

Annex I – ERA Comments regarding the renewal of the IPPC permit for Gasparell Baling Co. Ltd.

**Form A**

Section	Duly made?	Comments 2017
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 16.11.2017.	Comments by Gasparell Baling Co. Ltd.	ERA comments 30.01.2018.	Comments by Gasparell Baling Co. Ltd.	ERA comments 20.02.2018
C1.1	✓	Noted.				
C1.2	✓	Noted.				
C1.3	✓	Noted.				
C1.4.1	✓	Noted. Regarding the baseline report, kindly refer to comment in C2.8.	Refer comment C 2.8	Noted.		
C1.4.2	✓	Noted.				
C1.4.3	✓	Kindly submit.		Noted.		
C2.1	✓	Noted.				
C2.2.1	✓	Noted.				
C2.2.2	✓	Noted.				
C2.2.3	✓	Noted.				
C2.2.4	✓	Noted. Review attached.		Noted. 2 <sup>nd</sup> review attached.		
C2.2.5	✓	Noted.				
C2.3	✓	Noted.				
C2.4	✓	Noted.				
C2.5	✓	Noted.				
C2.6	✓	Noted.				
C2.7	✓	Noted.				
C2.8	✓	Noted. While ERA notes the conclusion of the risk assessment carried out for the area of the extension that no additional land and groundwater investigations have to be carried out for the new area, kindly note that ERA reiterates its position that land tests are required on site so as to assess the baseline scenario. This is in view that land and risk assessment	Your comments show that you haven't understood much how the risk assessment was carried out and you are quoting two sections out of context. The sections you are quoting refer to the scenario where no protocols and mitigation measures are applied, which is not the case. If you	Kindly note that background concentrations of all contaminants determined in the original baseline survey are to be also considered as the	Agreed	Noted.

		<p>document, particularly sections 4.1.2.3 and 4.1.3.3 raise serious concerns on the magnitude of consequences of the current operations on site on the state of the land. This is of relevance in view that the proposal will be an extension of the current operations.</p> <p>In the light of the above, a clear rationale as to why it is being deemed that no land tests are required needs to be provided, especially in view that tests would need to be carried out at site closure phase which would then need to be compared to some form of baseline scenario.</p> <p>In view of this the operator would have no other option but to apply the results of land tests on the current site as the baseline. Kindly note that the land and groundwater investigations to be carried out after cessation of activities on site will have to cover to whole site area. Additionally kindly note that background concentrations of all contaminants determined in the original baseline survey are to be also considered as the baseline concentrations for potential remediation activities for the entire site area.</p> <p>Regarding Appendix I of the risk assessment, kindly note that The <b>ELV Equipment.pdf</b> link does open the indicated document. Kindly submit such pdf document in soft and hard copy.</p>	<p>look at the appraisal following the mitigation measures in the summary table then you would realise that your assumptions are invalid. We maintain that there is no need for any further boreholes to be carried out a few metres away from those originally done for the same reasons which have already been stated previously.</p> <p>Note that none of the sections indicated have been changed from the original document submitted with the original application.</p> <p>The baseline used when and at the time the site would close would be the same baseline obtained from the original tests.</p> <p>Although you stated that you could open the document I presume that you meant otherwise. So requested document which is the same which was presented at the time of the application is enclosed.</p>	<p>baseline concentrations for potential remediation activities <b>for the entire site area</b> in case the operator doesn't intend to carry out further land testing. Kindly confirm whether the Operator is in agreement with the above.</p>		
C2.9	✓	Noted.				
C2.10	✓	Noted.				
C2.11	✓	Noted.				
C3.1.1	✓	Noted.				
C3.1.2	✓	Noted. Kindly describe how the new geotextile layers shall be installed and adjoined with the existing layers to ensure impermeability.	When the original geotextile was laid and covered with concrete, they had left a large part all around the area which was left uncovered so that in the eventuality of any extension, the exposed layer could be used for continuous overlap with the new layer thus preventing any possibility of	Noted. Kindly note as part of the Improvement Programme within the Permit, the Operator will be required to submit a certification by an independent	Architect will submit such a certification when requested and once works are completed	Noted.

