

## Case Officer Report

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**Subject:** IP 00102/22 - Application for the operation of a new installation for the temporary storage and limited processing of hazardous and non-hazardous waste in Hal-Far, submitted by WasteServ Malta Ltd.

**Date:** 30 October 2023

**To:** ERA Board

**From:** Environment and Resources Directorate

**Case Officer:** Isaac Meekers

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### 1. Background

This report has been prepared for the determination of IP 00102/22 for the operation of a new installation for the temporary storage and limited processing of hazardous and non-hazardous waste, submitted by Richard Bilocca o.b.o WasteServ Malta Ltd. In this regard, the application was received on 9<sup>th</sup> December 2021.

### 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 5.1 and 5.5 in Schedule 1 of the Industrial Emissions (IPPC) Regulations (S.L.549.77), to the extent authorised by the Permit, i.e.

“Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging prior to submission to any of the other activities listed in points 5.1 and 5.2.”

And

“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.”

The proposed operations on site include:

- The temporary storage of incoming waste streams including Polystyrene, Gypsum, Tyres, Mattresses, Wood, Flat Glass and various types of Waste electrical and electronic equipment (WEEE)
- Shredding of incoming waste mattresses and wood
- Cutting and baling of waste tyres
- Compaction of Polystyrene
- Degassing of fridges, freezers and air conditioning units. No treatment of any other WEEE shall be carried out on site.

Activity	Description of specified operation	Limits of specified operation
<p>Activity in S.L. 549.77:</p> <p>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</p> <p>Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging prior to submission to any of the other activities listed in points 5.1 and 5.2</p>	<p>Receipt and storage of WEEE and related sorting, management, and repackaging for export of collected WEEE</p> <p>Degassing of fridges, freezers and air conditioning units containing refrigerant gas</p>	<p>From receipt of WEEE according to Schedule 3 to dispatch to authorised facilities either locally or abroad.</p> <p>From the receipt of fridges, freezers and air conditioning units containing refrigerant gas to the exportation or local selling for reuse, recovery or disposal of refrigerant gas.</p>
<p>Storage of non-hazardous wastes (glass, textiles, tyres, wood) in loose format or in other packaging (i.e. jumbo bags or similar)</p>	<p>Receipt and storage of non-hazardous wastes in designated areas.</p>	<p>From receipt of waste to dispatch of loose or packaged waste to authorised facilities for recovery/recycling either locally or abroad.</p>
<p>Storage and processing of wood items, polystyrene, gypsum, tyres and mattresses.</p>	<p>Storage and treatment as per Schedule 3 of wood items, polystyrene, gypsum, tyres and mattresses in designated areas</p>	<p>From receipt of waste until dispatch offsite as waste.</p>

Associated activity of general maintenance and repairs	Maintenance and repair/s on own-equipment and/or vehicles within the installation	From maintenance/repair activity to appropriate recovery/disposal of the waste generated on site.
Associated activity of utilities	Two diesel engine emergency generators each having a rated thermal input of 1.75MW <sub>th</sub> and one diesel engine fire pump.  Treatment of wastewater through a decanter and buffer tank/silt trap.	From receipt of fuel to delivery of utility  From generation of wastewater effluents to disposal as waste

## Proposed Emissions and Mitigation

**Table 1: Emission Points to Air**

Emission Point Reference	Source	Location of emission point
PS1	Shredder	Shredder stack
PS2A	Emergency Generator (Serial No: 20019627)	Generator stack
PS2B	Emergency Generator 2 (Serial No: 20019626)	Generator Stack
PS3	Fire Pump	Engine stack

**Table 2: Emission limits to air and monitoring**

Emission Reference	Point	Parameter	Limit	Minimum Monitoring Frequency
PS1		Dust	5 mg/Nm <sup>3</sup>	Every 6 months
PS2a		NO <sub>x</sub>	190 mg/Nm <sup>3</sup>	Every 3 years
		CO	-	
PS2b		NO <sub>x</sub>	190 mg/Nm <sup>3</sup>	Every 3 years
		CO	-	

## 2.2 Supporting documents recommended for approval

Documents:

- IP 00102/22

Layout plans:

- IP 00102/22/89B, IP 00102/22/92A IP 00102/22/89D, IP 00102/22/89E, IP 00102/22/89F

Fire safety Report:

- IP 00102/22/77G

Degassing operational procedure:

- IP 00102/22/90G

### 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 (S.L.549.63)
- Limitation of Emissions of Certain Pollutants into the Air from Medium Combustion Plants Regulations (S.L.549.122)
- BREF Documents:
  - Best available techniques (BAT) specified in the BREF for waste treatment (published in October 2018)
  - Best available techniques (BAT) specified in the BREF for Emissions from Storage (published in July 2006)

### 2.4 Site Description and Constraints

The site is within the Hal-Far Industrial Estate, adjacent to the existing Civic Amenity Site managed by the same operator.

### 2.5 Site History

The following permitting history is noted on site:

Number	Title	Status
PA 3123/18	Construction of Multi Material Recovery Facility	<i>Granted on 19<sup>th</sup> October 2018</i>
PA 1341/20	The construction of a basement storage facility for non-flammable streams separate from the approved MMRF, with some minor changes to PA3123/18 (MMRF)	<i>Granted on 30<sup>th</sup> March 2021</i>
IP 00102/22	Application for the operation of a new installation for the temporary storage and limited processing of hazardous and non-hazardous waste in Hal-Far, submitted by WasteServ Malta Ltd.	<i>Received 9<sup>th</sup> December 2021</i>

## 2.6 Consultations

### i. Intra-ERA Feedback

There were no comments from an environmental assessment, compliance assessment as well as an air quality perspective. Additionally since there are no discharges to sea from the installation, there were no comments from a biodiversity and water perspective.

Regarding noise from the installation, a noise study carried out as part of development permit application (PA 3123/18) determined that the predicted noise levels from the installation do not exceed more than +3dB over the background noise. In this regard, feedback received confirmed that there is no need for any noise monitoring-related conditions to be included in the IPPC permit, while further noise monitoring studies are also not required.

From a waste management perspective, an update to the list of waste streams and their respective recovery codes was requested, in order to include recycling codes for waste wood as recycling is to be prioritized to contribute to the targets under the Waste Framework Directive and the Packaging and Packaging Waste Directive. The requested revised documents were provided following receipt of the abovementioned feedback, and Wasteserv stated that when possible recycling shall be prioritized.

### ii. Feedback from External Consultees

The **Environmental Health Directorate** as well as the **Occupational Health and Safety Authority** did not have any objection to the application.

The **Regulator for Energy and Water Services (REWS)** stated that an application for the operation of secondary storage of fuel covering all fuel tanks and generators was to be submitted prior to the installation of any equipment on site. The application was submitted to REWS, who are liaising directly with Wasteserv.

The **Water Services Corporation (WSC)** stated that a public sewer discharge permit was required and a set of standard conditions were also provided. In this regard, the operator submitted an application for a public sewer discharge permit. The WSC did not object to the inclusion of the requirement to obtain a sewer discharge permit as an improvement programme item after the commencement of operations on site. In this regard, the obtaining of a sewer discharge permit is being proposed to be included as an improvement programme item (item 2).

The **Civil Protection Department (CPD)** requested the inclusion of a fire report addressing the fire safety and firefighting strategy of the installation. Site familiarization visits were also requested by CPD. The requested fire safety and firefighting strategy reports were submitted and were to the satisfaction of CPD and site familiarization visits were also carried out.

The **Energy and Water Agency**, and the **Planning Authority** did not provide any feedback on the application, while the **Malta Resources Authority** stated that they did not have any comments on the proposal.

## 2.7 Representations from public

- i. **Public consultation dates:** 26<sup>th</sup> May – 24<sup>th</sup> June 2022
- ii. **Responses received:** Medichem Manufacturing Malta noted that they are a neighboring plant.

## 2.8 Discussion

The application relates to new installation for the temporary storage and limited processing of hazardous and non-hazardous waste as detailed in section 2.1.

The application is in line with Best Available Techniques for Waste Treatment Industries (BATC-WTI) and Emissions from Storage (BATC-EFS).

A Regulatory and Public consultation was carried out between 26<sup>th</sup> May and 24<sup>th</sup> June 2022, following which Wasteserv provided clarifications and supplementary documentation as requested by the various bodies as mentioned above.

