

## Environmental Permit

Environment Planning Act (CAP. 549)

Permit number  
**EP 0011/10/C**

Approved Documents:  
**EP 0011/10/C/DOC1**

The Environment and Resources Authority (hereinafter the Authority; the Competent Authority or ERA) in exercise of its powers under the Environment Protection Act (CAP. 549), hereby authorises:

**Gasco Energy Ltd.** (hereinafter “the Operator” or “the Permit Holder”),

Of / Whose Registered Office (or principal place of business) is at:

**Gasco Energy Ltd.**  
**Kalafrana**  
**Birzebbuga BBG 3011**  
(Company registration number: **C 44953**)

to operate an installation at:

**Gasco Energy Ltd.**  
**Kalafrana**  
**Birzebbuga BBG 3011**

to the extent authorised by and subject to the conditions of this Permit.

This permit is valid for **four years** from the date below. An application for renewal of this permit is to be submitted at least six months prior to expiry of this permit.

Signed	Date
Prof. Victor Axiak Chairman	27 / 3 / 2019

**Authorised to sign on behalf of the Competent Authority**

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## Conditions

### 1 General

The Permitted Installation shall, subject to the conditions of this Permit, be managed, controlled and operated as described in the EP Application, or as otherwise previously agreed in writing by the Authority.

#### Status Log

Detail	Date
<i>EP application submitted</i>	04 May 2010
<i>Permit Issued (A)</i>	12 June 2012
<i>Variation Issued (B)</i>	25 September 2013
<i>Renewal Issued (C)</i>	27 March 2019

#### 1.1 Permitted Activities

1.1.1 The Operator is authorised to carry out the activities and the associated activities specified in Table 1.1.1.

Table 1.1.1		
Activity	Description of specified activity	Limits of specified activity
Importation, storage and bottling of Liquefied Petroleum Gas (LPG)  NACE Code: H52.10 Warehousing and storage including the operation of storage tanks	From importation of LPG by ships and road tanker to transfer via pipeline on quay, storage in six horizontal mounded tanks, cylinder and road tanker filling for distribution.	From receipt of raw materials filling and distribution of product.
Associated activity of utilities	One stand-by generator to produce energy.	From receipt of fuel to delivery of energy.
	Rainwater settlement tank and Oil water interceptor	From receipt and treatment of on-site and off-site rainwater and other material, to discharge of treated water <sup>1</sup> into the marine environment and disposal of intercepted wastes at licensed facilities.
	Stand-by diesel operated fire-pump.	From receipt of fuel on site to operation of the fire-pump during emergency and fire drills.
	Degassing of cylinders	From degassing of cylinders at the Cylinder Filling Hall using high pressure water to treatment of resulting effluent

<sup>1</sup> Treated water means water passing through the silt and oil interceptor installed on the site.

	Wastewater treatment plant	and venting of excess LPG to air.
	LPG fired furnace	From settling of water used for cylinder testing to treatment and recirculation of water.
	Reverse Osmosis plant	From transfer of fuel from site to use in furnace for baking of painted cylinder.
		From receipt of mains water to delivery of utility and discharge of effluent to land.
Associated activity of storage, treatment and disposal/recycling of waste materials	Handling, storage, treatment and disposal/recovery of wastes from installation.	From generation of waste to dispatch for disposal or recycling (including recovery) offsite.
Associated activity of testing and maintenance	Testing and maintenance of gas cylinders	From de-gassing and testing of cylinders to cylinder maintenance (including grit blasting, painting and welding in the Maintenance Hall) and scrapping of cylinders no longer fit for purpose.
	Maintenance and repairs which may be carried out as required.	From maintenance/repair activity to appropriate recovery/disposal of any waste generated on site.

## 1.2 Site

- 1.2.1 The activities related to the importation, storage of LPG and filling of cylinders authorised under condition 1.1.1 shall not extend beyond the Site, as shown on the Site Map in Schedule 2 to this Permit.

## 1.3 General Conditions

- 1.3.1 The conditions and obligations of this permit are without prejudice to any other regulation, code of practice, conditions or requirements requested by other Authorities or entities, including but not limited to the Planning Authority, the Occupational Health and Safety Authority, Transport Malta and the Regulator for Energy and Water Services (REWS).
- 1.3.2 This permit is granted saving third party rights. The Permit Holder is not excused from obtaining any other permission required by law.
- 1.3.3 A copy of this permit shall be available at all times on site at the permitted facility, including any Variation Notices or amendments to it.
- 1.3.4 All persons have a duty of care to protect the environment. The operator shall become familiar with his legal obligations and good environmental practice.

