

Case Officer Report

Subject: IP 0001/13/V2 - Application for the variation of IP 0001/13 to amend timeframes for construction of infrastructure and adding of EWC Code 16 01 06 (end-of-life vehicles, containing neither liquids nor other hazardous components)

Date: 21st October 2022

To: ERA Board

From: Environment and Resources Directorate

Case Officer: Stefan Montebello

1. Background

This report has been prepared for the determination of IP 0001/13/V2 which is a variation IP 0001/13 to amend timeframes for construction of infrastructure, adding of EWC Code 16 01 06 (end-of-life vehicles, containing neither liquids nor other hazardous components), and removal of certain activities which will no longer be carried out . The application was submitted by Mr Daniel Attard obo DDE Attard Ltd on the 28 July 2021. A consolidated application was submitted on the 20th October 2022.

The installation is already covered by an IPPC permit which was granted on 1st July 2020 and expires on 1st July 2024.

2. Case Officer Report

2.1. Proposal

The applicant has applied for a variation to amend timeframes for construction of infrastructure, mainly hardstanding of different areas, which were agreed upon in the current permit. Moreover, the Permit Holder has also applied to add 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. The application also included a proposal to dismantle aircrafts, vessels and parts thereof, which can be classified under the EWC codes that are already permitted on site, subject to a specific method

statement for each and every dismantling operation. Furthermore, the application also proposes the decommissioning of the composter.

The activities which are proposed to be regulated through the proposed permit are the following:

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 Internal Combustion Engine (ICE) ELVs and related sorting, management and storage of separated components. Receipt, storage, dismantling and disposal of aircrafts, vessels and parts thereof subject to a Method Statement approved by the Authority	From receipt of ICE ELVs according to EWCs specified in Schedule 3 to dispatch of separated components to authorised facilities either locally or abroad, and the selling for reuse of upholstery. 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. From receipt of aircraft, vessels and parts thereof to dispatch of dismantled components for recovery to a permitted facility either locally or abroad.
Temporary storage and dismantling of specified types of WEEE as per Condition 2.4.1.6	Receipt, temporary storage & dismantling of cookers, water meters and washing machines as per Condition 2.4.1.6.	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 copper and plastic destined for recycling.	From receipt of waste wires to dispatch of separated copper and plastic casing for recycling to a permitted facility either locally or abroad.
Storage and processing of clean scrap metal and wood	Receipt, storage and processing of scrap metal and wood in designated areas. Use of shredder to process waste metal and wood.	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 processed 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 Approved Document IP 0001/13/A/V2/DOC2 .	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.
Fuel storage and refuelling of the company's heavy plant trucks and equipment.	Storage and refuelling of heavy plant vehicles, own private vehicles, standby generator, hydraulic-press and fire-pump 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 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.

2.2. Proposed Emissions and Mitigation

Emission Source	Receptor	Mitigation
Hydraulic Press	Air	N/A
Standby Generator	Air	N/A
Fire Pump	Air	N/A
Reservoir Overflow	Land	Oil/water interceptor and annual monitoring

2.3. Supporting documents recommended for approval

2.3.1. Documents:

- IP 0001/13/V2
- IP 0001/13/A/V2/DOC1
 - Shall replace IP 0001/13/A/DOC1
 - Refers to updated flowcharts who show the process of waste treatment of the different waste streams
- IP 0001/13/A/V2/DOC4
 - Refers to a method statement for the monitoring for the proposed discharge to land
- IP 0001/13/A/V2/DOC5
 - Refers to a method statement for the monitoring for the proposed land monitoring
- IP 0001/13/A/V2/DOC6
 - Refers to a method statement for the monitoring for the noise monitoring study

2.3.2. Drawing Numbers:

- IP 0001/13/A/V2/DOC2
 - Shall replace IP 0001/13/A/DOC2
 - Refers to a site layout plan and a drainage plan

There are no changes to the approved document IP0001/13/A/DOC3.

2.4. Applicable law/ policy

The installation carries out of activities which fall within scope of the Industrial Emissions (Integrated Pollution Prevention and Control) Regulations, in particular 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.”

