

Annex I: Comments regarding the IPPC application

Form A

Section	Duly made?	Comments dated 14th October 2013	Comments dated March 2014	WasteServ Response May 2014
A1.1	✓	Noted.		
A1.2	✓	Noted.		
A1.3	✓	Noted.		
A1.4	✗	Please indicate Sewage Discharge Permit number. Kindly note Annexe 11 only gives an 'Application for a Public Sewer Discharge Permit' which is not dated. Hence kindly provide the updated permit from WSC.	Noted. Kindly include receipt from WSC.	Kindly refer to email from Ms Paula Grech Bonnici dated 03/04/2013 (Annex 1).
A2.1	✓	Noted.		
A2.2	✓	Noted.		
A3.1	✓	Noted.		
A3.5	✓	Noted.		
A3.6	✓	Noted.		

Form B

Section	Duly made?	Comments dated 14th October 2013	Comments dated March 2014	WasteServ Response May 2014
B1.1	✗	1. Column 1: 'Operation of a material recovery facility (MRF)' to be placed under heading <i>Directly associated activities</i> ,	Noted.	

		<p>2. Column 1: It is recommended that the full list of activities which are carried out on site (as per permit EP 0021/09/C) are placed under the under heading <i>Directly associated activities</i>;</p> <p>3. Column 1: Kindly include other activities such as boilers/engines/generators/RO plants under heading <i>Directly associated activities</i>.</p>		
B1.2	✓	Noted.		
B1.3	✓	Noted.		
B1.4.1	✗	<p>1. Section is to provide a history of the site including past site uses. To this end you may wish to refer to past aerial photographs.</p> <p>2. Article 22 (2) of the IED stipulates that <i>Where the activity involves the use, production or release of relevant hazardous substances and having regard to the possibility of soil and groundwater contamination at the site of the installation, the operator shall prepare and submit to the competent authority a baseline report before starting operation of</i></p>	<p>Noted.</p> <p>Noted. Kindly provide Baseline Assessment and further information once it is completed.</p>	<p>Baseline Assessment is included with this submission (Annex 2).</p>

		<p><i>an installation or before a permit for an installation is updated for the first time after 7 January 2013.</i></p> <p>Hence a risk assessment is required to be submitted in line with the <i>Interim guidance document on land and groundwater baseline reports</i> (inserted as Annex II). A baseline report with land and groundwater monitoring may be required, as determined by the conclusions of the risk assessment report.</p>		
B1.4.2	✓	Noted.		
B1.4.3	✓	<p>With reference to Annex 4, Drawing AL(2_)30j <i>Block Plan of the Proposed Works</i> is not relevant as submitted in view of the colour coded legend regarding <i>To Build</i> and <i>To Demolish</i>. Hence it is recommended to remove the legend and relevant markings and retain the plan.</p> <p>The block plan shall clearly label all activities and structures mentioned in section B2.2.1 et. seq, including the different tanks, emission sources, abatement, etc.</p>	Noted.	
B2.1	✓	Noted. Kindly advise the expected timeframes for ISO14001 implementation.	Noted.	

B2.2.1	✓	Noted. Please confirm that the permitted operating hours in EP0021/09/C will be maintained.	Noted.	Kindly keep in view request to vary permitted operating hours included in EP021/09/C submitted to the Authority on 11/06/2014.
B2.2.2	✓	Noted.		
B2.2.3	✓	Noted.		
B2.2.4	✗	<p>This section requires further exhaustive details as regards to the comparison with the relevant BAT conclusions listed hereunder. For ease of reference a summary table of relevant BREF conclusions has been inserted in Annex III:</p> <ul style="list-style-type: none"> i. Waste Treatments Industries (Aug 2006) in particular sections 5.1, 5.2 (para. 65 to 94), and Additional Information submitted during the information exchange on Waste Treatments Industries (Oct 2005), in particular section 8; ii. Emissions from storage (July 2006); and iii. Energy Efficiency (Feb 2009). <p>These are available at http://eippcb.jrc.ec.europa.eu/reference/</p>	<ol style="list-style-type: none"> 1. Page 23 of additional document requires updating through inclusion of monitoring information; 2. Page 24, 25, 26, 35 may require updating as text is in red. 3. Page 27, further information is required regarding Water emission levels 4. Page 31, kindly advise whether the emission levels for mechanical biological treatments fall within the limits prescribed in BAT for odour, NH3 and PM10. 5. Page 34: Kindly provide reply. 6. Page 52: Instrumentation and automation to detect leakage: 	Updated BREF document included with this submission (Annex 3).

