ASB Biodiesel (Hong Kong) Limited

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate

Monthly EM&A Report July 2016 (Version 1.0)

Certified By	Than
	(Environmental Team Leader)

REMARKS:

The information supplied and contained within this report is, to the best of our knowledge, correct at the time of printing.

CINOTECH accepts no responsibility for changes made to this report by third parties ~

CINOTECH CONSULTANTS LTD

Room 1710, Technology Park, 18 On Lai Street, Shatin, NT, Hong Kong Tel: (852) 2151 2083 Fax: (852) 3107 1388 Email: info@cinotech.com.hk



Address: 5/F, Winning Commercial Building, 46-48 Hillwood Road, Tsim Sha Tsui, Kowloon Tel: 852 - 3168 2028 Fax: 852 - 3168 2022

Subject:	t: Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate Monthly EM&A Report (July 2016)			
Job No.	D1067	Total Pages:	1	
From:	Mr. Mark Cheung	Ref:	D1067/L06722	
Attn:	Mr. H. T. Lai	Fax:	3107 1388	
To:	Cinotech	Date:	25 October 2016	

Dear Sir,

We refer to your submission of the Monthly EM&A Report for July 2016 via email dated 25 October 2016.

We write to advise that we have no comment on the captioned report.

However, it is noted that the incident of exceedance of limit level keeps happening. You are advised to investigate the incidents in detail, evaluate the the effectiveness of the remedial measures that have been carried out and propose appropriate remedial measures to make sure the limit level will not be exceeded.

Please promptly implement such measures and keep tracking on the effectiveness of the proposed measures.

Regards,

Mark Cheung Independent Environmental Checker KTC/gk

TABLE OF CONTENTS

		Page
EX	ECUTIVE SUMMARY	1
	Introduction Environmental Licenses and Permits Environmental Monitoring and Audit Works Key Information in the Reporting Month	
1	INTRODUCTION	2
	Background Project Organizations Summary of EM&A Requirements	2
2	STATUS OF ENVIRONMENTAL LICENSING AND PERMITTING	G4
3	ENVIRONMENTAL MONITORING REQUIREMENTS	5
	Air Quality Water Quality Sulphur Content in Bio Heating Oil	8
4	MONITORING METHODOLOGY	
	Air Quality Water Quality Sulphur Content in Bio Heating Oil	
5	MONITORING RESULTS	14
	Air Quality Water Quality Sulphur Content in Bio Heating Oil	16
6	SUMMARY OF COMPLAINT AND PROSECUTION	
7	CONCLUSIONS	

LIST OF TABLES

- Table ISummary of Key Information in July 2016
- Table 1-1Key Project Contacts
- Table 2-1
 Summary of Environmental Licensing and Permit Status
- Table 3-1Monitoring Criteria for the Emission from Stacks of Boiler, Biogas Flare and
Process Building
- Table 3-2Monitoring Criteria for the Odour Concentrations at the Final Air Scrubber
and Odour Patrols along the Project Site Boundary
- Table 3-3Event and Action Plan for Air Quality Monitoring
- Table 3-4Monitoring Criteria for the Water Quality of Treated Effluent Discharged
from Project Site and Stormwater Discharge
- Table 3-5Event and Action Plan for Water Quality Monitoring
- Table 3-6Monitoring Criteria for Sulphur Content in Bio Heating Oil
- Table 4-1Methodologies for Monitoring of Emission from Stacks of Boiler and Biogas
Flare
- Table 4-2Methodologies for Monitoring of Emission from Stack of Process Building
- Table 4-3Methodologies for Monitoring of Odour Concentrations at the Final Air
Scrubber
- Table 4-4Methodologies for Water Quality Monitoring of Treated Effluent Discharged
from Project Site
- Table 4-5Methodologies for Water Quality Monitoring of Stormwater discharge
- Table 5-1Monitoring Result of the Emission from the Stack of Boiler
- Table 5-2Monitoring Result of the Emission from the Stack of Biogas Flare
- Table 5-3Monitoring Result of the Emission from the Stack of Process Building
- Table 5-4Monitoring Result of the Odour Concentrations at the Final Air Scrubber
- Table 5-5Monitoring Result of Odour Patrols along Site Boundary
- Table 5-6Water Quality Monitoring Result of Treated Effluent Discharged from Project
Site
- Table 5-7
 Water Quality Monitoring Result of Stormwater Discharge
- Table 5-8Monitoring Result of Sulphur Content in Bio Heating Oil

LIST OF FIGURES

Figure 1.1 Location Plan

LIST OF APPENDICES

- Appendix A Air Quality Monitoring Report Emission from Stack of Boiler
- Appendix B Air Quality Monitoring Report Emission from Stack of Biogas Flare
- Appendix C Air Quality Monitoring Report Emission from Stack of Process Building
- Appendix D Air Quality Monitoring Report Odour Measurement at Final Air Scrubber
- Appendix E Air Quality Monitoring Report Odour Patrol
- Appendix F Water Quality Monitoring Result Effluent from Wastewater Treatment Plant
- Appendix G Water Quality Monitoring Result Stormwater Discharge
- Appendix H Test Result Sulphur Content in Bio Heating Oil
- Appendix I Complaint Log
- Appendix J Investigation Report of Environmental Quality Limit Exceedances (July 2016)

EXECUTIVE SUMMARY

Introduction

1. This is the 4th monthly Environmental Monitoring and Audit (EM&A) Report prepared by Cinotech Consultants Limited for Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate in operational phase. This report documents the findings of EM&A works carried out in July 2016.

Environmental Licenses and Permits

- 2. Licenses/Permits granted to the Project include the followings:
 - Environmental Permit, EP-319/2009/D, granted on 28 January 2014;
 - Specified Process Licence, L-25-019(1), granted on 10 October 2013 &
 - Water Pollution Control Ordinance Licence, WT00022972-2015, granted on 16 December 2015.

Environmental Monitoring and Audit Works

3. Environmental monitoring and audit works for the Project were carried out in accordance with the criteria and requirements listed in the EM&A Manual, Environmental Permit, Specified Process Licence and Water Pollution Control Ordinance (WPCO) Licence granted. Monitoring results were checked and reviewed.

Key Information in the Reporting Month

4. Summary of key information in this reporting month (July 2016) is listed in **Table I**.

Event	Ev	vent Details	Action Taken	Status	Remark	
Event	Number	Nature	Action Taken	Status	кешагк	
Exceedance of Action & Limit Levels	5		Exceedance events were investigated and measures have been proposed.	N/A		
Complaint received	0		N/A	N/A		
Changes to the assumptions and key construction / operation activities recorded	0		N/A	N/A		
Status of submissions under EP	1	Monthly EM&A Report for May 2016	Submitted to EPD on 29 July 2016	Verified by IEC		
Notifications of any summons & prosecutions	0		N/A	N/A		

Table ISummary of Key Information in July 2016

1

1 **INTRODUCTION**

Background

- 1.1 Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate (hereafter referred to as "the Project") is to construct and operate a 100,000 tonnes per annum biodiesel plant at Tseung Kwan O Industrial Estate (see Figure 1.1 for the location plan of Project Site). The plant will use a multi-feedstock which consists of used cooking oil (UCO), oil and grease recovered from grease trap waste (GTW), palm fatty acid distillate (PFAD) and animal fats. The proposed biodiesel plant offers a convenient recycling outlet for GTW and UCO, and converts oil and grease recovered from these wastes into useful products. The Project also offers a more environmental-friendly alternative to the diesel fuel market in Hong Kong.
 - This Project is a Designated Project under the Environmental Impact Assessment 1.2 Ordinance (Cap. 499). An environmental impact assessment (EIA) was undertaken to identify and evaluate the impact on environment (e.g. air quality, noise, water quality and ecology), and propose possible measures to mitigate the impact. The EIA Report was approved by the Environmental Protection Department (EPD) on 26 February 2009.
 - 1.3 Environmental Permit (EP) No. EP-319/2009 was issued on 11 March 2009 to ASB Biodiesel (Hong Kong) Limited as the Permit Holder. After several rounds of amendments, the latest version is EP No. EP-319/2009/D, which was issued on 28 January 2014.
 - 1.4 Construction of the Biodiesel Plant has been completed since October 2013. After more than 2 years of commissioning trial, the Plant started to operate in April 2016. Cinotech Consultants Limited was commissioned by ASB Biodiesel (Hong Kong) Limited to undertake the Environmental Monitoring and Audit (EM&A) works for the Project. This is the 4th Monthly EM&A report summarizing the EM&A works in operational phase for the Project in July 2016.

Project Organizations

- Different parties with different levels of involvement in the project organization include: 1.5
 - Project Proponent & Operator –
- ASB Biodiesel (Hong Kong) Limited
- Independent Environmental Checker (IEC) Mannings (Asia) Consultants Ltd. Cinotech Consultants Limited
- Environmental Team (ET) –
- 1.6 The responsibilities of respective parties are detailed in Section 2 of the Final EM&A Manual of the Project.
- 1.7 The key contacts of the Project are shown in **Table 1-1**.

