

IP 0005/13/B/V1

Sant Antnin Waste Treatment Plant

Variation & Partial Surrender of IPPC Permit IP 0005/13/B

Environmental Permitting Unit
Environment and Resource Authority

Site Location



Triq Sant Antnin Marsascala

Currently Permitted Operations

- ▶ Operation of an Anaerobic Digestion (AD) Plant
 - ▶ Biological treatment of organic waste
- ▶ Operation of a Material Recovery Facility (MRF)
 - ▶ Manual sorting of non-hazardous waste
- ▶ Storage of glass

Applicable Legislation

- ▶ Waste Regulations (S.L. 549.63)
- ▶ 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)(i):
 - ▶ “Recovery of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment”
- ▶ Commission Implementing Decision (2018/1147) establishing the BAT conclusions for Waste Treatment Industries

Environmental Monitoring Committee

- ▶ Monitoring Committee established under the current permit
- ▶ Composed of members from ERA, WasteServ, Marsaskala Local Council and consultant
- ▶ Meetings held regularly every 2 months to discuss ongoing operations, complaints and permit requirements.

Application Process

Detail	Date	Comment
Granting of IP 0005/13/B	Granted on 13 January 2021	Expires on 13 January 2025
Submission of Variation Application IP 0005/13/B/V1	Received on 8 November 2021	/
Public Consultation	Commenced on 29 January 2022	Concluded on 12 February 2022
Regulatory and Internal Consultation	Request dated 31 January 2022	Requested feedback by 14 February 2022
Consultation with Permit Holder	Request dated 6 November 2023	Response detailed later in presentation
Submission of consolidated application	Received on 17 November 2023	/

Proposed Changes

- ▶ Variation includes the below:
 - ▶ Introduction of ferrous sorting line
 - ▶ Introduction of glass sorting line
 - ▶ Inclusion of new waste streams - mattresses, gypsum, textiles & flat glass - storage only
- ▶ Partial surrender to the IPPC to remove the decommissioned AD plant and ancillary equipment from the on-site operations

Proposed Changes

- ▶ Application number IP 0005/13/B/V1 covers surrender of IPPC permit in view of the completed decommissioning of the equipment and operations within scope of S.L. 549.77
- ▶ Remaining operations on site no longer require an IPPC permit
- ▶ The Directorate is proposing that the remaining operations are covered by an environmental permit - EP 0016/23

Internal Consultation

- ▶ Query related to when AD plant stopped operating - December 2019
- ▶ Provided status update on the improvement programme items
- ▶ Number of issues related to reporting where highlighted
 - ▶ Pending submissions going back to 2021
 - ▶ Currently being followed up through the compliance process

Internal Consultation

- ▶ Two complaints were received on site
 - ▶ One was unfounded - related to micro plastics in adjacent Family Park
 - ▶ One was related to noise at night - Permit Holder agreed to take any necessary measures to reduce potential noise impacts from the plant
- ▶ Number of comments related to the noise monitoring study carried out in 2022 - included as Improvement programme item

Regulatory Consultation

- ▶ **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

- ▶ No objection

- ▶ **Occupational Health and Safety Authority (OHSA), Water Services Corporation (WSC)**

- ▶ No objection

Regulatory Consultation

- ▶ **Environmental Health Directorate (EHD)**
 - ▶ Suggested conditions on water runoff, litter, pest control, unpredicted impacts and complaints
- ▶ **Civil Protection Department (CPD) & Malta Resources Authority (MRA)**
 - ▶ No comments
- ▶ **Energy and Water Agency (EWA), Planning Authority (PA) & Transport Malta (TM)**
 - ▶ No feedback was provided

Public Consultation

- ▶ Public Consultation dates:
 - ▶ 29 January 2022 - 12 February 2022
- ▶ No representations were received

Site Visit

- ▶ Site visit was conducted on the 3rd March 2023
- ▶ Observed normal operations on site



Site Visit



Bales of plastic & cardboard, textiles, flat glass, mattresses & wood

Site Visit



Glass sorting line, gas bubble, digester tanks

Proposed Changes to Conditions

- ▶ Removed conditions that are enforceable by regulatory consultees in view of surrender of IPPC permit. (Consultees have already been informed)
- ▶ Removal of conditions related to the AD plant
- ▶ Removal of emission points related to the AD plant
- ▶ Updating of conditions related to the MCP in line with the latest standard conditions

Proposed Changes to Conditions

- ▶ Conditions related to noise and dust emissions from the sorting lines
 - ▶ Dampening with water during metal sorting activities
 - ▶ Reducing drop height when handling waste glass and metal
 - ▶ Enclosure of conveyor belts used for the waste transfer
 - ▶ Storage of all stockpiles and bales of waste in line with the fire prevention measures in line with Approved Document EP 0016/23/DOC3

Proposed Changes to Conditions

- ▶ Conditions related to storage of MSW (black bag)
 - ▶ Removal of such waste on site shall be kept to a minimum duration and not exceeding 3 days
- ▶ Conditions related to site closure as per requirements of S.L. 549.77
- ▶ Addition of EWC Codes in Schedule 3 covering the new waste streams previously mentioned.

Proposed Updated Improvement Programme

Ref	Requirement	Deadline
21	Submission of a decommissioning report in accordance with Approved Document EP 0016/23/DOC3 for the 9,000 litre heavy gasoil tank and the diesel tank with its dispensing equipment.	Within 1 month of permit
27	Submission of an updated noise monitoring report for 2022 in line with the Authority's communication on the 27th September 2023	Within 2 months of permit
28	a) Submission of a method statement in line with latest published ERA methodology document showing how the monitoring requirements for PS6 shall be carried out	Within 2 months of permit
	b) First measurement for the air monitoring as approved by 28(a) above	Within 4 months of permit

Proposed Updated Improvement Programme

Ref	Requirement	Deadline
29	Submission of a decommissioning report in line with Approved Document EP 0016/23/DOC4 for the Authority's approval for the works carried out to remove the anaerobic digestion plant and ancillary activities including all receipts and relevant consignment notes for the equipment and materials removed from site.	Within 1 month of completion of decommissioning of the AD plant and ancillary equipment
30	Submission of an updated report in for the land and groundwater investigations carried out on site	Within 3 months of permit

Feedback from Applicant

- ▶ Consultation with the operator regarding the proposed permit conditions was carried out on 9 November 2023.
- ▶ Clarifications on the storage of MSW were provided during a meeting, as well as confirmation of timeframes by when the decommissioning report and an updated land and groundwater report will be available

Feedback from Monitoring Committee

- ▶ Consultation with the monitoring committee regarding the proposed permit conditions was carried out on 17 November 2023.
- ▶ Local council representative had no objection on the proposed conditions.

Updates since submission of COR to ERA board

- ▶ There were no updates to COR

Permit Fees and Bank Guarantee

- ▶ Application Fee
 - ▶ €3,500 for a variation and partial surrender application - **Paid**
- ▶ Bank Guarantee
 - ▶ €30,000 (as compared to the current bank guarantee of €1,072,300)
 - ▶ Covered by Letter of Undertaking for Government Projects
- ▶ MCP Fee
 - ▶ €250 for a Surrender - **Paid**

Directorate Recommendation

- ▶ The surrender of IP 0005/13/B as the outcome of IP 0005/13/B/V1
- ▶ The granting of EP 0016/23 retaining the original expiry date of IP 0005/13/B (i.e. 13th January 2025)

Subject to:

A bank guarantee of €30,000 (already confirmed to be covered by the Letter of Undertaking for Government Projects)