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Response-to-Comments table addressing comments from the Environmental Protection Department

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RENEWAL OF PLANNING APPROVAL FOR TEMPORARY ASPHALT PLANT FOR A PERIOD OF 5 YEARS AT TSING YI TOWN LOT NO. 108 RP (PART), SAI TSO WAN ROAD, TSING YI (SECTION 16 PLANNING APPLICATION NO. A/TY/148)

3rd Further Information (R-C table)

Comments	Response(s)
-	The EA Report serves as a reference material in relation to the assessment conducted for the Specified Process (SP) Licence application. The SP Licence (Licence number: L-15-042(1)) has been granted to the Plant with an effective period of 3 years commencing from 13 March 2024. As the actual annual production capacity of the Plant will be reduced from 1,000,000 tonnes (as in previous S16 application) to 500,000 tonnes (current), the annual emission from the Plant operation based on the current Plant setting is expected to be no worse than that in the previous S16 application. Please be clarified that there was a typo in the applicant's name in the EA report. The applicant's name shall be "Hongkong United Dockyards Limited".
Environmental Protection Department (EPD) received on 29 May 2024	
Waste Management Table 5.1 General Refuse 1. Please explain the calculation of 40kg/day and why 2kg/person/day of general refuse generated by workforce is adopted.	1. The estimated amount of general refuse has been recalculated, with reference to the general refuse generation rate of 0.65kg/person/day as adopted in previous approved EIA reports. The estimated amount of general refuse is 9kg/day only, for an average workforce of 14.

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2. Please provide details about recycling arrangements.	2. Segregation of recyclable materials (i.e. paper, plastic bottles, aluminium cans and glass bottles) for recycling will be considered. Such recycled waste practice will depend on if recycled waste collector can be arranged to collect the waste.
Chemical Waste: 3. Please list any additional examples of anticipated chemical wastes, if applicable.	3. Besides lubricant oil, anticipated chemical wastes also include spent diesel, distilled bitumen, spent oil filter and oily solid waste. The amount of these chemical waste altogether is expected to be less than <5L/day. The estimated amount is unchanged.
Solid Waste 4. Please clarify the expected amount of solid waste (rejected asphalt concrete / conditioned dust paste) that will (1) be recycled for production use and (2) be delivered to public fill reception facilities, respectively.	4. The amount of solid waste (i.e. rejected asphalt concrete/conditioned dust) are expected: - 100% to be recycled for production use; and - 0% to be delivered to public fill reception facilities. The exact quantity of rejected asphalt concrete that will be recycled for production use cannot be predicted, as the rejected asphalt concrete will only occur if there is a faulty production. However, the rejected asphalt will be recycled and reintroduced into the production process entirely. After reviewing the storage capacity of the Plant, the Plant has sufficient storage capacity to reserve the recovered dust for re-using in the production process. Disposal in the form of conditioned dust paste is considered not necessary.
5. Please estimate the number of trucks required for transporting waste to different disposal outlets per day. 6. Please review whether it is appropriate to incorporate the recommendations below. "All dump trucks engaged on-site for delivery of inert and non-inert C&D material from the site	5. The estimated average number of truck trips required for transporting waste to various disposal outlets is approximately 1 trip per week only. 6. The recommendations on the installation of GPS on dump trucks are applicable to trucks of the Plant for transporting solid waste and sludge (if any) during the Plant operation.

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to the designated disposal location, including PFRFs, landfill etc., should be equipped with GPS or equivalent system for tracking and monitoring of their travel routings and parking locations by the Contractor to prohibit illegal dumping and landfilling of materials; and "The data collected by GPS or equivalent system should be recorded properly for checking and analysis the travel routing and parking locations of dump truck engaged on site."	
7. Please supplement the recommended practices and mitigation measures based on the waste management hierarchy principles for each type of waste identified. Recommendations of good site practices, waste reduction measures as well as the waste handling, transportation, storage and collection should be included.	7. The waste management practices and mitigation measures based on the waste management hierarchy principles that will be implemented during the Plant operation are supplemented below: **Good Site Practices** Adverse waste management implications are not expected, provided that good site practices are strictly implemented. The following good site practices will be implemented: - Nomination of an approved personnel, such as a Plant in-charge, to be responsible for the implementation of good site practices, arrangements for collection and effective disposal to an appropriate facility, of all wastes generated at the site; - Training of site personnel in site cleanliness, appropriate waste management procedures, and concepts of waste reduction, reuse and recycling; - 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 by either covering trucks or by transporting wastes in enclosed containers; - Separation of chemical wastes for special handling and appropriate treatment at the CWTF; and

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	- Provision of a recording system for the amount of wastes generated, recycled and disposed of and the disposal sites. **Waste Reduction Measures** Good management and control can prevent the generation of significant amount of waste. Waste reduction is best achieved at the planning and design stage, as well as by ensuring the implementation of good site practices. Waste reduction measures include: - Encourage collection of aluminum cans and waste paper with separate labelled bins provided to segregate these wastes from other general refuse by the workforce; and - Any unused chemicals, and those with remaining functional capacity, be recycled as far as possible. **Waste Management Practice** - General refuse generated on-site will be stored in enclosed bins separately from chemical waste and collected by the waste collector on a regular basis, to reduce odour, pest and litter impacts. - The Plant has been registered as a Chemical Waste Producer with EPD. Chemical waste generated during the operation of the Plant will be properly stored and handled in accordance with EPD's Code of Practice on the Packaging, Labelling and Storage of Chemical Waste for subsequent collection and disposal by a licensed chemical waste collector. - The Plant operator will ensure that all waste generated will be transported to proper disposal outlets for disposal on a regular basis.
Land Contamination 8. It is noted that the plant is scheduled to operate in 2024. Please advise if the plant is currently operational. 9. Please provide the recent records from Government Authorities for our reference (e.g.,	8. The Plant currently is not in operation stage. Construction of the Plant has been substantially completed, and it is awaiting the commercial operation. Only trial commissioning has been conducted in the meantime. 9. In view of the current status that the Plant is not in operation, the records in concern are considered not necessary.

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(i) Dangerous Goods Storage, (ii) Registration of Chemical Waste Producers, (iii) Spillage/Leakage of Chemical or Dangerous Goods, and (iv) Fire incidents, etc.)	
EPD **received on 14 June 2024**	
1. Please specify if there are water sensitive receivers nearby. If there are special clearance requirements required, please specify.	1. The several small and ephemeral streams that flow down from the hillside of Liu To Shan are considered as the water sensitive receivers. However, these streams are at a higher elevation that the ground level of the Plant, such that wate quality impacts from the operation of the Plant are unlikely. Nullahs/drains are present outside the Plant but at the opposite side of the road. Additionally, considering that the potentially silty raw materials (e.g. aggregates and fillers) are stored in enclosed installations, and there is a vehicle washing facility to remove silty material on trucks (if any) before leaving the Plant, it is unlikely that any silty materials from the Plant can fall into these nullahs/drains. Construction of the Plant has been substantially completed, and it is awaiting the commercial operation. In addition, no special clearance requirements are required.
2. Please describe precautionary measures when unloading from hopper to the site to prevent debris from discharging into nearby waters.	2. Precautionary measures include: - The raw materials (aggregates) will be unloaded from hopper/barge through the use of enclosed conveyor belt. - The hopper/barge has the compartments fully covered.
3. Table 4-1, sewage generated by workforce - Please confirm with SIG that sewerage connection is not possible.	3. The Plant is at the early stage of considering the use wastewater treatment facility with MBR process only. At the operation stage, the Plant will opt for using portable toilets. The domestic wastewater will thus be temporarily stored and will be regularly collected by licenced collector for disposal.

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4. Table 4-1, sewage generated by workforce - Please provide more details about the MBR plant. In particular, please illustrate in a diagram the location of the plant, the discharge point, maintenance details including failure contingencies, discharge standard that will be met, the water quality objective of receiver waterbody, loading capacity.	4. The Plant is at the early stage of considering the use wastewater treatment facility with MBR process only. At the operation stage, the Plant will opt for using portable toilets. The domestic wastewater will thus be temporarily stored and will be regularly collected by licenced collector for disposal.