

# IP 0003/23 – Renewal of Ta' Żwejra landfill- Comments from ERA, Regulatory Consultation and Public Consultation

## Comments from Consultation

Consultee	Consultee Comment – December 2023	ERA Permitting Unit Comments – January 2024	Comments by WasteServ Malta Ltd	Consultee Comment – February 2024	Comments by WasteServ Malta Ltd March 2024
Occupational Health and Safety Authority (OHSA)	No feedback was provided.	Applicant to note conditions proposed by OHSA.	--	Occupation Health and Safety measures shall be mainstreamed in all phases of the project including the public procurement process as required by Cap 424 and subsidiary legislations.	WSM takes note of the comment by the OHSA.
Regulator for Energy and Water Services (REWS)	No objection from the Regulator for Energy and Water Services (REWS).	--	--	No further comments.	/
Water Services Corporation (WSC)	No feedback provided.	--	--	<ol style="list-style-type: none"> <li>1. Since a treatment plant will be installed to treat the leachate effluent, it would be prudent to construct a buffer tank to receive the treated effluent so in case of failure of the treatment plant there is a few day's storage capacity that will allow for this low quality effluent to be reprocessed.</li> <li>2. Given that WSM are contemplating discharge into sewer, an application for a public sewer discharge permit is a must. WSM have already expressed their intent for applying.</li> <li>3. Any treated effluent generated must be analysed at least quarterly for the following parameters:               <ol style="list-style-type: none"> <li>a. pH</li> <li>b. Total Suspended Solids</li> <li>c. Chloride</li> <li>d. Total Kjeldal Nitrogen</li> <li>e. Chemical Oxygen Demand</li> <li>f. Biological Oxygen Demand</li> <li>g. Fluoride</li> <li>h. Sulphate</li> <li>i. Total Phosphorus</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. All the necessary considerations are being taken.</li> <li>2. /</li> <li>3. WSM shall analyse parameters indicated in S.L. 545.08.</li> </ol>

				<ul style="list-style-type: none"> <li>j. Total Petroleum Hydrocarbons</li> <li>k. Arsenic</li> <li>l. Cadmium</li> <li>m. Chromium (III)</li> <li>n. Copper</li> <li>o. Nickel</li> <li>p. Lead</li> <li>q. Zinc</li> <li>r. Silver</li> <li>s. Cobalt</li> <li>t. Mercury</li> </ul> <p>4. WSC-DPU shall be kept appraised of the decisions taken by WSM in terms of the type of waste treatment technology selected and provide documentation confirming that this is the recommended BAT for the intended use.</p> <p>5. If an RO system will be used as part of the treatment process, the concentrated brine produced shall not be discharged to sewer and alternative disposal routes are to be sought and approval sought from relevant Authorities prior to such discharge/disposal.</p> <p>6. Can WSM confirm that this containerised plant will treat all leachate produced at the Ecohive complex or will this only be restricted to the site in question?</p>	<p>4. WSM, in its preparation for tender issuance is focusing on the quality of leachate and the quality of processed (out) effluent. With reference to the latter, this shall be compliant with the limits defined in S.L. 545.08.</p> <p>5. Noted.</p> <p>6. The proposed system shall treat leachate from both Ghallis and Zwejra landfills.</p>
Environmental Health Directorate (EHD)	<p>With reference to the request dated 20th November 2023 for any comments on the application regarding subject in caption, please be informed that this Directorate would like to submit the following comments / recommendations regarding this proposal:</p> <ol style="list-style-type: none"> <li>1. No waste, foul water and contaminated surface water is to exit the scheme.</li> <li>2. Mitigation measures to prevent odour pollution from the leachate treatment are to be carried out.</li> <li>3. The applicant is to identify any public health impacts which may arise if the project to maximise the landfill space is carried out.</li> </ol>	<p>Applicant to note suggested conditions and describe mitigation measures to prevent odour pollution from leachate collection and treatment.</p> <p>This application deals only with the renewal of Ta' Zwejra landfill as permitted in IP 0001/05/C.</p>	<p>WSM takes note of the recommendations listed in the first column.</p> <p>Leachate as per practice in previous years. A future leachate collection project shall be implemented in line with Improvement Programme Item 29.</p> <p>Regarding Point 3, at this stage this is a renewal of the permit. Any future project</p>	<p>No further comments / recommendations regarding this proposal.</p>	--