Party	Role	Name	Position	Phone No.
ASB	Permit Holder &	Mr. Albert Kwan	Facilities and Operations Manager	3183 4209
TIGE	Operator	Ms. Fion Wong	Engineer	3183 4204
Monnings	Independent	Mr. Mark Cheung	Independent Environmental Checker	3168 2028
Mannings Environmental Checker		Mr. Gavin Kwok	Assistant to Independent Environmental Checker	3970 8628
Cinotech	Environmental	Dr. HF Chan	ET Leader	2151 2088
	Team	Ms. Betty Choi	Project Coordinator	2151 2072

Table 1-1Key Project Contacts

Summary of EM&A Requirements

- 1.8 EM&A requirements for the Project include:
 - Monitoring requirements as listed in the Project EM&A Manual; &
 - Conditions listed in the Environmental Permit.

2 STATUS OF ENVIRONMENTAL LICENSING AND PERMITTING

2.1 All permits/licenses obtained for the Project are summarized in **Table 2-1**.

Table 2-1Summary of Environmental Licensing and Permit Status

Derreit / Lissen and No.	Valid	Period	9	C 4 - 4	
Permit / License No.	From	То	Summary	Status	
Environmental Permit (EP)					
EP-319/2009/D	28/01/2014	N/A	 Operation of a biochemical plant with a storage capacity of more than 500 tonnes and in which substances are processed and produced; a storage, transfer and transhipment of oil facility with a storage capacity of not less than 1,000 tonnes; and a dangerous goods godown with a storage capacity exceeding 500 tonnes 	Valid	
Specified Process (SP)) Licence				
L-25-016(1)	10/10/2013	10/10/2015	• Emission of non-fugitive fixed point emissions	Under renewal	
Water Pollution Cont	rol Ordinance ((WPCO) Licen	ce		
WT00022972-2015	16/12/2015	31/12/2017	 Discharge of effluent from wastewater treatment facilities to communal foul sewer; and effluent from floor washing of operation areas to communal storm drain 	Valid	

3 ENVIRONMENTAL MONITORING REQUIREMENTS

Air Quality

- 3.1 According to Section 4.3 of the Final EM&A Manual of the Project, the emission from stacks of boiler, biogas flare and process building, and odour concentrations at the final air scrubber shall be monitored. Odour patrols along the Project Site boundary is also required.
- 3.2 Monitoring criteria (i.e. frequency, parameter, and action & limit levels) for the emission of the boiler stack, biogas flare and process building are listed in **Table 3-1**, while criteria for odour concentrations at the final air scrubber and odour patrols along the Project Site boundary are listed in **Table 3-2**.

Stack	Frequency *	Parameter	Limit Levels**	
		Nitrogen oxides (NO _X)	2.213 kg/h	
		Carbon monoxide (CO)	0.553 kg/h	
Boiler		Sulphur dioxide (SO ₂)	0.797 kg/h	
(EP2)	Monthly for the first 12	Non-methane Organic Compounds (NMOC)	0.041 kg/h	
	months of operation. If the monitoring results of the	Exhaust gas velocity	7 m/s (minimum)	
	first year monitoring meet	NO _X	0.053 kg/h	
Biogas	the limit level, the monitoring will be reduced	СО	0.018 kg/h	
Flare	to half-yearly intervals for	SO ₂	0.039 kg/h	
(EP1)	(EP1) the whole operational stage.	NMOC	0.0018 kg/h	
		Exhaust gas velocity	0.54 m/s (minimum)	
Process	Process	Acetyldehyde	0.0975 kg/h	
Building		Methanol	0.0975 kg/h	
(EP3)		Exhaust gas velocity	0.79 m/s (minimum)	
 Monitoring will not be carried out during raining days ** No action level is set in the Final EM&A Manual of the Project and in the Specified Process Licence 				

Table 3-1Monitoring Criteria for the Emission from Stacks of Boiler, BiogasFlare and Process Building

** No action level is set in the Final EM&A Manual of the Project and in the Specified Process Licence

Table 3-2	Monitoring Criteria for the Odour Concentrations at the Final Air
	Scrubber and Odour Patrols along the Project Site Boundary

	Frequency	Parameter	Action Levels	Limit Levels
Odour Concentrations	Manthla fan tha fint 2 mars of	Odour		200.3 OU/s
Concentrations at the Final Air Scrubber (EP5)	Monthly for the first 2 years of operation *	Exhaust gas velocity	_ **	0.7 m/s (minimum)
Odour Patrols along the Project Site Boundary	 Two times a day, one in the morning and one in the afternoon Monthly for the first 12 months of operation. If the monitoring results of the first year monitoring meet the limit level, the monitoring frequency will be reduced to quarterly intervals in the second year; If the action level is triggered during the second year of operation, the frequency will be resumed to monthly intervals until compliance with the action level for three consecutive months is obtained; If the action level is not triggered for four consecutive quarterly monitoring, the monitoring can be terminated. 	Odour Intensity	 Odour intensity ≥ Class 2 recorded; or One documented complaint received 	• Odour intensity ≥Class 3 recorded on 2 consecutive patrols
-	t be carried out during raining days s set in the Final EM&A Manual of the Project	and in the Specified Process	Licence	

3.3 If action / limit levels are exceeded, the following actions should be taken by the ET:

- Inform Project Proponent and IEC, and investigate and record the cause of exceedance within 24 hours;
- Repeat measurement to confirm findings; and
- Implement the event and action plan as shown in **Table 3-3**.

Event	Actions			
Event	ET Leader	IEC	Project Proponent	
Exceedance of Limit Level for stack emission from boiler, biogas flare, process building and final air scrubber	 Repeat measurement to confirm finding Identify source(s) and investigate the cause(s) of exceedance Inform Project Proponent whether the cause of exceedance is due to the Project Prepare the Notification of Exceedance within 24 hours Discuss remedial actions with the Project Proponent Assess the effectiveness of Project Proponent's remedial actions For the monitoring of emissions from the stacks of the boiler, biogas flare and process building, increase the monitoring frequency from half-yearly (for the second year onward) to monthly intervals. If results of three consecutive monthly monitoring show no exceedance of the limit level, the monitoring frequency will be reverted back to half-yearly 	 Verify the Notification of Exceedance submitted by the ET Leader Check with the Project Proponent on the operating activities and implementation of control measures Discuss with ET Leader and Project Proponent on the possible remedial actions Advise the Project Proponent on the proposed remedial measures Supervise implementation of remedial measures 	 Rectify any unacceptable practice Amend working methods as required Implement amended working methods, if necessary 	
Exceedance of Action Level for odour	 intervals. Identify source(s) / reason of exceedance or complain Prepare the odour complain form or the Notification of Exceedance within 24 hours Inform Project Proponent whether the cause of exceedance is due to the Project Discuss remedial actions with the Project Proponent During the second year of operation, if the action level is triggered, the frequency will be resumed to monthly until compliance with the action level for three consecutive months is obtained and the frequency will be reduced to quarterly intervals thereafter. 	• Verify the Notification of Exceedance submitted by the ET Leader	 Rectify any unacceptable practice Amend working methods as required Implement amended working methods, if necessary 	

 Table 3-3
 Event and Action Plan for Air Quality Monitoring

Event	Actions			
Event	ET Leader	IEC	Project Proponent	
Exceedance of Limit Level for odour	 Identify source(s) / reason of exceedance or complain Prepare the odour complain form or the Notification of Exceedance within 24 hours Inform Project Proponent whether the cause of exceedance is due to the Project Assess the effectiveness of Project Proponent's remedial actions or amended design 	Proponent on the operating activities and implementation	 practice Propose and implement remedial measures or amend design as required within 3 	

Water Quality

- 3.4 According to Section 6.3 of the Final EM&A Manual of the Project, the water quality of treated effluent discharged from Project Site and stormwater discharge shall be monitored.
- 3.5 Monitoring criteria (i.e. frequency, parameter, and limit levels) for the water quality of treated effluent discharged from Project Site and stormwater discharge are listed in **Table 3-4**.

Discharge	Frequency	Parameter	Limit Levels*	
		pH	Within the range of 6 - 10	
		Suspended Solids	800 mg/L	
		Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	800 mg/L	
Treated Effluent	Manul 1	Chemical Oxygen Demand (COD)	2000 mg/L	
Discharged from Project Site	Monthly	Oil & Grease	50 mg/L	
		Sulphate	1000 mg/L	
		Total Nitrogen	200 mg/L	
		Total Phosphorus	50 mg/L	
		pH	Within the range of $6-9$	
		Suspended Solids	50 mg/L	
Stormwater Discharge	Quarterly	Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	50 mg/L	
Discharge		Chemical Oxygen Demand (COD)	100 mg/L	
		Oil & Grease	30 mg/L	
* No action level was set in the WPCO Licence				

Table 3-4Monitoring Criteria for the Water Quality of Treated EffluentDischarged from Project Site and Stormwater Discharge

- 3.6 If limit levels are exceeded, the following actions should be taken by the ET:
 - Inform Project Proponent and IEC, and investigate and record the cause of exceedance within 24 hours;
 - Repeat measurement to confirm findings; and
 - Implement the event and action plan as shown in **Table 3-5**.

