

Contract No. EP/SP/61/10 Organic Resources Recovery Centre (Phase 1)

Thirty-fifth Quarterly EM&A Summary Report

PREPARED FOR
OSCAR Bioenergy Joint Venture

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Meinhardt Infrastructure and Environment Limited

Organic Resources Recovery Centre, Phase I

35th Quarterly EM&A Report (1 Dec 2023 – 29 Feb 2024)

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Contract No. EP/SP/61/10 Organic Resources Recovery Centre (Phase 1)

Thirty-fifth Quarterly EM&A Summary Report 0279222

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EXECUTIVE SUMMARY

The construction works of **No. EP/SP/61/10 Organic Resources Recovery Centre Phase 1 (the Project)** commenced on 21 May 2015. This is the 35th Quarterly Environmental Monitoring and Audit (EM&A) report presenting the EM&A works carried out during the period from 1 December 2023 to 29 February 2024 in accordance with the EM&A Manual. Substantial completion of the construction works was confirmed on 3 December 2018. In the meantime, the operation phase EM&A programme had commenced in March 2019. Substantial Completion in respect of substantial part of the Works was confirmed on 24 February 2020. The construction phase EM&A programme was completed in the end of February 2020.

SUMMARY OF WORKS UNDERTAKEN DURING THE REPORTING PERIOD

Works undertaken in the reporting period included:

- Operation of the Project, including organic waste reception, and operation of the pretreatment facilities, anaerobic digesters, composting facilities, air pollution control systems, on-line emission monitoring system for the Centralised Air Pollution Control Unit (CAPCS), Co-generation Units (CHP)s and Ammonia Stripping Plant (ASP), and the wastewater treatment plant;
- CHP3 overhaul;
- ASP hot water pump repair works;
- Completed changing of tubing on all AD mixers (commenced November 2023);
- CAPCS venturi scrubber and fan overhaul;
- Venturi scrubber fan No. 2 overhaul completed;
- Bay 3 RCV front door new gearbox installed and completed;
- · Mixer and conveyor in composting bay repaired;
- Polymer dosing mixers replaced;
- Road sweeper brushes and spray nozzles repaired;
- Suspension Buffer Tank (SBT) cleaning;
- Venturi scrubber fan No. 1 cleaned and all operational parameters checked;
- Venturi scrubber fan No. 2 cleaned and all operational parameters checked;
- Wet scrubber No. 1 cleaned and all operation parameters checked;
- Wet scrubber No. 2 opened and began cleaning before operation parameters can be checked;
- ASP balancing valve replaced and a number of DN150 valves including cleaning of plate type and shell and tube type heat exchangers; and
- Checking on AD3 pressure relief valve.



ENVIRONMENTAL MONITORING AND AUDIT PROGRESS

AIR QUALITY MONITORING

Non-compliance of emission limits of NO_x , SO_2 , and HCl from CHP1; NO_x and SO_2 from CHP2; and NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during December 2023. The exceedances of NO_x , SO_2 , and HCl from the CHPs, as well as the exceedances of NO_x , SO_2 , NH_3 , and HCl from the ASP, occurred due to system instability.

Non-compliance of emission limits of Odour from CAPCS; NO_x , SO_2 , and HCl from CHP1; NO_x and SO_2 from CHP2; NO_x and SO_2 from CHP3; and NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during January 2024. The exceedances of Odour from CAPCS; NO_x , SO_2 , and HCl from the CHPs; as well as the exceedances of NO_x , SO_2 , NH_3 , and HCl from the ASP, occurred due to system instability.

Non-compliance of emission limits of Odour from CAPCS; NO_x , SO_2 , and HCl from CHP1; NO_x and SO_2 from CHP2; NO_x and SO_2 from CHP3; and NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during February 2024. The exceedances of Odour from CAPCS; NO_x , SO_2 , and HCl from the CHPs; as well as the exceedances of NO_x , SO_2 , NH_3 , and HCl from the ASP, occurred due to system instability.

WATER QUALITY

All analytes from the outlet chamber of the effluent storage tank were recorded to be in compliance with discharge limits during the reporting period.

All analytes from Petrol Interceptors 1 and 2 were recorded to be in compliance with discharge limits of during the sampling conducted in both December 2023 and February 2024.

WASTE MANAGEMENT

Waste generated from the operation of the Project includes chemical waste, waste generated from pre-treatment process and general refuse.

During the reporting period, 1,200L of chemical waste (spent lube oil) in January 2024 and a further 400L of chemical waste (spent lube oil) in February 2024 were disposed of at CWTC during the reporting period.

2,737.68 tonnes of waste generated from pre-treatment process from the operation of the Project was disposed of at landfill. Among the recyclable waste generated from pre-treatment process from the operation of the Project, 0.000 tonnes of metals, 0.000 tonnes of papers/cardboard packing, and 0.000 tonnes of plastics were sent to recyclers for recycling during the reporting period.

Around 8.294 tonnes of general refuse from the operation of the Project were disposed of at landfill. Among the recycled general refuse from the operation of the Project, 0.012 tonnes of metals, 0.199 tonnes of papers/cardboard packing and 0.036 tonnes of plastics were sent to recyclers for recycling during the reporting period.

FINDINGS OF ENVIRONMENTAL SITE AUDIT

A summary of the monitoring activities undertaken in this reporting period is listed below:

• Joint Environmental Site Inspections 3 times



Landscape & Visual Inspections

3 times

Monthly joint environmental site inspections were carried out. The environmental control/mitigation measures (related to air quality, water quality, waste (including land contamination prevention), hazard-to-life, and landscape and visual) recommended in the approved EIA Report and the EM&A Manual were properly implemented by the Contractor during the reporting period.

ENVIRONMENTAL EXCEEDANCE/NON-CONFORMANCE/COMPLIANT/SUMMONS AND PROSECUTION

Exceedances for the air emission limits for the CAPCS, CHP, and ASP stacks were recorded during the reporting period.

Five (5) Environmental Complaints regarding odour nuisance were received at the facility on 19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024. Mitigation measures were implemented, daily odour patrols were arranged, and interim reports regarding the complaints were submitted to EPD on 3 March 2024 and 8 March 2024. The full investigation reports of the Environmental Complaints are presented in *Annex F*.

FUTURE KEY ISSUES

Activities to be undertaken in the next reporting period include:

- Operation of the Project;
- Complete planned maintenance work of Wet scrubber No. 2;
- Focus on centrifuge area and polymer dosing system for the month;
- Focus on sieve fine plastic;
- Install new pipeline at leachate tank;
- Clean PST;
- Install drum screen for IPS;
- SBT Cleaning; and
- Checking on AD3 pressure relief valve.



1. INTRODUCTION

ERM-Hong Kong, Limited (ERM) was appointed by OSCAR Bioenergy Joint Venture (the Contractor) as the Environmental Team (ET) to undertake the construction Environmental Monitoring and Audit (EM&A) programme for the *Contract No. EP/SP/61/10 of Organic Waste Treatment Facilities Phase I*, which the project name has been updated to *Organic Resources Recovery Centre (Phase I) (the Project)* since November 2017. ERM was also appointed by the Contractor to undertake the operation EM&A programme starting 1 March 2019.

1.1 PURPOSE OF THE REPORT

This is the 35th Quarterly EM&A report which summarises the monitoring results and audit findings for the EM&A programme during the reporting period from **1 December 2023** to **29 February 2024**.

1.2 STRUCTURE OF THE REPORT

The structure of the report is as follows:

Section 1: Introduction

It details the scope and structure of the report.

Section 2: Project Information

It summarises the background and scope of the Project, site description, project organisation and status of the Environmental Permits (EP)/licences.

Section 3: Environmental Monitoring and Audit Requirements

It summarises the environmental monitoring requirements including monitoring parameters, programmes, methodologies, frequency, locations, Action and Limit Levels, Event/Action Plans, as well as environmental audit requirements as recommended in the EM&A Manual and approved EIA report.

Section 4: Monitoring Results

It summarises monitoring results of the reporting period.

Section 5: Site Audit

It summarises the audit findings of the environmental as well as landscape and visual site audits undertaken within the reporting period.

Section 6: Environmental Non-conformance

It summarises any exceedance of environmental performance standard, environmental complaints and summons received within the reporting period.

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Section 7: Further Key Issues

It summarises the impact forecast for the next reporting month.

Section 8: Conclusions



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2. PROJECT INFORMATION

2.1 **BACKGROUND**

The Organic Resources Recovery Centre (ORRC) Phase I development (hereinafter referred to as "the Project") is to design, construct and operate a biological treatment facility with a capacity of about 200 tonnes per day and convert source-separated organic waste from commercial and industrial sectors (mostly food waste) into compost and biogas through proven biological treatment technologies. The location of the Project site is shown in Annex A.

The environmental acceptability of the construction and operation of the Project had been confirmed by findings of the associated Environmental Impact Assessment (EIA) Study completed in 2009. The Director of Environmental Protection (DEP) approved this EIA Report under the Environmental Impact Assessment Ordinance (EIAO) (Cap. 499) in February 2010 (Register No.: AEIAR-149/2010) (hereafter referred to as the approved EIA Report). Subsequent Report on Re-assessment on Environmental Implications and Report on Reassessment on Hazard to Life Implications were completed in 2013, respectively.

An Environmental Permit (EP) (No. EP-395/2010) was issued by the DEP to the EPD (Project Team), the Permit Holder, on 21 June 2010 and varied on 18 March 2013 (No. EP-395/2010/A) and 21 May 2013 (No. EP-395/2010/B), respectively. The Design Build and Operate Contract for the ORRC Phase 1 (Contract No. EP/SP/61/10 Organic Resources Recovery Centre (Phase 1) (the Contract)) was awarded to SITA Waste Services Limited, ATAL Engineering Limited and Ros-Roca, Sociedad Anonima jointly trading as the OSCAR Bioenergy Joint Venture (OSCAR or the Contractor). A Further EP (No. FEP-01/395/2010/B) was issued by the DEP to the OSCAR on 16 February 2015. Variation to both EPs (Nos. EP-395/2010/B and FEP-01/395/2010/B) were made in December 2015. The latest EPs, Nos. EP-395/2010/C and FEP-01/395/2010/C, were issued by the DEP on 21 December 2015.

Under the requirements of Condition 5 of the EP (No. FEP-01/395/2010/C), an Environmental Monitoring and Audit (EM&A) programme as set out in the approved EM&A Manual (hereinafter referred to as EM&A Manual) is required to be implemented during the construction and operation of the Project. ERM-Hong Kong, Ltd (ERM) has been appointed by OSCAR as the Environmental Team (ET) for the construction phase EM&A programme and the Monitoring Team (MT) for the operation phase EM&A programme for the implementation of the EM&A programme in accordance with the requirements of the EP and the approved EM&A Manual.

The construction works commenced on 21 May 2015. The operation phase of the EM&A programme commenced on 1 March 2019 (1). The construction phase EM&A programme was completed in the end of February 2020.

2.2 GENERAL SITE DESCRIPTION

The Project Site is located at Siu Ho Wan in North Lantau with an area of about 2 hectares. The layout of the Project Site is illustrated in Annex A. The facility received an average of 157.17 to 170.58 tonnes and treated an average of 126.09 to 142.80 tonnes of source separated organic waste per day during the reporting period.

⁽¹⁾ As some of the minor items are yet to be closed out in March 2019, the construction phase EM&A programme and Operation Phase EM&A programme were undertaking in parallel in March 2019.



2.3 MAJOR ACTIVITIES UNDERTAKEN

A summary of the major activities undertaken in the reporting period is shown in Table 2.1.

TABLE 2.1 SUMMARY OF ACTIVITIES UNDERTAKEN IN THE REPORTING PERIOD

Activities Undertaken in the Reporting Period

- Systems being operated waste reception, pre-treatment, CAPCS extraction, the digesters, the
 centrifuge, the composting tunnels, the desulphurisation, the emergency flare, the CHPs, the ASP
 and the biological wastewater treatment plant (about 157.17 170.58 t/d SSOW input);
- CHP3 overhaul;
- ASP hot water pump repair works;
- Completed changing of tubing on all AD mixers (commenced November 2023);
- CAPCS venturi scrubber and fan overhaul;
- Venturi scrubber fan No. 2 overhaul completed;
- Bay 3 RCV front door new gearbox installed and completed;
- · Mixer and conveyor in composting bay repaired;
- Polymer dosing mixers replaced;
- Road sweeper brushes and spray nozzles repaired;
- Suspension Buffer Tank (SBT) cleaning;
- Venturi scrubber fan No. 1 cleaned and all operational parameters checked;
- Venturi scrubber fan No. 2 cleaned and all operational parameters checked;
- Wet scrubber No. 1 cleaned and all operation parameters checked;
- Wet scrubber No. 2 opened and began cleaning before operation parameters can be checked;
- ASP balancing valve replaced and a number of DN150 valves including cleaning of plate type and shell and tube type heat exchangers; and
- Checking on AD3 pressure relief valve.

2.4 PROJECT ORGANISATION AND MANAGEMENT STRUCTURE

The project organisation chart and contact details are shown in *Annex B*.

2.5 STATUS OF ENVIRONMENTAL APPROVAL DOCUMENTS

A summary of the valid permits, licences, and/or notifications on environmental protection for this Project is presented in *Table 2.2*.

TABLE 2.2 SUMMARY OF ENVIRONMENTAL LICENSING, NOTIFICATION AND PERMIT STATUS

Permit/ Licences/ Notification	Reference	Validity Period	Remarks
Environmental Permit	FEP- 01/395/2010/C	Throughout the Contract	Permit granted on 21 December 2015
Effluent Discharge License	WT00038391- 2021	7 July 2021 – 30 June 2026	Approved on 7 July 2021
Chemical Waste Producer Registration	WPN 5213- 961-O2231-02	Throughout the implementation of the Project	Approved on 10 November 2017



Permit/ Licences/ Notification	Reference	Validity Period	Remarks
Waste Disposal Billing Account	Account number: 702310	Throughout the Contract	-

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3. ENVIRONMENTAL MONITORING AND AUDIT REQUIREMENTS

3.1 ENVIRONMENTAL MONITORING

The air quality (including odour) monitoring to be carried out during the operation phase of the Project are described below. Although water quality monitoring is not required for the operation phase under the EM&A programme, there are water quality monitoring requirement under the Water Discharge Licence of the plant under the Water Pollution Control Ordinance (WPCO). As part of this EM&A programme, the monitoring results will be reviewed to check the compliance with the WPCO requirements.