			infiltration due to the fact that the concrete floor would have been laid during different periods.	warranted civil engineer or engineer that the engineered site containment and drainage systems related to the extension are leak-proof and resistant to physical, mechanical and chemical stresses to which they may be subjected.		
C3.1	✓	Noted.				
C3.2	✓	Noted.				
C3.3	✓	Noted.				
C3.4	✓	Noted.				
C3.5	✓	Noted.				
C3.6	✓	Noted.				
C3.7	✓	Noted.				
C3.8	✓	Noted.				
C3.9	✓	Noted.				
C3.10	✓	Noted.				
C3.11	✓	Noted.				
C4.1	✓	Noted.				
C4.2	✓	Noted.				
C5.1	✓	Noted.				
C6.1	✓	Noted.				
C6.2	✓	Noted.				
C6.3	✓	Noted.				
C7.1	✓	Noted.				
C8.1	✓	Noted.				
C8.2	✓	Kindly mark appropriate box.	done	Noted.		
C9.1	✓	Noted.				

**Additional comments:**

1. While document 88f “14045-Bailing Plant extension, Hal Far - surface runoff water aug 2017” uploaded to eApps under PA/03240/15 is being noted - this would also need to be submitted in the consolidated version of the IPPC renewal/variation application for public consultation.

Enclosed but please note that I only saw document when I downloaded it from the PA webserver since it was the architect who uploaded it! – Noted.

**ERA feedback regarding comparison with BAT conclusions (from Waste Treatment Industries BREF document).**

<b>Part 1: Generic BAT</b>				
<b>Aspect of BAT</b>	<b>ERA comments 16.11.2017.</b>	<b>ERA comments 30.01.2018.</b>	<b>Replies by Operator 02.02.2018.</b>	<b>ERA comments 22.02.2018.</b>
<b>Environmental management system (EMS)</b>	Reference shall be made to the respective section(s) of the IP application form for each relevant subsection of this aspect: e.g. B2.1.	Noted.		
<b>Activities carried out</b>	Reference shall be made to the respective section(s) of the IP application form for each relevant subsection of this aspect or kindly indicate if subsection is not relevant for the facility.	<p>The reply shall be revised as per the example below:</p> <ul style="list-style-type: none"> <li>• descriptions of the waste treatment methods and procedures in place in the installation – <b>B1.2</b></li> <li>• diagrams of the main plant items where they have some environmental relevance – <b>B1.4.3a, B1.4.3b</b> together with process flow diagrams (schematics) – <b>B2.3</b></li> <li>• details of the chemical reactions and their reaction kinetics/energy balance – <b>kindly indicate that this is not applicable</b></li> <li>• details on the control system philosophy and how the control system incorporates the environmental monitoring information – <b>kindly indicate whether this is applicable, and include references/description</b></li> </ul>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Not applicable</p> <p>Not applicable</p>	Noted.

		<p><b>as necessary</b></p> <ul style="list-style-type: none"> <li>• details on how protection is provided during abnormal operating conditions such as momentary stoppages, start-ups, and shutdowns – <b>kindly confirm what measures in place for the baler and are planned for the shredder once it is operational</b></li> <li>• an instruction manual - <b>kindly indicate whether this is applicable, and include references/description as necessary</b></li> <li>• an operational diary (related to the next aspect) - <b>kindly indicate whether this is applicable, and include references/description as necessary</b></li> <li>• an annual survey of the activities carried out and the waste treated. The annual survey should also contain a quarterly balance sheet of the waste and residue streams, including the auxiliary materials used for each site (related to the EMS aspect). – <b>Operator is to refer to the Submission of AERs.</b></li> </ul>	<p>Kindly clarify what is needed. Protection of what? The machines are turned on and off according to the scheduled programme of works for the day. A machine might be used for a few hours or minutes and then stopped. Another machine might be used for a number of hours, much depends of the works which need to be done and the incoming waste and also on whether waste is being transferred to the port for loading.</p> <p>Machines usually have instruction manuals</p> <p>Kindly clarify what is needed. The operations on site have been clearly stated a thousand times. They are the operations for which a permit has been issued.</p> <p>There is only one site which is operational and an annual AER is submitted</p>	
<b>Housekeeping</b>	Reference shall be	Noted.		