- 1.3.5 The site shall be maintained in a tidy condition, free from litter and waste (whether arising from own activities or external sources).
- 1.3.6 The site must be well secured at all times.
- 1.3.7 The company shall maintain a register of third party complaints. The register shall record the name and address of the complainant(s), the date, location, source and nature of the complaint and the corrective action undertaken, where such action proves necessary.
- 1.3.8 A Site Notice shall be installed and displayed in a prominent position such as to be readily visible by the public. The notice shall contain the following information:
- a) State that the site operates under an Environmental Permit issued by ERA.
  - b) Provide the Permit Number and the name of the Permit holder.
  - c) Provide a 24-hour emergency telephone number for the Permit holder.
- 1.3.9 All plant, equipment and technical means used in operating the Permitted Installation shall be maintained in a good operating condition and maintenance records of the above shall be kept by the operator in line with Section 4.3 of this Permit
- 1.3.10 The Permitted Installation shall be managed, controlled, supervised and operated by staff who are aware of the importance of environmental protection and suitably trained on the requirements of this Permit, in particular on those permit conditions relevant to their duties. All staff shall be provided with adequate training and written operating instructions to enable them to effectively carry out their duties. Training records shall be maintained in line with Condition 4.4. Subcontractors who enter the site shall also be made aware of any obligations arising from the permit which might affect their duties.
- 1.3.11 The Authority may request additional monitoring and/or review of operational practices and/or commission audits on the installation as deemed necessary to address any circumstances that may affect the quality of the surrounding environment. Any required monitoring and audits shall be carried out at the expense of the operator.
- 1.3.12 Without prejudice to condition 1.3.11, the Authority may take any action deemed necessary including but not limited to the suspension of any activity/operation until investigations are concluded.
- 1.3.13 The validity of this permit is until **27<sup>th</sup> March 2023**. The Permit Holder may renew the permit upon application with the Authority expressing his/her intention at least six (6) months prior to the expiry of the permit. The permit will be considered renewed and varied once the official Renewal and Variation Notice is issued by the Authority.
- 1.3.14 The permit is issued against a Bank Guarantee of €14,100 (Financial Guarantee Number 8820190228; dated 28<sup>th</sup> February 2019) which shall be renewed annually. This guarantee will have to be maintained throughout the validity of the permit. Following renewal and/or variations to this permit, the Authority may require amendments to the Bank Guarantee.
- 1.3.15 The Bank Guarantee shall remain in place for the duration of the validity of this permit and shall only be released upon confirmation of full compliance with the permit conditions by the Authority.
- 1.3.16 The Authority may take part or all of the bank guarantee if the Permit Holder fails to take the necessary action, in cases of non-compliance with these permit conditions, the Act or any subsidiary legislation thereof, or in cases where environmental integrity is threatened. This bank guarantee is without prejudice to any environmental liabilities that may ensue through failure to adhere with permit conditions or any other works/

activity carried out on site. Should the Authority forfeit the Bank Guarantee either in part or in full, the permit holder shall ensure that this is replenished without undue delay.

- 1.3.17 In cases where the bank guarantee does not cover the expenses incurred by the Authority to undertake any remedial action failed to be undertaken by the Permit Holder, the Permit Holder is to financially reimburse the Authority of all the expenses incurred.
- 1.3.18 The Authority may add, amend, substitute or revoke any of the conditions of this permit after notifying the Permit Holder of its intention and after describing the changes to the Permit Holder. This, without prejudice to any prevailing circumstances that would preclude the Authority from following such a procedure.
- 1.3.19 The Authority may carry out compliance checks that vary in frequency according to the site's compliance with the permit conditions. Any such checks carried out by the Authority may be made at the Permit Holder's financial expense.
- 1.3.20 The Authority's representatives are empowered to inspect every part of the site and ask for any closed or locked areas to be opened. They are also entitled to be given any proof, documentation, plans, receipts or any other records which these Authority representatives may request.
- 1.3.21 The Authority may suspend or revoke this environmental permit or part of this environmental permit where significant mismanagement of the site is observed or any of the permit conditions are not respected after a written warning is given by the Authority or in any eventuality that gives the Authority enough reason to suspend/revoke this permit.
- 1.3.22 The Operator shall undertake all necessary measures and precautions to prevent spillage of raw materials, intermediates, products, waste and any other materials
- 1.3.23 Upon the joint application of an operator and a proposed transferee, the Authority may transfer the environmental permit to the proposed transferee. The transfer of the permit will not relieve any of the operators from his environmental obligations and liabilities.
- 1.3.24 Any incident including accidental release of liquid, solid or gaseous materials from the site that could be regarded as causing environmental damage, or as posing a threat of environmental damage, shall be reported as soon as possible and not later than within 24 hours to ERA, without prejudice to the emergency plan of the installation and Health and Safety.

#### **1.4 Operational Changes**

- 1.4.1 The operator may apply for a variation in permit and shall seek the Authority's written agreement prior to any operational changes, by sending to the Authority:
  - a) Written notice of the details of the proposed change, including an assessment of its possible effects (including changes in emissions and waste production) on risks to the environment from the Permitted installation;
  - b) Any relevant supporting information (e.g. chemical/fuel consumption, technical details, changes in the type/use of substances/mixtures, etc.);
  - c) Any relevant supporting assessments and drawings, and;
  - d) The proposed implementation date.Any such change shall only be implemented following the issue of a variation of the permit by the Authority.

