



# Case Officer Report

**Subject:** IP 0006/13 - Application for the operation of an installation for temporary storage and processing of hazardous and non-hazardous waste in Hal-Far.

**Date:** 10<sup>th</sup> December 2020

**To:** ERA Board

**From:** Environment and Resources Directorate

**Case Officer:** Christina Pisani

## 1. Background

This report has been prepared for the determination of IP 0006/13 for the operation of an installation for temporary storage and processing of hazardous and non-hazardous waste submitted by Charles Galea o.b.o. WEEE Recycle 4U Co. Ltd. In this regard, the application was received on 09<sup>th</sup> July 2013 and a consolidated application was submitted on 01<sup>st</sup> September 2020.

## 2. Case Officer Report

### 2.1 Proposal

The permit falls under the remit of Regulation 7 of the Industrial Emissions (Framework) Regulations, 2013 (S.L.549.76) (“the Industrial Emissions (Framework) Regulations”) to operate an installation carrying out activities covered by the description in 5.5 in Schedule 1 of the Industrial Emissions (IPPC) Regulations (S.L.549.77), to the extent authorised by the Permit, i.e.

“Temporary storage of hazardous waste not covered under point 5.4 pending any of the activities listed in points 5.1, 5.2, 5.4 and 5.6 with a total capacity exceeding 50 tonnes, excluding temporary storage, pending collection, on the site where the waste is generated.”

Activity	Description of specified activity	Limits of specified activity
Section 5.5: Specified activities involving the disposal, recovery and temporary storage of	Receipt, manual dismantling and storage of general WEEE as per Schedule 3a. Crushing of non-hazardous components.	From receipt of WEEE to dispatch to authorised facilities either locally or abroad.

specified Waste Electric and Electronic Equipment (WEEE).	Processing of the following WEEE: CRT televisions, monitors, cables, heaters, toner cartridges, fluorescent tubes and bulbs and related sorting, management and storage of separated components.	From receipt of specified WEEE to processing in dedicated areas as per <b>IP 0006/13/DOC1</b>
	Storage and packaging of batteries, fridges and freezers.	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.
	Degassing and further treatment of certain equipment containing refrigerant gas excluding fridges and freezers	From the receipt of certain equipment containing refrigerant gas to the exportation or local selling for reuse of refrigerant gas.
Segregation and storage of WEEE-related packaging.	Segregation from WEEE and storage of WEEE-related packaging consisting of paper/cardboard, plastic and mixed packaging.	From receipt packaged WEEE to dispatch of segregated packaging waste to authorised local facilities.
Storage and processing of wood items.  End of Waste activity for animal bedding	Storage and processing of wood waste in designated areas.  Use of crusher to process non-hazardous waste wood.	From receipt of wood waste until (1) either dispatch offsite as waste or (2) dispatch of finished product offsite following approval in writing by the Authority.  Waste wood 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 wood that does not 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 1.6.1
Associated activity of general maintenance and repairs	Maintenance and repair/s on equipment and/or vehicles within the installation.	From maintenance/repair, activity to appropriate recovery/disposal of any waste generated on site.

## Proposed Emissions and Mitigation

Table 1 : Emission points		
Emission point reference	Source	Mitigation Measures
PS1	Florescent tube crushing room	Carbon & HEPA filters Pressure differential recorder Real-time mercury emissions monitor
PS2	CRT crushing room	HEPA filter Pressure differential recorder
PS3	Cable Crusher & Main Crusher	HEPA filter
E1	WEEE treatment building	Carbon filter

E2	Fluorescent tube crushing room	Sand filter Carbon filter
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<b>Table 2: Emission limits and monitoring</b>			
<b>Emission point reference</b>	<b>Parameter</b>	<b>Limit</b>	<b>Minimum Monitoring Frequency</b>
PS1	Mercury (Hg)	2 µg/Nm <sup>3</sup>	Every 3 months
PS1-3	Dust	5 mg/Nm <sup>3</sup>	Every 6 months
PS3	Dioxin-like PCBs	-	Every year
PS3	Brominated flame retardants	-	Every year
PS3	Metals and metalloids	-	Every year
PS3	PCDD/F	-	Every year
E1 & E2	pH	6-10 pH	If discharged to sewer
	Total Suspended Solids (TSS)	500 mg/L	
	Chloride	1000 mg/L	
	Hydrocarbon oil index (HOI)	10 mg/L	
	Arsenic (expressed as As)	0.05 mg/L	
	Boron	2 mg/L	
	Cadmium (expressed as Cd)	0.05 mg/L	
	Chromium (expressed as Cr)	0.15 mg/L	
	Copper (expressed as Cu)	0.5 mg/L	
	Lead (expressed as Pb)	0.1 mg/L	
	Nickel (expressed as Ni)	0.5 mg/L	
	Mercury (expressed as Hg)	5 µg/L	
	Silver	5 mg/L	
	Zinc (expressed as Zn)	1 mg/L	
	Total Non-ferrous metals	30 mg/L	
	Total Phosphorus	20 mg/L	
Biological Oxygen Demand (BOD)	500 mg/L		
Chemical Oxygen Demand (COD)	1000 mg/L		
Total Petroleum Hydrocarbons (TPH)	5 mg/L		