			<p>Please provide a reply.</p> <p>7. It is recommended that, sections representing processes which are not undertaken on site (such as waste oil refinement, crude oil storage) are marked as 'Not applicable'.</p> <p>8. Kindly advise why section regarding 'Storage of packed dangerous substances' is not addressed in terms of Training and responsibility, Storage area, Separation and segregation,</p> <p>9. Page 64, section on bales is deemed incorrect as through testing, it has been determined that bales do contribute to emissions.</p> <p>10. Page 65: Kindly advise on the application of further techniques to remove odour due to short-term open storage such as covering with material (such as shredded wood).</p> <p>11. Page 71: Missing information</p>	
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			with respect to chutes; 12. Further information should be submitted with respect to Best Available Techniques for achieving energy efficiency at an installation level and in energy-using systems, processes, activities or equipment.	
B2.2.5	✓	Noted.		
B2.3	✓	The materials and other substances proposed to be used are required to be marked on the site layout plan, including whether they are stored inside or outside. Should these be stored outside, the provision of security is considered important. The maximum storage capacity for each substances and the bunding capacity shall be included.	Noted.	
B2.4	✓	For each piece equipment, the type of equipment (hermetically-sealed system, fixed system or mobile system) and the use is required to be identified.	Noted.	
B2.5	✓	Noted.		
B2.6.1	✓	The breakdown areas need to be defined (MBT 1, MBT 4, MBT5)	Noted.	
B2.6.2	✓	Noted.		

B2.7	✓	<p>Further details are required as regards to utilisation of freshwater, which should be broken down in terms of sources and end-use, including any washings. Should accurate data not be available, estimates are considered sufficient.</p> <p>If no accurate data estimates are enough. All infrastructural elements (e.g. different reservoirs) are to be cross referred to the layout plan.</p>	Noted.	
B2.8	✓	<p>Details regarding fire are noted.</p> <p>Further information are requires as regards to:</p> <ul style="list-style-type: none"> (a) plans for action to be taken in case of failure of abatement equipment; and (b) plans for actions/ procedures to be taken in case of other environmentally relevant incidents (e.g. spillages and gas leakages) 	Noted.	
B2.9	✓	<ol style="list-style-type: none"> 1. A training programme on environmental and waste management issues, including the permit and any ongoing improvements is to be included; 2. The TCP for the training shall be identified; and 	Noted.	

		3. Training programme for any new recruits employed in the facility is required to be identified and provided.		
B2.10	✓	Details noted. A written commitment for land and ground water monitoring and remediation if necessary.	Noted.	
B 3.1.1	✓	Noted.		
B3.1.2,	✓	The bunding capacity for each of the hazardous liquid wastes as a % of the material stored within each bund shall be provided. Note that such wastes are required to have bunding which meets the greater of the following: <ul style="list-style-type: none"> - 110% of the capacity of the largest container within the bunded area - 25% of the total volume of substance which could be stored within the bunded area. More details on protective measures including security measures are required to be submitted	Noted.	
B3.1.3	✓	Noted.		
B3.2	✓	Noted.		
B3.3.1	✓	1. It is unclear why this section has	Noted.	