	<p>4. Pest control treatment must be carried out along the entire scheme since it is prone to rodent infestation.</p> <p>5. Moreover, any other 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 and mitigated by the applicant.</p> <p>6. Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.</p>		will be covered by a variation application.		
Energy and Water Agency (EWA)	The Energy and Water agency has no further comments regarding Ta' Zwejra landfill IPPC Renewal - IP 0003/23.	--	--	No feedback received.	--
Civil Protection Department (CPD)	No feedback was provided	--	--	<p>All proposals shall have the fire safety prepared and submitted by the entrusted fire safety engineer, competent in fire safety. The engineer shall also declare that the proposed project is compliant and adhering to the relevant fire safety standards and BS 9999. Declaration shall also clearly indicate that the access and facilities for the fire service is specifically fully adhering such standards.</p> <p>The compliance by the engineer shall be issued after the project is finalised, however before operating.</p> <p>Failing these conditions and requirements, the CPD objects.</p>	<p>WSM understands that BS9999 is applicable to building and/or dwellings, while this is a landfill operation (and the renewal covers the current operation). That said, the following measures are in place:</p> <ul style="list-style-type: none"> <li>- A classification of fire tiers is defined in the ERP, together with measures to apply in case of an emergency.</li> <li>- An Emergency Response Team (ERT) is in place. The ERT was trained by CPD.</li> <li>- Stockpile of inert is present close by, to be used to starve off small fires of oxygen. Heavy plant like compactors / bulldozers are available to either extract material on fire and to apply inert to extinguish burning material.</li> <li>- Water bowser is close by to be used to extinguish the fire. Water is available in WSM's reservoirs at ECOHIVE Complex.</li> <li>- WSM is currently refurbishing a fire engine to be deployed in case of an emergency.</li> <li>- Pumps utilised in leachate operations are ATEX rated and when serviced / maintained, these are sent to ATEX certified technicians.</li> <li>- WSM carries out landfill gas monitoring.</li> <li>- Works (e.g. confined spaces, hot works, etc.) are subject to permitting.</li> </ul>
Malta Resources Authority (MRA)	No comments from our end, in so far as MRA remit is concerned	--	--	No feedback received.	--

