



IP 0001 / 22
Green Skip Services Ltd.
Renewal & Variation

Environmental Permitting Unit
Environment and Resources Authority

Site location



Site located in Maghtab, l/o Naxxar



Application Process

- ▶ Current permit validity - 02 January 2025
- ▶ Application for renewal - 03rd January 2022
- ▶ Request for Information - 03rd February 2022
- ▶ Validation - 23rd November 2022
- ▶ Public, Statutory & Internal Consultations - 18 March - 01 April '23
- ▶ Reviews - May 2023 - March 2024
- ▶ Site Visit - 14 October 2024
- ▶ Final submissions - November 2024

Applicable Regulations

- ▶ Environment Protection Act (CAP. 549)
- ▶ Industrial Emissions (Framework) Regulations (S.L. 549.76)
- ▶ Integrated Pollution Prevention and Control Regulation (S.L. 549.77)
- ▶ Best Available Techniques (BAT) specified in the Waste Treatment Industries

Permitted Operations (1)

- ▶ From Schedule 1 of S.L. 549.77:
- ▶ 5.1 Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving:
 - ▶ c. blending or mixing prior to submission to any of the other activities listed in points 5.1 and 5.2
 - ▶ d. repackaging prior to submission to any of the other activities listed in points 5.1 and 5.2
- ▶ 5.5 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.

Permitted Operations (2)

- ▶ Non/Hazardous waste collection & storage
 - ▶ Various inert wastes & metals
- ▶ Storage & dismantling of WEEE
- ▶ Associated activity of generation of waste
- ▶ Associated general maintenance and repair
- ▶ Associated use of stand-be generator

Requested Variations (1)

- ▶ Removal of IP item 5 (generator rating)
 - ▶ Provided through application review. **Removed**
- ▶ Removal of IP item 7 (bundling of storage sheds)
 - ▶ Secondary containment of high importance. **Retained**
- ▶ Removal of IP item 8 (waste-type sampling procedure)
 - ▶ Clarified that already in place. **Removed**
- ▶ Removal of IP item 9 (Noise monitoring MS)
 - ▶ Provided during permit validity. **Removed**

Requested Variations (2)

- ▶ Removal of IP item 10 (EoW requirements)
 - ▶ Requirements persist regardless of status of activity. **Retained**
- ▶ Removal of IP item 11 (air monitoring)
 - ▶ Legal requirement from BAT obligations. **Retained**
- ▶ Removal of IP item 13 (recertification of site permeability)
 - ▶ Certificate recommends retesting with time and amendments made to site drainage. **Retained**
- ▶ Removal of IP item 14 (Outline decommissioning plan)
 - ▶ Had been provided. **Removed**

Requested Variations (3)

- ▶ Extension of permit validity to 10 years
 - ▶ Such validity is now in line with current ERA practice.
 - ▶ **Proposed for acceptance**
- ▶ Amendment to waste auditing requirements
 - ▶ Currently under discussion within ERA and pending final decision
 - ▶ Once finalised, ERA to implement required changes.
- ▶ Relocation of certain waste storage
 - ▶ Accepted excluding outdoor storage of WEEE.
 - ▶ **Partially included**

Site Visit - 14th October 2024

- ▶ Clarifications made on site drainage
- ▶ Clarifications made on waste tracking system



General Conditions

- ▶ Operating conditions
- ▶ Emissions
- ▶ Odour
- ▶ Noise & Vibration
- ▶ Waste Acceptance
- ▶ Storage & Handling
- ▶ Recovery & Disposal
- ▶ Training
- ▶ Maintenance
- ▶ Incidents & Complaints
- ▶ Records
- ▶ Reporting & Notifications
- ▶ Closure & Decommissioning

Site-specific Conditions

- ▶ Emissions from shredding to be minimised by the application of at least one of the below:
 - ▶ Cyclone
 - ▶ Fabric filter
 - ▶ Wet scrubbing
 - ▶ Water injection
- ▶ No emission to land, except for the overflow from the underground reservoir beneath the sorting shed in Approved Document IP0001/22/DOC2.
- ▶ The total amount of WEEE that can be stored at any given time shall not exceed that amount which can be treated within twelve (12) months.
- ▶ Secondary BG tied to pending submissions

Improvement Programme (1)

Reference	Requirement	Date	Status
1	Physical delineation and signage of all waste storage areas and quarantine area as per site layout plan submitted as part of the Document 8 of the IPPC application. Within 1 month from the date of issue of the permit	Within 1 month from the date of issue of the permit	Closed
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 from the date of issue of the permit	Retained
3	Submission of a land and groundwater baseline report in line with the Method Statement dated September 2017 approved by ERA and pursuant to Regulations 9(3) and 16(2) of the Industrial Emissions (IPPC) Regulations, and condition 2.9.4.	May 2018	Closed
	Submission of an update to baseline report which includes additional testing to be carried out in the dry season	September 2018	

Improvement Programme (2)

Reference	Requirement	Date	Status
4	Certification by an independent warranted civil engineer or engineer that the fuel retention separator has been constructed in accordance with EN 858 , including inspection of the efficiency of operation and site layout plan.	Within 2 months of issue of the permit.	Retained
5	To provide the rated thermal input in megawatts thermal (MW), average load in use and annual operating hours of the diesel generator.	Within 2 months of issue of the permit.	Closed
6	Certification from a third party warranted engineer or architect showing that the bund for the generator's built-in fuel tank is constructed according to condition 2.2.6.8 below	Within 3 months of issue of the permit.	Retained
7	Installation of collapsible bundling strips within the waste storage sheds to prevent any run-off within the sheds from reaching the gutter just outside the sheds	Within 3 months of issue of the permit	Retained