		<p>been marked as 'No', particularly since i.) there is an application/permit (to be verified) for sewage discharge, ii.) Plan at Annexe 4 indicates 'foul water drainage' section;</p> <p>As regards to plan in Annexe 4 the following is being noted and clarification is required, also to be reflected on plan;</p> <ol style="list-style-type: none"> 2. The sources of foul water drainage are unclear and hence each source needs to be described and pointed out clearly (ablution facilities, showers, etc); 3. The destination of the foul water drainage is unclear (i.e. sewerage and/or cesspit/s) and needs to be clarified on plan; 4. The management process of the 'surface water from asphalt areas' is required to be clarified including the conditions and reasons upon which the water from reservoir B is emptied by bowser and the final destination of this water; This includes any treatment of the said water prior to its collection such as oil water interceptor. 5. Annex 4, 'layout of underground 	<p>Noted.</p>	
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		<p>drainage' indicates that water from asphalted areas within the MTP/MRF are mixed with water from external asphalted areas, including any bunded area. Clarification is required as to the reasons behind this mixing;</p> <p>6. If applicable, the location of the process water tank and whether any process effluent is discharged to sewer;</p> <p>7. Clarify whether the 'water runoff from existing water courses' is surface or below surface;</p> <p>8. The source of water reservoir for fire fighting.</p>		
B3.3.2	✓	Noted.		
B3.3.3	✓	Kindly refer to earlier comments on Sewage Discharge Permit.	Noted.	
B3.3.4	✗	Details as regards to the release of Schedule A and B substances are required to be submitted.	Application form is marked 'Analysis in progress'. Kindly update the section and confirm presence or otherwise of such substances.	Form B has been updated and is included as Annex 4 to this submission.
B3.4	✓	Noted.		
B3.5	✓	See comments on section B 3.3.1.	Noted.	
B3.6		1. A block plan which indicates all the emission points on site is required, including the RTO. This is to include the details of EP	Noted. Awaiting update to assessment through Risk Assessment.	Kindly refer to Diagram 5 together with Table 1 of Baseline Assessment (Annex 2).

		<p>0021/09/C Table 2.4.1:Emission points to air.</p> <p>2. Clarification is required whether the values in Table 7/8 are based on measured value or otherwise.</p> <p>3. To clarify in Table 7/8 whether the value is Mg or mg;</p> <p>4. To clarify why a number of values in table 8 are 'tba' or '-';</p> <p>5. Are other pollutants such as sulphur- containing compounds also relevant to this section?;</p> <p>6. Details of abatement measures are required and clarification whether this is the oxidation bed? Does everything pass from RTO prior to discharge?</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	
B3.7	✘	<p>The EIS has been noted. However the predictions of the EIA are dated June 2005 whereas there are a number of years of experience operating the plant. Moreover, sensitive receptors around the site have changed and include amongst others the Family Park. Therefore, kindly provide an updated summary of the environmental impacts related to odours, also in view of the complaints which are received and reviewed.</p>	<p>Noted. Awaiting update to assessment through Risk Assessment.</p>	<p>Baseline Assessment is included with this submission (Annex 2).</p>
B3.8	✓	<p>Noted.</p>		


B3.9	✘	<p>The EIS has been noted. However the predictions of the EIA are dated June 2005 whereas there are a number of years of experience operating the plant. Moreover, sensitive receptors around the site have changed and include amongst others the Family Park. Therefore, kindly provide an updated summary of the environmental impacts related to noise.</p> <p>Kindly note that as regards to noise surveys in section 10, these should specify the use of Type 2 equipment whereas Type 1 should have been used. Moreover, more recent surveys (as per monitoring protocol of the site) are advisable to be submitted. These are to be in line with the TOR in Annex IV.</p>	<p>Noted. Awaiting update to assessment through Risk Assessment.</p> <p>Kindly provide response.</p>	<p>A noise study in line with the terms of reference provided is currently underway.</p>
B3.10	✓	Noted.		
B3.11	✓	Noted.		
B4.1	✘	<p>The EIS has been noted. However the predictions of the EIA are dated June 2005 whereas there are a number of years of experience operating the plant. Moreover, sensitive receptors around the site have changed and include amongst others the Family Park. Therefore, kindly provide an updated summary of the environmental impacts and effects on other sites.</p>	<p>Noted. Awaiting update to assessment through Risk Assessment.</p>	<p>Baseline Assessment is included with this submission (Annex 2).</p>

