

Grima Gabriella at ERA

From: Dr Joe Doublet [REDACTED]
Sent: Thursday, 17 May 2018 18:51
To: Stephen J. Mifsud
Cc: Andre Zammit; Gasparell Baling Co. Ltd.; Victor Bonello; Raffai Zsolt at ERA
Subject: Re: Fees for storage of fuels
Attachments: Techn. Doku. EN 76A-220.pdf

Dear Mr Mifsud,
the only option left for client is to use the sensor probe in the existing tank and this will limit usage to below 300ltrs as established by the Legal Notice.

I am forwarding the relevant literature about this probe for your attention and perusal.

Unfortunately, under the present legal parameters, there aren't any other solutions left for client.

Thanking you for your attention.

Best regards

Joe

On 16/05/2018 12:52, Stephen J. Mifsud wrote:

Dear Dr Doublet,

As I work with the Regulator for Energy and Water Services, I am not in a position to indicate to you who produces or who supplies tanks of the desired specifications.

Due to the size of the tanks, I understand that the lower capacity ones should be used for transport while the higher capacity ones are used for fixed storage.

Since local legislation for a notification to store petrol cannot exceed 300 litres of this product, you are left with no option (unless you apply for a primary storage facility).

You may choose to bund any petrol spillages to protect your area and the Environment, however bunding petrol indoors is dangerous as it is very volatile.

As a general rule, for new installations, the Regulator normally approves double-skin tanks constructed to EN 12285-2 or equivalent, especially for Petrol storages.

However please note that the final decision before ordering needs to be taken by your Competent Person (Ing Victor Bonello).

Regards,
Stephen Mifsud
f/REWS

From: Dr Joe Doublet [REDACTED]
Sent: 02 May 2018 17:42
To: Stephen J. Mifsud
Cc: Andre Zammit; Gasparell Baling Co. Ltd.; Victor Bonello; Raffai Zsolt at ERA
Subject: Re: Fees for storage of fuels

Dear Mr Mifsud,

we have been in contact with local and foreign suppliers of storage tanks who could potentially supply us with tanks of the desired volume. Unfortunately, their comments were practically similar. Primarily that legislation in the EU is that tanks with a volume of 300lts are used for transport and those of 990lts for storage leading them to produce tanks for such purposes with these volumes.

The last example from a European supplier found at a specialized fair held recently is the one attached. The company has also offered offered to supply a bund for this tank. If that is fine for you then one could order it.

The last remaining alternative is that you indicate to us who produces or who in Malta is in possession of tanks of the desired specifications according to the current legislation and which you might have already approved for these purposes so that client could buy one of them.

Thanking you for your attention.

Best regards

Joe

On 19/04/2018 14:59, Stephen J. Mifsud wrote:

Dear Dr Doublet,

The storage of large volumes of petrol in a single-skin tank with a bund indoors is definitely a no-go.

Since our meeting, there have been a number of changes in the way forward Gasparell will take for the storage of petrol.

I kindly ask you to review those 'CCB' Data sheets you have sent to the REWS (or the Data sheets of any other eligible New tank) with a volume of less than 300 litres as discussed, and present them to the company's consultant Ing V. Bonello.

Make sure that the new tank conforms to a relevant Standard and provide this certification after having consulted with the engineer. Speak to him also about ventilation within the storage room.

Thank you,

Ing Stephen J. Mifsud
Fuel Analyst



Millennia, 2nd Floor
Aldo Moro Road
Marsa, MRS 9065
Malta
Tel: +356 22955131

From: Dr Joe Doublet [REDACTED]
Sent: 13 April 2018 19:00
To: Stephen J. Mifsud

Cc: Andre Zammit; Gasparell Baling Co. Ltd.
Subject: Re: Fees for storage of fuels

Dear Mr Mifsud,

local agent has contacted supplier of tanks which are produced in Italy for such a purpose. In fact supplier produces other equipment associated with depollution of vehicles as shown on their website (<http://www.iris-mec.it>).

