

Annex II: Feedback received following the Statutory Consultation carried out for the application of variation of Thermal Treatment Facility permit (IP 0004/07/V2) carried out between 7th December 2022 –4th January 2023

Comment received by:	Feedback	ERA reply and comment	Operator reply
External Consultees Feedback			
Environmental Health Directorate	<ol style="list-style-type: none"> 1. No water runoff, water used for washing or any litter is to exit the scheme. 2. All new equipment is to be operated and maintained according to manufacture instructions. 3. Stored rainwater is not to be used for human consumption. 4. It is highly suggested that noise and vibration levels are monitored to prevent any nuisance to the area of influence. 5. Pest Management is to be carried out in all the scheme including the Marshalling Shed. 6. The necessary mitigation measures during the construction of the Marshall Shed is to be carried out to prevent air, dust and noise pollution. 7. An SOP should be in place in the case the Odour Management System is not working including the mitigation measures to prevent any nuisance caused by excessive odours. 8. Unpredicted impacts and nuisances which may arise from this operation and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken. 9. Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested. 	Operator to take note, with respect to point 7 kindly provide.	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted. 5. Noted. 6. Noted. 7. Refer to CD Controlled Document 401 TTF Mitigation Measures for Failure of OMS_Rev00 8. Noted. 9. Noted.
Malta Resources Authority	No comments.	–	–
Planning Authority	With respect to application for a variation application of the IPPC permit (IP0004/07/C/V2) of the Marsa Thermal Treatment Facility, the PA finds no objection.	–	–
Regulatory for Energy and Water Services	The Regulator for Energy and Water Services (REWS) has been through the documents provided and we have no comments.	–	–
Civil Protection Department	No feedback provided	–	–
Water Services Corporation	<ol style="list-style-type: none"> 1) Can WasteServ give WSC a report confirming that the current Waste Water treatment plant present at MTTF has spare design capacity to be able to handle the extra load coming from the trade effluent that will be generated upon recommencing of Autoclave operations in light of past performance? 2) Improvement Plan items 33 & 34 are to be implemented in line with requirement imposed. Item 34 needs to be tackled before the autoclave starts operating in order to ensure that the quality of waste water generated by the Waste Water Treatment Plant is kept within acceptable levels. 	Operator to reply.	<ol style="list-style-type: none"> 1) WSM is in contact with WSC on this matter via a separate channel. 2) Individual drawings have been submitted to ERA in past exchanges. WSM will submit the combined drawing within 3 months of submission.

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	<p>3) WasteServ is to submit an application for the renewal of its Discharge Permit and depending on timeframes for autoclave operations, re-analysis of trade effluent will need to be performed when a change in the effluent characteristics ensues.</p>		<p>IP item 34: WSM is in the process of procuring the required monitors. The tender is currently at SPD (Ref. SPD8/2022/178).</p> <p>Estimated timeline: End of March 2023 - upload on ePPS June 2023 - signing of contract November 2023 - commissioning.</p> <p>3) WSM is in correspondence with WSC on this matter. Re-analysis of the trade effluent shall be carried out once the autoclave is operating.</p>
Occupational Health and Safety Authority	No feedback provided	–	–
The Energy & Water Agency	<p>The following are comments for The Energy and Water Agency divided by considerations which relate to specifically and solely to energy and water management.</p> <p>Energy:</p> <ul style="list-style-type: none"> Has the developer considered alternative non-fossil fuel options (such as biogas) to power the new boiler, if viable? <p>Water:</p> <ul style="list-style-type: none"> No comment 	Operator to reply	
Veterinary and Phytosanitary Regulation Division	No feedback provided	–	–
Internal Consultees Feedback			
Environmental Assessment Unit	We have no comments on these proposed variations from an environmental assessment point of view, when considering that the autoclave is an already existing facility, the proposed shed structure is not considered significant, and the odour abatement techniques aim at neutralising odours and thus reduce adverse impacts from emissions.	–	–
Biodiversity & Water Unit	No feedback provided	–	–
Air & Waste Air Quality Team	With regards to the emission inventory, the AQ team would like to request that the annual fuel burnt be split by equipment type within the AER.	This request will catered for in the AER template.	Noted.
Air & Waste Waste Management Team	<p>It is stated in the Covering Document that WSM are in discussions with the VPRD to trade the autoclave by-products. We have no comments on this as our understanding is that the output of the autoclave would be an ABP, and the final fate would then determine if its waste or not (i.e. if it is not destined to incineration/disposal, it is not waste).</p> <p>On Annex 11, this list also includes 15 01 01 (paper and cardboard packaging) and 15 01 03 (wooden packaging).</p>	<p>The intention is to update the AER template to include an annual declaration both in terms of reuse or incineration of by-products from the Autoclave.</p> <p>Operator to reply.</p>	<p>–</p> <p>Reference to 15 01 01 this code can be crossed off. The reason paper was accepted at TTF was to</p>

