

1. Application details:

1.1	Applicable Policy	<p>Environment Protection Act (CAP. 549)</p> <p>S.L. 549.76 Industrial Emissions (Framework) Regulations</p> <p>S.L. 549.77 Industrial Emissions (Integrated Pollution Prevention and Control) Regulations</p>
1.2	Press dates	1 st December 2019
1.3	Application type	New IPPC Application
1.4	Applicant	DDE Attard Ltd.
1.5	Date of receipt of application	7th March 2016
1.6	Approved documents	<ol style="list-style-type: none"> 1. Application document is available on the website of the Environment & Resources Authority on the following link: https://era.org.mt/en/Pages/DDE-Attard-Ltd.aspx 2. Flow diagrams for all types of incoming waste (IP0001/13/A/DOC1) 3. Site Earthworks method statement (IP0001/13/A/DOC2) 4. CPD conditions enforced by themselves (IP0001/13/A/DOC3)
1.7	Proposal	<p>To issue an IPPC permit allowing the operation an installation carrying out the following activity:</p> <p><i>Sections 5.3(b)(iv) in Schedule 1 of the Industrial Emissions (IPPC) Regulations (SL 549.77), to the extent authorised by the Permit, i.e.</i></p> <p>“Recovery, or a mix of recovery and disposal, of non hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components”</p> <p>The application also includes the following waste treatment and associated activities:</p> <ul style="list-style-type: none"> • treatment of waste vehicles to remove hazardous components using specialised equipment, followed by dismantling; • Dismantling of washing machines, cookers and water meters; • Processing of metals, including shredding and pressing; • Baling of tyres and bumpers; • Stripping of cable wires; • Wood processing (including shredding); • Storage of various materials and waste associated with the above activities, including vehicle parts, tyres, scrap metal, wood, plastic, oils and fuel; • Temporary storage of containerised waste: to consist only of waste in sealed containers, received at the site for onward shipment without any on-site processing; • Composting of food waste: this is a pilot project processing around 100 tonnes of food waste each year; and

		<ul style="list-style-type: none"> Maintenance of on-site machinery.
1.8	Location	DDE Attard Ltd Scrap Lane Valletta Road Luqa, LQA 1764.

2. Background

2.1	Policy Context	<p><i>Environment Protection Act (CAP. 549)</i></p> <p><i>S.L. 549.77 requires installations carrying out activities as listed in section 5.3(b)(iv) of Schedule 1 to apply and obtain an IPPC permit prior to operations.</i></p> <p><i>In the case of this facility, operations consist of the “Recovery, or a mix of recovery and disposal, of non hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components”.</i></p> <p><i>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.</i></p>		
2.2	Justification for Application	Application for IPPC permit IP 0001/13/A.		
2.3	Application History	Detail	Date	Comment
		Environmental Permit WM 009/06	Issued on 14 March 2016 and expired on 14 th September 2016	Storage of and processing of scrap metal and the operation of a composter. Not renewed due to various outstanding compliance issues and pending processing of this IPPC application.
		Application IP 0001/13	Received 07 March 2016	Not ‘Duly Made’
		Response to request for information	Request dated 17 February 2017	Response received 09 October 2017
		Response to request for information including feedback from regulatory consultees	Request dated 12 February 2018	Response received 01 October 2018.
		Application ‘duly made’	11 March 2019	
		Response to request for information	Request dated 11 March 2019	Response (consolidated application) received 13 March 2019
		Public consultation	Commenced on 09 April 2019	Concluded on 08 May 2019

