

Environment and Resources Authority Report



1. Application details:

1.1	Applicable Policy	<p>Environment Protection Act (CAP. 549)</p> <p>S.L. 549.63 Waste Regulations, 2011 S.L. 549.89 WEEE Regulations, 2014</p> <p>S.L. 549.76 Industrial Emissions (Framework) Regulations, 2013</p> <p>S.L. 549.77 Industrial Emissions (Integrated Pollution Prevention and Control) Regulations, 2013</p>
1.2	Press dates	21 st April 2018
1.3	Application type	New IPPC Permit
1.4	Applicant	<p>Mr Mary Gaerty o.b.o. Greenskips Ltd. & GS. Rec Ltd.</p> <p>Which shall be equally and jointly responsible for the observation of all conditions in this permit unless the Authority specifically endorses a formal agreement endorsed by the legal representative of both companies which specifies otherwise.</p>
1.5	Date of receipt of consolidated application	24 th August 2017
1.6	Approved documents	<p>Environmental Permits WM 004/07 and WM 003/07 were first issued on 31 July 2010.</p> <p><i>Application document is available on the website of the Environment & Resources Authority on the following link:</i></p> <p>https://era.org.mt/en/Pages/Green-Skip-Services.aspx</p>
1.7	Proposal	<p>The temporary storage and/or repackaging and/or blending or mixing of both hazardous and non-hazardous waste prior to treatment/disposal/recovery at other facilities.</p> <p><i>Sections 5.1(c), 5.1(d) and 5.5 in Schedule 1 of the Industrial Emissions (IPPC) Regulations (S.L. 549.77) (“the Industrial Emissions (IPPC) Regulations”), to the extent authorised by the Permit, i.e:</i></p> <p><i>“Disposal or recovery of hazardous waste with a capacity exceeding 10</i></p>

		tonnes per day involving repackaging and/or blending or mixing prior to submission to any of the other activities listed in points 5.1 and 5.2” and “Temporary storage of hazardous waste not covered under point 5.4 pending any of the activities listed in points 5.1, 5.2, 5.4 and 5.6 with a total capacity exceeding 50 tonnes, excluding temporary storage, pending collection, on the site where the waste is generated.”
1.8	Location	Unit 1. Ta’ I-Imriekeb Ramla road, Maghtab

2. Background

2.1	Policy Context	<p>Environment Protection Act (CAP. 549)</p> <p>S.L. 549.77 requires installations carrying out activities as listed in section 5.1 of Schedule 1 to apply and obtain an IPPC permit for operations.</p> <p><i>In the case of this facility, operations consist of the: “Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging and/or blending or mixing prior to submission to any of the other activities listed in points 5.1 and 5.2” and</i></p> <p><i>“Temporary storage of hazardous waste not covered under point 5.4 pending any of the activities listed in points 5.1, 5.2, 5.4 and 5.6 with a total capacity exceeding 50 tonnes, excluding temporary storage, pending collection, on the site where the waste is generated.”</i></p> <p>S.L. 549.77 also requires installations carrying out the abovementioned activities to take all necessary actions aimed at the removal, control, containment and reduction of relevant hazardous substances, so that the site ceases to pose any significant risk to human health and the environment due to the contamination of soil and water as a result of the permitted activities.</p>															
2.2	Justification for Application	Existing permitted operations falling within the scope of the Industrial Emissions regulations															
2.3	Permit History	<p>A summary of the IP permit process is indicated below</p> <table border="1"> <thead> <tr> <th>Detail</th> <th>Date</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>Application IP 0001/12</td> <td>Received 23 January 2012</td> <td>Not ‘Duly Made’</td> </tr> <tr> <td>Response to request for information</td> <td>Request dated 15 March 2012</td> <td>Response received 29 May 2013</td> </tr> <tr> <td>Response to request for information</td> <td>Request dated 15 January 2014</td> <td>Response received 15 June 2014</td> </tr> <tr> <td>Response to request for information</td> <td>Request dated 16 April</td> <td>Response received 14</td> </tr> </tbody> </table>	Detail	Date	Comment	Application IP 0001/12	Received 23 January 2012	Not ‘Duly Made’	Response to request for information	Request dated 15 March 2012	Response received 29 May 2013	Response to request for information	Request dated 15 January 2014	Response received 15 June 2014	Response to request for information	Request dated 16 April	Response received 14
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		<i>information on waste management procedures</i> 2015 April 2016.		
		<i>Response to request for information including feedback from regulatory consultees</i> Request dated 20 April 2017 Response received 25 October 2017		
		<i>Application 'duly made'</i> 22 nd November 2017		
		<i>Public consultation</i> Commenced on 22 November 2017 Concluded on 23 December 2017.		
2.4	Compliance History	<p>For the past few years the Authority had several issues with on-site operations most notably in:</p> <ul style="list-style-type: none"> • Site Organisation and Management • Storage of Waste, particularly Hazardous Waste • Bunding of Hazardous Waste • WEEE Storage and Processing • Shredding of Wood/Paper and End-of-Waste Criteria • Containment of the Operations in the Maintenance Garage <p>During 2017 a constant effort has been noted by site operators to rectify several long-standing issues, particularly in light of the facility's IPPC application:</p> <ul style="list-style-type: none"> • Operations and Yard Managers have been changed and the facility is in the process of overhauling its waste acceptance and handling procedures and implementing a complete site reorganisation • The issues with the open roofs and blocked gutters in the storage sheds have been resolved whilst large amounts of hazardous waste stored in the open have been moved inside or exported • Proper use of the quarantine area • Plans for the installation of extra bunds within the hazardous waste sheds were submitted to the authority • Proper yard drainage system was observed • Installation of drip-tray beneath the generator • Mulching activity has been removed from IPPC application • Submitted proposal for baseline monitoring survey <p>All AERs have been duly submitted with 2016 report awaiting minor clarifications on input and output quantities of waste from the operator</p>		
2.5	Relevant Planning History	PA file	Title	Date of Issue
		<i>PA 4322/94</i>	<i>Development of site into a service yard for re-cycling, reclamation of waste and related</i>	<i>28 October 1996</i>

			<i>facilities such as offices, maintenance workshops etc.</i>	
		<i>PA 2542/09</i>	<i>First floor office extension over existing facility (recycling)</i>	<i>01 July 2011</i>
		<i>PA 3357/16</i>	<i>Minor amendments, consisting in accretions to existing structures of recycling facility including sanctioning of works, already carried out.</i>	<i>23 July 2017</i>

3. Non Technical Summary of Activities

3.1	Proposed activities	Activity	Description of specified activity	Limits of specified activity
		Sections 5.1(c), 5.1(d) and 5.5: Specified activities involving the disposal, recovery and temporary storage of hazardous waste.	Receipt, storage, Blending, mixing and repackaging of hazardous waste, waste electric and electronic equipment (WEEE), Type A and Type B Clinical Waste excluding the European Waste Catalogue (EWC) codes listed in Schedule 3.	From receipt of hazardous waste streams to dispatch to authorised facilities either locally or abroad. Storage of wastes accepted on site shall not exceed a period of 12 months on site if pending disposal and 36 months if pending recovery.
		Waste collection, pre-treatment and storage of non-hazardous waste streams.	Collection, sorting, preliminary treatment (including paper shredding and glass crushing), baling and storage of permitted non-hazardous wastes	From receipt of storage waste to dispatch of waste to authorised facilities either locally or abroad
		Storage and processing of plastic, paper and cardboard, wood, textiles and glass.	Storage and processing of waste in designated areas for a period of up to (but not exceeding) 12 months excluding	From receipt of waste to dispatch of processed waste to authorised facilities either locally or abroad

			the European Waste Catalogue (EWC) codes listed in Schedule 3.	
		Storage of waste ferrous and non-ferrous metal, inert material.	Storage of waste in designated areas for a period of up to (but not exceeding) 12 months excluding the European Waste Catalogue (EWC) codes listed in Schedule 3.	From receipt of storage waste to dispatch of waste to authorised facilities either locally or abroad
		Storage & dismantling of Waste Electric and Electronic Equipment (WEEE)	Receipt, storage and dismantling of WEEE according to approved method statement excluding the European Waste Catalogue (EWC) codes listed in Schedule 3.	From receipt of WEEE to storage and export to authorised facilities either locally or abroad.
		Drying of sewage sludge	Receipt of sewage sludge from the Water Services Corporation for drying as per method statement submitted in IPPC Application	From Receipt of sludge to storage/drying to transfer from site to authorised facility (permitted until such time that the Authority formally notifies operator that the process is to desist)
		Associated activity of generation of products from waste	Processing of cardboard and paper to produce animal bedding and absorbent material	From receipt of non hazardous paper and cardboard to processing and testing prior to resale as a product (Activity shall not commence until such time that ERA confirms in writing that EOW status is being achieved)
		Associated activity of general maintenance and repairs	Maintenance and repair/s on equipment and/or vehicles within the installation.	From maintenance/repair, activity to appropriate recovery/disposal of any waste generated on site.
		Associated activity of utilities	Diesel generator to produce energy.	From receipt of fuel to delivery of energy.

3.2	Applicable BREFs	<i>Best available techniques (BAT) specified in the BREF Waste Management Industries (published July 2006).</i>
3.3	Proposed emissions and mitigation	<p>Emissions to the Air</p> <p>A diesel generator (PS1) is utilized to power the HD Shredder and for emergency purposes</p> <p>Particulate and VOC emissions from the operations of a Heavy Duty Shredder (PS2) and a smaller shredder (PS3). VOC emissions could arise mostly from the shredding of waste packaging contaminated with solvents which is to be carried out in a suitably contained area. Shredding activities shall not take place during windy conditions.</p>
		<p>Emissions to Sewer</p> <p>Facility is covered by a Public Sewer Discharge permit from WSC which is renewed every year</p>
		<p>Emissions to the surface and groundwater</p> <p>There are no permitted emissions to surface and groundwater.</p>
		<p>Emissions to land</p> <p>There are no emissions to land.</p>
		<p>Waste Management</p> <p>All incoming waste entering this facility will be segregated, stored, repackaged in different containments depending on its nature. This is then transferred either to authorized local facilities or exported abroad.</p>

5. Consultations

5.1	Internal	
		<i>Air & Waste; Air Quality Team</i>
		Requested a revised noise monitoring survey covering current activities.
		<i>Air & Waste; Waste Management Team</i>
		Updates to waste management legislation, cesspit certification requirement, operational and end-of waste conditions.
<i>Biodiversity & Water Unit</i>		

		No feedback received
		<i>Compliance & Enforcement Unit</i>
		Consultation was carried out in terms of the compliance history of the site and on the permit conditions.
		<i>Environmental Assessment Unit</i>
		No feedback received
		<i>Permitting Unit</i>
		Updates to the conditions related to TFS permits and potential importation of waste.
5.2	External (in terms of regulation 19(2) of LN 10 of 2013)	<i>Radiation Protection Board</i>
		Provided conditions on handling of radioactive material.
		<i>Malta Resources Authority</i>
		Water: required complete installation and certification of all hardstanding and containment systems. Queries on whether the oil-water interceptor shall separate other materials than sediment. Energy: Applicant to inform MRA should the amount of fuel stored on site exceed the proposed 200 litres. ERA notes that later on during the processing of the IPPC application, the operator installed a larger fuel tank and is thus to obtain the necessary authorisation/registration from REWS.
		<i>Department of Environmental Health</i>
		Provided conditions on cesspit registration with the Superintendence of Public Health, risk assessment and water intended for human consumption.
		<i>Planning Authority</i>
		Concerns on whether the infrastructure is covered by the required development permits.
		<i>Civil Protection Department</i>
		No feedback provided
		<i>Veterinary Regulation Division</i>
		No feedback provided
		<i>Occupational Health & Safety Authority</i>
		No feedback provided

5.3	Operator	<p>Consultation with the applicant regarding bank guarantee and permit conditions.</p> <p>Whilst reviewing the draft permit, operator requested revisions to the required time-frames for submission of certain third party certifications and the acceptance of mixed municipal waste in small wheelie bins for repackaging and disposal at a permitted facility as a permitted activity. Specific condition on the latter was included as described in Section 7 below.</p>
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6. Public consultation

6.1	Public consultation	22 nd November 2017 – 23 rd December 2017
6.2	Response	<i>No response was received from the public</i>

7. Conditions

7.1	Conditions general	<p>Permitted Activities Conditions include which activities are permitted and any associated activities linked to operations within the particular site area.</p> <p>General Conditions Conditions include provisions regarding saving third party rights and duty of care of the environment.</p> <p>The Authority shall reserve the right to request monitoring and/or review of operational practices as deemed necessary to address any circumstances that may affect the quality of the surrounding environment. Any required monitoring and/or audits. Any required monitoring shall be carried out at the expense of the Permit Holder.</p> <p>Validity, Transferability and Surrender of the Permit Conditions regarding validity of permit, transfer of operator and surrender of the permit. Includes conditions related to revocation of permit.</p> <p>Improvement Programme Sets out the improvements to the facility and its operations with specific deadlines.</p>
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Operational Conditions

The Permitted Installation shall, subject to the conditions of this Permit, be managed, controlled and operated using the techniques and in the manner described in the IP application, or as otherwise agreed in writing by the Authority.

General Site Operations, Infrastructure and Security

Includes conditions regarding, site perimeter and cleanliness of site.

Waste

Various conditions regarding the type of waste accepted on site, the volume of waste that can be accepted on site, measures to store and handle waste are included in this section.

Emissions to Air

Point sources have been identified:

Emission reference	point	Source
1		Diesel generator
2		Heavy Duty Shredder
3		Shredder

The following ELVs have been included in line with the above-mentioned BREF (section 3.2) and subject to the requirements of Directive (EU) 2015/2193 of the European Parliament and the Council of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants (Medium Combustion Plant (MCP) Directive) as applicable:

Emission point reference	Parameter	Limit
1	Carbon Monoxide	-
1	Oxides of Nitrogen	200 mg/Nm ³
2-3	TVOC	30 mg/Nm ³
2-3	Total Particulate Matter	20 mg/Nm ³

The Operator shall monitor emissions of Total Particulate Matter and Total Volatile Organic Compounds from PS2, PS3 after the granting of this permit, according to a method statement approved by ERA.

Additional conditions include:

- The operator must apply suitable abatement measures to any equipment related to the physical alteration of waste (e.g. shredding machines, balers) to prevent escape of polluting substances, odour and excessive noise created by

the processes related to this equipment.

- Shredding of lightweight materials should be contained in a way that the shredded material is not exposed to the elements or prone to being blown away in instances of moderate to strong windforce.
- Open-air sewage sludge drying activities as described in the application shall take place until formally informed otherwise by the Authority. No other unabated drying processes shall take place on site.

Emissions to land and groundwater

Conditions have been included to prohibit any discharges to groundwater

Accident Prevention and Control

In the case of an accident, the Operator is being required to follow the Emergency Plan, submitted as part of the IPPC application as may be updated from time to time

Odour

The Operator shall use BAT so as to prevent or reduce odorous emissions.

Noise and Vibration

The Operator shall use BAT so as to prevent or limit emissions of noise and vibration. Various mitigation measures apply to alleviate noise and vibration from the installation. Provisions for noise monitoring are included.

Land and Groundwater investigations, closure and decommissioning

As part of the improvement programme for the installation, the operator shall submit a baseline report in line with European Commission Guidance concerning baseline reports under article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C 136/03).

Closure and Decommissioning

The Operator is required to maintain and operate the Permitted Installation so as to prevent or minimise any pollution and public health risk, including the generation of waste, on closure and decommissioning.

The Operator is also required to notify the Authority immediately upon a decision being taken to decommission the site.

		<p>A finalised version of the Decommissioning Plan shall be submitted to the Authority for approval not later than 10 days after the Authority is notified of the intention to decommission the site.</p> <p>The approved Decommissioning Plan shall be implemented within 12 months of final cessation or decommissioning of the Permitted activities or part thereof or according to a timeframe as may be agreed with the Authority.</p> <p>Management of the facility Conditions have been included to address training of staff, maintenance of plant and equipment, incidents and complaints, and issues pertaining to the Technically competent person</p> <p>Effluent Collection Conditions regarding cesspit, oil-water interceptor and hardstanding maintenance on site.</p> <p>Storage of materials Conditions regarding storage of fuels, chemicals, batteries.</p> <p>Maintenance Conditions regarding maintenance of machinery and equipment on site.</p> <p>Records, Reporting and Notification The operator is required to maintain records on several aspects of the permit and have these available for inspection by the Authority should the need arise. An Annual environment report has been included in the permit where the operator shall submit monitoring results and waste transfers for the previous calendar year.</p>
7.2	Specific Conditions	<p>Maintenance Area</p> <p>All mechanical parts and related equipment shall be stored in closed (roofed) structures (not open to the elements and constructed on impervious grounds capable of containing any accidental spills of fuels, oils or any other hazardous chemical/s.</p> <p>All vehicle and associated equipment maintenance is to be carried out on an impervious surface where a thorough clean up of fuels, oils or any other hazardous chemical/s can be readily undertaken. Any activities that involve grit, sand</p>

or glass blasting are strictly prohibited

Mixed Municipal Waste

Mixed municipal waste shall only be accepted on site in closed bins, through the operator’s own permitted waste carriers, and shall be disposed of at a permitted facility within the same working day. The amount of such bins containing municipal waste shall not exceed 6 (six) in number at any one time. The bins shall only be handled through dedicated equipment or vehicles which shall ensure that the municipal waste in the bins is emptied directly into the receiving registered refuse compaction vehicle for direct removal from site.