<b>procedure</b>	made to the respective section(s) of the IP application form for this aspect.			
<b>Relationship with waste producer/holder</b>	Kindly include an explanation as to how it is ensured that waste received on site is of the required quality, and how this is communicated with the waste producers.	Noted. The Operator shall ensure and will be requested to as part of the IPPC Permit to ensure that the incoming waste is not contaminated with any material that cannot be accepted on site.	All incoming waste is visually inspected and any waste which should not be accepted on site is immediately refused and waste producer is asked to leave site immediately with all unauthorised waste material	Noted.
<b>Staff</b>	Reference shall be made to the respective section(s) of the IP application form for this aspect.	Noted.		
<b>Waste IN Knowledge</b>	Noted. Kindly include reference to the AERs.	Noted.		
<b>Waste IN Pre-acceptance procedure</b>	Noted. Kindly include a description of the pre-acceptance procedures on site (of which records are being kept).	Noted.		
<b>Waste IN Acceptance procedure</b>	Noted. Kindly indicate how it is ensured that sufficient capacity is available on site.	Noted.		
<b>Waste IN Sampling procedures</b>	Noted.	-		
<b>Waste IN Reception facility</b>	Reference shall be made to the respective section(s) of the IP application form for the bullets marked with the reply "in place".	Noted.		
<b>Waste OUT Analysing</b>	Kindly provide details of the analysis carried out with practical examples.	Noted.		
<b>Management systems</b>	Kindly provide a reasoning why most of	Points 2-5: certain aspects related to record	Note that it has already been stated that NO WASTE TREATMENT takes	Noted.

<b>Traceability</b>	the aspects referred to in this BAT conclusion are deemed as not applicable to operations carried out on site. Also kindly include reference to the record keeping mechanism of the certificates of destruction.	keeping are deemed as being applicable to the operations on site. Conditions in this regard will be included in the Permit.  Also kindly include reference to the record keeping mechanism of the certificates of destruction.	place on site hence section is not applicable in this regard.  I am informed by client that ERA already has evidence of the record keeping mechanism in place since they have seen it during inspections. This is in a form of a three copy system whereby details of each vehicle which is destroyed are recorded, two copies are given to owner and one copy is kept at the office.	
<b>Management systems Mixing and blending rules</b>	Noted.	-		
<b>Management systems Segregation and compatibility procedure</b>	While it is being noted that these specific aspects of the BAT document are not applicable to the facility, kindly provide an explanation as to how cross-contamination from the storage of different waste streams is avoided.	Noted.		
<b>Management systems Efficiency</b>	Noted.	-		
<b>Management systems Accident Management Plan</b>	Kindly provide feedback.	Kindly provide feedback.	There is a person who is a certified first aider on site and standard operations procedure used by certified first aiders apply implying that in case of accident, the victim is assessed, given first aid and if need be referred to hospital for treatment	Noted.
<b>Management systems Incident diary</b>	Kindly provide feedback.	Kindly provide feedback.	It is a standard procedure that accidents are recorded	Noted.
<b>Management systems Noise and</b>	Noted. Kindly ensure that the noise and vibration management	Noise is to be taken into consideration as part of the EMS, in view of	Section 4.1.8 describes the main sources of noise and vibration (including infrequent sources); and the	Noted.

<b>vibration management plant</b>	plan is incorporated into the EMS once the shredder is operational.	equipment on site which may have a significant noise impact.	nearest noise-sensitive locations. Noise monitoring survey collated recently from 7 noise sensitive receptors showed that in most cases the noise levels were lower than the baseline conditions and where these were higher, this was only marginal and considered as insignificant. Hence we consider that currently a noise management plan is not necessary; This could be reviewed again once the shredder becomes fully operational and if need be such a plan could be done at the time.	
<b>Management systems Decommissioning</b>	Reference shall be made to the respective section of the IP application form for this aspect.	Noted.		
<b>Utilities and raw material management Raw material consumption and generation</b>	Noted.	-		
<b>Utilities and raw material management Energy efficiency</b>	Noted.	-		
<b>Utilities and raw material management Internal benchmarking</b>	Noted.	-		
<b>Utilities and raw material management Waste as a raw material</b>	Noted.	-		
<b>Storage and handling Storage</b>	Reference shall be made to the respective section(s) of the IP application form for each relevant subsection of this aspect and/or kindly indicate if subsection is	The following section is relevant in view of the fuel storage areas on site – kindly provide information of the below aspect: - handling odorous materials in fully	Note that plant has in place standard storage tanks used for ELVs which prevent exposure of liquids to the external environment. So when emptying fluids from vehicles into these tanks there is no release of any odours and when these are transferred to the waste carrier who will take them	Noted.