## 1.5 Improvement Programme

- 1.5.1 The Operator shall complete the improvements specified in Table 1.5.1 by the date specified in that table, and shall send written notification of the date of completion of each requirement to the Authority within 10 working days of the completion of each such requirement.

Table 1.5.1: Improvement programme		
Requirement		Deadline
1	Installation of a site notice as per condition 1.3.8.	Within 1 month of issue of the permit.
2	Submission of an emission result certification by an independent accredited body or warranted engineer for PS4 – LPG fired furnace for SO <sub>2</sub> , NO <sub>x</sub> , and CO. Emission testing shall take place whilst the plant shall be operating under stable conditions at a representative even load. In this context, start-up and shut-down periods shall be excluded.	Within 2 months of issue of the permit
3	A monitoring proposal for discharges to sea as per Condition 2.2.12.	Within 3 months of issue of the permit

## 2 Operating Conditions

### 2.1 Emissions to Air

- 2.1.1 All processes which generate significant levels of airborne contaminants (such as dusts, gases, odorous chemicals) shall have effective local collection and shall discharge (after treatment where necessary) through a stack or vent located and/or designed in such a way as to avoid local effect.
- 2.1.2 Emissions to air shall only arise from the emission points specified in Table 2.1.2, as described in approved document EP 0011/10/C/DOC1.

Table 2.1.2 : Emission points to air	
Emission point references <sup>1</sup>	Source
PS1	Stand-by generator
PS2a-b	Stand-by diesel fire pumps
PS3	LPG vent located at Cylinder Filling Hall
PS4	LPG fired furnace
PS5	Vent from grit blasting machine
PS6	Cylinder painting cabin

- 2.1.3 Diesel (Gas oil) used for the generator and the fire-pump shall have sulphur content not greater than 0.1 %.
- 2.1.4 Only gas oil satisfying condition 2.1.3 shall be utilised as a source of fuel for the generator, and the co-incineration of any material or additional fuel including engine or other waste oil is strictly prohibited. Any change in fuel type shall require the notification and approval of the Authority prior to commencement of its utilisation
- 2.1.5 The operator shall submit certification for the stand-by generator (PS1), diesel fire-pump (PS2) and LPG fired furnace (PS4) referred to in table 2.1.2, by an independent warranted engineer showing that the combustion plans are in good working condition

<sup>1</sup> According to Section 7.1 of the application (as revised on 9 October 2017).

every four years. The certifications shall be submitted as part of the Annual Environmental Report (AER).

- 2.1.6 In the case of breakdown or malfunction of equipment, the Operator shall reduce or close operations as soon as practical until normal operation can be restored.
- 2.1.7 Industrial combustion plants (e.g. furnace, generators, etc.) shall comply with the provisions of S.L. 549.122 (Limitation of emissions of certain pollutants into the air from medium combustion plants regulations) and any other applicable subsidiary legislation.
- 2.1.8 The exhaust from general building ventilation (e.g. extractors or fans in walls or roofs) shall be vented in such a way as to avoid adverse environmental effects and in accordance with applicable legislation in this regard.
- 2.1.9 Should the Operator intend to install equipment which could lead to additional emissions to air (e.g. boiler, etc.), a variation of this Permit must be secured prior to installation and operation of this equipment.
- 2.1.10 In the event of malfunction or breakdown leading to abnormal emissions, the Operator must:
- a) Investigate immediately and undertake corrective action, and
  - b) Adjust the process or activity to minimise those emissions, and
  - c) Record the events and actions taken.
  - d) In the event of non-compliance causing immediate danger to the environment, operation of the activity must be suspended and the Competent Authority informed within 24 hours.
- 2.1.11 Further to condition 2.1.10, the operator shall, at the written request of the Authority and within 10 working days, identify the specific cause of the of the abnormal emission and examine means for its elimination or minimisation including:
- a) Relocating / redesigning / extending the stack(s) or vent(s) to a point where the issue minimised.
  - b) Replacement of fuel.
  - c) Preventative measures such as replacement of process materials (e.g. odorous solvents) by more environmentally sensitive compounds.
  - d) Improved storage of materials.
  - e) Use of additional abatement measures.
- 2.1.12 All abatement equipment and ducting shall be cleaned and maintained and record of such maintenance is to be kept in accordance with Condition 1.3.9 of this permit (as per manufacturer specifications).
- 2.1.13 The Operator shall prevent or where that is not practicable reduce fugitive emissions of substances to air from the Permitted Installation. Any alternative techniques to be applied by the operator shall be no less effective than those applied within the installation and shall be approved in writing by the Authority prior to their implementation.



