

Annex I: Comments regarding the IPPC application – Marsa Thermal Treatment Facility (IP0004/07/C/V2)

Form A

Section	Duly made?	ERA Comments 11 January 2023	Comments by WasteServ May 2023
Application Reference Number	✓	Kindly note this has been assigned as IP 0004/07/C/V1	/
A1.1	✓	Noted	/
A1.2	✓	Noted	/
A1.3	✓	Noted	/
A1.4		<p>Document: Annex 03 Development permits</p> <p>Kindly also include PA 5115/07</p> <p>Document: Annex 3 Sewer Discharge Permit – DMU 6811</p> <p>Noted</p> <p>Document 3: Extract of IPPC permit IP 0004/07/C</p> <p>Noted</p>	<p>Refer to Annex 03. Existing Permits.</p> <p>/</p> <p>/</p>
A2.1	✓	Noted	/
A2.2	✓	Noted	/
A3.1	✓	Noted	/

A3.2	N.A	Noted	/
A3.3	N.A	Noted	/
A3.4	N.A	Noted	/
A3.5	✓	Document: Annex 02 Certificate of Incorporation Noted	/
A3.6	N.A	Noted	/
A4	✓	Noted	/

Form C

Section	Duly made?	ERA Comments 11 January 2023	Comments by WasteServ April 2023
C1.1	✓	Noted	/
C1.2	✓	Document: Covering Document – 2. Scope of the application & Non-Technical Summary Noted	/
C1.3	✓	Document: Covering Document – 2. Scope of the application & Non-Technical Summary <ol style="list-style-type: none"> Kindly include revisions to the EWC code list (as per annex 11) also as part of the listed variations. With respect to the maximum tallow used per day page 4 states 2T/day whilst annex 6 quotes 1.5 T/day. Kindly clarify? 	<ol style="list-style-type: none"> Refer to Section 2. Scope of Application & Non-Technical Summary Maximum tallow used per day is 1.5 T. Refer to page 6 of the updated Covering Document.

		<p>3. What are the proposed timeframes for commissioning of the slated variations involves installation of infrastructure or equipment?</p> <p>4. Kindly clarify the following statement “The air emanating from the heating unit of the Dual Fuel Burner shall be directed by means of ducting to the RTO where it shall be treated. ”</p> <p>It is understood that the waste gas from the dual fuel burner will be eliminated from the incinerator stack. Kindly confirm.</p>	<p>3. Refer to Section 3. Timeline of the Covering Document.</p> <p>4. During the trial period of the dual burner tallow was being manually transferred to IBCS, and thereafter pumped to the system. During normal operation this practice shall not happen, instead tallow shall be pumped from the silos in an enclosed circuit.</p> <p>Once the tallow is inserted in the kiln and ignited, the products of combustion and flue gas goes through the normal path, that is from PCC to SCC to back house filter to chimney stack.</p>
C1.4	N.A	Noted	/
C1.4.1	N.A	Noted	/
C1.4.2	✓	This is applicable but this is deemed as addressed through C1.4.3	/
C1.4.3	✓	<p>Document: Annex 05 – Site Plan</p> <p>1) Kindly also identify the LPG boiler, which is in scope of the variation to the site plan.</p> <p>2) It may be requested that certain aspects of the tallow burner (lance, skid, heated pipes) will be removed, to be confirmed during pre-permit site visit. This will serve to replace schedule 4 in IP 0004/07/C, kindly note that a version without the disclaimer is to be provided.</p>	<p>1. & 2. Refer to Annex 05 (Site Plan amended to include LPG Boiler and the disclaimer has been revised to allow use of drawing).</p>
C2.1	✓	<p>Document: Covering Document - 3. Technical Details</p> <p>Noted, kindly indicate timeframes when such documentation will be available.</p>	<p>Refer to section 4. Technical Details of the Covering Document. Timeframe has been included in C2.1 (Q2 of 2023).</p>

C2.2.1	✓	Document: Covering Document - 2. Scope of the application & Non-Technical Summary Noted	/
C2.2.2	✓	Document: Covering Document - 3. Technical Details Noted.	/
C2.2.3	✓	Document: Annex 07 – Process Flow Diagram With respect to the odour abatement flow diagram kindly also include in the schematic the treatment of “ air emanating from the heating unit of the Dual Fuel Burner shall be directed by means of ducting to the RTO” Dual Fuel Burner flow diagram noted.	Refer to updated Annex 07 – Odour Abatement Process flow. /
C2.2.4	✓	Document: Annex 09 – BAT Comparison Noted, kindly note respective comments in Annex III and Annex IV	/
C2.2.5	✓	Document: Covering Document - 3. Technical Details Noted	/
C2.3	✓	Document: Covering Document - 3. Technical Details Noted	/
C2.4	N.A	Noted	/