The proposal is to comply with:

- 2.4.1. Environment Protection Act (CAP. 549);
- 2.4.2. Industrial Emissions (Framework) Regulations (S.L. 549.76)
- 2.4.3. Industrial Emissions (Integrated Pollution Prevention and Control) Regulations (S.L. 549.77)
- 2.4.4. 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

2.5. Site Description and Constraints

The site is located in Valletta Road, Luqa and has been operating since the early 1950s. Site lies within an area of containment and is adjacent to a number of other industrial facilities, including another waste management facility which falls within scope of S.L. 549.77. The site lies within 200m of the grounds of St Vincent de Paul Hospital and within 250m of the closest residential units.

2.6. Site History

The following permitting history is noted on site:

Number	Title	Status
WM 0009/06/K	Environmental Permit for the operation of a scrapyard	Granted on the 14 March 2016
IP 0001/13/A	IPPC Permit to operate an installation for temporary storage and processing of hazardous and non-hazardous waste	Granted on 1 July 2020 for a period of 4 years
PA 5538/07	Proposed upgrading of existing scrapyard (scrapyard has been in operation for over 50 years).	Granted on 31 October 2013

	Proposal includes construction of boundary fence; installation of weigh bridge and tyre cleaning facility; paving of site; and landscaping work	
PA 1876/15	Amendments to approved PA 5538/07 to include composter shed and equipment.	Granted on 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 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.	Granted on 14 November 2018 Minor amendment granted 21 July 2022

2.7. Consultations

2.7.1. Intra-ERA Feedback

An internal consultation was carried out on the application. Comments received were related to waste issues where minor updates to the process flow diagram used to treat ELV waste were requested.

Compliance status was also provided by the Compliance and Enforcement Directorate and recommended inclusion of a post decision requirement for the submission of the Audit Report for 2021. The Directorate also provided the below feedback:

- As of the last inspection in May 2022, the site has improved in comparison to previous inspections, however the site organization and layout still needs to be improved. The main non-compliance on site is related to the implementation of the hardstanding in line with the timeframes in the permit which the pending variation is seeking to address.
- The Permit Holder was observed to have started accepting AC units onsite. The Permit Holder failed to remove them as directed and hence €1,000 were forfeited from the bank guarantee. The forfeited amount was since then reinstated.
- A status update of the improvement programme items
- The final bill related to OWK0019/19, amounting to €54,750 is still outstanding and currently under appeal

2.7.2. Feedback from External consultees

The **Occupational Health and Safety Authority (OHSA)** did not have any objection to the variation application and provided conditions.

The **Regulator for Energy and Water Services (REWS)** indicated that it is in direct communication with the applicant in order to register the fuel storages and obtain the required authorisations. REWS did not object to this variation but did include a comment regarding incorrect terminology used within an Improvement Programme Item. This has been tackled by updating the wording of this Improvement Programme Item, to which REWS had no further comments.

The **Water Services Corporation (WSC)** enquired regarding the fate of the overflow of effluent from the oil/water interceptors whilst also asking a number of queries related to the composter. The queries were followed up accordingly and since discharges to sewer are proposed to be removed, the WSC had no further comments.

The **Environmental Health Directorate (EHD)** provided a number of requirements related to a number of issues, which are being proposed to be included as permit conditions:

- Management of water runoff or during operations;
- Mitigation measures in relation to air, noise and vibration to avoid nuisance to sensitive receptors in the Area of Influence and to the general public;
- Site impermeability;
- Treatment of process water to prevent Legionella;
- Pest Control;
- Conditions related to use of second-class water;
- Use of adequate potable water intended for human and personal consumption;
- Drainage system is to be according to local legislation;
- Immediate action by the applicant should unpredicted impacts and nuisances arise which may have an adverse effect on public health including the adoption of necessary mitigation measures;
- Records of complaints made by the public are to be made available to the Competent Authorities when requested.

The applicant has taken note of the conditions requested and these have been reflected as applicable in the proposed variation notice.

The **Energy and Water Agency (EWA)** requested a copy of the original baseline land and groundwater contamination report. EWA also requested periodic groundwater monitoring from boreholes in the vicinity. The applicant objected to this since the baseline report had shown that the site has no impact on groundwater quality since until such time that hardstanding is complete, all hazardous waste shall be handled in a covered area with impermeable flooring. When re-consulted, EWA did not provide any feedback and therefore this requirement has not been included in the proposed variation notice.