## 2.2 Effluent discharges

- 2.2.1 The operations of the installation shall not hinder the achievement of good status for surface and groundwater as required under the Water Policy Framework Regulations, SL 549.100.
- 2.2.2 Discharge to the marine environment shall only arise from the discharge point specified in Table 2.2.1.

<b>Emission Reference</b>	<b>Point</b>	<b>Source</b>	<b>Geo-coordinates</b>
E1		Oil water Interceptor receiving runoff from installation roofs and road surfaces.	58098, 63003

- 2.2.3 The discharge pipeline from the interceptor shall be maintained in a clean and efficient operational condition, so as to minimise the probability of blockages, leakages or other failures. Maintenance records for the pipeline shall be provided to the Authority upon request.
- 2.2.4 No discharges from roads and hard paved areas to groundwater shall take place at the installation.
- 2.2.5 Rainwater shall not be discharged into the cesspits. Foul sewer drains must be strictly segregated from storm water drains
- 2.2.6 Rainwater shall be segregated from all process areas that are potentially contaminated with raw materials, intermediates and/or products. If this is not possible, rainwater from areas where contamination by oil or chemicals is likely (such as loading/unloading and bunded areas) shall pass through an adequately sized interceptor.
- 2.2.7 The Operator shall undertake all necessary measures and precautions to prevent spillage of oils, wastes and any other materials.
- 2.2.8 The oil interceptor shall be monitored and maintained to ensure efficient operation. A log of monitoring and waste removal from the interceptor shall be maintained on site and be available for inspection by the Authority.
- 2.2.9 No discharges to groundwater shall take place at the installation.
- 2.2.10 All process and storage areas must be appropriately contained.

### Monitoring of physico-chemical analyses

- 2.2.11 Discharges to the marine environment shall comply with the emission limit values in Table 2.2.2 as total concentrations in the sample.

(1)	(2)	(3)	(4)
<b>No</b>	<b>Parameter</b>	<b>CAS number</b>	<b>Annual average Emission Limit Value</b>
1	Flow	-	-
2	pH	-	6-10
3	Temperature	-	8°C above sea water
4	Total Petroleum Hydrocarbons	-	5 mg/L
5	Total Suspended Solids	-	35mg/L

- 2.2.12 Within three (3) months of issue of this permit, the Operator shall submit a monitoring proposal aimed at carrying out analyses for the parameters in Table 2.2.2 over a period of 12 months from the validity of the permit, in order to characterise the effluent being discharged from point E1. In order for the data from this exercise to be statistically analysed, the operator is required to take a minimum of 2 samples during a 12-month period and that each sample includes as a minimum of 2 replicates. The methodologies to be utilised and the associated detection limits shall be indicated as part of the monitoring proposal.
- 2.2.13 Following approval of the monitoring proposal by the Authority, the Operator shall immediately carry out the requested monitoring.
- 2.2.14 Based on the results obtained, the Authority reserves the right to amend the list of parameters to be monitored during the next reporting period.
- 2.2.15 The above limits may be subject to revision by the Authority, as deemed necessary. These limits shall not be used as means of selecting the detection limits of the equipment or analytical method to be used.
- 2.2.16 The operator shall ensure that any sampling and chemical analysis is carried out by a laboratory accredited to at least EN ISO 17025:2005/Corr 1:2006 and preferably for each and every test listed in Table 2.2.2. The operator shall include a copy of the laboratory's accreditation certification monitoring proposal required by Condition 2.2.12.
- 2.2.17 The operator shall analyse for the parameters in Table 2.2.2 using standard methods that are in line with Articles 3 and 4 of Commission Directive 2009/90/EC. In case methods other than EN, EN ISO or ISO are intended to be used for the analyses listed in this table, the operator shall seek the Authority's prior written approval in order to analyse for a particular parameter using any standard method. In the case of monitoring through use of multi-parametric probes, these are to be calibrated as per instrumentation standard. Copy of latest certification is to be submitted to the Authority together with the monitoring results.
- 2.2.18 The results of the effluent characterisation exercise shall be submitted to the Authority as a report submitted as part of the AER. The information contained in this report shall be prepared in accordance with the format specified in Schedule 1 and include information on the sampling process, timing and method.
- 2.2.19 Should exceedances of the emission limit values be recorded in more than one sample over a year, the operator shall increase the frequency of the sampling of that specific substance per month. The increase in monitoring shall be reflected in a revised monitoring programme that is to be approved by the Authority.
- 2.2.20 Following the submission of the results, the Authority may request an action programme aimed at achieving the emission limit values for any confirmed exceedances in those specified in Table 2.2.2. Alternatively, the operator may designate a mixing zone for any of the substances following the procedures specified in Regulation 8(b) "Mixing Zones" in S.L. 549.100. This requirement shall be communicated by the Authority if deemed necessary.
- 2.2.21 Oil interceptor/s shall be inspected by an independent warranted architect or engineer at least once every three years. The warranted architect or engineer shall amongst other things inspect the interceptor for efficiency of operation. Certification produced by the architect or engineer shall be included in the AER

## **2.3 Emissions to Land**

- 2.3.1 No emissions to land shall take place from the Permitted Installation except from the point specified in Condition 2.3.2.