C2.5	✓	Document: Annex 08 – Maintenance Plan Noted with respect to the dual fuel burner, in terms of the odour abatement maintenance plan kindly provide once available.	Documentation from the contractor has been received, however, it is quite voluminous. WSM is working on extracting the schedule from the manual provided.
C2.6.1	✓	Document: Covering Document - 3. Technical Details Kindly provide the requested information in table format. <ol style="list-style-type: none"> 1) Annual energy consumption of the main energy consuming equipment 2) Generation by source and end-use (including information on energy generated on site, if applicable). 3) What is the expected annual fuel consumption per year for the RTO. 	<ol style="list-style-type: none"> 1) Refer to section 4. Technical Details of the Covering Document. The Boiler consumption has been added in C2.6.1. 2) N/A. 3) 438,000 kg of LPG.
C2.6.2	x	Document: Covering Document - 3. Technical Details Kindly indicate	Refer to section 4. Technical Details of the Covering Document. Basic measures for improvement of energy efficiency have been added in C2.6.2.
C2.7	✓	Document: Covering Document - 3. Technical Details Noted	/
C2.8	✓	Document: Covering Document - 3. Technical Details Noted Annex 10 – Emergency Response Plan (Controlled_Document_033_TTF_Emergency_Response_Plan_Rev02 Risk Assessment – TTF) With respect to Annex 10, it is implied that the documentation need to be updated in view of the introduction of new equipment and additional fuel. Kindly confirm and provide timeframe by when the documentation will be updated.	The ERP shall be updated by the end of June 2023.

C2.9	✓	Document: Covering Document - 3. Technical Details Noted, kindly indicate when training records can be provided.	Training has been carried out on 21.12.2022 and on 30.01.2023. Refer to section 4. Technical Details of the Covering Document C2.9 Training. Refer to attached internal training logs filled in for each training given by the Contractor.
C2.10	✓	Document: Covering Document - 3. Technical Details Noted, kindly update outline decommissioning plan and provide a timeframe for submission. Annex 12- Decommissioning instructions Dual Fuel Burner Noted	Refer to Annex 12 – Outline Decommissioning Plan Rev01 (a revised version including autoclave and air abatement equipment). /
C2.11	N.A	Noted	/
C3.1.1	✓	Annex 11 – EWC codes Noted <ol style="list-style-type: none"> 1) Kindly include the note in the notepad text listed in the document. 2) Kindly confirm if there is any changes in terms of the storage capacities. 3) With respect to the point 14 in the covering document it is understood that the sand/salt trap will generate waste on replacement. Additionally in terms of the filters how will the washing take place and where will the waste water be disposed of. 	<ol style="list-style-type: none"> 1) Included. Refer to Section 4. Technical Details of the Covering Document C3.1.1 Waste. 2) Storage capacities will remain unchanged. 3) The version installed at TTF does not use a sand/salt trap. Amended point 16 found on page 15 of the Covering Document page. Filters are washed manually with water and soap. Resulting water is directed to the wastewater treatment plant. Given the small amounts this shall not affect the wastewater treatment plant.

C3.1.2	✓	Document: Covering Document - 3. Technical Details Noted	/
C3.1.3	✓	Noted	/
C3.2	N.A	Noted	/
C3.3.1	N.A	Noted	/
C3.3.2	N.A	Noted	/
C3.3.3	N.A	Noted	/
C3.3.4	N.A	Noted	/
C3.4	N.A	Noted	/
C3.5	✓	Noted	/
C3.6	x	Document: Covering Document - 3. Technical Details <ol style="list-style-type: none"> 1) If present tallow vents on the silos need to be marked as a point source (if unabated). Kindly provide indicated information and site plan. 2) In view of the introduction of the boiler listed in annex 14 it should be noted that this section should be marked as yes. 3) Kindly indicate in this section the type of emissions generate from such processes, example products of combustion etc. 	<ol style="list-style-type: none"> 1) Given the small dimension of these air vents, they cannot be considered as a source of odours. Also, these cannot be changed as they are there by design, in fact, these were present from day 1. WSM believes that the RTO and ionisers will handle the major odour loads in the plant, and the mentioned vents will contribute to minimal or zero odour. 2) Form C Amended. 3) Amended. Refer to section 4. Technical Details of the Covering Document C3.6 Emissions to Air.
C3.7	✓	Document: Covering Document - 3. Technical Details	

