

IP 0001 / 13 / V2  
DDE Attard Ltd  
Variation of IPPC Permit  
IP 0001 / 13

Environmental Permitting Unit  
Environment and Resource Authority

# Site Location



Scrap Lane, Valletta Road, Luqa

# Current Permitted Activities on Site

- ▶ Treatment of **waste vehicles** (once a number of infrastructural items are built and certified)
- ▶ Dismantling of **washing machines, cookers and water meters**
- ▶ Processing of **metals**, including shredding and pressing
- ▶ Baling of **tyres** (max. 50 tonnes) and bumpers
- ▶ Stripping of **cable wires**

# Current Permitted Activities on Site

- ▶ **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
- ▶ Operation of a **composter** for food waste and end-of-waste activity for compost
- ▶ **Maintenance** of on-site machinery

# Applicable Legislation

- ▶ Industrial Emissions Regulations (S.L. 549.76)
  - ▶ Activity requires to be covered by a permit under Regulation 7
- ▶ Integrated Pollution Prevention & Control (S.L. 549.77)
  - ▶ Schedule 1; Activity 5.3(b)(iv):
  - ▶ “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.”

# Application Process

Detail	Date	Comment
Granting of IP 0001/13A	1 July 2020	Expires on 1 July 2024
Variation Application IP 0001/13/V1	Received on 05 March 2021	Being Processed
Variation Application IP 0001/13/V2	Received on 28 July 2021	Not 'Duly Made'
Public Consultation	Commenced on 23 September 2021	Concluded on 7 October 2021
Response to request for information including feedback from regulatory consultees	Request dated 25 October 2021	Response received on 10 February 2022
Response to request for information including feedback from regulatory consultees	Request dated 26 May 2022	Response received on 1 July 2022
Response to request for information including feedback from regulatory consultees	Request dated 11 August 2022	Response received on 1 September 2022
Consultation with Permit Holder	19 September 2022	Response detailed below
Receipt of Consolidated Application	20 October 2022	No further comments

# Proposed Changes

- ▶ Amending of Phasing Plan for the infrastructural works that need to be done on site
  - ▶ Changing order of works
  - ▶ Increasing of timeframe for works to be completed
- ▶ Operation of a temporary ELV depollution station until infrastructural works are finalised

# Proposed Changes

- ▶ Addition of EWC Code 16 01 06 (end-of-life vehicles, containing neither liquids nor other hazardous components) to the list of waste streams that can be accepted on site
- ▶ Addition of aircraft and vessels covered by existing EWC codes (and out of scope of the Ship Recycling Regulations) subject to a consignment specific method statement to be assessed and approved by the Authority.
- ▶ Removal of composter and associated activities



# Internal Consultation

- ▶ **Ambient Air Quality and Waste Unit (Waste Team)**
  - ▶ Requested minor updates to the process flow diagram used to treat ELV waste
- ▶ **Ambient Air Quality and Waste Unit (Air Team)**
  - ▶ No comments
- ▶ **Ambient Air Quality and Waste Unit (Noise Team)**
  - ▶ No comments
- ▶ **Environment Assessment Unit**
  - ▶ No comments

# Internal Consultation

## ► Compliance and Enforcement Directorate

- Recommended inclusion of a post decision requirement for the submission of the Audit Report for 2021.
- During the latest site visit, improvement noted in comparison to previous inspections
- Site organization and layout still needs to be improved
- Main non-compliance on site is related to the implementation of the hardstanding in line with the timeframes in the permit

# Internal Consultation

## ▶ Compliance and Enforcement Directorate

- ▶ Observed to have started accepting AC units onsite
  - ▶ Failed to be removed them as directed
  - ▶ €1,000 were forfeited from the bank guarantee.
  - ▶ The forfeited amount was since then reinstated.
- ▶ Final bill related to OWK0019/19, amounting to €54,750 is still outstanding and currently under appeal

# Regulatory Consultation

- ▶ **Regulator for Energy and Water Services (REWS)**
  - ▶ Comment regarding terminology used within an Improvement Programme Item.
  - ▶ Update to the IP Item is being proposed as agreed with REWS
- ▶ **Occupational Health and Safety Authority (OHSA)**
  - ▶ No objection subject to conditions
- ▶ **Environmental Health Directorate (EHD)**
  - ▶ Suggested conditions on water runoff, litter, pest control, unpredicted impacts and complaints.

