

Comments regarding the renewal and variation of the IPPC permit for Metalco Ltd.

Form A

Section	Duly made?	ERA Comments – February 2019
A1.1	✓	Noted.
A1.2	✓	Noted.
A1.3	✓	Noted
A1.4	✓	Noted.
A2.1	✓	Noted.
A2.2	✓	Noted.
A3.1	✓	Noted.
A3.5	✓	Noted.

Form C

Section	Duly made?	ERA Comments – February 2019	Comments by Metalco Ltd.	ERA Comments – May 2019	Comments by Metalco Ltd.	ERA Comments – October 2019	Comments by Metalco Ltd.	ERA Comments – February 2020	Comments by Metalco Ltd.
					<p>The activities for the extended area towards the northwest of the site have been updated. Since the Planning Authority will not allow construction of permanent structures, this land will be used solely for parking purposes. Therefore, ELVs, fridges, CRTs and LCDs will not be stored or processed on site. The IPPC variation application has been updated in light of these changes.</p>	Noted.			/

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C1.1	✓	Noted.	/			Kindly remove any references to activities which will not be taking place on site, from the directly associated activities table. Kindly clarify if shredding of food waste is intended to take place. If this is so kindly update all the application and associated report accordingly.	Noted and amended.	Noted.	/
C1.2	✓	Noted.	/						
C1.3	✓	Noted.	/						
C1.4.1	x	Operator is to submit an amended method statement for the land and groundwater baseline survey (in line with ERA's requirements in the e-mail dated 18.12.2018.). This shall also include description and sampling locations for the extension, and the quarry which is proposed to be backfilled in this variation. To note that backfilling of the quarry shall not commence until the baseline survey is carried out, the results are reviewed and go-ahead is given by ERA.	Submitted.	Document was not sent with these submissions. Kindly submit this document.	The baseline survey is being carried out by Dr George Peplow. The comments have been passed onto him, so kindly address future correspondence to him.	Consultant will be included in all correspondence related to the baseline survey, however before the updated method statement as required is received, C.1.4.1 cannot be considered duly made.	Noted and submitted.	An updated method statement was received by the ERA on 18 th February 2020. Comments on this were sent separately.	Noted. Updated method statement attached.
C1.4.2	✓	Operator to submit an official site plan clearly showing the operational site boundaries (as agreed	The drawings have been updated in accordance with the ERA letter.	Noted. Noted.	/				

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		<p>between Metalco and DDE Attard).</p> <p>The site plan provided in section 3.2 page 7 is not in agreement with the plan in page 10. Kindly submit plans that show clearly the boundary for onsite operations.</p>	<p>The site plan in page 10 considers the entire site, while the site plans in page 7 and 8 refer to two planning applications relating to two portions of the site (extension to DDE land and quarry, respectively). When combined, the plans in page 7 and page 8 produce the plan in page 10.</p>						
C1.4.3	✓	<p>Kindly revise site layout plan on page 10 to reflect realistic processing space requirements for all activities proposed in this variation considering the processes and activities described in Section C2.2.1 below. This is in view of the observations made during ERA inspection carried out on site on 28.08.2018.</p> <p>Two separate ELV dismantling areas are identified in Site Plan 3.3 (Figure 4 pg 10). Applicant to clarify which dismantling activities are to take place in each area, particularly in view that one of the identified areas is</p>	<p>No updates to the plans are necessary. Taking into consideration that the site layout is going to increase by approximately 4,400sqm, new activities will be carried out in the new area. This would help the operators to better organise their original area.</p> <p>The site plan has been updated accordingly.</p> <p>A workshop will be constructed as part of the pending Planning Application, allowing this activity to be carried out indoors.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	/	/	/		