3.1.1 AIR QUALITY

According to the EM&A Manual and EP requirements, stack monitoring is required during the operation phase of the Project.

On-line monitoring (using continuous environmental monitoring system (CEMS) shall be carried out for the centralised air pollution unit (CAPCS), cogeneration units (CHP) and the ammonia stripping plant (ASP) during the operation phase. The most recent sensor calibrations for the CAPCS system was carried out on 15 January 2024 for VOCs and 19 January 2024 for H_2S . The most recent span calibrations for the CHPs CEMS systems were carried out from 26 to 28 September 2023. The most recent span calibrations for the ASP was carried out on 27 February 2024. Annual CAPCS CEMS calibration was carried out from 10 to 12 October 2023.

The monitoring data is transmitted instantaneously to EPD (Regional Office) by telemetry system.

When the on-line monitoring for certain parameter cannot be undertaken, monitoring will be carried out using the following methodology approved by the EPD

TABLE 3.1 SAMPLING AND LABORATORY ANALYSIS METHODOLOGY

Parameters	Method	Stacks to be Monitored
Gaseous and vaporous organic substances (including methane)	USEPA Method 18	CAPCSCHPASP
Particulate	USEPA Method 5	CAPCSCHPASP
Carbon monoxide (CO)	USEPA Method 10	CHP ASP
Nitrogen oxides (NO _x)	USEPA Method 7E	CHP ASP
Sulphur dioxide (SO ₂);	USEPA Method 6	CHP ASP
Hydrogen chloride (HCI)	USEPA Method 26A	CHP ASP
Hydrogen fluoride (HF)	USEPA Method 26A	CHP ASP
Oxygen (O ₂);	USEPA Method 3A	CAPCSCHPASP



Parameters	Method	Stacks to be Monitored
Velocity and Volumetric Flow	USEPA Method 2	CAPCS
		CHP
		• ASP
Ammonia (NH ₃)	USEPA CTM 027	ASP
Odour (including NH ₃ and H ₂ S)	EN 13725	CAPCS
Water vapour content (continuous	USEPA Method 4	CAPCS
measurement of the water vapour		CHP
content should not be required if the		ASP
sample exhaust gas is dried before the		
emissions are analysed)		
Temperature	USEPA Method 4	CAPCS
		CHP
		ASP

With reference to the EM&A Manual, the air emission of the stacks shall meet the following emission limits as presented in *Tables 3.2* to *3.5*.

TABLE 3.2 EMISSION LIMIT FOR CAPCS STACK

Parameter	Emission Level (mg/Nm³) (a)
VOCs (including methane)	680
Dust (or Total Suspended Particulates (TSP))	6
Odour (including NH ₃ & H ₂ S)	220 ^(b)

Notes:

- (a) Hourly average concentration
- (b) The odour unit is OU/Nm³

TABLE 3.3 EMISSION LIMIT FOR CHP STACK

Parameter	Maximum Emission Level (mg/Nm³) (a) (b)
Dust (or Total Suspended Particulates)	15
Carbon Monoxide	650
NO _x	300
NO _x SO ₂	50
NMVOCs (c)	150
VOCs (including methane) (d)	1,500
HCI	10
HF	1

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) Hourly average concentration
- (c) NMVOCs should be monitored by gas sampling and laboratory analysis at an agreed interval. For the first 12 months (starting from August 2019), monitoring should be carried out at quarterly intervals. The monitoring frequency should then be reduced to half-yearly for next 12 months (starting from August 2020).
- (d) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.

TABLE 3.4 EMISSION LIMIT FOR ASP STACK

Parameter	Maximum Emission Level (mg/Nm³) (a) (b)
Dust (or Total Suspended Particulates)	5
Carbon Monoxide	100
NOx	200
SO ₂	50
VOCs (including methane) (c)	20
NH ₃	35



Parameter	Maximum Emission Level (mg/Nm³) (a) (b)
HCI	10
HF	1

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 11% and dry basis.
- (b) Hourly average concentration
- (c) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.

TABLE 3.5 EMISSION LIMIT FOR STANDBY FLARING GAS UNIT (2)

Parameter	Maximum Emission level (mg/Nm³) (a) (b)
Dust (or Total Suspended Particulates)	5
Carbon Monoxide	100
NO _x SO ₂	200
SO ₂	50
VOCs (including methane) (c)	20
HCI	10
HF	1

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 11% and dry basis.
- (b) Hourly average concentration
- (c) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.

3.1.2 ODOUR

To determine the effectiveness of the proposed odour mitigation measures and to ensure that the operation of the ORRC1 will not cause adverse odour impacts, odour monitoring of the CAPCS stack (see Section 3.1.1) and odour patrol will be carried out.

Odour patrol shall be conducted by independent trained personnel/ competent persons in summer months (i.e., from July to September) for the first two operational years of ORRC1 at monthly intervals along an odour patrol route at the Project Site boundary as shown in Annex Α.

The perceived odour intensity is divided into 5 levels. Table 3.6 describes the odour intensity for different levels.

TABLE 3.6 ODOUR INTENSITY LEVEL

Level	Odour Intensity
0	Not detected. No odour perceived or an odour so weak that it cannot be easily characterised or described
1	Slight identifiable odour, and slight chance to have odour nuisance
2	Moderate identifiable odour, and moderate chance to have odour nuisance
3	Strong identifiable odour, likely to have odour nuisance
4	Extreme severe odour, and unacceptable odour level

Table 3.7 shows the action level and limit level to be used for odour patrol. Should any exceedance of the action and limit levels occur, actions in accordance with the event and action plan in *Table 3.8* should be carried out.

⁽²⁾ A standby facility. Only operate when the CHPs are not in operation or when the biogas generated exceeded the utilisation rate of the CHPs.



TABLE 3.7 ACTION AND LIMIT LEVELS FOR ODOUR NUISANCE

Parameter	Action Level	Limit Level
Odour Nuisance (from odour patrol)	When one documented compliant is received ^(a) , or Odour Intensity of 2 is measured from odour patrol.	Two or more documented complaints are received (a) within a week; or Odour intensity of 3 or above is measured from odour patrol.

Note:

(a) Once the complaint is received by the Project Proponent (EPD), the Project Proponent would investigate and verify the complaint whether it is related to the potential odour emission from the ORRC1 and its on-site wastewater treatment unit.

TABLE 3.8 EVENT AND ACTION PLAN FOR ODOUR MONITORING

Event	Action			
	Person-in-charge of Odour Monitoring	Project Proponent (a)		
Action Level				
Exceedance of action level (Odour Patrol)	 Identify source/reason of exceedance; Repeat odour patrol to 	 Carry out investigation to identify the source/reason of exceedance. Investigation should be completed within 2 weeks; 		
		2. Rectify any unacceptable practice;		
		3. Implement more mitigation measures if necessary;		
		 Inform Drainage Services Department (DSD) or the operator of the Siu Ho Wan Sewage Treatment Works (SHWSTW) if exceedance is considered to be caused by the operation of the SHWSTW; and 		
		Inform North Lantau Refuse Transfer Station (NLTS) operator if exceedance is considered to be caused by the operation of NLTS.		
Exceedance of action level (Odour	Identify source/reason of exceedance; Carry out odour patrol to	 Carry out investigation and verify the complaint whether it is related to potential odour emission from the nearby SHWSTW; 		
Complaints)	, , , , , , , , , , , , , , , , , , , ,	Carry out investigation to identify the source/reason of exceedance. Investigation should be completed within 2 weeks;		
		3. Rectify any unacceptable practice;		
		4. Implement more mitigation measures if necessary;		
		Inform DSD or the operator of the SHWSTW if exceedance is considered to be caused by the operation of the SHWSTW; and		
		Inform NLTS operator if exceedance is considered to be caused by the operation of NLTS.		
Limit Level				
Exceedance of limit level	exceedance;	Carry out investigation to identify the source/reason of exceedance. Investigation should be completed within 2 weeks.		
	2. Inform EPD;	within 2 week;		
	or repeat data, patrol to	 Rectify any unacceptable practice; Formulate remedial actions; 		
	4. Increase odour patrol	4. Ensure remedial actions properly implemented;		
	frequency to bi-weekly; 5. Assess effectiveness of remedial action and keep	 If exceedance continues, consider what more/enhanced mitigation measures should be implemented; and 		



Event	Action			
	Person-in-charge of Odour Monitoring	Project Proponent (a)		
	EPD informed of the results; 6. If exceedance stops, cease additional odour patrol.	6. Inform DSD or the operator of the SHWSTW if exceedance is considered to be caused by the operation of the SHWSTW.		

Note:

(a) Project Proponent shall identify an implementation agent.

3.2 SITE AUDIT

Environmental mitigation measures (related to air quality, water quality, waste, land contamination, hazard-to-life, and landscape and visual) to be implemented during the operation phase of the Project are recommended in the approved EIA Report and EM&A Manual and are summarised in *Annex C*. Monthly site audits for operation phase will be carried out to check the implementation of these measures.

3.2.1 WATER QUALITY

Compliance audits are to be undertaken to ensure that a valid discharge licence has been issued by EPD prior to the discharge of effluent from the operation of the Project site. Under Effluent Discharge Licence WT00038391-2021 (effective from July 2021), the effluent quality shall meet the discharge limits as described in *Table 3.9* and *Table 3.10*.

TABLE 3.9 DISCHARGE LIMITS FOR EFFLUENT FROM THE EFFLUENT STORAGE TANK (AS STIPULATED IN WT00038391-2021)

Parameters	Discharge Limit (mg/L)
Flow Rate (m³/day) (a)	645
pH (pH units) (b)	6-10 ^(c)
Suspended Solids (b)	800
Biochemical Oxygen Demand (5 days, 20°) (b)	800
Chemical Oxygen Demand (b)	2,000
Oil & Grease (b)	40
Total Nitrogen (b)	200
Total Phosphorus (b)	50
Surfactants (total) (b)	25

Notes

- (a) Flow rate is not a parameter required to be monitored and reported by the Contractor in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be monitored and reported by the Contractor in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Range.

TABLE 3.10 DISCHARGE LIMITS FOR EFFLUENT FROM THE PETROL INTERCEPTOR(S) (AS STIPULATED IN TW00038391-2021)

Parameters	Discharge Limit (mg/L)
Flow Rate (m³/day) (a)	245 ^(a)
Suspended Solids (b)	30
Chemical Oxygen Demand (c)	80
Oil & Grease (c)	20
Surfactants (total) (b)	15



Parameters Discharge Limit (mg/L)

Notes:

- (a) The surface runoff flow rate limit was estimated by the overall yearly rainfall data. As the actual flowrate from the petrol interceptors depends on the weather condition instead of the performance of the petrol interceptor, monitoring and reporting of this parameter is not required. Hence this parameter is not reported in *Table 4.10* and *Table 4.11*.
- (b) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.

3.2.2 LANDSCAPE AND VISUAL

In accordance with EM&A Manual, the landscape and visual mitigation measures shall be implemented.

For operation phase, site inspection shall be conducted once a month for the first year of operation of the Project. All measures as stated in the implementation schedule of the EM&A Manual (see *Annex C*), including compensatory planting, undertaken by both the Contractor and the specialist Landscape Sub-Contractor during the first year of the operation phase shall be audited by a Registered Landscape Architect (RLA) to ensure compliance with the intended aims of the measures and the effectiveness of the mitigation measures.



MONITORING RESULTS

4.1 AIR QUALITY

4.1.1 OPERATION PHASE MONITORING

The concentrations of concerned air pollutants emitted from the stacks of the CAPCS, CHP, and ASP during the reporting period are monitored on-line by the continuous environmental monitoring system (CEMS).

During the reporting period, a Periodic Inspection for the Fixed Electrical Installations – High Voltage (HV) Inspection was conducted on 12 December 2023. In preparation for this HV Inspection, the Standby Gas Flaring Unit was tested on 8 December 2023 from 5:00PM to 7:00PM and from 10:00PM until 12:00AM (midnight). Since the Standby Gas Flaring Unit was run under test conditions during these periods, no values are included in *Table 4.6* for these dates as this is not the normal condition/operation of the flare.

With reference to the emission limits shown in *Tables 3.2, 3.3* and *3.4*, the hourly average concentrations and the number of exceedances of the concerned air emissions monitored for the CAPCS, CHP and ASP during this reporting period are presented in *Tables 4.1* to *4.5*.

It should be noted that measurements recorded under abnormal operating conditions, e.g., start up and stopping of stacks and unstable operation, as well as test runs and interference of sensor, are disregarded.

TABLE 4.1 HOURLY AVERAGE OF PARAMETERS RECORDED FOR CAPCS

Parameter	Range of Hourly Average Conc. (mg/Nm³)	Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
VOCs (including methane) (a)	0.00 - 632.21	680	Nil	Nil
Dust (or TSP)	0.00 - 0.03	6	Nil	Nil
Odour (including NH ₃ & H ₂ S) ^(b)	0.00 - 1,181.75	220	Identified ^(c)	System unstable (e.g., low efficiency)

Note:

- (a) The VOCs emission limit includes methane as biogas is adopted, as fuel in the combustion process.
- (b) The odour unit is OU/Nm³.
- (c) Dates with Odour exceedances (number of exceedances on that day) were identified on 17(6), 18(12), 19(5), 23(1), and 24(3) January 2024; 1(2), 4(1), 5(16), 6(18), and 7(8) February 2024.