Improvement Programme (3)

Reference	Requirement	Date	Status
8	Submission and implementation of a procedure for waste-type specific sampling for all different incoming waste delivered in bulk and/or containers in line with the requirements of BAT conclusions as per condition 2.4.1.12.	Submission of procedure within 3 months of issue of the permit. Implementation within 1 month of approval of procedure by the Authority	Closed
9	Submission of a method statement for carrying out a Noise Monitoring Survey in accordance with condition 2.2.9.4.	Within 4 months from the issue of the permit.	Closed
10	Submission of analysis to achieve End of Waste (EoW) criteria further to Schedule 10 of Subsidiary Legislation 549.63 to the competent authority for cardboard/paper to be used as animal bedding and/or absorbent material to enable the authority to consider inclusion of relevant criteria to be met in the permit.	Within 4 months of issue of the permit	Closed

Improvement Programme (4)

Reference	Requirement	Date	Status
11	<p>A) Submission of a method statement for monitoring of total particulate matter (TPM) and Total Volatile Organic Compounds (TVOC) in accordance with condition 2.2.1.6.</p> <p>B) Submission of total particulate matter (TPM) and Total Volatile Organic Compounds (TVOC) monitoring in accordance with the approved method statement as per item 11 A) above</p>	<p>Within 6 months from the issue of the permit.</p> <p>Within 3 months from approval of the method statement</p>	Retained (without VOC monitoring)
12	Submission of details and photographic evidence of the installed weighbridge, together with its calibration details.	Within 6 months from the issue of the permit	Closed
13	Recertification by a third party warranted engineer or architect of site impermeability including cesspits and spill reservoirs considering the activities taking place within the yard.	Within 18 months of issue of the permit.	Retained

Improvement Programme (5)

Reference	Requirement	Date	Status
14	Submission of an Outline Decommissioning Plan	Within 3 years of issue of the permit.	Closed
15	Submission of generator certification in line with Condition 2.2.7 (good working order)	Within 3 months of issue of this permit.	Retained
16	Implementation of at least one of the abatement techniques listed in Condition 2.2.6.	Within 6 months of issue of this permit.	NEW

Consultations

- ▶ Public, Statutory and Internal Consultations
- ▶ 18th March - 01 April 2023
- ▶ No submissions made by the public

Regulatory Consultations

Consultee	Comments
REWS	Requested clarifications on fuel tanks & generator on site. →Applicant provided
EHD	Provided conditions on pest control, rain & second class water, impact on the general public. → Included in permit
CPD	Provided fire safety requirements for the site. Measures were for site features and fire-fighter safety. → Certification of fire safety features added in permit.
WSC	Requested stricter control on industrial effluent collected cesspit which discharges sewer. Applicant indicated that interceptor added as effluent treatment prior to the cesspit. → Certification of interceptor included in permit
OHSA	Provided conditions on worker safety onsite. → Included in permit

Intra-ERA feedback

- ▶ Confirmed requirements for air (dust) monitoring (requested variations)
- ▶ Confirmed End-of-Waste requirements for animal bedding (requested variations)
- ▶ Clarifications were provided with regards to packaging and export.
- ▶ Provided updates & confirmed importance of the improvement programme items
- ▶ Made reference to Stop and Compliance Order (OWK0035/19) regarding the duration and location of asbestos storage onsite.
 - ▶ Payment due: €18,350
 - ▶ Currently under appeal (PAB/00253/19)

Feedback from Applicant

- ▶ Objected to air monitoring and abatement requirements.
 - ▶ ERA informed requirements still hold
- ▶ Queries about handling and acceptance of EWC codes
 - ▶ ERA provided clarifications but did not allow introduction of new codes at this stage.
- ▶ Queries about waste-receipt sample auditing
 - ▶ ERA indicated requirements are still under revision
- ▶ Queries on EoW and Noise monitoring requirements
 - ▶ Clarified by the ERA

Financial Matters

- ▶ Application fee - €18,000 - Paid
 - ▶ 50% of application fee for renewal - €15,000
 - ▶ 10% of application fee for variation - €3,000
- ▶ Financial guarantee - €25,000 (currently amounts to €46,500)
- ▶ Annual fee - €6,000 - Paid
 - ▶ 10% of application fee
 - ▶ €3,000 for each year of 2024 & 2025
- ▶ Inspection fees €400 - Paid
- ▶ Fines - €18,350 (OWK0035/19) - Pending

Pending Submissions

- ▶ Applicant indicated what submissions can be finalised within current permit validity

Aspect	Inclusion
Fire safety certification (est. June 2025)	Permit
Interceptor certification inline with EN 858	Permit
Generator bunding certification (est. March 2025)	Permit
Bunding for waste storage sheds	PDR
Air monitoring method statement	PDR
Recertification of site impermeability	PDR

Bank Guarantees

- ▶ Currently facility has 2 bank guarantees in place
 - ▶ €25,500 on permit conditions
 - ▶ €21,225 on previous IP items
- ▶ BG on permit conditions to be retained
- ▶ BG on previous IP items revised to cover pending submissions
 - ▶ €11,500
 - ▶ Certification of fire safety features - €10,000
 - ▶ Certification of interceptor - €1,000
 - ▶ Certification of generator bunding - €500

Recommendation

The Regulatory Affairs Directorate is recommending the:

GRANTING

of IP 0001/22, for a period of 10 years, subject to the following conditions:

- ▶ Submission of a Bank Guarantee of €36,500
- ▶ Payment of €18,350 regarding OWK 0035/19
- ▶ Installation of bunding for waste storage sheds
- ▶ Submission of Method Statement for air (dust) monitoring
- ▶ Recertification of site impermeability & drainage features