# Regulatory Consultation

## ▶ Civil Protection Department (CPD)

- ▶ Indicated that the originally proposed reservoir size of 175m<sup>3</sup> was not sufficient in the case of a fire.
- ▶ Requested that a 5000l water mobile container be present on site until the main reservoir

## ▶ Planning Authority (PA)

- ▶ Indicated that the proposed extension to the shed that is to be proposed to be built in Phase 2 of the works requires planning permit, which was eventually submitted and approved.

# Regulatory Consultation

## ▶ Energy and Water Agency (EWA)

- ▶ Requested a copy of the original baseline land and groundwater contamination report.
- ▶ Baseline report had shown that the site has no impact on groundwater quality.
- ▶ Requested periodic groundwater monitoring from boreholes in the vicinity.
- ▶ Objection from applicant on groundwater monitoring
- ▶ When re-consulted, EWA did not provide any feedback
- ▶ Requirement for periodic monitoring has not been included in the proposed variation notice

# Regulatory Consultation

## ▶ Water Services Corporation (WSC)

- ▶ Enquired regarding the fate of the overflow of effluent from the oil/water interceptors
- ▶ A number of queries related to the composter.
- ▶ Since discharges to sewer are being proposed to be removed, the WSC had no further comments.

## ▶ Malta Resources Authority (MRA) and Transport Malta (TM)

- ▶ No feedback was provided

# Public Consultation

- ▶ Public Consultation dates:
  - ▶ 23<sup>rd</sup> September 2021 - 7<sup>th</sup> October 2021
- ▶ No representations were received



# Site Visit

- ▶ Site visit was conducted on the 17<sup>th</sup> May 2022
- ▶ Observed waste storage, shredding and separation
- ▶ Observed progress in infrastructural works



# Site Visit



# Proposed Changes to Conditions

- ▶ Addition of conditions related to pest control as requested by EHD
- ▶ Amended conditions related to the bank guarantee.
- ▶ Addition of Pre-Operational Condition to allow temporary acceptance and treatment of ELVs once part of the infrastructural works are finalized.
- ▶ Addition of an emission point related to a fire pump
- ▶ Removal of conditions related to composter and related monitoring

# Proposed Changes to Conditions

- ▶ Addition of conditions related to effluent monitoring
- ▶ Addition of condition requesting annual energy efficiency audit
- ▶ Addition of conditions related to land monitoring
- ▶ Addition of conditions related to acceptance of vessels and aircraft or parts thereof

# Proposed Changes to Conditions

- ▶ Addition of conditions related to acceptance of WEEE components derived from end of life vessels and aircraft
- ▶ Addition of an condition restricting acceptance of ELVs to prohibit electric and hybrid vehicles
- ▶ Addition of conditions related to fire water as requested by CPD
- ▶ Addition of EWC Codes in Schedule 3

# Proposed Updated Improvement Programme

Ref	Requirement	Deadline
2	Submission of a certificate from a third party warranted engineer or architect showing how the fuel storage tanks that will be used for the storage of fuel removed from ELVs are equipped with adequate secondary containment in line with Condition 2.5.3	Prior to the acceptance of un-depolluted ELVs
3 <sup>∞</sup>	Obtainment of all relevant authorisations from the Regulator from Energy and Water Services.	Within time frames approved by REWS
4	Certification by an independent warranted civil engineer or architect that the oil/water interceptor has been constructed in accordance with EN 858, including inspection of the efficiency of operation covering the whole area of the permitted installation	By the 30 <sup>th</sup> April 2024
5	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	By the 30 <sup>th</sup> April 2024