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		<p>outdoors.</p> <p>Figure 5 pg 11 identifies an outdoor location for the fridge processing equipment. This should be located indoors.</p>							
C2.1	✓	Noted.	/						
C2.2.1	✓	<p>All wastes generated on site is not considered to be of municipal origin and thus cannot be classified under chapter 20 of 2014/955/EU and are therefore to be classified with the EWC code indicating the origin of the waste. The final facilities accepting such waste are to be revised accordingly.</p> <p>Table 13 (ELVs):</p> <p>Operator is to provide an authorisation from REWS to operate the fuel dispensing facilities. When the required standards are not currently achieved, an engineer's report showing the proposed improvements and associated time-frames is required. This is also to include</p>	<p>Kindly note that the wastes listed under chapter 20 include municipal waste (household waste and similar commercial, industrial and institutional wastes). The wastes listed in Section 5.1.2 of the report refers to the classification according to waste origin. No updates are necessary.</p> <p>The majority of the machinery proposed in the new IPPC application has not yet been purchased since the Planning Application for the extension of the site is still pending. Registration with REWS will be carried out once complete. Kindly include in the improvement programme of the permit.</p>	<p>As stated in original comment, kindly note that this comment refers to waste generated on site as listed in table 17 as part of section 5.2 as opposed to incoming waste streams. Kindly refer to original comment and update accordingly.</p> <p>Kindly note that operations of fuel dispensing facilities might require to be covered with specific provisions as provided by the Regulator for Energy and Water Services (REWS).</p> <p>Noted. Acceptance and dismantling of LPG-driven ELVs will not be permitted on site.</p> <p>Noted.</p>	<p>Noted and amended.</p> <p>Noted. We await further guidance</p> <p>N/A since ELVs will not be stored/processed on site in accordance with the latest update.</p>	<p>Noted.</p> <p>Operator is to contact the Regulator for Energy and Water Services. Contact details: https://www.rews.org.mt/#/contact</p> <p>Noted.</p>	<p>Registration has already been done. Proof has been submitted.</p>	<p>Noted.</p>	

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		<p>calculations as to whether the bund capacity achieves at least 110% of the capacity of the diesel tank and how any fill-points are contained within the bund.</p> <p>Operator is to also confirm whether it is proposed to treat LPG driven ELVs on site. If this is the case, the process flow diagram is to be amended to reflect this activity.</p> <p>Kindly provide a detailed method statement, with step-by-step breakdown for the following activities: depolluting, dismantling and shredding of ELVs. This shall include amongst others: clarifications whether ELVs to be shredded are proposed to include glass, waste tyres, seatbelt pretensioners, airbags and upholstery. Operator is to indicate how he shall ensure that any waste inputted into the shredder shall not contain any brominated flame retardants or indicate</p>	<p>LPG-driven ELVs will not be processed on site. Therefore, no edits have been made to the process flow diagram.</p> <p>Noted and included in Table 13 of the report.</p> <p>These materials will be removed manually prior to the use of the ELV processing machine. The waste materials will be processed according to their respective waste fractions</p> <p>This is not available at this stage since the activity has not begun on site. Kindly include</p>	<p>Noted.</p> <p>Kindly provide calculations estimating how the process shall reach these targets considering the available/proposed equipment and market estimates. Provide a timeframe for the submission of the documentation related to the ELV machine and the installation. Kindly note that ELV dismantling operations will be subject to approval of this documentation.</p> <p>Noted.</p> <p>Table 13 states 5000T will be processed annually, while table 17 states that 4000T of waste will be produced annually. Kindly</p>	<p>/</p> <p>/</p> <p>N/A since ELVs will not be stored/processed on site in accordance with the latest update. N/A since no ELV processing machine will be installed on site, in accordance with the latest update</p> <p>/</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>			