	not relevant for the facility.	enclosed or suitably abated vessels and storing them in enclosed buildings connected to abatement.	away from site this is done through appropriate connections found on the tanks and so no odours are released.	
<b>Storage and handling Bunding</b>	Noted.	-		
<b>Storage and handling Tank and process pipework</b>	Noted.	-		
<b>Storage and handling Accumulation</b>	Noted.	-		
<b>Storage and handling Handling</b>	<p>With regards to the following aspect of the BAT document kindly make reference to the procedures in place to ensure that such a requirement is implemented:</p> <ul style="list-style-type: none"> <li>having systems and procedures in place to ensure that wastes are transferred to the appropriate storage safely</li> </ul>	Noted.	The management in charge ensures that the waste is unloaded at the designated areas. The area is small enough that everywhere is within visible distance and is constantly under supervision.	Noted.
<b>Storage and handling Bulking and mixing</b>	Noted.	-		
<b>Storage and handling Chemical incompatibilities</b>	Noted.	-		
<b>Storage and handling Containerised wastes</b>	Noted.	-		
<b>Extractive vent systems</b>	Kindly provide information about how this aspect will be tackled once the	Noted. Kindly refer to query 5 from EHD in the IPPC review document.	See reply to query 5	Noted.

	shredder is operational.			
<b>Full encapsulation / Inert atmosphere</b>	Noted.	-		
<b>Washing processes</b>	Noted.	-		
<b>Air emission treatments</b>	Noted.	-		
<b>Air emission levels</b>	Noted.	The air emission levels in this section will be applicable for any air monitoring requested by the Authority in relation to the operation of the shredder (as may be applicable).	Kindly identify which of section 4.6 is applicable to this plant. As already stated, I cannot see that any part is applicable	The emissions limit values stipulated in the BAT conclusions (quoted in the table in this section) will be applicable for the operations of the shredder and included in the IPPC permit accordingly.
<b>Waste water management</b>	Reference shall be made to the respective section(s) of the IP application form for each relevant subsection of this aspect.	Reference shall be made to the respective section(s) of the IP application form for <b>each relevant subsection</b> of this aspect also including page numbers within such documents. <b>See example on the first page under “Activities carried out”.</b>	<ul style="list-style-type: none"> <li>• Site has been sealed with underlying geotextile;</li> <li>• There are two water reservoirs on site one taking water from the yard and another from the roof areas. The water from the yard flows through a sedimentation tank which is regularly cleaned and also a full retention oil/water separator which is also regularly cleaned</li> <li>• Office sewage is connected to an internal cesspit tank which is regularly emptied</li> <li>• The reservoirs are also surrounded with geotextile to prevent leakages</li> <li>• The reservoirs are adequately sized than the average annual rainfall</li> </ul> <p>All this information is found in the EIA documentation dated 2011 and in all the documentation submitted for the IPPC application.</p>	Noted.
<b>Rainwater collecting</b>	Reference shall be made to the respective	Noted.		

	section of the IP application form for this aspect.			
<b>Re-use</b>	Reference shall be made to the respective section of the IP application form for this aspect.	Noted.		
<b>Daily checks</b>	Noted.	-		
<b>Water emission levels</b>	Noted.	-		
<b>Management of the process generated residues</b>	Kindly include reference to the internal procedures as part of the EMS regarding general housekeeping procedures.	Kindly include reference to the internal procedures as part of the EMS regarding general housekeeping procedures.	The yard is daily swept and all collected waste is duly placed in the designated areas.	Noted.
<b>Soil contamination</b>	Kindly provide feedback on the aspect “measures to prevent or quickly clear away leaks and spillages, and ensuring that maintenance of drainage systems and other subsurface structures is carried out”(this should also include reference to the oil container storage area)	Noted. Kindly provide a short description what measures are in place to respond to localised spillages.	Note that the yard is equipped with oil water separators and filtration systems and so any hydrocarbons which could eventually be spilled as a result of an accident will be trapped in these filtration systems which are regularly serviced.	Noted.
<b>Part 2: BAT for specific types of waste treatments: Noted</b>		-		