B4.2	✘	Ditto.	Noted. Awaiting update to assessment through Risk Assessment	Baseline Assessment is included with this submission (Annex 2).
B5.1	✓	Noted.		
B6.1	✓	Noted.		
B6.2	✓	Noted.		
B6.3	✓	Noted.		
B7.1	✓	Application for PA 05076/10 to be appended to the application, as requested.	Noted.	
B8.1	✘	Police conduct of 'relevant person' is missing. Kindly provide.	Kindly provide.	Kindly note that the TCP for the installation shall be Ing Mary Grace Micallef. CV is included in Annex 5 to this submission.
B8.2	✓	Noted.		
B8.3	✓	Noted.		
B9.1	✓	Noted.		
B10	✓	Noted.		

Section	Environmental Health Directorate Comments dated 17 th September 2013	Further EHD query	WasteServ Response May 2014
B 3.6	Register of 3rd party complaints (including nature of complaint, corrective measures) This register was a requirement (article 1.3.1.11) of EP0021/09/C (issued 20/4/12 and varied 8/3/13). Kindly clarify whether this requirement was carried out and whether the this register has been audited and a report handed to	No further comments	

	competent authority? Repeat complaints should be included in this register aswell.		
B 2.2.2	Regenerative Thermal Oxidiser (RTO) – “All process air components that can be oxidised are thus rendered harmless.” Kindly clarify whether these will also be rendered odourless.	No further comments	
B 2.2.4	Storage and handling – “A number of doors in the MTP shed are fast roller shutters.” What % of doors/openings? Should this be all doors/openings?	No further comments	
Table 1: BAT conclusions for biological treatment	<p>The development of a quality management system (QMS) and environmental management system (EMS) shall be carried out within a reasonable dictated time frame</p> <p>The implementation of the environmental monitoring programme covering air (including odours), land, water and noise should be continued.</p> <p>Any additional storage areas of the MRF located in an outside yard must be contained suitably to prevent odour nuisance to 3rd parties.</p> <p>Emissions to air – “Monitoring of stack emissions is conducted periodically.” Such monitoring should be regular and records kept.</p>	<p>No further comments</p> <p>EHD would like to emphasise the importance of stated regular monitoring and record keeping</p>	<p>WasteServ commits to conduct monitoring as per approved monitoring programme and retain records accordingly.</p>

Section	MRA Comments dated 17 th September 2013	Further MRA queries	WasteServ Response May 2014
	<p>The IPPC application document for SAWTP mentions fuels and a standby generator.</p> <p>The MRA requests SAWTP to apply accordingly using the attached form (Annex Va) for an authorization or notification to operate a secondary storage of fuel. This should be accompanied by a non-refundable application fee and a technical report by one of the competent persons in the attached list (Annex V b).</p>	No further comments	
	<p>Last year the MRA was in communication with WasteServ regarding the possible use of the registered/notified boreholes in the vicinity of Sant' Antnin development site, for the purpose of groundwater monitoring. The Authority identified a number of such boreholes (refer to site plan below) and even obtained consent from some owners willing to allow sampling. Nonetheless the Authority did not receive any type of updates regarding such monitoring programme. Please clarify the matter.</p>	No further comments	

			
	<p>Please also note that with regards to the soakaways the applicant has to apply with the MRA for a separate clearance</p>	<p>No further comments</p>	<p>No soakaways will be implemented.</p>
	<p>From a Climate Change perspective MRA requests that the operator reports inputs and outputs the weight of materials in tons for each step of the process i.e. also including report intermediate input/outputs and rejects from each process step.</p>	<p>No further comments</p>	