TABLE 4.2 HOURLY AVERAGE OF PARAMETERS RECORDED FOR CHP 1

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
Dust (or TSP)	0 - 10	15	Nil	Nil
Carbon Monoxide	0 - 406	650	Nil	Nil
NO _x	0 - 2,640	300	Identified ^(c)	System unstable (e.g., low efficiency)
SO ₂	0 - 873	50	Identified ^(d)	System unstable (e.g., low efficiency)



Parameter	Range of Hourly Average Conc. (mg/Nm³) ^(a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
VOCs (including methane) (b)	0 - 1,258	1,500	Nil	Nil
HCI	0 - 29	10	Identified ^(e)	System unstable (e.g., low efficiency)
HF	0 - 1	1	Nil	Nil

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) The VOCs emission limit includes methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with NO $_{\rm x}$ exceedances (number of exceedances on the day) were identified on 1(5), 2(3), 3(3), 4(12), 5(4), 6(24), 7(24), 8(21), 9(21), 10(24), 11(24), 12(13), 13(19), 14(18), 15(20), 16(24), 17(24), 18(21), 19(19), 20(21), 21(24), 22(24), 23(22), 24(20), 25(24), 26(24), 27(23), 28(24), 29(24), 30(24), and 31(24) December 2023; 1(24), 2(23), 3(24), 4(24), 5(24), 6(24), 7(24), 8(22), 9(8), 10(15), 11(18), 12(22), 13(20), 14(24), 15(24), 16(20), 17(19), 18(14), 19(17), 20(24), 21(24), 22(24), 23(24), 24(14), 25(13), 26(6), 27(21), 28(24), 29(24), 30(10), and 31(2) January 2024; 1(18), 2(20), 3(21), 4(22), 5(10), 6(24), 7(24), 8(11), 9(24), 10(24), 11(24), 12(24), 13(24), 14(24), 15(21), 16(24), 17(24), 18(24), 19(24), 20(24), 21(17), 22(8), 23(15), 24(19), 25(24), 26(24), 27(24), 28(24), and 29(23) February 2024.
- (d) Dates with SO_2 exceedances (number of exceedances on the day) were identified on 1(3), 3(3), 4(10), 5(4), 6(23), 7(20), 8(18), 9(20), 10(23), 11(7), 12(7), 13(14), 14(19), 15(20), 16(24), 17(2), 18(14), 19(16), 20(16), 21(10), 22(16), 23(11), 24(12), 25(13), 26(16), 27(8), 28(24), 29(20), 30(24), and 31(23) December 2023; 1(24), 2(17), 3(18), 4(1), 5(7), 6(23), 7(24), 8(18), 9(5), 10(7), 11(18), 12(17), 13(18), 14(22), 15(23), 16(18), 17(17), 18(11), 19(3), 20(14), 21(10), 22(4), 23(8), 24(14), 25(9), 26(6), 27(16), 28(13), 29(19), 30(10), and 31(2) January 2024; 1(18), 2(20), 3(21), 4(22), 5(10), 6(24), 7(24), 8(9), 9(21), 10(24), 11(24), 12(24), 13(24), 14(24), 15(18), 16(17), 17(23), 18(14), 19(11), 20(24), 21(17), 22(8), 23(15), 24(17), 25(21), 26(20), 27(23), 28(20), and 29(23) February 2024.
- (e) Dates with HCl exceedances (number of exceedances on the day) were identified on 4(1) December 2023 and 8(1) January 2024.

TABLE 4.3 HOURLY AVERAGE OF PARAMETERS RECORDED FOR CHP 2

Parameter	Range of Hourly Average Conc. (mg/Nm³) ^(a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
Dust (or TSP)	0 - 3	15	Nil	Nil
Carbon Monoxide	0 - 143	650	Nil	Nil
NO _x	0 - 473	300	Identified ^(c)	System unstable (e.g., low efficiency)
SO ₂	0 - 139	50	Identified (d)	System unstable (e.g., low efficiency)
VOCs (including methane) (b)	0 - 1,336	1,500	Nil	Nil
HCI	0 – 2	10	Nil	Nil
HF	0 - 0	1	Nil	Nil

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) The VOCs emission limit includes methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with NO_x exceedances (number of exceedances on the day) were identified on 2(2), 4(5), 5(4), 6(3), 8(4), 10(1), 11(3), 12(4), 13(1), 14(6), 15(16), 16(1), 17(1), 19(7), 20(10), 21(4), 23(7), 24(4), 26(1), 27(2), 29(5), 30(23), and 31(24) December 2023; 1(23), 2(23), 3(18), 4(24), 5(24), 6(24), 7(24), 8(24), 9(18), 10(22), 11(15), 12(5), 13(16), 14(24), 15(23), 16(4), 25(3),



	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
	(mg/Nm³) (a)			

26(24), 27(24), and 28(6) January 2024; 8(10), 9(19), 10(17), 11(14), 12(7), 13(10), 14(12), 15(1), 16(1), 18(6), 19(5), 21(1), 22(7), 23(21), 24(12), 25(18), 26(2), 27(18), 28(23), and 29(15) February 2024.

(d) Dates with SO_2 exceedances (number of exceedance on the day) were identified on 1(21), 2(14), 3(20), 4(22), 5(22), 6(24), 7(21), 8(18), 9(4), 10(9), 11(1), 12(3), 13(6), 15(2), 16(2), 17(16), 18(13), 19(12), 20(6), 29(4), 30(16), and 31(10) December 2023; 6(2) and 8(2) January 2024; 10(1), 11(2), and 13(1) February 2024.

TABLE 4.4 HOURLY AVERAGE OF PARAMETERS RECORDED FOR CHP 3

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks
Dust (or TSP)	0 - 13	15	Nil	Nil
Carbon Monoxide	0 - 137	650	Nil	Nil
NO _x	0 – 504	300	Identified (c)	System unstable (e.g., low efficiency)
SO ₂	0 - 181	50	Identified (d)	System unstable (e.g., low efficiency)
VOCs (including methane) (b)	0 - 1,182	1,500	Nil	Nil
HCI	0 – 2	10	Nil	Nil
HF	0 - 1	1	Nil	Nil

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) The VOCs emission limit includes methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with NO $_{\times}$ exceedances (number of exceedances on the day) were identified on 16(1), 17(4), 18(13), 19(6), 21(8), 22(8), 25(1), 28(9), 29(13), 30(2), and 31(2) January 2024; 1(1), 5(4), 6(3), 10(1), 13(3), 14(2), 15(1), 16(1), 17(2), 18(16), and 26(5) February 2024.
- (d) Dates with SO_2 exceedances (number of exceedance on the day) was identified on 16(4), 17(22), 18(21), 19(16), 20(19), 21(19), 22(6), 23(5), 24(2), 25(8), 28(7), 29(12), 30(1), and 31(2) January 2024; 1(5), 2(5), 3(3), 5(8), 6(11), 9(2), 10(2), 11(7), 12(6), 13(6), 14(6), 15(7), 16(5), 17(7), 18(10), 19(1), and 26(3) February 2024.

TABLE 4.5 HOURLY AVERAGE OF PARAMETERS RECORDED FOR ASP

Parameter	Range of Hourly Average Conc. (mg/Nm³) ^(a)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks
Dust (or TSP)	0 – 4	5	Nil	Nil
Carbon Monoxide	0 – 96	100	Nil	Nil
NO _x	0 - 30,165	200	Identified ^(c)	System unstable (e.g., low efficiency, unstable column temperature)
SO ₂	0 – 2,451	50	Identified ^(d)	System unstable (e.g., low efficiency, unstable column temperature)
VOCs (including methane) (b)	0 - 19	20	Nil	Nil
NH ₃	0 – 20,000	35	Identified ^(e)	System unstable (e.g., low efficiency, unstable column temperature)



Parameter	Range of Hourly Average Conc. (mg/Nm ³) ^(a)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks
HCI	0 – 256	10	Identified ^(f)	System unstable (e.g., low efficiency, unstable column temperature)
HF	0 - 1	1	Nil	Nil

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 11% and dry basis.
- (b) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with NO_x exceedances (number of exceedances on the day) were identified on 1(3), 4(1), 5(3), 10(1), 11(3), 12(2), 13(2), 14(12), 15(22), 16(20), 17(19), 18(22), 19(19), 20(15), 21(19), 22(3), 23(19), 24(19), 25(23), 26(22), 27(9), 28(11), 29(9), 30(1), and 31(1) December 2023; 3(3), 4(14), 5(10), 6(3), 7(8), 8(15), 9(16), 10(20), 11(23), 12(9), 13(9), 14(3), 15(3), 16(13), 17(4), 18(2), 19(11), 20(21), 21(15), 22(12), 23(16), 24(20), 25(14), 26(7), 27(21), 28(24), 29(16), 30(20), and 31(4) January 2024; 1(8), 2(3), 3(7), 4(2), 5(4), 6(7), 8(3), 9(9), 10(23), 11(19), 12(14), 13(13), 14(17), 15(16), 16(16), 17(15), 18(18), 19(19), 20(22), 21(18), 22(9), 23(4), 24(5), 25(3), 26(5), 27(7), 28(11), and 29(17) February 2024.
- (d) Dates with SO_2 exceedances (number of exceedances on the day) were identified on 5(2), 9(4), 12(5), 13(1), 15(1), 16(2), 17(13), 18(2), 21(2), 22(1), 23(3), 26(1), 28(11), 29(9), 30(23), and 31(16) December 2023; 6(19), 7(24), 8(8), 18(4), 20(2), 21(2), 23(1), 24(3), 25(13), 26(2), 29(7), and 30(6) January 2024; 1(6), 2(6), 3(5), 5(1), 6(23), 7(7), 8(4), 11(4), 12(2), 13(1), 14(1), 23(1), and 26(2) February 2024.
- (e) Dates with NH $_3$ exceedances (number of exceedances on the day) were identified on 1(4), 2(8), 3(8), 4(8), 5(2), 6(11), 7(11), 8(18), 9(8), 10(3), 11(4), 12(8), 13(7), 15(3), 16(2), 17(15), 18(3), 20(1), 22(10), 23(19), 24(20), 25(24), 26(24), 27(9), 28(11), 29(10), 30(1), and 31(8) December 2023; 1(16), 2(8), 3(3), 5(1), 9(5), 10(3), 11(2), 12(6), 13(2), 15(3), 16(10), 18(12), 19(9), 22(5), 23(5), 24(5), 25(14), 26(7), 27(21), 28(23), 29(15), 30(9), and 31(4) January 2024; 1(1), 2(3), 3(6), 4(7), 5(6), 8(3), 9(9), 14(2), 15(1), 16(2), 17(1), 23(12), 24(12), 25(3), 26(9), 27(3), 28(1), and 29(2) February 2024.
- (f) Dates with HCl exceedances (number of exceedances on the day) were identified on 17(13), 18(2), 22(1), 23(18), 24(19), 25(23), 26(22), 27(9), 28(10), and 29(9) December 2023; 15(3), 16(10), 23(5), 24(4), 25(14), 26(7), 27(21), 28(23), 29(16), and 30(8) January 2024.

TABLE 4.6 HOURLY AVERAGE OF PARAMETERS RECORDED FOR THE STANDBY FLARING GAS UNIT

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)(c)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks ^(d)
Dust (or TSP)	0 - 0	5	Nil	Nil
Carbon Monoxide	0 - 0	100	Nil	Nil
NOx	0 - 0	200	Nil	Nil
SO ₂	0 - 0	50	Nil	Nil
VOCs (including methane) (b)	0 - 0	20	Nil	Nil
HCI	0 - 0	10	Nil	Nil
HF	0 - 0	1	Nil	Nil

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 11% and dry basis.
- (b) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.
- (c) The standby flare did not operate during the reporting period.



4.2 ODOUR

4.2.1 OPERATION PHASE MONITORING

No odour patrol was required to be conducted for this reporting period.

Five (5) Environmental Complaints regarding odour nuisance were received at the facility on 19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024. Mitigation measures were implemented, daily odour patrols were arranged, and interim reports regarding the complaints received were submitted to EPD on 3 March 2024 and 8 March 2024.

The full investigation reports of the Environmental Complaints are presented in Annex F.

4.3 WATER QUALITY

4.3.1 OPERATION PHASE MONITORING

Effluent discharge was sampled monthly from the outlet chamber of the Effluent Storage Tank as stipulated in the operation phase discharge licence. Discharge from the Petrol Interceptors have been sampled bi-monthly since July 2021 as stipulated in the operation phase discharge licence. The results of the discharge samples from the outlet chamber of the Effluent Storage Tank are recorded in *Table 4.7* to *4.9*. The results of the discharge samples from the Petrol Interceptors are recorded in *Table 4.10* to *4.13*.

TABLE 4.7 RESULTS OF THE DISCHARGE SAMPLE COLLECTED FROM THE OUTLET CHAMBER OF THE EFFLUENT STORAGE TANK IN DECEMBER 2023

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Flow Rate (m³/day) (a)	32 - 231 ^(e)	645	Yes
pH (pH units) (b)	7.30 - 7.90 ^(e)	6-10 ^(c)	Yes
Suspended Solids (b) (d)	214 ^(d)	800	Yes
Biochemical Oxygen Demand (5 days, 20°) (b) (d)	27 ^(d)	800	Yes
Chemical Oxygen Demand (b) (d)	1,030 ^(d)	2,000	Yes
Oil & Grease (b) (d)	<5 ^(d)	40	Yes
Total Nitrogen (b) (d)	100 ^(d)	200	Yes
Total Phosphorus (b) (d)	33.4 ^(d)	50	Yes
Surfactants (total) (b) (d)	<1.0 ^(d)	25	Yes

Notes:

- (a) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Daily Range.
- (d) Effluent sample collected on 13 December 2023.
- (e) Data collected daily in the reporting month.

TABLE 4.8 RESULTS OF THE DISCHARGE SAMPLE COLLECTED FROM THE OUTLET CHAMBER OF THE EFFLUENT STORAGE TANK IN JANUARY 2024

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Flow Rate (m ³ /day) (a)	0 - 227 ^(e)	645	Yes
pH (pH units) (b)	7.30 - 8.00 ^(e)	6-10 ^(c)	Yes
Suspended Solids (b) (d)	131 ^(d)	800	Yes



Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Biochemical Oxygen Demand (5 days, 20°) (b) (d)	47 ^(d)	800	Yes
Chemical Oxygen Demand (b) (d)	954 ^(d)	2,000	Yes
Oil & Grease (b) (d)	<5 ^(d)	40	Yes
Total Nitrogen (b) (d)	164 ^(d)	200	Yes
Total Phosphorus (b) (d)	33.1 ^(d)	50	Yes
Surfactants (total) (b) (d)	1.9 ^(d)	25	Yes

Notes:

- (a) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Daily Range.
- (d) Effluent sample collected on 4 January 2024.
- (e) Data collected daily in the reporting month.