2.5	Compliance History	<p>Over the past 10 years of inspections by the Authority, the site has had a number of known repeated non-conformities mainly related to:</p> <ul style="list-style-type: none"> • Lack of hardstanding • Acceptance & treatment of unpermitted wastes including hazardous wastes (e.g. WEEE, ELVs etc) • Treatment and storage of WEEE without cover or hardstanding • Incorrect treatment of WEEE (shredding) • Storage of other unpermitted waste (e.g. IBCs with chemicals) • Evidence of incineration • Some movements of waste without consignment notes • Use of composter without permit • No quarantine area <p>Complaints:</p> <ul style="list-style-type: none"> • 20th & 23rd January 2012 – Smell of mercaptans (confirmed – treatment of gas tanks) • 14th August 2014 – Deposition and burying of domestic waste (no evidence found) • 14th August 2015 – Smell of mercaptans (no evidence found) • 15th April 2016 – Smell of mercaptans (inconclusive re: source being DDE Attard) • 20th December 2017 – Storage of Asbestos w/out permit (no evidence found) <p>There were also some confirmed incidents on site:</p> <ul style="list-style-type: none"> • 20th & 23rd January 2012 – Release of mercaptans to air during cleaning of gas tanks on site (Stop Order issued) • 8th November 2016 – Fire incident impacting tyres and baled recyclable material on site <p>On 20th February 2019, a Stop and Compliance order was issued against DDE Attard for operating without an environmental permit (OWK019/19). This OWK hits the area where the permit is being proposed as well as a large area adjacent to the main scrapyards; the land being managed by MIP.</p> <p>CED does not object to the issue of this permit, subject to payment of accrued fines related to OWK019/19.</p>														
2.4	Planning History	<table border="1"> <thead> <tr> <th data-bbox="475 1469 708 1503">PA application</th> <th data-bbox="708 1469 1075 1503">Details</th> <th data-bbox="1075 1469 1353 1503">Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="475 1503 708 1765">PA/05538/07</td> <td data-bbox="708 1503 1075 1765">Proposed upgrading of existing scrapyards (scrapyard has been in operation for over 50 years). Proposal includes construction of boundary fence; installation of weigh bridge and tyre cleaning facility; paving of site; and landscaping works.</td> <td data-bbox="1075 1503 1353 1765">Granted on 31 October 2013</td> </tr> <tr> <td data-bbox="475 1765 708 1861">PA/01876/15</td> <td data-bbox="708 1765 1075 1861">Amendments to approved PA 5538/07 to include composter shed and equipment.</td> <td data-bbox="1075 1765 1353 1861">Granted 26 November 2015</td> </tr> <tr> <td data-bbox="475 1861 708 2033">PA/04172/16</td> <td data-bbox="708 1861 1075 2033">Proposed amendments from approved permits PA 5538/07 & PA 1876/15; to amend site boundary, site area to remain as approved; proposed</td> <td data-bbox="1075 1861 1353 2033">Granted 14 November 2018</td> </tr> </tbody> </table>	PA application	Details	Status	PA/05538/07	Proposed upgrading of existing scrapyards (scrapyard has been in operation for over 50 years). Proposal includes construction of boundary fence; installation of weigh bridge and tyre cleaning facility; paving of site; and landscaping works.	Granted on 31 October 2013	PA/01876/15	Amendments to approved PA 5538/07 to include composter shed and equipment.	Granted 26 November 2015	PA/04172/16	Proposed amendments from approved permits PA 5538/07 & PA 1876/15; to amend site boundary, site area to remain as approved; proposed	Granted 14 November 2018		
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		erection of e.l.v. shed, additional access from private road, demolition of part of existing building and reconfiguration of site internal layout as indicated on drawings.	
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3. Non-Technical Summary of Activities

3.1	Proposed activities	Activity listed in Schedule 1 of the Industrial Emissions (IPPC) Regulations / Associated Activity	Description of specified activity	Limits of specified activity
		Sections 5.3(b)(iv): Processing and storage of End-of-Life Vehicles (ELVs)	Receipt and processing of ELVs and related sorting, management and storage of separated components.	<p>From receipt of ELVs according to EWCs specified in Schedule 3 to dispatch of separated components to authorised facilities either locally or abroad, and the selling for reused of upholstery.</p> <p>The maximum quantity of cars awaiting depollution as defined by S.L. 549.36 Waste Management (End of Life Vehicles) Regulations, shall not exceed 20 (twenty) at any one time.</p> <p>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.</p>
		Temporary storage and dismantling of specified types of WEEE as per Condition 2.4.1.5	Receipt, temporary storage & dismantling of cookers, water meters and washing machines as per Condition 2.4.1.5.	From receipt of specified WEEE to dispatch of dismantled components for recycling to a permitted facility either locally or abroad.
		Storage and stripping of wires	Receipt, storage and stripping of wires for separation into	From receipt of waste wires to dispatch of separated copper and plastic casing for