Planning Authority (PA)	With respect to subject in caption and feedback from the PA, kindly note that from a land use planning perspective the renewal of the IPPC permit of the Ta' Zwejra non-hazardous landfill shall not affect or prejudice permit PA 2342/06 (Sanctioning of extension to Zwejra Engineered landfill including the Closure Plan for the same Landfill) as well latest permits issued on site (PA 3447/14 – Construction of circulation road within landfills complex and PA 6753/17 - Erection of 1st floor (Class 4A, Offices) over existing Ground Floor). There are no further comments from the PA in this regard.	--	--	Wasteserv submitted no further comments on the PA's first consultation reply. In this regard the PA has no further additional comments to add.	--
ERA – Ambient Air Quality and Waste – Air Team	No comments or changes in conditions from an AQ perspective.	--	--	--	--
ERA – Ambient Air Quality and Waste – Noise Team	No comments.	--	--	No further comments.	--
ERA – Environmental Assessment Unit	In view that nothing has changed from the last permit renewal, EAU has no comments.	--	--	--	--
ERA - Biodiversity and Water Unit	No feedback provided	--	--	--	--
ERA – Compliance and Enforcement Unit	<p><b>Application documents:</b> There are no specific comments from a CEU perspective related to the documents provided in the link.</p> <p>In terms of <b>Improvement Programme</b> items:</p> <p>Items 29 &amp; 30 - Operator is reminded that ERA is still awaiting an updated proposal following the Authority's reply dated 02/11/2022 and the exercise which was stated to have been carried out by WSM in mid 2023.</p> <p>Item 31 - Permit holder is reminded to reply to ERA feedback on the 14/11/2023.</p> <p>Item 33 - As mentioned in the email reply sent to WSM on the 16 August 2023, WSM are to ensure that all future activities are covered by the relevant valid environmental permits. Should you apply for a variation to permit, please be reminded that this also impact IP 33 for the provision of a closure plan which is still outstanding, apart other expired IP items.</p>	<p>Improvement Program:</p> <p>Item 29 &amp; 30 – Kindly provide revised realistic timeframes for such proposal and implementation.</p> <p>Item 31 – Applicant to note CEU comment and proceed accordingly.</p> <p>Item 33 – Considering that this application only covers the renewal for Ta' Zwejra, a closure plan needs to be</p>	<p>Item 29 &amp; 30 – To refer to the one-pager on leachate treatment.</p> <p>Item 31 – WSM is currently working on the reply to ERA feedback.</p> <p>Item 33 – WSM is proposing that, considering a future project at the Zwejra landfill, this IP Item will be included in a future revision of the</p>	<p>Item 34 – Applicant to confirm that the RTO (PS2) is still operational and to be retained in the permit. Alternatively an updated site layout plan IP 0001/05/C/DOC2 is to be updated to mark the operational emission points with a legend describing each “PS” point.</p> <p>Based on the provided replies in terms of the landfill gas engines, kindly note that EMP is to be updated to consider monitoring of the following pollutants: NOx, CO, SOx, CO2, and TVOC will be required.</p> <p>Item 36a – Kindly provide a thermal monitoring proposal which refers to Ta' Zwejra landfill.</p>	<p>Item 34 RTO is still in operation.</p> <p>These parameters were monitored up to 2019. As per Chapter 5 of the EMP, monitoring of CHPs (landfill gas engine) was discontinued in 2019. As stated in Chapter 5 Clause 5.1 of the EMP, the CHP has a rated thermal input of less than the 1MW threshold above which S.L. 549.122 applies, hence as per ERA's feedback, monitoring was discontinued. Furthermore, CHP was bought and installed before 2018. These two facts exclude the CHP from monitoring. Therefore, as previous stated, WSM shall not be investing in consumables.</p> <p>Item 36a A thermal survey methodology was submitted to ERA on 27.05.2021.</p>

	<p>Item 34 – In view of WSMS update, operator is to apply for a variation to propose the removal of such a requirement from the permit accordingly.</p> <p>Item 35 – In view that this IP item is related to IP 33, please see action above.</p>	<p>submitted in accordance with Article 9(G) of S.L. 549.29.</p> <p>Item 34 - Applicant to provide the latest available emissions profile (not limited to pollutants in terms of MCP Directive) and conduct a risk assessment accordingly to determine environmentally acceptable pollution concentrations.</p> <p>Item 35 – Compliance with approved document in terms of pre-settlement levels is unrelated to submission of closure plan. Applicant to ensure compliance with permit conditions based on the information assessed in the previous application processes.</p>	<p>permit as an Improvement Programme item.</p> <p>Item 34 – With reference to the emissions profile from the RTO, please refer to AERs submitted to the Authority in past years. It is also to be noted that the requirements for existing combustion plants are mandatory from 2030 onwards.</p> <p>Through this entry, WSM considers this IP Item to be closed.</p> <p>Item 35 – Refer to reply to Item 33.</p>		
ERA – Ambient Air Quality and Waste – Waste Team	No comments.	--	--	No comments.	--

## Comments from Public Consultation

No comments were received from the public.