

Annex II: Feedback received following the Statutory Consultation carried out for the application of renewal of the Waste Oils Co. Ltd. carried out between 20 June 2018 – 4 July 2018 and between 5 September 2018 and 12 September 2018

Comment received by:	Feedback	ERA reply and comment 9.7.18	Waste Oils Co. Ltd. reply 08.08.18	Comments Received by: 13.9.18	ERA reply and comment 13.9.18	Waste Oils Co. Ltd. reply 24-06-19
External Consultees Feedback						
Environmental Health Directorate	<p>The Environmental Health Directorate has no objection to the proposal. Nonetheless the following conditions are imposed:</p> <ol style="list-style-type: none"> 1. Mitigation measures and monitoring to prevent generation of unpleasant smells from rancid oils are to be adopted. 2. Mitigation measures to prevent that any leakage of oil that might contaminate surface or ground water are to be adopted. 3. Safe and proper handling of raw materials and waste oil on site should also be ensured. Adequate preventive measures are to be taken regarding the potential accidental spillage of, waste oil, hazardous fluids and chemicals are also to be well managed and adequately stored. 4. 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; 5. 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. 	Operator is to take note.	Noted	N.A		
Malta Resources Authority	No feedback provided.					
Planning Authority	No feedback provided.					
Regulatory for Energy and Water Services	<p>As such the REWS has no objection for the variation of permit for the Waste Oils facility operations to include the storage of used cooking oil (EWC 20 01 25 edible oil and fat) collected from households and commercial premises. Nonetheless REWS require the following:</p> <ol style="list-style-type: none"> a) An operations plan to be sent to the REWS – this operations plan should include how the fuel is imported, processed, stored and removed from site, stating all 	Operator to provide feedback.	a) A formal request has already been received by REWS to submit an operations	a) WOCL has started the procedure to register its	N.A	

Comment received by:	Feedback	ERA reply and comment	Waste Oils Co. Ltd. reply	Comments Received by:	ERA reply and comment	Waste Oils Co. Ltd. reply
		9.7.18	08.08.18	13.9.18	13.9.18	24-06-19
	<p>relevant details, volume stored, throughputs etc. This will help REWS to guide WOCL for the submission of the correct application form/s.</p> <p>b) A clarification on the use of fuel oil, diesel (including EN 590) and biodiesel by Waste oils Co. Ltd, i.e. whether it is used internally or sold to third parties.</p> <p>c) The composition (broken down) of both Alternative Fuel Oil and Light Cycle Oil including the percentages of fossil fuel found within these products. Where possible, CN Codes should be provided.</p>		<p>plan and this will be sent directly to them once completed. It is proposed that this be included as part of the improvement programme, to be completed by 08/08/18.</p> <p>b) Waste Oils uses fuels solely for operating boilers and distributes fuels to its waste carriers.</p> <p>c) Alternative fuel oil is obsolete as this is no longer recycled. Waste is being exported without being converted to fuel. Light Cycle Oil is a blending product used with heavy fuel oil and is 100% hydrocarbon with CN code 2710194729</p>	<p>fuel storages.</p> <p>b) Noted.</p> <p>c) Noted.</p>		
Civil Protection Department	CPD is requested a site inspection to verify fire safety measures, prior to providing feedback.	Operator to note.	CPD inspection has been carried out in July	N.A		

Comment received by:	Feedback	ERA reply and comment	Waste Oils Co. Ltd. reply	Comments Received by:	ERA reply and comment	Waste Oils Co. Ltd. reply
		9.7.18	08.08.18	13.9.18	13.9.18	24-06-19
Water Services Corporation	No feedback provided.					
OHSA	In the 'Outline Decommissioning Report' submitted by the applicant, in item 4.1 List of Plant and Equipment, there is table 1 which contains a list of storage tanks with their capacities and products. The products mentioned include substances listed in the Control of Major Accident Hazards (COMAH) regulations. Hence the applicant is requested to submit the list of substances stored at this facility together with the maximum quantity at any time, the MSDS and the classification under the COMAH regulations L.N. 179/2015 (Schedule I, Parts 1 and 2).	Operator is to provide requested information.	The table with substances stored in each tank is found in a separate document together with MSDS. Maximum quantity at any time inside each tank is up to the maximum storage capacity of the tank. All tanks are used to their maximum storage capacity.	WOCL to provide tank capacities as requested in cubic metres. The products mentioned include substances listed in the Control of Major Accident Hazards (COMAH) regulations. Hence the applicant is requested to submit the list of substances stored at this facility together with the maximum quantity at any time in metric tonnes, the MSDS and the classification under the COMAH regulations L.N. 179/2015 (Schedule I, Parts 1 and 2) of each substance. This information is required to determine whether the establishment would be classified under the COMAH regulations.	WOCL to provide the necessary information to the COMAH competent Authorities.	Provided
Transport Malta	No feedback provided.					
Internal Consultees Feedback						
Environmental Assessment Unit	No feedback provided.					