			copper and plastic destined for recycling.	recycling to a permitted facility either locally or abroad.
		Storage and processing of clean scrap metal and wood	<p>Receipt, storage and processing of scrap metal and wood in designated areas</p> <p>Use of shredder to process waste metal and wood.</p>	From receipt of waste metals and wood to dispatch to authorised facilities either locally or abroad
		Storage and processing of waste tyres and bumpers	Sorting, storage, cutting and baling of waste tyres in designated areas up to a maximum of 50 tonnes in any one time.	From receipt of waste tyres to dispatch of end product tyres for authorised use or to authorised waste facility.
		Temporary storage of sealed containerised waste.	Sealing at the site of generation, pre-notification to ERA for approval and storage within designated area as per Schedule 8.	Storage capacity will be to a maximum of 4 containers (110 tonnes). The storage for such containers shall not exceed a period of 12 months on site if pending disposal and 36 months if pending recovery.
		Operation of a composter for food waste	Composting of organic wastes authorised in this permit, in an enclosed system using equipment and mitigation measures specified as part of application and approved document IP 0001/13/DOC1.	From acceptance of specified organic waste into composting until (1) either dispatch offsite as waste or (2) dispatch of finished product offsite following approval in writing by the Authority
		End of Waste activity for compost	Composting of organic waste and distribution of compost	<p>From receipt of organic waste to composting and distribution of compost to schools.</p> <p>Waste compost shall not be dispatched from the site as a product until such time that the Authority confirms in writing that End-of-Waste status has been achieved. Any waste compost that does not</p>

				achieve End-of-Waste status shall be disposed of until End-of Waste status is achieved as confirmed by the Authority (in line with condition 1.6.2).								
		Fuel storage and refuelling of the company's heavy plant trucks and equipment.	Storage and refuelling of heavy plant vehicles, private vehicles and standby generator onsite.	From extraction of fuel (diesel and petrol) from the depollution process or receipt of fuel from suppliers authorised by the Regulator for Energy and Water Services (REWS) to refuelling of the company's heavy plant vehicles, private vehicles and standby generator.								
		Associated activity of general maintenance, utilities 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.								
3.2	Applicable BREFs	<p>Best available techniques (BAT) specified in the BREF for Waste Management Industries (published July 2006);</p> <p>As described in the Improvement program below, another BAT assessment against, Best available techniques (BAT) for the Waste Treatment Industries (published August 2018). This is required in view that the IPPC application was submitted in 2016 and the new BAT Conclusions have to be implemented in the permit within four years of their publication.</p>										
3.3	Proposed emissions and mitigation	<p>Emissions to the Air</p> <p>The proposal includes the following emissions points from stationary sources.</p> <table border="1"> <thead> <tr> <th>Emission point reference</th> <th>Type of machinery</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Composter biofilter</td> </tr> <tr> <td>2</td> <td>Hydraulic press</td> </tr> <tr> <td>3</td> <td>Standby generator</td> </tr> </tbody> </table> <p>Emissions to the sewer</p> <p>Applicant has applied for a Public Sewer Discharge Permit (DMU XYYY) but has not yet been granted since the necessary works are yet to be done for WSC to be able to sample and continue processing the application.</p> <p>No discharges of trade effluent into the sewer (whether from off-site or on-site discharge points) are allowed, unless specifically permitted by the Water Services Corporation. Prior to any discharge of trade effluent, the Permit Holder must provide evidence of authorisation including the Public Sewer Discharge Permit from the Water Services Corporation to the Authority.</p> <p>Any condensate/leachate generated from the composting process shall be treated as waste and not discharged to the sewer unless specifically authorised by the WSC.</p>			Emission point reference	Type of machinery	1	Composter biofilter	2	Hydraulic press	3	Standby generator
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	<p>Emissions to the surface and groundwater</p> <p>There are no permitted emission points to surface and groundwater.</p>
	<p>Emissions to land</p> <p>An emission to land from the overflow of the rainwater reservoir capturing rainwater from the yard and treated through an oil-water interceptor.</p> <p>Bi-annual monitoring of this overflow and annual certification of the oil-water interceptor shall be required.</p>
	<p>Noise and vibration</p> <p>Although the noise monitoring carried out as part of the IPPC application did not reveal any significant noise issues, the IPPC permit requires noise monitoring to be carried out annually unless prescribed otherwise later on by the Authority after considering series of results.</p>
	<p>Waste Management</p> <p>End-of-life vehicles (ELVs) shall be depolluted and dismantled. Metal, wood waste and dismantled ELVs shall be shredded in a dedicated area and resultant wastes separated on site for further treatment/disposal locally and abroad. The permitted WEEE accepted onsite (cookers, washing machines and water meters only) shall be dismantled and shredded. Waste tyres accepted onsite shall be baled and also exported.</p> <p>Following the granting of End-of-Waste status for compost, incoming food waste shall be visually inspected and treated aerobically in a dedicated area.</p>

4. Assessment against Regulation 6 and 15 of S.L.549.77

4.1	<p>Criteria for assessing the applicant's suitability</p>	<p>Applicable BREF documents for the installation include BREF for the Waste Management Industries (2006). A BAT comparison exercise has been carried against the above mentioned BAT conclusions. Certain aspects and measures required by the BAT conclusions are included as improvement programme items or permit conditions.</p>
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5. Consultations

