

TTF Improvement Programme Update

Updated On: 29.05.2023

Ref.	Requirement	By When	Status	Status Update
26	Submission of a report, by a suitably qualified person approved by the Authority prior initiation, related to a review of the performance of the facility against the conditions in this permit and the Waste Incineration BAT conclusions (as per CID 2019/2010/EU). and submission of details of procedures/plans to be developed for achieving and demonstrating compliance with permit conditions. The plan shall also include: a) A comprehensive air emission improvement strategy b) A proposal for execution of implementation measure identified in a) including timeframes.	Within 4 months of the granting of the permit	Closed	The Air Emission Improvement Strategy was submitted to ERA on 09.02.23.
27	The submission of a decommissioning plan in relation to the existing autoclave boiler and the associated LPG tank including details of how it shall be disassembled in an environmentally safe manner and waste disposed of in accordance with applicable regulations.	Within 8 months of granting of the permit	Closed	Contract has been awarded to NAS Ltd on 06.12.2021. Boiler was decommissioned and removed from the premises. As per declaration signed by contractor, decommissioning was as per Method Statement submitted.
28	Registration of the replacement autoclave boiler in line with S.L. 549.122 following the decommissioning the existing boiler as per Improvement programme item 27.	By Q4 2021	Open	The registration of the boiler shall be effected via this Request for Variation - refer to Annex 14.
29	a) Submission of an addendum to the land & groundwater risk assessment to take into consideration the recent fire incident	a) With 1 month of granting of the permit	Closed	The addendum to the land & groundwater risk assessment has been submitted on 27.10.2021.
	b) Submission of a method statement for monitoring	b) With 2 months following the approval of a)	Closed	The method statement was submitted to ERA on 02.05.2023.
	c) Submission of a baseline report in conformity with Articles 16(2) and 22 of the Industrial Emissions Directive, 2010/75/EU following submission of the implementation of the monitoring in line with the approved method statement.	c) As agreed upon with the Authority	Open	Pending on 29 b).
30	a) Submission of a finalized plan for the upgrades listed Approved DOC IP0004/07/C/DOC1.	a) Within 3 months of granting of the permit	Closed	A Method Statement Update was sent to the Authority on 26.10.21. Request for Variation shall be submitted to ERA to include the mitigation measures indicated in the plan.

	b) Notification of installation and commissioning of odour abatement equipment as per Approved DOC IP0004/07/C/DOC1 (for the listed improvements on the waste marshalling area (4), chemical scrubber or ionizer (7) and tallow silos vents (8) including the submission an application for variation/s to this IPPC permit.	b) Within the timeframe agreed with the Authority following implementation of a)	Open	This Request for Variation contains the details pertaining to measures WasteServ intends to put in place to radically address odour issues. It is expected that by the time that this variation is processed, all equipment is commissioned. For all intents and purposes, this variation shall also serve as a notification of installation.
31	a) The submission of a method statement on surrogate parameter odour monitoring	a) Within 2 months of the granting of the permit	Closed	WasteServ sent a revised Method Statement to ERA on 08.03.2023.
	b) The submission of monitoring results of the first sampling episode of testing.	b) Within the timeframe agreed by the Authority	Open	Following the approval of the revised Method statement, WSM has started the procurment process for the service of sampling and anlysis.
32	a) Submission of a revised odour management plan aimed at identifying sensitive receptors around the installation	a) Within 2 months from the granting of the permit	Open	Dependant on 31 b)
	b) Submission of a revised odour management plan following: i) the submission of the first sampling episode of surrogate parameter monitoring test results. ii) Implementation of improvement programme item 30.	bi) Within 2 months from the submission of the first sampling episode bii) Within 12 months from the granting of the permit	Open	Dependant on the above.
33	Submission of revised as-built site drainage layout plans differentiating between clean rainwater, sewage and trade effluent cleared by the Water Services Corporation and the Planning Authority.	Within 5 months from the granting of this permit	Open	The revision of the site drainage layout plans is still on-going. WSM has requested an extension of this deadline.
34	Implementation of automatic wastewater monitoring equipment on the WWTP outlet reservoir to monitor quality prior to discharge to sewer.	Within 12 months from the granting of this permit	Open	Monitoring of wastewater is being carried out twice a week. WasteServ is the process of issueing a tender for the sourcing of the required monitors. The tender is currently at SPD (Ref. SPD8/2022/178). Estimated timeline: End of March 2023 - uploading of the tender on ePPS June 2023 - signing of contract November 2023 - commissioning of tender.
35	Certification from a competent company or engineer that the relevant fire safety procedures and equipment are in place, including emergency firefighting water supplies for use by the Civil Protection department.	Within 3 months of issue of permit	Closed	The certification has been submitted on 05.11.2021. ERA has forwarded the certification to CPD on 16.11.2021.
36	a) Submission of a performance test to calculate the boiler efficiency based on FDBR RL 7: Acceptance Testing Of Waste Incineration Plants With Grate Firing Systems.	a) Within 9 months of granting of the permit	Closed	The Boiler Performance Test Report was submitted to ERA on 30.05.2022.
	b) Depending on the results of the performance test in a) above, submission comprehensive review of the options available for improving the boiler efficiency may be requested by the Authority.	b) As agreed upon with the Authority	Closed	N/A.

37	Submission of a report for the calibration and verification testing of the performance of continuous emission monitoring (CEMS) (for the parameters with a specified frequency of monitoring marked as continuous in table 2.2.6) in line with the requirements of EN 14181, specifically the requirements of QAL1, QAL 2 and QAL 3. The report shall also include details of the certifiable range of the CEMS.	Calibration report shall be submitted within four weeks of completion of calibration exercise	Closed	Results of QAL2 and QAL3 were sent to ERA on 22.03.2022.
38	Submission of a risk assessment to determine whether additional firewater retention capacity is required.	Within 5 months from the date of granting of this permit	Closed	The risk assessment has been submitted to ERA on 05.11.2021.
	Subject to findings and recommendation of a), the Permit Holder shall prepare and implement a suitable risk management programme.	Within the timeframe agreed with the Authority	Open	Following internal discussions, WasteServ shall be discarding the 'use of booms idea' and in turn opt for diverting firefighting water to tanks on site.
39	a) Submission of a risk-based OTNOC Management Plan as required by BAT 18 in the Waste Incineration BREF. The plan shall include a list of scenarios considered to represent OTNOC and the associated proposed techniques to reduce associated emissions to air and water during each of the OTNOC scenarios identified.	a) Within 4 months from the date of granting of the permit	Closed	A revised OTNOC Management Plan was submitted to the Authority on 24.11.2021. A subsequent update was submitted on 02.05.2023.
	b) Shall submit a proposal for monitoring during OTNOC events identified under a)	b) Within 2 months from completion of a)	Closed	With the exception of when the ERS is open, emissions are still monitored. When ERS is open, emissions are calculated using a predefined model.
40	Submission of a start-up and shut-down plan setting out the necessary steps to be taken by the Permit Holder during such operations to ensure that all appropriate preventative measures against pollution are taken and to limit as far as practicable start-up and shut-down operations.	Within 6 months of granting of the permit	Closed	The plan has been submitted to ERA on 27.10.2021.
41	Notification of installation and operation of the auxiliary burner.	Within 18 months of granting of the permit	Open	WSM has started the process of procuring the auxiliary burners. Tender Document No. WSM6/23.