TABLE 4.9 RESULTS OF THE DISCHARGE SAMPLE COLLECTED FROM THE OUTLET CHAMBER OF THE EFFLUENT STORAGE TANK IN FEBRUARY 2024

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Flow Rate (m ³ /day) (a)	27 - 259 ^(e)	645	Yes
pH (pH units) (b)	7.60 - 8.40 ^(e)	6-10 ^(c)	Yes
Suspended Solids (b) (d)	138 ^(d)	800	Yes
Biochemical Oxygen Demand (5 days, 20°) (b) (d)	18 ^(d)	800	Yes
Chemical Oxygen Demand (b) (d)	659 ^(d)	2,000	Yes
Oil & Grease (b) (d)	<5 ^(d)	40	Yes
Total Nitrogen (b) (d)	99.4 ^(d)	200	Yes
Total Phosphorus (b) (d)	18.4 ^(d)	50	Yes
Surfactants (total) (b) (d)	1.3 ^(d)	25	Yes

Notes:

- (a) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Daily Range.
- (d) Effluent sample collected on 16 February 2024.
- (e) Data collected daily in the reporting month.



TABLE 4.10 RESULTS OF THE DISCHARGE SAMPLE FROM THE PETROL INTERCEPTOR 1 IN DECEMBER 2023

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Suspended Solids (b)	23 ^(a)	30	Yes
Chemical Oxygen Demand (c)	53 ^(a)	80	Yes
Oil & Grease (c)	11 ^(a)	20	Yes
Surfactants (total) (b)	<1.0 ^(a)	15	Yes

Notes:

- (a) Effluent sample collected on 13 December 2023.
- (b) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.

TABLE 4.11 RESULTS OF THE DISCHARGE SAMPLE FROM THE PETROL INTERCEPTOR 2 IN DECEMBER 2023

Parameters	Discharged Effluent	Discharge Limit	Compliance with
	Concentration (mg/L)	(mg/L)	Discharge Limit
Suspended Solids (b)	<2 ^(a)	30	Yes
Chemical Oxygen Demand (c)	<5 ^(a)	80	Yes
Oil & Grease (c)	<5 ^(a)	20	Yes
Surfactants (total) (b)	<1.0 ^(a)	15	Yes

Notes:

- (a) Effluent sample collected on 20 December 2023.
- (b) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.

TABLE 4.12 RESULTS OF THE DISCHARGE SAMPLE FROM THE PETROL INTERCEPTOR 1 IN FEBRUARY 2024

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Suspended Solids (b)	<2 ^(a)	30	Yes
Chemical Oxygen Demand (c)	<5 ^(a)	80	Yes
Oil & Grease (c)	<5 ^(a)	20	Yes
Surfactants (total) (b)	<1.0 ^(a)	15	Yes

Notes:

- (a) Effluent sample collected on 21 February 2024.
- (b) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.



TABLE 4.13 RESULTS OF THE DISCHARGE SAMPLE FROM THE PETROL INTERCEPTOR 2 IN FEBRUARY 2024

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Suspended Solids (b)	11 ^(a)	30	Yes
Chemical Oxygen Demand (c)	10 ^(a)	80	Yes
Oil & Grease (c)	<5 ^(a)	20	Yes
Surfactants (total) (b)	<1.0 ^(a)	15	Yes

Notes:

- (a) Effluent sample collected on 7 February 2024.
- (b) Parameter not required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance with Section B2 of the Effluent Discharge Licence under the WPCO.

4.4 WASTE MANAGEMENT

4.4.1 OPERATION PHASE MONITORING

Wastes generated from the operation of the Project include chemical waste, wastes generated from pre-treatment process and general refuse ⁽³⁾. Reference has been made to the Monthly Summary Waste Flow Tables prepared by the Contractor (see *Annex D*). With reference to the relevant handling records and trip tickets of this Project, the quantities of different types of waste generated from the operation of the Project in the reporting period are summarised in *Table 4.14*.

TABLE 4.14 QUANTITIES OF WASTE GENERATED FROM THE OPERATION OF THE PROJECT

Month / Year	Chemical Waste	Waste Generated from Pre-treatment Process		General Refuse	
	Disposal of at CWTC	Disposed of at Landfill (a)	Recycled (b)	Disposed of at Landfill (a) (e)	Recycled (c)
December 2023	0 L ^(d)	1006.03 tonnes	0.000 tonnes	2.765 tonnes (e)	0.016 tonnes
January 2024	1,200 L ^(d)	830.42 tonnes	0.000 tonnes	2.995 tonnes (e)	0.126 tonnes
February 2024	400 L ^(d)	901.23 tonnes	0.000 tonnes	2.534 tonnes (e)	0.105 tonnes

Notes:

- (a) Waste generated from pre-treatment process and general refuse other than chemical waste and recyclables were disposed of at NENT landfill by sub-contractors.
- (b) Among waste generated from pre-treatment process, 0.000 tonnes of metals, 0.000 tonnes of papers/ cardboard packing and 0.000 tonnes of plastics were sent to recyclers for recycling during the reporting period.
- (c) Among general refuse, 0.012 tonnes of metals, 0.199 tonnes of papers/ cardboard packing and 0.036 tonnes of plastics were sent to recyclers for recycling during the reporting period.
- (d) No chemical waste was disposed of during December 2023; 1,200 L of chemical waste (spent lube oil) was disposed of at CWTC in January 2024; 400 L of chemical waste (spent lube oil) was disposed of at CWTC in February 2024.
- (e) It was assumed that four 240-litre bins filled with 80% of general refuse were collected at each collection. The general refuse density was assumed to be around 0.15 kg/L.

⁽³⁾ Public fill and construction waste may only be generated during maintenance works when there are civil or structural works.



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5. SITE AUDIT

5.1 ENVIRONMENTAL SITE AUDIT

5.1.1 OPERATION PHASE

The monthly inspections of the operation phase of the Project covered the operation phase environmental site inspections. The inspections checked the implementation of the recommended mitigation measures for air quality, landscape and visual, water quality, waste (land contamination) and hazard-to-life stated in the Implementation Schedule (see *Annex C*).

Follow-up actions resulting from the site inspections were generally taken as reported by the Contractor. The Contractor has implemented environmental mitigation measures recommended in the approved EIA Report and EM&A Manual.

December 2023

The monthly inspection of the operation phase of the Project on 19 December 2023 covered the operation phase environmental site audit. Joint site inspections were conducted by representatives of the Contractor, IEC and the MT on 19 December 2023 as required for the operation of the Project.

January 2024

The monthly inspection of the operation phase of the Project on 25 January 2024 covered the operation phase environmental site audit. Joint site inspections were conducted by representatives of the Contractor, IEC and the MT on 25 January 2024 as required for the operation of the Project.

February 2024

The monthly inspection of the operation phase of the Project on 27 February 2024 covered the operation phase environmental site audit. Joint site inspections were conducted by representatives of the Contractor, IEC and the MT on 27 February 2024 as required for the operation of the Project.

Odour mitigation measures were observed being implemented at the Suspension Buffer Tank (SBT), including fans, deodourisers, and canvas barriers around the working area. During the sitewalk, the odour around the SBT tank was not any more noticeable than normal levels.

Apart from the observation above, the Contractor has implemented environmental mitigation measures recommended in the approved EIA Report and EM&A Manual.

5.2 LANDSCAPE AND VISUAL AUDIT

It was confirmed that the necessary landscape and visual mitigation measures during the operation phase as summarised in *Annex C* were generally implemented by the Contractor. No non-compliance in relation to the landscape and visual mitigation measures was identified during the site audits in this reporting period and therefore no further actions are required. The ET/MT will keep track of the EM&A programme to check compliance with environmental requirements and the proper implementation of all necessary mitigation measures.

December 2023



Monthly inspection of the landscape and visual mitigation measures for the operation phase of the Project was performed on 19 December 2023.

January 2024

Monthly inspection of the landscape and visual mitigation measures for the operation phase of the Project was performed on 25 January 2024.

February 2024

Monthly inspection of the landscape and visual mitigation measures for the operation phase of the Project was performed on 27 February 2024.



ENVIRONMENTAL NON-CONFORMANCE

6.1 SUMMARY OF ENVIRONMENTAL NON-COMPLIANCE

December 2023

Non-compliance of emission limits of NO_x , SO_2 , and HCl from the CHPs, as well as NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during the reporting period.

All analytes from the outlet chamber of the effluent storage tank and Petrol Interceptors were recorded to be in compliance with discharge limits during the reporting period.

The Contractor has reviewed the organic waste treatment processes (i.e., waste reception, waste pre-treatment, anaerobic digesters, and composting processes) and found that they were operated normally during the reporting period. The Contractor has investigated the desulphurisation system, CHPs and the ASP, the potential causes for the exceedance were identified.

The investigation reports of the above exceedances are presented in *Annex F*.

January 2024

Non-compliance of emission limits of Odour from CAPCS; NO_x , SO_2 , and HCl from the CHPs; and NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during the reporting period.

All analytes from the outlet chamber of the effluent storage tank were recorded to be in compliance with discharge limits during the reporting period.

The Contractor has reviewed the organic waste treatment processes (i.e., waste reception, waste pre-treatment, anaerobic digesters, and composting processes) and found that they were operated normally during the reporting period. The Contractor has investigated the desulphurisation system, CAPCS, CHPs, the ASP and the Effluent treatment system, the potential causes for the exceedance were identified.

The investigation reports of the above exceedances are presented in *Annex F*.

February 2024

Non-compliance of emission limits of Odour from CAPCS; NO_x and SO_2 from the CHPs; and NO_x , SO_2 , and NH_3 from the ASP were recorded during the reporting period.

All analytes from the outlet chamber of the effluent storage tank and Petrol Interceptors were recorded to be in compliance with discharge limits during the reporting period.

The Contractor has reviewed the organic waste treatment processes (i.e., waste reception, waste pre-treatment, anaerobic digesters, and composting processes) and found that they were operated normally during the reporting period. The Contractor has investigated the desulphurisation system, CAPCS, CHPs, and the ASP; the potential causes for the exceedance were identified.

The investigation reports of the above exceedances are presented in *Annex F*.

6.2 SUMMARY OF ENVIRONMENTAL COMPLAINT

Five (5) Environmental Complaints regarding odour nuisance were received at the facility on 19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024.



Mitigation measures were implemented, daily odour patrols were arranged, and interim reports regarding the complaints received were submitted to EPD on 3 March 2024 and 8 March 2024. The full investigation reports of the Environmental Complaints are presented in $Annex\ F$.

6.3 SUMMARY OF ENVIRONMENTAL SUMMON AND SUCCESSFUL PROSECUTION

No summon/prosecution was received during the reporting period. The cumulative summons/prosecution log is shown in *Annex E*.



7. FUTURE KEY ISSUES

7.1 KEY ISSUES FOR THE COMING REPORTING PERIOD

Activities to be undertaken for the coming reporting period are:

- Operation of the Project;
- Complete planned maintenance work of Wet scrubber No. 2;
- Focus on centrifuge area and polymer dosing system for the month;
- Focus on sieve fine plastic;
- Install new pipeline at leachate tank;
- Clean PST;
- Install drum screen for IPS;
- SBT Cleaning; and
- Checking on AD3 pressure relief valve.



8. CONCLUSIONS

This EM&A Report presents the EM&A programme undertaken during the reporting period from **1 December 2023** to **29 February 2024** in accordance with EM&A Manual (Version F) and requirements of EP (FEP-01/395/2010/C).

For the operation phase, exceedances of the emission limits for stack monitoring (including CAPCS, CHP and ASP stacks) were recorded under normal operating conditions during the reporting period (see *Table 8.1*).

TABLE 8.1 EXCEEDANCES FOR STACK EMISSIONS

Stack	Exceedances During the Reporting Period	
Centralised Air Pollution Control Unit (CAPCS)	• Exceeded emission limit of Total Odour (NH₃ and H₂S) on 17, 18, 19, 23, and 24 January 2024; 1, 4, 5, 6, and 7 February 2024.	
Cogeneration Unit (CHP) 1	 Exceeded emission limit of SO₂ on 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 December 2023; 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 January 2024; 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, and 29 February 2024. Exceeded emission limit of NO_x on 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 December 2023; 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 January 2024; 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, and 29 February 2024. Exceeded emission limit of HCl on 4 December 2023 and 8 January 2024. 	
Cogeneration Unit (CHP) 2	 Exceeded emission limit of NO_x on 2, 4, 5, 6, 8, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 23, 24, 26, 27, 29, 30, and 31 December 2023; 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 25, 26, 27, and 28 January 2024; 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, and 29 February 2024. Exceeded emission limit of SO₂ on 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 29, 30, and 31 December 2023; 6 and 8 January 2024; 10, 11, and 13 February 2024. 	
Cogeneration Unit (CHP) 3	 Exceeded emission limit of NO_x on 16, 17, 18, 19, 21, 22, 25, 28, 29, 30, and 31 January 2024; 1, 5, 6, 10, 13, 14, 15, 16, 17, 18, and 26 February 2024. Exceeded emission limit of SO₂ on 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 28, 29, 30, and 31 January 2024; 1, 2, 3, 5, 6, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, and 26 February 2024. 	



Stack **Exceedances During the Reporting Period** Ammonia Stripping Plant (ASP) Exceeded emission limit of NO_x on 1, 4, 5, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 December 2023; 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 January 2024; 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, and 29 February 2024. Exceeded emission limit of SO₂ on 5, 9, 12, 13, 15, 16, 17, 18, 21, 22, 23, 26, 28, 29, 30, and 31 December 2023; 6, 7, 8, 18, 20, 21, 23, 24, 25, 26, 29, and 30 January 2024; 1, 2, 3, 5, 6, 7, 8, 11, 12, 13, 14, 23, and 26 February 2024. Exceeded emission limit of NH₃ on 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31 December 2023; 1, 2, 3, 5, 9, 10, 11, 12, 13, 15, 16, 18, 19, 22,

23, 24, 25, 26, 27, 28, 29, 30, and 31 January 2024; 1, 2, 3, 4, 5, 8, 9, 14, 15, 16, 17, 23, 24, 25, 26, 27, 28, and 29 February 2024. Exceeded emission limit of HCl on 17, 18, 22, 23, 24, 25, 26, 27, 28, and 29 December 2023; 15, 16, 23, 24, 25, 26, 27, 28, 29, and

Non-compliance of emission limits of NO_x , SO_2 , and HCl from CHP1; NO_x and SO_2 from CHP2; and NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during December 2023. The exceedances of NO_x , SO_2 , and HCl from CHPs as well as the exceedances of NO_x , SO_2 , NH_3 , and HCl from the ASP occurred due to system instability.