5.1	Internal	<p>Ambient Quality & Waste Unit; Air Quality & Noise Team</p> <p><u>On application</u></p> <p>Require revisions to Noise monitoring plan done during full operations following the issue of the IPPC permit.</p> <p><u>On permit</u></p> <p>No comments to make on draft permit.</p>
		<p>Ambient Quality & Waste Unit; Waste Management Team</p> <p><u>On application</u></p> <p>Requested clarifications on composting process, risks and mitigation measures.</p> <p>Requested inclusion of specific legal provisions on treatment of waste vehicles to remove hazardous components using specialised equipment, followed by dismantling (S.L. 549.36) and Dismantling of washing machines, cookers and water meters (S.L. 549.89).</p>

The procedure laid down in regulation 14 of the Waste Regulations, S.L. 549.63 is obligatory for transfers of hazardous waste. However, regulation 14 of SL 549.63 provides that the said procedure can also apply for transfers of non-hazardous waste, at the discretion of the competent authority. At this stage, the Authority needs to decide whether such transfer is to be covered by the CP/CN procedure. From our end, we believe that the main concern could be that the wheelie bins in question may potentially contain waste other than food waste (e.g. infectious waste considering the various sources).

On a general note, it is suggested that the wheelie bins are washed at the Scheme site (i.e. before existing site) to ensure that they are clear/clean of loose waste, thus preventing undesirable leaks and, or odours.

Provided requirements for a complete application for End-of-waste status of compost, for which feedback is still pending from applicant.

On permit

1. Minor amendments to Waste Framework Directive references
2. Required that various types of hazardous waste are kept separate on site at all times.

Biodiversity & Water Unit

On application

No comments.

On permit

No feedback was provided.

Compliance & Enforcement Directorate

On application

Replied that did not manage to review application but do not want to hold processing back. Confident that main compliance issued that were continuously highlighted together as Permitting/CEU suffice for the moment.

On permit and history

See section 2.5

Environmental Assessment Unit

On application

No comments.

On permit

No comments.

Environmental Permitting Unit

On application

No nature permitting issues.

		<p><u>On permit</u></p> <p>No comments.</p>
5.2	External	<p>Civil Protection Department</p> <p><u>On application</u></p> <p>Requested revision on fire emergency provisions.</p> <p><u>On permit</u></p> <p>No objection to permit and provided the conditions in IP 0001/13/A/DOC3 for inclusion as approved document to be enforced by CPD.</p>
		<p>Energy and Water Agency</p> <p><u>On application</u></p> <p>No feedback provided.</p> <p><u>On permit</u></p> <p>No objection to proposed conditions.</p>
		<p>Occupational Health and Safety Authority</p> <p><u>On application</u></p> <p>The IPPC application mentions asbestos. Hence, besides all other relevant Occupational Health and Safety regulations, the employer is obliged to conform to the requirements of LEGAL NOTICE 323 of 2006 Protection of Workers from the Risks related to Exposure to Asbestos at Work Regulations [S.L.424.23]. Particular attention should also be give to the exposure of workers to noise and vibrations. The relevant regulations can be found on the OHSa website: http://ohsa.org.mt/</p> <p>The applicant is requested to submit a list of dangerous substances, including waste, and their maximum quantities stored on site at any one time. The classification of these substances under the COMAH regulations shall also be submitted.</p> <p>(Note 5 to Schedule I of the COMAH regulations, L.N. 179/2015 makes reference to the CLP-Regulation (EC) No 1272/20085 and mentions waste explicitly. Therefore, waste is treated on the basis of its properties as a mixture. It is the obligation of an operator to define the classification of this mixture. If the classification cannot be carried out by the procedures under the CLP-Regulation, other relevant sources of information may be used, e.g. information concerning the origin of the waste, practical experience, testing, transport classification or classification according to the European waste legislation). It should also be noted that this site lies in the vicinity of an existing COMAH site, Easygas Ltd. and any possible domino effects should be considered.</p> <p><u>On permit</u></p> <p>Slight amendment requested on condition relating to the <i>Occupational Health and Safety Authority Act</i>, (Chapter 424).</p>
		<p>Planning Authority</p> <p>No feedback provided</p> <p><u>On permit</u></p>

No feedback provided.

Transport Malta

No feedback provided

On permit

No feedback provided.

REWS

On application

Comments on fuel quality utilised for onsite equipment and vehicles. Require that applicant notifies and register any storages of fuel found on site with the Regulator for Energy and Water Services (REWS).