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		<p>how any such waste shall be separated from the rest and disposed of accordingly as hazardous waste.</p> <p>Furthermore, kindly provide details on the technology employed in order to separate: glass, waste tyres/rubber and upholsters fractions from the shredding process for further separate dedicated treatment off-site.</p> <p>This shall include calculations showing how the proposed process shall reach the relevant re-use and recycling targets in accordance with S.L. 549.36, Waste Management (End of Life Vehicles) Regulations.</p> <p>Kindly provide full operator's manual document in Appendix III for the ELV Processing Machine. (for pre-shredding operations)</p>	<p>in the Improvement Programme of the permit.</p> <p>Kindly include in the Improvement Programme of the permit.</p> <p>Estimated 19 tonnes per day.</p> <p>Noted and amended.</p> <p>1. This information is not yet available since these activities are not currently carried out on site. Kindly include in</p>	<p>account for the discrepancy.</p> <p>These details are to be provided prior to start of CRT/LCD dismantling operations.</p> <p>These details are to be provided prior to start of CRT/LCD dismantling operations.</p> <p>Noted.</p> <p>These details are to be provided prior to start of CRT/LCD dismantling operations.</p> <p>Kindly provide calculations estimating how the process shall reach these targets.</p>	<p>N/A since ELVs will not be stored/processed on site in accordance with the latest update.</p> <p>N/A since CRTs and LCDs will not be stored/processed on site in accordance with the latest update.</p> <p>N/A since CRTs and LCDs will not be stored/processed on site in accordance with the latest update.</p> <p>/</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>			

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		<p>With reference to the maximum storage capacity of untreated ELVs and annual throughput provided, applicant is to provide further details on the projected ELV daily treatment capacity (in tonnes per day) of the proposed plant.</p> <p>Applicant is to further clarify why the projected annual treatment quantities of ELVs, CRTs/LCDs, Fridges and food waste as identified in Tables 13, 14, 15 and 16 respectively do not tally with the totals for wastes and rejects for the same waste streams identified in Table 17; as it is assumed that all incoming waste will eventually be outgoing</p> <p><u>Table 14 (LCD/CRT screens):</u></p> <p>Kindly provide a detailed method statement with step-by-step breakdown for dismantling of CRT/LCD screens including but not limited to the following</p>	<p>the Improvement Programme of the permit.</p> <p>2. This information is not yet available since these activities are not currently carried out on site. Kindly include in the Improvement Programme of the permit.</p> <p>3. The wood and other non-hazardous materials will be removed first prior to any other processing activities. This is done to minimise the likelihood of contamination of these materials.</p> <p>Kindly include in the Improvement Programme of the permit since the machinery has not yet been purchased.</p> <p>This information is not yet available since these activities are not currently carried out on site. Kindly include in the Improvement Programme of the permit.</p>	<p>Noted.</p> <p>Fridge dismantling operations may not take place prior to the submission of:</p> <ol style="list-style-type: none"> 1. The operator’s manual document in Appendix III for the Fridge Processing Machine for pre-shredding operations) 2. A detailed method statement for dismantling of fridges in line with Schedule 7 of S.L. 549.89. including but not limited to: <ol style="list-style-type: none"> a. How any parts containing coolant gases and insulating foams are managed and how it shall be ensured that these remain intact throughout the process or how the refrigerant they contain is extracted/separated during the dismantling process. 	<p>N/A since CRTs and LCDs will not be stored/processed on site in accordance with the latest update.</p> <p>N/A since CRTs and LCDs will not be stored/processed on site in accordance with the latest update.</p> <p>N/A since fridges will not be stored/processed on site in accordance with the latest update.</p> <p>N/A since fridges will not be stored/processed on site in accordance with</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>			