30 January 2024.

Non-compliance of emission limits of Odour from CAPCS; NO_x , SO_2 , and HCl from CHP1; NO_x and SO_2 from CHP2; NO_x and SO_2 from CHP3; and NO_x , SO_2 , NH_3 , and HCl from the ASP were recorded during January 2024. The exceedances of Odour from the CAPCS; NO_x , SO_2 , and HCl from the CHPs; and the exceedances of NO_x , SO_2 , NH_3 , and HCl from the ASP occurred due to system instability.

Non-compliance of emission limits of Odour from CAPCS; NO_x and SO_2 from CHP1; NO_x and SO_2 from CHP3; and NO_x , SO_2 , and NH_3 from the ASP were recorded during February 2024. The exceedances of Odour from the CAPCS; NO_x and SO_2 , from the CHPs; and the exceedances of NO_x , SO_2 , and NH_3 from the ASP occurred due to system instability.

All analytes from the outlet chamber of the effluent storage tank were recorded to be in compliance with discharge limits during the reporting period.

During the reporting period, both Petrol Interceptor 1 and Petrol Interceptor 2 were recorded to be in compliance with discharge limits.

The environmental control /mitigation measures related to air quality, water quality, waste (including land contamination prevention), hazard-to-life and landscape and visual recommended in the approved EIA Report and the EM&A Manual were properly implemented by the Contractor during the reporting period.

Monthly landscape and visual monitoring were conducted in the reporting period. The necessary landscape and visual mitigation measures recommended in the approved EIA Report were generally implemented by the Contractor.

Five (5) Environmental Complaints regarding odour nuisance were received at the facility on 19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February

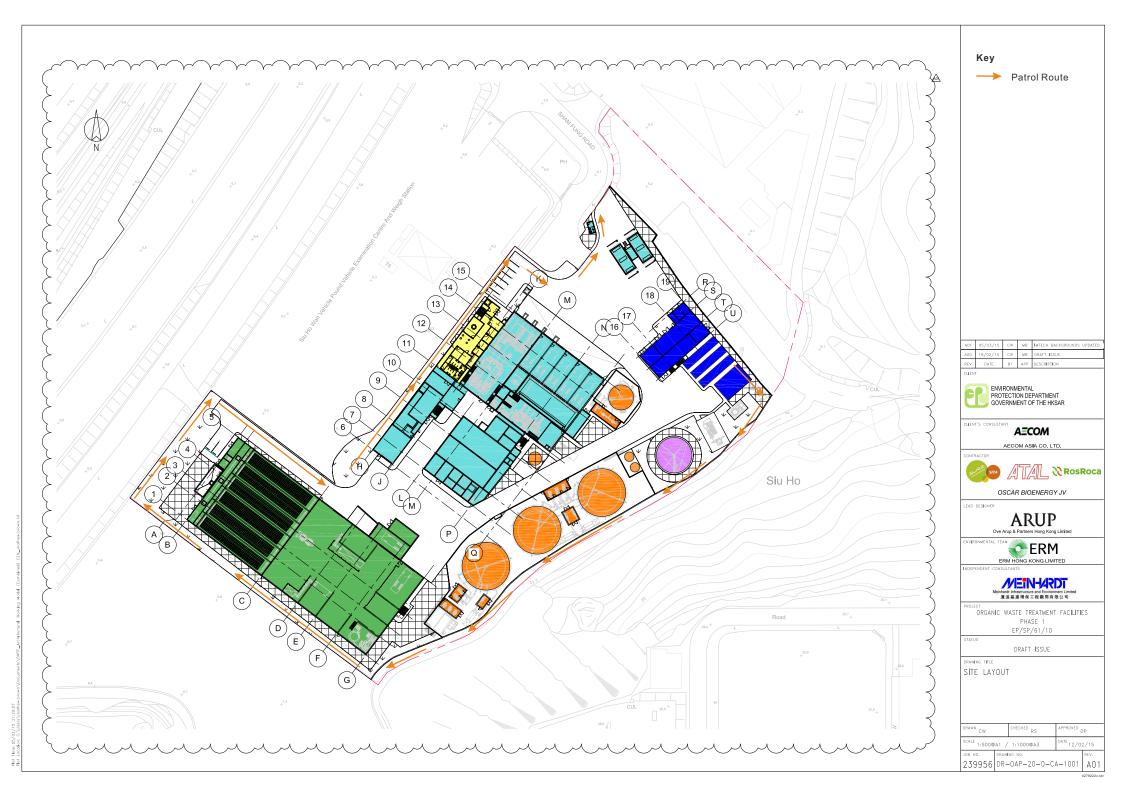


2024. Mitigation measures were implemented, daily odour patrols were arranged, and interim reports regarding the complaints received were submitted to EPD on 3 March 2024 and 8 March 2024. The full investigation reports of the Environmental Complaints are presented in $Annex\ F$.





ANNEX A PROJECT LAYOUT

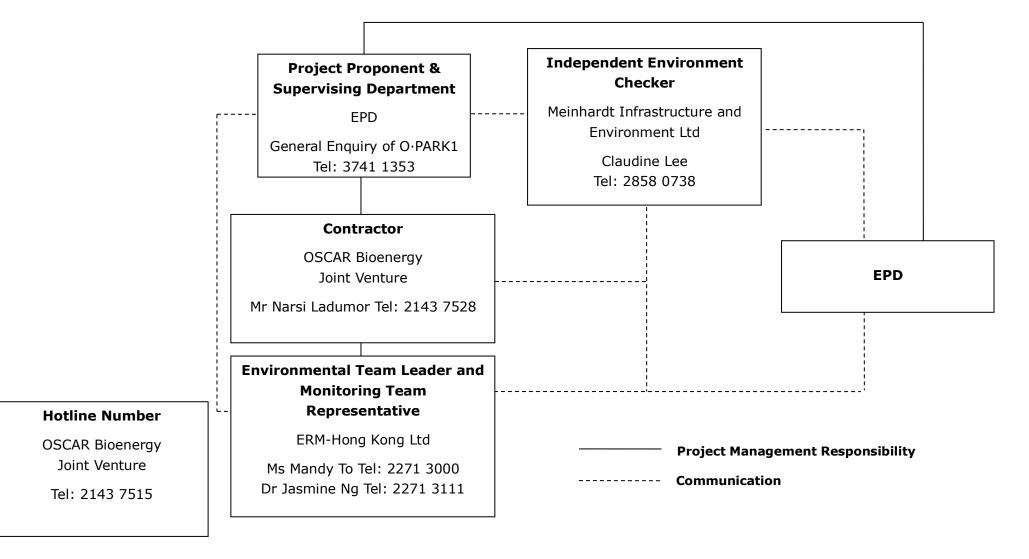




ANNEX B

PROJECT ORGANISATION CHART AND CONTACT DETAIL

PROJECT ORGANISATION (WITH CONTACT DETAILS)





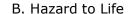


ANNEX C

IMPLEMENTATION SCHEDULE OF MITIGATION MEASURES

SUMMARY OF MITIGATION MEASURES IMPLEMENTATION SCHEDULE FOR OPERATION PHASE

EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		Summary of Environmental Mitigation Measures in the EIA and EM&A N	Manual	
		A. Air Quality		
3.78 2.7 & 2.13 - 2.19		 Air Pollution Control (Construction Dust) Regulation & Good Site Practices Commissioning tests shall be conducted to confirm the centralized air pollution control unit, the cogen units, the standby flaring unit and ASP against the design emission levels as stated in Tables 2.2 - 2.5. Odour monitoring shall be conducted at the stack exhaust of the centralized air pollution control unit weekly in the first month of the commissioning stage. 	OWTF Stacks/ During Commissioning Stage	√
3.78	2.7-2.12	Air Pollution Control and Stack Monitoring • Stack monitoring shall be installed for the centralized air pollution control unit, cogen units and ASP of OWTF to ensure that the air emissions from OWTF would meet the design emission limits as well as EPD criteria.	During Operation	√
3.78 2.20- 2.28		Odour Patrol at site boundary of OWTF	OWTF Site Boundary/During Operation (The need to continue the odour patrol after the end of the 2-year monitoring period would depend on the monitoring results and should be agreed with EPD)	N/A





EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
4.103	3.4	 Operation Phase 3m high fence should be constructed along the boundary facing the SHWWTW Emergency evacuation procedures should be formulated and the Contractor should ensure on site staff should be familiar with these procedures. Diagram showing the escape routes to a safe place should be posted in the site notice boards and at the entrance/exit of site. A copy of the latest version emergency procedures should be dispatched to Tung Chung Fire Station for reference once available. The emergency procedures should specify means of providing a rapid and direct warning (e.g. Siren and Flashing Light) to personnel on site in the event of chlorine gas release in the SHWWTW. The Contractor should establish a communication channel with the SHWWTW operation personnel and FSD. In case of any hazardous incidents in the treatment works, operation personnel of SHWWTW should advise the Contractor to inform personnel on site to proceed with emergency procedure. The Contractor should appoint a Liaison Officer to communicate with FSD Incident Commander on site in case of emergency. Periodic drills should be coordinated and conducted to ensure all on site personnel are familiar with the emergency procedures. Upon completion of the drills, a review on every step taken should be conducted to identify area of improvement. Prior notice of periodic drills should be given to Station Commander of Tung Chung Fire Station. Joint operational exercise with FSD and SHWWTW is recommended. 	Work Site / During Operation Period	
		C. Water Quality		
5.44 4.5		Wastewater from Organic Waste Treatment Process The Project site will be equipped with an adequately sized wastewater treatment plant. A high rate type of active sludge system specifically designed for the removal of nitrogen components from the wastewater in combination with conversion of residual BOD and COD would be deployed. The wastewater treatment plant would also be incorporated with SHARON or	Work Site / During Design & Operation Period	✓



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		annamox technology or equivalent to achieve high total overall nitrogen removal. Wastewater generated from the OWTF (including wastewater from dewatering process, leachate from waste reception area, condensate from biogas handling, wastewater from scrubber of air treatment system and any surplus water from truck washing facility) will be diverted to the wastewater treatment plant. Treated effluent will then be stored temporarily in order to be used as process water within the plants. The storage volume would be around 20 m3. Overflow from the tank will be discharged to foul sewers. The polluting parameters in effluent shall be in compliance with the requirements specified in the TM- DSS. The design, installation and operation of the wastewater treatment plant shall be licensed under the Waste Disposal Ordinance and subject to the effluent monitoring as required under the WPCO which is under the ambit of regional office (RO) of EPD. To ensure that wastewater can be adequately treated and effluent from treatment plant can meet the standards listed in TM- DSS, the following mitigation measure should be conducted. • Cleaning and maintenance of treatment facilities should be conducted on a regular basis to ensure that removal rate of each treatment facility would not be reduced. • Cleaning and maintenance of pipelines should be carried out on a regular basis to prevent block of pipeline and leaching of wastewater, and therefore prevent overflowed or leached wastewater discharging into nearby drainages and water streams. • Regular site inspection should be conducted to ensure that no wastewater can be directly discharged into nearby water streams.		
5.55	4.5	In the scrubber, spraying water should be re-circulated to minimize the need for external water. The spraying water would be collected at the bottom of the scrubber. Excess water would be discharged to the wastewater treatment plant as described in Section 5.54.	Work Site / During Design & Operation Period	√
5.56	4.5	The waste reception, treatment facilities and compost storages of OWTF should be located in enclosed buildings to prevent generation of contaminated rain runoff. All surface runoff such as washed water generated in the treatment	Work Site / During Design & Operation Period	√



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		processes areas should be properly collected and diverted to the on-site wastewater treatment plant as described in Section 5.54.		
5.57	4.5	All drainage system for collection and transferring wastewater generated in the OWTF to the on-site wastewater treatment plant as described in Section 5.54 should be capable of preventing clogging and easy maintenance and cleaning.	Work Site / During Design & Operation Period	√
		D. Waste Management		
6.50	5.12	Good Site Practices	During Operation Period	√
		Good operational practices should be adopted to Minimize waste management impacts:		
		• Obtain the necessary waste disposal permits from the appropriate authorities, in accordance with the Waste Disposal Ordinance (Cap. 354), Waste Disposal (Chemical Waste) (General) Regulation and the Land (Miscellaneous Provision) Ordinance (Cap. 28);		
		 Nomination of an approved person to be responsible for good site practice, arrangements for collection and effective disposal to an appropriate facility of all wastes generated at the site; 		
		Use of a waste hauler licensed to collect specific category of waste;		
		• A trip-ticket system should be included as one of the contractual requirements and implemented by the Environmental Team to monitor the disposal of solid wastes at public filling facilities and landfills, and to control fly tipping. Reference should be made to ETWB TCW No. 31/2004.		
		• Training of site personnel in proper waste management and chemical waste handling procedures;		
		• Separation of chemical wastes for special handling and appropriate treatment at a licensed facility;		



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		Routine cleaning and maintenance programme for drainage systems, sumps and oil interceptors;		
		Provision of sufficient waste disposal points and regular collection for disposal;		
		• Adoption of appropriate measures to minimize windblown litter and dust during transportation of waste, such as covering trucks or transporting wastes in enclosed containers; and		
		• Implementation of a recording system for the amount of wastes generated, recycled and disposed of (including the disposal sites).		
6.51	5.13	Waste Reduction Measures	During Operation Period	√
		Good management and control can prevent the generation of significant amounts of waste. It is recommended that the following good operational practices should be adopted to ensure waste reduction:		
		• Segregation and storage of different types of waste in different containers, skips or stockpiles to enhance reuse or recycling of materials and their proper disposal;		
		• Encourage collection of aluminum cans, plastic bottles and packaging material (e.g. carton boxes) and office paper by individual collectors. Separate labelled bins should be provided to help segregate this waste from other general refuse generated by the work force; and		
		Any unused chemicals or those with remaining functional capacity should be reused as far as practicable.		
6.52	5.14	Wastes Generated from Pre-Treatment Process	Pre-Treatment Process/	√
		Wastes generated from pre-treatment process should be recycled as far as possible. Wastes generated from pre- treatment process should also be separated from any chemical waste and stored in covered skips. The recyclables should be collected by licensed collectors, while the rest of the	During Operation Period	