- 2.3.2 Discharges to Land shall only take place from the reverse-osmosis plant treating mains water and located at the following coordinates 35°48'32.9"N / 14°32'11.4"E.
- 2.3.3 In the event of contamination of land, the operator shall notify the Authority within 24 hours, forward a decontamination plan for the Authority's approval and execute it within an agreed time frame.

### **Waste**

- 2.3.4 All operations concerning the management of waste are subject to the Waste Management Regulations S.L. 549.63 and the Waste Management (Activity Registration) Regulations S.L. 549.45.
- 2.3.5 All wastes shall be stored within a designated and controlled storage area(s) prior to ultimate disposal. Wastes to be recycled shall be stored in a designated container or area and shall not be mixed with other wastes.
- 2.3.6 Waste produced at the Permitted Installation shall be recycled, reused or recovered unless technically and/or economically impossible.
- 2.3.7 Liquid and hazardous wastes shall be stored in a labelled, closed container(s) within a designated and controlled storage area(s) prior to ultimate disposal. Wastes of different natures and having different European Waste Catalogue codes as established by Commission Decision 2000/532/EC shall not be mixed in the same container.
- 2.3.8 Packaging material and containers which came into contact with hazardous substances shall be regarded as hazardous waste and shall be disposed of in an appropriate manner.
- 2.3.9 Operator shall register with ERA as a producer of packaging and provide the required information, as well as achieve the targets as set out in Subsidiary Legislation 549.43, the Packaging and Packaging Waste Regulations. Documentation as evidence of such should be maintained for a period of 3 years and be made available, upon request by ERA.
- 2.3.10 No storage of waste, equipment or materials is permitted on property outside the site premises. However, non-hazardous waste awaiting collection may be placed outside the site premises for a period not exceeding 6 hours prior to collection.
- 2.3.11 No storage of waste destined for disposal is permitted for a period exceeding 12 months and no storage waste destined for recovery is permitted for a period exceeding 3 years.
- 2.3.12 All metal waste, including but not limited to LPG cylinders, is to be kept on an impermeable surface.
- 2.3.13 The Operator shall ensure that all LPG cylinders which are no longer used for refilling of gas disposed of at a facility which is duly authorised for disposal of such material.
- 2.3.14 The Permit Holder shall ensure to keep records for every consignment of wastes removed from the Site indicating the EWC Code, description, quantities, date of removal, contractor name (including for transport), consignment note number (where applicable) and manner and place of final disposal/recovery.
- 2.3.15 Off-site disposal or recovery of wastes may only take place at a facility licensed for that purpose.
- 2.3.16 On-site disposal of wastes by any means including burning, disposal to drain or surface water, burying or deposition on land is prohibited. This excludes treated waste water discharged into sewer in line with the Sewer Discharge Permit.

- 2.3.17 Movement of hazardous waste to authorised facilities shall be covered by a valid consignment permit obtainable from the Competent Authority. Each movement shall also be covered by a consignment note obtainable from the Authority
- 2.3.18 Should the operator require the services of a waste broker, it shall be ensured that any such broker is a duly registered waste broker in accordance with S.L. 549.45.
- 2.3.19 In the case of waste that is sent for treatment or recovery to another facility locally or abroad, the audit trail shall cover all waste from the point of generation or collection to the end recovery or disposal facility.
- 2.3.20 Without prejudice to condition 2.3.6, transboundary movement of waste shall be carried out in accordance with the following regulations, as amended from time to time:
- a) Regulation (EC) N° 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste as implemented through SL 549.65;
  - b) Commission Regulation (EC) N° 1418/2007 of 29 November 2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) N° 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of waste does not apply, and
  - c) Any other applicable legislation.
- 2.3.21 The Operator shall make use of the services of a registered waste carrier for the transport of waste from the site in accordance activity 38 of schedule 1 of Subsidiary Legislation 549.45, the Waste Management (Activity Registration) Regulations. Where the company removes wastes using its own transport the vehicle(s) must also be registered as a waste carrier in accordance with S.L. 549.45 or any statutory provisions or regulations amending or replacing them.
- 2.3.22 Where relevant, the Operator shall make use of the services of a registered waste broker in accordance with S.L. 549.45 or any statutory provisions or regulations amending or replacing them for the management of its own waste on site, provided that the no waste is accepted from any other site. The Permit holder shall notify the Authority of the Waste Broker in charge of its waste management operations and shall notify the authority of any changes in the waste broker details within 5 working days of any such changes.
- 2.3.23 For any decommissioned equipment, the Operator shall submit to the Authority a proposal for the screening of the intended equipment to be discarded which should include the details of any hazardous materials in the equipment, decontamination procedures and the procedure for final disposal.
- 2.3.24 All spent grit shall be treated as hazardous waste, unless proven otherwise by the operator.
- 2.3.25 Disposal and/or recovery certificates shall be kept on record and made available for inspection for a period of at least 5 years from date of their issue.