		Noted	/																														
C3.8	N.A	Noted	/																														
C3.9	✓	<p>Document: Covering Document - 3. Technical Details</p> <p>Noted, kindly indicate timeframes for carrying out the noise survey post-installation and commissioning of the equipment.</p>	<table><tr><th>Original Date</th><th>Resurvey Date</th><th>Scenario</th></tr><tr><td>29/10/2022</td><td>26/03/2023</td><td>Off weekend day</td></tr><tr><td>30/10/2022</td><td>24/03/2023</td><td>Off weekend night</td></tr><tr><td>02/11/2022</td><td>23/03/2023</td><td>Off weekday</td></tr><tr><td>03/11/2022</td><td>21/03/2023</td><td>Off week night</td></tr><tr><td>13/11/2022</td><td>05/03/2023</td><td>On weekend day</td></tr><tr><td>13/11/2022</td><td>03/03/2023</td><td>On weekend night</td></tr><tr><td>15/11/2022</td><td>17/03/2023</td><td>On weekday</td></tr><tr><td>16/11/2022</td><td>20/04/2023</td><td>On weeknight</td></tr><tr><td></td><td>AHUs/Ionisers started working since 19/12/22</td><td></td></tr></table> <p>As per tabulated date, the first column indicates the original survey date for all 8 scenarios. On the 21st of November 2022, the Contractor informed WSM that whilst reviewing the noise datasets that have been collected from the monitoring scenarios (as per 'original date' column), their experts noticed that the instrument experienced some unexpected and inconsistent technical faults. Subsequently, the Contractor had sent the equipment urgently to the UK to be serviced and claimed to have tried to source a replacement, but were not successful.</p> <p>As a result, some of the readings that were taken on site had to be retaken. It appears that the equipment faults were observed at some locations on the following scenarios:</p>	Original Date	Resurvey Date	Scenario	29/10/2022	26/03/2023	Off weekend day	30/10/2022	24/03/2023	Off weekend night	02/11/2022	23/03/2023	Off weekday	03/11/2022	21/03/2023	Off week night	13/11/2022	05/03/2023	On weekend day	13/11/2022	03/03/2023	On weekend night	15/11/2022	17/03/2023	On weekday	16/11/2022	20/04/2023	On weeknight		AHUs/Ionisers started working since 19/12/22	
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			<ul style="list-style-type: none"> - Weekend day OFF - Weekend night OFF - Weekend day ON - Weekend night ON - Weekday day ON
C3.10	x	Document: Covering Document - 3. Technical Details Kindly provide method statement for the monitoring of the medium combustion plant indicated in Annex 14.	Refer to Annex 14 - Method Statement for the Monitoring of Air Emissions from Autoclave.
C3.11	N.A	Kindly provide mass flow diagram.	Refer to Annex 07 – Process Flow Diagram
C4.1	✓	Document: Covering Document - 3. Technical Details Noted	/
C4.2	✓	Document: Covering Document - 3. Technical Details Noted	/
C5.1	N.A	Noted	/
C6.1	✓	Noted	/
C6.2	x	Kindly list neighboring sites	Refer to Section 4. Technical Details of the Covering Document C6.2 Other Sites
C6.3	N.A	Noted	/
C7.1	✓	Document: Annex 03- Existing Permits (PA 884/17), (PA 2303/21), (PA 2585/13 minor amendment), (PA 2585/13), (PA 08829/21) PA 2201/01, PA 3201/07, PA 5115/07 Noted, however kindly include PA 7780/22	PA 7780/22 is currently awaiting recommendation. All documentation of interest can be found on eApps.

C8.1	N.A	No change in the technically competent person is noted.	Primary TCP not changed. Given the nature of the facility ie that it operates 24/7, WSM has in the past weeks registered additional TCPs. Refer to correspondence sent to ERA on 09.01.2023 with an updated list of the primary TCP and the other TCPs.
C8.2	x	ERA understands that this should be marked as yes.	All of the TTF TCPs do not act as TCPs at other WSM sites.
C9.1	✓	Document: Covering Document - 3. Technical Details Noted, however kindly include the additional monitoring expenses due to the LPG boiler.	Refer to Section 4. Technical Details of the Covering Document. The additional monitoring expenses due to Boiler have been added in C9.1.
Other Documentation		Annex 04 Improvement Programme Update – Noted, kindly see comments in Annex II.	/
		Annex 14 : Medium combustion Plant Registration 1) Kindly submit a Warranted Engineer`s declaration/ calculation of the rated thermal input of the combustion plant. 2) Signature and date is to be provided on the declaration.	Refer to Annex 06 – Specifications & Damage (Boiler) Page 2 Table 2.5 “Thermal Output” – 3917 kW. This value is quoted from the data sheet of the equipment.