ASB Biodiesel (Hong Kong) Limited

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate

Monthly EM&A Report
April 2019
(Version 1.0)

Certified By (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

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Our Ref: D1067_Q02906

15 May 2019

By Fax (3107 1388)

CINOTECH Consultants Limited Rm 1710, Technology Park, 18 On Lai Street, Shatin, New Territories, Hong Kong

For the attention of Ms. Karina CHAN

Dear Madam,

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate - Operation Phase

IEC Certification on Draft Monthly EM&A Report (April 2019)

We refer to your submission of the draft monthly EM&A report (April 2019 – v1.0) via email dated 10 May 2019.

We write to advise that we have no adverse comment on the capioned report. We have also checked and confirmed that the last monthly EM&A reports had been submitted within 10 working days after the end of the reporting month.

Please note that 2 complaints made in 18 March 2019 and 25 April 2019 have been received. We hereby remind you to keep tracking on the conditions of the equipment in order to avoid the recurrence of exceedance event.

Yours faithfully

For and on behalf of Mannings (Asia) Consultants Ltd

Mark CHEUNG

Independent Environemental Checker

KTC/SC/as

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EXECUTIVE SUMMARY

Introduction

1. This is the 37th 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 April 2019.

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(2), granted on 19 July 2018 &
 - Water Pollution Control Ordinance Licence, WT00029932-2017, granted on 22 December 2017.

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.
- 4. Since the plant was shut down for maintenance in April 2019, monitoring on emission from stack of biogas flare, stacks of boiler and process buildings were suspended. The monitoring for the above emission point will be resumed in May 2019.

Key Information in the Reporting Month

5. Summary of key information in this reporting month (April 2019) is listed in **Table I**.

Table I Summary of Key Information in April 2019

Event	Event Details		Action Taken	Status	Remark	
Event	Number	Nature	Nature Action Taken		Kemark	
Exceedance of Action & Limit Levels	2	Action level for complaints received on odour	Investigation has commenced	On-going	Details/Result s of Investigation report will be provided in the next monthly EMA report.	
Complaint received	Complaint received 2 Odour		Investigation has commenced	On-going	Details/Result s of Investigation report will be provided in the next monthly EMA report.	
Changes to the assumptions and key construction / operation activities recorded	0		N/A	N/A		
Status of submissions under EP	1	Monthly EM&A Reports: Mar 2019 v1.0	Submitted to EPD on 14 Apr 2019	Verified by IEC		
Notifications of any summons & prosecutions	0		N/A	N/A		

1 INTRODUCTION

Background

- 1.1 ASB Biodiesel Plant (hereafter referred to as "the Plant") was established in 2013 for the production of biodiesel and crude glycerine using cooking oil (UCO) and grease trap waste (GTW). The plant is located at Tseung Kwan O Industrial Estate (see **Figure 1.1** for the location plan of Project Site) and are able to produce 100,000 tonnes of low-carbon fuel per year for selling to both local and overseas market. The plant uses multifeedstock which consists of UCO, oil and grease recovered from GTW, palm fatty acid distillate (PFAD) and animal fats. The 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.
 - 1.2 This Project is a Designated Project under the Environmental Impact Assessment 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 Plant has been completed since November 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 37th Monthly EM&A report summarizing the EM&A works in operational phase for the Project in April 2019.

Project Organizations

- 1.5 Different parties with different levels of involvement in the project organization include:
 - Project Proponent & Operator –
 ASB Biodiesel (Hong Kong) Limited
 - Independent Environmental Checker (IEC) Mannings (Asia) Consultants Ltd.
 - Environmental Team (ET) Cinotech Consultants Limited
- 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**.

Table 1-1 Key Project Contacts

Party	Role	Name	Position	Phone No.
4.07	Permit Holder &	Mr. Martin Hui	Production Manager	3183 4338
ASB	Operator	Ms. Elaine Wong	Sustainable Devolvement Officer	3183 4306
Mannings	Independent Environmental	Mr. Mark Cheung	Independent Environmental Checker	3168 2028
Mannings	Checker	Mr. Ares Siu	Assistant to Independent Environmental Checker	3588 8513
Cinotech	Environmental			2151 2088
	Team	Ms. Karina Chan	Project Coordinator	2157 3880

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;
 - Monitoring requirements as listed in the Specified Process (SP) Licence granted; &
 - Monitoring requirements as listed in the Water Pollution Control Ordinance (WPCO) Licence granted

2 STATUS OF ENVIRONMENTAL LICENSING AND PERMITTING

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

Table 2-1 Summary of Environmental Licensing and Permit Status

D N-	Valid	Period	C	C404			
Permit / License No.	From	To	Summary	Status			
Environmental Permi	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-25-019(2)	19/07/2018	18/07/2020	Emission of non-fugitive fixed point emissions	Valid			
L-25-019(1)	10/10/2013	10/10/2015	Emission of non-fugitive fixed point emissions	Expired on 10/10/2015			
Water Pollution Cont	rol Ordinance	(WPCO) Licen	ce				
WT00029932-2017	22/12/2017	31/12/2019	Discharge of effluent from wastewater treatment facilities to communal foul sewer; and effluent from floor washing of operation areas to communal storm drain	Valid			
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	Expired on 31/12/2017			

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**.

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

Stack	Frequency *	Parameter	Limit Levels**
		Nitrogen oxides (NO _X)	2.213 kg/h
		Carbon monoxide (CO)	0.553 kg/h
		Sulphur dioxide (SO ₂)	0.797 kg/h
Boiler (EP2)		Non-methane Organic Compounds (NMOC)	0.041 kg/h
(212)		Respirable suspended particulates	0.111 kg/h
	Once per month.	Odour	2,400 OU/s
		Exhaust gas velocity	10.00 m/s (minimum)
		NO _X	0.053 kg/h
Biogas		СО	0.018 kg/h
Flare		SO_2	0.039 kg/h
(EP1)		NMOC	0.0018 kg/h
		Exhaust gas velocity	0.54 m/s (minimum)
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 3-2 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		Odour		28.6 OU/s
Concentrations at the Final Air Scrubber (EP5)	Once per month.*	Exhaust gas velocity	_ **	0.70 m/s (minimum)
Odour Patrols along the Project Site Boundary	 Two times a day, one in the morning and one in the afternoon Twice a month for the licence period; and If the action level is triggered, the frequency will be increased to three times a month until compliance with the action level for three consecutive months is obtained and the frequency will be resumed to twice a month thereafter. 	Odour Intensity	 Odour intensity ≥ Class 2 recorded; or One documented complaint received 	• Odour intensity ≥ Class 3 recorded on 2 consecutive patrols
* Monitoring will no	t be carried out during raining days			

- 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**.

^{**} No action level was set in the Final EM&A Manual of the Project and in the Specified Process Licence

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

T		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 effectiveness of 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		

II-vord	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**.

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

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	Monthly	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	
		Chemical Oxygen Demand (COD)	100 mg/L	
		Oil & Grease	30 mg/L	
* No action level was set in the WPCO Licence				

- 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

	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	Contractor on the possible	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 Sulphur Content in Bio 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 Stack of Boiler

4.1 Since the boiler was shut down for maintenance during April 2019, monitoring on emission from the stacks was suspended in April 2019 and will be resumed in May 2019.

Emission from Stack of Biogas Flare

4.2 Since the plant was shut down for maintenance during April 2019, monitoring on emission from the stacks of biogas flare was suspended in April 2019 and will be resumed in May 2019.

Emission from Stack of Process Building

4.3 Since the process building was shut down for maintenance during April 2019, monitoring on emission from the process building was suspended in April 2019 and will be resumed in May 2019.

Odour Concentrations at the Final Air Scrubber

4.4 Gas in the final air scrubber was sampled and analyzed. Method adopted for analysis is listed in **Table 4-1**. In addition to parameter listed in **Table 4-1**, exhaust gas velocity was measured. Detailed methodology for odour monitoring in the final air scrubber is presented in **Appendix D**.

Table 4-1 Methodology for Monitoring of Odour Concentrations at the Final Air Scrubber

Parameter	Methodology
Odour concentration	European Standard Method (EN13725)

Odour Patrols along Site Boundary

4.5 Odour patrols were carried out by a qualified odour panelist in both morning and afternoon on 3rd & 24th April 2019. 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

4.6 Treated effluent discharged from Project Site was sampled and analyzed. Methodologies for water quality monitoring 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 4-2**. In addition to the parameters listed in **Table 4-2**, pH was measured.

Table 4-2 Methodologies for Water Quality Monitoring of Treated Effluent Discharged from Project Site

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

Water Quality of Stormwater Discharge

4.7 As water quality of stormwater discharge is required to be monitored quarterly, next monitoring will be carried out in June 2019. No monitoring was carried out in April 2019.

Sulphur Content in Bio Heating Oil

4.8 In April 2019, BHO in the tank was sampled once. Its sulphur content was then analyzed in accordance with EN-ISO-20486:2011: Determination of sulphur content of automotive fuels – Ultraviolet fluorescence method.

5 MONITORING RESULTS

Air Quality

Emission from Stack of Boiler

- 5.1 Emission from stack of boiler was not monitored in April 2019 (see **Section 4.1** for details).
- 5.2 The monitoring result of the emission from the stack of boiler in March is presented in **Table 5-1.** No exceedance of the limit level was recorded in March 2019.

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

Parameter	Limit Level	Monitoring Result*		
Nitrogen oxides (NO _X)	2.213 kg/h	1.56 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	<0.002 kg/h		
Exhaust gas velocity	10 m/s (minimum)	17.95 m/s		
* Average result of all trials is presented				

5.3 Detail monitoring result of the emission from the stack of boiler in March is presented in **Appendix A.**

Emission from Stack of Biogas Flare

5.4 Emission from stack of biogas flare was not monitored in April 2019 (see **Section 4.2** for details).

Emission from Stack of Process Building

5.5 Emission from process building was not monitored in April 2019 (see **Section 4.3** for details).

Odour Concentrations at the Final Air Scrubber

5.6 The monitoring result of the odour concentrations at the final air scrubber is presented in **Table 5-2**. 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 5-1 Monitoring Result of the Odour Concentrations at the Final Air Scrubber

Parameter	Limit Level	Monitoring Result*
Odour	28.6 OU/s	3.86 OU/s
Exhaust gas velocity	0.7 m/s (minimum)	0.9 m/s
* Average result of all trials is presented		

Odour Patrols along Site Boundary

- 5.7 The monitoring result of the odour patrol is presented in **Table 5-2**. No exceedance of the Limit Level was reported. However 2 complaints were received in March and April and therefore the action levels have been exceeded in March and April 2019, according to Event and Action Plan as summarized in **Table 3-3**, the monitoring frequency should be increased to three times per month until the action levels of the odour intensity in May, June and July 2019 are compiled.
- 5.8 Detailed monitoring result of odour patrols along site boundary is presented in **Appendix E**.

Table 5-2 Monitoring Result of Odour Patrols along Site Boundary

		Odour Intensity			
Patrol Time	Location	Action Level	Limit Level	Measured Level on 3 rd Apr 2019 (Odour Nature)	Measured Level on 24 th Apr 2019 (Odour Nature)
	1			0	0
	2	Odour intensity ≥Class 2 recorded; or One documented complaint	intensity >Class 2 ecorded; or One One One One One One One One One On	0	1 (Oil and grease)
Morning	3			0	1 (Oil and grease)
	4			1 (Oil and grease)	1 (Oil and grease)
	5			0	0
	1			1 (Oil and grease)	0
	2		Consecui	consecutive patrols	1 (Oil and grease)
Afternoon	3	received		0	0
	4			1 (Oil and grease)	1 (Oil and grease)
	5			0	1 (Oil and grease)

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 5-3**. 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 5-3 Water Quality Monitoring Result of Treated Effluent Discharged from Project Site

Parameter	Limit Level	Monitoring Ro	esult
pН	Within the range of 6 - 10	8.08	N/A
Chemical Oxygen Demand (COD)	2000 mg/L	340	mg/L
Sulphate	1000 mg/L	460	mg/L
Total Nitrogen	200 mg/L	18.2	mg/L
Total Phosphorus	50 mg/L	45	mg/L
Suspended Solids	800 mg/L	240	mg/L
Oil & Grease	50 mg/L	36	mg/L
Biochemical Oxygen Demand (BOD) (5 days, 20 °C)	800 mg/L	30	mg/L

Water Quality of Stormwater Discharge

5.10 Water quality of stormwater discharge was not monitored in April 2019 (see **Section 4.7** for details).

Sulphur Content in Bio Heating Oil

5.11 The monitoring result of sulphur content in Bio Heating Oil (BHO) is presented in **Table 5-5**. No exceedance of Limit Level was reported. Detailed monitoring result of sulphur content in Bio Heating Oil is presented in **Appendix H**.

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

Sampling Date	Limit Level	Monitoring Result
22 April 2019	346 ppm	298 ppm

6 SUMMARY OF COMPLAINT AND PROSECUTION

6.1 A total of 2 environmental related complaints made in March 2019 and April 2019 were received in this reporting month for Details are tabulated in **Table 6-1**.

Table 6-1 Complaint Details

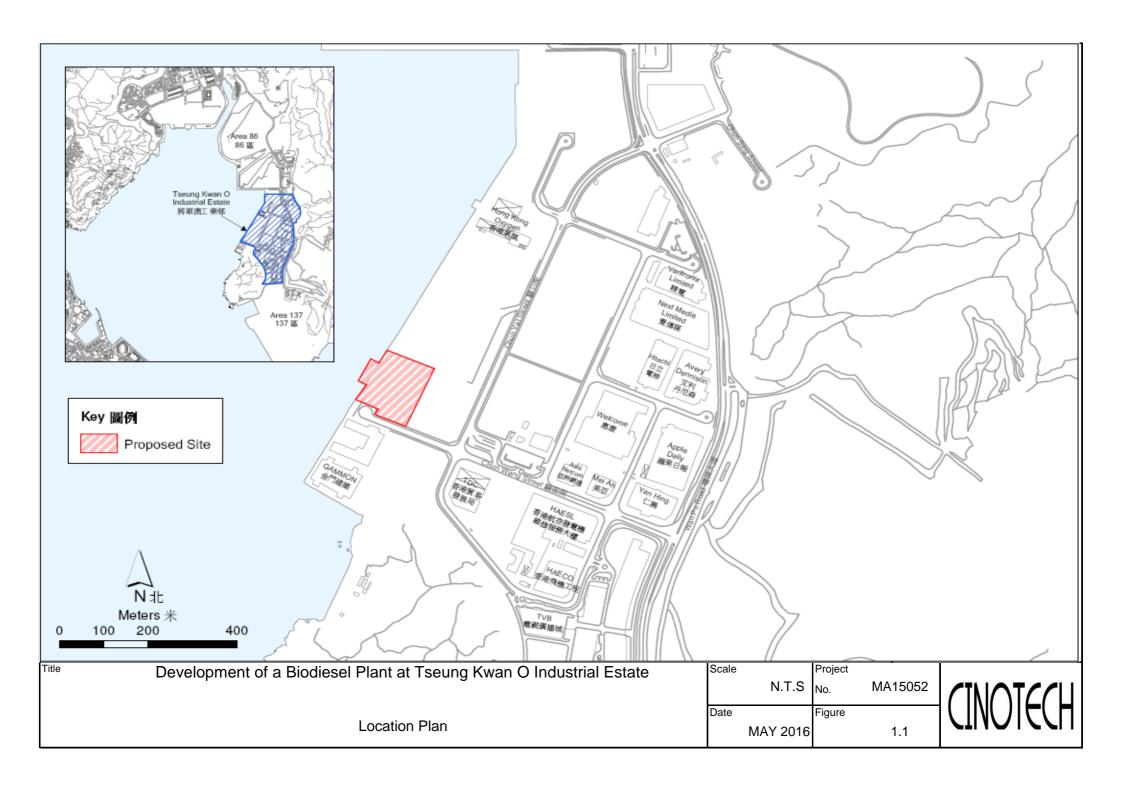
Complaint No.	Date	Complaint Details	Investigation
COM- 2019-03- 18	18/03/2019	EPD referred a complaint in which the complainant stated that malodor was detected at Plant in Tseung Kwan O Industrial Estate on 18 Mar 2019. The complainant stated that malodor has adversely affected their mental and physical health. And the problem have not been solved since the previous complaints were made.	Investigation is still ongoing, details and results of the investigation will be supplemented in the next monthly EMA report.
COM- 2019-04- 19	25/4/2019	EPD referred a complaint in which the complainant stated that malodor was detected at Chun Wan Street, near Gammon construction site on 24 April 2019. The complainant suspected that the odour was occurred as a result of not clearing the wastewater in ASB frequent enough. The southeasterly winds also brought the malodor to LOHAS park.	Investigation has commenced, details and results of the investigation will be supplemented in the next monthly EMA report.

6.2 In total, 19 environmental complaints, 6 notifications of summons, and 5 successful prosecutions were received since the operation of Project. The Complaint Log is attached in **Appendix I**.

7 CONCLUSIONS

- 7.1 In April 2019, 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(2) and Water Pollution Control Ordinance Licence WT00029932-2017.
- 7.2 Monitoring of air quality, water quality and sulphur content in Bio Heating Oil were carried out at designated locations. No exceedance of the Action and Limit Levels were recorded. Since the plant was shut down for maintenance in April 2019, monitoring on emission from stack of biogas flare, stacks of boiler and process buildings were suspended. The monitoring for the above emission points will be resumed in May 2019.
- 7.3 2 Complaints made in 18 March 2019 and 25 April 2019 were received in this reporting month. And all investigations are still on-going.

FIGURES



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



廠商會檢定中心

TEST REPORT

Report No.	: AY0019760(1)	Date: 15 Apr 2019
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Application No. : LY008767(6)

Applicant : ASB BIODIESEL (HONG KONG) LTD.

22 CHUN WANG STREET,

TSEUNG KWAN O INDUSTRIAL ESTATE

NEW TERRITORIES, HONG KONG

Project Name : Stack gas measurement on Tseung Kwan O Biodiesel Plant for

ASB Biodiesel (Hong Kong) Ltd.

Sampling Point : Boiler – EP2.

Sampling Date : 26 Mar 2019.

Test Requested : 1. Velocity / Volumetric Flow Rate;

2. Respirable Suspended Particulates (RSP);

3. Sulphur Dioxide (SO₂);

4. Carbon monoxide (CO);
5. Nitrogan evides (NO);

5. Nitrogen oxides (NO_x);

6. Non-Methane Organic Compounds (NMOC).

Methodology : Refer to pages 2.

Test Result : Refer to pages 3 to 4.

For and on behalf of

CMA Industrial Development Foundation Limited

Authorized Signature : Lau Yan Kin

Senior Manager

Page 1 of 4

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TEST REPORT

Report No. : AY0019760(1) Date: 15 Apr 2019

Application No. : LY008767(6)

Methodology

Respirable Suspended Particulates – USEPA Method 201A

The stack emission test for measuring RSP emission was carried out by using an Isokinetic Stack Sampling System in accordance with the Reference Method 201A of the United States Environmental Protection Agency ["USEPA"]. Extract a sample of gas at a predetermined constant flow rate through an in-stack sizing device. The particle-sizing device separates particles of RSP. After a sample is obtained, remove uncombined water from the particulate, and then use gravimetric analysis to determine the particulate mass for each size fraction.

Sulphur Dioxide – USEPA Method 6

The stack emission test for measuring SO_2 concentration was carried out by using an Isokinetic Stack Sampling System in accordance with the Reference Method 6 of USEPA. Stack flue gas was extracted into the sampling system and SO_2 in the flue gas was absorbed in 3% hydrogen peroxide solution and then measured by barium-thorin titration method. Concentration of SO_2 in flue gas was then determined from the mass of SO_2 obtained and gas volume extracted similarly to that for PM.

Carbon Monoxide - USEPA Method 10B

CO level was determined using USEPA Reference Method 10B. Stack gas sample was extracted into a Tedlar Bag and analysised by gas chromatography flame ionization detector (GC/FID).

Nitrogen Oxides – USEPA Method 7C

NOx concentration was determined using USEPA Reference Method 7C. Stack flue gas sample was extracted and then collected in alkaline-potassium permanganate solution. The NOx in the gas sample would then be oxidized to nitrate and nitrite. The nitrate would in turn be reduced to nitrite with cadmium and the total nitrite was then analyzed colorimetrically, giving the mass of NOx obtained. The NOx concentration was then determined from the mass of NO₂.

Non-Methane Organic Compounds – USEPA Method TO12

This was made by sampling the stack flue gas with Tedlar Bag and then analyzed by Gas Chromatography. The amount of organic substance was expressed as carbon.

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TEST REPORT

Report No. : AY0019760(1) Date: 15 Apr 2019

Application No. : LY008767(6)

Sampling Schedule :

Domomoton	Ti	rial
Parameter	1	2
RSP	26 Mar 2019, 10:12 – 11:12	26 Mar 2019, 11:35 – 12:35
SO_2	26 Mar 2019, 13:00 – 14:00	26 Mar 2019, 14:17 – 15:17
CO	26 Mar 2019, 10:12 – 11:12	26 Mar 2019, 11:35 – 12:35
NO _x	26 Mar 2019, 12:55 – 13:55	26 Mar 2019, 14:10 – 15:10
NMOC	26 Mar 2019, 10:12 – 11:12	26 Mar 2019, 11:35 – 12:35



廠商會檢定中心

TEST REPORT

Report No. : AY0019760(1) Date: 15 Apr 2019

Application No. : LY008767(6)

Results:

Parameter	Unit	Tr	rial
Farameter	Omt	1	2
Average Stack Gas Velocity (RSP)	m/s	19.3	19.3
Average Stack Gas Velocity (SO ₂)	III/S	17.9	18.0
Average Stack Gas Temperature (RSP)	°C	222	222
Average Stack Gas Temperature (SO ₂)	C	222	224
RSP	mg/dscm	<5	<5
RSP	kg/hr	< 0.09	< 0.09
SO_2	mg/dscm	<2	<2
$5O_2$	kg/hr	< 0.03	< 0.03
CO	ppmv	<10	<10
СО	kg/hr	< 0.2	< 0.2
NO as NO	mg/dscm	108	107
NO _x as NO ₂	kg/hr	1.56	1.54
NMOC as Carbon	mg/dscm	<0.1	<0.1
INIVIOC as Carbon	kg/hr	< 0.002	< 0.002

Note: 1. dscm means dry standard cubic meter, which is corrected to temperature of 273 K and a pressure of 101.3 kilopascals (1atm).

2. "<" denotes less than.

***** End of Report *****

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



TEST REPORT

Report No. : AY0016456(0) Date : 24 April 2019

Application No. : LY007011(9)

For ASB Biodiesel (Hong Kong) Limited

Odour Measurement at the final air scrubber in ASB Biodiesel Plant

For and on behalf of

CMA Industrial Development Foundation Limited

Authorized Signature: Page 1 of 8

KH Ng

Principle Consultant

Odour Testing Laboratory – Environmental Division

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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 (EN 13725).

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 24 April 2019;
- . 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

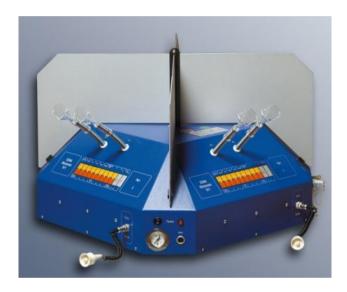
Page 2 of 8

Tel: (852) 2698 8198 Fax: (852) 2695 4177 E-mail: info@cmatesting.org Web Site: http://www.cmatesting.org



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 24 April 2019 at the final air scrubber. A total of two odour samples were collected on the site and delivered to the Odour Testing Laboratory of CMA Testing and Certification Laboratories (CMA) immediately.

During the odour sampling, the wind speed was measured on the outlet of final air scrubber. The Page 3 of 8

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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 /m³)	OER (ou/s)
1	Final air scrubber	24 April 2019	11:10	A	0.0962	0.90	47	4.07
2	Final air scrubber	24 April 2019	11:15	A	0.0962	0.90	42	3.64

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 transported to the Odour Testing Laboratory of CMA. 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 (50 ppm/v) as a standard reference. The certificates for the qualified odour panel members are provided in Appendix A.

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_E/m³) x Cross section area of outlet (m²) x Outlet gas flow velocity (m/s).

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

The photos about the on-site sampling activity at the final air scrubber are presented below,



Final air scrubber



Final air scrubber

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Appendix A: Certificates for the qualified odour panel members

Certificate for a Qualified Odour Panel Member

Qualified Odour Panel Member: Mr. Dickson Wong

This is to certify that Mr. Dickson Wong participated in a set of n-butanol screening tests in our laboratory between 4 March 2019 and 8 March 2019.

His odour threshold of n-butanol in nitrogen gas was found to be in the range of 20-80 ppb/v and a standard deviation of R < 2.3. According to the requirement of the European Standard Method of Air Quality – Determination of Odour Concentration by Dynamic Olfactometry (EN 13725), he is qualified to participate olfactometry analysis to determine odour concentration.

Signed for and on behalf of CMA Industrial Development Foundation Limited

KH Ng

Principle Consultant

Odour Testing Laboratory - Environmental Division

Date: 8 March 2019

Page 5 of 8



Certificate for a Qualified Odour Patrol Panel Member

Qualified Odour Panel Member: Mr. Tommy Ng

This is to certify that Mr. Tommy Ng participated in a set of n-butanol screening tests and odour intensity in our laboratory between 11 March 2019 and 15 March 2019.

His odour threshold of n-butanol in nitrogen gas was found to be in the range of 20-80 ppb/v and a standard deviation of R < 2.3, which comply with the requirement of the European Standard Method of Air Quality – Determination of Odour Concentration by Dynamic Olfactometry (EN 13725). His odour intensity tests complied with the requirement of a Hong Kong 4- point Scale System according to the requirement of ASTM E544-99.

Signed for and on behalf of CMA Industrial Development Foundation Limited

KH Ng

Principle Consultant

Odour Testing Laboratory - Environmental Division

Date: 15 March 2019



Certificate for a Qualified Odour Panel Member

Qualified Odour Panel Member: Mr. Andy Gao

This is to certify that Mr. Andy Gao participated in a set of n-butanol screening tests in our laboratory between 4 March 2019 and 8 March 2019.

His odour threshold of n-butanol in nitrogen gas was found to be in the range of 20 - 80 ppb/v and a standard deviation of R < 2.3. According to the requirement of the European Standard Method of Air Quality – Determination of Odour Concentration by Dynamic Olfactometry (EN13725), he is qualified to participate olfactometry analysis to determine odour concentration.

Signed for and on behalf of CMA Industrial Development Foundation Limited

KH Ng

Principle Consultant

Odour Testing Laboratory - Environmental Division

Date: 8 March 2019



Certificate for a Qualified Odour Panel Member

Qualified Odour Panel Member: Miss. Caroline Ng

This is to certify that Miss. Caroline Ng participated in a set of n-butanol screening tests in our laboratory between 4 March 2019 and 8 March 2019.

Her odour threshold of n-butanol in nitrogen gas was found to be in the range of 20 - 80 ppb/v and a standard deviation of R < 2.3. According to the requirement of the European Standard Method of Air Quality – Determination of Odour Concentration by Dynamic Olfactometry (EN 13725), she is qualified to participate olfactometry analysis to determine odour concentration.

Signed for and on behalf of CMA Industrial Development Foundation Limited

KH Ng

Principle Consultant

Odour Testing Laboratory - Environmental Division

Date: 8 March 2019

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APPENDIX E Air Quality Monitoring Report – Odour Patrol



TEST REPORT

Report No. : AY0016455(0) Date : 24 April 2019

Application No. : LY007011(9)

For ASB Biodiesel (Hong Kong) Limited

Odour Patrol at ASB Biodiesel Plan

For and on behalf of

CMA Industrial Development Foundation Limited

Authorized Signature: Page 1 of 6

KH Ng

Principle Consultant

Odour Testing Laboratory – Environmental Division

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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 24 April 2019.

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 CMA Testing and Certification Laboratories (CMA) 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 (EN 13725) 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 identify 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 easily 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 a qualified odour panelist from the Odour Testing Centre of CMA together with the staff from ASB Biodiesel (Hong Kong) Limited. During the site

Page 2 of 6



廠商會檢定中心

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 CMA 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 (EN 13725) in the range of 20 to 80 ppb/v and a standard deviation of R < 2.3. His odour intensity tests complied with the requirement of a Hong Kong 4- point Scale System according to the requirement of ASTM E544-99.
- 4.3 The odour patrol survey was conducted in the morning and the afternoon on 24 April 2019.
- 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 The illustrations about odour patrol activities at different locations are presented below:









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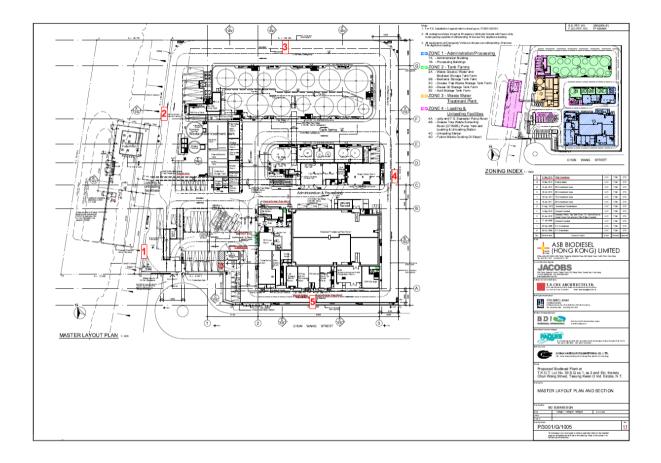
4.6 All odour patrol data and findings in two trips on 24 April 2019 are summarized in Table 1 as shown below:

Table 1: Summary of odour patrol survey data and findings

				Win	d	Odour	Observations
Date	Location	Time	Weather	Speed (m/s)	Direction	Intensity	Odour Nature
24 April 2019	1	10:45	Cloudy	1.0	S	0	
	2	10:48		2.5	S	1	Oil and Grease
	3	10:53		1.9	S	1	Oil and Grease
	4	10:58		1.1	S	1	Oil and Grease
	5	11:03		0.7	S	0	
	1	12:00	Cloudy	0.7	S	0	
	2	12:03		2.8	S	1	Oil and Grease
	3	12:08		0.5	S	0	
	4	12:11		2.6	S	1	Oil and Grease
	5	12:16		0.6	S	1	Oil and Grease



Figure 1: Five locations of odour patrol survey at the boundary of ASB Biodiesel Plant





Appendix A: Certificate for the qualified odour panel member

Certificate for a Qualified Odour Patrol Panel Member

Qualified Odour Panel Member: Mr. Tommy Ng

This is to certify that Mr. Tommy Ng participated in a set of n-butanol screening tests and odour intensity in our laboratory between 11 March 2019 and 15 March 2019.

His odour threshold of n-butanol in nitrogen gas was found to be in the range of 20-80 ppb/v and a standard deviation of R < 2.3, which comply with the requirement of the European Standard Method of Air Quality – Determination of Odour Concentration by Dynamic Olfactometry (EN 13725). His odour intensity tests complied with the requirement of a Hong Kong 4- point Scale System according to the requirement of ASTM E544-99.

Signed for and on behalf of CMA Industrial Development Foundation Limited

KH Ng

Principle Consultant

Odour Testing Laboratory - Environmental Division

Date: 15 March 2019

Page 6 of 6



TEST REPORT

Report No. : AY0016454(9) Date : 3 April 2019

Application No. : LY007011(9)

For ASB Biodiesel (Hong Kong) Limited

Odour Patrol at ASB Biodiesel Plan

For and on behalf of

CMA Industrial Development Foundation Limited

Authorized Signature: Page 1 of 6

KH Ng

Principle Consultant

Odour Testing Laboratory – Environmental Division

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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 3 April 2019.

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 CMA Testing and Certification Laboratories (CMA) 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 (EN 13725) 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 identify 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 easily 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 a qualified odour panelist from the Odour Testing Centre of CMA together with the staff from ASB Biodiesel (Hong Kong) Limited. During the site

Page 2 of 6



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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 CMA 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 (EN 13725) in the range of 20 to 80 ppb/v and a standard deviation of R < 2.3. His odour intensity tests complied with the requirement of a Hong Kong 4- point Scale System according to the requirement of ASTM E544-99.
- 4.3 The odour patrol survey was conducted in the morning and the afternoon on 3 April 2019.
- 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 The illustrations about odour patrol activities at different locations are presented below:









Page 3 of 6



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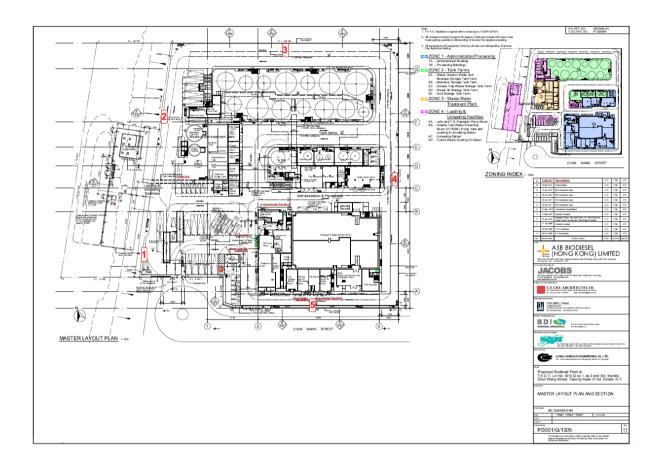
4.6 All odour patrol data and findings in two trips on 3 April 2019 are summarized in Table 1 as shown below:

Table 1: Summary of odour patrol survey data and findings

				Win	d	Odour	Observations
Date	Location	Time	Weather	Speed (m/s)	Direction	Intensity	Odour Nature
3 April 2019	1	11:33	Fine	3.7	NE	0	
	2	11:36		3.1	NE	0	
	3	11:39		0.8	NE	0	
	4	11:42		1.5	NE	1	Oil and Grease
	5	11:45		1.7	NE	0	
	1	12:01	Fine	1.1	Е	1	Oil and Grease
	2	12:04		1.9	Е	1	Oil and Grease
	3	12:08		3.4	Е	0	
	4	12:11		2.6	Е	1	Oil and Grease
	5	12:14		2.2	Е	0	



Figure 1: Five locations of odour patrol survey at the boundary of ASB Biodiesel Plant





Appendix A: Certificate for the qualified odour panel member

Certificate for a Qualified Odour Patrol Panel Member

Qualified Odour Panel Member: Mr. Terry Wong

This is to certify that Mr. Terry Wong participated in a set of n-butanol screening tests and odour intensity in our laboratory between 4 March 2019 and 8 March 2019.

His odour threshold of n-butanol in nitrogen gas was found to be in the range of 20 - 80 ppb/v and a standard deviation of R < 2.3, which comply with the requirement of the European Standard Method of Air Quality - Determination of Odour Concentration by Dynamic Olfactometry (EN13725). His odour intensity tests complied with the requirement of a Hong Kong 4- point Scale System according to the requirement of ASTM E544-99.

Signed for and on behalf of CMA Industrial Development Foundation Limited

KH Ng

Principle Consultant

Odour Testing Laboratory - Environmental Division

Date: 8 March 2019

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APPENDIX F

Water Quality Monitoring Result – Effluent from Wastewater Treatment Plant



ASB Biodiesel (Hong Kong) Ltd.

No. : \$301-20190422-0900

Date : 26 April, 2019

Page : 1 of 1

TEST REPORT

SAMPLE DESCRIPTION : Stream 1, Water Pollution Control Ordinance (CAP. 358)

Licence No.: WT00029932-2017

SAMPLE RECEIVED DATE : 22 April, 2019

TESTING DATE : 22-26 April, 2019

TEST RESULT :

TEST	METHOD	UNIT	LIMIT	RESULT
рН	/	/	6-10	8.08
TCOD	HACH Method 8000	mg/L	2000	340
Sulfate	HACH Method 10248	mg/L	1000	460
Total Nitrogen (as N)	HACH Method 10071	mg/L	200	18.2
Total Phosphorous (as P)	HACH Method 8190	mg/L	50	45
Total Suspended Solid	APHA 2540 D	mg/L	800	240
Oil & Grease	APHA 5520 B	mg/L	50	36
BOD ₅	APHA 5210 B	mg/L	800	30

For and on behalf of

ASB BIODIESEL (HONG KONG) LTD

JAY LEUNG

LABORATORY MANAGER

APPENDIX H
Test Result – Sulphur Content in Bio
Heating Oil



ASB Biodiesel (Hong Kong) Ltd.

No. : T21-20190422-0900

Date : 22 April, 2019

Page : 1 of 1

TEST REPORT

SAMPLE DESCRIPTION : Bio Heating Oil, Tank 21

SAMPLE RECEIVED DATE : 22 April, 2019

TESTING DATE : 22 April, 2019

TEST RESULT :

TEST	METHOD	UNIT	RESULT
Sulphur	EN ISO 20846: 2011	mg/kg	298

For and on behalf of

ASB BIODIESEL (HONG KONG) LTD

JAY LEUNG

LABORATORY MANAGER

APPENDIX I Complaint Log

APPENDIX I – COMPLAINT LOG

Reporting Month: March 2019

Log Ref.	Location	Received Date	Details of Complaint	Investigation/Mitigation Action	Status
COM- 2016-09- 001	Not Specified	24 th September, 2016	2 Gammon engineers complained about strong odour and oily discharge at 9:15 am	The incident was due to the pump P101A was tripped and leaded to an overflow of wastewater at Influent Pit T101. According to the project proponent, at 8:45 am, high level alarm at Level Indicator of T101 was triggered and the water level in Influent Pit T101 was over 100%. Investigation found out that wastewater was flooding from Bar Screen Room to road because the pump P101A was not operating in the field (although the pump was indicated operating in Process Control System). Operator then immediately stopped the wastewater feeding to Influent Pit T101, and put sand bags around the stormwater grating outside the pedestrian walkway of Bar Screen Room to block wastewater leaking into storm water drainage. Afterwards, the Operator cleaned up the area. The problem was resolved at 10:30 am at the same day, and no irritation smell was sensed outside the project site. To prevent recurrence, the following measures are recommended: - Cover the storm water grating outside the bar screen room pedestrian walkway by steel plate; - Modify the pump P101A temporary control circuit to feedback overload trip signal back to Process Control System. Maintenance will set up periodic inspection programme to monitor pump performance; and - Review the emergency handling procedures.	Closed
COM- 2016-10- 002	Not Specified	5 th October, 2016	EPD referred that a councilor complained about constant smell released from the Project	Investigation found out that housekeeping of the plant was unsatisfactory and improvements are required. Operator has improved housekeeping, including: - Always keep the gate of the grease trap waste screening room closed; - Always keep sludge containers closed; - Frequent cleaning of drainage system; and - Always keep the work site clean and tidy	Closed

Log Ref.	Location	Received Date	Details of Complaint	Investigation/Mitigation Action	Status
COM- 2016-10- 003	Not Specified	18 th October, 2016	EPD referred that a complaint on malodour from the Project was received on 11 th October 2016	Investigation found no process upset during that week. Operator has put the best effort housekeeping (e.g. keeping sludge containers and rooms closed and frequent cleaning of drainage system), and staff have been trained on housekeeping.	Closed
COM- 2017-02- 004	Not Specified	6 th February, 2017	EPD referred complaints from Drainage Service Department (DSD) and neighboring sites regarding the blockage of public sewerage system along Chun Wang Street. DSD reported to EPD that some oily substances and debris had blocked the sewerage system.	Investigation found similar substances (i.e. oily substances and debris) at the foul manhole within the Plant. Investigation also found that untreated effluent was discharged to a foul manhole within the Plant. Follow-up action (i.e. cleaning of internal sewerage system, from FMH01 to TFMH01) was carried out in early February. In addition, the Operator has put the best effort (e.g. carry out staff training) to ensure that all effluent are treated properly by wastewater treatment facilities before discharge.	Closed
COM- 2017-07- 005	Not Specified	4 th July, 2017	EPD referred that resident of LOHAS Park complained operation of ASB plant caused noise nuisance (low frequency machinery noise continuously round the clock) and emitted unpleasant malodour on 19 June, 2017.	Noise Nuisance Since there are other noise sources which operate continuously round the clock (e.g. cooling tower from other buildings) between the Project Site and LOHAS Park, the noise nuisance could be due to other noise sources. In addition, investigation found no process upset on that day. Considering the long distance (at least 900m) between the Project Site and LOHAS Park, the noise nuisance may not be caused by the Operator. Unpleasant Malodour Investigation found no process upset during the week. Since the regular odour monitoring (i.e. odour measurement at the Final Air Scrubber and odour patrol along Site boundary) did not report any exceedance event (except this complaint) in June and July 2017, the unpleasant malodour may not be caused by the Project considering the long distance (at least 900m) between the Project Site and LOHAS Park. Operator has, and will, put the best effort housekeeping (e.g. keeping sludge containers and rooms closed and frequent cleaning of drainage system) to minimize odour nuisance.	Closed

Log Ref.	Location	Received Date	Details of Complaint	Investigation/Mitigation Action	Status
COM- 2017-07- 006	Stack of Boiler	4 th July, 2017	EPD referred that a complaint on continuous dark smoke emission from Stack of Boiler on 30 June, 2017 at about 6 pm.	Investigation found that a Pressure Control Valve had malfunctioned, causing unsteady oil flow into burner. This led to a low air to fuel ratio which ultimately led to dark smoke emission. The Valve was repaired on 1st July 2017 morning, and no dark smoke was emitted.	Closed
COM- 2017-10- 007	Not Specified	6 th October 2017	EPD referred that employee of nearby plant (Chun Wang Street, Tseung Kwan O Industrial Estate) complained ASB biodiesel plant emitting malodour continuously.	Investigation found no process upset during the week. Regular odour monitoring (i.e. odour measurement at the Final Air Scrubber and odour patrol along Site boundary) did not report any exceedance event (except complaint) in this reporting month. Nevertheless, as joint site visit on 1 st November 2017 carried out by ET & IEC identified several environmental deficiencies. Necessary actions were proposed to the Operator, and the Operator rectified the deficiencies.	Closed
COM- 2017-10- 008	Not Specified	17 th October 2017	EPD referred that employee of nearby plant (Chun Wang Street, Tseung Kwan O Industrial Estate) complained ASB biodiesel plant emitting malodour from 7:15am to afternoon on 12 Oct 2017 and from 7:50am to afternoon on 13 Oct 2017.	Investigation found no process upset during the week. Regular odour monitoring (i.e. odour measurement at the Final Air Scrubber and odour patrol along Site boundary) did not report any exceedance event (except complaint) in this reporting month. Nevertheless, as joint site visit on 1 st November 2017 carried out by ET & IEC identified several environmental deficiencies. Necessary actions were proposed to the Operator, and the Operator rectified the deficiencies.	Closed
COM- 2017-11- 009	Stack of Boiler	17 th November 2017	EPD referred that a complaint was received regarding continuous dark smoke emission from Stack of Boiler on 14 Nov 2017 at 12:50pm.	Investigation found that the steam boiler was tripped (the P11 filter was blocked) and caused dark smoke emission. The Operator had stopped the production immediately, and carried out maintenance work (filter cleaning and purging) to rectify the problem. The Operator will carry out regular maintenance more frequently to minimize the chance of tripping. The Operator also carried out an incident sharing on 18 Dec 2018 to prevent recurrence of similar event.	Closed

Log Ref.	Location	Received Date	Details of Complaint	Investigation/Mitigation Action	Status
COM- 2017-11- 010	Stack of Boiler	20 th November 2017	EPD referred that a complaint was received regarding continuous dark smoke emission from Stack of Boiler on 18 Nov 2017 from 11:00am to noon (12:00).	Investigation found that the steam boiler was tripped (the P11 filter was blocked) and caused dark smoke emission. The Operator had stopped the production immediately, and carried out maintenance work to rectify the problem. As the same filter was cleaned on 14 Nov 2017 (COM-2017-11-009) and was blocked again within a few days, the Operator replaced the filter. The Operator will carry out regular maintenance more frequently to minimize the above of tripping. The Operator also carried out an incident charge on 18 Dec 2018.	Closed
			11:00am to noon (12:00).	chance of tripping. The Operator also carried out an incident sharing on 18 Dec 2018 to prevent recurrence of similar event.	
COM- 2017-11- 011	Not Specified	21 st November 2017	EPD referred that employee of nearby plant complained ASB biodiesel plant emitting malodour continuously.	Although investigation found no process upset during the week, the roller door of the sludge container room was impaired, which would emit malodour. The Operator fixed the roller door. Nevertheless, regular odour monitoring (i.e. odour measurement at the Final Air Scrubber and odour patrol along Site boundary) did not report any exceedance event (except complaint) in this reporting month. Besides, joint site visit on 11 th December 2017 carried out by ET & IEC identified several environmental deficiencies. Necessary actions were proposed to the Operator, and the Operator rectified the deficiencies.	Closed
COM- 2017-11- 012	Not Specified	23 th November 2017	EPD referred that a complainant complained ASB biodiesel plant emitting malodour across Chun Wang Street.	Investigation found no process upset during the week. The impaired roller door of the sludge container room (COM-2017-11-011) hadn't been fixed. The Operator fixed the roller door. Nevertheless, regular odour monitoring (i.e. odour measurement at the Final Air Scrubber and odour patrol along Site boundary) did not report any exceedance event (except complaint) in this reporting month. Besides, joint site visit on 11 th December 2017 carried out by ET & IEC identified several environmental deficiencies. Necessary actions were proposed to the Operator, and the Operator rectified the deficiencies.	Closed

Log Ref.	Location	Received Date	Details of Complaint	Investigation/Mitigation Action	Status
COM- 2017-11- 013	Not Specified	29 th November 2017	EPD referred that a complainant at Tseung Kwan O Industrial Estate complained ASB biodiesel plant emitting malodour continuously, from Monday to Saturday, from 8:00am to 7:00pm. The complainant suspected that the odourous gas is toxic and causes air pollution. The complainant also pointed out that complaint on malodour was raised one year ago. Although the malodour was mitigated after EPD's follow-up action, the problem resumed after 2 weeks.	Regular odour monitoring (i.e. odour measurement at the Final Air Scrubber and odour patrol along Site boundary) did not report any exceedance event (except complaint) since the commencement of the Project's operational phase. Nevertheless, during the year, site visits carried out by EPD and site audits carried out jointly by the Operator, ET and IEC identified environmental deficiencies which would pose malodour problem. The recent joint site audit carried out by the Operator, ET and IEC on 11th December 2017 identified several environmental deficiencies. Necessary actions were proposed to the Operator, and the Operator rectified the deficiencies. Regarding the complainant suspected that the odourous gas is toxic, investigation found no chemical leakage record. In addition, according to the monthly monitoring result, acetaldehyde and methanol emissions from the stack of process building were lower than reporting level in the reporting month. Therefore, the odourous gas is not likely to be due to chemicals. It is expected that the malodour was due to environmental deficiencies (e.g. sludge being left on ground, doors not being closed properly) identified by ET and IEC. It is because the complainant mentioned that the malodour had existed for a long time, and similar environmental deficiencies were identified in past site visits.	Closed
COM- 2017-11- 014	Not Specified	29 th November 2017	EPD referred that a complaint complained oily substances being discharged from an outfall near the roundabout at the western end of Chun Wang Street. The oily substances was suspected to be discharged from the ASB biodiesel plant.	Investigation found that the diaphragm pump of S811 in the wastewater treatment plant was blocked. To prevent wastewater overflowing, the Operator placed a plastic tray underneath the pump. In addition, the Operator installed inflatable bladder to prevent wastewater flowing out via drainage channel. As the Operator had implemented measures to prevent wastewater being discharged via drainage channel, the event is not likely to be caused by the pump blockage. Nevertheless, a joint site visit on 11 th December 2017 carried out by ET & IEC found oily substance being left near drainage channel. The Operator has 1.) cleaned up the oily substance; 2.) cleaned the oil interceptor; and 3.) cleaned the drainage system.	Closed

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COM- 2018-01- 015	Not Specified	29 th January 2018	EPD referred that a complainant complained ASB biodiesel plant emitting malodour across Chun Wang Street.	Investigation found that the tricanter in the wastewater treatment plant was blocked on 29 th January 2018. During maintenance on the same day, some odourous material (e.g. sludge) spilled out. The Operator has cleaned up the spilled material. Joint site visit on 5 th February 2018 carried out by ET & IEC identified several environmental deficiencies. Necessary actions were proposed to the Operator, and the Operator rectified the deficiencies.	Closed
COM- 2018-04- 016	Not Specified	13 th April 2018	EPD referred a complaint regarding continuous dark smoke emission from chimney on 12 Apr 2018 afternoon.	Investigation found that the dark smoke was emitted from the Stack of Boiler, which was under testing after the reparation of the boiler. The Operator also pointed out that the dark smoke emission was due to cold starting of the boiler and is inevitable. As the boiler was cold and was not in optimized temperature, the fuel cannot be combusted completely for a short period of time. Nevertheless, in order to minimize dark smoke emission, the Operator had 1.) preheated the fuel and 2.) set the fan to the highest speed to provide enough air for combustion. Although the Operator has camera for real-time monitoring at chimney, it is recommended that the Operator should provide a log on the duration of dark smoke emission. This allows the Operator to ensure that the inevitable dark smoke emission complies environmental license(s) granted.	Closed
COM- 2018-11- 017	Not Specified	13/11/2018	EPD referred a complaint in which the complainant stated that malodour was detected at Chun Wan street, near Gammon Technology Park, on 13 Nov 2018 afternoon when northern wind was prevailing.	 EPD referred a complaint in which the complainant stated that malodour was detected at Chun Wan street, near Gammon Technology Park, on 13 Nov 2018 afternoon when northern wind was prevailing. Joint site visit on 19th November 2018 carried out by ET & IEC identified the pungent smell which is consistent with the smell detected outside the plant was detected near the WWTP. The operator has proposed the following mitigation measures to counteract the problem: 1) Partitions will be provided in the WWTP sludge container room to facilitate the control of the negative pressure of the rooms 2) Conduct an investigation on the equipment in WWT to ensure that no gaps are found. 3) Modification of the outdoor sludge containers with the motorized covering to minimise the odour emission from the sludge 	Closed

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				4) Additional scrubbers shall be provided for WWTP sludge container room, fat preparation room and PB fertilizer room to improve the efficiency of the odour elimination by the scrubbers	
				 Jan 2019 A Site audit was carried out on 7th January 2018 to check if the odour problem has been improved. The pungent smell that was detected earlier on previous site visit (19th November 2018) has been alleviated. However, a few environmental deficiencies was identified during the site audit within the WWTP, which was regarded as the odour source. The environmental deficiencies are as follows: The DAF/oil-water separators were not fully covered. A tank within the Pre-acidification/ buffer tank was not open to air and steam was seen rising out from the tank addition, mitigation measures as stated were not implemented, therefore, this issue should be followed up in the next site audit 	
				The Project Proponent/ operator has rectified / improved all environmental deficiencies identified in this investigation.	
COM- 2019-03- 018	Not specific	18 th March 2019	EPD referred a complaint in which the complainant stated that malodor was detected at Plant in Tseung Kwan O Industrial Estate on 18 Mar 2019. The complainant stated that malodor has adversely affected their mental and physical health. And the problem have not been solved since the previous complaints were made.	Investigation is still on-going, details and results of the investigation will be supplemented in the next monthly EMA report.	On-going

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COM- 2019-04- 19	Wastewater pool	25 th April 2019	EPD referred a complaint in which the complainant stated that malodor was detected at Chun Wan Street, near Gammon construction site on 24 April 2019. The complainant suspected that the odour was occurred as a result of not clearing the wastewater in ASB frequent enough. The southeasterly winds also brought the malodor to LOHAS park.	Investigation is still on-going, details and results of the investigation will be supplemented in the next monthly EMA report.	On-going