## **2.4 Storage**

- 2.4.1 All bulk oil storage tanks and bulk storage of chemicals, including any fuels and lubricating oils, shall be provided with an adequately designed bund system with an impermeable base and walls. The capacity of the bund shall be a minimum of 110% of the largest tank within the bund or 25% of the total capacity of all the tanks within the bund, whichever is greater. All filling and off-take points shall be located within the bund.

- 2.4.2 Bulk storage tanks for chemicals and associated bunding and pipe work shall be visually inspected at least once a month. Such records should be kept and made available to the authority upon request.
- 2.4.3 Drums and containers of solvents, oils or any other chemicals shall be stored in designated and secure storage areas. Storage areas shall be designed so that surface and ground waters cannot be contaminated by spillages.
- 2.4.4 Chemicals of different properties shall be stored as specified in respective MSDS sheets. Such sheets shall be made available and accessible to personnel responsible for the management of the storage areas and for inspection by the Competent Authority. Incompatible chemicals shall not be stored within the same bund.
- 2.4.5 The storage of flammable, toxic and hazardous substances and the maintenance of safety critical equipment should correspond to good international practice.

## **2.5 Accident prevention and control**

- 2.5.1 An Emergency Response Plan shall be followed and maintained containing details of the location, nature and quantity of chemicals, oils and fuels stored, any special hazards, a drawing showing location of drains and the emergency phone numbers of the operator and relevant authorities. It shall also include actions to be taken in the case of incidents which could affect the environment, such as fires and chemical/fuel spills. The emergency plan shall indicate that accidental releases of chemicals and fires caused by chemicals are to be managed as specified in the respective MSDS sheets.
- 2.5.2 The Emergency Response Plan shall be updated whenever necessary and the updated version sent to ERA and the Civil Protection Department. This plan shall be consistent with the requirements and provisions set out under the COMAH regulations.
- 2.5.3 Upon renewal, the emergency response plan shall be updated to include any operational changes and/or additions. In the event that no changes and/or additions were carried out within the permit's timeframe; a confirmation from an independent competent person shall be submitted clearly stating that no further update is necessary. The updated version sent by the Permit Holder to the Civil Protection Department for their perusal/clearance.
- 2.5.4 In the case of an accident (including fire, chemical spills, etc.), the Operator shall follow the Emergency Response Plan referred to in Condition 2.5.1 and, in the case that such accident could be regarded as causing environmental damage or as posing a threat of environmental damage, the Operator shall notify the Authority within 24 hours.
- 2.5.5 Spillages of chemicals or other hazardous material shall receive immediate attention to prevent escape to drain, surface water or land. Spilled material shall be disposed of in an appropriate manner. Kits for the collection of liquid and powder spills shall be available on site at strategic locations.
- 2.5.6 Small leaks or spills shall be cleared up immediately by the application of absorbent materials. All used absorbent materials shall be disposed of hazardous waste at facilities permitted to accept such waste. Transfer of this waste shall be carried out as per conditions in Section 3 of this permit.
- 2.5.7 The operator shall have in storage an adequate supply of suitable absorbent material to absorb any spillage.

### **3 Closure and Decommissioning**

- 3.1 In the event of cessation of operations on the site, all wastes, equipment and hazardous materials (including fuels and 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 immediately upon a decision being taken to cease business activity. In the case of full decommissioning, applicant shall submit a decommissioning plan in accordance with the terms of reference provided by the Authority for approval by the relevant Authorities. The obligations arising from the permit shall subsist until the Authority confirms in writing that the implementation of the decommissioning plan has been implemented to its satisfaction.
- 3.2 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.
- 3.3 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 the remedial action, rehabilitation, and monitoring of the waste management or waste production site.
- 3.4 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.

### **4 Records**

- 4.1 The Operator shall ensure that all records required to be made by this Permit and any other records made by it in relation to the operation of the Permitted Installation shall:
- a) Be made available for inspection by the Authority upon request;
  - b) Be supplied to the Authority on demand and without charge and in the format requested;
  - c) Be reasonably legible;
  - d) Indicate any amendments which have been made and shall include the original record wherever possible; and
  - e) Be retained at the Permitted Installation or accessed electronically from the Permitted Installation, for a minimum period of 4 years from the date when the records were made, unless otherwise agreed in writing.
- 4.2 A daily operations log should be kept on site in which the following information shall be recorded on a daily basis:
- a) Any incidents that took place on site such as mechanical faults in the machinery or equipment used on site, any spills, fires, etc. and the remedial action taken.
  - b) Any maintenance and inspections carried out on machinery and equipment
  - c) Any defects or damage to the Site Security System
  - d) Any other incidents that the permit holder deems important to record
  - e) Total amount of waste in kilos removed from site for disposal or further treatment.
- 4.3 Each record shall be compiled within 24 hours of the relevant event. The records kept in the daily operations log shall be available for inspection at any time when the Authority representatives request to inspect them.
- 4.4 The Operator shall maintain a record of the skills and training requirements for all staff whose tasks in relation to the Permitted Installation may have an impact on the environment and shall keep records of all relevant training.
- 4.5 So as to assist the operator in complying with these permit conditions and formalising procedures required by this permit, the Authority recommends the establishment of an