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		<p>information: 1. Method of removal of embedded phosphor powder 2. How any potential emissions of heavy metals resulting from the process shall be filtered or contained. 3. Clarification how it shall be ensured that any wood resulting from this process shall not contain any hazardous substances.</p> <p>Kindly provide technical specifications for: the dust filters, dust separators proposed for such shredding activities and the “electrical waste dismantling equipment”.</p> <p>Kindly include calculations showing how the proposed process shall reach the relevant targets in accordance with Schedule 5 of S.L. 549.89.</p> <p><u>Table 15 (fridges):</u></p> <p>With reference to figure 4 of section 3.3</p>	<p>Noted and amended.</p> <p>Kindly include in the Improvement Programme of the permit since the machinery has not yet been purchased.</p> <p>1. As discussed on the phone on 22/03/2019, the machine has not yet been purchased. The applicant is considering machines which separate and pack coolant gases and insulating foams automatically within the machine itself.</p> <p>2. Kindly include in the Improvement Programme of the permit since the machinery has not yet been purchased.</p>	<p>b. Technical specifications of the air purification system in place, to prevent escape of refrigerants, during the dismantling process.</p> <p>These details are to be provided prior to start of Fridge dismantling operations or within a time-frame proposed by the operator for inclusion in the Improvement Programme.</p> <p>Kindly provide calculations estimating how the process shall reach these targets as requested in the previous comment.</p> <p>Noted.</p> <p>Kindly note that destruction of food waste is still used in Sections 2.0, 3.1 & 5.1.2.</p>	<p>the latest update.</p> <p>N/A since fridges will not be stored/processed on site in accordance with the latest update.</p> <p>/</p> <p>N/A since fridges will not be stored/processed on site in accordance with the latest update</p>	<p>Previously sections had been amended to refer to shredding of food waste, whereby this activity has been completely removed from the whole “Form C Report V3.0”. It is therefore being understood that this activity will not take place on site. Kindly clarify also with respect to question in 1.1 above.</p> <p>As stated above shredding/destruction of food waste is not seen in the document. Kindly confirm if this activity will not take place on site.</p>	<p>Noted and amended.</p> <p>Confirmed</p>	<p>Noted.</p> <p>Noted.</p>	

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		<p>and the requirements of schedules 7 and 8 of the WEEE Regulations SL 549.89 kindly provide designated areas for storage of fridges before processing which is adequate for the storage of the quantities being proposed in this application.</p> <p>Kindly provide full operator’s manual document in Appendix III for the Fridge Processing Machine. (for pre-shredding operations)</p> <p>Kindly provide a detailed method statement for dismantling of fridges in line with Schedule 7 of S.L. 549.89. including but not limited to: 1. How any parts containing coolant gases and insulating foams are managed and how it shall be ensured that these remain intact throughout the process or how the refrigerant they contain is extracted/separated during the dismantling process.</p>	<p>This information is not yet available since these activities are not currently carried out on site. Kindly include in the Improvement Programme of the permit.</p> <p>The food waste processed on site is counterfeit and/or expired materials. Some food waste arrives to the site without packaging, and is processed accordingly. Food waste with packaging is manually separated and the packaging is processed according to its respective waste stream, including paper, cardboard,</p>	<p>Kindly indicate where in the document these are being included as only a comment in section 3.7 below is noted with respect to food odour emissions</p>	<p>/</p> <p>Noted and amended.</p> <p>Apologies. The abatement techniques have now been included in Section 13.0 of the Form C report.</p>				

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		<p>2. Technical specifications of the air purification system in place, to prevent escape of refrigerants, during the dismantling process.</p> <p>Kindly include calculations showing how the proposed process shall reach the relevant targets in accordance with Schedule 5 of S.L. 549.89.</p> <p><u>Table 16 (food waste):</u></p> <p>Kindly specify main sources and constituents of such waste streams, including the potential types of packaging materials and how such packaging shall be separated prior to shredding of the</p>	<p>plastic and glass as relevant. All incoming food waste is recorded, as discussed in BAT 5.</p> <p>Noted and amended.</p> <p>Noted and amended.</p>						

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		<p>biodegradable fraction. Additionally further information on the origin of such waste is to be provided including details of how such origins shall be verified.</p> <p>Kindly note that “destruction” is not an appropriate term for the shredding of such waste, kindly propose an alternative as defined in Waste Treatment Industries BREF, 2018.</p> <p>Kindly propose odour abatement techniques to be used for this process according to the Waste Treatment Industries BREF, 2018.</p>							
C2.2.2	✓	Noted.	/						
C2.2.3	✓	EWC codes and quantities for all incoming and outgoing waste streams are to be indicated in the flow	Noted and amended.	Updates to Process flow diagrams noted, however please refer to comment on waste codes in 2.2.1 and ensure that these are similarly updated.	Noted and amended.	Noted.			