Comment received by:	Feedback	ERA reply and comment	Waste Oils Co. Ltd. reply	Comments Received by:	ERA reply and comment	Waste Oils Co. Ltd. reply
		9.7.18	08.08.18	13.9.18	13.9.18	24-06-19
Biodiversity & Water Unit	<p>The variation to the permit to include the storage of used cooking oil (EWC 20 01 25 edible oil and fat) collected from households and commercial premises, within a bunded area within the Waste Oils Co. Ltd. premises at Marsa has been noted.</p> <p>Noting that this will not be treated on site but rather stored (in bunded area) and exported, there are no comments from a water framework directive perspective.</p>					
Air & Waste Air Quality Team	No feedback provided.					
Air & Waste Waste Management Team	The management of waste cooking oil (20 01 25) needs to be in line with the provisions of regulation 18 of S.L.549.63 – the Waste Regulations and any export of waste edible oil should be in line with any relevant legislation especially with Council Regulation (EC) No 1013/2006.	Requirements will be included as permit conditions.		Please note that we have no further comments from a waste perspective since our previous comment will be included as a permit requirement		
Air & Waste Noise	No comments from a noise perspective.			N.A		
Compliance & Enforcement	<p>1) CEU are finding an issue with the bund wall capacity reaching a maximum height of 2.2m. From inspections carried out on site, officers are aware of the presence of a hatch of 0.5m in height, which is present within the bund wall and opens up to the area under the bund floor. This hatch had been increased in height, so that it could retain any rainwaters that fall within the bund that might be contaminated with oils. On one particular occasion, following severe rainfall, water contaminated with oil had seeped through the hatch and under the bund floor, which could eventually seep through the rock geology. If there is a leak in the largest tank within the bund, as stipulated, the spill would reach approximately 2m, which is way beyond the 0.5m height of the hatch, thus meaning that the oil would seep into and under the bund floor.</p> <p>2) CEU is concerned that the rainwater drain is not sufficient to contain the spill.</p> <p>3) The variation is for the inclusion of Edible Oils and Fats under the EWC Code 20.01.25.CEU is also aware that Waste Oils may be accepting Fish oils and bloods from fish farm operations. If this is the case, the above-mentioned waste code does not cover such wastes. EWC codes under the 02.01 or possibly 02.02 codes should be considered.</p> <p>4) Additionally, CEU would like to request further details on the maximum storage capacity of such oils with possible mitigation measures for any odours which may be generated, in view that considerable quantities can be collected.</p>	Operator is to provide requested information.	<p>1) The hatch has now been rendered watertight and the bund wall was certified as impermeable afterwards.</p> <p>2) This should not be an issue now that the hatch has been rendered watertight</p> <p>3) EWC codes for fish oils will be excluded</p> <p>4)Maximum storage capacity will be that of 6000ltrs of oil at any point in time. IBCs will be thoroughly cleaned</p>	<p>1) Noted, however certifications by independent certified engineer should be forwarded to the authority.</p> <p>2) Same comment as above</p> <p>3) Refer to comments made in the ERA review.</p> <p>4) Noted.</p> <p>5) Agreed.</p> <p>6) Noted.</p>	Operator to provide feedback.	<p>1. These will be provided</p> <p>2. As above</p> <p>3. These codes will be excluded as per previous comments</p>

Comment received by:	Feedback	ERA reply and comment	Waste Oils Co. Ltd. reply	Comments Received by:	ERA reply and comment	Waste Oils Co. Ltd. reply
		9.7.18	08.08.18	13.9.18	13.9.18	24-06-19
	<p>5) Waste Oils Co. Ltd are currently making use of a digital logbook. CEU is not satisfied with such a practice in view that on various inspections, the logbook was noted not to be filled on time. Furthermore, the personnel switching the scrubber on and off may not have access to this digital logbook themselves. ERA suggests that the facility goes back to a physical logbook which is kept at all times near the scrubber.</p> <p>6) Emissions to the Marine environment in the AER was listed as NIL. However following an inspection carried out on site, and following discussions with Oliver Debono, Water located under the bund floor was discharged into a rain water culvert located in front of the facility. How many litres of water had been discharged? These should be accounted for in this section.</p>		<p>after filling and will be covered with a tarpaulin to prevent unpleasant oils and any rainwater from seeping along the containers</p> <p>5) Waste Oils agrees with this proposal and will set up a manual logbook near the scrubber to ensure timely collection of relevant data.</p> <p>6) It is impossible to quantify how much water was discharged as there was no metering system connected with the pump. It has been proposed that a flowmeter should be connected in line with the pump to quantify the amount of water pumped out should this happen again in the future.</p>			
Permitting Unit Waste Permitting	No feedback provided.					