Below you may find correspondence regarding this issue. The only certification issued on this size of tank is that for the safety valve whereas the tank is single skinned and bunded and its wheels can be removed in order to retain it in a fixed place.

Hope that this is sufficient for your approval.

Best regards

Joe

Joe. supplier explained that for this size of tank there is no added certification needed

only that of the valve call me and I will explain better tomorrow

cheers

Ray Muscat

From: [REDACTED]
Sent: 09 April 2018 18:03
To: Ray Muscat; 'Patrizia Bacchi - Iris-Mec srl'
Subject: R: serbatoio

Ray Buongiorno

Scusa il ritardo

Allego foto dove si vede la valvola certificata a doppio effetto che montiamo su tutti i serbatoi a Benzina

Essendo i vapori di benzina cancerogeni ed altamente infiammabili questa valvola permette di mantenere il serbatoio completamente chiuso

Solo durante il riempimento e lo svuotamento l'aria esce oppure entra ...

N.B.: la valvola cambia secondo la dimensione dei serbatoi questa della foto viene montata fino a 1000 lt

Roberto Bacchi | *Technical Sales Engineer* – Responsabile Tecnico Commerciale
Iris-Mec S.r.l.

Via Pessina, 15 – 42028 – Poviglio (RE) – ITALY

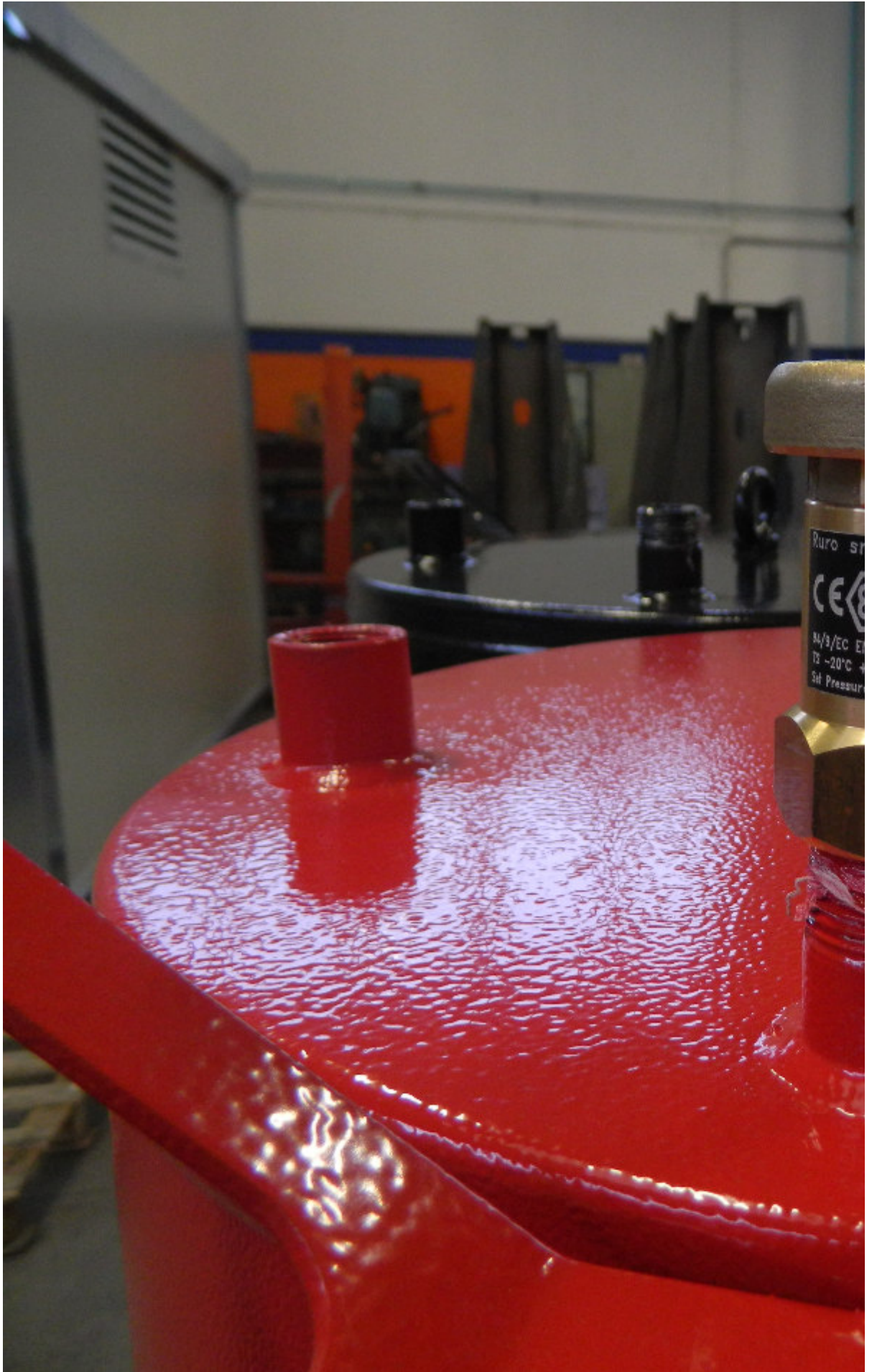
Tel +39 0522.481047 - Fax +39 0522.481935 - Web: <http://www.iris-mec.it>