Table 3-5	Event and Action Plan for Water Quality Monitoring
-----------	--

Event	Actions				
Event	ET Leader	IEC	Project Proponent		
Exceedance of Limit Level for Treated Effluent Discharged from Project Site	 Identify source(s) and investigate the cause(s) of exceedance Repeat measurement to confirm finding Prepare the Notification of Exceedance within 24 hours Discuss remedial actions with the Project Proponent Assess the effectiveness of Project Proponent's remedial actions 	 Verify the Notification of Exceedance submitted by the ET Leader Check with Contractor on the operating activities and implementation of landfill gas control measures Discuss with ET Leader and Contractor on the possible remedial actions Advise the IC on the effectiveness of the proposed remedial measures Supervise implementation of remedial measures 	 Check the performance of the on-site WWTP Rectify any unacceptable performance Carry out remedial measures or amend design as required Implement amended design, if necessary 		
Exceedance of Limit Level for Stormwater Discharged from the Project Site	 Identify source(s) and investigate the cause(s) of exceedance Repeat measurement to confirm finding Prepare the Notification of Exceedance within 24 hours Discuss remedial actions with the Project Proponent Assess the effectiveness of Project Proponent's remedial actions 	 Verify the Notification of Exceedance submitted by the ET Leader Check with Project Proponent on the operating activities Discuss with ET Leader and Project Proponent on the possible remedial actions Advise the Project Proponent on the effectiveness of the proposed remedial measures Supervise implementation of remedial measures 	 Propose and implement remedial measures or amend design as required Rectify any unacceptable practice Amend working methods as required Implement amended working methods, if necessary 		

Sulphur Content in Bio Heating Oil

- 3.7 According to Section 3.11 of the EP-319/2009/D, if Bio Heating Oil (BHO) is used on site, the sulphur content in BHO shall be monitored.
- 3.8 Monitoring criteria (i.e. frequency, parameter, and limit level) for the sulphur content in BHO are listed in **Table 3-6**.

Table 3-6	Monitoring Criteria for	r Sulphur Content in Bi	o Heating Oil
-----------	-------------------------	-------------------------	---------------

Frequency	Parameter	Limit Level*
 Every tank load of the BHO for the BHO's sulphur content when the fuel tank(s) is being filled/refilled This original frequency shall be adopted in the first three months of using BHO on site. After the first three months of the original monitoring regime, if all monitoring result in the first three months meet the limit level, the frequency may be reduced to one test for every two refills for the next three months; and after the first six months, the monitoring may be conducted once a month. If exceedance occur, the monitoring shall be reverted to the original frequency of a test for every tank load of BHO, or at such a monitoring frequency to be advised and agreed by the EPD's Director. 	Sulphur Content	346 ppm
* No action level was set in the EP of the Project		

3.9 If limit level is exceeded, the following actions should be taken by the ET:

- Inform Project Proponent and IEC within 24 hours;
- Repeat measurement to confirm findings;
- Inform Project Proponent to increase the use of low sulphur diesel in the fuel tank(s) to achieve a fuel mixture with sulphur content of less than 346 ppm; and
- Revert the monitoring programme to the original frequency of a test for every tank load of BHO, or at such a monitoring frequency to be advised and agreed by the EPD's Director.

4 MONITORING METHODOLOGY

Air Quality

Emission from Stacks of Boiler, Biogas Flare

4.1 Emissions from the stack of boiler and from the stack of biogas flare were sampled and analyzed. Methods adopted for analysis are listed in **Table 4-1**. Detailed monitoring methodologies for emissions from the stack of boiler and from the stack of biogas flare are presented in **Appendix A** and in **Appendix B** respectively.

Table 4-1Methodologies for Monitoring of Emission from Stacks of Boiler and
Biogas Flare

Parameter	Methodology
Nitrogen oxides (NOx)	USEPA Method 7C
Carbon monoxide (CO)	USEPA Method 10B
Sulphur dioxide (SO ₂)	USEPA Method 6
Non-methane organic compounds (NMOC)	USEPA Method TO-12
Exhaust gas velocity	USEPA Method 2

Emission from Stack of Process Building

4.2 Emission from the stack of process building was sampled and analyzed. Methods adopted for analysis are listed in **Table 4-2**. Detailed monitoring methodology for emission from the stack of process building is presented in **Appendix C**.

Table 4-2	Methodologies	for	Monitoring	of	Emission	from	Stack	of	Process
	Building								

Parameter	Methodology
Acetaldehyde	USEPA Method TO-11A
Methanol	USEPA Method TO-14A
Exhaust gas velocity	USEPA Method 2

Odour Concentrations at the Final Air Scrubber

4.3 Gas in the final air scrubber was sampled and analyzed. Methods adopted for analysis are listed in **Table 4-3**. Detailed methodology for odour monitoring in the final air scrubber is presented in **Appendix D**.

Table 4-3Methodologies for Monitoring of Odour Concentrations at the Final
Air Scrubber

Parameter	Methodology
Odour concentration	European Standard Method (EN13725)
Exhaust gas velocity	USEPA Method 2

Odour Patrols along Site Boundary

4.4 Odour patrols were carried out by a qualified odour panelist in both morning and afternoon on 5 July 2016. During odour patrol, the panelist identified the odour nature and determined the odour intensity, which is expressed using an odour intensity scale, at all 5 selected locations. Weather conditions including prevailing weather, wind direction and wind speed were also recorded. Detailed methodology for odour patrol is presented in **Appendix E**.

Water Quality

Water Quality of Treated Effluent Discharged from Project Site

4.5 Treated effluent discharged from Project Site was sampled and analyzed. Methodologies for water quality monitoring were followed either American Public Health Association's (APHA's) "Standard Methods for the Examination of Water & Wastewater" or Hach Method, which are listed in **Table 4-4**. In addition to the parameters listed in **Table 4-4**, pH was measured.

Parameter	Methodology
Suspended Solids (S.S.)	APHA 2540D
Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	APHA 5210B
Chemical Oxygen Demand (COD)	Hach Method 8000
Oil & Grease	APHA 5520B

Table 4-4Methodologies for Water Quality Monitoring of Treated Effluent
Discharged from Project Site

Parameter	Methodology
Sulphate	Hach Method 10248
Total Nitrogen	Hach Method 10071
Total Phosphorus	Hach Method 8190

Water Quality of Stormwater Discharge

4.6 Water quality of stormwater discharge from Project Site was sampled and analyzed. Methodologies for water quality monitoring were followed either American Public Health Association's (APHA's) "Standard Methods for the Examination of Water & Wastewater" or Hach Method, which are listed in **Table 4-5**. In addition to the parameters listed in **Table 4-5**, pH was measured.

 Table 4-5
 Methodologies for Water Quality Monitoring of Stormwater discharge

Parameter	Methodology
Suspended Solids (S.S.)	APHA 2540D
Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	APHA 5210B
Chemical Oxygen Demand (COD)	Hach Method 8000
Oil & Grease	APHA 5520B

Sulphur Content in Bio Heating Oil

- 4.7 According to Section 3.11 of the EP-319/2009/D, if Bio Heating Oil (BHO) is used on site, every tank load of the sulphur content in BHO shall be tested when the fuel tank(s) is being filled/refilled for the first three months. After the first three months of the above monitoring regime, the permit holder may reduce the monitoring frequency to one test for every two refills for the next three months. And after the first six months, the monitoring may be conducted once a month. In case when the BHO sulphur contents monitored during the above mentioned monitoring exceeds the 346 ppm threshold in any test, the permit holder shall revert the monitoring programme back to starting from the original plan of a test for every tank load of BHO or at such a monitoring frequency to be advised and agreed by the Director.
- 4.8 Since no exceedance was reported in the first three month, sulphur content in BHO shall be tested once for every two refills.
- 4.9 In July 2016, BHO in the tank was sampled once. Its sulphur content was then analyzed in accordance with EN-ISO-20486:2011: Determination of sulfur content of automotive fuels Ultraviolet fluorescence method.

5 MONITORING RESULTS

Air Quality

Emission from Stack of Boiler

5.1 The monitoring results of the emission from the stack of boiler are presented in Table5-1. No exceedance of Limit Level was reported. Detailed monitoring result of the emission from the stack of boiler is presented in Appendix A.

Table 5-1	Monitoring Result of the Emission from the Stack of Boiler
-----------	--

Parameter	Limit Level	Monitoring Result*
Nitrogen oxides (NO _X)	2.213 kg/h	0.55 kg/h
Carbon monoxide (CO)	0.553 kg/h	<0.2 kg/h
Sulphur dioxide (SO ₂)	0.797 kg/h	<0.03 kg/h
Non-methane Organic Compounds (NMOC)	0.041 kg/h	0.0355 kg/h
Exhaust gas velocity	7 m/s (minimum)	11.625 m/s
* Average result of all trials is presented		

Emission from Stack of Biogas Flare

- 5.2 The monitoring results of the emission from the stack of biogas flare are presented in **Table 5-2**. Detailed monitoring result of the emission from the stack of biogas flare is presented in **Appendix B**.
- 5.3 Three exceedances of Limit Level were reported. The exceedances of CO and NMOC are considered due to incomplete combustion, while the exceedance of SO_2 is considered due to high sulphur content in the Biogas feedstock. Details of the investigation is presented in **Appendix J**.