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		diagram. Kindly provide separate detailed flow diagrams for each of the newly proposed waste treatment activities also indicating the final disposal facilities.							
C2.2.4	✓	Refer to attached BAT comparison review and update the submitted BAT comparison document accordingly.	Noted and amended.	A 2 nd BAT review is attached. Kindly update and submit accordingly.	Noted.	Noted.			
C2.2.5	✓	In view of new waste management facilities being proposed alternatives have not been provided.	The original application stated: “No alternatives were considered in the technology, techniques and measures since the current status of the installation complies with BAT with regards to the storage of hazardous waste, separation and segregation of waste, and shredding and baling operations.” The new machinery which has already been purchased and those which are yet to be purchased comply to relevant BAT standards. Therefore, no alternatives are applicable.	More than one BAT compliant option may exist for each process and thus it is difficult to ascertain that the proposed processes are compliant with BAT standards when no details of various machinery for the new processes is not supplied or known. Kindly provide alternatives and associated justification for alternatives that were/are not selected.	Noted and amended.	Noted.			
C2.3	✓	Noted.	/						
C2.4	✓	Noted.	/						

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C2.5	✓	Noted.	/						
C2.6	✓	Noted.	/						
C2.7	✓	If water dousing is used in new shredding the water consumption will increase, therefore this section needs to be revised accordingly or a justification provided for the statement that no changes to water consumption is applicable. Additionally Figure 6 shows that silt traps, oil cesspits and rain water reservoirs will be added to the site kindly justify the statement that no waste water facilities will be changing.	Noted and amended.	Noted.	/				
C2.8	x	Appendix V - Environmental risk assessment and risk assessment reports by ECL consulting: The reports are to be amended to include potential environmental effects of the newly proposed activities in the variation (also including past and current activities being carried out in the area of the quarry). The conclusion of the Environmental risk	This information is not yet available since these activities are not currently carried out on site. Kindly include these requirements in the Improvement Programme of the permit.	New activities will not be permitted until all details are provided to the satisfaction of the Authority.	Kindly include in the Improvement Programme of the permit.	In view of the extension of the permit till June 2020 and that the comments to be implemented date to 2015, the updated risk assessment is to be submitted for section C2.8 to be considered duly made. Such Risk Assessment is required for the compilation of the baseline survey method statement and actual sampling referred to in C1.4.1 above.		This section is still to be updated as previously requested.	The Risk Assessment and Environmental Risk Assessment reports were already updated in the last version of the application (dated 18 th November 2019). These have been revised again on the basis of statutory consultation comments.

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		<p>assessment report is to be amended in line with the Authority’s comments dated 9 July 2015:</p> <p>“Based on the historical uses of the site for the melting of aluminum and burning of wires, along with the other general scrapyards activities which took place on ground which was not covered with impervious material; the Authority has determined that there is potential historical contamination of the site; hence a baseline study is required. The rationale behind this requirement is to determine the state of land contamination so as to make a quantified comparison with the state upon definitive cessation of activities. Prior to commencement of the survey, a method statement based on the information detailed in ‘Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU’ should be submitted to the</p>							

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		<p>Authority for approval.</p> <p>Guidance provided by ERA’s e-mail dated 18.12.2018. is to be followed in this regard as stated in section C.1.4.1 above.</p> <p>Please note that storage of fuel, diesel and lubricating oils should also be included in the final version of the report to be submitted as part of the consolidated application; however this does not effect the Authority’s decision on the requirement of a baseline study.”</p> <p>Kindly note that there are contradicting statements on page 2 of the Environmental risk assessment report and page 4 of the risk assessment report regarding secondary fuel storage facilities on site and presence of dispensers. Kindly clarify.</p> <p>The updated Risk assessment is to take into consideration the projected storage and stacking methods,</p>							