## 2.2 Supporting documents recommended for approval

- Documents: IP 0006/13
- Drawing Number: IP 0006/13/DOC1
- Documents: IP 0006/13/DOC2
- Documents: IP 0006/13/DOC3

## 2.3 Applicable law/ policy

The proposal is to comply with:

- Environment Protection Act (CAP. 549);
- Industrial Emissions (Framework) Regulations (S.L. 549.76)
- Industrial Emissions (Integrated Pollution Prevention and Control) Regulations (S.L. 549.77)
- The Waste Regulations (SL 549.63)
- Waste Management (Electrical And Electronic Equipment) Regulations (SL 549.89)

- Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing **best available techniques (BAT) conclusions for waste treatment**, under Directive 2010/75/EU of the European Parliament and of the Council

## 2.4 Site Description and Constraints

The site is within the Hal-Far industrial estate.

## 2.5 Site History

The following permitting history is noted on site:

Number	Title	Status
EP 0033/18/A	Operation of non-hazardous waste treatment and hazardous waste storage facility	Granted on 29 <sup>th</sup> March 2019 for a period of 2 years
EP 0129/20	Renewal and variation of EP 0033/18/A	Granted on 15 <sup>th</sup> December 2020 for a period of 4 years
PA/00441/16	Removal of dumped material & construction of industrial unit for the recycling /treatment of WEEE.	Granted 6 <sup>th</sup> October 2016
PA/05335/18	Proposed Alterations and extension to development approved by PA 0441/16. Extensions consists of daily storage & fleet maintenance garage	Granted 19 <sup>th</sup> October 2018
PA/06212/19	Proposed extension to development already approved by PA 5335/18, including store and refrigeration recycling area. Application also to include to sanction shifting & extension of garage Class 5B.	Granted 12 <sup>th</sup> June 2020

## 2.6 Consultations

### i. Intra-ERA Feedback

Slight amendments were made to trans-frontier shipment permit condition wording.

During processing of the application, the Ambient Quality and Waste Unit required clarifications on the various waste streams being treated on site, which were provided by the applicant or addressed through permit conditions.

Provided updates to noise monitoring terms of reference. Schedule 4 of the permit was updated accordingly.

The site was operating under EP 0033/18/A which has since been superseded by EP 0129/20 ('Waste management related to WEEE'). During the last inspection carried out on 14<sup>th</sup> August 2020, the Compliance and Enforcement Directorate noted that the main non-compliance observed was the storage of some WEEE and WEEE components outside of the building. CED has formally instructed the Applicant to move all such wastes back inside. The Applicant had complied within 30 days.

There were no complaints on the site since commencement of operations.

## ii. **Feedback from External y Consultees**

The Environmental Health Directorate (EHD ,) along with AQWU (ERA) commented about the potential noise and air emissions originating from the site which were addressed through permit conditions.

The Civil Protection Department (CPD) commented about the site's fires safety precautions. Other statutory consultees provided generic feedback which was addressed through amendments in the application, recommended conditions or both. CPD provided a document describing in detail all CPD operational requirements relating to WEEE handling and fire safety. The document was added as an approved document (IP0006/13/DOC3) and is to be enforced by CPD.

## iii. **Feedback from the Applicant**

Consultation regarding the permit was carried out with the Applicant following which comments were received by the Authority.

Most comments were in relation to clarification of condition applicability and wording. Updated approved documents were provided as requested by the Authority. Some updates to pre-operational conditions were made. A response to all the applicant's queries was provided separately.

## **2.7 Representations from public**

- i. **Public consultation dates:** 13<sup>th</sup> June 2019 – 13<sup>th</sup> July 2019;
- ii. **Responses received:** Birzebbuga Environmental Action Group (BEAG)

The comments made by BEAG were in relation to: fire safety, competence of the TCP, on-site activities, waste handling, cesspit certification, layout plans and records. Following the responses provided by the Applicant and ERA to BEAG on 26<sup>th</sup> September 2019, no further comments were received. Full details are available in Appendix 1.

## **2.8 Discussion**

The Regulatory consultation was carried out between the 09<sup>th</sup> December 2015 and 08<sup>th</sup> January 2016, following which a number of further clarifications were requested to be submitted by the Applicant. A public consultation on the IPPC application was carried out between 13<sup>th</sup> June 2019 and 13<sup>th</sup> July 2019. Feedback was received from the Birżebbuġa Environmental Action Group.

The IPPC application included the submission of a baseline study aimed at determining the land and groundwater status across the site. No pollutants were found at significant concentrations in the samples taken. Further land and groundwater investigations will be requested upon site closure so as to verify that no contamination has resulted during the operation of the installation.

