



FALZON
Group of Companies

WASTE OILS COMPANY LIMITED

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Environmental Permitting & Industry Unit
Environment & Resources Authority
Hexagon House
Spencer Hill, Marsa

Dear Mrs. Ellul,

As a part of our application for renewal of permit IP 0002/08/C issued on 25th June 2012, please find below an update on the implementation of items included in the Improvement Programme (Table 1.4.1 – items 1,2,7,13, 14,16, 17).

- Table 1.4.1 – reference 1: Completion of submissions related to the implementation of an Environmental Management System (EMS), as per conditions 1.3.1 to 1.3.3.

The EMS plan has been prepared in January 2012. Environmental Initial Review and Environmental Policy completed as per condition 1.3.1.
AER has been submitted to the competent authority every year since 2012 as per condition 1.3.3.

- Table 1.4.1 – reference 2: Submission of certification by a warranted architect or engineer showing that the catchment pits, pipes (including the pipeline leading to the quay), pumps, valves, flanges and oil interceptors on site are leak proof and in good operation. Submission of updated pipeline schematics.

The catchment pits, pipes, pumps, valves, flanges and oil interceptors were inspected and certified. All certificates have been submitted to the competent authority as per condition 1.4.1 of the permit.

- Table 1.4.1 – reference 7: Fitting of high-liquid level alarms as per Condition 2.6.1.5.

High Level Alarms were installed on all tanks and the system was commissioned in March 2013. This has been submitted to the competent authority as per condition 1.4.1 of the permit.

- Table 1.4.1 – reference 13: Submission of an Outline Decommissioning Plan, as per Condition 2.17.

The Outline Decommissioning Plan has been prepared in May 2013 and submitted to the competent authority as per condition 1.4.1 of the permit.

- Table 1.4.1 – reference 14: Submission of measurements of H₂S, thiols and VOCs at several locations around the boundary of the installation and the surrounding area as per condition 2.7.4. The monitoring shall also include an optical gas imaging survey for gas detection monitoring.

This monitoring has been implemented since 2013. Optical gas imaging survey has been carried out in 2013 and 2014 while the measurements of H₂S, thiols and VOCs are carried out on an annual basis. All reports have been submitted to the competent authority as per condition 1.4.1 of the permit.

- Table 1.4.1 – reference 16: Submission of a land and groundwater monitoring proposal in conformity with Articles 16(2) and 22 of the Industrial Emission Directive 2010/75/EU.

This monitoring proposal has been completed in April 2015 and submitted to the competent authority as per condition 1.4.1 of the permit.

- Table 1.4.1 – reference 17: Installation of a permanent extraction system for connection to the road tanker hatch during the unloading of waste oils and for connection to the IBC used for receipt of sludge from the waste oils separation. This extraction is to be connected to the scrubber for treatment of exhaust air.

Following consultation with the competent authority, implementation of non-return (check) valve system has been agreed as more efficient measure. This measure has been implemented in September 2014. This has been submitted to the competent authority as per condition 1.4.1 of the permit.

Delays in the implementation of these items of Improvement Programme have been caused due to the need to further study issues in order to find the appropriate solutions for the most effective outcome as well as due to unavailability of service providers. Some of the measurements were repeated in order to confirm the findings.

Yours sincerely,



Ing. Julia Sammut
Plant Engineer

For and on behalf of
Waste Oils Company Ltd.