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		capacities and heights of all incoming and outgoing waste streams. Appendix A – site plan is to be amended to include areas covered by the current proposal. Kindly provide documentation proving that any fuel storage and dispenser facilities on site are adequately registered with REWS. In this regard, kindly also refer to ERA’s comments in section C2.2.1.							
C2.9	✓	Details on training for the new waste management processes has not been submitted. Kindly provide details for this.	Noted and amended.	Noted. Training certificates are to be provided prior to the commencement of all proposed operations concerning treatment of ELVs and WEEE.	N/A since no new WEEE will be processed on site, in accordance with the latest update.	Noted.			
C2.10	✓	Noted.	/						
C2.11	✓	Noted.	/						
C3.1.1	✓	Noted.	/						
C3.1.2	✓	Details on changes to storage arrangements need to be provided to the ERA to justify the 6 fold increase of waste storage space being proposed. This needs to be reflected in submitted plans	No changes to site plans are applicable. The quantities provided in the original IPPC application were dependent on the amounts processed on site at the time. The existing storage space already caters for a large	Noted.	/				

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			portion of the proposed quantities. Furthermore, the storage space for the proposed extension is sufficient to cater for all the proposed activities to be carried out on site.						
C3.1.3.	✓	Noted.	/						
C3.2	✓	Noted.	/						
C3.3.1-3.3.3.	✓	Noted.	/						
C3.3.4.	✓	Kindly provide description and certification of new cesspits in line with SL 549.45 (Activity 43).	Kindly include in the Improvement Programme of the permit, since the cesspits have not yet been installed.	In the case were these cesspits are not yet installed, plans and sections for the cesspit are to be submitted showing that they shall be constructed in accordance with SL 549.45, Activity 43 as per the below conditions: <ol style="list-style-type: none"> 1. Cesspits are to be constructed in such a manner so as not to allow any leakages or spillages to the surrounding environment, and are designed in such a manner as to safely contain the type of waste that they are designated to store. 2. Cesspits are appropriately designed to avoid the accumulation of explosive, toxic or corrosive gasses. 3. The area surrounding the cesspit should be covered with impervious material and laid to fall towards the cesspit. Time-frames by when the	N/A since no cesspits will be installed in the extended area, in accordance with the latest update.	Noted.			

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				cesspits shall be duly constructed and certified are to be provided for inclusion in the Improvement Program.					
C3.4	✓	Noted .	/						
C3.5	✓	Applicant is to specify the final disposal for collected sludges and sediments in the silt traps and oil cesspits. Moreover applicant is to clarify whether the oil cesspits will be equipped with any waste treatment equipment such as an oil water interceptor.	This waste will be collected by EJ Mangion who are authorised to collect this waste (GBR/12/01176/17). The Consignment Permit procedure will be abided to. Waste treatment procedures are included in Section 12.0 of the report.	Noted.	/	Queries regarding potential trade effluent discharges in section C5.1 below refer.			
C3.6	x	In relation to new machinery with possible emissions to air (e.g. having a combustion engine, escape of CFCs from processing of fridges, etc.) referred to in section 5.1.3 information on emissions to air is to be provided. Moreover information on any increase in emissions for current machinery in view of increasing processing volumes is also to be provided, For all combustion machinery on site (e.g. shredders, crushers, generators, etc.) the following	Noted and amended. Noted and amended.	No detail has been provided for emissions from fridge processing machine and CRT/LCD processing. Kindly provide details for how powder and mercury emissions from CRT/LCD processing and CFC emissions from fridges will be mitigated. Kindly note that Rated thermal input in MW(th); fuel type and details on fuel storage and average load in use is to be supplied for all combustion machinery on site (planned and current) prior to the issue of the permit. Kindly note that any equipment falling within scope of the MCP regulations SL 549.122, will be subject to registration and associated payments.	N/A since fridges and CRTs/LCDs will not be processed on site in accordance with the latest update. Noted and amended.	Noted. The provided rating refers to the power output, not the total energy of fuel incinerated as required by SL 549.12. Rated Thermal input is to be provided in megawatts thermal (MW _{th}). Kindly update accordingly.		/	This section is still to be updated as previously requested. Noted and included.

