



FALZON
Group of Companies

WASTE OILS COMPANY LIMITED

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

Attention: Mrs Nathalie Ellul

Friday 3rd February 2012

Please find attached our responses to your communication of 25th January 2001, keeping the same format:

Annex I: Comments made by IPPC Committee regarding proposed variations

Issue	IPPC Committee response 20 January 2012
Permit validity	No further comment
Monitoring of emissions from boilers	<p>We have related your queries to our boiler engineer, Ing Bellizzi, with whom we have full trust in his expertise. His calibrated instrument caters for O₂, CO, NO_x, flue gas temp. The normal procedure calculates SO_x using standard tables which are accepted worldwide.</p> <p>For PM, one needs laboratory equipment. In reality, the monitoring of PM from the boiler is irrelevant to the state of the boiler, and PM values can be given using accepted methods of calculations, as done in the E-PRTR reporting. Moreover, one must consider the relative levels of PM issuing from the boiler as opposed to the very significant PM levels in the area caused by other sources (eg road traffic).</p> <p>One must keep in mind the size of the boiler plant and its operation. And relate the requested practices to enterprises of similar size.</p>

Issue	IPPC Committee response 20 January 2012
	We re-iterate that this is the accepted engineering standard in monitoring and maintaining a boiler in optimum working efficiency and, besides the monitoring giving us data which we can rely forward to the Authorities, it helps the operator also to adjust / optimize his equipment.
Handling of fuel oil and gas oil	Whilst the handling of fuel oil and gas oil are part of activities taking place in Marsa, it must be clear in the IPPC that the permit is needed on account of the waste-processing facility and IPPC requirements must focus entirely on processes dealing with waste, as per LN56:2008
Decommissioning plan	Noted. This will be tackled in the coming months. Please note that the site where WOCL today stands was originally a dump, and if anything, the site will be restored, on de-commissioning, to a much better state that when it was originally found.
Wastewater	The intention of the company is to re-use the product water, having spent all the monies involved to get it to the required standard. It is too early at this stage to clearly define the 'normal' operating use of the water, as this depends on the market and practicalities. In the event of transfer, export or discharge, the normal environmental conditions/procedures will be followed accordingly. At this stage, one must decide on the course of action on the conditions any particular situation present.
Air monitoring	Noted
EWC codes	WOCL would like to include the following EWC codes with its current permitted codes: 05.01.03 15.01.10 15.02.02 16.01.07 16.01.14
Road tanker fuel consumption	Road Tankers are regulated by the MRA and the Transport Authority, whose regulation is in turn based on the requirements of the NEC (Directive 2001/81/EC). Fuel stations around the country do not require an IPPC permit and this activity is no exception.

Annex II: Comments made by IPPC Committee regarding status of the Improvement Programme

Issue	IPPC Committee response 20 January 2012
Submission of an EMS	Noted
Certification	Noted. As had been discussed, the certification of the plant (all of which is, as inspected on several occasions, included within the bund area of operation) is in the hands of the warranted engineer who will be examining the schematics of the pipework recently updated to reflect the current design of the plant.
Emergency response plan	Noted.
Oil spillage response plan	Noted.
Certification from fire company	Noted
High liquid level alarms	Noted. We have identified the high level alarms to be purchased but we have had difficulty in purchasing the required cabling in economic amounts as, unfortunate due to the current worldwide economic state of affairs, stockists were to date reluctant in dealing in other than whole drums of cabling – hence the delay. This matter is finally and hopefully about to be resolved, in which case we hope to have the system running later on in the year.
Air emissions (monitoring of parameters around the installation).	WOCL will, as has done in the past, seek approval/agreement on monitoring programme prior to investing.
Air emissions (monitoring of thiol concentration in tank headspace)	Noted
Air emissions (connection of tank to scrubber).	Noted
Air emission (implementation of abatement for VOC and H ₂ S)	Noted
Noise monitoring	Noted
Decommissioning Plan	Noted. As in Annex 1
Air emissions (implementation of odour	Noted

Issue	IPPC Committee response 20 January 2012
abatement application)	
Drawings and calculation of spillage containment volumes.	Noted.
Registration of barges used for transport of waste.	Noted
Wastewater Analyses	Noted .

Thank you

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