Table 5-2Monitoring Result of the Emission from the Stack of Biogas Flare

Parameter	Limit Level	Monitoring Result*
Nitrogen oxides (NO _X)	0.053 kg/h	<0.03 kg/h
Carbon monoxide (CO)	0.018 kg/h	0.0585 kg/h **
Sulphur dioxide (SO ₂)	0.039 kg/h	0.095 kg/h **
Non-methane Organic Compounds (NMOC)	0.0018 kg/h	0.005 kg/h **
Exhaust gas velocity	0.54 m/s (minimum)	1.375 m/s
* Average result of all trials is presented ** Exceedance of Limit Level		

Emission from Stack of Process Building

- 5.4 The monitoring results of the emission from the stack of process building are presented in **The exceedance** is considered due to incomplete combustion. Details of the investigation is presented in **Appendix J**.
- 5.5 **Table 5-3**. Detailed monitoring result of the emission from the stack of process building is presented in **Appendix C**.
- 5.6 One exceedance of Limit Level was reported. The exceedance is considered due to incomplete combustion. Details of the investigation is presented in **Appendix J**.

Parameter	Limit Level	Monitoring Result*
Acetyldehyde	0.0975 kg/h	<0.001 kg/h
Methanol	0.0975 kg/h	0.12 kg/h **
Exhaust gas velocity	0.79 m/s (minimum)	2.85 m/s
* Average result of all trials is presented		

Odour Concentrations at the Final Air Scrubber

5.7 The monitoring result of the odour concentrations at the final air scrubber is presented in Table 5-4. No exceedance of Limit Level was reported. Detailed monitoring result of the odour concentrations at the final air scrubber is presented in Appendix D.

Table 5-4Monitoring Result of the Odour Concentrations at the Final Air
Scrubber

Parameter	Limit Level	Monitoring Result*
Odour	200.3 OU/s	31.45 OU/s
Exhaust gas velocity	0.7 m/s (minimum)	1.24 m/s
* Average result of all trials is presented		

Odour Patrols along Site Boundary

5.8 The monitoring result of the odour patrol is presented in **Table 5-5**. No exceedance of Action and Limit Levels was reported. Detailed monitoring result of odour patrols along site boundary is presented in **Appendix E**.

Patrol	Lagation	Odour Intensity		
Time	Location	Action Level	Limit Level	Measured Level (Odour Nature)
	1			0~1 (Oil and grease)
	2			1 (Oil and grease)
Morning	3		Odour intensity ≥Class 2 recordedOdour intensity ≥Class 3 recorded on 2 consecutive patrols	0
	4	intensity ≥Class 2		0
	5			0
	1			0
	2			1 (Oil and grease)
Afternoon	3			0~1 (Oil and grease)
	4			0
	5			0

Table 5-5Monitoring Result of Odour Patrols along Site Boundary

Water Quality

Water Quality of Treated Effluent Discharged from Project Site

5.9 The water quality monitoring result of treated effluent discharged from Project Site is presented in **Table 5-6**. No exceedance of Limit Level was reported. Detailed water quality monitoring result of treated effluent discharged from Project Site is presented in **Appendix F**.

Table 5-6Water Quality Monitoring Result of Treated Effluent Discharged from
Project Site

Parameter	Limit Level	Monitoring Result
pH	Within the range of 6 - 10	8.63
Suspended Solids	800 mg/L	214 mg/L
Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	800 mg/L	210 mg/L
Chemical Oxygen Demand (COD)	2000 mg/L	377 mg/L
Oil & Grease	50 mg/L	42 mg/L
Sulphate	1000 mg/L	20 mg/L
Total Nitrogen	200 mg/L	150 mg/L
Total Phosphorus	50 mg/L	10 mg/L

Water Quality of Stormwater Discharge

5.10 The water quality monitoring result of stormwater discharge is presented in **Table 5-7**. No exceedance of Limit Level was reported. Detailed water quality monitoring result of treated effluent discharged from Project Site is presented in **Appendix G**.

Table 5-7Water Quality Monitoring Result of Stormwater Discharge

Parameter	Limit Level	Monitoring Result
pH	Within the range of 6 - 9	7.50
Suspended Solids	50 mg/L	38 mg/L
Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	50 mg/L	50 mg/L
Chemical Oxygen Demand (COD)	100 mg/L	60 mg/L
Oil & Grease	30 mg/L	<10 mg/L

Sulphur Content in Bio Heating Oil

- 5.11 The monitoring result of sulphur content in Bio Heating Oil (BHO) is presented in **Table 5-8**. Detailed monitoring result of sulphur content in Bio Heating Oil is presented in **Appendix H**.
- 5.12 One exceedance of Limit Level is reported. Details of the investigation is presented in Appendix J.

Table 5-8Monitoring Result of Sulphur Content in Bio Heating Oil

Sampling Date	Limit Level	Monitoring Result
21 July 2016	346 ppm	573 ppm

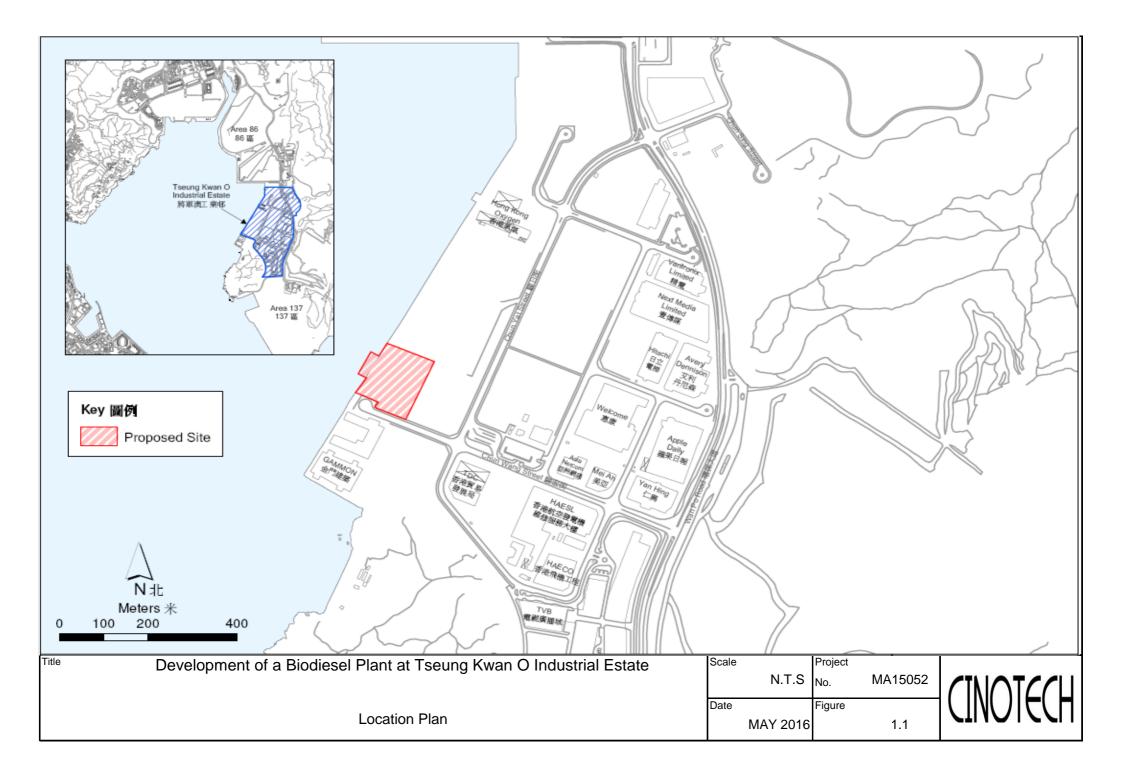
6 SUMMARY OF COMPLAINT AND PROSECUTION

- 6.1 No environmental related complaint, prosecution or notification of summon was received in July 2016.
- 6.2 There was no environmental complaint, prosecution or notification of summons received since the commencement of Project (operational phase). The Complaint Log is attached in **Appendix I**.

7 CONCLUSIONS

- 7.1 In July 2016, environmental monitoring and audit works were carried out in accordance with criteria and requirements listed in the Project EM&A Manual, Environmental Permit EP-319/2009D, Specified Process Licence L-25-019(1) and Water Pollution Control Ordinance Licence WT00022972-2015.
- 7.2 Monitoring of air quality, water quality and sulphur content in Bio Heating Oil were carried out at designated locations. 3 exceedances of Limit Levels were recorded at the stack of biogas flare, 1 exceedance of Limit Level was recorded at the stack of process building and 1 exceedance of Limit Level was recorded in the sulphur content of Bio Heating Oil. Investigation for the exceedance events was carried out, and measures were recommended to counter the exceedance events.
- 7.3 No environmental related complaint, prosecution or notification of summon was received.

FIGURES



APPENDIX A Air Quality Monitoring Report – Emission from Stack Of Boiler



ALS Technichem (HK) Pty Ltd 11/F, Chung Shun Knitting Centre 1-3 Wing Yip Street Kwai Chung, N.T., Hong Kong I +852 2610 1044 <u>F</u> +852 2610 2021

STACK GAS SAMPLING AND LABORATORY TESTING REPORT

Location: ASB Biodiesel (Hong Kong) Ltd

Sampling Period: 25th to 26th July, 2016

ALS Work Order No: HK1627909 Amendment 1

Report Issue Date: 24th August, 2016

CLIENT: ASB Biodiesel (Hong Kong) Ltd PREPARED BY:

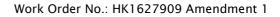
No. 22, Chun Wang Street, Tseung Kwan O Industrial Estates, N.T., Hong Kong Tel: 852-3741-1640 Fax: 852-3183-4200

Mr Fung Lim Chee, Richard General Manager - Hong Kong

This is the Final Report and supersedes any preliminary report with this batch number.

