QUARTERLY EM&A REPORT

OSCAR Bioenergy Joint Venture

Contract No. EP/SP/61/10
Organic Resources Recovery
Centre (Phase 1):
Thirtieth Quarterly EM&A Summary
Report

1 Sep 2022 - 30 Nov 2022

Environmental Resources Management

2509, 25/F, One Harbourfront, 18 Tak Fung Street, Hunghom, Kowloon, Hong Kong Telephone: (852) 2271 3000 Facsimile: (852) 3015 8052 E-mail: post.hk@erm.com http://www.erm.com

Meinhardt Infrastructure and Environment Limited

Organic Resources Recovery Centre, Phase I

30th Quarterly EM&A Report (1 Sept 2022 – 30 Nov 2022)

(November 2023)

Verified by: Claudine Lee

Position: Independent Environmental Checker

Date: 21st November 2023

QUARTERLY EM&A REPORT

OSCAR Bioenergy Joint Venture

Contract No. EP/SP/61/10
Organic Resources Recovery
Centre (Phase 1):
Thirtieth Quarterly EM&A Summary
Report

1 Sep 2022 - 30 Nov 2022 Reference 0279222

For and on behalf of ERM-Hong Kong, Limited		
Approved by:	Jasmine Ng	
Signed:	Jamie	
Position:	Managing Partner	
Certified by:(l	Environmental Team Leader - Mandy To)	
Date:	17 November 2023	

CONTENTS

EXECUTIVE SUMMARY

1	INTRODUCTION	1
1.1	PURPOSE OF THE REPORT	1
1.2	STRUCTURE OF THE REPORT	1
2	PROJECT INFORMATION	3
2.1	BACKGROUND	3
2.2	GENERAL SITE DESCRIPTION	4
2.3	MAJOR ACTIVITIES UNDERTAKEN	4
2.4	PROJECT ORGANISATION AND MANAGEMENT STRUCTURE	4
2.5	STATUS OF ENVIRONMENTAL APPROVAL DOCUMENTS	4
3	ENVIRONMENTAL MONITORING AND AUDIT REQUIREMENTS	6
3.1	ENVIRONMENTAL MONITORING	6
3.1.1	Air Quality	6
3.1.2	Odour	8
3.2	SITE AUDIT	10
3.2.1	Water Quality	10
3.2.2	Landscape and Visual	11
4	MONITORING RESULTS	12
4.1	AIR QUALITY	12
4.1.1	Operation Phase Monitoring	12
4.2	Odour	15
4.2.1	Operation Phase Monitoring	15
4.3	WATER QUALITY	15
4.3.1	Operation Phase Monitoring	15
4.4	WASTE MANAGEMENT	18
4.4.1	Operation Phase Monitoring	18
5	SITE AUDIT	20
5.1	ENVIRONMENTAL SITE AUDIT	20
5.1.1	Operation Phase	20
5.2	LANDSCAPE AND VISUAL AUDIT	20
6	ENVIRONMENTAL NON-CONFORMANCE	22
6.1	SUMMARY OF ENVIRONMENTAL NON-COMPLIANCE	22
6.2	SUMMARY OF ENVIRONMENTAL COMPLAINT	22
6.3	SUMMARY OF ENVIRONMENTAL SUMMON AND SUCCESSFUL PROSECUTION	22
7	FUTURE KEY ISSUES	23
7.1	KEY ISSUES FOR THE COMING REPORTING PERIOD	23

8 CONCLUSIONS 24

LIST OF TABLES

Table 2.1	Summary of Activities Undertaken in the Reporting Period
Table 2.2	Summary of Environmental Licensing, Notification and Permit Status
Table 3.1	Sampling and Laboratory Analysis Methodology
Table 3.2	Emission Limit for CAPCS Stack
Table 3.3	Emission Limit for CHP Stack
Table 3.4	Emission Limit for ASP Stack
Table 3.5	Emission Limit for Standby Flaring Gas Unit 0
Table 3.6	Odour Intensity Level
Table 3.7	Action and Limit Levels for Odour Nuisance
Table 3.8	Event and Action Plan for Odour Monitoring
Table 3.9	Discharge Limits for Effluent from the Effluent Storage Tank (as stipulated in
WT00038391-	2021)
Table 3.10	Discharge Limits for Effluent from the Petrol Interceptor(s) (as stipulated in
WT00038391-	2021)
Table 4.1	Hourly Average of Parameters Recorded for CAPCS
Table 4.2	Hourly Average of Parameters Recorded for CHP 1
Table 4.3	Hourly Average of Parameters Recorded for CHP 2
Table 4.4	Hourly Average of Parameters Recorded for CHP 3
Table 4.5	Hourly Average of Parameters Recorded for ASP
Table 4.6	Hourly Average of Parameters Recorded for the Standby Flaring Gas Unit
Table 4.7	Results of the Discharge Sample Collected from the Outlet Chamber of the
Effluent Stora	ge Tank in September 2022
Table 4.8	Results of the Discharge Sample Collected from the Effluent Storage Tank in
October 2022	
Table 4.9	Results of the Discharge Sample Collected from the Effluent Storage Tank in
November 20	22
Table 4.10	Results of the Discharge Sample from the Petrol Interceptor 1 on 19 October
2022	
Table 4.11	Results of the Discharge Sample from the Petrol Interceptor 2 on 1 September
2022	
Table 4.12	Results of the Discharge Sample from the Petrol Interceptor 2 on 19 October
2022	
Table 4.13	Quantities of Waste Generated from the Operation of the Project
Table 8.1	Exceedances for Stack Emissions

LIST OF ANNEXES

ANNEX A	LOCATION OF PROJECT
ANNEX B	PROJECT ORGANISATION CHART AND CONTACT DETAIL
ANNEX C	IMPLEMENTATION SCHEDULE OF MITIGATION MEASURES
ANNEX D	WASTE FLOW TABLE
ANNEX E	ENVIRONMENTAL COMPLAINT, ENVIRONMENTAL SUMMONS AND PROSECUTION LOG
ANNEX F	INVESTIGATION REPORT
ANNEX G	ODOUR PATROL RESULT

EXECUTIVE SUMMARY

The construction works of *No. EP/SP/61/10 Organic Resources Recovery Centre Phase* 1 (*the Project*) commenced on 21 May 2015. This is the 30th Quarterly Environmental Monitoring and Audit (EM&A) Report presenting the EM&A works carried out during the period from 1 September 2022 to 30 November 2022 in accordance with the EM&A Manual. Substantial completion of the construction works was confirmed on 3 December 2018. In the meantime, the operation phase EM&A programme had commenced in March 2019. Substantial Completion in respect of substantial part of the Works was confirmed on 24 February 2020. The construction phase EM&A programme was completed in the end of February 2020.

Summary of Works undertaken during the Reporting Period

Works undertaken in the reporting period included:

- Operation of the Project, including organic waste reception, and operation
 of the pre-treatment facilities, anaerobic digesters, composting facilities,
 air pollution control systems, on-line emission monitoring system for the
 Centralised Air Pollution Control Unit (CAPCS), Co-generation Units
 (CHP)s and Ammonia Stripping Plant (ASP), and the wastewater
 treatment plant;
- E50 Service for CHP 2 (overhaul works) was completed with testing and commissioning;
- Emergency repair works for the ECU (heat exchanger) for the ASP was conducted;
- Four points calibration and adjustment was conducted for the CEMS;
- Steam Generator tube bundle replacement and ECU cassette replacement were completed;
- The VOC sensor for CAPCS was installed in this reporting period, while further modification is still recommended:
- Biogas booster replacement was conducted; and
- Setting adjustments of the CHP 2 engine were conducted to fine tune and return the maximum loading of the engine to 1,500 kW.

Environmental Monitoring and Audit Progress

Air Quality Monitoring

Exceedances on NO_x , SO_2 and HCl from CHPs and NO_x , and NH_3 from ASP were recorded on the on-line monitoring system from September 2022 to November 2022. It should be noted that measurements recorded under abnormal operating conditions, e.g. start up and stopping of stacks, unstable operation, test runs and interference of sensor, are disregarded.

The exceedances of SO₂ from CHPs occurred due to tripping of the desulphurisation system caused by the failure of one of the columns of the system. The exceedances of NOx from CHPs occurred due to insufficient feedstock and system unstability. The exceedance of HCl from CHP 2 occurred due to system instability caused by the ongoing performance optimisation of the CHP 2, resulting in a lowered temperature of the system and the incomplete combustion of biogas. The exceedance of NH₃ and NOx from ASP occurred due to system instability caused by the ongoing performance optimisation of the ASP, resulting in a lowered temperature of the system and the incomplete combustion of biogas.

The Contractor has implemented mitigation measures to control the exceedance (including replacement of malfunctioned parts (desulphurisation system, columns of the ASP), cleaning for various parts (i.e. heat exchangers of all CHPs, stripping column and packaging of the ASP), and carried out fine-tuning of equipment of the ASP).

The Contractor is recommended to closely monitor the processes of the modification of the ASP and the post-modification monitoring of emission level to avoid any exceedance. As similar issues have been re-occurred for sometimes, the Contractor is advised to undertake a comprehensive review of the operation of the concerned systems and the effectiveness of the existing mitigation measures and proposed further measures to avoid the exceedance.

Odour

Odour patrols were conducted by the independent odour patrol team of ALS Technichem (HK) Pty Ltd on 9 and 22 September 2022. Level 2 Odour Intensity was not recorded during odour patrols.

Water Quality

No non-compliance to the effluent discharge limit stipulated in the discharge license issued by the EPD under the Water Pollution Control Ordinance was recorded during this reporting period.

Waste Management

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

0 L of chemical waste was collected by licenced waste collector from the operation of the Project.

1,678.17 tonnes of waste generated from pre-treatment process from the operation of the Project was disposed of at landfill. Among the recyclable waste generated from pre-treatment process from the operation of the Project, 0 tonnes of metals, 0 tonnes of papers/ cardboard packing and 0 tonnes of plastics were sent to recyclers for recycling during the reporting period.

Around 8.18 tonnes of general refuse from the operation of the Project was disposed of at landfill. Among the recycled general refuse from the

operation of the Project, 0.020 tonnes of metals, 0.035 tonnes of papers/cardboard packing and 0.020 tonnes of plastics were sent to recyclers for recycling during the reporting period.

Findings of Environmental Site Audit

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

• Joint Environmental Site Inspections 3 times

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

Environmental Exceedance/Non-conformance/Compliant/Summons and Prosecution

Exceedances for the air emission limits for the CHPs and ASP stacks were recorded during the reporting period.

No complaint/ summon/prosecution was received in this reporting period.

Future Key Issues

Activities to be undertaken in the next reporting period include:

- Operation of the Project;
- Additional setting adjustments of CHP2; and
- Further testing in preparation of the Biogas Holder replacement works.

1 INTRODUCTION

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

1.1 Purpose of the Report

This is the 30th Quarterly EM&A report which summarises the monitoring results and audit findings for the EM&A programme during the reporting period from **1 September 2022** to **30 November 2022**.

1.2 STRUCTURE OF THE REPORT

The structure of the report is as follows:

Section 1: Introduction

It details the scope and structure of the report.

Section 2: Project Information

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

Section 3: Environmental Monitoring and Audit Requirements

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

Section 4: Monitoring Results

It summarises monitoring results of the reporting period.

Section 5: Site Audit

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

Section 6: Environmental Non-conformance

It summarises any exceedance of environmental performance standard, environmental complaints and summons received within the reporting period. Section 7: Further Key Issues

It summarises the impact forecast for the next reporting period.

Section 8: Conclusions

2 PROJECT INFORMATION

2.1 BACKGROUND

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

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

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

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

The construction works commenced on 21 May 2015. The operation phase of

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

2.2 GENERAL SITE DESCRIPTION

The Project Site is located at Siu Ho Wan in North Lantau with an area of about 2 hectares. The layout of the Project Site is illustrated in *Annex A*. The facility received an average of 139.33 to 144.23 tonnes and treated an average of 121.87 to 124.72 tonnes of source separated organic waste per day during the reporting period.

2.3 MAJOR ACTIVITIES UNDERTAKEN

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

Table 2.1 Summary of Activities Undertaken in the Reporting Period

Activities Undertaken in the Reporting Period

- Systems being operated waste reception, pre-treatment, CAPCS extraction, the
 digesters, the centrifuge, the composting tunnels, the de-sulphurisation, the emergency
 flare, the CHPs, the ASP and the biological waste water treatment plant (405.43 t/d
 SSOW received);
- E50 Service for CHP 2 (overhaul works) was completed with testing and commissioning;
- Emergency repair works for the ECU (heat exchanger) for the ASP was conducted;
- Four points calibration and adjustment was conducted for the CEMS;
- Steam Generator tube bundle replacement and ECU cassette replacement were completed;
- The VOC sensor for CAPCS was installed in this reporting period, while further modification is still recommended;
- Biogas booster replacement was conducted; and
- Setting adjustments of the CHP 2 engine were conducted to fine tune and return the maximum loading of the engine to 1,500 kW

2.4 PROJECT ORGANISATION AND MANAGEMENT STRUCTURE

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

2.5 STATUS OF ENVIRONMENTAL APPROVAL DOCUMENTS

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

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

Table 2.2 Summary of Environmental Licensing, Notification and Permit Status

Permit/ Licences/ Notification	Reference	Validity Period	Remarks
Environmental Permit	FEP-01/395/2010/C	Throughout the Contract	Permit granted on 21 December 2015
Effluent Discharge License	WT00038391-2021	7 July 2021 – 30 June 2026	Approved on 7 July 2021
Chemical Waste Producer Registration	WPN 5213-961- O2231-02	Throughout the implementation of the Project	Approved on 10 November 2017
Waste Disposal Billing Account	Account number: 702310	Throughout the Contract	-

3 ENVIRONMENTAL MONITORING AND AUDIT REQUIREMENTS

3.1 ENVIRONMENTAL MONITORING

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

3.1.1 Air Quality

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

On-line monitoring (using continuous environmental monitoring system (CEMS) shall be carried out for the centralised air pollution unit (CAPCS), cogeneration units (CHP) and the ammonia stripping plant (ASP) during the operation phase. The last calibration was carried out on November 2022.

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

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

Table 3.1 Sampling and Laboratory Analysis Methodology

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

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

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

Table 3.2 Emission Limit for CAPCS Stack

Parameter	Emission Level (mg/Nm³) (a)
VOCs (including methane)	680
Dust (or Total Suspended Particulates (TSP))	6
Odour (including NH ₃ & H ₂ S)	220 (b)
Notes:	
(a) Hourly average concentration	
(b) The odour unit is OU/Nm³	

Table 3.3 Emission Limit for CHP Stack

Parameter	Maximum Emission Level (mg/Nm³) (a) (b)	
Dust (or Total Suspended Particulates)	15	
Carbon Monoxide	650	
NO _x	300	
SO_2	50	
NMVOCs (c)	150	
VOCs (including methane) (d)	1,500	
HCl	10	
HF	1	

Notes:

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

Table 3.4 Emission Limit for ASP Stack

Parameter	Maximum Emission Level (mg/Nm³) ^{(a) (b)}
Dust (or Total Suspended Particulates)	5
Carbon Monoxide	100
NOx	200
SO ₂	50
VOCs (including methane) (c)	20
NH ₃	35
HCl	10
HF	1

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

Table 3.5 Emission Limit for Standby Flaring Gas Unit (1)

Parameter	Maximum Emission level (mg/Nm³) (a) (b)
Dust (or Total Suspended Particulates)	5
Carbon Monoxide	100
NO_x	200
SO_2	50
VOCs (including methane) (c)	20
HCl	10
HF	1

Notes:

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

3.1.2 *Odour*

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

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

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

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

Table 3.6 Odour Intensity Level

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

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

Table 3.7 Action and Limit Levels for Odour Nuisance

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

Note:

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

Table 3.8 Event and Action Plan for Odour Monitoring

Event	Action	
	Person-in-charge of Odour Monitoring	Project Proponent (a)
Action Level		
Exceedance of action level (Odour Patrol)	1. Identify source/reason of exceedance; 2. Repeat odour patrol to confirm finding.	 Carry out investigation to identify the source/reason of exceedance. Investigation should be completed within 2 weeks; Rectify any unacceptable practice; Implement more mitigation measures if necessary; Inform Drainage Services Department (DSD) or the operator of the Siu Ho Wan Sewage Treatment Works (SHWSTW) if exceedance is considered to be caused by the operation of the SHWSTW. Inform North Lantau Refuse Transfer Station (NLTS) operator if exceedance is considered to be caused by the operation
		of NLTS.

Exceedance of action level (Odour Complaints)	 Identify source/reason of exceedance; Carry out odour patrol to determinate odour intensity. 	 Carry out investigation and verify the complaint whether it is related to potential odour emission from the nearby SHWSTW; Carry out investigation to identify the source/reason of exceedance. Investigation should be completed within 2 weeks;
		3. Rectify any unacceptable practice;
		4. Implement more mitigation measures if necessary;
		5. Inform DSD or the operator of the SHWSTW if exceedance is considered to be caused by the operation of the SHWSTW.
		6. Inform NLTS operator if exceedance is considered to be caused by the operation of NLTS.
Limit Level		
Exceedance of 1 imit level	 Identify source/reason of exceedance; Inform EPD; Repeat odour patrol to confirm findings; Increase odour patrol frequency to bi-weekly; Assess effectiveness of remedial action and keep EPD informed of the results; If exceedance stops, cease additional odour patrol. 	 Carry out investigation to identify the source/reason of exceedance. Investigation should be completed within 2 week; Rectify any unacceptable practice; Formulate remedial actions; Ensure remedial actions properly implemented; If exceedance continues, consider what more/enhanced mitigation measures should be implemented; Inform DSD or the operator of the SHWSTW if exceedance is considered to be

(a) Project Proponent shall identify an implementation agent.

3.2 SITE AUDIT

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

3.2.1 Water Quality

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

Table 3.9 Discharge Limits for Effluent from the Effluent Storage Tank (as stipulated in WT00038391-2021)

Parameters	Discharge Limit (mg/L)
Flow Rate (m ³ /day) (a)	645
pH (pH units) (b)	6-10 (c)
Suspended Solids (b)	800
Biochemical Oxygen Demand (5 days, 20°) (b)	800
Chemical Oxygen Demand (b)	2,000
Oil & Grease (b)	40
Total Nitrogen (b)	200
Total Phosphorus (b)	50
Surfactants (total) (b)	25

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

Table 3.10 Discharge Limits for Effluent from the Petrol Interceptor(s) (as stipulated in WT00038391-2021)

Parameters	Discharge Limit (mg/L)
Flow Rate (m ³ /day)	245 (a)
Suspended Solids (b)	30
Chemical Oxygen Demand (c)	80
Oil & Grease (c)	20
Surfactants (total) (b)	15

Notes:

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

3.2.2 Landscape and Visual

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

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

4 MONITORING RESULTS

4.1 AIR QUALITY

4.1.1 Operation Phase Monitoring

The concentrations of concerned air pollutants emitted from the stacks of the CAPCS, CHP, and ASP during the reporting period are monitored on-line by the continuous environmental monitoring system (CEMS). During the reporting period, the standby flare operated on 31 October 2022.

With reference to the emission limits shown in *Tables 3.2, 3.3, 3.4 and 3.5*, the hourly average concentrations and the number of exceedances of the concerned air emissions monitored for the CAPCS, CHP, ASP and the Standby Flare Gas Unit during this reporting period are presented in *Tables 4.1* to *4.6*.

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

Table 4.1 Hourly Average of Parameters Recorded for CAPCS

Parameter	Range of Hourly Average Conc. (mg/Nm³)	Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
VOCs (including methane)	0.00 - 675.20	680	Nil	Nil
Dust (or TSP)	0.00 - 0.15	6	Nil	Nil
Odour (including NH ₃ & H ₂ S) ^(a)	0.00 - 194.60	220	Nil	Nil
Note:				
(a) The odour unit	is OU/Nm ³ .			

Table 4.2 Hourly Average of Parameters Recorded for CHP 1

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
Dust (or TSP)	0 - 15	15	Nil	Nil
Carbon Monoxide	0 - 256	650	Nil	Nil
NO _x	0 – 500	300	Identified (c)	System unstable (e.g. low efficiency, unstable column temperature)
SO ₂	0 – 101	50	Identified (d)	De-sulphurisation system tripped / Under Maintenance
VOCs (including methane) (b)	0 – 1,500	1,500	Nil	Nil

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
HCl	0 - 7	10	Nil	Nil
HF	0 - 0	1	Nil	Nil

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with exceedances on NO $_x$ (number of exceedance on the day) were identified on 1 (15), 2 (5), 3 (20), 4 (17), 5 (16), 6 (23), 7 (23), 8 (24), 9 (15), 10 (9), 11 (11), 14 (6), 15 (8), 16 (24), 17 (22), 18 (24), 19 (24), 20 (24), 21 (20), 22 (2), 23 (21), 24 (21), 25 (24), 26 (20), 27 (14) and 28 (9) October 2022; 3 (9), 4 (21), 5 (1), 8 (1), 9 (6), 10 (9), 11 (3), 12 (8), 13 (10), 14 (4), 15 (7), 16 (12), 17 (9), 18 (16), 19 (15), 20 (12), 21 (5), 22 (13), 23 (8), 24 (4) and 25 (2) November 2022.
- (d) Dates with exceedances on SO₂ (number of exceedance on the day) were identified on 17 (12) and 18 (10) October 2022; 16 (8) and 18 (6) November 2022.

Table 4.3 Hourly Average of Parameters Recorded for CHP 2

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedance Identified	Remarks
Dust (or TSP)	0 - 10	15	Nil	Nil
Carbon Monoxide	0 - 176	650	Nil	Nil
NO _x	0 - 498	300	Identified (c)	System unable (e.g. low efficiency, unstable column temperature)
SO ₂	0 - 220	50	Identified (d)	De-sulphurization system tripped / Under Maintenance
VOCs (including methane) (b)	0 - 1,367	1,500	Nil	Nil
HCl	0 - 14	10	Identified (e)	System unstable (e.g. low efficiency, unstable column temperature)
HF	0 - 0	1	Nil	Nil

Notes:

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with exceedances on NO_x (number of exceedance on the day) were identified on 17 (6), 18 (3), 19 (1), 22 (1), 26 (2), 27 (2), 28 (2), 29 (4), 30 (2) and 31 (10) October 2022; 1 (16), 2 (16), 3 (14), 4 (4), 5 (10), 6 (19), 7 (14), 8 (15), 9 (6), 10 (4), 11 (3), 12 (5), 14 (7), 15 (19), 16 (13), 17 (24), 18 (24), 19 (22), 20 (21), 21 (23), 22 (24), 23 (18), 24 (24), 25 (24), 26 (24), 27 (24), 28 (16), 29 (24) and 30 (14) November 2022.
- (d) Dates with exceedances on SO₂ (number of exceedance on the day) were identified on 3 (1), 8 (1), 10 (3), 11 (11), 12 (8), 15 (17), 16 (17), 17 (22), 18 (13), 19 (14) and 26 (1) October 2022; 1 (5), 5 (9), 6 (11), 7 (13), 8 (5), 9 (6), 10 (3), 11 (1), 15 (8), 16 (8), 17 (24), 18 (19), 19 (4), 20 (2), 21 (12), 22 (6), 23 (10), 24 (23), 25 (23), 26 (24), 27 (24), 28 (16), 29 (23) and 30 (17) November 2022.
- (e) Dates with exceedances on HCl (number of exceedance on the day) were identified on 24 (1) November 2022.

Table 4.4 Hourly Average of Parameters Recorded for CHP 3

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks
Dust (or TSP)	0 – 6	15	Nil	Nil
Carbon Monoxide	0 - 230	650	Nil	Nil
NO _x	0 - 483	300	Identified (c)	System unstable (e.g. low efficiency, unstable column temperature)
SO ₂	0 - 184	50	Identified (d)	De-sulphurisation system tripped / Under Maintenance
VOCs (including methane) (b)	0 - 953	1,500	Nil	Nil
HCl	0 – 5	10	Nil	Nil
HF	0 - 1	1	Nil	Nil

- (a) All values refer to an oxygen content in the exhaust gas of 6% and dry basis.
- (b) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.
- (c) Dates with exceedances on NO_x (number of exceedances on the day) were identified on 15 (3), 16 (1), 17 (5), 18 (3), 19 (7), 20 (9) and 31 (13) October 2022; 1 (22), 2 (15), 4 (5), 10 (5), 14 (3), 15 (1) and 16 (7) November 2022.
- (d) Date with exceedances on SO₂ (number of exceedance on the day) was identified on 15 (3), 16 (1), 17 (6), 18 (3), 19 (8) and 20 (9) October 2022; 1 (3), 10 (1) and 16 (5) November 2022.

Table 4.5 Hourly Average of Parameters Recorded for ASP

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks
Dust (or TSP)	0 - 5	5	Nil	Nil
Carbon Monoxide	0 – 79	100	Nil	Nil
NOx	0 – 228	200	Identified (c)	System unstable (e.g. low efficiency, unstable column temperature)
SO ₂	0 - 50	50	Nil	Nil
VOCs (including methane) (b)	0 - 13	20	Nil	Nil
NH ₃	0 – 50	35	Identified (d)	System unstable (e.g. low efficiency, unstable column temperature)
HCl	0 - 7	10	Nil	Nil
HF	0 - 1	1	Nil	Nil

Notes:

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

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

⁽c) Date with exceedances on NO_x (number of exceedances on the day) were identified on 9 (1) October 2022.

Table 4.6 Hourly Average of Parameters Recorded for the Standby Flaring Gas Unit

Parameter	Range of Hourly Average Conc. (mg/Nm³) (a)(c)	Max. Emission Limit (mg/Nm³)	Exceedances Identified	Remarks
Dust (or TSP)	0 - 0	5	Nil	Nil
Carbon Monoxide (d)	0 - 0	100	Nil	Nil
NOx	0 - 67	200	Nil	Nil
SO_2	0 - 0	50	Nil	Nil
VOCs (including methane) (b) (d)	0 - 0	20	Nil	Nil
HCl	0 - 0	10	Nil	Nil
HF (d)	0 - 0	1	Nil	Nil

- (a) All values refer to an oxygen content in the exhaust gas of 11% and dry basis.
- (b) The VOCs emission limit include methane as biogas is adopted as fuel in the combustion process.
- (c) During the reporting period, the standby flare operated on 31 October 2022.
- (d) During this reporting period, several flare test trials were conducted for preparing the biogas booster replacement. The exceedances recorded under interference of the test trials were disregarded.

4.2 ODOUR

4.2.1 Operation Phase Monitoring

Odour patrols were conducted by the independent odour patrol team of ALS Technichem (HK) Pty Ltd on 9 and 22 September 2022. According to the EM&A Manual and EP requirements, it is considered an exceedance if the odour intensity recorded by the panellists is Level 2 or above. During this reporting period, no Level 2 Odour Intensity was recorded. The odour patrol result is shown in Annex G.

4.3 WATER QUALITY

4.3.1 Operation Phase Monitoring

Effluent discharge was sampled from the outlet chamber of the Effluent Storage Tank monthly and from the Petrol Interceptor(s) bi-monthly as stipulated in the operation phase discharge licence. The results of the discharge samples from the Effluent Storage Tank are recorded in *Table 4.7* to

⁽d) Dates with exceedances on NH_3 (number of exceedances on the day) were identified on 2 (1) and 3 (4) October 2022.

4.9. The results of the discharge samples from the Petrol Interceptors are recorded in *Table 4.10* to 4.12.

Table 4.7 Results of the Discharge Sample Collected from the Outlet Chamber of the Effluent Storage Tank in September 2022

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Flow Rate (m ³ /day) (a)	0 - 228 (e)	645	Yes
pH (pH units) (b)	7.64 - 8.04 (e)	6-10 (c)	Yes
Suspended Solids (b) (d)	114 (d)	800	Yes
Biochemical Oxygen Demand (5 days, 20°) (b) (d)	65 (d)	800	Yes
Chemical Oxygen Demand (b) (d)	775 ^(d)	2,000	Yes
Oil & Grease (b) (d)	<5 (d)	40	Yes
Total Nitrogen (b) (d)	102 (d)	200	Yes
Total Phosphorus (b) (d)	34.2 (d)	50	Yes
Surfactants (total) (b) (d)	1.4 ^(d)	25	Yes

Notes:

- (a) Parameter not required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Daily Range.
- (d) Effluent sample collected on 8 September 2022.
- (e) Data collected daily in the reporting period.

Table 4.8 Results of the Discharge Sample Collected from the Effluent Storage Tank in October 2022

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Flow Rate (m ³ /day) (a)	11 - 225 (e)	645	Yes
pH (pH units) (b)	6.82 - 8.1 (e)	6-10 (c)	Yes
Suspended Solids (b) (d)	143 (d)	800	Yes
Biochemical Oxygen Demand (5 days, 20°) (b) (d)	47 (d)	800	Yes
Chemical Oxygen Demand (b) (d)	867 (d)	2,000	Yes
Oil & Grease (b) (d)	<5 (d)	40	Yes
Total Nitrogen (b) (d)	64.3 (d)	200	Yes
Total Phosphorus (b) (d)	33.4 (d)	50	Yes
Surfactants (total) (b) (d)	1.4 ^(d)	25	Yes

Notes:

- (a) Parameter not required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Daily Range.
- (d) Effluent sample collected on 7 October 2022.
- (e) Data collected daily in the reporting month.

Table 4.9 Results of the Discharge Sample Collected from the Effluent Storage Tank in November 2022

Parameters	Discharged Effluent Concentration (mg/L)	Discharge Limit (mg/L)	Compliance with Discharge Limit
Flow Rate (m ³ /day) (a)	0 - 182 (e)	645	Yes
pH (pH units) (b)	7.39 – 8.5 (e)	6-10 (c)	Yes
Suspended Solids (b) (d)	83 (d)	800	Yes
Biochemical Oxygen Demand (5 days, 20°) (b) (d)	19 (d)	800	Yes
Chemical Oxygen Demand (b) (d)	693 ^(d)	2,000	Yes
Oil & Grease (b) (d)	<5 (d)	40	Yes
Total Nitrogen (b) (d)	68.8 ^(d)	200	Yes
Total Phosphorus (b) (d)	20.5 (d)	50	Yes
Surfactants (total) (b) (d)	<1.0 (d)	25	Yes

- (a) Parameter not required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (b) Parameters required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Daily Range.
- (d) Effluent sample collected on 10 November 2022.
- (e) Data collected daily in the reporting month.

Table 4.10 Results of the Discharge Sample from the Petrol Interceptor 1 on 19 October 2022

Parameters	Discharged Effluent Concentration (mg/L)	· ·	Compliance with Discharge Limit
Suspended Solids (b)	26 (a)	30	Yes
Chemical Oxygen Demand (c)	72 (a)	80	Yes
Oil & Grease (c)	<5 (a)	20	Yes
Surfactants (total) (b)	<1.0 (a)	15	Yes

Notes:

- (a) Effluent sample collected on 19 October 2022.
- (b) Parameter not required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.

Table 4.11 Results of the Discharge Sample from the Petrol Interceptor 2 on 1 September 2022

Parameters	Discharged Effluent Concentration (mg/L)	•	Compliance with Discharge Limit
Suspended Solids (b)	6 (a)	30	Yes
Chemical Oxygen Demand (c)	36 (a)	80	Yes
Oil & Grease (c)	<5 (a)	20	Yes
Surfactants (total) (b)	<1.0 (a)	15	Yes

- (a) Effluent sample collected on 1 September 2022.
- (b) Parameter not required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.

Table 4.12 Results of the Discharge Sample from the Petrol Interceptor 2 on 19 October 2022

Parameters	Discharged Effluent Concentration (mg/L)	•	Compliance with Discharge Limit
Suspended Solids (b)	7 (a)	30	Yes
Chemical Oxygen Demand (c)	22 (a)	80	Yes
Oil & Grease (c)	<5 (a)	20	Yes
Surfactants (total) (b)	<1.0 (a)	15	Yes

Notes:

- (a) Effluent sample collected on 19 October 2022.
- (b) Parameter not required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.
- (c) Parameters required to be reported in accordance to Section B2 of the Effluent Discharge Licence under the WPCO.

No exceedance of discharge limit was recorded during the reporting period.

4.4 WASTE MANAGEMENT

4.4.1 Operation Phase Monitoring

Wastes generated from the operation of the Project include chemical waste, wastes generated from pre-treatment process and general refuse ⁽¹⁾. Reference has been made to the Monthly Summary Waste Flow Table prepared by the Contractor (see *Annex D*). With reference to the relevant handling records and trip tickets of this Project, the quantities of different types of waste generated from the operation of the Project in the reporting period are summarised in *Table 4.13*.

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

Table 4.13 Quantities of Waste Generated from the Operation of the Project

Month/Year	Chemical Waste	Waste Generated from Pre-treatment Process		General Refuse	2
	Disposal of at CWTC (e)	Disposed of at Landfill (a)	Recycled (b)	Disposed of at Landfill (a) (c)	Recycled (d)
September 2022	0 L	476.92 tonnes	0.00 tonnes	2.42 tonnes	0.000 tonne
October 2022	0 L	615.87 tonnes	0.00 tonnes	2.76 tonnes	0.000 tonne
November 2022	0 L	585.38 tonnes	0.00 tonnes	3.00 tonnes	0.075 tonne

- (a) Waste generated from pre-treatment process and general refuse other than chemical waste and recyclables were disposed of at NENT landfill by sub-contractors.
- (b) Among waste generated from pre-treatment process, 0.000 tonne of metals, 0.000 tonne of papers/ cardboard packing and 0.000 tonne of plastics were sent to recyclers for recycling during the reporting period.
- (c) It was assumed that four 240-litre bins filled with 80% of general refuse were collected at each collection. The general refuse density was assumed to be around 0.15~kg/L.
- (d) Among general refuse, 0.020 tonnes of metals, 0.035 tonnes of papers/ cardboard packing and 0.020 tonnes of plastics were sent to recyclers for recycling during the reporting period.
- (e) No chemical waste was generated in this reporting period.

5 SITE AUDIT

5.1 ENVIRONMENTAL SITE AUDIT

5.1.1 *Operation Phase*

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

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

September 2022

The monthly inspection of the operation phase of the Project on 27 September 2022 covered the operation phase environmental site audit. Joint site inspections was conducted by representatives of the Contractor, IEC and the MT on 27 September 2022 as required for the operation of the Project.

October 2022

The monthly inspection of the operation phase of the Project on 26 October 2022 covered the operation phase environmental site audit. Joint site inspections was conducted by representatives of the Contractor, IEC and the MT on 26 October 2022 as required for the operation of the Project.

November 2022

The monthly inspection of the operation phase of the Project on 29 November 2022 covered the operation phase environmental site audit. Joint site inspection was conducted by representatives of the Contractor, IEC and the MT on 29 November 2022 as required for the operation of the Project.

5.2 LANDSCAPE AND VISUAL AUDIT

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

September 2022

Monthly inspection of the landscape and visual mitigation measures for the operation phase of the Project was performed on 27 September 2022.

October 2022

Monthly inspection of the landscape and visual mitigation measures for the operation phase of the Project was performed on 26 October 2022.

November 2022

Monthly inspection of the landscape and visual mitigation measures for the operation phase of the Project was performed on 29 November 2022.

6 ENVIRONMENTAL NON-CONFORMANCE

6.1 SUMMARY OF ENVIRONMENTAL NON-COMPLIANCE

September 2022

No non-compliance and deficiencies were recorded in September 2022.

October 2022

Non-compliance of emission limits of NO_x and SO_2 from the CHPs and NO_x and NH_3 from ASP were recorded in October 2022.

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

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

November 2022

Non-compliance of emission limits of SO₂, NO_x and HCI from the CHPs were recorded in November 2022.

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

The Investigation Reports of the above exceedances are presented in *Annex F*.

6.2 SUMMARY OF ENVIRONMENTAL COMPLAINT

No complaint was received during the reporting period.

6.3 SUMMARY OF ENVIRONMENTAL SUMMON AND SUCCESSFUL PROSECUTION

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

7 FUTURE KEY ISSUES

7.1 KEY ISSUES FOR THE COMING REPORTING PERIOD

Activities to be undertaken for the coming reporting period are:

- Operation of the Project;
- Additional setting adjustments of CHP2; and
- Further testing in preparation of the Biogas Holder replacement works.

8 CONCLUSIONS

This EM&A Report presents the EM&A programme undertaken during the reporting period from **1 September 2022** to **30 November 2022** in accordance with EM&A Manual (Version F) and requirements of EP (FEP-01/395/2010/C).

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

Table 8.1 Exceedances for Stack Emissions

Stack	Exceedances During the Reporting Period	
Cogeneration Unit 1 (CHP1)	 Exceeded emission limit of NO_x on 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27 and 28 October 2022; 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24 and 25 November 2022. 	
	 Exceeded emission limit of SO₂ on 17 and 18 October 2022; 16 and 18 November 2022. 	
Cogeneration Unit 2 (CHP2)	 Exceeded emission limit of NO_x on 17, 18, 19, 22, 26, 27, 28, 29, 30, and 31 October 2022; 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29 and 30 November 2022 	
	• Exceeded emission limit of SO ₂ on 3, 8, 10, 11, 12, 15, 16, 17, 18, 19 and 26 October 2022; 1, 5, 6, 7, 8, 9, 10, 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29 and 30 November 2022.	
Cogeneration Unit 3 (CHP3)	 Exceeded emission limit of NO_x on 15, 16, 17, 18, 19 and 20 October 2022; 1, 2, 4, 10, 14, 15 and 16 November 2022. 	
	 Exceeded emission limit of SO₂ on 15, 16, 17, 18, 19 and 20 October 2022; 1, 10 and 16 November 2022. 	
Ammonia Stripping Plant	• Exceeded emission limit of NO _x on 9 October 2022.	
(ASP)	• Exceeded emission limit of NH ₃ on 2 and 3 October 2022.	

The exceedances of SO₂ from CHPs occurred due to tripping of the desulphurisation system caused by the failure of one of the columns of the system. The exceedances of NOx from CHPs occurred due to insufficient feedstock and system unstability. The exceedance of HCl from CHP 2 occurred due to system instability caused by the ongoing performance optimisation of the CHP 2, resulting in a lowered temperature of the system and the incomplete combustion of biogas. The exceedance of NH₃ and NOx from ASP occurred due to system instability caused by the ongoing performance optimisation of the ASP, resulting in a lowered temperature of the system and the incomplete combustion of biogas.

No non-compliance to the effluent discharge limit was recorded during this reporting period.

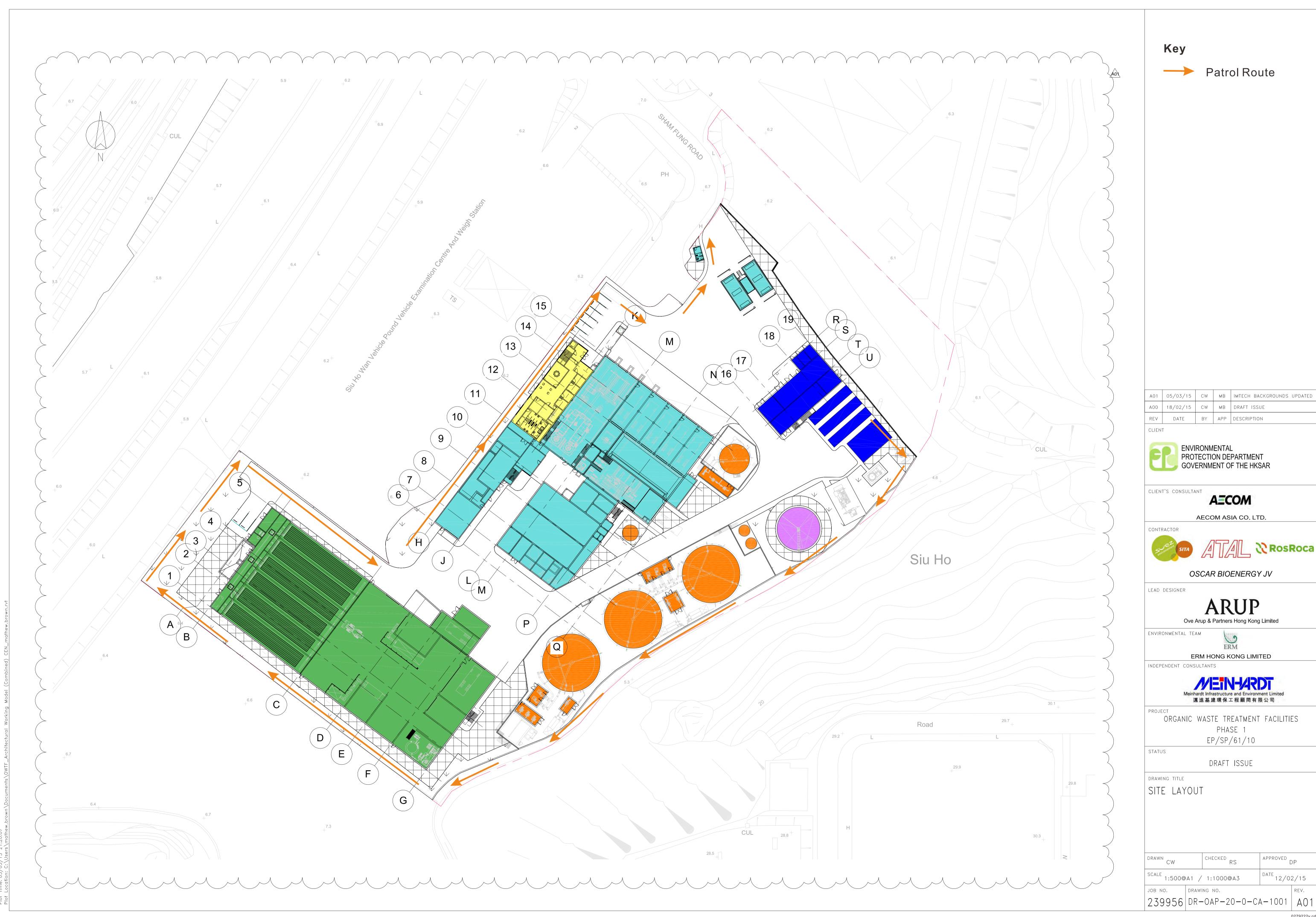
The environmental control /mitigation measures related to air quality, water quality, waste (including land contamination prevention), hazard-to-life and landscape and visual recommended in the approved EIA Report and the EM&A Manual were properly implemented by the Contractor during the reporting period.

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

No complaint/summon/prosecution was received.

Annex A

Project Layout

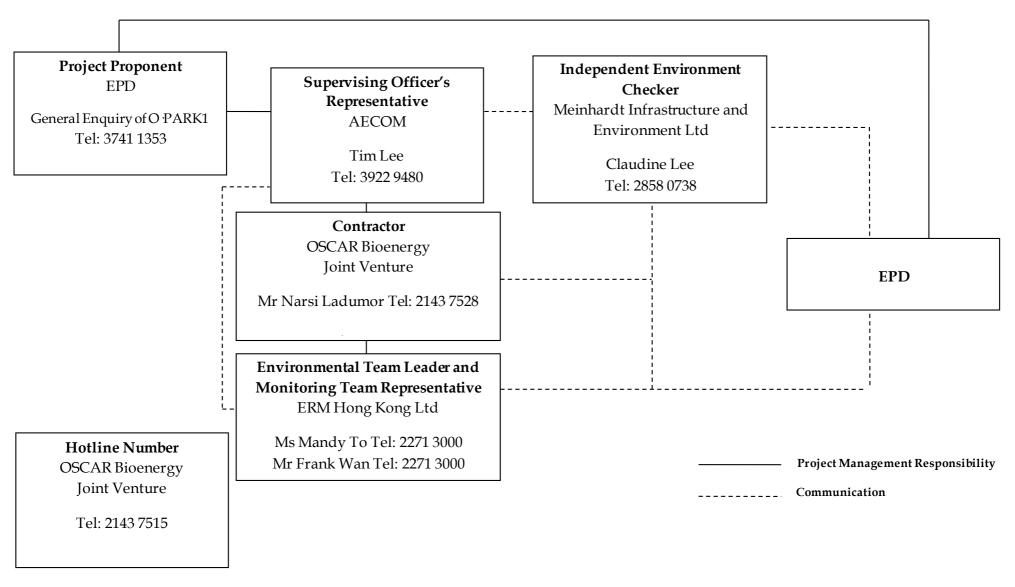


0279222v.cdr

Annex B

Project Organisation Chart with Contact Details

Project Organization (with contact details)



Annex C

Implementation Schedule of Mitigation Measures

Annex C Summary of Mitigation Measures Implementation Schedule for Operation Phase

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
Summary o	of Environmenta	nl Mitigation Measures in the EIA and EM&A Manual		
A. A	ir Quality			
3.78	2.7 & 2.13 - 2.19	Air Pollution Control (Construction Dust) Regulation & Good Site Practices	OWTF Stacks/ During Commissioning Stage	\vee
		 Commissioning tests shall be conducted to confirm the centralized air pollution control unit, the cogen units, the standby flaring unit and ASP against the design emission levels as stated in Tables 2.2 - 2.5. Odour monitoring shall be conducted at the stack exhaust of the centralized air pollution 	Commissioning Stage	
		control unit weekly in the first month of the commissioning stage.		
3.78	2.7-2.12	Air Pollution Control and Stack Monitoring •Stack monitoring shall be installed for the centralized air pollution control unit, cogen units and ASP of OWTF to ensure that the air emissions from OWTF would meet the design emission limits as well as EPD criteria.	During Operation	√
3.78	2.20- 2.28	Odour Patrol at site boundary of OWTF	OWTF Site Boundary/During Operation (The need to continue the odour patrol after the end of the 2-year monitoring period would depend on the monitoring results and should be agreed with EPD)	√
В. Н	lazard to Life			
4.103	3.4	•3m high fence should be constructed along the boundary facing the SHWWTW •Emergency evacuation procedures should be formulated and the Contractor should ensure on site staff should be familiar with these procedures. Diagram showing the escape routes to a safe place should be posted in the site notice boards and at the entrance/exit of site. A copy of the latest version emergency procedures should be dispatched to Tung Chung Fire Station for reference once available.	Work Site / During Operation Period	1
		•The emergency procedures should specify means of providing a rapid and direct warning		

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
		(e.g. Siren and Flashing Light) to personnel on site in the event of chlorine gas release in the SHWWTW.		
		 The Contractor should establish a communication channel with the SHWWTW operation personnel and FSD. In case of any hazardous incidents in the treatment works, operation personnel of SHWWTW should advise the Contractor to inform personnel on site to proceed with emergency procedure. The Contractor should appoint a Liaison Officer to communicate with FSD Incident Commander on site in case of emergency. Periodic drills should be coordinated and conducted to ensure all on site personnel are familiar with the emergency procedures. Upon completion of the drills, a review on every step taken should be conducted to identify area of improvement. Prior notice of periodic drills should be given to Station Commander of Tung Chung Fire Station. Joint operational exercise 		
		with FSD and SHWWTW is recommended.		
С. И	Vater Quality	-	,	
5.44	4.5	Wastewater from Organic Waste Treatment Process The Project site will be equipped with an adequately sized wastewater treatment plant. A high rate type of active sludge system specifically designed for the removal of nitrogen components from the wastewater in combination with conversion of residual BOD and COD would be deployed. The wastewater treatment plant would also be incorporated with SHARON or annamox technology or equivalent to achieve high total overall nitrogen removal. Wastewater generated from the OWTF (including wastewater from dewatering process, leachate from waste reception area, condensate from biogas handling, wastewater from scrubber of air treatment system and any surplus water from truck washing facility) will be diverted to the wastewater treatment plant. Treated effluent will then be stored temporarily in order to be used as process water within the plants. The storage volume would be around 20 m3. Overflow from the tank will be discharged to foul sewers. The polluting parameters in effluent shall be in compliance with the requirements specified in the TM- DSS. The design, installation and operation of the wastewater treatment plant shall be licensed under the Waste Disposal Ordinance and subject to the effluent monitoring as required under the WPCO which is under the ambit of regional office (RO) of EPD. To ensure that wastewater can be adequately treated and effluent from treatment plant can meet the standards listed in TM- DSS, the following mitigation measure should be conducted. • Cleaning and maintenance of treatment facilities should be conducted on a regular basis to ensure that removal rate of each treatment facility would not be reduced. • Cleaning and maintenance of pipelines should be carried out on a regular basis to	Work Site / During Design & Operation Period	

CSCAR BIOENERGY JOINT-VENTURE

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
		 prevent block of pipeline and leaching of wastewater, and therefore prevent overflowed or leached wastewater discharging into nearby drainages and water streams. Regular site inspection should be conducted to ensure that no wastewater can be directly discharged into nearby water streams. 		
5.55	4.5	In the scrubber, spraying water should be re-circulated to minimize the need for external water. The spraying water would be collected at the bottom of the scrubber. Excess water would be discharged to the wastewater treatment plant as described in Section 5.54.	Work Site / During Design & Operation Period	√
5.56	4.5	The waste reception, treatment facilities and compost storages of OWTF should be located in enclosed buildings to prevent generation of contaminated rain runoff. All surface runoff such as washed water generated in the treatment processes areas should be properly collected and diverted to the on-site wastewater treatment plant as described in Section 5.54.	Work Site / During Design & Operation Period	√
5.57	4.5	All drainage system for collection and transferring wastewater generated in the OWTF to the on- site wastewater treatment plant as described in Section 5.54 should be capable of preventing clogging and easy maintenance and cleaning.	Work Site / During Design & Operation Period	√
D. W	Vaste Managem	nent		
6.50	5.12	Good operational practices should be adopted to Minimize waste management impacts: •Obtain the necessary waste disposal permits from the appropriate authorities, in accordance with the Waste Disposal Ordinance (Cap. 354), Waste Disposal (Chemical Waste) (General) Regulation and the Land (Miscellaneous Provision) Ordinance (Cap. 28); •Nomination of an approved person to be responsible for good site practice, arrangements for collection and effective disposal to an appropriate facility of all wastes generated at the site; •Use of a waste haulier licensed to collect specific category of waste; •A trip-ticket system should be included as one of the contractual requirements and implemented by the Environmental Team to monitor the disposal of solid wastes at public filling facilities and landfills, and to control fly tipping. Reference should be made to ETWB TCW No. 31/2004. •Training of site personnel in proper waste management and chemical waste handling procedures;	During Operation Period	
		•Separation of chemical wastes for special handling and appropriate treatment at a licensed facility; •Routine cleaning and maintenance programme for drainage systems, sumps and oil		

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
		interceptors;		
		•Provision of sufficient waste disposal points and regular collection for disposal;		
		•Adoption of appropriate measures to minimize windblown litter and dust during		
		transportation of waste, such as covering trucks or transporting wastes in enclosed containers;		
		and		
		•Implementation of a recording system for the amount of wastes generated, recycled and		
		disposed of (including the disposal sites).		
6.51	5.13	Waste Reduction Measures	During Operation Period	√
		Good management and control can prevent the generation of significant amounts of waste. It is		
		recommended that the following good operational practices should be adopted to ensure waste		
		reduction:		
		•Segregation and storage of different types of waste in different containers, skips or stockpiles		
		to enhance reuse or recycling of materials and their proper disposal;		
		•Encourage collection of aluminum cans, plastic bottles and packaging material (e.g. carton		
		boxes) and office paper by individual collectors. Separate labelled bins should be provided to		
		help segregate this waste from other general refuse generated by the work force; and		
		•Any unused chemicals or those with remaining functional capacity should be reused as far as		
		practicable.		
6.52	5.14	Wastes Generated from Pre-Treatment Process	Pre-Treatment Process/ During	$\sqrt{}$
		Wastes generated from pre-treatment process should be recycled as far as possible. Wastes	Operation Period	
		generated from pre- treatment process should also be separated from any chemical waste and		
		stored in covered skips. The recyclables should be collected by licensed collectors, while the rest		
		of the waste should be removed from the site on a daily basis to minimize odour, pest and litter		
6.53-6.56	5.15-5.18	impacts. Open burning must be strictly prohibited. <u>Chemical Wastes</u>	Mileala Cita / Duning On anation	√
0.55-0.50	3.13-3.16		Whole Site / During Operation Period	V
		•Chemical waste generated from machinery maintenance and servicing should be managed in	Teriod	
		accordance with Code of Practice on the Packaging, Labelling and storage of Chemical Wastes		
		under the provisions of Waste Disposal (Chemical Waste) (General) Regulation. The chemical		
		waste should be collected by drum-type containers and removed by licensed chemical waste contractors.		
		•Plant / equipment maintenance schedules should be planned in order to minimize the		
1		-1 tall / equipment maintenance schedules should be plantied in order to minimize the		

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
		generation of chemical waste.		
		•Non-recyclable chemical wastes and lubricants should be disposed of at appropriate facilities,		
		such as CWTC. Copies or counterfoils from collection receipts issued by the licensed waste		
		collector should be kept for recording purpose.		
		•Recyclable chemical waste will be transported off-site for treatment by a licensed collector. The		
		Contractor will need to register with EPD as a chemical waste producer. Where possible,		
		chemical wastes (e.g. waste lubricants) would be recycled at appropriate facilities, such as		
		Dunwell's oil re-refinery.		
6.57-6.58	5.19-5.20	General Refuse	Whole Site / During Operation	$\sqrt{}$
		•Waste generated in offices should be reduced through segregation and collection of recyclables.	Period	
		To promote the recycling of wastes such as used paper, aluminum cans and plastic bottles, it is		
		recommended that recycling bins should be clearly labelled and placed at locations with easy		
		access. For the collection of recyclable materials, they should be collected by licensed collectors.		
		•General refuse, other than segregated recyclable wastes, should be separated from any chemical		
		waste and stored in covered skips. The general refuse should be removed from the site on a		
		daily basis to minimize odour, pest and litter impacts. Also, open burning of refuse must be		
Е. Р	ronosed Land (strictly prohibited. Contamination Preventive Measures		
6.65	5.21 (i)	Fuel Oil Containers	Fuel Oil Storage Containers	√
	.,	•Fuel oil should be stored in suitable containers.	/During Operation Period	
		•All fuel oil containers should be securely closed.	, 0 1	
		•Appropriate labels showing the name of fuel oil should be posted on the containers.		
		•Drip trays should be provided for all containers.		
6.65	5.21 (ii)	Storage Area	Fuel Oil Storage Area / During	\checkmark
		•Distance between the fuel oil refuelling points and the fuel oil containers should be minimized.	Operation Period	
		•The storage area should be used for fuel oil storage only.		
		•No surface water drains or foul sewers should be connected to the storage area.		
		•The storage area should be enclosed by three sides by a wall and have an impermeable floor or		
		surface.		
6.65	5.21 (iii)	Fuel Oil Spillage Response	Whole Site / During Operation	√
		An Oil Spill Response Plan should be prepared by the operator to document the appropriate	Phase	

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
EIA Ref.		response procedures for oil spillage incident in detail. General procedures to be taken in case of fuel oil spillage are presented below. • Training Training on oil spill response actions should be given to relevant staff. The training should cover the followings: • Tools & resources to combat oil spillage and fire, e.g. locations of oil spill handling equipment and firefighting equipment; • General methods to deal with oil spillage and fire incidents; • Procedures for emergency drills in the event of oil spills and fire; and • Regular drills should be carried out. • Communication Establish communication channel with the Fire Services Department (FSD) and EPD to report any oil spillage incident so that necessary assistance from relevant department could be quickly sought. • Response Procedure Any fuel oil spillage within the Project Site should be immediately reported to the Site Manager with necessary details including location, source, possible cause and extent of the spillage Site Manager should immediately attend to the spillage and initiate any appropriate action to confine and clean up the spillage. The response procedures should include the following: • Identify and isolate the source of spillage as soon as possible. • Contain the oil spillage and avoid infiltration into soil / groundwater and discharge to storm water channels. • Remove the oil spillage. • Clean up the contaminated area.	Location/ Timing	Status
	5 22 (i)	 If the oil spillage occurs during refuelling, the refuelling operation should immediately be stopped. Recovered contaminated fuel oil and the associated material to remove the spilled oil should be considered as chemical waste. The handling and disposal procedures for chemical wastes are discussed in the following paragraphs. 	MI I C'I / D : O :	
6.66	5.22 (i)	Chemicals and Chemical Wastes Handling & Storage	Whole Site / During Operation	V

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
		 Chemicals and chemical wastes should only be stored in suitable containers in purpose-built areas. The storage of chemical wastes should comply with the requirements of the Code of Practice on the Packaging, Labelling and Storage of Chemical Wastes. The storage areas for chemicals and chemical wastes should have an impermeable floor or surface. The impermeable floor I surface should possess the following properties: Not liable to chemically react with the materials and their containers to be stored. Able to withstand normal loading and physical damage caused by container handling The integrity and condition of the impermeable floor or surface should be inspected at regular intervals to ensure that it is satisfactorily maintained For liquid chemicals and chemical wastes storage, the storage area should be bonded to contain at least 110% of the storage capacity of the largest containers or 20% of the total quantity of the chemicals/chemical wastes stored, whichever is the greater. Storage container should be checked at regular intervals for their structural integrity and to ensure that the caps or fill points are tightly closed. Chemical handling should be conducted by trained workers under supervision. 	Period	
6.66	5.22 (ii)	Chemicals and Chemical Wastes Spillage Response A Chemicals and / or Chemical Wastes Spillage Response Plan should be prepared by the operator to document in detail the appropriate response procedures for chemicals or chemical wastes spillage incidents. General procedures to be undertaken in case of chemicals I chemical waste spillages are presented below • Training • Training on spill response actions should be given to relevant staff. The training should cover the followings: - Tools & resources to handle spillage, e.g. locations of spill handling equipment; - General methods to deal with spillage; and - Procedures for emergency drills in the event of spills. • Communication Establish communication channel with Fire Services Department (FSD) and EPD to report the spillage incident so that necessary assistance from relevant department	Whole Site / During Operation Period	√

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
		could be quickly sought. Response Procedures Any spillage within OWTF site should be reported to the Site Manager. Site Manager shall attend to the spillage and initiate any appropriate actions needed to confine and clean up the spillage. The response procedures should include the followings: Identify and isolate the source of spillage as soon as possible; Contain the spillage and avoid infiltration into soil / groundwater and discharge to storm water channels (in case the spillage occurs at locations out of the designated storage areas); Remove the spillage; the removal method / procedures documented in the Material Safety Data Sheet (MSDS) of the chemicals spilled should be observed; Clean up the contaminated area (in case the spillage occurs at locations out of the designated storage areas); and The waste arising from the cleanup operation should be considered as chemical wastes.		
6.67 - 6.69	5.23- 5.25	 After any spillage, an incident report should be prepared by the Site Manager. The incident report should contain details of the incident including the cause of the incident, the material spilled and estimated spillage amount, and also the response actions undertaken. The incident record should be kept carefully and able to be retrieved when necessary. The incident report should provide sufficient details for the evaluation of any environmental impacts due to the spillage and assessment of the effectiveness of measures taken. In case any spillage or accidents results in significant land contamination, EPD should be informed immediately and the Project operator should be responsible for the cleanup of the affected area. The responses procedures described in Sections 6.65 - 6.66 of the EIA Report should be followed accordingly together with the land contamination assessment and remediation guidelines stipulated in the Guidance Manual for Use of Risk-based Remediation Goals for Contaminated Land Management and the Guidance Note for Contaminated Land Assessment and Remediation. 	Whole Site / During Operation Period	

EIA Ref.	EM&A	Environmental Protection Measures	Location/ Timing	Status
	Log Ref.			
7.98 &	Table 6.2	Operation Phase	Within Project Area / During	$\sqrt{}$
Table 7.8		Aesthetic design of the facade, including its colour theme, pattern, texture, materials,	Design & Operation Stages	
		finishing and associated structures to harmonize with the surrounding settings		
		Grass / groundcover planting to soften the roof		
		Heavy standard tree planting to screen proposed associated structures		
		Grasscrete paving to soften the harshness of large paved surface areas wherever		
		possible		

Remark:

- $\sqrt{}$ Compliance of Mitigation Measures
- Compliance of Mitigation but need improvement
- x Non-compliance of Mitigation Measures
- ▲ Non-compliance of Mitigation Measures but rectified by OSCAR Bioenergy JV
- Δ Deficiency of Mitigation Measures but rectified by OSCAR Bioenergy JV
- N/A Not Applicable in Reporting Period

Annex D

Waste Flow Table

No. EP/SP/61/10 of Organic Resources Recovery Centre (Phase 1) Monthly Summary Waste Flow Table

		Waste C	General Refuse											
Month	Chemical Waste	Disposed of at Landfill (see Note 1)	Metals (see Note 2)	Paper/ cardboard packaging (see Note 2)	Plastics (see Note 3)	Disposed of at Landfill (see Note 1 & 4)		Metals (se	ee Note 2)	_	Paper/ cardboard packaging (see Note 2)		Plastics (see Note 3)	
	Litre	tonne	tonne	tonne	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	No. of collection	tonne	
Mar-19	1,200	477.08	0	0	0	26	1.50	0	0	0	0	0	0.00	
Apr-19	0	455.60	0	0	0	22	1.27	0	0	0	0	0	0.00	
May-19	1,000	528.23	0	0	0	25	2.88	0	0	0	0	1	0.39	
Jun-19	0	459.23	0	0	0	24	2.76	0	0	0	0	0	0.00	
Jul-19	0	521.79	0	0	0	26	3.00	0	0	0	0	0	0.00	
Aug-19	40	441.05	0	0	0	27	3.11	0	0	0	0	0	0.00	
Sep-19	1,800	576.28	0	0	0	24	2.76	0	0	0	0	0	0.00	
Oct-19	0	441.22	0	0	0	25	2.88	0	0	0	0	0	0.00	
Nov-19	1,600	451.57	0	0	0	26	3.00	0	0	0	0	0	0.00	
Dec-19	1,009	488.13	0	0	0	24	2.76	0	0	0	0	0	0.00	
Jan-20	0	388.20	0	0	0	23	2.65	0	0	0	0	0	0.00	
Feb-20	4,525	372.97	0	0	0	24	2.76	0	0	0	0	0	0.00	
Mar-20	1,200	351.71	0	0	0	27	3.11	0	0	0	0	0	0.00	
Apr-20	0	363.92	0	0	0	21	2.42	0	0	0	0	0	0.00	
May-20	800	294.36	0	0	0	25	2.88	0	0	0	0	0	0.00	
Jun-20	0	347.23	0	0	0	25	2.88	0	0	0	0	0	0.00	
Jul-20	200	852.07	0	0	0	26	3.00	0	0	0	0	0	0.00	
Aug-20	0	700.25	0	1.20	0	25	2.88	0	0	0	0	0	0.00	
Sep-20	400	579.64	0	5.31	0	26	3.00	0	0	0	0	0	0.00	
Oct-20	0	840.75	0	5.83	0	24	2.76	0	0	0	0	0	0.00	
Nov-20	0	688.20	0	0.80	0	25	2.88	0	0	0	0	0	0.00	
Dec-20	766	685.47	0	0	0	25	2.88	0	0	0	0	0	0.00	
Jan-21	1,800	634.00	0	0	0	25	2.88	0	0	0	0	0	0.00	
Feb-21	6,120	377.72	0	0	0	21	2.42	0	0	0	0	0	0.00	
Mar-21	6,000	325.21	0	0	0	27	3.11	0	0	0	0	0	0.00	
Apr-21	9,700	651.29	0	0	0	22	2.53	0	0	0	0	0	0.00	

May-21	4,000	671.03	0	0	0	24	2.76	0	0	0	0	0	0.00
Jun-21	0	558.72	0	0	0	25	2.88	0	0	0	0	0	0.00
Jul-21	0	382.74	0	0	0	26	3.00	0	0	0	0	0	0.00
Aug-21	3,420	687.05	0	0	0	26	3.00	0	0	0	0	0	0.00
Sep-21	2,400	304.01	0	0	0	25	2.88	0	0	0	0	0	0.00
Oct-21	0	342.38	0	0	0	23	2.65	0	0	0	0	0	0.00
Nov-21	2,000	394.26	0	0	0	26	3.00	0	0	0	0	0	0.00
Dec-21	0	392.44	0	0.67	0	22	2.53	0	0	0	0	0	0.00
Jan-22	0	359.27	0	0	0	23	2.65	0	0	0	0	0	0.00
Feb-22	0	260.57	0	0	0.00	21	2.42	0	0	0	0	0	0.00
Mar-22	0	253.75	0	0	0.00	23	2.65	0	0	0	0	0	0.00
Apr-22	1,240	253.45	0	0	0.00	22	2.53	0	0	0	0	0	0.00
May-22	0	354.94	0	0	0.00	24	2.76	0	0	0	0	0	0.00
Jun-22	0	383.35	1.73	0.08	0.00	25	2.88	0	0	0	0	0	0.00
Jul-22	0	430.89	4.87	1.15	0.00	24	2.76	0	0	0	0	0	0.00
Aug-22	1,000	427.52	0	0	0.00	23	2.65	0	0	0	0	0	0.00
Sep-22	0	476.92	0	0	0.00	21	2.419	0	0	0	0	0	0.000
Oct-22	0	615.87	0	0	0.00	24	2.765	0	0	0	0	0	0.000
Nov-22	0	585.38	0	0	0.00	26	2.995	1	0.020	1	0.035	1	0.020
Total	52,220.00	21,427.71	6.60	15.04	0.000	1093	123.15	1	0.020	1	0.035	2	0.410

Notes:

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

Annex E

Environmental Complaint, Environmental Summons and Persecution Log

Annex E Cumulative Complaint and Summons/Prosecutions Log

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

Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
November 2016	0	0
December 2016	0	0
January 2017	0	0
February 2017	0	0
March 2017	0	0
April 2017	0	0
May 2017	0	0
June 2017	0	0
July 2017	0	0
August 2017	0	0
September 2017	0	0
October 2017	0	0
November 2017	0	0
December 2017	0	0
January 2018	0	0
February 2018	0	0
March 2018	0	0
April 2018	0	0
May 2018	0	0
June 2018	0	0

Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
July 2018	0	0
August 2018	0	0
September 2018	1	0
October 2018	0	0
November 2018	0	0
December 2018	0	0
January 2019	0	0
February 2019	0	0
March 2019	0	0
April 2019	0	0
May 2019	0	0
June 2019	0	0
July 2019	0	0
August 2019	0	0
September 2019	0	0
October 2019	0	0
November 2019	0	0
December 2019	0	0
January 2020	0	0
February 2020	0	0

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

Reporting Month	Number of Complaints in Reporting Month	Number of Summons/Prosecutions in Reporting Month
November 2021	0	0
December 2021	0	0
January 2022	0	0
February 2022	0	0
March 2022	0	0
April 2022	0	0
May 2022	0	0
June 2022	0	0
July 2022	0	0
August 2022	0	0
September 2022	0	0
October 2022	0	0
November 2022	0	0
Overall Total	1	0

Annex F

Investigation Reports

Annex F1

Investigation Reports for October 2022

Investigation Report of CEMS Exceedances

Date	1 – 31 October 2022
Time	Continuous monitoring throughout October 2022
Monitoring Location	Continuous Environmental Monitoring System (CEMS)
Parameter	Various emission parameters of the Cogeneration Units (CHP) and the Ammonia Stripping Plant (ASP)
Exceedance Description	 Continuous monitoring was carried out at the CAPCS, CHP and ASP throughout the reporting period using the CEMS. According to the EM&A Manual, exceedance is considered if the emission concentration of the concerned pollutants is higher than the emission limits stated in Tables 2.2, 2.3 and 2.5 of the EM&A Manual (Version F) for CAPCS, CHP and ASP respectively. The concentration of the concerned air pollutants were monitored on-line by the CEMS. Exceedances of various emission parameters were recorded on the CEMS including: NOx and SO₂ from the CHPs NOx and NH₃ from ASP The Contractor has investigated the cause of the exceedance and identified that The exceedances of SO₂ from the CHPs occurred due to tripping of the de-sulphurisation system resulted from the residue of sulphur accumulated at the exhaust heat exchangers. The exceedances of NO_x from CHPs occurred due to system instability caused by prolonged usage of the CHPs. The exceedance of NOx and NH₃ from ASP occurred due to system instability caused by ASP column and heat exchanger deteriorated condition.
Action Taken / Action to be Taken	The Contractor has arranged cleaning of the heat exchangers of all CHPs to remove potential sulphur residue from the exhaust gas system. The Contractor has also replaced all catalytic convertors with an aim to improve the CO removal efficiency of the system. The Contractor has arranged cleaning of the ASP column and heat exchanger to resume performance.
Remedial Works and Follow-up Actions	The Contractor has arranged a specialist to review the CEMS system performance and accuracy. The specialist will carry out indepth investigation and propose any remediation needed. The Contractor is recommended to closely monitor the processes, including the modification works and follow-up emission monitoring of the ASP to avoid exceedance.

OSCAR Bioenergy Joint Venture EP/SP/61/10 - Organic Resources Recovery Centre Phase 1

The Contractor should review the routine inspection and
maintenance schedule of the ASP and conduct preventative
maintenance to avoid similar re-occurrence of the equipment
failure.

Prepared by: Chris Ng, MT Representative

Date 13 November 2022

Annex F2

Investigation Reports for November 2022

Investigation Report of CEMS Exceedances

Date	1 - 30 November 2022					
Time	Continuous monitoring throughout November 2022					
Monitoring Location	Continuous Environmental Monitoring System (CEMS)					
Parameter	Various emission parameters of the Cogeneration Units (CHP)					
Exceedance Description	 Continuous monitoring was carried out at the CAPCS, CHP and ASP throughout the reporting period using the CEMS. According to the EM&A Manual, exceedance is considered if the emission concentration of the concerned pollutants is higher than the emission limits stated in Tables 2.2, 2.3 and 2.5 of the EM&A Manual (Version F) for CAPCS, CHP and ASP respectively. The concentration of the concerned air pollutants were monitored on-line by the CEMS. Exceedances of various emission parameters were recorded on the CEMS including: NOx, SO₂ and HCl from the CHPs The Contractor has investigated the cause of the exceedance and identified that The exceedances of SO₂ from the CHPs occurred due to tripping of the de-sulphurisation system resulted from the residue of sulphur accumulated at the exhaust heat exchangers. The exceedances of NO_x from CHPs occurred due to system instability caused by prolonged usage of the CHPs. The exceedance of HCl form CHP 2 occurred due to system instability caused by CHP 2 column and heat exchanger deteriorated condition. 					
Action Taken / Action to be Taken	The Contractor has arranged cleaning of the heat exchangers of all CHPs to remove potential sulphur residue from the exhaust gas					
	system. The Contractor has also replaced all catalytic convertors with an aim to improve the CO removal efficiency of the system.					
Remedial Works and Follow-up Actions	The Contractor has arranged a specialist to review the CEMS system performance and accuracy. The specialist will carry out indepth investigation and propose any remediation needed.					

Prepared by: Chris Ng, MT Representative

Date 13 December 2022

Annex G

Odour Patrol Result



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

CERTIFICATE OF ANALYSIS

CLIENT:

OSCAR BIOENERGY JOINT

WORK ORDER:

HK22236298

VENTURE

CONTACT:

MS ANGEL TJIA

ADDRESS:

NO. 5, SHAM FUNG ROAD,

SIU HO WAN, NORTH LANTAU

ISLAND, NT, HONG KONG

LABORATORY:

HONG KONG

SUB-BATCH:

DATE OF PATROL:

09 SEPTEMBER, 2022

DATE OF ISSUE:

SAMPLE TYPE:

21 SEPTEMBER, 2022

ODOUR PATROL

PROJECT:

ODOUR PATROL FOR THE

ORGANIC RESOURCES

RECOVERY CENTRE PHASE 1

IN SIU HO WAN

SITE:

ORGANIC RESOURCES

RECOVERY CENTRE PHASE 1

(O-PARK 1)

NO. OF

LOCATIONS:

8

COMMENTS

Odour Patrol was conducted by the staff of ALS Technichem (HK) Pty Ltd during 10:19 - 10:41 and 15:46 - 16:03.

Sampling information (Project name, Sample ID) is provided by client.

NOTES

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

The results related only to the items tested. All pages of this report have been checked and approved for release.

Richard Fung Managing Director - Hong Kong

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



Work Order: HK2236298

1. Summary of Work

The odour patrol was conducted during daytime and evening time.

2. Odour Patrol

Odour patrolling is a process to make use of the calibrated olfactory senses (i.e. the nasal sense) of the patrol members to evaluate the odour and its intensity during a patrol exercise at the site.

The patrol work was conducted by two odour patrol team members from ALS Technichem (HK) Pty Ltd during each time session. All members are free from any respiratory diseases during patrol day. None of the members has been working or living in the area of the vicinity of the inspection zone.

The patrol team was required to move slowly from one to the other monitoring locations and use their olfactory senses to detect odour at each location.

The location of odour sources and the areas to be affected by the odour nuisance were identified as much as possible.

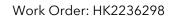
During the patrolling, the meteorological and surrounding information were recorded:

- the prevailing weather condition;
- the wind direction;
- the wind speed;
- location where odour is spotted;
- possible source of odour;
- perceived intensity of the odour;
- duration of odour; and
- characteristics of the odour detected.

The perceived intensity is to be divided into 5 levels which are ranked in an ascending order as follows:

0	Not detected	No odour perceives or an odour so weak that it cannot be easily characterised or described						
1	Slight	Identifiable odour, slight						
2	Moderate	Identifiable odour, moderate						
3	Strong	Identifiable odour, strong						
4	Extreme	Severe odour						

The odour patrol location was shown in Appendix 1.

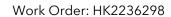




3. Odour Patrol Result:

3.1 Daytime:

tion	Illist	ther		т	RH	ws	D ree)	Odour	Duration of	Direction			
Location	Panellist	Weather	Time	(°C)	(%)	(m/s)	WD (Degree)	Intensity	Odour	from Source	Odour Characteristics	Potential Odour Source	
8	1	Cuppy	10.10	25.4	53.8	0.0		0	NA	NA	NA	NA	
0	2	Sunny	10:19	35.6	55.6	0.0		0	NA	INA	NA	INA	
7	1	C	10.22	245	55.7	0.0		1	Continuous	NIA	Carlaga	Pre-Treatment	
/	2	Sunny	10:22	34.5	55.7	0.0		1	Continuous	us NA	Garbage	Hall	
2	1			10.25	22.7	F/ 0	0.7	101	0	NIA	NIA	NIA	NIA
2	2	Sunny	10:25	33.6	56.9	0.7	121	0	NA	NA	NA	NA	
	1		10.07	22.0	F7 F			0	NIA	NIA	NA	NA	
3	2	Sunny	10:26	33.8	57.5	0.5	132	0	NA	NA			
E	1		10.20	22.4	20.4	0.0		1		NIA	Grassy	Va svatati a s	
5	2	Sunny	10:29	33.4	60.7	0.0		1	Continuous	NA		Vegetation	

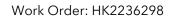




tion	Panellist	ther	-:	т	RH	ws	D ree)	Odour	Duration of	Duration of	Duration of	Duration of	of Direction On-Site Observation							
Location	Pane	Weather	Time	(°C)	(%)	(m/s)	WD (Degree)	Intensity	Odour	from Source	Odour Characteristics	Potential Odour Source								
6	1 Sunny	Sunny 10:32		53.7	1.1	169	1	Continuous	Side wind	Garbage	Pre-Treatment Hall									
		. 5.52	33.3			. 3 /	1													
9	1	6 10.27	10.27	10.27	10.27	10.24	10.24	10:36	10.24	10.27	10.27	33.2	58.1	0.9	201	0	NA	NA	NIA	NA
7	2	Sunny	10.36	33.2	30.1	0.7	301	0	NA	NA	NA	NA								
10	1	Cuppy	10:41	27.3	62.5	0.0		0	NA	NA	NA	NIA								
10	10 2	Sunny	10:41	27.3	02.5	0.0		0	INA	IVA	IVA	NA								

Remark:

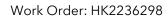
T: Air Temperature;
RH: Relative Humidity;
WS: Wind Speed;
WD: Wind Direction.





3.2 Evening time:

tion	llist	ther		т	DIL (0/)	ws	D ree)	Odour	Duration of	Direction	On-Site Observation	
Location	Panellist	Weather	Time	(°C)	RH (%)	(m/s)	WD (Degree)	Intensity	Odour	from Source	Odour Characteristics	Potential Odour Source
8	1	Sunny	15:46	33.5	51.4	0.9		0	NA	NA		NA
0	2	Sunny	15:40	33.3	51.4	0.9	347	0	INA	NA	NA	IVA
7	1	Sunny	15:48	33.6	51.5	0.5	107	1	Continuous	Side wind	Garbage	Pre-Treatment Hall
/	2	Sunny	15:46	33.0	51.5	0.5	107	1	Continuous			
2	1	C	15.51	22.5	22.5	0.0		1	Continuous	NA	Biogas	Biogas Tank Valve Holder
2	2	Sunny	15:51	33.5	53.6	0.0		1	Continuous			
3	1		15.50	20.6	57.1			0	NA		NA	NA
3	2	Sunny	15:52	32.8	57.1	0.0		0	INA I	NA		
Г	1	C	15.55	22.0	F/ 0	0.0		1	Cartiana	NIA	C	V
5	2	Sunny	15:55	33.9	56.8	0.0		1	Continuous	NA	Grassy	Vegetation

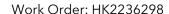




tion	ellist	ther	-:	т	RH	ws	D ree)	Odour	Duration of	uration of Direction		ite Observation	
Location	Panellist	Weather	Time	(°C)	(%)	(m/s)	WD (Degree)	Intensity	Odour	from Source	Odour Characteristics	Potential Odour Source	
6	6 Sunny 2	15:58	33.8	56.5	0.6	318	0	NA	NA	NA	NA		
		13.30	33.0			310	0						
9	1	Cuppy	14.00	4 00 00 4 55	4 55.8	5.8 0.8	305	0	NA	NA	NA	NA	
7	2	Sunny	Sunny 16:00	32.4				0					
10	10 1 Sunny			0			NA						
10		Sunny	16:03	29.6	57.3	-	-	0	NA	NA	NA	NA	

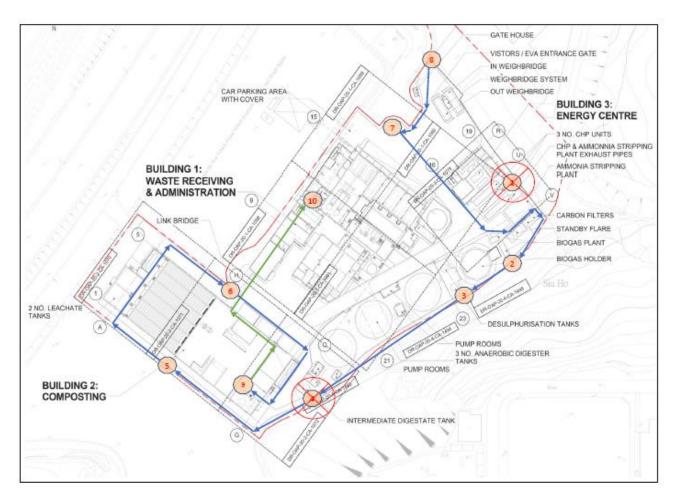
Remark:

T: Air Temperature;
RH: Relative Humidity;
WS: Wind Speed;
WD: Wind Direction.



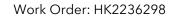


Odour Patrol Route





Checkpoint





A2.1 Odour Patrol at Different Locations - Daytime (First round)



Location: 2



Location: 7







Location: 5

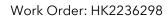


Location: 9





Location: 10





A2.2 Odour Patrol at Different Locations - Evening time



Location: 2



Location: 7



Location: 3



Location: 8



Location: 5



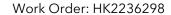
Location: 9



Location: 6



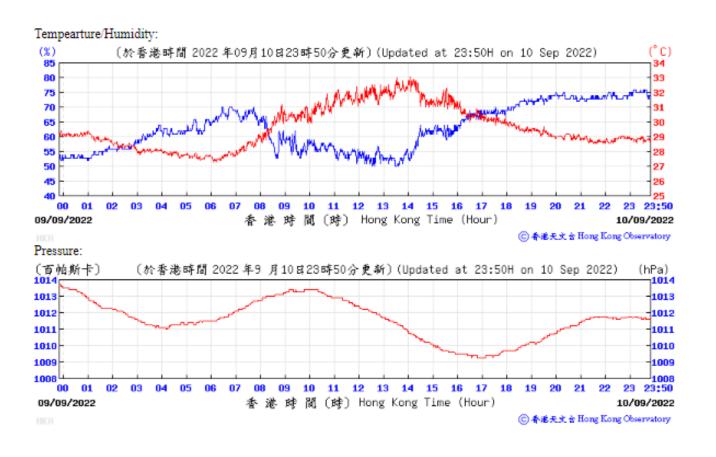
Location: 10

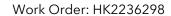




APPENDIX 3

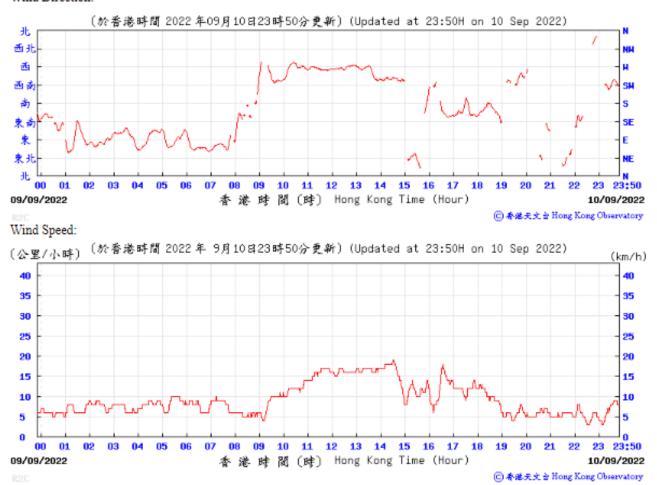
Extract of Meteorological Observations from Hong Kong Airport Observatory Station







Wind Direction:





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

CERTIFICATE OF ANALYSIS

CLIENT:

OSCAR BIOENERGY JOINT

WORK ORDER:

LABORATORY:

HK2237519

VENTURE

CONTACT: MS ANGEL TJIA

ADDRESS:

NO. 5, SHAM FUNG ROAD,

ISLAND, NT, HONG KONG

SIU HO WAN, NORTH LANTAU

SUB-BATCH:

HONG KONG

DATE OF PATROL:

22 SEPTEMBER 2022

DATE OF ISSUE:

SAMPLE TYPE:

3 OCTOBER 2022 ODOUR PATROL

PROJECT:

AD HOC ODOUR PATROL FOR

THE ORGANIC RESOURCES **RECOVERY CENTRE PHASE 1 IN**

SIU HO WAN

SITE:

ORGANIC RESOURCES

RECOVERY CENTRE PHASE 1 (O-

NO. OF

8

PARK 1)

LOCATIONS:

COMMENTS

This was an ad hoc odour patrol event requested by the client and conducted by ALS Technichem staff during 10:33 - 10:57 on 22nd September 2022.

Sampling information (Project name, Sample ID) is provided by client.

NOTES

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

The results related only to the items tested. All pages of this report have been checked and approved for release.

Managing Director

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



Work Order: HK2237519

1. Summary of Work

This ad hoc odour patrol was conducted at eight (8) selected locations as requested by the client.

2. Odour Patrol

Odour patrolling is a process to make use of the calibrated olfactory senses (i.e. the nasal sense) of the patrol members to evaluate the odour and its intensity during a patrol exercise at the site.

The patrol work was conducted by two odour patrol team members from ALS Technichem (HK) Pty Ltd during each time session. All members are free from any respiratory diseases during patrol day. None of the members has been working or living in the area of the vicinity of the inspection zone.

The patrol team was required to move slowly from one to the other monitoring locations and use their olfactory senses to detect odour at each location.

The location of odour sources and the areas to be affected by the odour nuisance were identified as much as possible.

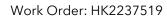
During the patrolling, the meteorological and surrounding information were recorded:

- the prevailing weather condition;
- the wind direction;
- the wind speed;
- location where odour is spotted;
- possible source of odour;
- perceived intensity of the odour;
- duration of odour; and
- characteristics of the odour detected.

The perceived intensity is to be divided into 5 levels which are ranked in an ascending order as follows:

0	Not detected	No odour perceives or an odour so weak that it cannot be easily characterised or described					
1	Slight	Identifiable odour, slight					
2	Moderate	Identifiable odour, moderate					
3	Strong	Identifiable odour, strong					
4	Extreme	Severe odour					

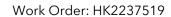
The odour patrol location was shown in Appendix 1.





3. Odour Patrol Result:

tion	Illist	ther	-:	т	RH	ws	D ree)	Odour	Duration of	Direction from Source	On-Site Observation	
Location	Panellist	Weather	Time	(°C)	(%)	(m/s)	WD (Degree)	Intensity	Odour		Odour Characteristics	Potential Odour Source
8	1	Sunny	10:33	30.4	72.0	3.2	176	1	Intermittent	Side wind	Garbage	Pre-treatment Hall
0	2							1				
7	1	Cuppy	nny 10:35	35 30.2	73.9	0.9	245	0	NA	NA	NA	NA
/	2	Sunny						0				
2	1	C	10:39	31.8	76.8	0.0		0	NA	NA	NA	NA
2	2	Sunny						0				
3	1 2	Sunny 10:4	10.40	21 E	74.4	0.8	003	1	Intermittent	Side wind	Biogas	Biogas Tank Valve Holder
3			10.40	31.5				1				
5	1	Sunny	10:45	31.1	82.1	0.4	242	1	- Intermittent	Side wind	Grassy	Nearby Vegetation
3	2							1				

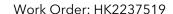




tion	Panellist	Weather	Time	T (°C)	RH (%)	WS (m/s)	WD (Degree)	Odour Intensity	Duration of Odour	Direction from Source	On-Site Observation	
Location											Odour Characteristics	Potential Odour Source
6	1 Sunny	Sunny	10:48 31.0	31.0	77.4	1.4	154	1	Intermittent	Side wind	Garbage	Pre-treatment Hall
	2	Garmy						1				
9	1	Sunny	10:54	30.0	84.8	1.4	115	0	NA	NA	NA	NA
7	2							0				
10	1	Cuppy	10:57	25.2	79.7	NA	NA	1	Continuous	NA	Musty	Air conditioner
10	2	Sunny	10.57	23.2	17.1	IVA		1				

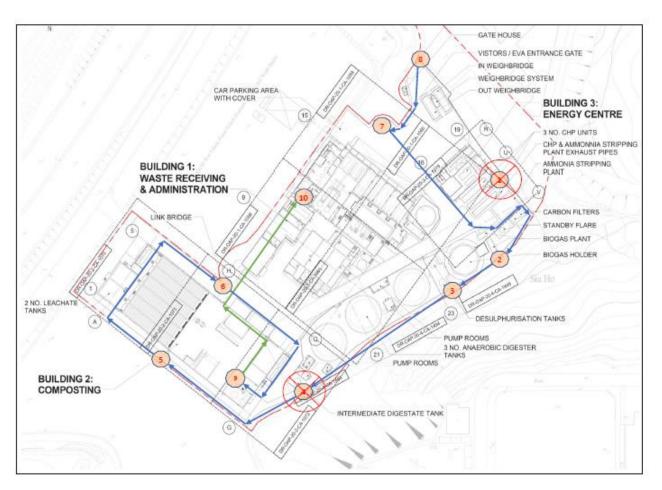
Remark:

T: Air Temperature;
RH: Relative Humidity;
WS: Wind Speed;
WD: Wind Direction.



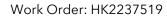


Odour Patrol Route











Odour Patrol Locations Photos



Location: 2



Location: 7



Location: 3





Location: 5



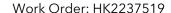
Location: 9



Location: 6

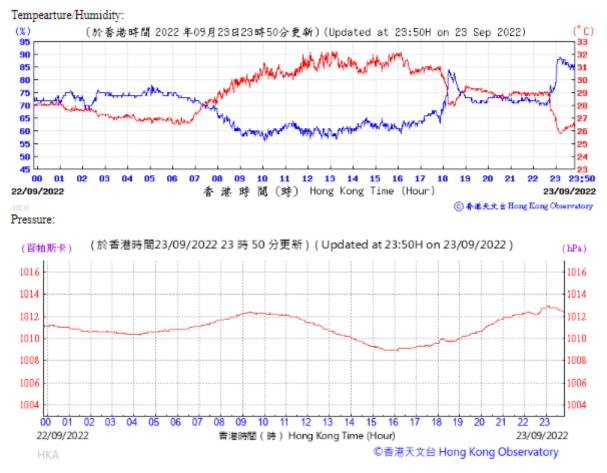


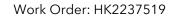
Location: 10





Extract of Meteorological Observations from Hong Kong Airport Observatory Station







Wind Direction:

