

Grima Gabriella at ERA

From: Dr Joe Doublet [REDACTED]
Sent: Friday, 26 April 2019 11:22
To: Stephen J Mifsud; Gasparell Baling Co. Ltd.
Cc: Andre Zammit; Ciarlo Andrew at ERA; Ellul Nathalie at ERA; Agius Farrugia Pauline Marie at ERA; Victor Bonello
Subject: Re: Condition 14 IPPC permit 004_12
Attachments: Insurance - Fuel Tanks.pdf

Dear Mr Mifsud,

enclosed please find copy of insurance certificate.

Thanking you for your attention.

Best regards

Joe

On 16/04/2019 13:30, Dr Joe Doublet wrote:

Dear Mr Mifsud,

replies re email dated 27/3/19:

- 1) Note that truck and tank are used solely for internal purposes and not for distribution outside premises.
- 2) Note that Baler is a mobile baler and not a fixed one so no registration is required.
- 3) See answer to point 2 above.
- 4) Equipment is specifically designed and certified for internal usage including air vents. Equipment has been installed according to manufacturer's specifications, however we are in contact with manufactures for clarifications.
- 5) Insurance will be submitted later;

Compliance certificate being handled by Architect.

Thanking you for your attention.

Best regards

Joe

On 27/03/2019 11:41, Stephen J Mifsud wrote:

Good morning Mr Cutajar and Dr Doublet,

We note the report by b.Nel Eng Consultancy and report VB/me/R4719/19 dated 15/03/19 and we have the following comments:

1) The use of a fuel bowser is regulated by the Regulator for Energy and Water Services by S.L. 545.22 - Petroleum for the Inland (Retail) Fuel Market Regulations. We advise you consult this legal notice and apply for an Authorisation to carry out an activity of a fuel distributor. A non-refundable application fee of €500 applies and the annual fee, if you keep one fuel bowser is € 550. You need to appoint a DGSA the list may be found at the TM website
- <http://www.transport.gov.mt/land-transport/becoming-a-transport-operator/dangerous-goods-transport/dangerous-goods-safety-advisor>

2) The report VB/me/R4719/19 mentions the 'Bailer Diesel Engine Fuel Tank'. We note that this was not included as one of the tanks to be Notified / Authorised in your application for a secondary storage facility dated 11/10/2018 and submitted on the 15/10/18

3) Table 1.1.1 of the IPPC permit for Gasparell mentions *From receipt of diesel from MRA-authorized suppliers to dispensing to onsite machinery*. Any other fuel tank or storage also needs to be included in the application as per 2) above and any subsequent reports by the competent person.

4) If the fuel tanks are going to remain in their current place the air vents should preferably be re-rerouted outside the room and have a flame arrestor installed or propose other suitable mitigation measures. If the fuel tanks are going to be moved next to the bailing plant, a new comprehensive report must be submitted by the Competent person.

5) Still pending are:

- the insurance document, covering all fuel tanks on site
- a PA compliance Certificate

Please inform the Regulator on your intentions in order to regularise your position by the 25/04/2019.

Thank you
Stephen

-----Original Message-----

From: Dr Joe Doublet [REDACTED]

Sent: 15 March 2019 17:39

To: Andre Zammit [REDACTED]; Stephen J Mifsud

[REDACTED] Ciarlo Andrew at ERA

[REDACTED]; Ellul Nathalie at ERA

Agius Farrugia Pauline Marie at ERA [REDACTED]

Gasparell Baling Co. Ltd. [REDACTED]

Subject: Condition 14 IPPC permit 004_12

Dear Ing Mifsud and Zammit,

enclosed please find copy of report by REWS competent person describing how fuels collected from the ELV unit will be transferred from the holding tanks to the machinery on site at the Gasparell Baling Plant in Hal Far as per condition 14 of IPPC Permit IP 004_12 for your attention and perusal.

Thanking you for your attention.

Best regards

Joe