Results apply to sample(s) as submitted. All pages of this report have been checked and approved for release.

This report may not be reproduced except with prior written approval from ALS Technichem (HK) Pty Ltd.





1 Summary of Work

The document is the final report for the stack gas sampling and testing events in ASB Biodiesel (Hong Kong) Ltd.

Sampling Period:	25 th to 26 th July, 2016
Location of Stack:	Tseung Kwan O Industrial Estates
No. of Stack:	1
Name of Stack:	Boiler (EP2)

1.1 Method for Stack Sampling and Analysis

Parameter	USEPA Method Reference
Velocity / Volumetric Flow Rate	Method 2
Nitrogen / Oxygen / Carbon Dioxide	Method 3
Moisture Content	Method 4
Sulphur Dioxide (SO ₂)	Method 6
Nitrogen Oxides (NO _x)	Method 7C
Carbon Monoxide (CO)	Method 10B
Non-Methane Organic Compounds (NMOC)	Method TO-12
Respirable Suspended Particulates (PM ₁₀)	Method 201A

1.2 Sampling Time

Each gas sample, except carbon monoxide and non-methane organic compounds, was covered for at least 1 hour.

For the measurement of carbon monoxide and non-methane organic compounds, the sampling was last for at least 30 minutes.



2 Sampling Summary

2.1 Nitrogen Oxides (NO_x)

USEPA Method 7C will be used for sampling and testing of nitrogen oxides (NO₂) sample. Stack gas with nitrogen oxides (NO₂) analyte will be collected from the centroid of the stack into impinger contains absorption solution (alkaline potassium permanganate solution) via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed colorimetrically.

2.2 Sulphur Dioxide (SO₂)

USEPA Method 6 will be used for sampling and testing of sulphur dioxide (SO₂) sample. Stack gas with sulphur dioxide (SO₂) analyte will be collected from the centroid of the stack into impinger contains absorption solution (3 percent H2O2 solution) via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the ion chromatography method.

2.3 Carbon Monoxide (CO)

USEPA Method 10B will be used for sampling and testing of carbon monoxide (CO) sample. Stack gas with carbon monoxide (CO) analyte will be collected from the centroid of the stack into a Tedlar Bag via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the gas chromatography flame ionization detection (GC/FID).

2.4 Non-Methane Organic Compounds (NMOC)

USEPA Method TO-12 will be used for sampling and testing of Non-Methane Organic Compounds (NMOC) sample. Stack gas with Non-Methane Organic Compounds (NMOC) analyte will be collected from the centroid of the stack into a 6L Canister via regulated gas sampler.

The sampling period will last for around 30 mins to collect sufficient sample for laboratory analysis. The duration depends on the stack condition such as pressure, temperature. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the gas chromatography flame ionization detection (GC/FID), the result of NMOC will be reported as "propane".

2.5 Respirable Suspended Particulates (PM₁₀)

USEPA Method 201A will be used for sampling and testing of Respirable Suspended Particulates (PM10) sample. The Respirable Suspended Particulates sample shall be collected at a predetermined constant flow rate through an instack sizing device with filter paper, a glass-made probe, and a series of impingers containing distilled water absorbing solution at different traverse points along the two sampling port axis as required in the USEPA Method 1& 2. The particulate content shall be determined gravimetrically in laboratory.



3 Sampling Period and Stack Parameter

3.1 Sampling Period

Test Parameter	Trial 1	Trial 2
Sulphur Dioxide (SO ₂)	25 th July,2016 14:16 - 15:16	26 th July,2016 11:35 - 12:35
Nitrogen Oxides (NOx)	25 th July,2016 15:22 - 16:22	26 th July,2016 09:50 - 10:50
Respirable Suspended Particulates (PM ₁₀) and Total Particulates (PM _{total})	25 th July,2016 17:05 - 18:35	26 th July,2016 12:55 - 14:26
Carbon Monoxide (CO) & Non-Methane Organic Compounds (NMOC)	25 th July,2016 16:25 - 16:55	26 th July,2016 10:58 - 11:28

3.2 Stack Parameter

Test Parameter	Trial	Sampling Volume (m³)[1]	Stack Gas Temperature (°C)	Stack Gas Velocity (m/s)	Minimum Flow Rate (m³/hr) ^[1]	Moisture Content (%)
50	1	0.055	177	13	9282	12.5
SO ₂	2	0.058	172	10	7220	9.4
NO	1	0.026	179	13	9251	12.5
NO _x	NO	0.025	174	11	8288	9.4
PM ₁₀ &	1	0.881	175	10	7691	12.5
	2	0.882	164	8	7194	9.4
СО	1	0.0087	176	12	9746	12.5
	2	0.0087	174	11	7756	9.4
NMOC	1	0.006	176	12	9746	12.5
	2	0.006	174	11	7756	9.4

Note:

[1]: Results expressed as at 0 degree Celsius temperature, 101.325 kilopascals pressure, without correction for water vapour or oxygen content.



4 Result 4.1 Boiler (EP2)

	Unit	LOR	Result ^[1]		
Test Parameter			Trial 1	Trial 2	
	ppmv	2	33	28	
Nitrogen Oxides (NO) Incl. Nitrogen Dioxide & Nitrogen Oxide ^[2]	mg/m³	5	67	58	
a Millogen Oxide	kg/hr ^{[4] [5]}	0.05	0.62	0.48	
	ppmv	10	<10	<10	
Carbon Monoxide (CO)	mg∕m³	13	<13	<13	
	kg/hr ^{[4] [5]}	0.2	<0.2	<0.2	
	ppmv	1.0	<1.0	<1.0	
Sulphur Dioxide (SO ₂)	mg∕m³	2.0	<2.0	<2.0	
	kg/hr ^{[4] [5]}	0.03	<0.03	<0.03	
	ppmv	0.2	11.7	2.4	
Non-Methane Organic Carbon (NMOC) ^[3]	mg/m³	0.1	6.3	1.3	
	kg/hr ^{[4] [5]}	0.001	0.061	0.010	
Respirable Suspended	mg/m³	5.0	<5.0	<5.0	
Particulates (PM ₁₀)	kg/hr ^{[4] [5]}	0.05	<0.05	<0.05	
Total Particulates	mg/m³	5.0	<5.0	<5.0	
(PM _{total})	kg/hr ^{[4] [5]}	0.05	<0.05	<0.05	

Note:

[1]: Results expressed as at 0 degree Celsius temperature, 101.325 kilopascals pressure, without correction for water vapour or oxygen content. The introduction of dilution air to achieve the limit is not allowed.

- [2]: Results expressed as nitrogen dioxide.
- [3]: Results expressed as carbon.
- [4]: The LOR of the emission rate (kg/hr) is calculated based on the minimum flow rate among the 2 sampling trials.
- [5]: The emission rate (kg/hr) is calculated based on the minimum flow rate during sampling.
- LOR: Laboratory Reporting Limit

APPENDIX B Air Quality Monitoring Report – Emission from Stack of Biogas Flare



ALS Technichem (HK) Pty Ltd 11/F, Chung Shun Knitting Centre 1-3 Wing Yip Street Kwai Chung, N.T., Hong Kong <u>T</u>+852 2610 1044 <u>F</u>+852 2610 2021

STACK GAS SAMPLING AND LABORATORY TESTING REPORT

Location: ASB Biodiesel (Hong Kong) Ltd

Sampling Period: 27th July, 2016

ALS Work Order No: HK1627911

Report Issue Date: 18th August, 2016

CLIENT: ASB Biodiesel (Hong Kong) Ltd PREPARED BY:

No. 22, Chun Wang Street, Tseung Kwan O Industrial Estates, N.T., Hong Kong Tel: 852-3741-1640 Fax: 852-3183-4200

Mr Fung Lim Chee, Richard General Manager - Hong Kong

This is the Final Report and supersedes any preliminary report with this batch number.

Results apply to sample(s) as submitted. All pages of this report have been checked and approved for release.

This report may not be reproduced except with prior written approval from ALS Technichem (HK) Pty Ltd.



1 Summary of Work

The document is the final report for the stack gas sampling and testing events in ASB Biodiesel (Hong Kong) Ltd.

Sampling Period:27th July, 2016Location of Stack:Tseung Kwan O Industrial EstatesNo. of Stack:1Name of Stack:Biogas Flare (EP1)

1.1 Method for Stack Sampling and Analysis

Parameter	USEPA Method Reference		
Velocity / Volumetric Flow Rate	Method 2		
Sulphur Dioxide (SO ₂)	Method 6		
Nitrogen Oxides (NO) Incl. Nitrogen Dioxide & Nitrogen Oxide	Method 7C		
Carbon Monoxide (CO)	Method 10B		
Non-Methane Organic Compounds (NMOC)	Method TO-12		

1.2 Sampling Time

Each gas sample, except carbon monoxide and non-methane organic compounds, was covered for at least 1 hour.