The application is in line with Best Available Techniques for Waste Treatment Industries (BATC-WTI), to the extent that a revision of BAT assessment document was made upon the publication of revised BATC-WTI in 2018. However, upon site inspection held on 14<sup>th</sup> November 2019, it was observed that the site was operating with numerous deviations from the application and the issued Environmental Permit. As a result, various updates to site layout plans were requested and submitted on the 13<sup>th</sup> January 2020.

In view of potential indirect discharge to water bodies arising from effluents generated from fluorescent tube crushing and the general WEEEE treatment building, effluent monitoring and associated emission limit values of such discharge are being proposed.

The application was scheduled for a decision in March 2020 at which time, the applicant was requesting the inclusion of the treatment of 2 waste streams (oil heaters & toner cartridges including toner powder) after all regulatory consultations had been carried out. The directorate was not of the opinion to include such waste streams at said time of the application process. However, due to restrictions on public gatherings in affect in March 2020, the Decision in Public could not be made. In the interim, an updated application, including the additional waste streams, was submitted and regulatory consultation was carried out again between 22<sup>nd</sup> July and 05<sup>th</sup> August 2020.

Furthermore, should the IPPC permit be favorably determined, the current Environmental Permit (EP 0129/20) will be superseded.

## 2.10 Financial Matters

Application Fee	€ 10,000 - paid
Financial guarantee	€ 32,775
Annual Fee	€ 500

### 3. Environment Officer Recommendation:

The Environment and Resources Directorate recommends the GRANTING of the Permit for a period of four (4) years subject to the following conditions as post decision requirements:

- Submission of bank guarantee of € 32,775

- Annual fee of € 500 covering the period January 2021 - January 2022 covering the first year of operation (half the annual fee prescribed in S.L. 549.77 due to ISO 14001 certification)

The proposed permit conditions include:

- Standard conditions for this sector;
- Site-specific conditions
  - Fluorescent tube and CRT crushing to be conducted in designated areas
  - Toner dismantling to be carried out in designated equipment
  - Degassing of refrigerant equipment (excluding fridges and freezers) and maintenance of degassing equipment is carried out according to BAT and in a manner to minimize emissions to air
  - Fridges and freezers may only be permitted into the facility for storage pending export. Degassing of such WEEE is not permitted
  - Prescribed methods of WEEE treatment in accordance to BAT Conclusions
  - Pre-operational conditions:
    - Certification of industrial effluent cesspit.
    - No crushing of wood in non-hazardous crusher prior to verification that wood is non-hazardous by analytical analysis from accredited lab.
    - No wood end-of-waste activities prior to ERA confirmation of achievement of end-of-waste status of product.
    - ERA confirmation and approval of installation, including filter media, of the following equipment:
      - Calibration certificate for the real-time monitoring equipment used for Mercury (Hg) leak detection
      - Crushing of cables
      - Shredding of non-hazardous waste
- Improvement programme items:

Reference	Requirement	Deadline
1	Physical delineation and signage of all waste storage areas as per site layout plan submitted as part of IP 0006/13/DOC1 and the IPPC application.	Within 1 month from the date of granting of the permit.
2	Certification from a competent company or engineer that the relevant fire safety procedures and equipment are in place, including emergency firefighting water supplies for use by the Civil Protection Department.	Within 1 month of granting of the permit.
3	Certification by an independent warranted civil engineer or engineer that the oil/ water interceptor has been constructed in accordance	Within 3 months of the granting of the permit.

	with EN 858, including inspection of the efficiency of operation.	
4	<p>a. As per Condition 2.4.35, Submission of a plan outlining how degassing of refrigeration equipment will be carried out in a manner to minimise emissions to air.</p> <p>b. Implementation of the plan indicated in 4a.</p>	<p>a. Within 3 months from the granting of this permit.</p> <p>b. Within the timeframe as agreed with the Authority.</p>
5	<p>a. Submission of a consolidated method statement for monitoring of in accordance with condition 2.2.4 &amp; 2.2.5.</p> <p>b. Submission of monitoring results in accordance with the approved method statement as per item 5a above.</p>	<p>a. Within 6 months from the granting of the permit.</p> <p>b. Within 3 months from the Authority's approval of the method statement referred to in No. 5 a) above, but not later than 6 weeks from the Authority's approval referred to in condition 1.6.4 a-c.</p>

<b>This report [to the ERA Board] has been prepared, reviewed and endorsed by:</b>	
<b>Case Officer: Christina Pisani</b>	<b>Reviewed by: Simon Farrugia</b>
Asst. Env. Protection Officer	Senior Env. Protection Officer (Permitting)
Signature:	Signature:
Date: 10 <sup>th</sup> December 2020	Date: 10 <sup>th</sup> December 2020
<b>Endorsed by: Nathalie Ellul</b>	
Team Manager (Permitting)	
Signature:	
Date: 10 <sup>th</sup> December 2020	