



FALZON
Group of Companies

WASTE OILS COMPANY LIMITED

42, Spencer Hill, Marsa MRS1955, Malta
Tel: (+356) 21 446077 (+356) 21 491026 Fax: (+356) 21 446508
E-mail: info@falzongroup.com

The IPPC Committee,
Malta Environment and Planning Authority,
Hexagon House,
Marsa.

Attention: Mr Michael Sant, Mrs Nathalie Ellul

22nd December 2011

PROPOSED VARIATIONS TO THE CONDITIONS IN THE IPPC PERMIT

Dear Sirs,

With reference to the renewal application for the IPPC permit, please find hereunder our proposals for variations in IPPC permit conditions as had been requested from your side in your communication of 7th October 2011:

1. Monitoring of emissions from boilers - not to be done by an accredited lab with gas chromatography, but to be conducted instead by local warranted boiler engineer through the use of his calibrated instrument. This is also in accordance to Legal Notice L.N. 34 of 1976.

The main reasoning behind this is to have more real-time response to the state of the boiler, adjustment / modification as necessary by the same engineer, subsequent re-testing and final certification. As the system is, we are not getting real value for the money spent other than respecting our obligations and since the major part of the emissions to the environment by WOCL are directly dependant on the state of the boiler, then this would be a more effective solution

We have also realized that other than taking note of the flue gases from the chimney, an accredited lab cannot be expected as having expertise on boiler technology.

2. The IPPC permit required by Waste Oils Company Ltd is clearly required by the EU Directive on account of its function of handling waste. The EU Directive does not oblige an operator to have an IPPC permit on account of its function of handling fuel oils and so these two functions must be clearly defined and the IPPC permit conditions to be categorized appropriately.

3. A clear redefinition and proper guidance of the request for a decommissioning plan for WOCL which takes into account the practical aspect of the present installation which was built in 1993 and the logistics and economics of scale associated with a plant of its type and size. Care must

be given, in particular, to the current set-up and the effects of any requests put forward on the suitability of application.

4. The permit now should cover the processing of waste waters through use of the proposed plant, which was already approved by MEPA.

5. Staggered system of air-monitoring based on the previous results obtained, with the upcoming monitoring programme to be discussed and finally agreed with MEPA on effectiveness grounds prior to the actual application of the programme.

6. The review of EWC Codes to be handled by WOCL.

Thanks and Regards

Ing Ruben Buhagiar
Group Services Engineer,