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		waste should be removed from the site on a daily basis to minimize odour, pest and litter impacts. Open burning must be strictly prohibited.		
6.53-6.56	5.15-5.18	 Chemical Wastes Chemical waste generated from machinery maintenance and servicing should be managed in accordance with Code of Practice on the Packaging, Labelling and storage of Chemical Wastes under the provisions of Waste Disposal (Chemical Waste) (General) Regulation. The chemical waste should be collected by drum-type containers and removed by licensed chemical waste contractors. Plant / equipment maintenance schedules should be planned in order to minimize the generation of chemical waste. Non-recyclable chemical wastes and lubricants should be disposed of at appropriate facilities, such as CWTC. Copies or counterfoils from collection receipts issued by the licensed waste collector should be kept for recording purpose. Recyclable chemical waste will be transported off-site for treatment by a licensed collector. The Contractor will need to register with EPD as a chemical waste producer. Where possible, chemical wastes (e.g. waste lubricants) would be recycled at appropriate facilities, such as Dunwell's oil re-refinery. 	Whole Site / During Operation Period	√
6.57-6.58	5.19-5.20	 General Refuse Waste generated in offices should be reduced through segregation and collection of recyclables. To promote the recycling of wastes such as used paper, aluminum cans and plastic bottles, it is recommended that recycling bins should be clearly labelled and placed at locations with easy access. For the collection of recyclable materials, they should be collected by licensed collectors. General refuse, other than segregated recyclable wastes, should be separated from any chemical waste and stored in covered skips. The general refuse should be removed from the site on a daily basis to minimize odour, pest and litter impacts. Also, open burning of refuse must be strictly prohibited. 	Whole Site / During Operation Period	√



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		E. Proposed Land Contamination Preventive Measures		
6.65	5.21 (i)	 Fuel Oil Containers Fuel oil should be stored in suitable containers. All fuel oil containers should be securely closed. Appropriate labels showing the name of fuel oil should be posted on the containers. Drip trays should be provided for all containers. 	Fuel Oil Storage Containers /During Operation Period	√
6.65	5.21 (ii)	 Storage Area Distance between the fuel oil refueling points and the fuel oil containers should be minimized. The storage area should be used for fuel oil storage only. No surface water drains or foul sewers should be connected to the storage area. The storage area should be enclosed by three sides by a wall and have an impermeable floor or surface. 	Fuel Oil Storage Area /During Operation Period	√
6.65	5.21 (iii)	Fuel Oil Spillage Response An Oil Spill Response Plan should be prepared by the operator to document the appropriate response procedures for oil spillage incident in detail. General procedures to be taken in case of fuel oil spillage are presented below. • Training Training on oil spill response actions should be given to relevant staff. The training should cover the followings: - Tools & resources to combat oil spillage and fire, e.g. locations of oil spill handling equipment and firefighting equipment; - General methods to deal with oil spillage and fire incidents; - Procedures for emergency drills in the event of oil spills and fire; and - Regular drills should be carried out. • Communication Establish communication channel with the Fire Services Department (FSD) and EPD to report any oil spillage incident so that necessary	Whole Site / During Operation Phase	√



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		assistance from relevant department could be quickly sought. • Response Procedure Any fuel oil spillage within the Project Site should be immediately reported to the Site Manager with necessary details including location, source, possible cause and extent of the spillage Site Manager should immediately attend to the spillage and initiate any appropriate action to confine and clean up the spillage. The response procedures should include the following: - Identify and isolate the source of spillage as soon as possible. - Contain the oil spillage and avoid infiltration into soil / groundwater and discharge to storm water channels. - Remove the oil spillage. - Clean up the contaminated area. - If the oil spillage occurs during refueling, the refueling operation should immediately be stopped. Recovered contaminated fuel oil and the associated material to remove the spilled oil should be considered as chemical waste. The handling and disposal procedures for chemical wastes are discussed in the following paragraphs.		
6.66	5.22 (i)	 Chemicals and Chemical Wastes Handling & Storage Chemicals and chemical wastes should only be stored in suitable containers in purpose-built areas. The storage of chemical wastes should comply with the requirements of the Code of Practice on the Packaging, Labelling and Storage of Chemical Wastes. The storage areas for chemicals and chemical wastes should have an impermeable floor or surface. The impermeable floor I surface should possess the following properties: Not liable to chemically react with the materials and their containers to be stored. Able to withstand normal loading and physical damage caused by container handling The integrity and condition of the impermeable floor or surface should be inspected at regular intervals to ensure that it is 	Whole Site / During Operation Period	✓



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status	
		 satisfactorily maintained For liquid chemicals and chemical wastes storage, the storage area should be bonded to contain at least 110% of the storage capacity of the largest containers or 20% of the total quantity of the chemicals/chemical wastes stored, whichever is the greater. Storage container should be checked at regular intervals for their structural integrity and to ensure that the caps or fill points are tightly closed. Chemical handling should be conducted by trained workers under supervision. 			
6.66	5.22 (ii)	Chemicals and Chemical Wastes Spillage Response A Chemicals and / or Chemical Wastes Spillage Response Plan should be prepared by the operator to document in detail the appropriate response procedures for chemicals or chemical wastes spillage incidents. General procedures to be undertaken in case of chemicals I chemical waste spillages are presented below: • Training • Training on spill response actions should be given to relevant staff. The training should cover the followings: • Tools & resources to handle spillage, e.g. locations of spill handling equipment; • General methods to deal with spillage; and • Procedures for emergency drills in the event of spills. • Communication Establish communication channel with Fire Services Department (FSD) and EPD to report the spillage incident so that necessary assistance from relevant department could be quickly sought. • Response Procedures Any spillage within OWTF site should be reported to the Site Manager. Site Manager shall attend to the spillage and initiate any appropriate actions needed to confine and clean up the spillage. The response procedures should include the followings: • Identify and isolate the source of spillage as soon as possible; • Contain the spillage and avoid infiltration into soil / groundwater and discharge to storm water channels (in case the	Whole Site / During Operation Period	√	



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status
		spillage occurs at locations out of the designated storage areas); - Remove the spillage; the removal method / procedures documented in the Material Safety Data Sheet (MSDS) of the chemicals spilled should be observed; - Clean up the contaminated area (in case the spillage occurs at locations out of the designated storage areas); and - The waste arising from the cleanup operation should be considered as chemical wastes.		
6.67 - 6.69	5.23- 5.25	 After any spillage, an incident report should be prepared by the Site Manager. The incident report should contain details of the incident including the cause of the incident, the material spilled and estimated spillage amount, and also the response actions undertaken. The incident record should be kept carefully and able to be retrieved when necessary. The incident report should provide sufficient details for the evaluation of any environmental impacts due to the spillage and assessment of the effectiveness of measures taken. In case any spillage or accidents results in significant land contamination, EPD should be informed immediately and the Project operator should be responsible for the cleanup of the affected area. The responses procedures described in Sections 6.65 - 6.66 of the EIA Report should be followed accordingly together with the land contamination assessment and remediation guidelines stipulated in the Guidance Manual for Use of Risk-based Remediation Goals for Contaminated Land Management and the Guidance Note for Contaminated Land Assessment and Remediation. 	Whole Site / During Operation Period	✓
6.65	5.21 (i)	Fuel Oil Containers • Fuel oil should be stored in suitable containers. • All fuel oil containers should be securely closed. • Appropriate labels showing the name of fuel oil should be posted on the containers.	Fuel Oil Storage Containers /During Operation Period	√



EIA Ref.	EM&A Log Ref.	Environmental Protection Measures	Location/Timing	Status	
		Drip trays should be provided for all containers.			
		F. Landscape and Visual			
7.98 & Table 7.8	Table 6.2	 Operation Phase Aesthetic design of the facade, including its colour theme, pattern, texture, materials, finishing and associated structures to harmonize with the surrounding settings Grass / groundcover planting to soften the roof Heavy standard tree planting to screen proposed associated structures Grasscrete paving to soften the harshness of large paved surface areas wherever possible 	Within Project Area / During Design & Operation Stages	√	

Remarks:

- √ Compliance of Mitigation Measures
- <> Compliance of Mitigation but needs improvement
- x Non-compliance of Mitigation Measures
- ▲ Non-compliance of Mitigation Measures but rectified by OSCAR Bioenergy JV
- \square Deficiency of Mitigation Measures but rectified by OSCAR Bioenergy JV
- N/A Not Applicable in Reporting Period





ANNEX D WASTE FLOW TABLE

MONTHLY SUMMARY WASTE FLOW TABLE

		Waste Generated from Pre-treatment Process			General Refuse								
Month	Chemical Waste	Disposed of at Landfill ¹	Metals ²	Paper / cardboard packaging ²	Plastics ³	Dispose Landfi		Metal	s ²	Paper / car packagi		Plastic	c s ³
	Litre	tonne	tonne	tonne	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne
March 2019	1,200	477.08	0	0	0	26	1.50	0	0	0	0	0	0
April 2019	0	455.60	0	0	0	22	1.27	0	0	0	0	0	0
May 2019	1,000	528.22	0	0	0	25	2.88	0	0	0	0	1	0.39
June 2019	0	459.23	0	0	0	24	2.76	0	0	0	0	0	0
July 2019	0	521.79	0	0	0	26	3.00	0	0	0	0	0	0
August 2019	40	441.05	0	0	0	27	3.11	0	0	0	0	0	0
September 2019	1,800	576.28	0	0	0	24	2.76	0	0	0	0	0	0
October 2019	0	441.22	0	0	0	25	2.88	0	0	0	0	0	0
November 2019	1,600	451.57	0	0	0	26	3.00	0	0	0	0	0	0
December 2019	1,009	488.13	0	0	0	24	2.76	0	0	0	0	0	0
January 2020	0	388.20	0	0	0	23	2.65	0	0	0	0	0	0



		Waste Gen	erated from	Pre-treatment	Process				Genera	l Refuse			
Month	Chemical Waste	Disposed of at Landfill ¹	Metals ²	Paper / cardboard packaging ²	Plastics ³	Dispose Landf		Metal	s ²	Paper / cai packagi		Plastic	cs ³
	Litre	tonne	tonne	tonne	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne
February 2020	4,525	372.97	0	0	0	24	2.76	0	0	0	0	0	0
March 2020	1,200	351.71	0	0	0	27	3.11	0	0	0	0	0	0
April 2020	0	363.92	0	0	0	21	2.42	0	0	0	0	0	0
May 2020	800	294.36	0	0	0	25	2.88	0	0	0	0	0	0
June 2020	0	347.23	0	0	0	25	2.88	0	0	0	0	0	0
July 2020	200	852.07	0	0	0	26	3.00	0	0	0	0	0	0
August 2020	0	700.25	0	1.20	0	25	2.88	0	0	0	0	0	0
September 2020	400	579.64	0	5.31	0	26	3.00	0	0	0	0	0	0
October 2020	0	840.75	0	5.83	0	24	2.76	0	0	0	0	0	0
November 2020	0	688.20	0	0.80	0	25	2.88	0	0	0	0	0	0
December 2020	766	685.47	0	0	0	25	2.88	0	0	0	0	0	0
January 2021	1,800	634.00	0	0	0	25	2.88	0	0	0	0	0	0
February 2021	6,120	377.72	0	0	0	21	2.42	0	0	0	0	0	0



		Waste Gen	erated from	Pre-treatment	Process				Genera	Refuse			
Month	Chemical Waste	Disposed of at Landfill ¹	Metals ²	Paper / cardboard packaging ²	Plastics ³	Dispose Landf		Metal	s ²	Paper / car packagi		Plasti	cs ³
	Litre	tonne	tonne	tonne	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne
March 2021	6,000	325.21	0	0	0	27	3.11	0	0	0	0	0	0
April 2021	9,700	651.29	0	0	0	22	2.53	0	0	0	0	0	0.00
May 2021	4,000	671.03	0	0	0	24	2.76	0	0	0	0	0	0.00
June 2021	0	558.72	0	0	0	25	2.88	0	0	0	0	0	0.00
July 2021	0	382.74	0	0	0	26	3.00	0	0	0	0	0	0.00
August 2021	3,420	687.05	0	0	0	26	3.00	0	0	0	0	0	0.00
September 2021	2,400	304.01	0	0	0	25	2.88	0	0	0	0	0	0.00
October 2021	0	342.38	0	0	0	23	2.65	0	0	0	0	0	0.00
November 2021	2,000	394.26	0	0	0	26	3.00	0	0	0	0	0	0.00
December 2021	0	392.44	0	0.67	0	22	2.53	0	0	0	0	0	0.00
January 2022	0	359.27	0	0	0	23	2.65	0	0	0	0	0	0.00
February 2022	0	260.57	0	0	0.00	21	2.42	0	0	0	0	0	0.00
March 2022	0	253.75	0	0	0.00	23	2.65	0	0	0	0	0	0.00



		Waste Gen	erated from	Pre-treatment	Process				General	Refuse			
Month	Chemical Waste	Disposed of at Landfill ¹	Metals ²	Paper / cardboard packaging ²	Plastics ³	Dispose Landfi		Metal	s ²	Paper / car packagi		Plastic	cs ³
	Litre	tonne	tonne	tonne	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne
April 2022	1,240	253.45	0	0	0.00	22	2.53	0	0	0	0	0	0.00
May 2022	0	354.94	0	0	0.00	24	2.76	0	0	0	0	0	0.00
June 2022	0	383.41	1.73	0.08	0.00	25	2.88	0	0	0	0	0	0.00
July 2022	0	430.90	4.87	1.15	0.00	24	2.76	0	0	0	0	0	0.00
August 2022	1,000	427.52	0	0	0.00	23	2.65	0	0	0	0	0	0.00
September 2022	0	476.92	0	0	0.00	21	2.419	0	0	0	0	0	0.000
October 2022	0	615.87	0	0	0.00	24	2.765	0	0	0	0	0	0.000
November 2022	0	585.38	0	0	0.00	26	2.995	1	0.020	1	0.035	1	0.020
December 2022	0	666.42	0	0	0.00	31	3.571	1	0.001	1	0.040	1	0.050
January 2023	1,200	581.55	0.969	0.000	0.021	23	2.650	0	0.000	1	0.004	0	0.000
February 2023	5,540	643.75	0.000	0.360	0.000	24	2.765	1	0.003	0	0.000	1	0.015
March 2023	0	682.00	0.000	0.000	0.000	27	3.110	2	0.011	2	0.065	2	0.012
April 2023	0	579.34	0.260	0.000	0.000	21	2.419	0	0.000	1	0.015	1	0.012



		Waste Gen	erated from	Pre-treatment	Process				General	Refuse			
Month	Chemical Waste	Disposed of at Landfill ¹	Metals ²	Paper / cardboard packaging ²	Plastics ³	Dispose Landf		Metal	s ²	Paper / cai packagi		Plasti	cs ³
	Litre	tonne	tonne	tonne	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne
May 2023	0	682.27	0.000	0.000	0.000	25	2.88	0	0.000	0	0.000	2	0.130
June 2023	1,000	653.92	0.000	0.040	0.000	25	2.880	1	0.015	1	0.060	1	0.035
July 2023	0	713.68	0.000	0.000	0.000	24	2.765	0	0.000	2	0.080	1	0.005
August 2023	0	677.43	0.000	0.000	0.000	27	3.110	2	0.015	2	0.090	2	0.025
September 2023	4,459	721.42	0.000	1.250	0.000	23	2.650	2	0.010	0	0.000	2	0.006
October 2023	0	919.56	0.000	0.000	0.000	23	2.650	2	0.006	2	0.022	2	0.020
November 2023	1,440	1,016.43	0.000	0.000	0.000	26	2.995	0	0.000	1	0.100	0	0.000
December 2023	0	1,006.03	0.000	0.000	0.000	24	2.765	1	0.001	2	0.009	2	0.006
January 2024	1,200	830.42	0.000	0.000	0.000	26	2.995	1	0.006	2	0.100	1	0.020
February 2024	400	901.23	0.000	0.000	0.000	22	2.534	1	0.005	2	0.090	1	0.010
Total	67,459.00	32,682.14	7.83	16.69	0.02	1464	165.89	15	0.093	20	0.710	21	0.756

Notes:

1. General refuse was disposed of at NENT by subcontractors.



- 2. Metal and paper/cardboard packaging were collected by recycler for recycling.
- 3. Plastics refer to plastic bottles/containers, plastic sheets/foam from packaging material collected by recycler for recycling.
- 4. It was assumed that four 240-litre bins filled with 80% of general refuse were collected at each collection. The general refuse density was assumed to be around 0.15 kg/L.