ERA officers conducted a site visit on the 22<sup>nd</sup> June 2023, following the construction of the new installation. At the time of the site visit, the equipment on site (shredder, polystyrene compactor, baler and tyre cutter) was being tested and parameters were being fine-tuned in order to prepare for a smooth commissioning of the site.

During the site visit, ERA officers verified the operations to be carried out on site, process flows as well as the dedicated locations for the equipment and the waste storage locations against the submitted documentation and layout plans. It was explained that a bar code tracking system for waste handling shall be implemented, whereby each load weighed on the weighbridges would be assigned a unique code. Information such as incoming source, waste type and vehicle number would be registered to that code. Once the waste is repacked following treatment if any, then the jumbo bags would be affixed with bar codes to maintain traceability.

ERA officers also observed the SCADA system in place within the control room. CCTV footage, control of shutter doors, effluent treatment system, and emissions to air are all monitored and actions can be triggered accordingly directly through the SCADA system. Following queries on emission containment system, the applicant indicated that cutting of gypsum shall not be pursued.

The operator explained that although the site is not expected to generate significant waste waters, the site is well equipped with a decanter, buffer-tank, silt trap and underground reservoir so as to be able to treat any effluent discharges from cleaning operations as well as in the event of a fire. Certification for impermeability for the reservoir was submitted accordingly by a third party warranted engineer.

Three combustion plants were observed on site. These included two emergency diesel engine generators, which classify as Medium Combustion Plants under S.L. 549.122 and

one diesel fire pump. In this regard, a method statement and first time monitoring results for emissions to air exhausted by the generators is being proposed to be included as improvement programme items (item 5a & 5b). Following this, monitoring shall be carried out every 3 years. Regarding the fire pump, a good working order certificate is being proposed to be included as an improvement programme item (item 4). No emissions monitoring from the fire pump is required since the equipment does not classify as a medium combustion plant.

ERA officers were informed that degassing operations for limited types of WEEE (fridges, freezers and air conditioning units) was to take place on site. This proposed activity had not been included in the original application. In this regard, as a follow up to the site inspection, the applicant was requested to revise the application to include this proposal and to include details on the degassing procedures to be followed as well as layout plans indicating where such operations shall occur. Degassing shall take place by appropriately trained and licensed personnel using appropriate new vacuum-suction equipment and a pre-operational condition is being included accordingly to ensure that the required documentation is submitted before the commencement of degassing operations. Additionally, it was noted that at the time of inspection, the weighbridges were yet to be calibrated and hence the submission of calibration certificates was pending. The calibration certificates for the weighbridges is therefore being proposed for inclusion as an improvement programme item (item 3).

## 2.10 Financial Matters

<b>Application Fee</b>	<ul style="list-style-type: none"> <li>• €10,000 – IPPC fee – paid</li> <li>• €1,000 for two MCPs - paid</li> </ul> <p><b>Total: €11,000</b></p>
<b>Financial guarantee</b>	€38,000
<b>Annual Fee</b>	€1,000

## 3. Environment Officer Recommendation:

The Regulatory Affairs Directorate recommends the GRANTING of the Permit for a period of ten (10) years subject to the following conditions as post decision requirements:

- Submission of bank guarantee of €38,000

The proposed permit conditions include:

- Standard conditions for this sector;
- Site-specific conditions:
  - Degassing activities shall not take place until such time that the Authority confirms satisfactory receipt of the following:
    - An operational procedure showing how degassing shall take place in line with BAT so as to prevent any fugitive emissions to air.

- Evidence that the refrigerant gas removal capability of the refrigerant recovery unit shall be at least 90 %.
  - The maximum storage capacity of refrigerant cylinders to be stored at one time.
  - The maximum daily treatment capacity for degassing
  - Description of the final fate of the refrigerant cylinders
- Cutting of gypsum is prohibited.
  - Loading and unloading activities shall take place inside the premises and/or indoors and the building fabric, doors and fast roller shutters shall be maintained in a good working condition No treatment or dismantling of WEEE other than repackaging and degassing shall take place on site
  - Waste wood shall be segregated at source according to its hazardous nature prior to its arrival on site.
  - Waste Electric and Electronic equipment containing VHCs or VFCs shall be checked for presence and type of such gas upon site acceptance and managed accordingly
  - A water-misting system shall be deployed during shredding operations.
  - The decanter shall be inspected and certified by an independent warranted engineer at least every four years and shall amongst other things be inspected for efficiency of operation. This certification shall be submitted to the Authority as part of the AER
  - List of waste streams and dedicated storage areas/processing operations that can be handled on site as follows:

Waste Stream	EWC Code	Quantity (maximum site capacity in metric tonnes)	Permitted Processing
Polystyrene (incoming only)	15 01 02	2	Compacting, Packaging and Storage
	07 08 02		
Gypsum (incoming only)	17 08 02	4	Storage
Tyres (incoming only)	16 01 03	30	Cutting, Baling and Storage
Mattresses (incoming only)	20 03 07	20	Shredding, Packaging and Storage
Wood (incoming only)	20 01 38	120	Shredding, Packaging and Storage
	20 01 37*		
	15 01 03		
	17 02 01		
	17 02 04*		
	03 01 05		
Flat Glass	10 11 12	950	Packaging and Storage
	20 01 02		
	19 12 05		
Equipment containing CFC, HCFC, HFC	16 02 11*	1000	Degassing of fridges, freezers and air-conditioning units. Packaging and storage of all WEEE.
Discarded equipment containing hazardous components	16 02 13*		



Discarded equipment	16 02 14		
Hazardous components removed from discarded equipment	16 02 15*		
Components removed from discarded equipment	16 02 16		
Fluorescent tubes and mercury containing waste	20 01 21*		
Discarded Equipment containing CFC	20 01 23*		
Discarded Equipment from CAS	20 01 35*		
Discarded electrical and electronic equipment (light bulbs)	20 01 36		
TV Screens (individual, following dismantling at third party)	19 12 11*	40	
Mattress Foam	19 10 06	900	Storage of all outgoing waste streams
Textiles	20 01 11	130	
Polystyrene (Compacted & Baled)	19 12 04	105	
Springs/Metal	19 12 02	5	
	19 12 03		
Tyres (Baled or Cut & Baled)	16 01 03	240	
Wood (Shredded)	19 12 07	340	
Other Wood (Shredded)	19 12 06*	1360	
Gypsum (Outgoing only)	17 08 02	200	
Surface water runoff	Subject to characterisation as per IP item 8	500m <sup>3</sup>	
Silt and Dirt	20 03 99	0.2	
Degassing cylinders	14 06 01*	0.15	

- Improvement programme items:

Reference	Requirement	Deadline
1	To provide an updated EMS in line with BAT No. 1 of BAT-WTI for approval by the Authority	Within 6 months of the granting of this permit
2∞	To obtain a sewer discharge permit from the WSC	Within 3 month of the granting of this permit

3	Calibration of the weighing equipment and submission of the calibration certificate signed by a third party warranted engineer or by the equipment's manufacturing company, as per Condition 3.1.10	Within 1 month of the granting of this permit
4	Submission of a good working order certificate from a third party warranted engineer for the fire pump (PS3) referred to in Table 2.2.1	Within 3 months of the granting of the permit
5.	Submission of a method statement by a third party expert service provider showing how the monitoring requirements for air emissions permitted in Table 2.2.2 will be sampled and tested in accordance with Section 2.2.	Within 2 months of the granting of the permit
	First measurement for the air monitoring as approved by 5(a) above.	Within 4 months of the granting of the permit
6∞	Obtain REWS authorisation for all diesel storage tanks on site	Within 2 months of the granting of the permit
7	Characterisation of surface water run-off (referred to in Schedule 3) generated from all waste storage and treatment areas for the appropriate classification according to The Waste Regulations S.L. 549.63	Within 6 months of the granting of the permit

<b>This report to the ERA Board has been prepared, reviewed and endorsed by:</b>	
<b>Case Officer: Isaac Meekers</b>	<b>Reviewed and endorsed by: Simon Farrugia</b>
Env. Protection Officer	Senior Env. Protection Officer
Signature:	Signature:
Date: 30 <sup>th</sup> October 2023	Date: 30 <sup>th</sup> October 2023