Such an operation can only be carried out in the quarantine area

Waste Import

Should the operator intend to import any metals, solvent waste and WEEE for recovery operations, s/he is to inform the Authority at least 6 months before the notification is submitted to the competent authority of dispatch in order to allow the authority to consider such a request and commence the relevant procedures in accordance with S.L.549.65. No other waste streams shall be considered for importation. the Authority shall only consider a request to import waste, in accordance to the provisions listed in Article 43 of Regulation (EC) 1013/2006 on shipments of waste, namely, imports from:

- a) Countries that are parties to the Basel Convention
- b) Countries in which the OECD Council Decision C (2001)107/FINAL applies
- c) Countries with agreement(s) in place Area experiencing situation of crisis or war

No such import procedure shall commence prior to approval in writing by the Authority.

7.3

Improvement programme

Table 1.4.1: Improvement programme		
Reference	Requirement	Date
1	Physical delineation and signage of all waste storage areas and quarantine area as per site layout plan submitted as part of the Document 8 of the IPPC application.	Within 1 month from the date of issue of the permit
2	Certification from a competent company or engineer that the relevant fire safety procedures and equipment are in place, including emergency firefighting water supplies for use by the Civil Protection Department.	Within 1 month of issue of the permit

		<p>3</p> <p>Submission of a land and groundwater baseline report in line with the Method Statement dated September 2017 approved by ERA and pursuant to Regulations 9(3) and 16(2) of the Industrial Emissions (IPPC) Regulations, and condition 2.9.4.</p> <p>Submission of an update to baseline report which includes additional testing to be carried out in the dry season.</p>	<p>May 2018.</p> <p>September 2018</p>
		<p>4</p> <p>Certification by an independent warranted civil engineer or engineer that the fuel retention separator has been constructed in accordance with EN 858, including inspection of the efficiency of operation and site layout plan.</p>	<p>Within 2 months of construction of the separator.</p>
		<p>5</p> <p>To provide the rated thermal input in megawatts thermal (MW), average load in use and annual operating hours of the diesel generator.</p>	<p>Within 2 months of issue of the permit.</p>
		<p>6</p> <p>Certification from a third party warranted engineer or architect showing that the bund for the generator's built-in fuel tank is constructed according to condition 2.2.6.8 below.</p>	<p>Within 3 months of issue of the permit.</p>
		<p>7</p> <p>Installation of collapsible bunding strips within the waste storage sheds to prevent any run-off within the sheds from reaching the gutter just outside the sheds.</p>	<p>Within 3 months from the issue of the permit.</p>
		<p>8</p> <p>Submission and implementation of a procedure for waste-type specific sampling for all different incoming waste delivered in bulk and/or containers in line with the requirements of BAT conclusions as per condition 2.4.1.12.</p>	<p>Submission of procedure within 3 month of issue of the permit.</p> <p>Implementation within 1 month of approval of procedure by the Authority</p>
		<p>9</p> <p>Submission of a method statement for carrying out a Noise Monitoring Survey in accordance with condition 2.2.9.4.</p>	<p>Within 4 months from the issue of the permit.</p>

		10	Submission of analysis to achieve End of Waste (EoW) criteria further to Schedule 10 of Subsidiary Legislation 549.63 to the competent authority for cardboard/paper to be used as animal bedding and/or absorbent material to enable the authority to consider inclusion of relevant criteria to be met in the permit.	Within 4 months of issue of the permit
		11	A) Submission of a method statement for monitoring of total particulate matter (TPM) and Total Volatile Organic Compounds (TVOC) in accordance with condition 2.2.1.6. B) Submission of total particulate matter (TPM) and Total Volatile Organic Compounds (TVOC) monitoring in accordance with the approved method statement as per item 11 A) above.	A) Within 6 months from the issue of the permit. B) Within 3 months from the Authority's approval of the method statement referred to in No. 9 above.
		12	Submission of details and photographic evidence of the installed weighbridge, together with its calibration details.	Within 6 months from the issue of the permit.
		13	Recertification by a third party warranted engineer or architect of site impermeability including cesspits and spill reservoirs considering the activities taking place within the yard.	Within 18 months of issue of the permit.
		14	Submission of an outline decommissioning plan.	Within 3 years of issue of the permit.

8. Financial matters

8.1	Financial guarantee	€ 46,725
8.2	Application fee	€30,000
8.2	Annual Fee	€3,000

9. Recommendation

IP 001/12/A is being recommended for for a period of 4 years issue subject to

- the conditions indicated in section 7
- Payment of Processing fees
- Establishment of a bank Guarantee

This report to the ERA Board has been prepared and endorsed by:

Case Officer: Simon Farrugia
Senior Officer
(Environmental Permitting)

Endorsed by: Anthony Aquilina
Unit Manager
(Environmental Permitting)

Signature:

Signature:

Date: 03rd April 2018

Date: 03rd April 2018