Environmental Management System (EMS). An EMS can take the form of a standardised system (e.g. EN ISO 14001:1996 or EMAS) or a non-standardised ("customised") system, provided that is properly designed and implemented. Guidance for a non-standardised ("customised") system is included in Schedule 3 of this permit.

## **5 Reporting**

- 5.1 The Operator shall submit to the Authority an Annual Environmental Report (AER) of the previous year by not later than end of March of each year, providing the information listed in Schedule 1 of this Permit and in the format specified therein.
- 5.2 The Operator shall notify the Competent Authority immediately on becoming aware of any factor that has prevented or may prevent compliance with any of the conditions of this permit. Details of the factor and why compliance has been or may be prevented shall be provided.

## **6 Ozone Depleting Substances and Fluorinated Greenhouse Gases**

- 6.1 No new equipment or components (including refrigeration and firefighting equipment or insulation foam) containing substances falling within the scope of EC Regulation No. 1005/2009 on substances that deplete the Ozone Layer & S.L. 549.58, Substances depleting the ozone layer regulations shall be installed within the site.

## **7 Management and Technically Competent Person**

- 7.1 All employees authorised by the Permit Holder to undertake activities on his/her behalf, shall be fully conversant with the obligations of this permit and shall be individually aware of their responsibilities and liabilities in observing the conditions of this permit.
- 7.2 One member of the staff should be nominated as the Technically Competent Person (TCP) of the site, whereby this person is to physically represent the Permit Holder during the times when the Permit Holder will not be available.
- 7.3 The TCP is responsible for the implementation of all the obligations stipulated in this permit, must supervise the rest of the staff on site and is completely responsible to ascertain that all permit conditions are being adhered to and that unauthorised waste does not enter the site.
- 7.4 The TCP is to be present at all times on site and in her/his absence another member of staff is to substitute him/her temporarily. In the event that a TCP terminates her/his employment, another person shall be appointed as a TCP immediately and the Authority shall be informed of this change.
- 7.5 In the event of any short or long periods of sick leave or vacation leave taken by the TCP for a period exceeding 10 days, the Operator is obliged to find a replacement for that member of staff without delay;
- 7.6 In the event where operations cease temporarily, the TCP or Permit Holder are obliged to notify the Authority within two (2) days and are also to inform the Authority with regards to when the works are intended to resume.
- 7.7 All the staff on site should be fully aware of the procedures to be taken to contain any environmental hazard which may arise related to the activities being carried out on site.

## Schedule 1

### Annual Environmental Report

**Important note**

By this submission, you confirm that you give your explicit consent for the entire contents of this Annual Environment Report to be made available on the Authority's public website.

**S1.1 Introduction**

Environmental Permit Number	
Reporting Year (Calendar Year: 1 January to 31 December)	
Name and locality of Site	
Brief description of activities at the site	

**S1.2 Fuel Consumption Data**

Equipment <sup>1</sup>	Fuel type	Sulphur Content of Fuel <sup>2</sup>	Fuel Consumption	Units
				tonnes
				tonnes
				tonnes
				tonnes
				tonnes

**S1.3 Off-site transfers of hazardous waste**

Date of transfer	EWC Code <sup>3</sup>	Quantity of waste (in kg)	Consignment note number and/or TFS (Transfrontier Shipment of waste) reference number	Ultimate destination

**S1.4 Transport of Waste**

Name(s) of registered waste carrier used during reporting year	Waste type(s) transported

<sup>1</sup> E.g. Boiler, generator, vehicles, etc.

<sup>2</sup> Specify units (e.g. as percentage, or mg/kg)

<sup>3</sup> European Waste Catalogue Code (Reference: *Commission decision 2000/532/EC establishing a list of wastes*)



### S1.7 Submission of Certifications and Documentation

Condition Number	Documentation
1.5.1	Improvement Programme Items as per Table 1.5.1
2.1.5	Certification of Standby Generator, diesel fire-pump and LPG-Fired furnace as per Table 2.1.2.
2.2.21	Certification for oil interceptor.

### S1.8 Characterisation of discharges to the marine environment

Total volume discharged:

E1 ----- m<sup>3</sup>

	Emission Point Reference	Limit Value	Standard methodology used	Total number of exceedances <sup>1</sup>	Concentration (Annual Average)	Unit	Total Annual Load	Unit
pH	E1	6-10						
Temperature		8°C above ambient				°C	NA	NA
Total Petroleum hydrocarbons		5				mg/L		kg
Total Suspended Solids		35				mg/L		

<sup>1</sup> If the total number of exceedances exceeds 0, the value of each of these exceedances (for the reporting year) must be submitted in a separate report, together with action taken to regularise the situation.