<b>ERA Internal Consultation Feedback</b>					
	<b>Consultee feedback</b>	<b>Comments by Gasparell Baling Co. Ltd.</b>	<b>ERA comments 30.01.2018.</b>	<b>Comments by Gasparell Baling Co. Ltd.</b>	<b>ERA comments 20.02.2018.</b>
<b>ERA Ambient Quality and Waste Unit</b>	<ol style="list-style-type: none"> <li>1. Following review of the document C.2.8 - Risk assessment, it was noted that the front page of said document is only making reference to the previous PA number and IPPC document number. Kindly provide clarification in this regards. Alternatively, reference numbers could be updated to include current PA number and IPPC document number.</li> <li>2. Document B3.1, the Waste management plan, needs to be updated to represent the increase in maximum waste storage capacity expected if this variation to the permit is approved. In the eventuality that waste projected to be received in the facility also increases, then the waste management plan would need to be updated accordingly.</li> <li>3. Further to ERA's comment in section C2.8, the consultant is kindly requested to provide further clarifications on the text highlighted under sections 4.1.2.3 and 4.1.3.3 of doc. C2.8, the Risk Assessment, stating: "The presence of hazardous materials mixed with other wastes is of grave concern and shows lack of waste management skills and defects in the processing lines of the company. The magnitude of consequence is high because of the effects such materials could have elsewhere".</li> </ol>	<ol style="list-style-type: none"> <li>1. Reason that same PA was used was because it forms part of the original site and IPPC since this will be one whole site.</li> <li>2. Document updated</li> <li>3. See comments above.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted.</li> <li>3. Noted.</li> </ol>		

	4. The applicant is requested to clarify whether any excavation works will be carried out as part of the extension. In case of excavation, the nature of the material to be excavated (i.e. whether it is hazardous or not) is to be adequately determined prior to its management and disposal.	4. There are no excavation works earmarked on site.	4. Kindly confirm whether any surface layers shall be removed prior to application of geotextile and hardstanding, and also during the works to be carried out by Enemalta personnel (e.g. connecting cabling to the substation).	4. No surface layers will be removed prior to application of geotextile and during works carried out in connection with substation.	4. Based on the phone conversation between ERA and the consultant on 20.02.2018, it was confirmed by the latter that no excavation/trenching works will be carried out on site, and that existing infrastructure will be utilized for the necessary connections to the Enemalta substation.
<b>ERA External Consultation Feedback</b>					
<b>Environmental Health Directorate</b>	<p>1. As for the increase in the storage area of this site in order to retain a larger quantity of scrap metals and also for increase parking facilities for the company vehicles. It is important that this area is covered with geotextile material so that to avoid any infiltrations from any possible leakages into the ground which may have an effect on the groundwater sources. It has been noted that from boreholes drilled on site, samples have confirmed that there was no indication of any ground contamination;</p> <p>2. Safe and proper handling of raw materials on site should also be ensured. Adequate preventive measures are to be taken regarding the potential accidental spillage of hazardous fluids, fuel and lubricants which are also to be well managed and adequately stored;</p> <p>3. All water for human consumption and personal use at said facilities is to be adequate, potable and from an approved source (preferably from the Water Utility Supply i.e. Water Services Corporation);</p> <p>4. Reservoir-harvested rain water</p>	<p>1. The site will be covered with geotextile overlapping the geotextile left exposed at the time when the first site was built so there is no risk of infiltration.</p> <p>2. noted</p> <p>3. noted</p> <p>4. noted</p>	1-4. Noted.		