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		details are to be provided Rated thermal input in MW(th); fuel type and details on fuel storage; average load in use and estimated annual hours of operation.							
C3.7	✓	In view of the proposal to add shredding of food waste operator needs to justify the statement that odour emissions will not be relevant for such activities.	Food processing and storage will be carried out indoors, and the door to this area will be closed at all times. Furthermore, since food waste tends to biodegrade very quickly, only small quantities will be brought to the site at any time, and it will be stored on site for a very short time (maximum 8 hours). Therefore, odour emissions are not expected to be an issue for concern.	Noted.	/				
C3.8	✓	Applicant is to clarify if a geotextile membrane will be applied below the surface asphalt for any new hardstanding areas and indicate if there is any geotextile membrane beneath the current hardstanding areas.	Confirmed. There is a geotextile membrane underneath existing hardstanding and another will be included underneath the proposed hardstanding areas.	Noted.	/				
C3.9	✓	Noted. Kindly note that as part of the new	Noted.	Monitoring will be requested as an improvement programme	Kindly advise whether this is	A noise monitoring survey will be required to be conducted following	Noted.	/	

Section	Duly made?	ERA Comments – February 2019	Comments by Metalco Ltd.	ERA Comments – May 2019	Comments by Metalco Ltd.	ERA Comments – October 2019	Comments by Metalco Ltd.	ERA Comments – February 2020	Comments by Metalco Ltd.
		permit a noise monitoring study will be required.		item.	applicable in light of the minimal changes to the original IPPC permit.	the issue of the IPPC permit. The frequency of monitoring will be determined following submission of noise monitoring results.			
C3.10	✓	Noted. Depending on information provided in reply to comments in section C3.6 above further monitoring may be required.	We await further guidance.	Monitoring will be requested as an improvement programme item, and details will depend on a full answer to section 3.6.	Noted.				
C3.11	✓	Refer to comments in section C.2.2.3	Noted.	Noted.	/				
C4.1	✓	Noted.	/						
C4.2	✓	Refer to comments in Section C.3.7	Noted.	Noted.	/				
C5.1	✓	In terms of EIA, a conclusion as to whether further studies will be required cannot be determined until such time that ERA received a reply to requests in doc 53A for PA 9599/17.	Noted.	Previous comment still applies.	Kindly advise whether this is applicable in light of the minimal changes to the original IPPC permit.	Doc 53a refers to questions with regards to the entire site. Kindly provide a reply to this document. In view of the changes to storage locations on site as seen in Fig 2 of “Form C Report V3.0”, the applicant is to submit an updated drainage plan showing how potentially contaminated run off from proposed “Scrap material” storage areas shall be managed in accordance with BAT conclusions. This shall include a description of the nature of the scrap material including how this is determined.	Kindly note that PA 9599/17 has been withdrawn by the applicant. This is no longer applicable.	Noted.	
C6.1	✓	Noted.	/						
C6.2	✓	Noted.	/						
C6.3	✓	Noted.	/						
C7.1	✓	Kindly include reference to PA 1030/18 - Backfilling of existing quarry and any other relevant planning applications.	Noted and amended. Noted and amended.	Noted.	/				

Section	Duly made?	ERA Comments – February 2019	Comments by Metalco Ltd.	ERA Comments – May 2019	Comments by Metalco Ltd.	ERA Comments – October 2019	Comments by Metalco Ltd.	ERA Comments – February 2020	Comments by Metalco Ltd.
		Additionally kindly note that PA 9599/17 is listed as 9559/17 in application. Kindly update accordingly.							
C8.1	✓	Noted.	/						
C8.2	✓	Noted.	/						
C9.1	✓	Expenditure plan to consider costs arising from the new BAT assessment, associated monitoring and Land and Groundwater testing. Air/water/noise monitoring plans as required by BAT are to be provided as part of these replies.	The Expenditure Plan includes provisional costs for all the monitoring exercises. Therefore, no updates to the Expenditure Plan are necessary.	Kindly note that the proposed variation and BAT assessment will require revised monitoring plan and such associated costs are to be considered accordingly.	Noted and amended.	Noted.			