metals and organic contaminants.</p> <p>The baseline report shall be submitted as part of the consolidated version of the</p>	

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										IPPC application.	
29	Containment from yard							Applicant is to submit a proposal with time-frames showing how waste management activities carried out within the yard which have the potential to generate contaminated effluent shall also be surrounded by a gutter linked to a specific foul water reservoir. This is in view that most of rainwater precipitating on the site seems to be directed to one common underground reservoir.	Please refer to previous references to rainwater gutters and architects plans. The gutters in front of the hazardous waste storage 'bins are already impermeable and no rain water enters in them . In case of spills from inside the storage are an extra bund is now being placed. No hazardous waste will contaminate the reservoirs as no packaging if any takes place is done in close proximity of the rain water reservoir. Precautions are taken during such activities and bunding shall be available.	Noted. An updated site drainage plan in line with that approved by the Planning Authority shall need to be submitted as part of the consolidated version of the IPPC application	Presented as part of the Planning permit  Bunding shall be in place within 6 months

Annex 1: Comments on Procedure 9 by Radiation Protection Board

In terms of LN44 of 2003 any company that intends to handle radioactive material should seek the advice of a Qualified Expert.  
It is unclear from the replies given by the operator whether this advice has been sought

Pg22	Procedure 9	<p>Kindly indicate what level of activity of smoke detector is accepted at the facility; and whether detectors accepted at the facility are domestic or industrial in nature.</p> <p>Above question is un-answered.</p> <p>Furthermore, kindly provide further information on whether the Geiger instrument used is fit for purpose and regularly calibrated. Furthermore, details of the exact monitoring procedure and the procedure followed in the case that radioactivity is detected should be provided.</p> <p>Above question is un-answered. A “Geiger” instrument is not necessarily the best monitor for all applications.</p> <p>With regards to waste determined to be Class 7, kindly indicate what the ‘provisions’ taken are in this regard, as indicated in this section.</p> <p>Above question is un-answered.</p> <p>Kindly provide further information on what measures are taken to ensure there is no contamination from potentially damaged detectors.</p> <p>What exactly is the radiation unit? what is their expertise? Have they access to appropriate advice from a QE</p> <p>Regarding packaging, please confirm what activities of radioactive material are being packaged and what notifications are made to the Radiation Protection Board in terms of L.N. 44 of 2003.</p> <p>Above question is un-answered.</p> <p>In view of the acceptance of radioactive material</p>	<p>No Class 7 waste has ever entered GSS facility. Should there be a need for such a waste to enter the facility, MEPA and the Radiation Protection Board will be contacted and details will be provided as required.</p> <p>“Class 7” is a transport term Reference should be made to LN44/2003 for radioactive material that falls within the scope of Maltese regulations.</p> <p>(If a smoke detector is from a domestic application its activity <u>may</u> fall below Class 7, industrial smoke detectors may not.)</p>	<p>Please submit requested information on the hand held radiation monitoring instrument, monitoring procedure (including calibration measures) and actions to be taken in case radioactivity is detected.</p> <p>Above question is un-answered.</p> <p>Furthermore, submission of requested information on measures are taken to ensure there is no contamination from potentially damaged detectors and confirmation as to what activities of radioactive material are being packaged and what notifications are made to the Radiation Protection Board in terms of L.N. 44 of 2003</p> <p>Above question not fully answered</p>	<p>The Geiger monitor is used ONLY to check the cytotoxic waste from the Anthony Mano oncology hospital, upon entry at GSS facility. This is ONLY as a precaution for the health and Safety of the employees.</p> <p>There is no reason why cytotoxic waste would be more radioactive than any other clinical waste.</p> <p>Should any radioactivity be detected the material will be isolated at a far corner of the site and the Radiation Unit contacted immediately for advice.</p> <p>What exactly is the radiation unit? what is their expertise? Have they access to appropriate advice from a Qualified Expert</p>
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		<p>on site, it is being recommended that advice is sought from a qualified expert as per Regulation 30 of L.N. 44 of 2003.</p> <p>It is not clear whether the advice of a qualified expert has been sought</p> <p>The smoke detectors that we have so far been requested quotes for, but NEVER accepted so far were with:</p> <p><i>an amount of elemental americium-241 is small enough to be exempt from the regulations applied to larger sources. It includes about 37 <u>kBq</u> or 1 <u>µCi</u> of radioactive element <u>americium-241</u> (<sup>241</sup>Am), corresponding to about 0.3 µg of the isotope. <sup>[19][20]</sup> This provides sufficient ion current to detect smoke, while producing a very low level of radiation outside the device. (source – Wikipedia) . In such cases the authorisation and guidance of the Radiation Unit is sought. Other smoke detectors are not the ionisation type and are not radioactive.</i></p> <p>Please also note that some of the GSS drivers have undergone the ADR ( transport of Dangerous Goods) in Class 7 – Radioactive. A qualified DGSA ( Dangerous Goods Safety Advisor ) is also a member of GSS Management.. HOWEVER IF WE ARE REQUESTED TO OFFER THIS SERVICE WE WOULD FIRST CONTACT THE RADIATION UNIT FOR ADVICE&lt; PRIOR TO QUOTING.</p>		<p>The operator is being strongly encouraged to seek advice from a qualified expert regarding the above.</p> <p>It is not clear whether the advice of a qualified expert has been sought</p>	<p>Should the Geiger require calibration , it shall be taken to the importer.</p> <p>Any monitor used, needs to be calibrated.</p> <p>WE shall not be utilizing the Monitor and have in fact disposed of it.</p>
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