	<p>should not be used for human consumption and/or personal hygiene. Reservoir overflow should be directly discharged onto the street after it has passed from the oil/ water separator;</p> <p>5. In relation to dusts generated from shredding process, baling process and other operations, a protocol for inspections and maintenance carried out on the dust water dousing mechanism and other activities aimed at controlling dusts generated by shredding and other processes should be submitted and records of such should be kept. Kindly submit the above protocol if this is available, if not, this will be requested as part of the IPPC Permit. Kindly also provide details of the activities carried out to ensure the dusts from waste heaps are not windborne especially on windy days must be detailed while regular cleaning in the surroundings should prevent further whipping action of the wind on dust.</p> <p>6. Contamination from hazardous materials - how will operations assure that hazardous materials such as radioactive sources, toxic metals and non-metals such as acids, lead, antimony, mercury and other metals</p>	<p>5. Comment noted; Shredder not yet operational; There is a water dousing system in order to control dust emissions.</p> <p>6. Presence of radioactive waste is detected using portable detector; All waste is visually inspected on arrival at facility; Any</p>	<p>5. In relation to dusts generated from the baling process and other operations, a protocol for inspections and maintenance carried out on the dust water dousing mechanism and other activities aimed at controlling dusts generated on site should be submitted and records of such should be kept. Kindly also provide details of the activities carried out to ensure the dusts from waste heaps are not windborne especially on windy days must be detailed while regular cleaning in the surroundings should prevent further whipping action of the wind on dust. <b>Kindly confirm whether the above protocol is in place and submit relevant SOP document if available, if not, this will be requested as part of the IPPC Permit. Regarding the dust water dousing mechanism and maintenance schedules for the shredder, kindly note that as part of the IPPC Permit these will have to be submitted prior to the use of the shredder.</b></p> <p>6. Kindly provide information about procedures in place in cases where radioactive waste is detected using portable detector.</p>	<p>5. The baling process doesn't generate dust since it takes place under cover which is part of the machine. There is no dust produce from metal heaps since metal found on site is quite heavy to be displaced by wind. The floors of the site are regular cleaned. The shredder has a dust dousing system whereby the metal which is being crushed is doused with water and at the same time cooled whilst being crushed. The water dousing mechanism initiates prior to operation and lasts throughout the crushing operations.</p> <p>6. The procedure is that the waste is not accepted on site.</p>	<p>5. Implementation of this system will be a requirement of the IPPC Permit. Effectiveness of such mitigation measures shall be confirmed once the shredder is put into operation.</p> <p>6. Noted. This to be included as a permit condition.</p>
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	<p>are removed during an inspection and decontamination procedure prior to the baling process prior to the shredding process. Moreover, any other 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; and</p> <p>7. 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.</p>	<p>hazardous wastes found in vehicles is removed during the depollution process. Other comments are noted.</p> <p>7. Noted</p> <p>PS this is a renewal application and no new machinery is being added. Furthermore that original application had been subject to scrutiny by same entity at the time.</p>	7. Noted.		
<b>Regulator for Energy and Water Services</b>	<p>1. REWS require clarification as to why the document (PA/03240/15) Application for Development Permission-Section 12 indicates that no fuel is stored on site. In fact the number of tanks and Total Capacity of each is omitted. This contradicts what is stated on pg 14 within B2.7 Risk assessment (C2.8.pdf) quoting "Fuel recovered from vehicles will be stored in appropriate storage tanks having a capacity of 1000 L each. The tanks have a standard overflow safety and ventilation system installed." Moreover the volume indicated in Dr. Doublet's e-mail to ERA dated 02/10/2017 does not tally with the capacity of specified within the Risk Assessment, therefore kindly confirm which is the correct data, and amend the risk assessment if necessary.</p>	<p>1. The reason for such a statement is that this was a request by MEPA/ ERA/PA since the original application (PA 02453/10) had a fuel station and underground fuel tank included. These were never built albeit they were incorporated in all the studies and IPPC application. When a decision was taken not to incorporate them in the development, MEPA had requested that we inform them by means of a letter and then when the renewal / extension was submitted, this would be dropped at the time. At the time when the</p>	<p>1. When the application form is submitted to the REWS, the correct tank capacities should be included corresponding to the same capacities in the competent person's report.</p>	<p>1. Noted; Currently (2/2/18) client is still waiting from local agent and foreign supplier for the proper system to use.</p>	<p>1. Operator to provide update and any further requirements from REWS once the technical information is provided to the latter.</p>