**Applicant's declaration**

*I declare that, to the best of my knowledge, all the above information is correct and substantiated.*

.....  
**Name**  
*(in block letters)*

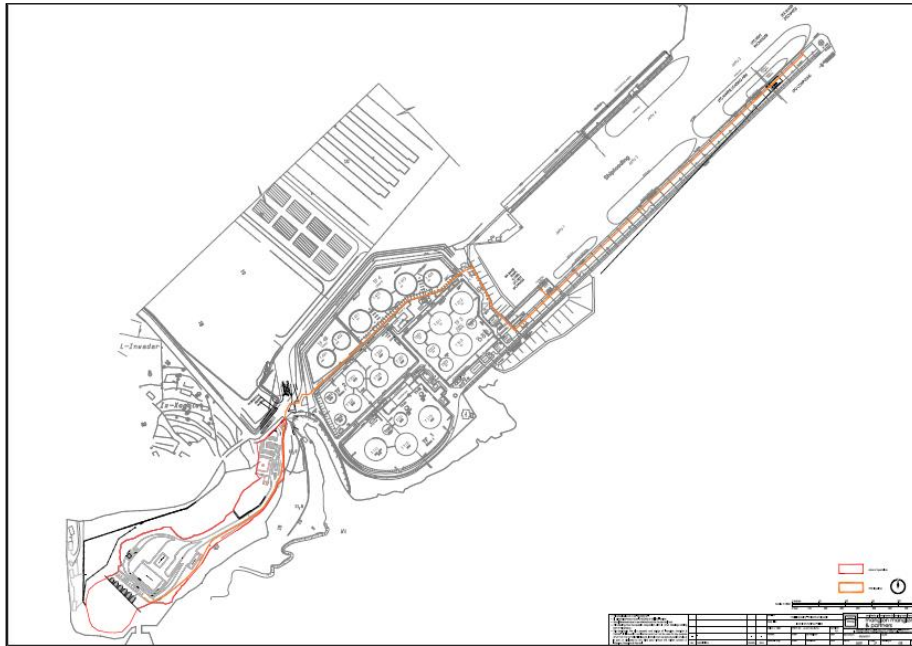
.....  
**ID Card Number**

.....  
**on behalf of / in my own name**  
*(in block letters)*

.....  
**Signature**

.....  
**Date**

## Schedule 2 Site Map



**Fig. S2.1: Site of permitted installation, showing the extent of the area in red and orange for the carrying out of the activities specified in condition 1.1.1. The extent of the site boundary is indicative and should not be used for interpretation purposes.**

### Schedule 3

## Minimum requirements for an Environmental Management System (EMS)

#### 1. **Management and Reporting Structure**

This should in particular include the name of the person who will be responsible for managing environmental aspects of the installation. Relevant qualifications and experience should be listed, together with contact details (including a mobile number for emergency purposes).

#### 2. **Environmental Objectives and Targets**

The section should include a review of all operations and processes, a commitment by the operator to continuous improvement, and identification of priority areas where improvement to the operations is necessary and practicable, such as:

- a. recycling of materials;
- b. minimisation of waste;
- c. efficient use of resources (especially water and energy);
- d. use of biodegradable chemicals;
- e. minimising use of solvents;
- f. procedures to minimise noise disturbance to neighbours;

Targets should be set for priority areas identified (e.g. minimising waste generation by \_\_\_% annually).

#### 3. **Environmental Management Programme (EMP)**

This should include a time schedule for achieving the Environmental Objectives and Targets prepared under point 2 above. The time schedule should cover a period of 5 years. The EMP should include:

- a. designation of responsibility for targets;
- b. the means by which they may be achieved;
- c. the time within which they may be achieved.

Targets and performance should be reviewed annually as part of the EMS.

#### 4. **Documentation**

A system of documentation should be established to ensure that records are kept of the priority areas chosen according to point 2. In addition, the operator should issue a copy of the environmental permit to all relevant personnel whose duties relate to any condition of the permit.

#### 5. **Corrective Action**

The operator should establish procedures to ensure that corrective action is taken should the specified requirements of the environmental permit not be fulfilled. The responsibility and authority for initiating further investigation and corrective action in the event of a non-conformity with the environmental permit should be defined.

#### 6. **Awareness and Training**

The operator should establish and maintain procedures for identifying training needs, and for providing appropriate training, for all personnel whose work can have an effect on the environment. Appropriate records of training should be maintained.

#### 7. **Maintenance Programme**

The operator should establish and maintain a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing should support this maintenance programme. The licensee should clearly allocate responsibility for the planning, management and execution of all aspects of this programme to appropriate personnel.

END OF PERMIT