On permit

REWS has no further feedback on the proposed permit.

Environmental Health Directorate

On application

1. For the continuation of the operation and upgrading the existing waste management installation the Directorate has no objection.
2. The Directorate is particularly concerned that the Scheme lies within the Drinking Water Protection Zone and a Drinking Water Safeguard Zone. Also there are five private groundwater boreholes distance 235m to 390m and two Water Services Corporation groundwater boreholes located over 500m from site. 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 ground water sources. It has been noted that from boreholes drilled on site, samples have confirmed that there was indication of ground contamination.
3. 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.
4. 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).
5. It is highly recommended that the proposed installation of hard standing surface and surface water management including the oil-water interceptor are to be included.
6. The reservoir-harvested rain water 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.
7. If second class water, (from rain water reservoir), is used to sprinkle dust emission this should be treated for Legionella bacteria.
8. Odours especially fuels from activities should be controlled.

9. Mitigation measures are to be adopted to prevent noise and air pollution generated from shredding machine and baling machine.
10. With respect especially to points 8 and 9 (dust, odours and noise generation), it is being highly recommended that a landscaping plan be proposed and carried out. Mature trees and shrubs will aid in limiting emissions of dust and noise from the establishment.
11. Pest treatment must be carried out along the entire scheme since it is prone to rodent attraction. Especially since food waste will be received on site.
12. Mitigation measures mentioned to minimise the production of leachate are to be adopted. In case that any leachate is collected for agricultural use ONLY, this must be enclosed in a leak proof container prevent any foul smells.
13. Organic waste that will not be used for compost, as mentioned in, 3.119 pg 94, must not be kept on site for weeks but removed and disposed accordingly as soon as possible. As mentioned these waste must be kept in a sealed and leak proof container.
14. Any storage of fluids and fuel tanks such as diesel must be enclosed in a leak proof container. Where possible double sink containers should be used to prevent any leakage. Said containers are to be included in the monitoring programme.
15. Inspection and maintenance programmes of machinery, vehicles, infrastructure and temporary storage containers are to be adopted.
16. Proposed storage of asbestos on site must be in sealed containers as mentioned to prevent any health risk to employees and any nearby residential area.
17. 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.
18. 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.

On permit

Proposed that "A copy of the contract from the pest control company shall be made available to the competent authority underling the Pest Management Plan."

Malta Resources Authority

Page 73 point 3.26 – the reference to MRA should be replaced by REWS
 Page 22 point 53; page 28 point 73; page 41 point 2.61; - the MRA does not have any role in ground water protection or monitoring

Furthermore, on page 51, point 2.58, the report states that "the mean sea level aquifer is located around 56 to 60 m below the site. This reduces the risk of significant contamination of the aquifer considerably." This is further amplified by the statement on page 61 point 2.83 that "Considering that the groundwater at the Scheme site is found at a depth of around 56 to 60 m below the land surface, the substantial attenuation in contaminant

		<p>concentrations observed from 0 to 2 m is expected to continue up to this depth, thus significantly reducing the risk of groundwater contamination.” Although this does not fall within the remit of the MRA, the authors may wish to note that for pollutants that are soluble in water and that do not change form with time, all the pollution at the surface will, in general and eventually, reach the aquifer, the timing, location and concentration varying depending on geology, abstraction rates, natural discharge flows, and rainfall patterns.</p> <p><u>On permit</u></p> <p>No feedback provided.</p> <hr/> <p><i>Water Services Corporation</i></p> <hr/> <p><u>On application</u></p> <p>Various queries on potential discharges to the public sewer and suggested conditions and emission limit values.</p> <p><u>On permit</u></p> <p>Agreed to proposed permit conditions with minor typographical corrections.</p> <hr/> <p><i>Radiation Protection Board</i></p> <hr/> <p><u>On application</u></p> <p>1 No organisation/person can store radioactive material, unless they have a permit from the Radiation Protection Board (RPB). 2 The RPB currently only permits existing users to store their own material until such a time as there is a waste storage facility or the material is shipped to a foreign country under strict transport regulations.</p> <p>In view of the above, the applicant cannot handle or store any type of radioactive material and as such we ask ERA to ensure that at this stage such a clause is not granted to applicant. However, this does not exclude the fact that the applicant can apply separately to the RPB to acquire a storage licence.</p> <p><u>On permit</u></p> <p>No feedback provided.</p>
5.3	Operator	<p>Consultation on the draft permit conditions was carried out with the operator prior to being presented to the ERA Board. The operator requested clarifications on certain conditions and submitted timeframes for implementation of the improvement programme items. Specifically the following queries and/or comments were made:</p> <ul style="list-style-type: none"> • Site earthworks have commenced and intend to proceed the plan in IP0001/13/A/DOC2, however timeframes may change in view of certain operational changes which may be required by the Superintendence of Cultural Heritage in terms of archaeological monitoring. • Queries on the instances in which the bank guarantee or parts thereof may be released • Amendment to typographical mistakes. • Suggesting the possibility to sell upholstery in order to achieve the recycling targets for end-of-life vehicles. • To increase the maximum amount of waste tyres from 50 tonnes to 700 tonnes considering that designated area is big enough, existing fire prevention measures would still apply and ensure economies of scale. This resulted from a