	<p>2. The table in Document C3.11 lists various waste items which are being stored or handled at Gasparell Baling Plant. This includes Engine, gear and lubricating oils but does not mention fuel including the petrol and diesel referred in Document C2.8. We suggest that petrol and diesel are included in this list.</p> <p>The applicant should note the following regulations and the corresponding application forms (available at <a href="https://www.rews.org.mt/#/en/a/70-fuels">https://www.rews.org.mt/#/en/a/70-fuels</a>) to obtain the necessary authorizations or notifications:</p> <ul style="list-style-type: none"> <li>• The storage of diesel above 300 litres is regulated by S.L. 545.22</li> <li>• The storage of petrol above 60 litres is also regulated by S.L. 545.22 but if this storage exceeds 300 litres, this will be regulated by S.L. 545.17</li> </ul> <p>With new information, the REWS will be able to guide the applicant to regulate the storages of fuel.</p>	<p>risk assessment as done, the tanks hadn't been purchased and author was never informed that they were slightly smaller (900ltr) than originally documented.</p> <p>2. Reason why they aren't listed is because they are used onsite. Secondly C2.8 is the risk assessment of all the operations on site and doesn't have anything to do with wastes. Using a similar reasoning then one should include in the same table the waste waters collected on site!</p> <p>(Still awaiting reply from REWS)</p>	<p>2. The reason why it was suggested to list petrol and diesel in this list (Doc C 3.11) was that they are considered to be waste as these are extracted from the scrapped vehicles. Upon evaluating reason provided, REWS may agree not to include them in the list. These fuels will be included in the secondary storage application form.</p> <p><b>ERA and REWS are to be notified of the outcome of the Operator's consultation with ELV unit suppliers regarding the measures to be undertaken for the petrol fuel tank not to contain more than 300 L of fuel.</b></p>	<p>Noted</p> <p>Noted; see reply above</p>	
<b>Water Services Corporation</b>	<p>1. Further to the application for a sewer discharge permit dated 2012, Gasparell shall apply and obtain a public sewer discharge permit with the DPU. The operator is to contact WSC in order to restart the permitting process immediately.</p>	<p>1. Application was submitted on 27/1/2012. Copy of receipt enclosed.</p>	<p>1. Kindly note that such application is to be renewed every year. The application dated 2012 for a sewer discharge permit needs to be updated and sent to WSC along with the application fee as it was instructed by WSC during their last inspection.</p> <p><b>Evidence that a renewal application and application</b></p>	<p>1. WSC never informed applicant or consultant that application needs to be renewed every year. Consultant has submitted several DPU applications with WSC and there was never any mention that these</p>	<p>1. Noted. Kindly provide Evidence that a renewal application and application fee has been submitted to WSC is to be provided prior to the issue of the IPPC Permit.</p>

	<ol style="list-style-type: none"> <li>2. The site has 2 underground storage reservoirs (one for clean rainwater and the other for runoff which originating from the baling area and is treated through an oil interceptor. Such wastewater is not to be discharged to sewer at any time and the overflow of both reservoirs should discharge to road surface.</li> <li>3. There is no indication of waste water connection for domestic sewage in the drawings. This should not be connected to either of the two reservoirs. Kindly submit an amended drainage plan showing such connection.</li> <li>4. Runoff from the proposed extension should be channelled through an oil interceptor similarly to other areas.</li> <li>5. Waste oils from ELV area should be kept in covered bunded areas and measures are to be taken to cater for spillages during the transfer of such oils.</li> <li>6. Car Batteries export are to be kept in covered bunded area (as already being done)</li> </ol>	<ol style="list-style-type: none"> <li>2. Note that during a recent inspection by your personnel they claimed that everything is in order.</li> <li>3. Site plan enclosed</li> <li>4. Sure, that's how it would be.</li> <li>5. Such oils are in special containers in a bunded area under cover.</li> <li>6. Same as above.</li> </ol>	<p><b>fee has been submitted to WSC is to be provided prior to the issue of the IPPC Permit.</b></p> <p>2-6. Noted.</p>	<p>should be renewed annually. In fact WSC never returned back. It was only during a recent inspection by WSC on site that they informed client about this issue.</p>	
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