The **Civil Protection Department (CPD)** were in direct communication with the applicant. However, CPD indicated that the originally proposed reservoir size of 175m³ was not sufficient in the case of a fire. CPD also requested that a 5000L water mobile container be present on site until the main reservoir is built and operational. The applicant increased the size of the proposed main reservoir to 240m³ and confirmed that the mobile container will be present.

The **Planning Authority (PA)** indicated that the proposed extension to the shed that is to be proposed to be built in Phase 2 of the project, requires planning permit. The applicant applied for a minor amendment and no further comments were received from the PA.

The **Malta Resources Authority (MRA)** and **Transport Malta (TM)** did not provide any feedback on this application.

2.8. Representations from public

2.8.1. Public consultation dates: 23rd September 2021 – 7th October 2021

2.8.2. Responses received: N/A

2.9. Discussion

The application being considered has been submitted by Mr Daniel Attard on behalf of DDE Attard Ltd on the 28 July 2021. The application is a variation of IP 0001/13 to amend timeframes for construction of infrastructure and adding of EWC Code 16 01 06 (end-of-life vehicles, containing neither liquids nor other hazardous components).

The proposed activities fall within scope of the activity 5.3(b)(iv) stipulated under Schedule 1 of the Industrial Emissions (Integrated Pollution Prevention And Control) Regulations, S.L. 549.77:

“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.”

The applicant requested a change in the phasing plan for the paving of the area with hardstanding. These works include the paving of the area with hardstanding and geotextile membrane in order to be in line with BAT. The change included an extension to the timeframes which would see the project finalised within 3 years and 4 months in order to allow for post-pandemic financial recovery. This requested timeframe extended beyond the validity of the permit IP 0001/13, which expires on the 1st July 2024. Following discussion with the applicant, the proposal was updated to indicate that such works would be ready by the 30th April 2024, which is within the validity of the permit. As part of the application, an expenditure plan for the facility was also provided in order to substantiate the Permit Holder’s financial capability to complete the infrastructural work. The current permit also includes a financial guarantee related to the completion of this works. This is being proposed to be retained.

Since the granting of the original permit, the Directorate was faced with a number of queries, both from the applicant and from other authorities related to the acceptance of parts of vessels and aircraft on site. This was clarified through proposed conditions in this variation notice. It is now being clarified that the applicant may carry out dismantling operations of vessels and aircraft and accept waste from such operations subject that each and every dismantling operation would require a specific method statement to be submitted to and approved by the Authority, and that only wastes falling under the waste codes already included in the permit would be able to be accepted on site. The method statement would need to be submitted prior to commencement of dismantling or acceptance of the waste. Moreover, vessels to be accepted on-site is limited to those outside the scope of the Ship Recycling Regulations (Regulation (EU) No 1257/2013).

As part of the application process, a Best Available Techniques (BAT) assessment against the updated waste treatment BAT conclusions was undertaken due to the publication of new BAT conclusions since the granting of the current permit. The updated BAT conclusions will, in the most part, be implemented as part of the proposed operations and updated specific permit conditions that are being proposed in the variation notice to ensure adherence to BAT requirements. In cases where deviations from BAT have been indicated by the applicant, justifications for such deviations have been provided and other techniques that achieve the same level of treatment required by BAT are being proposed. These have been assessed by the directorate and confirmed to be acceptable.

In terms of land and ground water risk assessment, the IPPC Regulations require operators to carry out a baseline report in line with the European Commission Guidance to determine the state of the land and groundwater. Such monitoring had been done as part of the original application. In order to ensure that operations do not contribute to further contamination, especially since the area is not yet covered with adequate hardstanding, the Directorate is proposing that land monitoring is carried out once a year. The baseline report had indicated that the groundwater in the area is too deep to be affected by the land pollution from the installation in view of the fact that pollutants did not reach the lower levels of land samples taken at the installation. Thus, groundwater investigations had not been carried out at that time. During the consultation process of this variation, EWA had requested that groundwater monitoring takes place. The applicant objected to the inclusion of groundwater monitoring based on the abovementioned reasoning. EWA did not provide any further feedback to the applicant's reply and therefore the requirement was not included in the proposed variation notice, in line with the baseline report.