		<p>miscommunication in the IPPC application process from the applicant's/consultant's side.</p> <ul style="list-style-type: none"> • To remove volumetric restrictions on the incoming/outgoing waste except for designated areas. • To remove brand from list of mobile/stationary combustion equipment • To increase the emission limit value for TVOC from the composter biofilter from 20 mg/Nm³ to 40 mg/Nm³. • Following the first noise monitoring episode, the frequency of subsequent monitoring to be agreed with ERA depending on the results. • Suggested to include possibility to handle refrigerated end-of-life vehicles • Suggested removal of conditions about deflagration reduction programme arising from BAT-WTI (2018). <p>Following discussions with ERA, certain comments were taken on board, others amended accordingly or ERA's decision to proceed with the original conditions explained further. The operator accepted some of the revisions but is contesting others. ERA is awaiting feedback on other conditions which were forwarded to the operator.</p>
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6. Public consultation

6.1	Public consultation	9 th April 2019 till the 8 th May 2019
6.2	Response	No response was received from the public

7. Conditions

7.1	Conditions general	<p>Permitted Activities</p> <p><i>Conditions include which activities are permitted and any associated activities linked to operations.</i></p> <p>Overarching Management Condition</p> <p><i>Conditions in this section refer to Environment Management systems present on site.</i></p> <p>Operational Changes</p> <p><i>Conditions in this section refer to additional clearances required in case of:</i></p> <ul style="list-style-type: none"> <i>i. variations which could lead to significant impact on human health or the environment;</i> <i>ii. any change in the nature or functioning or an extension of an installation where the change or extension in itself reaches the</i>
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capacity thresholds set out in Schedule 1 of the Industrial Emissions (IPPC) Regulations;

- iii. variations covered by the Environmental Impact Assessment Regulations;
- iv. aspects of the operations specifically prohibited by this permit;
- v. changes to emission limit values;
- vi. changes to fees;
- vii. renewal of the validity of this permit

Instead of applying six months prior to the expiry of the permit, it is being proposed that this is revised to nine months.

General Conditions

Conditions include provisions regarding saving third party rights and duty of care of the environment

General Site Operations, Infrastructure and Security

Includes conditions regarding site identification board, site security and general cleanliness and upkeep of the site

Pre-operational conditions

No acceptance processing, treatment or storage of un-depolluted end-of-life vehicles shall take place unless the following have been addressed:

- a) *All the areas of hard standing dedicated for this activity according to Schedule 8 have been installed and certified by a third party warranted mechanical or civil engineer to the satisfaction of the Authority.*
- b) *The separator and reservoir have been installed and the separator certified in line with the requirements in improvement programme number 4 of Table 1.4.1 covering the area mentioned in (a) above.*
- c) *Completion of the construction of structures (in line with PA 4172/16) associated with these activities.*
- d) *Certification by a third party warranted engineer that the bunds for the petrol and diesel storage tanks associated with this activity referred to in Improvement Program Item No. 3 in Table 1.4.1 have been constructed according to condition 2.6.3 below.*

Organic waste derived from the composter shall not be dispatched from the site as a product until such time that the Authority confirms in writing that the end of waste status has been achieved.

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 original IPPC application and in the subsequent applications for renewal and variation, or as otherwise agreed in writing by the Authority

Improvement Programme

Sets out the improvements to the plant and its operations with specific deadlines as described in Section 7.2 below. All IP items proposed in the previous permit have been fulfilled with the exception of the implementation of a baseline report and the associated submission of an outline site closure plan. New IP items have been added.

Emissions to Air

Point sources have been identified and emission limit values set for various parameters.

Point sources are :

Emission point reference	Type of machinery
1	Composter biofilter
2	Hydraulic press
3	Standby generator

Emission Limit values are:

Emission point reference	Parameter	Limit ⁽¹⁾
1	Ammonia	20 mg/Nm ³
	Hydrogen Sulphide	-
	TVOC	40 mg/Nm ³
	Dust	5 mg/Nm ³

(1) These limits are defined at a temperature of 273,15 K, and a pressure of 101,3 kPa.