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	Kindly clarify the quantity of such EWC codes accepted on site, and whether this packaging would only consists of waste which is not suited for recycling? In general efforts should be made to ensure that clean/uncontaminated packaging is diverted to recycling rather than incineration.		<p>destruct sensitive documentation eg. from police/army. Going forward WSM shall opt for 20 01 01 which is better suited for such scenarios. Similarly, there are times where the police/army want to dispose off uniforms. In such case WSM shall use 20 01 10. Also, in rare occasions flags are also directed for destruction, in this case WSM shall opt for 20 01 11.</p> <p>Reference to wooden packaging, WSM wishes to retain the option of incinerating pallets to increase the temperature inside the kiln and thus regulate the process. These instances are rare as can be reviewed in past submitted AERs.</p> <p>Refer to revised Annex 11 – EWC Codes</p>
Air & Waste Noise	It is to be ensured that the upcoming noise monitoring is submitted as per current update of ToRs and eventually this is reviewed from our end as per current operations. Following that, any required mitigation measures can then be requested based on the conclusion of the noise study.	<p>1) Operator to submit noise monitoring method statement</p> <p>2) Operator to provide an indicative timeframe for the submission of the noise management plan.</p>	<p>Reference is made to the Method Statement attached.</p> <p>Noise Management Plan shall be submitted by Q4 of 2023.</p>
Compliance & Enforcement	<p>On the application documents:</p> <p>1) Annex 04 – We are in agreement with the status update provided on the IP items, however we wish to elaborate further on the status of the following:</p> <p>i. IP 26 - BAT Review document was submitted on 26/10/2022 and the referenced Performance Report submitted by WSM on 24/11/2022. The Authority has requested for IP 26 (a) and (b) to be addressed on 25/11/2022, along with a reply/report on the suggested recommendations of the technical expert.</p> <p>ii. IP 38 - WSM stated that increasing firewater retention capacity through the construction of reservoirs is not feasible as per correspondence dated 28/10/2021. It was therefore suggested that booms are used, with the Authority requesting a formal contingency plan and confirmation that such booms have been procured.</p> <p>2) Annex 05 – It is suggested that the location of boiler as shown in Annex 14 is also included in Annex 5 so as to have one site block plan showing the location of all important areas and equipment. There is no reference in the site plans to reefer storages. It is suggested that these are included as well</p> <p>3) Annex 10 – There is no reference to the containment of potential fire water. It was agreed with WSM that in this instance, since a firewater reservoir cannot be constructed, booms are implemented on site to contain the firewater from escaping the site. This should be referenced in the Emergency Responses Plan since as per page 5, CPD bases its own response on WSM's emergency plan. Therefore the use of booms should be mentioned, as these would need to be accessed from their storage at MTTF and implemented either by WSM or most probably by CPD personnel. CED has not been provided with evidence that such booms have been purchased although WSM have stated that these will be obtained for such scenarios</p> <p>Reporting:</p>	<p>On point 1-3 Operator to take note/comment accordingly. On the reporting aspects kindly <u>provide an exhaustive list</u> for inclusion in the permit.</p>	<p>1) IP 26: Air Emission Improvement Strategy was submitted to ERA on 09.02.2023.</p> <p>IP 38: Following internal discussions, WasteServ shall be discarding the 'use of booms idea' and in turn opt for diverting firefighting water to tanks on site. Further details shall be provided by end of May 2023.</p> <p>2) Refer to Annex 5 – Sit Plan (updated).</p> <p>3) Following the completion of IP 38, the ERP will be updated accordingly (target date end of June 2023).</p>

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	<div>a) There are no comments from a reporting perspective on the submission received for the AERs of 2020 and 2021. However, it is being suggested that ideally the permit includes both waste acceptance and outgoing waste codes.</div> <div>b) The facility exceeds air emission limit values denoted in the permit on the regular. Discussions on this aspects are underway.</div>		<div>a) Outgoing waste:</div> <table><tr><th>Code</th><th>Type</th></tr><tr><td>13 02 06*</td><td>synthetic engine gear and lubricating oils</td></tr><tr><td>13 07 01*</td><td>fuel oil and diesel</td></tr><tr><td>19 01 12</td><td>bottom ash and slag other than those mentioned in 19 01 11</td></tr><tr><td>19 01 13*</td><td>Fly ash</td></tr><tr><td>20 01 39</td><td>Plastics</td></tr><tr><td>20 01 40</td><td>Metals</td></tr><tr><td>20 03 07</td><td>Bulky</td></tr></table>	Code	Type	13 02 06*	synthetic engine gear and lubricating oils	13 07 01*	fuel oil and diesel	19 01 12	bottom ash and slag other than those mentioned in 19 01 11	19 01 13*	Fly ash	20 01 39	Plastics	20 01 40	Metals	20 03 07	Bulky
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TFS permitting	There are no comments from a TFS permitting perspective.	—	—																