For the measurement of carbon monoxide and non-methane organic compounds, the sampling was last for at least 30 minutes.



2 Sampling Summary

2.1 Sulphur Dioxide (SO₂)

USEPA Method 6 will be used for sampling and testing of sulphur dioxide (SO₂) sample. Stack gas with sulphur dioxide (SO₂) analyte will be collected from the centroid of the stack into impinger contains absorption solution (3 percent H_2O_2 solution) via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the ion chromatography method.

2.2 Nitrogen Oxides (NO_x)

USEPA Method 7C will be used for sampling and testing of nitrogen oxides (NOx) sample. Stack gas with nitrogen oxides (NO_x) analyte will be collected from the centroid of the stack into impinger contains absorption solution (alkaline potassium permanganate solution) via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed colorimetrically.

2.3 Carbon Monoxide (CO)

USEPA Method 10B will be used for sampling and testing of carbon monoxide (CO) sample. Stack gas with carbon monoxide (CO) analyte will be collected from the centroid of the stack into a Tedlar Bag via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the gas chromatography flame ionization detection (GC/FID).

2.4 Non-Methane Organic Compounds (NMOC)

USEPA Method TO-12 will be used for sampling and testing of Non-Methane Organic Compounds (NMOC) sample. Stack gas with Non-Methane Organic Compounds (NMOC) analyte will be collected from the centroid of the stack into a 6L Canister via regulated gas sampler.

The sampling period will last for around 30 mins to collect sufficient sample for laboratory analysis. The duration depends on the stack condition such as pressure, temperature. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the gas chromatography flame ionization detection (GC/FID), the result of NMOC will be reported as "propane".



3 Sampling Period and Stack Parameter

3.1 Sampling Period

Test Parameter	Trial 1	Trial 2	
Sulphur Dioxide (SO ₂)	27 th July,2016 16:20 - 17:20	27 th July,2016 19:15 - 20:15	
Nitrogen Oxides (NO _x)	27 th July,2016 15:14 - 16:14	27 th July,2016 18:08 - 19:08	
Carbon Monoxide (CO)	27 th July,2016 14:32 - 15:02	27 th July,2016 17:22 - 17:52	
Non-Methane Organic Compounds (NMOC)	27 th July,2016 14:32 - 15:02	27 th July,2016 17:22 - 17:52	

3.2 Stack Parameter

Test Parameter	Trial	Sampling Volume (m³)[1]	Average Stack Gas Temperature (°C)	Average Stack Gas Velocity (m/s)	Average Stack Gas Volume Flow Rate (m ³ /hr) ^[1]
Sulphur Dioxide (SO ₂)	1	0.0561	226	0.9	1284
	2	0.0567	302	1.9	2392
Nitrogen Oxides (NO _x)	1	0.0251	229	0.9	1215
	2	0.0233	315	1.9	2286
Carbon Monoxide (CO)	1	0.0084	210	0.8	1168
	2	0.0085	339	1.9	2242
Non-Methane Organic Compounds (NMOC)	1	0.006	210	0.8	1168
	2	0.006	339	1.9	2242

Note:

[1]: Expressed as 0 deg. C, 101.325 kilopascal pressure.



4 Result

4.1 Biogas Flare (EP1)

Test	Unit	LOR	Resi	ult ^[1]
Parameter	Unit	LOK	Trial 1	Trial 2
	ppmv	1	10.5	22.2
Sulphur Dioxide (SO ₂)	mg/m³	2	30	63
	kg/hr ^[4]	0.01	0.038	0.152
	ppmv	2	<2	<2
Nitrogen Oxides (NO _x) ^[2]	mg/m³	5	<5	<5
	kg/hr ^[4]	0.03	<0.03	<0.03
	ppmv	10	51	15
Carbon Monoxide (CO)	mg/m³	13	64	19
(/	kg/hr ^[4]	0.015	0.075	0.042
Non-Methane	ppmv	0.2	9.3	3.5
Organic Compounds	mg/m³	0.1	5.0	1.9
(NMOC) ^[3]	kg/hr ^[4]	0.0004	0.0058	0.0042

Note:

[1]: Results expressed as at 0 degree Celsius temperature, 101.325 kilopascals pressure, without correction for water vapour or oxygen content. The introduction of dilution air to achieve the limit is not allowed.

[2]: Results expressed as nitrogen dioxide.

[3]: Results expressed as carbon.

[4]: The LOR of the emission rate (kg/hr) is calculated based on the minimum flow rate among the 2 sampling trials.

LOR: Laboratory Reporting Limit.

APPENDIX C Air Quality Monitoring Report – Emission from Stack of Process Building



ALS Technichem (HK) Pty Ltd 11/F, Chung Shun Knitting Centre 1-3 Wing Yip Street Kwai Chung, N.T., Hong Kong <u>T</u>+852 2610 1044 <u>F</u>+852 2610 2021

STACK GAS SAMPLING AND LABORATORY TESTING REPORT

Location: ASB Biodiesel (Hong Kong) Ltd

Sampling Period: 26th July, 2016

ALS Work Order No: HK1627902

Report Issue Date: 18th August, 2016

CLIENT: ASB Biodiesel (Hong Kong) Ltd **PREPARED BY:**

No. 22, Chun Wang Street, Tseung Kwan O Industrial Estates, N.T., Hong Kong Tel: 852-3741-1640 Fax: 852-3183-4200

Mr Fung Lim Chee, Richard General Manager - Hong Kong

This is the Final Report and supersedes any preliminary report with this batch number.

Results apply to sample(s) as submitted. All pages of this report have been checked and approved for release.

This report may not be reproduced except with prior written approval from ALS Technichem (HK) Pty Ltd.



1 Summary of Work

The document is the final report for the stack gas sampling and testing events in ASB Biodiesel (Hong Kong) Ltd.

Sampling Period:	26 th July, 2016
Location of Stack:	Tseung Kwan O Industrial Estates
No. of Stack:	1
Name of Stack:	Process Building Outlet (EP3)

1.1 Method for Stack Sampling and Analysis

Parameter	USEPA Method Reference
Velocity / Volumetric Flow Rate	Method 2
Acetaldehyde	Method TO-11A
Methanol	Method TO-14A

1.2 Sampling Time

The sampling time of each gas sample was covered for at least 1 hour.

2 Sampling Summary

2.1 Acetaldehyde

USEPA Method TO-11A will be used for sampling and testing of Acetaldehyde sample. Stack gas with Acetaldehyde analyte will be collected from the centroid of the stack into DNPH-coated silica gel cartridges via regulated gas sampler. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the liquid chromatography with ultraviolet (UV) detection.

2.2 Methanol

USEPA Method TO-14A will be used for sampling and testing of Methanol sample. Stack gas with Methanol analyte will be collected from the centroid of the stack into a 6L Canister via regulated gas sampler.

The sampling period will last for around 60 mins to collect sufficient sample for laboratory analysis. The duration depends on the stack condition such as pressure, temperature. Sample will be delivered to ALS Hong Kong Laboratory and analysed by the gas chromatography flame ionization detection (GC/FID).



3 Sampling Period and Stack Parameter

3.1 Sampling Period

Test Parameter	Trial 1	Trial 2
Acetaldehyde	26 th July,2016 14:00 - 15:00	26 th July,2016 15:10 - 16:10
Methanol	26 th July,2016 14:00 - 15:00	26 th July,2016 15:10 - 16:10

3.2 Stack Parameter

Test Parameter	Trial	Sampling Volume (m³) ^[1]	Stack Gas Temperature (°C)	Stack Gas Velocity (m/s)	Stack Gas Volume Flow Rate (m³/hr) ^[1]
Acataldabyda	1	0.0548	56.3	2.8	148
Acetaldehyde	2	0.0548	54.7	2.9	154
Mathemal	1	0.006	56.3	2.8	148
Methanol	2	0.006	54.7	2.9	154

Note:

[1]: Expressed as 0 deg. C, 101.325 kilopascal pressure.



4 Result

4.1 Process Building Outlet (EP3)

Test			Res	ult ^[1]
Parameter	Unit	LOR	Trial 1	Trial 2
	ppmv	2.5	<2.5	<2.5
Acetaldehyde	mg/m³	5	<5	<5
kg/hr	kg/hr	1x10 ⁻³	<1x10 ⁻³	<1x10 ⁻³
	ppmv	50	1109	62
Methanol	mg/m³	70	1584	89
	kg/hr	0.01	0.23	0.01

Note:

[1]: Results expressed as at 0 degree Celsius temperature, 101.325 kilopascals pressure, without correction for water vapour or oxygen content. The introduction of dilution air to achieve the limit is not allowed.

LOR: Laboratory Reporting Limit

APPENDIX D Air Quality Monitoring Report – Odour Measurement at Final Air Scrubber

Technological and Higher Education Institute of Hong Kong 香港高等科技教育學院

THEi Building, 20A Tsing Yi Road, Tsing Yi Island, New Territories, Hong Kong 香港新界青衣島青衣路20A號 香港高等科技教育學院大樓 www.thei.edu.hk

Telephone No 電話

Our Reference 本院檔號

Facsimile No 傳真

Your Reference 來函檔號



Member of VTC Group VTC 機構成員

For ASB Biodiesel (Hong Kong) Limited

Odour Measurement at ASB Biodiesel Plant

8 August 2016

By Odour Research Centre

Faculty of Science and Technology Technological and Higher Education Institute of Hong Kong

(Member of VTC Group)

1. Background

An odour assessment service was required by ASB Biodiesel (Hong Kong) Limited to collect odour samples at the final air scrubber and to conduct laboratory olfactometry analysis with the European Standard Method (EN13725).