Discharges to sewers

Conditions have been included so as to ensure compliance with the sewer discharge permit issued by the WSC.

Discharges to groundwater

Conditions have been included to prohibit any discharges to groundwater

Fugitive emissions of substances to air

Conditions have been included in relation to the application of BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the Permitted Installation, with particular reference to specific areas.

Fugitive emissions of substances to water and sewer

Conditions have been included in relation to the application of BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to water (including to groundwater) and sewer from the Permitted Installation with particular reference to specific areas of the installation.

Odour

Conditions have been included in relation to the application of BAT so as to prevent or where that is not practicable to reduce odorous emissions from the Permitted Installation, in particular by:

- i. limiting the use of odorous materials;
- ii. restricting odorous activities;
- iii. controlling the storage conditions of odorous materials;

- iv. *controlling processing parameters to minimise the generation of odour;*
- v. *optimising the performance of abatement systems;*
- vi. *timely monitoring, inspection and maintenance;*
- vii. *employing, where appropriate, an approved odour management plan*

Emissions to Land

No emission from the Permitted Installation shall be made to land except for the oil-water separator reservoir overflow subject to monitoring.

Noise and Vibration

Conditions have been included in relation to the application of BAT so as to prevent or where that is not practicable to reduce emissions of noise and vibration from the Permitted Installation.

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

Effluent Collection

Conditions regarding oil-water interceptor and hardstanding maintenance on site.

Storage of materials

Conditions regarding storage of waste, fuels, batteries.

Waste

Conditions have been included to ensure the proper classification of waste and disposal utilising carriers and brokers permitted by ERA and at facilities which are permitted to accept wastes.

Specific conditions anticipating the requirements of BAT-WTI 2018 have been included for immediate compliance.

In view of the proposed waste treatment activities, the permit includes detailed conditions on ELV and WEEE processing arising from respectively and composting operations.

All waste shall be stored and handled in dedicated areas, whilst maximum quantities of certain waste streams have been prescribed.

Energy Efficiency

As part of the Annual Environmental Report, the Operator has been requested to produce a report on the energy consumed at the Permitted Installation over the previous calendar year.

Accident prevention and control

In the case of an accident, the Operator is being required to follow the Emergency Plan, as approved by the Civil Protection Department.

Monitoring

The Operator is required to maintain and implement an emissions monitoring programme which ensures that emissions are monitored as specified in this Permit, and the results of such monitoring shall be assessed. The programme shall ensure that monitoring is carried out under an appropriate range of operating conditions, and that measurements for the determination of concentrations of substances specified in this Permit shall be carried out representatively

Notifications

A notification system has also been set up so as to ensure that any exceedances from ELVs, incidents on site or fugitive emissions, particularly due to planned maintenance are reported within a specific timeframe and through a set process.

Prior to the acceptance of containerised waste, ERA shall need to be notified in order to assess suitability of proposed waste types and conduct any consultations as may be required.

Closure and Decommissioning

In the event of cessation of business activity on the site, all wastes (including machinery, tanks, equipment) and hazardous materials (including chemicals) must be removed from the site such that any pollution risk is avoided and the site is returned to a satisfactory state. The Operator shall notify the Authority at least three months prior to taking actions, and shall submit a Site Closure plan to the Authority for approval. The Authority's approval is required prior to the commencement of the decommissioning works.

When deemed necessary the Authority may require the permit holder to take such additional measures, as it considers necessary with respect to after care obligations in relation, but not limited to remedial action, rehabilitation and monitoring of the site.

A finalised version of the Site Closure 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.

The approved Site Closure 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.

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.

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 and audit report has been included in the permit where the operator shall submit monitoring results and waste transfers for the previous calendar year.

A notification system has also been set up so as to ensure that any exceedances from ELVs, incidents on site or fugitive emissions are reported within a specific timeframe and through a set process.