A number of statutory consultations were carried out during this application. Whilst a number of entities/authorities provided feedback (as detailed above), no objections were received from. A public consultation was held in the same period and no comments were received. Internal consultations were also carried out. A post decision requirement related to reporting obligations was suggested. The directorate is not including the post decision requirement related to reporting in its recommendation since it is not related to the proposal. The reporting obligations will continue to be followed by the respective team and addressed as part of the renewal if the submission is still pending at that time. The outstanding fine related to an enforcement action is currently under appeal.

A site visit was conducted on 17 May 2022 during which the normal operation on site were observed. Construction of sheds and installation of the hardstanding was observed to be in progress. The

applicant provided an overview of the shredding and sorting processes carried out on site. The applicant also showed ERA officers how the temporary depollution of end of life vehicles will take place in a covered area over hardstanding instead of the previously permitted composter. The composter will now be decommissioned and moved to another location on-site prior to it being dismantled. It was verified that such composter was clean and empty of any waste since it was not in use for a very long time and no related odours were perceived.

Following assessment by the directorate, the applicant provided minor updates to the method statements for effluent and land monitoring related to the storage containers for samples and for appropriate laboratory accreditation. These were also provided and the updated documents are being recommended to be included as approved documents.

In terms of the Improvement Programme item, the below table gives an update on each item:

Reference	Requirement	Comments
1	To provide WSC the required information in order to obtain the sewer discharge permit ∞	N/A
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	Reworded for clarity and divided due to different timeframes proposed
3	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: a) For petrol – a tank not exceeding 270 litres as approved by a competent person, as described within the same regulations b) For EN 590 diesel: i. 8,000 litre tank for on-site vehicle and equipment refuelling, ii. 270 litre tank for storage of diesel generating by the ELV depollution process iii. 220 litre tank built-in the standby generator as approved by a competent person ∞	Reworded as per consultation with REWS. Timeframe to be determined by REWS.
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	Proposed change to timeframe in this variation.
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	Proposed change to timeframe in this variation.

6	Notification on the completion of works in accordance with PA 4172/16 to ensure compliance with BAT	Proposed change to timeframe in this variation.
7	Submission of an effluent monitoring plan for the oil/water separator overflow which considers the materials handled and activities carried out on site. Submission of results obtained from the effluent monitoring exercise approved by ERA	Method statement submitted as part of the variation application and the submission of results has been retained as an improvement programme item with a new timeframe.
8	Submission of a method statement for carrying out a Noise Monitoring Survey in accordance with condition 2.2.9.4. Implementation and submission of Noise Monitoring Survey as approved by ERA	Method Statement has been submitted. It is being proposed that the study is done once the hardstanding works are completed and hence a new timeframe is being proposed.
9	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. b) Updated certificate (a) above showing completion of relevant fire safety procedures and equipment installation according to approved document IP 001/13/DOC3∞	Proposed change to timeframe in this variation.
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	Submitted and this variation includes conditions originating from the Permit Holder's reply to this BAT Conclusion.
11	Submission of certification from an independent warranted engineer that all equipment identified in Table 2.2.1.1 is in good working condition	Submitted.
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	Completed.

A number of new improvement programme items are also being proposed as listed in the directorate's recommendation below. These inclusions were necessary due to new requirements from the new BAT conclusions as well as new items originating from this variation application.

2.10. Financial Matters

Application Fee	€500 - Paid
Financial guarantee	€189,625 (currently €132,725)
Annual Fee	€500 and any fees associated with inspections at a rate of €200 per inspection

3. Environment Officer Recommendation:

The Environment and Resources Directorate recommends the GRANTING of the variation, retaining the original expiry date of IP 0001/13 (i.e. 1st July 2024), subject to the following conditions as post decision requirements:

- a) Submission of an updated bank guarantee of € 189,625
- b) 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).