Capitale sociale euro 40.000,00 i.v.

Registro Imprese di Reggio Emilia e codice fiscale n. 02237310350

R.E.A. di Reggio Emilia n. 263830

DSCN4313.jpg



On 29/03/2018 03:04, Stephen J. Mifsud wrote:

Dear Dr Doublet

Please ask your competent person to verify if the tank is fit for purpose. Furthermore please ask him /manufacturer if the wheels may be removed for better stability and safety.

Thanks
Stephen

From: Dr Joe Doublet [REDACTED]
Sent: 28 March 2018 17:01
To: Stephen J. Mifsud
Cc: Andre Zammit; Gasparell Baling Co. Ltd.; Raffai Zsolt at ERA
Subject: Re: Fees for storage of fuels

Hi,

further to telephone conversation last week regarding installation of small fuel tank, it transpired that the original tank suggested by local representative had a capacity of 320lts so it wasn't suitable. Finally, he found a smaller tank which has a capacity of 220lts and is on wheels together with corresponding bunding.

Enclosed please find leaflet showing the suggested tank for your approval prior to purchase.

Please feel free to contact us for any clarifications.

Thanking you for your attention.

Best regards

Joe

On 02/01/2018 11:05, Stephen J. Mifsud wrote:
Good morning,

As per your request on the licensing of Gasparell fuel storages, we are proposing a meeting this Friday 5th January at 10:30 am at REWS offices - address below.

Can everyone confirm their participation please?

Thank you,

Stephen J. Mifsud
Fuel Analyst

[<cid:part1.8134DF7E.41CE69F5@vol.net.mt>]
Millennia, 2nd Floor
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From: Dr Joe Doublet [REDACTED]
Sent: 21 December 2017 17:04
To: Stephen J. Mifsud

Cc: Miriam Micallef Sultana; Andre Zammit;
Gasparell Baling Co. Ltd.; Aquilina Anthony J at
ERA; Raffai Zsolt at ERA; Victor Bonello
Subject: Re: Fees for storage of fuels

Dear Mr Mifsud,

I just spoke to client about this issue. He would like to hold a meeting with you or your superiors to discuss the way forward. The consultant engineer Ing V Bonello would also need to be present.

Considering the fact that most offices will be closing down for shutdown tomorrow and returning back on the 3rd of January, ideally such a meeting should be held in early January 2018.

