ASB Biodiesel (Hong Kong) Limited

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate

Quarterly EM&A Report April – June 2018 (Version 1.0)

N.P.

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.

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| Subject: | t: Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate Draft Quarterly EM&A report (Apr - Jun 2018) v1.0 | | | |
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| From: | Mr. Mark Cheung | Ref: | D1067/P07216 | |
| Attn: | Mr. H. T. Lai | <i>Fax:</i> | 3107 1388 | |
| To: | Cinotech | Date: | 9 August 2018 | |

Dear Sir,

We refer to your submission of the Draft Quarterly EM&A report (Apr - Jun 2018) v1.0 via email dated 7 August 2018.

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

Ręgards,

Mark Cheung Independent Environmental Checker KTC/gk

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EXECUTIVE SUMMARY

Introduction

1. This is the 9th quarterly 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 – June 2018.

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, 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. As there was limited biogas production in April 2018, emission from stack of biogas flare cannot be sampled. Therefore, monitoring on emission from the stack was suspended in April 2018.
- 5. As there was limited production in May 2018 and the plant was shut down for annual maintenance in June 2018, emission from stacks of boiler, biogas flare and process building cannot be sampled. Therefore, monitoring on emission from these stacks was suspended in May & June 2018.
- 6. Monitoring on emission form stacks of boiler, biogas flare and process building will be resumed in July 2018.

Key Information in the Reporting Quarter

7. Summary of key information in this reporting quarter (April – June 2018) is listed in **Table I**.

| Table I | Summary of Key Information in April – June 2018 |
|---------|---|
|---------|---|

| | Event Details | | | | | |
|---|---------------|--|---|--------------------|--|--|
| Event | Number | Nature | Action Taken | Status | Remark | |
| Exceedance of Action & Limit Levels | 0 | | N/A | N/A | | |
| Complaint received | 1 | Complaint about dark smoke emission | Event was investigated, and follow-up works have been carried out by the operator | Closed | Follow-up works for 3 complaints are on- going | |
| Changes to the assumptions and key construction / operation activities recorded | 0 | | N/A | N/A | | |
| Status of submissions under EP | 8 | (1): Monthly EM&A Report for Sep 2017 v2.0 (2): Monthly EM&A Report for Mar 2018 v1.0 (3): Quarterly EM&A Report (Jul – Sep 2017) (4): Monthly EM&A Report for Nov 2017 v2.0 (5): Monthly EM&A Report for Jan 2018 v2.0 (6): Quarterly EM&A Report (Oct – Dec 2017) (7): Monthly EM&A Report for Apr 2018 v1.0 (8): Monthly EM&A Report for May 2018 v1.0 | (1), (2) & (3): Submitted to EPD on 13 Apr 2018 (4), (5) & (6): Submitted to EPD on 30 Apr 2018 (7): Submitted to EPD on 14 May 2018 (8): Submitted to EPD on 14 June 2018 | Verified by IEC | | |
| Notifications of any summons & prosecutions | 2 | (1) & (2): Summons to defendant regarding the contravention of licence granted under the WPCO | 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 lowcarbon 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 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 9th Quarterly EM&A report summarizing the EM&A works in operational phase for the Project in April June 2018.

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**.

| Party | Role | Name | Position | Phone No. |
|----------|---|-----------------|---|-----------|
| ASB | Permit Holder & | Mr. Andy Chan | EHS & Licensing Manager | 3183 4202 |
| ASD | Operator | Mr. Nelson Tam | Engineer | 3183 4315 |
| Manainaa | Independent Environmental Checker | Mr. Mark Cheung | Independent Environmental Checker | 3168 2028 |
| Mannings | | Mr. Gavin Kwok | Assistant to Independent Environmental Checker | 3970 8628 |
| Cinotech | Environmental | Dr. HF Chan | ET Leader | 2151 2088 |
| chioteen | Team | Mr. HT Lai | Project Coordinator | 2151 2077 |

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; &
 - Conditions listed in the SP License.

Status of Environmental Licensing and Permitting

1.9 All permits/licenses obtained for the Project are summarized in Appendix A.

2 ENVIRONMENTAL MONITORING REQUIREMENTS

Air Quality

2.1 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 patrol along the Project Site boundary is also required. Detailed monitoring criteria (i.e. frequency, parameter, and action & limit levels) are listed in Appendix B. If limit levels are exceeded, the event and action plan as shown in Appendix C should be implemented.

Water Quality

2.2 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. Detailed monitoring criteria (i.e. frequency, parameter, and limit levels) are listed in Appendix B. If limit levels are exceeded, the event and action plan as shown in Appendix C should be implemented.

Sulphur Content in Bio Heating Oil

- 2.3 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. Monitoring criteria (i.e. frequency, parameter, and limit level) for the sulphur content in BHO are listed in Appendix B. If limit level is exceeded, the following actions should be taken by the ET:
 - Inform Project Proponent and IEC within 24 hours;
 - 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.

3 MONITORING RESULTS

Air Quality

Emission from Stack of Boiler

3.1 Emission from stack of boiler was sampled and analyzed monthly. As there was limited production in May 2018 and the plant was shut down for annual maintenance in June 2018, emission from stack of boiler cannot be sampled. Therefore, monitoring on emission form the stack was suspended in May and June 2018, and will be resumed in July 2018. Monitoring results of emission from the stack of boiler in April 2018 are summarized in Table 3-1 below and graphical presentation of results is shown in Appendix D.

| Limit Loval | Monitoring Result * | | | |
|-------------|--|---|--|--|
| Limit Levei | Apr-18 | May-18 *** | Jun-18 **** | |
| 2.213 kg/h | 1.555 kg/h | - | - | |
| 0.553 kg/h | 0.263 kg/h | - | - | |
| 0.797 kg/h | < 0.04 kg/h | - | - | |
| 0.041 kg/h | 0.017 kg/h | - | - | |
| 7 m/s ** | 10 m/s | - | - | |
| | 0.553 kg/h 0.797 kg/h 0.041 kg/h 7 m/s ** | Limit Level Apr-18 2.213 kg/h 1.555 kg/h 0.553 kg/h 0.263 kg/h 0.797 kg/h < 0.04 kg/h | Limit Level Apr-18 May-18 *** 2.213 kg/h 1.555 kg/h - 0.553 kg/h 0.263 kg/h - 0.797 kg/h < 0.04 kg/h | |

Table 3-1Monitoring Result of the Emission from the Stack of Boiler

* Average result of all trials is presented. If one of the data was smaller than the limit of reporting, the smallest recordable value was used for calculation of average.

** Minimum level should be achieved.

*** Monitoring was suspended as there was limited production in reporting month.

**** Monitoring was suspended as the plant was shut down for annual maintenance in reporting month.

3.2 No exceedance of Limit Level was reported in April – June 2018.

Emission from Stack of Biogas Flare

3.3 As (1) there was limited biogas production in April 2018, (2) there was limited production in May 2018 and (3) the plant was shut down for annual maintenance in June 2018, emission from stack of biogas flare cannot be sampled. Therefore, monitoring on emission form the stack was suspended in April – June 2018, and will be resumed in July 2018. The graphical presentation of monitoring results for the past 12 months is shown in **Appendix D**.