ANNEX E

ENVIRONMENTAL COMPLAINT, ENVIRONMENTAL SUMMONS AND PROSECUTION LOG

CUMULATIVE ENVIRONMENTAL COMPLAINT, ENVIRONMENTAL SUMMONS AND PROSECUTION LOG

Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
May 2015	0	0
June 2015	0	0
July 2015	0	0
August 2015	0	0
September 2015	0	0
October 2015	0	0
November 2015	0	0
December 2015	0	0
January 2016	0	0
February 2016	0	0
March 2016	0	0
April 2016	0	0
May 2016	0	0



Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
June 2016	0	0
July 2016	0	0
August 2016	0	0
September 2016	0	0
October 2016	0	0
November 2016	0	0
December 2016	0	0
January 2017	0	0
February 2017	0	0
March 2017	0	0
April 2017	0	0
May 2017	0	0
June 2017	0	0
July 2017	0	0
August 2017	0	0
		I .



Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
September 2017	0	0
October 2017	0	0
November 2017	0	0
December 2017	0	0
January 2018	0	0
February 2018	0	0
March 2018	0	0
April 2018	0	0
May 2018	0	0
June 2018	0	0
July 2018	0	0
August 2018	0	0
September 2018	1	0
October 2018	0	0
November 2018	0	0



Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0



Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
March 2020	0	0
April 2020	0	0
May 2020	0	0
June 2020	0	0
July 2020	0	0
August 2020	0	0
September 2020	0	0
October 2020	0	0
November 2020	0	0
December 2020	0	0
January 2021	0	0
February 2021	0	0
March 2021	0	0
April 2021	0	0
May 2021	0	0



Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
June 2021	0	0
July 2021	0	0
August 2021	0	0
September 2021	0	0
October 2021	0	0
November 2021	0	0
December 2021	0	0
January 2022	0	0
February 2022	0	0
March 2022	0	0
April 2022	0	0
May 2022	0	0
June 2022	0	0
July 2022	0	0
August 2022	0	0
	I .	I .



Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
September 2022	0	0
October 2022	0	0
November 2022	0	0
December 2022	0	0
January 2023	0	0
February 2023	0	0
March 2023	0	0
April 2023	0	0
May 2023	0	0
June 2023	0	0
July 2023	0	0
August 2023	0	0
September 2023	0	0
October 2023	0	0
November 2023	0	0



Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
December 2023	0	0
January 2024	0	0
February 2024	5	0
Overall Total	6	0



ANNEX F INVESTIGATION REPORT

Investigation Report of CEMS Exceedances		
Date	1 – 31 December 2023	
Time	Continuous Monitoring throughout December 2023	
Monitoring Location	Continuous Environmental Monitoring Systems (CEMS)	
Parameter	Various emission parameters of Cogeneration Units (CHPs) and Ammonia Stripping Plant (ASP)	
Exceedance Description	 Continuous monitoring was carried out at the CAPCS, CHP and ASP throughout the reporting period using the CEMS. According to the EM&A Manual, exceedance is considered if the emission concentration of the concerned pollutants is higher than the emission limits stated in Tables 2.2, 2.3 and 2.5 of the EM&A Manual (Version F) for CAPCS, CHPs and ASP respectively. The concentrations of the concerned air pollutants were monitored on-line by the CEMS. Exceedances of various emission parameters were recorded on the CEMS including: NO_x, SO₂, and HCl from CHP1; NO_x and SO₂ from CHP2; and NO_x, SO₂, NH₃, and HCl from ASP. The Contractor has investigated the cause of the exceedances and identified that: 	
	 The exceedances of NO_x, SO₂, and HCl from the CHPs, as well as the exceedances of NO_x, SO₂, NH₃, and HCl from ASP occurred due to system instability. 	
Action Taken / Action to be Taken	The Contractor investigated the reason for the exceedances and arranged Remedial Works and Follow-up Actions (see below).	
Remedial Works and Follow-up Actions	The Contractor had arranged the CHP supplier to inspect, analyse and improve CHP and ASP performance in January 2024 based on final reports of the quality assurance level 2 test (QAL) for the CEMS calibration. This QAL2 evaluation is still ongoing, and improvement recommendation will be provided once the final report is received.	

Prepared by: Alex Khawaja Waheed, MT Representative

10 January 2024 Date



Investigation Report of CEMS Exceedances		
Date	1 - 31 January 2024	
Time	Continuous Monitoring throughout January 2024	
Monitoring Location	Continuous Environmental Monitoring Systems (CEMS)	
Parameter	Various emission parameters of the Centralised Air Pollution Control Unit (CAPCS), Cogeneration Units (CHPs), and Ammonia Stripping Plant (ASP)	
Exceedance Description	1. Continuous monitoring was carried out at the CAPCS, CHPs, and ASP throughout the reporting period using the CEMS. According to the EM&A Manual, an exceedance is considered if the emission concentration of the concerned pollutants is higher than the emission limits stated in Tables 2.2, 2.3 and 2.5 of the EM&A Manual (Version F) for the CAPCS, CHPs, and ASP respectively. The concentrations of the concerned air pollutants were monitored on-line by the CEMS. Exceedances of various emission parameters were recorded on the CEMS including:	
	Odour from CAPCS;	
	NO _x , SO ₂ , and HCl from CHP1;	
	 NO_x and SO₂ from CHP2; 	
	• NO _x and SO ₂ from CHP3; and	
	• NO _x , SO ₂ , NH ₃ , and HCl from ASP.	
	2. The Contractor has investigated the cause of the exceedances and identified that:	
	 The exceedances of Odour from CAPCS; NO_x, SO₂, and HCl from the CHPs; and the exceedances of NO_x, SO₂, NH₃, and HCl from ASP occurred due to system instability. 	
	 Regarding the NO_x exceedances from the CHPs, The CHP manufacturer engineer from Germany visited the ORRC1 facility in late 2023 and also began working on the study of a way to improve the emission performance of the engines. Improvement on NO_x emissions was obtained when the engines were running at optimum loading. Due to the CHPs running at lower than the suggested 85% to 90% under the current operational conditions, the NO_x values will exceed the emission limit from time to time. In addition, the exceedances also occur during the frequent starting and stopping of the equipment. During the initial startup period, the emissions tend to be higher until the engine stabilises. The Contractor will continue to communicate with the manufacturer to follow-up. 	
	 Regarding the SO₂ exceedances from the CHPs, a quality assurance level 2 test (QAL2) was completed by a third-party laboratory that showed lower SO₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. The MT and IEC have reviewed the proposal and have no objections. This correction factor is planned to be implemented after finalising the arrangement with the environmental team and project proponent. 	
	 The various exceedances from the ASP can be attributed to several items: unstable operation of the system (due to various faults) that results in 	



Investigation Report of CEMS Exceedances		
	frequent starting and stopping of the system and unstable process conditions during operation. The Contractor would like to work with Organics to run a performance test to optimise the system both for treatment efficiency and emissions control. There has been frequent downtime, as well as solids issues on the ASP over the past year, making the operation of the system unstable.	
Action Taken / Action to be Taken	The Contractor investigated the reason for the exceedances and arranged Remedial Works and Follow-up Actions (see below).	
Remedial Works and Follow-up Actions	The Contractor had arranged the CHP supplier to inspect, analyse and improve CAPCS, CHP, and ASP performance in February 2024 based on final reports of the quality assurance level 2 test (QAL2) for the CEMS calibration. This QAL2 evaluation is still ongoing, and improvement recommendation will be provided once the final report is received in order to address the various SO_2 exceedances from the CHPs and the ASP.	
	Additionally, the Contractor is working with the Manufacturer to rectify the low temperature issue on some of the cylinder heads of the engines, which will allow the CHPs to run at higher loads and should lead to lower NO_x emissions.	
	To address the various exceedances from the ASP, the Contractor will conduct an overhaul of the ASP at the end of March 2024 to increase reliability. In addition, a drum screen is targeted to be installed by the end of February/early March 2024 to decrease the solids entering the ASP in order to improve the efficiency and reliability of the system.	

Prepared by: Alex Khawaja Waheed, MT Representative

Date 8 February 2024



Investigation Report of CEMS Exceedances		
Date	1 – 29 February 2024	
Time	Continuous Monitoring throughout February 2024	
Monitoring Location	Continuous Environmental Monitoring Systems (CEMS)	
Parameter	Various emission parameters of the Centralised Air Pollution Control Unit (CAPCS), Cogeneration Units (CHPs), and Ammonia Stripping Plant (ASP)	
Exceedance Description	1. Continuous monitoring was carried out at the CAPCS, CHPs, and ASP throughout the reporting period using the CEMS. According to the EM&A Manual, an exceedance is considered if the emission concentration of the concerned pollutants is higher than the emission limits stated in Tables 2.2, 2.3 and 2.5 of the EM&A Manual (Version F) for the CAPCS, CHPs, and ASP respectively. The concentrations of the concerned air pollutants were monitored on-line by the CEMS. Exceedances of various emission parameters were recorded on the CEMS including:	
	Odour from CAPCS;	
	• NO _x and SO₂ from CHP1;	
	• NO _x and SO ₂ from CHP2;	
	• NO _x and SO ₂ from CHP3; and	
	• NO _x , SO ₂ , and NH ₃ from ASP.	
	The Contractor has investigated the cause of the exceedances and identified that:	
	 The exceedances of Odour from CAPCS; NO_x and SO₂ from the CHPs; and the exceedances of NO_x, SO₂, and NH₃ from ASP occurred due to system instability. 	
	 Regarding the exceedances of Odour from the CAPCS, the Contractor has identified that a faulty sensor for H₂S may be the source of the problem, as the Total Odour value is calculated based on the sensor readings for H₂S and NH₃ for the CAPCS. 	
	ullet Regarding the NO _x exceedances from CHP1, the Contractor has identified that the Co-gen unit may have been burning lubrication oil, which caused many of the exceedances.	
	$ \bullet \text{Regarding the NO}_x \text{ exceedances from CHP2, the Contractor has identified that the exceedances may be attributed to the frequent stopping/ starting of the system. } \\$	
	$ \hbox{\bf Regarding the NO}_x \hbox{\bf exceedances from CHP3, the Contractor has identified that the exceedances may be reduced by overhauling the CHP3. } $	
	• Regarding the SO ₂ exceedances from the CHPs, a quality assurance level 2 test (QAL2) was completed by a third-party laboratory that showed lower SO ₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. The MT and IEC have reviewed the proposal and have no objections after the Contractor has addressed all comments.	
	The various exceedances from the ASP can be attributed to two items: a CEMS sensor issue has caused abnormal readings in ASP emissions during	



Investigation Report of CEMS Exceedances		
	the past few months. Additionally, the frequent starting and stopping of the system has been causing unstable process conditions during operation.	
Action Taken / Action to be Taken	The Contractor investigated the reason for the exceedances and arranged Remedial Works and Follow-up Actions (see below).	
Remedial Works and Follow-up Actions	The following Remedial Works and Follow-up Actions have been / shall be implemented by the Contractor to address the above exceedances:	
	 To address the exceedances of Odour from the CAPCS, the Contractor has ordered a new H₂S sensor to replace the faulty one and will be installed as soon as practicable. 	
	• To address the NO_x exceedances from CHP1, the Contractor has ordered a spare part cylinder from the supplier to resolve the lubrication oil issue and will be installed as soon as practicable.	
	 To address the NO_x exceedances from CHP2, the Contractor is studying operational improvements to improve the efficiency of the process with a view to reducing the frequent stopping/ starting of the system. 	
	 To address the NO_x exceedances from CHP3, the Contractor overhauled CHP3 in January 2024 and the number of exceedances has been reduced since that time, with a view to eliminating all exceedances as the process efficiency can be improved. 	
	 To address the SO₂ exceedances from the CHPs, the Contractor will issue the letter on the implementation of the QAL2 calibration results mentioned above, having addressed all comments received from MT and IEC. The expected date for implementation is May 2024. 	
	 To address the various exceedances from the ASP, the Contractor will conduct an overhaul of the ASP at the end of March 2024 to increase reliability. In addition, a drum screen is targeted to be installed by early March 2024 to decrease the solids entering the ASP in order to improve the efficiency and reliability of the system. 	

Prepared by: Alex Khawaja Waheed, MT Representative

Date 23 May 2024

Project Ref. No.	ORRC-EC-002-20240219
Date	19 February 2024
Date of Notification	28 February 2024
Location	Site boundary along Sham Fung Road
Description	During the daytime hours of 19 February 2024 (Monday), a complainant from outside of ORRC1 site premises called the government hotline to lodge a complaint as quoted below:
	投訴大嶼山小蠔灣深豐路有機資源回收中心發出刺鼻臭味,要求部門跟進及回覆。(original version)
	Complaint about the unpleasant odour emitted by the Organic Waste Recycling Centre on Sham Fung Road, Tai O, Lantau Island. Requesting the department to follow up and provide a response. (English translation)
Action / Limit Levels	Since five odour complaints were received within one week (19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024), the Limit Level of Odour Nuisance was triggered (ref: Table 2.7 EM&A Manual Rev. F – July 2019).
Possible reason for Non-compliance	The Contractor has conducted an initial investigation following the complaint received on 19 February 2024. The odour nuisance may be due to the ongoing annual cleaning of the Suspension Buffer Tank (SBT), which required emptying the contents from the SBT via vacuum tank on 19 February 2024, and later also required opening of the tank at the ground level to allow for works access on 21 February 2024.
	Further investigation was conducted during a site visit by Environmental Protection Department Regional Office (EPD RO) on 22 February 2024. The inspection noted the emptying of the SBT tank and a pile of pre-digest mixture exposed to the open air until a grab truck could arrive for clearance. These activities were likely the source of the odour nuisance and EPD RO recommended mitigation measures to be implemented.
Action Taken / Action to be Taken	The Contractor investigated the reason for the Environmental Complaint (odour nuisance) and arranged Remedial Works and Follow-up Actions (see below).
Remedial Works and Follow-up Actions	Following the complaint of odour nuisance received, OSCAR implemented mitigation measures to address the odour source at the SBT tank in accordance with Table 2.8 – Event and Action Plan for Odour Monitoring of the EM&A Manual (Rev. F – July 2019):
	 The Contractor temporarily stopped the cleaning of the SBT tank to reduce the odour from 22-28 February 2024;
	 Implemented the use of canvas barriers around the working area to prevent the spread of odour;
	Set up fans to inject deodourisers to the air around the SBT tank;
	 Channelled some of the air being emitted from the SBT tank and cleaning process through the CAPCS system to mitigate the odour;
	 Arranged for daily ad-hoc odour patrols around the perimeter of the ORRC1 site;



Investigation Report of Environmental Complaint (Odour Nuisance) - 19 February 2024

- After odour patrol on 26 February 2024 found no sampling locations with an Odour Intensity of Level 2 or higher, ceased additional odour patrols; and
- The other mitigation measures will remain in place until SBT tank cleaning is finished, currently scheduled to end on 20 March 2024.

Prepared by: Alex Khawaja Waheed, MT Representative

Date 8 March 2024



Project Ref. No.	ORRC-EC-003-20240220
- Troject Neil Noi	Office LC 003 20210220
Date	20 February 2024
Date of Notification	8 March 2024
Location	Site boundary along Sham Fung Road
Description	During the daytime hours of 20 February 2024 (Tuesday), a complainant from outside of ORRC1 site premises called the government hotline to lodge a complaint as quoted below:
	投訴O·PARK1 (有機資源回收中心第一期) 處理廚餘發出臭味造成環境衛生滋擾。(original version)
	Complaint about the foul odour emitted from O·PARK1 (Phase 1 of the Organic Resource Recycling Centre), causing environmental and sanitation disturbances. (English translation)
Action / Limit Levels	Since five odour complaints were received within one week (19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024), the Limit Level of Odour Nuisance was triggered (ref: Table 2.7 EM&A Manual Rev. F – July 2019).
Possible reason for Non-compliance	The Contractor has conducted an initial investigation following the complaint received on 19 February 2024. The odour nuisance may be due to the ongoing annual cleaning of the Suspension Buffer Tank (SBT), which required emptying the contents from the SBT via vacuum tank on 19 February 2024, and later also required opening of the tank at the ground level to allow for works access on 21 February 2024.
	Further investigation was conducted during a site visit by Environmental Protection Department Regional Office (EPD RO) on 22 February 2024. The inspection noted the emptying of the SBT tank and a pile of pre-digest mixture exposed to the open air until a grab truck could arrive for clearance. These activities were likely the source of the odour nuisance and EPD RO recommended mitigation measures to be implemented.
Action Taken / Action to be Taken	The Contractor investigated the reason for the Environmental Complaint (odour nuisance) and arranged Remedial Works and Follow-up Actions (see below).
Remedial Works and Follow-up Actions	Following the complaint of odour nuisance received, OSCAR implemented mitigation measures to address the odour source at the SBT tank in accordance with Table 2.8 - Event and Action Plan for Odour Monitoring of the EM&A Manual (Rev. F – July 2019):
	 The Contractor temporarily stopped the cleaning of the SBT tank to reduce the odour from 22-28 February 2024;
	 Implemented the use of canvas barriers around the working area to prevent the spread of odour;
	Set up fans to inject deodourisers to the air around the SBT tank;
	 Channelled some of the air being emitted from the SBT tank and cleaning process through the CAPCS system to mitigate the odour;
	Arranged for daily ad-hoc odour patrols around the perimeter of the ORRC1 site;



Investigation Report of Environmental Complaint (Odour Nuisance) - 20 February 2024

- After odour patrol on 26 February 2024 found no sampling locations with an Odour Intensity of Level 2 or higher, ceased additional odour patrols; and
- The other mitigation measures will remain in place until SBT tank cleaning is finished, currently scheduled to end on 20 March 2024.

Prepared by: Alex Khawaja Waheed, MT Representative

Date 8 March 2024



Investigation Report of E	Environmental Complaint (Odour Nuisance) – 21 February 2024 (1st Complaint)
Project Ref. No.	ORRC-EC-004-20240221
Date	21 February 2024
Date of Notification	8 March 2024
Location	Site boundary along Sham Fung Road
Description	During the daytime hours of 21 February 2024 (Wednesday), a complainant from outside of ORRC1 site premises called the government hotline to lodge a complaint as quoted below:
	投訴深豐路0·PARK及龍運巴士小蠔灣車廠一帶有大量異味傳出。(original version)
	Complaint about the strong odour emanating from the vicinity of Sham Fung Road, O-PARK1 and Long Win Bus Siu Ho Wan Depot. (English translation)
Action / Limit Levels	Since five odour complaints were received within one week (19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024), the Limit Level of Odour Nuisance was triggered (ref: Table 2.7 EM&A Manual Rev. F – July 2019).
Possible reason for Non-compliance	The Contractor has conducted an initial investigation following the complaint received on 19 February 2024. The odour nuisance may be due to the ongoing annual cleaning of the Suspension Buffer Tank (SBT), which required emptying the contents from the SBT via vacuum tank on 19 February 2024, and later also required opening of the tank at the ground level to allow for works access on 21 February 2024.
	Further investigation was conducted during a site visit by Environmental Protection Department Regional Office (EPD RO) on 22 February 2024. The inspection noted the emptying of the SBT tank and a pile of pre-digest mixture exposed to the open air until a grab truck could arrive for clearance. These activities were likely the source of the odour nuisance and EPD RO recommended mitigation measures to be implemented.
Action Taken / Action to be Taken	The Contractor investigated the reason for the Environmental Complaint (odour nuisance) and arranged Remedial Works and Follow-up Actions (see below).
Remedial Works and Follow-up Actions	Following the complaint of odour nuisance received, OSCAR implemented mitigation measures to address the odour source at the SBT tank in accordance with Table 2.8 – Event and Action Plan for Odour Monitoring of the EM&A Manual (Rev. F – July 2019):
	 The Contractor temporarily stopped the cleaning of the SBT tank to reduce the odour from 22-28 February 2024;
	 Implemented the use of canvas barriers around the working area to prevent the spread of odour;
	Set up fans to inject deodourisers to the air around the SBT tank;
	 Channelled some of the air being emitted from the SBT tank and cleaning process through the CAPCS system to mitigate the odour;
	 Arranged for daily ad-hoc odour patrols around the perimeter of the ORRC1 site;



Investigation Report of Environmental Complaint (Odour Nuisance) – 21 February 2024 (1st Complaint)

- After odour patrol on 26 February 2024 found no sampling locations with an Odour Intensity of Level 2 or higher, ceased additional odour patrols; and
- The other mitigation measures will remain in place until SBT tank cleaning is finished, currently scheduled to end on 20 March 2024.

Prepared by: Alex Khawaja Waheed, MT Representative

Date 8 March 2024



Investigation Report of Environmental Complaint (Odour Nuisance) – 21 February 2024 (2 nd Complaint)	
Project Ref. No.	ORRC-EC-005-20240221
Date	21 February 2024
Date of Notification	8 March 2024
Location	Site boundary along Sham Fung Road
Description	During the daytime hours of 21 February 2024 (Wednesday), a complainant from outside of ORRC1 site premises called the government hotline to lodge a complaint as quoted below:
	投訴大嶼山深豐路有機資源回收中心第1期發出臭味,造成滋擾,要求部門跟進。(original version)
	Complaint about the foul odour emitted from Phase 1 of the Organic Resource Recycling Centre on Sham Fung Road, Lantau Island, causing disturbances. Requesting the department to follow up. (English translation)
Action / Limit Levels	Since five odour complaints were received within one week (19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024), the Limit Level of Odour Nuisance was triggered (ref: Table 2.7 EM&A Manual Rev. F – July 2019).
Possible reason for Non-compliance	The Contractor has conducted an initial investigation following the complaint received on 19 February 2024. The odour nuisance may be due to the ongoing annual cleaning of the Suspension Buffer Tank (SBT), which required emptying the contents from the SBT via vacuum tank on 19 February 2024, and later also required opening of the tank at the ground level to allow for works access on 21 February 2024.
	Further investigation was conducted during a site visit by Environmental Protection Department Regional Office (EPD RO) on 22 February 2024. The inspection noted the emptying of the SBT tank and a pile of pre-digest mixture exposed to the open air until a grab truck could arrive for clearance. These activities were likely the source of the odour nuisance and EPD RO recommended mitigation measures to be implemented.
Action Taken / Action to be Taken	The Contractor investigated the reason for the Environmental Complaint (odour nuisance) and arranged Remedial Works and Follow-up Actions (see below).
Remedial Works and Follow-up Actions	Following the complaint of odour nuisance received, OSCAR implemented mitigation measures to address the odour source at the SBT tank in accordance with Table 2.8 – Event and Action Plan for Odour Monitoring of the EM&A Manual (Rev. F – July 2019):
	 The Contractor temporarily stopped the cleaning of the SBT tank to reduce the odour from 22-28 February 2024;
	 Implemented the use of canvas barriers around the working area to prevent the spread of odour;
	Set up fans to inject deodourisers to the air around the SBT tank;
	 Channelled some of the air being emitted from the SBT tank and cleaning process through the CAPCS system to mitigate the odour;
	 Arranged for daily ad-hoc odour patrols around the perimeter of the ORRC1 site;



Investigation Report of Environmental Complaint (Odour Nuisance) – 21 February 2024 (2nd Complaint)

- After odour patrol on 26 February 2024 found no sampling locations with an Odour Intensity of Level 2 or higher, ceased additional odour patrols; and
- The other mitigation measures will remain in place until SBT tank cleaning is finished, currently scheduled to end on 20 March 2024.

Prepared by: Alex Khawaja Waheed, MT Representative

Date 8 March 2024



Investigation Report of Environmental Complaint (Odour Nuisance) – 22 February 2024	
Project Ref. No.	ORRC-EC-006-20240222
Date	22 February 2024
Date of Notification	28 February 2024
Location	Site boundary along Sham Fung Road
Description	During the daytime hours of 22 February 2024 (Thursday), a complainant from outside of ORRC1 site premises called the government hotline to lodge a complaint as quoted below:
	投訴人指東涌翔東路近深豐路 L/P FB7275至FB7278 範圍內發出酸臭味,並指附近有個有機資源回
	收中心,不清楚是否由此發出,要求部門跟進。(original version)
	The complainant alleges that there is a sour and pungent odour emanating from within the vicinity of L/P FB7275 to FB7278 on Cheung Tung Road, Tung Chung, near Sham Fung Road. They also mention the presence of an organic waste recycling centre nearby but are unsure if the odour originates from there. They request the department to follow up on the matter. (English translation)
Action / Limit Levels	Since five odour complaints were received within one week (19 February 2024, 20 February 2024, 21 February 2024 (2 complaints), and 22 February 2024), the Limit Level of Odour Nuisance was triggered (ref: Table 2.7 EM&A Manual Rev. F – July 2019).
Possible reason for Non-compliance	The Contractor has conducted an initial investigation following the complaint received on 19 February 2024. The odour nuisance may be due to the ongoing annual cleaning of the Suspension Buffer Tank (SBT), which required emptying the contents from the SBT via vacuum tank on 19 February 2024, and later also required opening of the tank at the ground level to allow for works access on 21 February 2024.
	Further investigation was conducted during a site visit by Environmental Protection Department Regional Office (EPD RO) on 22 February 2024. The inspection noted the emptying of the SBT tank and a pile of pre-digest mixture exposed to the open air until a grab truck could arrive for clearance. These activities were likely the source of the odour nuisance and EPD RO recommended mitigation measures to be implemented.
Action Taken / Action to be Taken	The Contractor investigated the reason for the Environmental Complaint (odour nuisance) and arranged Remedial Works and Follow-up Actions (see below).
Remedial Works and Follow-up Actions	Following the complaint of odour nuisance received, OSCAR implemented mitigation measures to address the odour source at the SBT tank in accordance with Table 2.8 – Event and Action Plan for Odour Monitoring of the EM&A Manual (Rev. F – July 2019):
	 The Contractor temporarily stopped the cleaning of the SBT tank to reduce the odour from 22-28 February 2024;
	 Implemented the use of canvas barriers around the working area to prevent the spread of odour;
	Set up fans to inject deodourisers to the air around the SBT tank;



Investigation Report of Environmental Complaint (Odour Nuisance) - 22 February 2024

- Channelled some of the air being emitted from the SBT tank and cleaning process through the CAPCS system to mitigate the odour;
- Arranged for daily ad-hoc odour patrols around the perimeter of the ORRC1 site;
- After odour patrol on 26 February 2024 found no sampling locations with an Odour Intensity of Level 2 or higher, ceased additional odour patrols; and
- The other mitigation measures will remain in place until SBT tank cleaning is finished, currently scheduled to end on 20 March 2024.

Prepared by: Alex Khawaja Waheed, MT Representative

Date 8 March 2024





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