# Proposed Updated Improvement Programme

Ref	Requirement	Deadline
6	Notification on the completion of works in accordance with PA 4172/16 to ensure compliance with BAT	By the 30 <sup>th</sup> April 2024
7	Submission of monitoring results for the effluent monitoring carried out in line with Approved Doc IP 0001/13/V2/DOC4	Within 1 year of the granting of this variation notice
8	Implementation and submission of Noise Monitoring Survey as approved by ERA	Within time frames approved by ERA
9 <sup>∞</sup>	Certification from a competent company or engineer indicating completion of relevant fire safety procedures and equipment installation according to Approved Document IP 0001/13/A/DOC3. that the emergency firefighting water supplies for use by the Civil Protection Department are in place according to Approved Document IP 0001/13/A/DOC3	By the 30 <sup>th</sup> April 2024

# Proposed Updated Improvement Programme

Ref	Requirement	Deadline
13	Submission of a certificate from a third party warranted engineer or architect showing how the fuel storage associated with the generator is in line with Condition 2.5.3.	Before start of operation of the generator
14	Submission of a Decommissioning Report showing how the composter has been adequately dismantled, decommissioned and stored within the area indicated in Approved Document IP 0001/13/A/V2/DOC2.	Within 3 months of the granting of this variation notice
15	Installation of storage bins for lead acid batteries in line with Condition 2.4.2.14	Within 4 months of the granting of this variation notice
16	Submission of the results of the land monitoring referred to in Condition 2.2.10.1.	Within 6 months of the granting of this variation notice



# Proposed Updated Improvement Programme

Ref	Requirement	Deadline
17	Submission of an energy efficiency plan in line with Condition 2.6.1.	Within 6 months of the granting of this variation notice
18	Submission of a certificate by a warranted engineer or architect that the temporary reservoir indicated in Approved Document IP 0001/13/V2/DOC2 is in line with the requirements of Activity 43 of S.L. 549.45.	Prior to the acceptance of un-depolluted ELVs
19	Submission of a certificate by a warranted engineer or architect that the underground reservoir indicated in Approved Document IP 0001/13/V2/DOC2 is in line with the requirements of Activity 43 of S.L. 549.45	By the 30 <sup>th</sup> April 2024
20	Submission of a certificate from a third party warranted engineer or architect showing how the bund constructed within the pump room for the fuel storage associated with the fire pumps is in line with Condition 2.5.3.	By the 30 <sup>th</sup> April 2024

# Feedback from Applicant

- ▶ Consultation with the operator regarding the proposed permit conditions was carried out on the 19<sup>th</sup> September 2022.
- ▶ Comment on timeframes for improvement programmes related to hardstanding and associated infrastructure
  - ▶ Discussion between applicant and EPU
  - ▶ Agreed upon proposed deadline of 30<sup>th</sup> April 2024

# Feedback from Applicant

- ▶ Comment on timeframe of improvement programme related to REWS requirements
  - ▶ Changed to specify that deadline to be determined by REWS
- ▶ Comment on timeframe of improvement programme related to bunding of fuel associated with generator
  - ▶ Changed deadline to indicate that requirement is to be complete before operation of generator, instead of having a pre-set timeframe

# Permit Fees and Bank Guarantee

- ▶ Application Fee
  - ▶ €500 for a variation application - **Paid**
- ▶ Annual Fee
  - ▶ €500 in annual fees to cover the annual contributions for 2022-2023
- ▶ Inspection Fees
  - ▶ €400 for 2 inspections (rated at €200 per inspection)
- ▶ Bank Guarantee
  - ▶ €189,625 (as compared to the current bank guarantee of €132,725)

# ERD Recommendation

The ERD is recommending the

**GRANTING**

of the variation, **retaining the original expiry date of IP 0001/13**  
(1<sup>st</sup> July 2024), subject to the following conditions:

- ▶ Submission of an updated bank guarantee of € 189,625 (as compared to the current bank guarantee of €132,725)
- ▶ Settlement of outstanding fees amounting to €900 to cover annual fee for the period 2022-2023 and inspection costs for 2 inspections carried out to date (rated at €200 per inspection).