Emission from Stack of Process Building

3.4 Emission from stack of process building was sampled and analyzed monthly. As there was limited production in May 2018 and the plant was shut down for annual maintenance in June 2018, emission from stack of process building cannot be sampled. Therefore, monitoring on emission form the stack was suspended in May and June 2018, and will be resumed in July 2018. Monitoring results of the emission from the stack of

process building in April 2018 are summarized in **Table 3-2** below and graphical presentation of results is shown in **Appendix D**.

| Demonstern | Limit Loval | Monitoring Result * | | | |
|----------------------|-------------|---------------------|-----------------------|---|--|
| Parameter | Limit Level | Apr-18 | May-18 *** Jun-18 *** | | |
| Acetyldehyde | 0.0975 kg/h | < 0.001 kg/h | - | - | |
| Methanol | 0.0975 kg/h | < 0.015 kg/h | - | - | |
| Exhaust gas velocity | 0.79 m/s ** | 3.9 m/s | - | - | |

 Table 3-2
 Monitoring Result of the Emission from the Stack of Process Building

* Average result of all trials is presented. If one of the data was smaller than the limit of reporting, the smallest recordable value was used for calculation of average.

** Minimum level should be achieved.

*** Monitoring was suspended as there was limited production in reporting month.

**** Monitoring was suspended as the plant was shut down for annual maintenance in reporting month.

3.5 No exceedance of Limit Level was reported in April – June 2018.

Odour Concentration at the Final Air Scrubber

3.6 Odour Concentration at the final air scrubber was sampled and analyzed monthly. Summary of monitoring result of odour concentrations at the final air scrubber in April – June 2018 is presented in **Table 3-3** below and graphical presentation of results is shown in **Appendix D**.

Table 3-3Monitoring Result of the Odour Concentrations at the Final Air
Scrubber

| Davamatar | Limit Loval | Monitoring Result * | | | | |
|---|-------------|---------------------|---------------|-----------|--|--|
| Parameter | Limit Level | Apr-18 | May-18 Jun-18 | | | |
| Odour | 200.3 OU/s | 5.38 OU/s | 10.35 OU/s | 8.28 OU/s | | |
| Exhaust gas velocity | 0.7 m/s ** | 0.7 m/s | 0.8 m/s | 0.8 m/s | | |
| * Average result of all trials is presented. If one of the data was smaller than the limit of reporting, the smallest recordable value was used for calculation of average. | | | | | | |

** Minimum level should be achieved.

3.7 No exceedance of Limit Level was reported in April – June 2018.

Odour Patrols along Site Boundary

3.8 Odour intensity were monthly monitored by the odour patrols. Odour patrols were carried out by a qualified odour panelist in both morning and afternoon on 12 April, 18 May and 11 June 2018. Summary of monitoring result of odour patrols in April – June 2018 is presented in **Table 3-4** below and graphical presentation of results is shown in **Appendix D**.

| | | Odour Intensity | |
|------------|--|---|----------------------------|
| Date | Action Level | Limit Level | Range of Measured Level |
| April 2018 | Odour intensity ≥Class 2 recorded; or One documented complaint received | | 0-1~2 |
| May 2018 | | Odour intensity ≥Class 3 recorded on 2 | 0-1~2 |
| June 2018 | | consecutive patrols | 0-1~2 |

Table 3-4Monitoring Result of Odour Patrols along Site Boundary

3.9 No exceedance of Action Level or Limit Level was reported in April – June 2018.

Water Quality

Water Quality of Treated Effluent Discharged from Project Site

3.10 Water quality of treated effluent discharged from Project Site was sampled and analyzed monthly. Summary of water quality monitoring result of treated effluent discharge from Project Site in April – June 2018 is presented in **Table 3-5** below and graphical presentation of results is shown in **Appendix E**.

| Table 3-5 | Water Quality Monitoring Result of Treated Effluent Discharged |
|-----------|--|
| | from Project Site |

| Devenuetor | Limit Loval | Monitoring Result | | |
|---|--------------------------|--------------------------|----------|-----------|
| Parameter | Limit Level | Apr-18 | May-18 | Jun-18 |
| pH | Within the range of 6-10 | 7.96 | 8.67 | 7.74 |
| Suspended Solids | 800 mg/L | 600 mg/L | 40 mg/L | 47 mg/L |
| Biochemical Oxygen Demand (BOD) (5 days, 20°C | 800 mg/L | 160 mg/L | 90 mg/L | 70 mg/L |
| Chemical Oxygen Demand (COD) | | | 112 mg/L | 88 mg/L |
| Oil & Grease | 50 mg/L | <10 mg/L | 32 mg/L | 40 mg/L |
| Sulphate | 1000 mg/L | 95 mg/L | <20 mg/L | 70 mg/L |
| Total Nitrogen | 200 mg/L | 39 mg/L | 4.6 mg/L | 23.2 mg/L |
| Total Phosphorus | 50 mg/L | 5.1 mg/L | 8.5 mg/L | 18.0 mg/L |

3.11 No exceedance of Limit Level was reported in April – June 2018.

8

Water Quality of Stormwater Discharge

3.12 Water quality of stormwater discharge was sampled and analyzed quarterly. Summary of water quality monitoring result of stormwater discharge in April – June 2018 is presented in **Table 3-6** below and graphical presentation of results is shown in **Appendix E**.

| Devenuetar | Limit Loval | Monitoring ResultApr-18May-18 | | ult |
|--|-------------------------|-------------------------------|--|----------|
| Parameter | Limit Level | | | Jun-18 |
| pH | Within the range of 6-9 | | | 7.80 |
| Suspended Solids | 50 mg/L | | | 20 mg/L |
| Biochemical Oxygen Demand (BOD) (5 days, 20°C | 50 mg/L | | | 35 mg/L |
| Chemical Oxygen Demand (COD) | 100 mg/L | | | 50 mg/L |
| Oil & Grease | 30 mg/L | | | <10 mg/L |
| * Water quality of stormwater discharge from Project Site was sampled and analyzed quarterly | | | | |

 Table 3-6
 Water Quality Monitoring Result of Stormwater Discharge

3.13 No exceedance of Limit Level was reported in April – June 2018.

Sulphur Content in Bio Heating Oil

3.14 Sulphur content in bio heating oil was sampled and analyzed. Summary of monitoring result of Sulphur content in bio heating oil in April – June 2018 is presented in Table 3-7 below and graphical presentation of results is shown in Appendix F.

 Table 3-7
 Monitoring Result of Sulphur Content in Bio Heating Oil

| Devemeter | Limit Loval | Monitoring ResultApr-18May-18Jun-18 | | |
|-----------------|-------------|-------------------------------------|---------|---------|
| Parameter | Limit Level | | | |
| Sulphur Content | 346 ppm | 338 ppm | 326 ppm | 334 ppm |

3.15 No exceedance of Limit Level was reported in April – June 2018.

Summary of Exceedance Events in the Reporting Quarter

3.16 No exceedance event was recorded in April – June 2018.

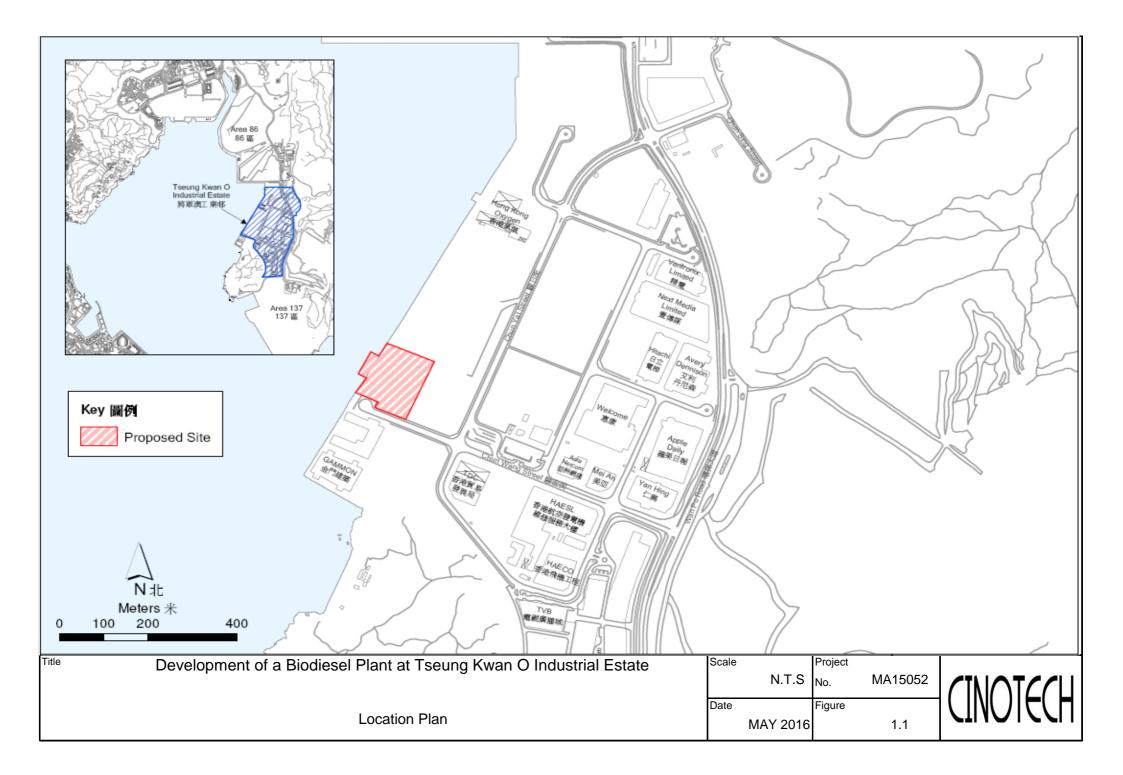
4 SUMMARY OF COMPLAINT AND PROSECUTION

- 4.1 1 environmental related complaint was received in April 2018 (see Appendix H).
- 4.2 In total, 1 and 1 notification of summons regarding the contravention of the WPCO licence (WT00022972-2015 and WT00029932-2017 respectively) were received in May and June 2018 respectively. No successful prosecutions was received in April June 2018.
- 4.3 There were 16 environmental complaints, 6 notification of summons, and 4 successful prosecutions received since the commencement of Project (operational phase). The Complaint Log is attached in **Appendix H**.

5 CONCLUSIONS

- 5.1 In April June 2018, 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 WT00029932-2017.
- 5.2 Monitoring of air quality, water quality and sulphur content in Bio Heating Oil were carried out at designated locations. In the reporting quarter, no exceedance of Action Level or Limit Level was recorded.
- 5.3 As there was limited biogas production in April 2018, emission from stack of biogas flare cannot be sampled. Therefore, monitoring on emission from the stack was suspended in April 2018.
- 5.4 As there was limited production in May 2018 and the plant was shut down for annual maintenance in June 2018, emission from stacks of boiler, biogas flare and process building cannot be sampled. Therefore, monitoring on emission from these stacks was suspended in May & June 2018.
- 5.5 Monitoring on emission form stacks of boiler, biogas flare and process building will be resumed in July 2018.
- 5.6 In the reporting quarter, 1 environmental related complaint, with 2 notification of summons and no successful prosecutions were received.

FIGURES



APPENDIX A Summary of Environmental Licensing and Permit Status

Appendix A Summary of Environmental Licensing and Permit Status

| | Valid Period | | 0 | <u> </u> | |
|------------------------|---------------|--------------|---|-----------------------|--|
| Permit / License No. | From | То | Summary | Status | |
| Environmental Permi | t (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(1) | 10/10/2013 | 10/10/2015 | • Emission of non-fugitive fixed point emissions | Under renewal | |
| 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 | |

APPENDIX B Summary of Monitoring Criteria

Appendix B Summary of Monitoring Criteria

| Air Quality | | | | |
|---|--|---|---|--|
| | Frequency | Parameter | Action Levels | Limit Levels |
| | | Nitrogen oxides (NO _X) | _ ** | 2.213 kg/h |
| | | Carbon monoxide (CO) | | 0.553 kg/h |
| Emission from Stack of Boiler | | Sulphur dioxide (SO ₂) | | 0.797 kg/h |
| (EP2) | | Non-methane Organic Compounds (NMOC) | | 0.041 kg/h |
| | Monthly for the first 12 months of | Exhaust gas velocity | | 7 m/s (minimum) |
| | operation. If the monitoring results of the first year monitoring meet the limit level, | NO _X | | 0.053 kg/h |
| Emission from | the monitoring will be reduced to half- | СО | | 0.018 kg/h |
| Stack of Biogas | yearly intervals for the whole operational stage. * | SO_2 | _ ** | 0.039 kg/h |
| Flare (EP1) | | NMOC | | 0.0018 kg/h |
| | | Exhaust gas velocity | | 0.54 m/s (minimum) |
| Emission from | | Acetyldehyde | | 0.0975 kg/h |
| Stack of Process | | Methanol | _ ** | 0.0975 kg/h |
| Building (EP3) | | Exhaust gas velocity | | 0.79 m/s (minimum) |
| Odour Concentrations at the Final Air Scrubber (EP5) | Monthly for the first 2 years of operation * | Odour | | 200.3 OU/s |
| | | 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 |

Appendix B Summary of Monitoring Criteria

| Water Quality | | | | |
|---|---------------------------|---|----------------------------|--|
| Discharge | harge Frequency Parameter | | Limit Levels | |
| | Monthly | 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 | | Chemical Oxygen Demand (COD) | 2000 mg/L | |
| Discharged from Project Site | | 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 | |
| | Quarterly | Suspended Solids | 50 mg/L | |
| Stormwater Discharge | | 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 | | | | |

| Sulphur Content in Bio Heating Oil | | | | |
|---|-----------------|-----------------|--|--|
| Frequency | Parameter | Limit Levels | | |
| 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 | | | | |

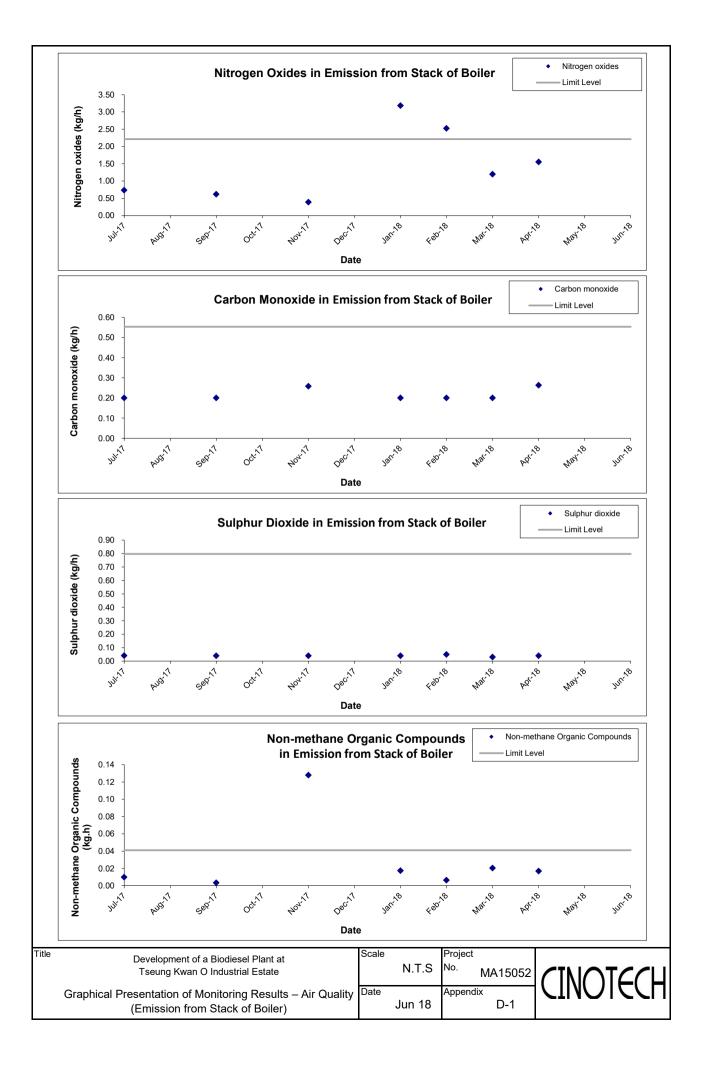
APPENDIX C Event and Action Plan

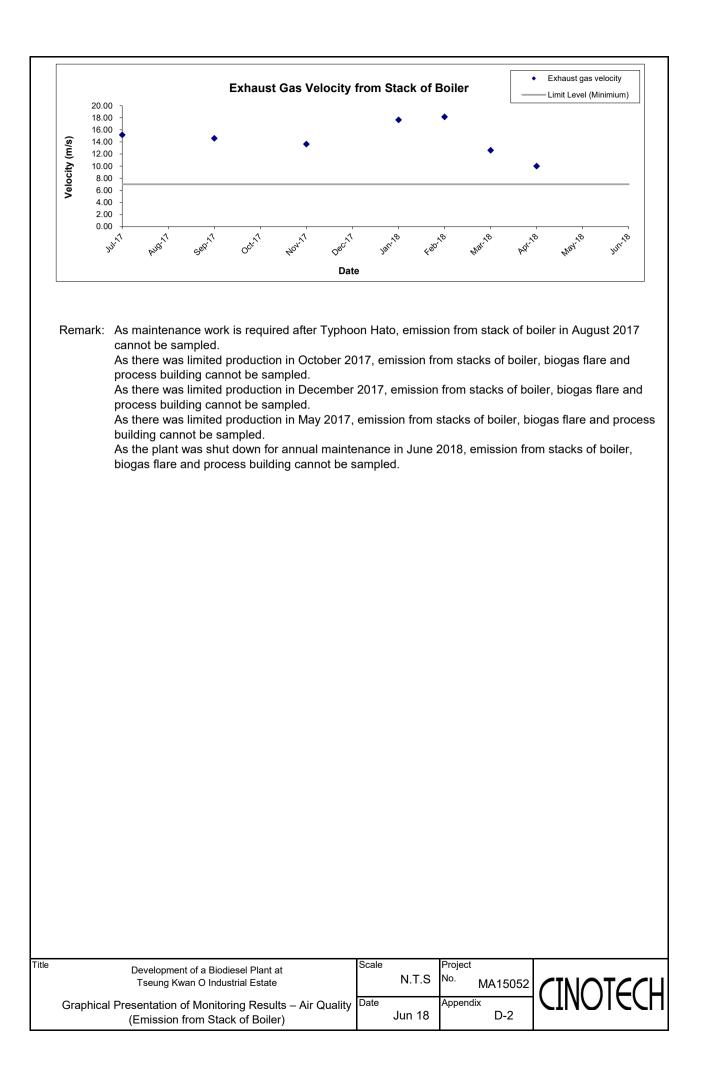
| Air Quality | | | | | |
|--|---|--|---|--|--|
| Event | Actions | | | | |
| Event | ET Leader | IEC | Project Proponent | | |
| Exceedance of Limit Level for stack emission from boiler, biogas flare, process building and final air scrubber | Inform Project Proponent and IEC, and investigate and record the cause of exceedance within 24 hours 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 intervals. | 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 | Inform Project Proponent and IEC, and investigate and record the cause of exceedance within 24 hours Repeat measurement to confirm finding 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 | | |

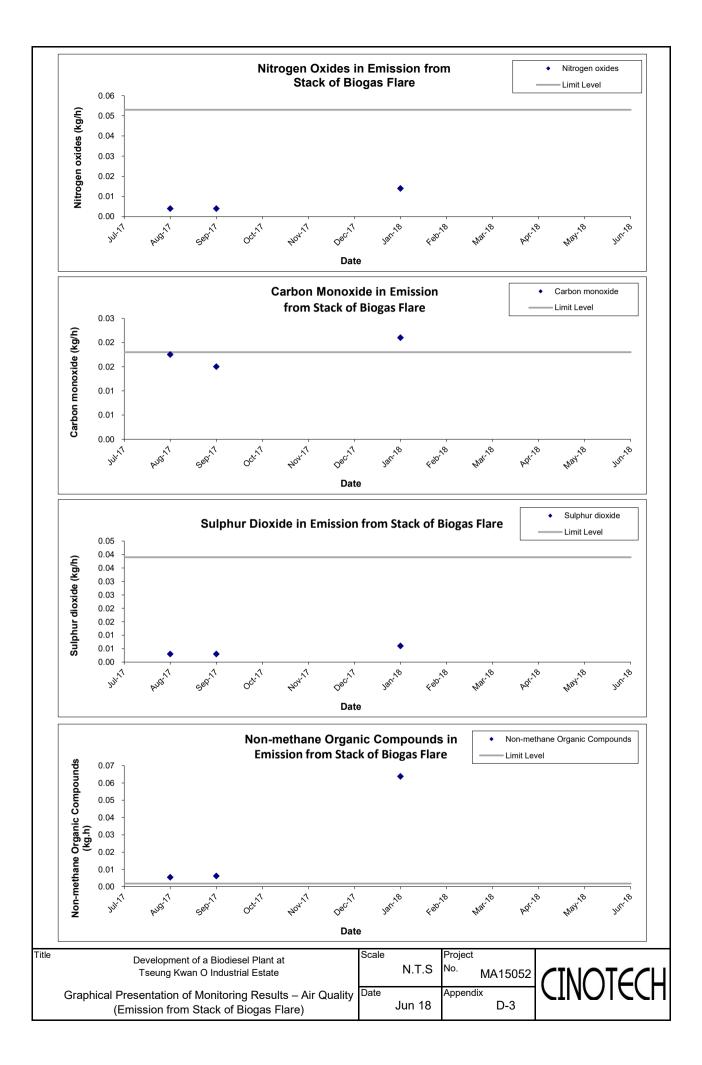
Appendix C Event and Action Plan

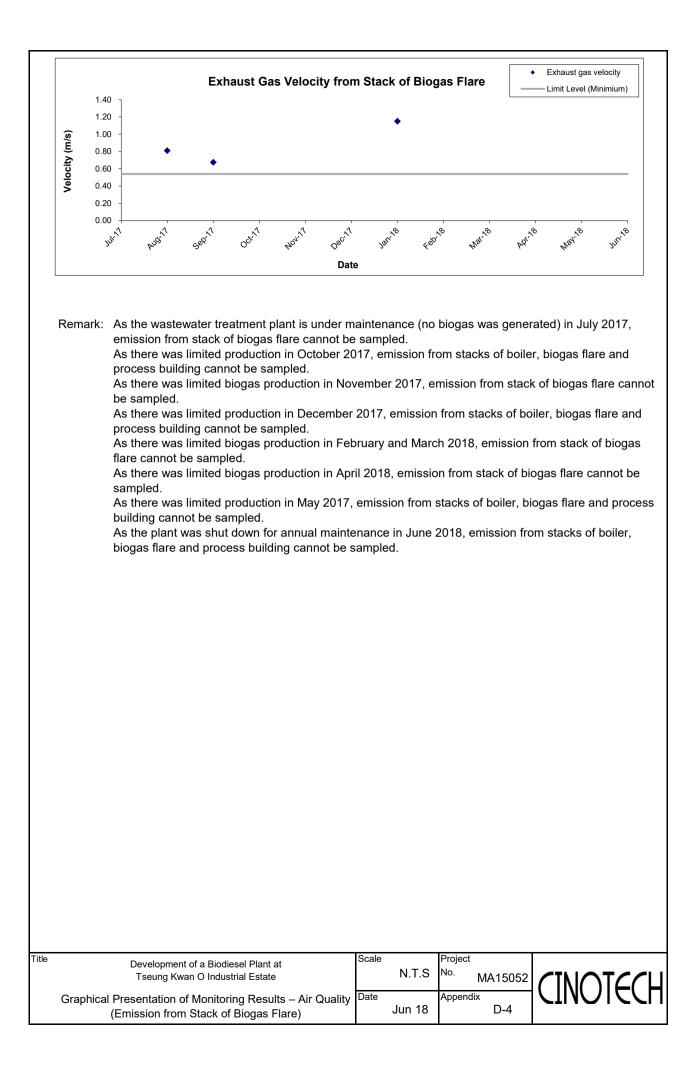
| Water Quality | | | | | |
|---|---|--|---|--|--|
| Event | Actions ET Leader IEC Project Proponent | | | | |
| Exceedance of Limit Level for Treated Effluent Discharged from Project Site | Inform Project Proponent and IEC, and investigate and record the cause of exceedance within 24 hours Repeat measurement to confirm finding Identify source(s) and investigate the cause(s) of exceedance 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 | Inform Project Proponent and IEC, and investigate and record the cause of exceedance within 24 hours Repeat measurement to confirm finding Identify source(s) and investigate the cause(s) of exceedance 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 | | |

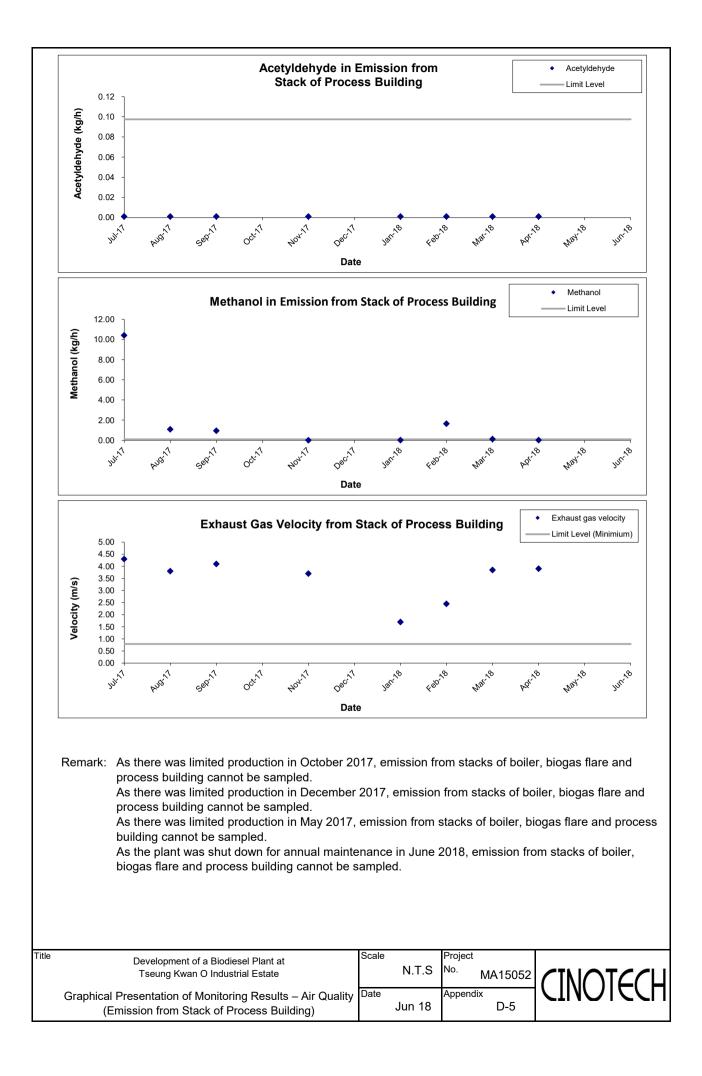
APPENDIX D Graphical Presentation of Monitoring Results – Air Quality

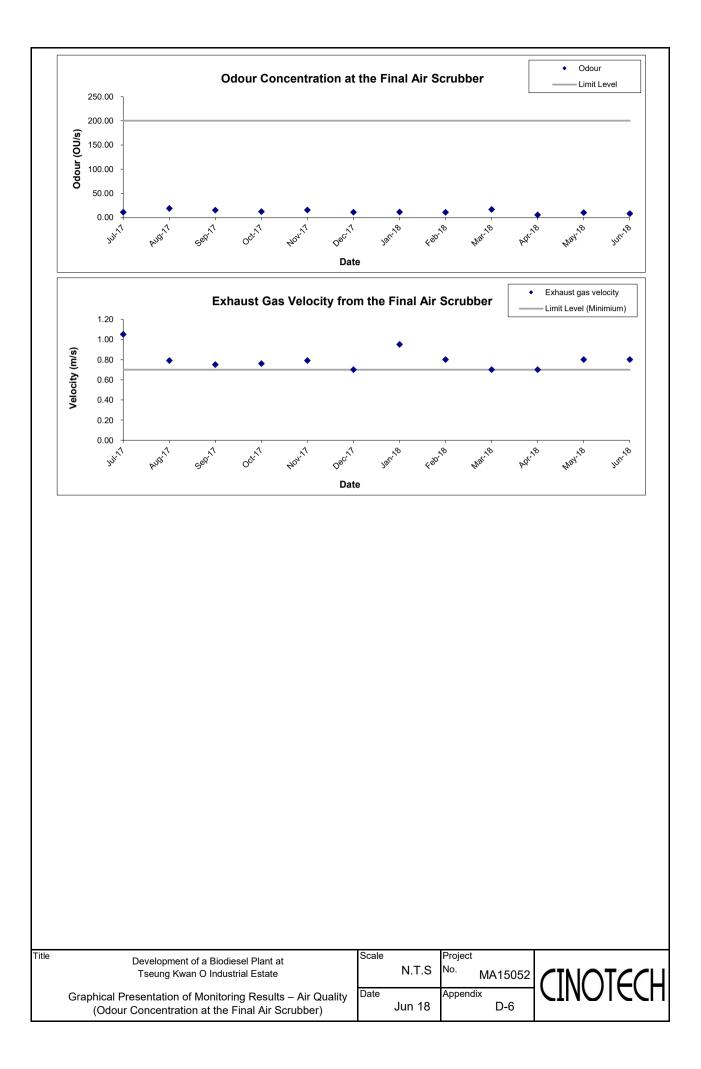


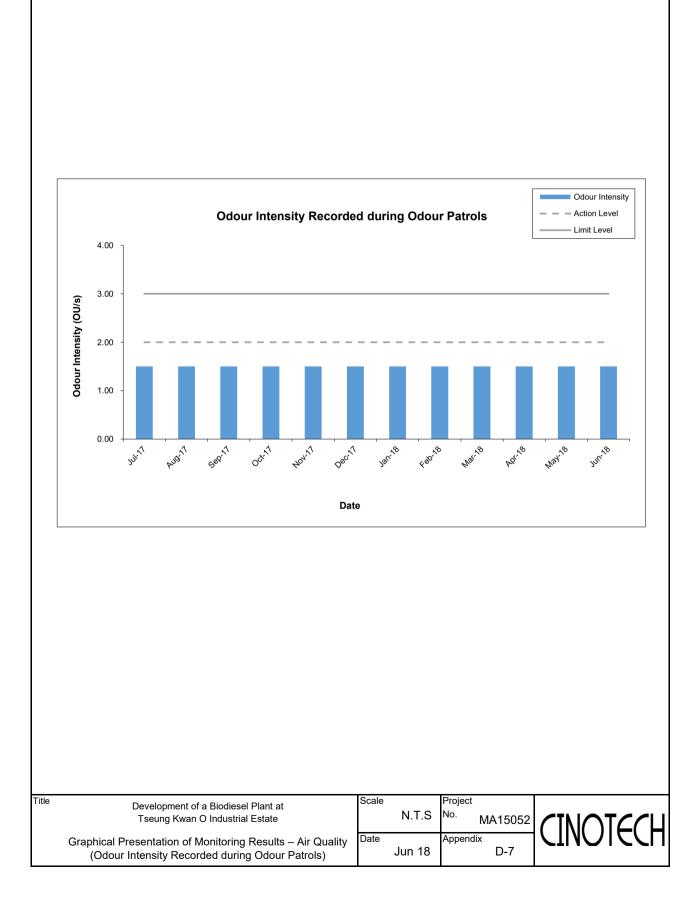




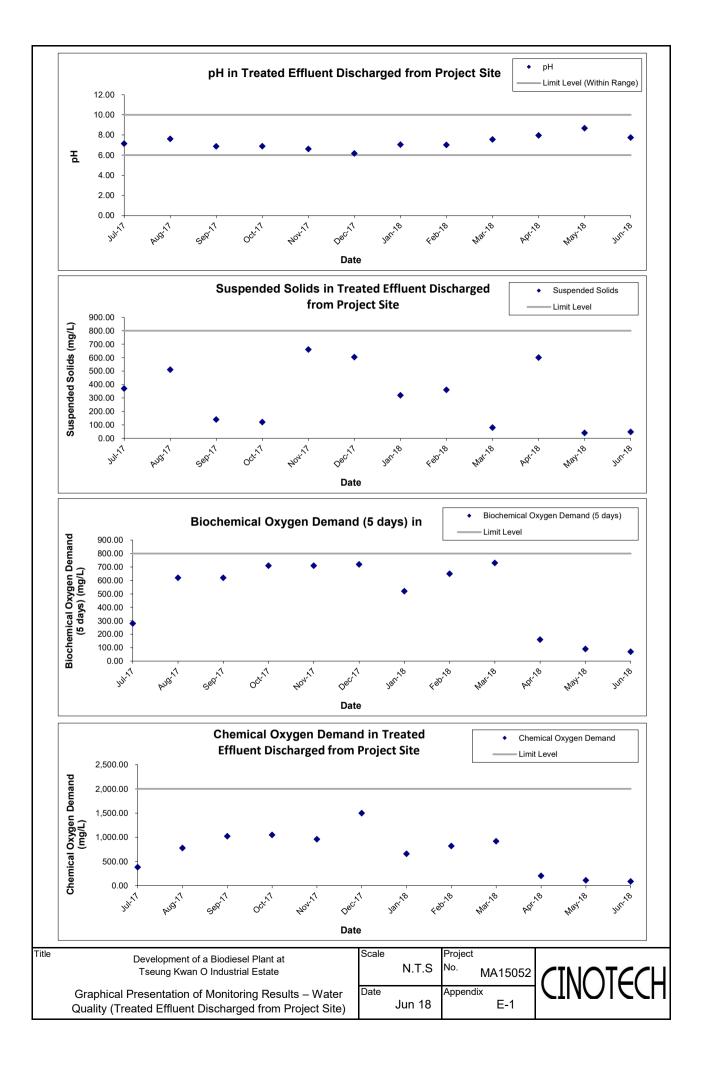


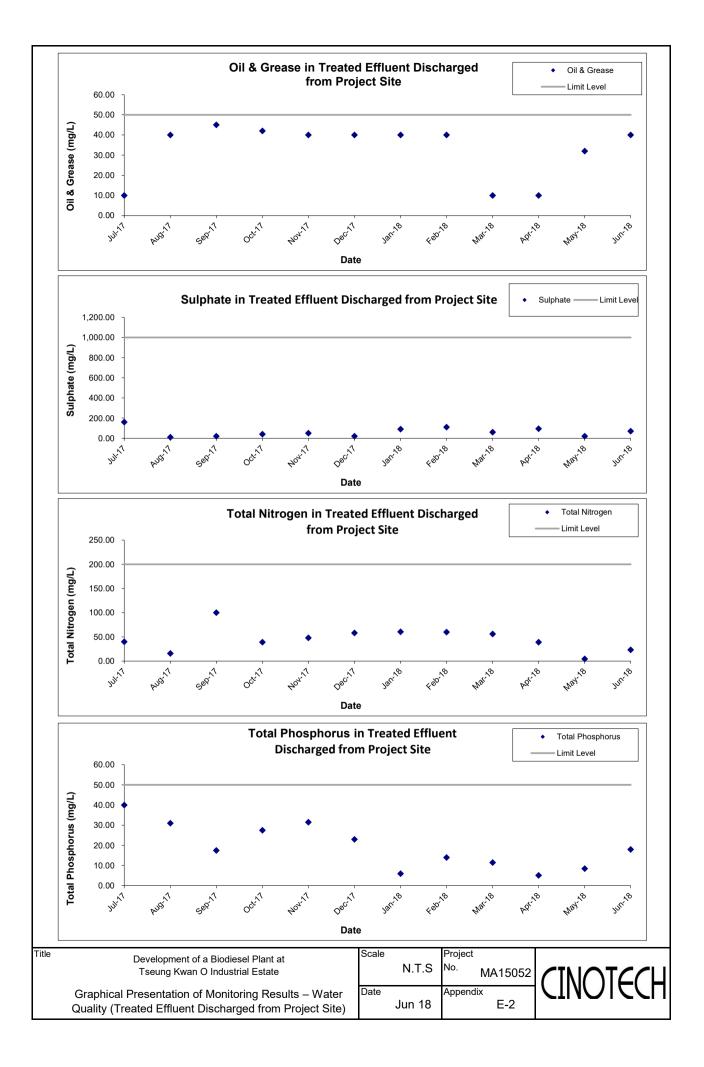


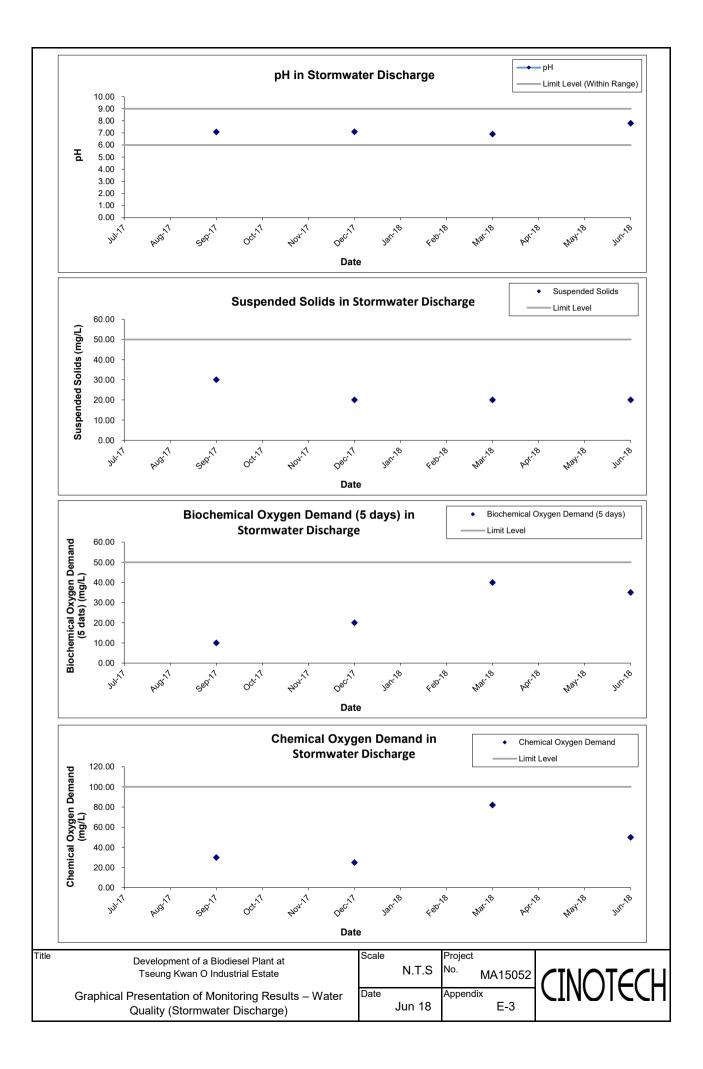


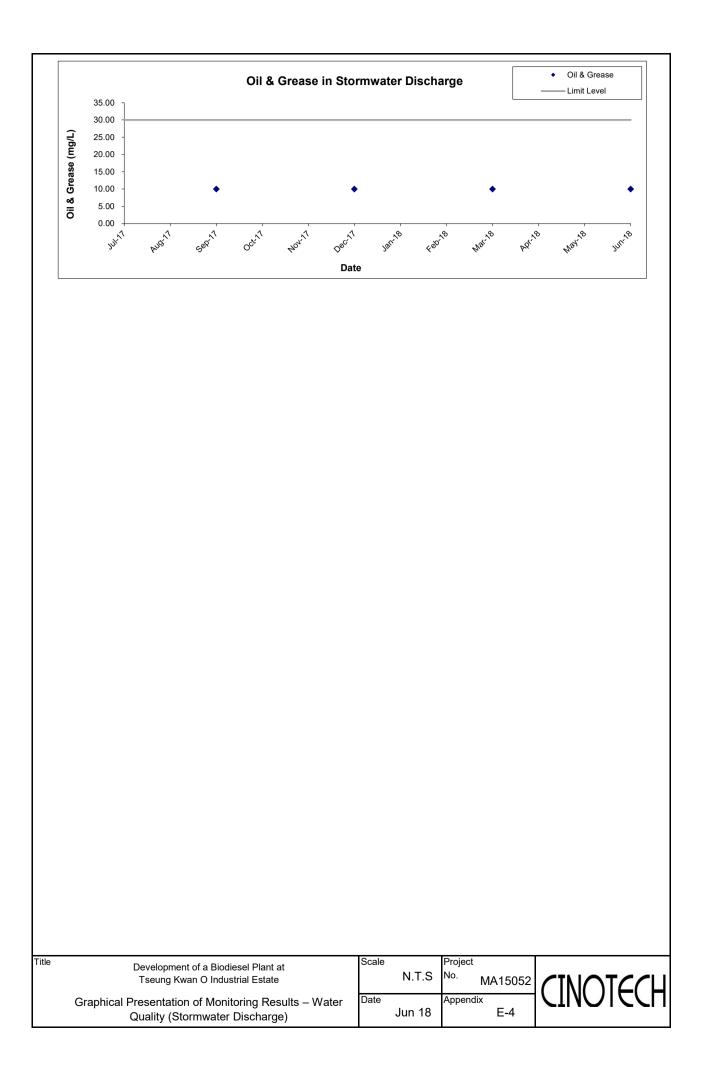


APPENDIX E Graphical Presentation of Monitoring Results – Water Quality

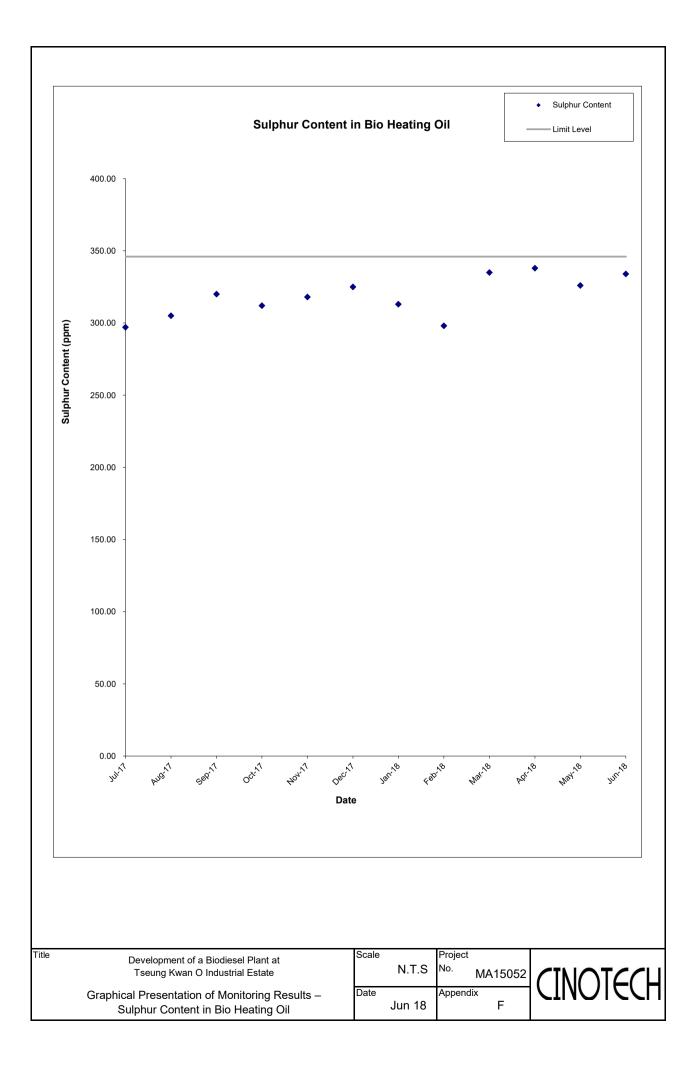








APPENDIX F Graphical Presentation of Monitoring Results – Sulphur Content in Bio Heating Oil



APPENDIX G Exceedance Report

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate

Exceedance Report

(A) Exceedance Report for Air Quality

| D 1 | | | No. of Ex | ceedance | |
|-----------------------------|--|---|---|-------------|---|
| Environmental Monitoring | Sources | Parameter | Action Level | Limit Level | |
| | | Nitrogen oxides (NO _X) | N.A. | 0 | |
| | | Carbon monoxide (CO) | N.A. | 0 | |
| | Staals of Dailar | Sulphur dioxide (SO ₂) | N.A. | 0 | |
| | Stack of Boiler | Non-methane Organic Compounds (NMOC) | N.A. | 0 | |
| | | Exhaust gas velocity | N.A. | 0 | |
| | Stack of Biogas Flare Stack of Process | Nitrogen oxides (NO _X) | N.A. | 0 | |
| | | Carbon monoxide (CO) | N.A. | 0 | |
| | | Sulphur dioxide (SO ₂) | N.A. | 0 | |
| Air Quality | | Flare | Non-methane Organic Compounds (NMOC) | N.A. | 0 |
| | | Exhaust gas velocity | N.A. | 0 | |
| | | Acetyldehyde | N.A. | 0 | |
| | | Methanol | N.A. | 0 | |
| | Building | Exhaust gas velocity | N.A. | 0 | |
| | Odour | Odour | N.A. | 0 | |
| | Concentrations at | | | | |
| | the Final Air Scrubber | Exhaust gas velocity | N.A. | 0 | |
| | Odour Patrols | Odour | 0 | 0 | |

Development of a Biodiesel Plant at Tseung Kwan O Industrial Estate

(B) Exceedance Report for Water Quality

| Environmental | Sources | Parameter | No. of Ex | ceedance | |
|---------------|---|------------------|--------------|-------------|--|
| Monitoring | Sources | Parameter | Action Level | Limit Level | |
| | | pН | N.A. | 0 | |
| | | Suspended Solids | N.A. | 0 | |
| | | Biochemical | | | |
| | | Oxygen Demand | N.A. | 0 | |
| | Turstal Efferent | (BOD) (5 days, | IN.A. | 0 | |
| | Treated Effluent | 20°C | | | |
| | Discharged from | Chemical Oxygen | N.A. | 0 | |
| | Project Site Stormwater Discharge | Demand (COD) | N.A. | | |
| | | Oil & Grease | N.A. | 0 | |
| | | Sulphate | N.A. | 0 | |
| Water Quality | | Total Nitrogen | N.A. | 0 | |
| | | Total Phosphorus | N.A. | 0 | |
| | | pН | N.A. | 0 | |
| | | Suspended Solids | N.A. | 0 | |
| | | Biochemical | | | |
| | | Oxygen Demand | N.A. | 0 | |
| | | (BOD) (5 days, | | 0 | |
| | | 20°C | | | |
| | | Chemical Oxygen | | 0 | |
| | | Demand (COD) | N.A. | 0 | |
| | | Oil & Grease | N.A. | 0 | |

(C) Exceedance Report for Sulphur Content in Bio Heating Oil

| Parameter | No. of Exceedance | | |
|-----------------|-------------------|-------------|--|
| | Action Level | Limit Level | |
| Sulphur Content | N.A. | 0 | |

APPENDIX H Complaint Log

APPENDIX I – COMPLAINT LOG

Reporting Quarterly: April – June 2018

| 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 1 st 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 chance of tripping. The Operator also carried out an incident sharing on 18 Dec 2018 to prevent recurrence of similar event. | Closed |
| 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 11 th 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, the investigation is still in progress. | Ongoing |
| 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 work has been carried out. A joint site visit on 11 th December 2017 carried out by ET & IEC found oily substance being left near drainage channel, the Operator is advised to 1.) clean up the oily substance; 2.) check and clean the oil interceptor; and 3.) clean the drainage system. | Ongoing |
| 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 has been rectifying the deficiencies. | Ongoing |

| Log Ref. | Location | Received Date | Details of Complaint | Investigation/Mitigation Action | Status |
|-------------------------|------------------|--------------------------------|---|---|--------|
| 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.) pre- heated 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 to ensure that the inevitable dark smoke emission complies environmental license(s) granted. | Closed |