2. Scope of the Work

The scope of the work is:

One sampling location was previously identified by the client. A total of two odour samples need to be collected at final air scrubber per month for a period of one year and the monthly report need to be submitted to the client.

- . to collect two odour samples at the final air scrubber and deliver the collected samples to laboratory for olfactometry analysis on 8 August 2016.
- . to conduct laboratory olfactometry analysis to determine the odour concentration of the collected odour samples;
- . to calculate the odour emission rate at the final air scrubber;
- . to prepare an analytical report.

3. Methodology

3.1 Odour Sampling

Odour gas sample is collected by a Sampling Device Standard consists of a vacuum container, which is evacuated by a vacuum pump. The sampling point and the standard sampler are connected by a probe. Due to the evacuation in the sampling device, the sample bag, inside the device, sucks in sample air via the probe. During this process, none of its components come into contact with the sample air due to the construction of the sampling device.



Odour Sampling System

3.2 Odour Measurement by Olfactometry

Odour concentration is determined by a Dynamic Olfactometer (TO9) in accordance with the European Standard Method (EN13725). This European Standard specifies a method for the objective determination of the odour concentration of a gaseous sample using dynamic olfactometry with human assessors and the emission rate of odours emanating from point sources, area sources with outward flow and area sources without outward flow. This European Standard is applicable to the measurement of odour concentration of pure substances, defined mixtures and undefined mixtures of gaseous odorants in air or nitrogen, using dynamic olfactometry with a panel of human assessors being the sensor. The unit of measurement is the odour unit percubic metre: OU_E/m^3 . The odour concentration is measured by determining the dilution factor required to reach the detection threshold. The odour concentration at the detection threshold is defined as 1 OU_E/m^3 . The odour concentration is then expressed in terms of multiples of the detection threshold. The range of measurement is typically from $2^2 OU_E/m^3$ to $2^{17} OU_E/m^3$ (excluding pre-dilution).



Olfactometer

3.3 Determination of Odour Emission Rate

The odour emission rate (OER) at the final air scrubber can be calculated by the following equation:

OER (ou/s) = Odour concentration (ou/m³) x Cross section area of outlet (m²) x Outlet gas flow velocity (m/s).

4. Odour Sampling and Olfactometry Measurement

4.1 Sampling Activities

The odour sampling works was conducted on 8 August 2016 at the final air scrubber. A total of two odour samples were collected on the site and delivered to the Odour Research Centre of THEi immediately.

During the odour sampling, the wind speed was measured on the outlet of final air scrubber. The location description and sampling condition are summarized in Table 1.

Table 1: Summary of sampling condition and results for olfactometry measurement

Location ID	Location description	Date	Time	Туре	a (m ²)	V (m/s)	OC (OU _E /m ³)	OER (ou/s)
1	Final air scrubber	8 August 2016	11:05	Α	0.0962	1.24	280	33.4
2	Final air scrubber	8 August 2016	11:10	А	0.0962	1.24	247	29.5

Remark: A: Ambient sampling; a: Cross section area of final air scrubber; V: Gas flow velocity from final air scrubber; OC: Odour concentration; OER: Odour emission rate from final air scrubber.

4.2 Olfactometry Measurement and Analytical Results

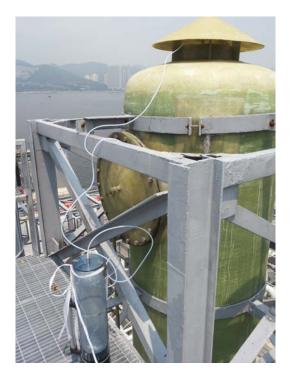
A total of two odour samples were tranported to the Odour Research Centre of THEi. The olfactometry analysis was conducted within 24 hours after the sampling work using a dynamic olfactometer in accordance with the European Standard Method (EN13725). Four qualified panellists participated in the odour testing session, who were previously selected through a set of screening tests using a certified n-butanol gas (60 ppm/v) as a standard reference.

According to the odour concentration determined for each sample, the odour emission rates at the final air scrubber were calculated as follows:

OER (ou/s) = Odour concentration (ou/m³) x Cross section area of outlet (m²) x Outlet gas flow velocity (m/s).

The analytical results of odour concentrations and odour emission rateare summarized in Table 1.

The photo about the on-site sampling activity at the final air scrubber is presented below,



Final air scrubber



Final air scrubber

Prepared by:

P

KH NG

Signed:



Odour Research Centre at THEi

APPENDIX E Air Quality Monitoring Report – Odour Patrol

Technological and Higher Education Institute of Hong Kong 香港高等科技教育學院

THEi Building, 20A Tsing Yi Road, Tsing Yi Island, New Territories, Hong Kong 香港新界青衣島青衣路20A號 香港高等科技教育學院大樓 www.thei.edu.hk

Telephone No 電話

Our Reference 本院檔號

Facsimile No 傳真

Your Reference 來函檔號



Member of VTC Group VTC 機構成員

For ASB Biodiesel (Hong Kong) Limited

Odour Patrol at ASB Biodiesel Plant

5 July 2016

By Odour Research Centre

Faculty of Science and Technology Technological and Higher Education Institute of Hong Kong

(Member of VTC Group)

1. Background

An odour patrol survey was required by ASB Biodiesel (Hong Kong) Limited to determine the odour intensity of ambient air at the boundary of ASB Biodiesel Plant during its operation period of the morning and the afternoon on 5 July 2016.

2. Scope of the Work

The scope of the work is:

This field odour survey includes the daily monitoring by a qualified odour panelist from THEi to record the instant weather conditions, to determine odour intensity and also to identify odour natures at each of five locations along with the boundary of the ASB Biodiesel Plant. The odour patrol exercise should be conducted two times per month for a period of one year and the monthly report need to be submitted to the client.

3. Methodology

- 3.1 The odour patrol means a simple judgment by observers patrolling and sniffing at the boundary of the ASB Biodiesel Plant to detect any odour at different time within operating hours.
- 3.2 One qualified odour panelist with his individual thresholds (n-butanol) complied with the requirement of the European Standard Method (EN13725) in the range of 20 to 80 ppb/v and a standard deviation of R < 2.3 should be selected to conduct the odour patrol work.
- 3.3 The panelist should be free from any respiratory diseases and normally do not work at or live in the area in the vicinity of the ASB Biodiesel Plant.
- 3.4 During each visit, the instant weather conditions should be measured using a portable environment anemometer (Lutron LM-8000) and recorded for references.
- 3.5 During odour patrol, the panelist should indentify the odour nature and determine the odour intensity at each location. The odour intensity can be expressed using an odour intensity scale, which is a verbal description of an odour sensation to which a numerical value is assigned at five different levels according to the following criteria:

0	Not detected	No odour perceived or an odour so week that it can not be easil characterised or described
1	Slight	Identifiable odour, slight
2	Moderate	Identifiable odour, moderate
3	Strong	Identifiable, strong
4	Extreme	Severe odour

4. Odour Patrol Survey

- 4.1 Prior to the on-site odour survey, a site visit was conducted by an odour technician from the Odour Research Centre of THEi together with the staff from ASB Biodiesel (Hong Kong) Limited. During the site visit, five locations at the boundary of ASB Biodiesel Plant were identified for the odour patrol survey and are clearly marked in Figure 1.
- 4.2 One qualified odour panelist from THEi was selected as an observer to conduct the odour patrol, who participated in a set of screening tests using a certified n-butanol gas with their individual thresholds (n-butanol) complied with the requirement of the European Standard Method (EN13725) in the range of 20 to 80 ppb/v and a standard deviation of R < 2.3.
- 4.3 The odour patrol survey was conducted in the morning and the afternoon on 5 July 2016.
- 4.4 During each survey, the odour panelist recorded the weather conditions including prevailing weather, wind direction and wind speed, determined the odour intensity and also indentified the odour nature at each location.
- 4.5 Some photos about odour patrol activities at different locations are presented below:









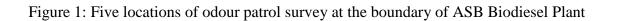
4

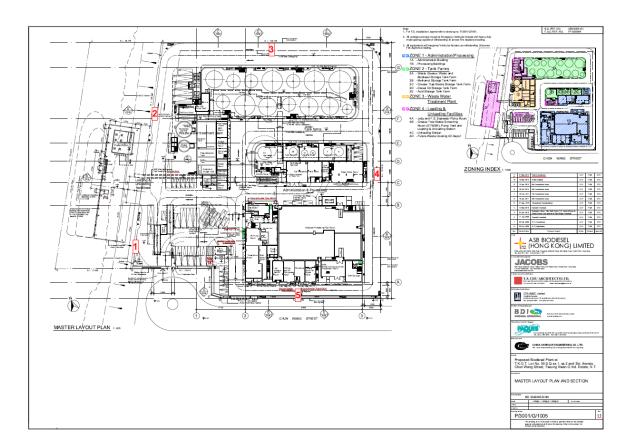


4.6 All odour patrol data and findings in two trips on 5 July 2016 are summarized in Table 1 as shown below:

				Win	d	Odour	Observations
Date	Location	Time	Weather	Speed (m/s)	Direction	Intensity	Odour Nature
5 July. 2016	1	10:16	Cloudy	1.3	Е	0~1	Oil and Grease
	2	10:20		0.9	Е	1	Oil and Grease
	3	10:24		1.5	Е	0	
	4	10:29		2.7	Е	0	
	5	10:33		0.8	Е	0	
	1	12:10	Cloudy	0.6	E-SE	0	
	2	12:13		0.7	E-SE	1	Oil and Grease
	3	12:17		1.0	E-SE	0~1	Oil and Grease
	4	12:21		1.5	E-SE	0	
	5	12:24		0.3	E-SE	0	

Table 1: Summary of odour patrol survey data and findings





Prepared by:

KH NG

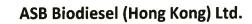
Signed:





P

APPENDIX F Water Quality Monitoring Result – Effluent from Wastewater Treatment Plant





No.	S301-20160714-0900
Date :	18 July, 2016
Page :	1 of 1

×

TEST REPORT

SAMPLE DESCRIPTION	:	Stream 1, Water Pollution Control Ordinance (CAP. 358) Licence No.: WT00022972-2015
SAMPLE RECEIVED DATE	:	14 July, 2016
TESTING DATE	:	14 – 18 July, 2016
TEST RESULT	:	

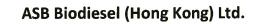
TEST	METHOD	UNIT	RESULT
рН	/	/	8.63
TCOD	HACH Method 8000	mg/L	377
Sulfate	HACH Method 10248	mg/L	20
Total Nitrogen (as N)	HACH Method 10071	mg/L	150
Total Phosphorous (as P)	HACH Method 8190	mg/L	10
Total Suspended Solid	APHA 2540 D	mg/L	214
Oil & Grease	APHA 5520 B	mg/L	42
BOD ₅	APHA 5210 B	mg/L	210

For and on behalf of ASB BIODIESEL (HONG KONG) LTD

Authorized Signature

ASB Biodiesel (Hong Kong) Ltd. No.22 Chun Wang Street, Tseung Kwan O Industrial Estate, New Territories, Hong Kong.

APPENDIX G Water Quality Monitoring Result – Stormwater Discharge





No.	ŝ	SP2-20160725-0900
Date :		29 July, 2016
Page :	1) }}	1 of 1

TEST REPORT

SAMPLE DESCRIPTION	:	SP2, Water Pollution Control Ordinance (CAP. 358) Licence No.: WT00022972-2015
SAMPLE RECEIVED DATE	:	25 July, 2016
TESTING DATE	÷	25-29, July 2016
TEST RESULT	•	

TEST	METHOD	UNIT	RESULT	
рН	/	/	7.50	
TCOD	HACH Method 8000	mg/L	60	
Total Suspended Solid	APHA 2540 D	mg/L	38	
Oil & Grease	APHA 5520 B	mg/L	<10	
BOD ₅	APHA 5210 B	mg/L	50	

For and on behalf of ASB BIODIESEL (HONG KONG) LTD

BIO mn

Authorized Signature

ASB Biodiesel (Hong Kong) Ltd. No.22 Chun Wang Street, Tseung Kwan O Industrial Estate, New Territories, Hong Kong.

APPENDIX H Test Result – Sulphur Content in Bio Heating Oil



- : T21-20160721-0900 No
- : 18 August, 2016 Date
- Page :1 of 1

TEST REPORT

SAMPLE DESCRIPTION	: Bio Heating Oil, Tank 21
SAMPLE RECEIVED DATE	: 21 July, 2016
TESTING DATE	: 21 July, 2016
TEST RESULT	:

UNIT RESULT TEST METHOD mg/kg Sulphur EN ISO 20846: 2011 573

For and on behalf of

ASB BIODIESEL (HONG KONG) LTD

Dibio

Authorized Signature

APPENDIX I Complaint Log

APPENDIX I – COMPLAINT LOG

Reporting Month: July 2016

Log Ref.	Location	Received Date	Details of Complaint Investigation/Vlitigation Action		Status
N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

Remarks: No environmental complaint was received.

APPENDIX J Investigation Report of Environmental Quality Limit Exceedances (July 2016)



Address: 5/F, Winning Commercial Building, 46-48 Hillwood Road, Tsim Sha Tsui, Kowloon Tel: 852 - 3168 2028 Fax: 852 - 3168 2022

Subject:	Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate Investigation Report for the exceedance event in July 2016			
Job No.	D1067	Total Pages:	1	
From:	Mr. Mark Cheung	Ref:	D1067/L06652	
Attn:	Mr. H. T. Lai	Fax:	3107 1388	
To:	Cinotech	Date:	20 October 2016	

Dear Sir,

We refer to your submission of the Investigation Report for the exceedance event in July 2016 via email dated 14 October 2016.

We write to advise that we have no comment on the captioned report.

However, it is noted that the incident of exceedance of limit level keeps happening. You are advised to investigate the incidents in detail and propose appropriate remedial measures to make sure the limit level will not be exceeded. Please promptly implement such measures and keep tracking on the effectiveness of the proposed measures.

Regards,

Mark Cheung Independent Environmental Checker

KTC/gk

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate - Investigation Report of Environmental Quality Limit Exceedances

Monitoring Month: July 2016

Part A – Exceedance Summary Table

Station	Parameter	Action Level (kg/hr)	Limit Level (kg/hr)	Monitoring Result **	Justification	Validity (Yes/No)
Stack of Biogas Flare (EP1)	Carbon monoxide (CO)		0.018 kg/h	<u>0.0585 kg/h</u>	(1)	Yes
	Sulphur dioxide (SO ₂)	N.A. *	0.039 kg/h	<u>0.095 kg/h</u>	(2)	Yes
	Non-methane Organic Compounds (NMOC)		0.0018 kg/h	<u>0.005 kg/h</u>	(1)	Yes
Process Building Outlet (EP 3)	Methanol	N.A. *	0.0975 kg/h	<u>0.12 kg/h</u>	(3)	Yes
Bio Heating Oil	Sulphur Content	N.A. *	346 ppm	<u>573 ppm</u>	(4)	Yes

* No Action Level was set in the Final EM&A Manual of the Project / in the latest Environmental Permit granted

** Bold Italic means Action Level exceedance; Bold Italic with underline means Limit Level exceedance

*** Justification: (1) After investigation, both exceedances of CO and NMOC were due to incomplete combustion.

(2) After investigation, the exceedance of SO_2 was due to high sulphur content in the Biogas feedstock, which is mainly originated from the wastewater treatment plant.

(3) After investigation, the exceedance of methanol was due to insufficient water in scrubber for methanol removal.

(4) After investigation, although the sulphur content in Bio Heating Oil exceeds limit level, the current practice is to mix Bio Heating Oil and Ultra-low-sulphur diesel (sulphur content less than 5 ppm) in 1:1 ratio before use. Therefore, the maximum sulphur content of the fuel mixture will be = (573 + 5)ppm/2 = 289 ppm, which complies the requirement (a fuel mixture with sulphur content of less than 346 ppm) stated in Section 3.11 of the Environmental Permit EP-319/2009/D.

Part B – Conclusion: The exceedances were due to the Project, and therefore measures recommended in Part C shall be implemented.

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate - Investigation Report of Environmental Quality Limit Exceedances

Part C – Recommendation: As the exceedance was caused by the Project, recommended follow-up investigations are as follow:

- (a) Identify for any unacceptable practice; and
- (b) Investigate whether the current practice need to be amended or not.

<u>Regarding the exceedance of CO and NMOC from the Stack of Biogas Flare (EP1), no unacceptable practice was identified during the follow-up investigation. After reviewing the fuel-air ratio for combustion, the fuel ratio should be decreased for complete combustion. Therefore, biogas will be fed into the biogas flare in a slower rate for combustion.</u>

Regarding the exceedance of SO_2 from the Stack of Biogas Flare (EP1), no unacceptable practice was identified during the follow-up investigation. Follow-up investigation pointed out that the excessive SO_2 in the Biogas flare was originated from hydrogen sulfide (H₂S). An air scrubber is recommended to be installed to remove H₂S in biogas prior to combustion.

Regarding the exceedance event from the Stack of Process Building Outlet (EP3), no unacceptable practice was identified during the follow-up investigation. Nevertheless, the follow-up investigation pointed out that the trigger level of the Low Level Alarm at the control valve (which controls water flowing into the Process Building Scrubber) was too low (10 kg/h). In order to prevent the same incident in the future, the trigger levels of the Low Level Alarm and the Low Level Alarm have been increased to 30 kg/h and 40 kg/h respectively. This ensures sufficient water for methanol removal.

<u>Regarding the exceedance of the sulphur content in Bio Heating Oil, no unacceptable practice was identified during the follow-up investigation. Since the current practice complies the requirement stated in Section 3.11 of the Environmental Permit EP-319/2009/D (refers **Part A – Exceedance Summary Table** for details), no rectification is required.</u>