The proposed permit conditions include

- a) Standard conditions applicable to this sector;
- b) Site-specific conditions:
 - Notwithstanding condition 1.6.1, acceptance, temporary storage and treatment of un-depolluted end-of-life vehicles can be carried out exclusively in the area marked in red on Figure 2 in Schedule 8 provided that:
 - a) The area described above has been rendered impermeable and has been equipped with an adequate drainage system. This shall certified as such by a third party warranted mechanical or civil engineer in line with Improvement Programme Item 5,

- b) The area described above has been equipped with an oil/water interceptor and a reservoir. Oil/water interceptor shall be certified in line with Improvement Programme Item 4 whilst the reservoir shall be certified in line with Improvement Programme Item 18,
 - c) And the submission of certification for the fuel storage tanks in line with Improvement Programme Item 2.
- The Permit Holder shall carry out annual monitoring of the emissions from the coordinates specified in Condition 2.2.8.1 according to the method statement in **Approved Document IP 0001/13/A/V2/DOC4**. Monitoring from the main reservoir is not required prior to its certification in accordance with Improvement Programme Item 19. The results of the monitoring shall be submitted together with the AER as specified in Condition 4.2.
 - Noise monitoring is to be carried out annually (or as otherwise agreed with the Authority), starting within timeframes agreed upon with the Authority, to ensure that the above limits are not exceeded. Noise monitoring shall also be carried out in accordance with **Approved Document IP 0001/13/A/V2/DOC6**.
 - Every year, the Permit Holder shall carry out land investigations from the Permitted Installation according to the method statement in **Approved Document IP 0001/13/A/V2/DOC5**. The results of the investigation shall be submitted together with the AER as specified in Condition 4.2.
 - The Permit Holder shall take all reasonable measures to ensure that the state of land contamination is safeguarded and does not deteriorate following the operation of the permitted activities.
 - Acceptance of WEEE on site shall be limited to:
 - a) Washing Machines
 - b) Cookers
 - c) Water Meters
 - d) WEEE components derived from end of life vessels and aircraft in accordance with Condition 2.4.1.7

Any other types of WEEE (whole or dismantled components) are strictly prohibited.

- Prior to the acceptance of WEEE components derived from end-of-life vessels and aircraft, the Permit Holder shall submit a method statement to the Authority detailing the proposed treatment and the disposal/recovery route for the output of the treatment or storage. This shall include details on how such activity will follow the conditions of this Permit and describe any appropriate environmental abatement and mitigation measures. Such waste cannot be accepted prior to the Authority's approval in writing of the method statement.
- Lead acid batteries shall only be stored with appropriate containers which shall be resistant to the corrosive action of battery acid and have a snug fitting lid.
- Only end of life vehicles powered by an internal combustion engine shall be accepted on site. The acceptance of end of life electric and hybrid engines is prohibited.
- The dismantling of any aircraft and/or maritime vessel or the acceptance of any parts thereof categorised under waste codes 16 01 04* or 16 01 06 shall be prohibited unless specifically approved by the Authority through the submission and endorsement of a method statement for each and every dismantling operation.
- The Permit Holder shall submit an Energy Efficiency Plan in line with BAT 23 of the Waste Treatment BAT Conclusions under Directive 2010/75/EU as transposed through S.L. 549.77. The plan shall be submitted within the timeframes identified in Improvement Programme Item 17.
- As part of the Annual Environmental Report, the Permit Holder shall produce an Energy Efficiency Audit. The Audit shall compare the site's performance to the key performance indicators set in the Energy Efficiency Plan described in Condition 2.6.1.
- The reservoir shown in **Approved Document IP 0001/13/A/V2/DOC2** shall be built with a capacity of not less than 240m³ of water. The reservoir shall be kept full at all times.∞
- Until such time that the reservoir referred to in Condition 2.7.7 is built, a 5000l water mobile container equipped with a pump dispenser shall be present on site to be used as part of the firefighting equipment.∞
- Metal waste shall be shredded twice prior to further processing in an eddy current sorter.

c) Improvement programme items:

Reference	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∞	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 th 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 th April 2024
6	Notification on the completion of works in accordance with PA 4172/16 to ensure compliance with BAT.	By the 30 th April 2024
7	Submission of monitoring results for the effluent monitoring carried out in line with Approved Doc IP 0001/13/A/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∞	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 th April 2024
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

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/A/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/A/V2/DOC2 is in line with the requirements of Activity 43 of S.L. 549.45	By the 30 th 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 th April 2024

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

Case Officer: Stefan Montebello	Reviewed by: Simon Farrugia
Environment Protection Officer	Senior Officer (Environmental Permitting)
Signature:	Signature:
Date: 21 st October 2022	Date: 21 st October 2022

Endorsed by: Nathalie Ellul
Team Manager (Environmental Permitting)
Signature:
Date: 21 st October 2022