7.2	Improvement programme	<i>The following items have been included as items in the improvement programme:</i>	
Table 1.4.1: Improvement programme			
Reference		Requirement	Date
1∞		To provide WSC the required information in order to obtain the sewer discharge permit.	Within one month of the issue of this permit.
2		Certificate from a third party warranted engineer or architect showing how the fuel storage tanks listed below in Item No. 3 have a bund constructed according to condition 2.6.3 of this permit.	Within six months of the issue of this permit.
3∞		<p>In order for the facility to be 'notified' as per S.L. 545.22 Petroleum for the Inland (Retail) fuel market Regulations, the Permit Holder should use and inform the Regulator for Energy and Water Services about the following:</p> <p>a) For petrol – a tank not exceeding 270 litres as approved by a competent person, as described within the same regulations</p> <p>b) For EN 590 diesel:</p> <p>i. 8,000 litre tank for on-site vehicle and equipment refuelling,</p> <p>ii. 270 litre tank for storage of diesel generating by the ELV depollution process</p> <p>iii. 220 litre tank built-in the standby generator as approved by a competent person.</p>	<p>a) & b) ii – Prior to the commencement of End-of-Life vehicle depollution</p> <p>b) i. & iii. Within six months of the issue of this permit.</p>
4		Certification by an independent warranted civil engineer or architect that the fuel retention separator has been constructed in accordance with EN 858, including inspection of the efficiency of operation covering the whole area of the permitted installation.	<p>a) Interim certification following completion of hardstanding works and certification of phase one (1)</p> <p>b) Full certification within three months of the installation of the</p>

			complete hardstanding.	
		5	<p>Certification by an independent warranted civil engineer or architect that the engineered site containment and drainage systems for the whole site are leak-proof and resistant to physical, mechanical and chemical stresses to which they may be subjected.</p>	Within one year of granting of permit.
		6	Notification on the completion of works in accordance with PA 4172/16 to ensure compliance with BAT.	24 months from the granting of the permit
		7	<p>Submission of an effluent monitoring plan for the oil-water separator overflow which considers the materials handled and activities carried out on site.</p> <p>Submission of results obtained from the effluent monitoring exercise approved by ERA.</p>	<p>Within three months of the installation of the complete hardstanding.</p> <p>Within one year from approval of the effluent monitoring plan.</p>
		8	<p>Submission of a method statement for carrying out a Noise Monitoring Survey in accordance with condition Error! Reference source not found..</p> <p>Implementation and submission of Noise Monitoring Survey as approved by ERA.</p>	<p>Within 4 months from the granting of the permit.</p> <p>Within time frames approved by ERA.</p>
		9∞	<p>a) Certification from a competent company or engineer that the emergency firefighting water supplies for use by the Civil Protection Department are in place according to approved document IP 001/13/DOC3.</p> <p>b) Updated certificate (a) above showing completion of relevant fire safety procedures and equipment installation according to approved document IP 001/13/DOC3.</p>	<p>a) Within 1 year of granting of the permit.</p> <p>b) Within 27 months of granting of the permit.</p>
		10	Submission of a Best Available Techniques (BAT) comparison for the BAT conclusions stipulated under Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing BAT conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council in accordance with conditions 4.4 and 2.4.1.2.	Within eight months of issue permit.

		11	Submission of certification from an independent warranted engineer that all equipment identified in Table 2.2.1.1 is in good working condition.
		12	Commissioning of second shredder and sorter based on Eddy current technology to be utilised for secondary processing of end-of-life vehicles following processing in the first shredder.
			Within two months of issue of permit
			Prior to the acceptance of un-depolluted End-of-Life vehicles.

8. Financial matters

8.1	Financial guarantee	<p>€ 132,725 consisting of:</p> <p>a) € 107,725 covering the site's environmental risk which would be revised at the next variation and/or renewal</p> <p>b) The sum of €25,000 shall be released from the financial guarantee by the Authority upon the permit holder's request, following the completion of the works described in IP 0001/13/DOC2, and after verification by the Authority that the works have been carried to its satisfaction. The release of the bank guarantee will only be considered by the Authority according to the staggered manner described below:</p> <ol style="list-style-type: none"> i. Release of €5,000 once the area referred to as "already paved" in IP0001/13/DOC2 is completed and approved by ERA; ii. Release of €5,000 once Phase 1 is completed and certified in line with condition 1.6.1 (a) and (b) and approved by ERA; iii. Release of €5,000 once Phase 2 is completed, certified and approved by ERA iv. Release of €5,000 once Phase 3 is completed, certified and approved by ERA v. Release of €5,000 once Phase 4 is completed, certified and approved by ERA.
8.2	Application fee	€5,000
8.3	Annual Fee	€500 + calculation of inspection fees covering previous.

9. Recommendation

Recommend for GRANTING, subject to the conditions indicated in section 8 for a period of period of 4 years.

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

Case Officer: Simon Farrugia
Senior Officer (Environmental Permitting)

Endorsed by: Nathalie Ellul
Team Manager

Signature:

Signature:

Date:

Date:

ERA Board Decision: