



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: eiaocomment@epd.gov.hk)

21 October 2022

Dear Sir,

**Environmental Impact Assessment Report for
Upgrading of Tai Po Sewage Treatment Works (TPSTW)**

Green Power would like to draw your attention to our concerns about the above-captioned project (the Project).

1. Green Power supports the Project to provide effluent reuse and co-digestion facilities for sewage sludge and organic/pre-treated food waste to promote water conservation and waste reduction respectively.
2. Regarding reducing the carbon footprint, we appreciate that renewable energy is planned to be utilized for the Project, and surplus biogas and electricity produced is considered to supply to The Hong Kong and China Gas Company Limited (Towngas) and CLP Power Hong Kong Limited (CLP Power).

Air Quality

3. As mentioned in Sec 3.5.1.3 of EIA Report, the 10th highest 8-hour ozone levels recorded at Tai Po Air Quality Monitoring Station ranged from 197 to 147 $\mu\text{g}/\text{m}^3$ that breach the Air Quality Objective of 160 $\mu\text{g}/\text{m}^3$ since 2017. As sources of ozone and corresponding mitigation measures were not identified in the Report, its level is anticipated to exceed AQO in the construction and operation phase of the Project.
4. Ozone is a product of photochemical reactions of NO_x and volatile organic compounds (VOCs) in the atmosphere instead of being emitted directly from human activities. While both NO_x and VOCs will be generated during operation phase of the Project, proactive measures should be in place instead of depending on the uncertain scavenging effect (i.e. degeneration of ozone in the presence of NO_x, a common roadside pollutant.)
5. Measures to prevent emission of VOCs in the transfer and treatment processes of sludge digestion and co-digestion of food waste should be devised and implemented. Biogas should be efficiently combusted or consumed to eliminate or minimize the emission of VOCs.

6. In the operation phase, transportation route of trucks loading with sludge should strictly follow a designated route and be well air-tight and leachate-tight contained in delivery trucks to avoid odour nuisance to the public and residence along the transportation route.

Water Quality

7. Surface runoff generated from the site during construction phase should be prevented from discharging into stormwater drainage and Tolo Harbour directly because the turnover rate of seawater of engulfed Tolo Harbour is low and unfavourable for dispersal and dilution of pollutants in stormwater. Sand/silt removal facilities such as sand traps, silt traps and sedimentation basins in construction sites should be properly designed and installed with proven efficiency to remove the pollutants.
8. Channels, especially perimeter channels, or earth bunds or sandbag barriers provided on site to direct stormwater to such silt removal facilities should be checked regularly for any damages or leakage, especially before heavy rain events predicted by the Hong Kong Observatory. The outfalls effluent of stormwater drains leading to the construction site or its vicinity should also be monitored after heavy rains to ensure the performance of these installations.
9. The water quality of the effluent of TPSTW conveyed to Kai Tak River through the pipelines of the Tolo Harbour Effluent Export Scheme (THEES) during construction and operation phase should be monitored to avoid adverse impacts on revitalised Kai Tak River. Contingency plan should be devised in case of accidental discharge of untreated effluent from the Project site to Kai Tak River that may threaten the fish and birds inhabited.

Waste Disposal

10. As mentioned in Section 10.5.2, approximately 338,770 m³ of inert C&D materials would be generated of which 50,810 m³ would be reused on-site and 287,960 m³ would be disposed of at designated Public Fill Reception Facility. Approximately 25,850 m³ of non-inert C&D materials would be generated of which 18,090 m³ would be recycled and 7,760 m³ would be disposed of at designated landfill. Therefore, totally 287,790 m³ of C&D materials would be transported out of the project site during construction phase that constitutes a major environmental concern.
11. As mentioned in Section 10.5.12, approximately 26,200 m³ of excavated sediments would be generated during construction phase which would be disposed of by dumping at sea. Beside their land transportation issues mentioned below, the requirements of the ETWB TCW No. 34/2002 should be strictly followed, and the navigation routes of barges involved in the sediment disposal should be effectively monitored. Disposal at sea other than the designed sites should be prevented with effective measures.
12. Despite claims of trip-ticket system being effective in avoiding illegal dumping and landfilling of C&D materials or dredged sediment at unauthorized sites, cheating of the system is possible. Stringent documentation, verification and monitoring for the waste disposal system must be implemented to avoid landfilling in rural areas by waste generated by the Project, especially SSSI in Ting Kok, wetlands in Tung Tsz, farmlands in Lam Tsuen and other rural areas in Tai Po and along the transportation routes.

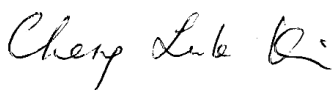
13. As most of the areas near to the project site are vehicular accessible countryside places, wetlands, farmlands and seashores, any fly-tipping of such solid wastes generated from this project will be hard to combat. Even if such incidents are spotted, reinstatement can seldom be implemented because of various reasons such as land ownership, landuse zoning and etc.
14. Effective and deterring measures to confine the travelling routes of dump trucks and similar machineries related to the Project should be utilized, e.g. real-time GPS devices on the trucks, instantaneous alarm alert for the trucks deviated from the designated routes, should be seriously considered. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the irregular activities of relevant contractors.

Ecology

15. Monitoring of birds should be properly conducted during the construction phase to minimize the disturbance to them, especially the vulnerable Collared Crow. Disturbing and noisy construction procedures of the proposed project and human disturbance should be restricted. The construction site should be well masked if necessary. Measures to avoid human disturbance, including noise and glare, should be devised, effectively implemented and monitored during operation phase.
16. Tree felling and transplantation should be avoided as far as possible. Preserved trees in the construction site should be well protected during construction phase by proper fencing against interference and damages, such as trampling by human or machines, wastewater or chemical discard or unnecessary trimming and root excavation. Native tree/shrub species are preferred as far as possible for greening, ecological compensation or enhancement. Translocation of trees, if unavoidably, in the Project site should be implemented when the available destination sites are identified. The practice should be managed under the advice and supervision of registered experienced arborists.
17. Greening should be incorporated in the Project site for the aims of alleviating heat island effect and enhancing conservation values.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 3961 0200, F: 2314 2661, Email: lkcheng@greenpower.org.hk).

Yours faithfully,



CHENG Luk-ki
Director, Green Power