Thanking you for your attention.

Best regards

Joe

On 21/12/2017 11:50, Stephen J. Mifsud wrote:
Dear Dr Doublet,

In your email dated 6th December 2017, you confirmed to the REWS that petrol and diesel stored in the tanks at the site is being "used in vehicles", and that the tanks are equipped with dispensers. In addition, the dispensing equipment is visible in the images attached to that email. For these reasons, the facility is not considered as a secondary storage site, but a petroleum-filling station as a Commercial Site as defined in S.L. 545.22 (Petroleum for the Inland (Retail) Fuel Market Regulations). Definitions are reproduced hereunder:

"petroleum-filling station" means an authorised facility which has been approved by the Regulator to store petroleum at a retail site or at a commercial site, and which may be subject to any such conditions as the Regulator may establish in the applicable authorisation;

"commercial site" means a site that is not open to the general public but where automotive fuel is dispensed;

To date no application was received by the MRA or REWS from Gasparell. Therefore I reiterate what I guided you for in my e-mail of the 14th December, whereby an application for a Commercial Petroleum filling Station site needs to be submitted to the REWS.

A competent person has to be engaged in order to compile a Technical Proposal indicating the design details of this site.

Our question regarding the third tank remains unanswered. Can you kindly clarify the contents of this tank in writing?

Hope this helps,

Regards,

Stephen J. Mifsud
Fuel Analyst

[\[cid:part1.8134DF7E.41CE69F5@vol.net.mt\]](#)

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From: Dr Joe Doublet [REDACTED]
Sent: 15 December 2017 18:21
To: Stephen J. Mifsud
Cc: Andre Zammit; Gasparell Baling Co. Ltd.
Subject: Re: Fees for storage of fuels

Dear Mr Mifsud,

reference is made to the application sent and the telephone conversation held yesterday.

I was trying to fill the application sent for a Petroleum-filling Station and noticed that client cannot sign or submit the requested documentation because primarily he cannot submit a MEPA compliance certificate for the location to operate a commercial filling station and furthermore the requested design details for such a filling station cannot be submitted since this is not a petroleum filling station and so such designs do not exit! Note that the tanks are used for the purpose of recovering any fuel left in vehicles which are being depolluted during the ELV process. At no point during any consultation have we ever been information by any of the consulted stakeholders, including MRA, at the time, that this site should be considered as a petrol filling station.

I spoke to Ing Victor Bonello who told me that such a facility would be considered as a secondary storage facility since the fuel storage is below 3000ltrs and that would require a notification and authorization depending on whether one is considering petrol or diesel.

Furthermore note that the definition given in SL 545.22 for a secondary storage facility is:

"secondary storage facility of petroleum" means an authorized facility:

(a) used for the authorised person's own exclusive use;

(b) which is not a primary storage facility for the purposes of the Petroleum for the Inland (Wholesale) Fuel Market Regulations; and

(c) which is in excess of a lower limit of 300 litres:

Provided that when a secondary storage facility of petroleum consists of one or more tanks it may be construed by the Regulator of consisting of a single secondary storage facility of petroleum;

So from the looks of it, if you keep insisting that the application for a petrol filling station should be filled, then applicant cannot submit the requested documentation so the application will remain pending and cannot be submitted or is invalid if submitted. The alternative to that is to apply for a secondary storage facility and in that case then all documentation could be submitted since the site has all the necessary permit to operate including an IPPC and a planning permit.

Note that there are other sites who are working using similar equipment and never heard that these are operating a petroleum filling stations or were granted a permit to operate as such.

Kindly advice.

Best regards

Joe

On 14/12/2017 08:30, Stephen J. Mifsud wrote:

Dr Doublet

Sorry for our small delay in replying.

Thanks for your reply and the information provided. The site is considered as a petroleum-filling station and a commercial site.

According to S.L 545.22, the applicable fee for applying for an authorisation for operating a petroleum filling station is €500 (see Second Schedule); and the applicable authorisation fee for operating a petroleum filling station is €500 per year and €50 per nozzle (see Third Schedule).

Attached you may find the Commercial Site Petroleum filling Station Application Form.

>From the pictures you provided, there is a third tank (in addition to the tanks used to store diesel and petrol). The fuel being stored in this third tank is not clear. Can you kindly clarify as to the contents of this tank?

Thank you,

Stephen J. Mifsud

Fuel Analyst

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From: Dr Joe Doublet [REDACTED]
Sent: 12 December 2017 18:01
To: Andre Zammit; Stephen J. Mifsud
Subject: Fwd: Re: Fees for storage of fuels

Hi,

gentle reminder re email sent on the 6th instant.

BR

j

----- Forwarded Message -----
Subject:

Re: Fees for storage of fuels

Date:

Wed, 6 Dec 2017 12:25:31 +0100

From:

Dr Joe Doublet
[REDACTED]

To:

Andre Zammit
[REDACTED]

CC:

Stephen J. Mifsud
[REDACTED]

Hi,

I am enclosed a copy showing the photos of the unit which retains all the different fluids, including diesel and petrol, emptied from vehicles. Below please find volumes of tanks used to retain fluids.

Br

joe

I've linked 2 files to this email:
[cid:part9.169A2C5F.4EC5F2D8@vol.net.mt] IMG_1916.jpg<<https://app.box.com/s/54mo9p6g55dzklgbo66lppx6iu40dl8o>> (2.2 MB) [cid:part11.189C73A9.006548B2@vol.net.mt] Box<<https://www.box.com/thunderbird>><https://app.box.com/s/54mo9p6g55dzklgbo66lppx6iu40dl8o>
[cid:part9.169A2C5F.4EC5F2D8@vol.net.mt] IMG_1917.jpg<<https://app.box.com/s/luds40uhoft7ikjhu3i48bguojfx5agd>> (2.1 MB) [cid:part11.189C73A9.006548B2@vol.net.mt] Box<<https://www.box.com/thunderbird>><https://app.box.com/s/luds40uhoft7ikjhu3i48bguojfx5agd>
Mozilla Thunderbird<<http://www.getthunderbird.com>> makes it easy to share large files over email.
On 06/12/2017 09:30, Andre Zammit wrote:
Hi Joe,

Thanks for your email. In order to assist you further, please specify the exact number of fuel tanks, their capacity and type of fuel stored. Also please clarify how this fuel is being used on site.

For your convenience, you can fill in the following table:

Tank

Volume of fuel (in litres)

Type of fuel

Use of the fuel

Dispenser/Nozzle present

1

875

diesel

used in vehicles

* Yes ☐ No

2

875

petrol

used in vehicles

* Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

...

With this information, we would be able to guide you as to the applicable fees.

Do not hesitate to contact us again by phone should you require any further assistance.

Thanks for your attention.

Regards,

André Zammit
Officer
Competence, Licensing and Enforcement

[cid:part1.8134DF7E.41CE69F5@vol.net.mt]
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-----Original Message-----

From: [REDACTED]
[[mailto:](#)]
Sent: 01 December 2017 09:44
To: Andre Zammit
Cc: Stephen J. Mifsud
Subject: Fees for storage of fuels

Hi,

reference is made to comments submitted by REWS regarding renewal of IPPC permit for the Gasparell site at Hal Far and telephone conversation held yesterday with one of your staff.

I would like clarifications regarding the fees which would be due to store a maximum of 900ltrs of diesel and petrol which is being recovered from the ELV procedure. From what I can understand in the case of diesel this should be 50 euros (S.L 545.22) whereas I couldn't understand the one related to petrol since there are two Schedules, it isn't clear what the annual fee is. Could you please explain.?

Thanking you for your attention.

Best regards

Joe