

**ERA review of Comparison of the processes at Facility with the BREF for Large Volume Organic Chemical Industry (published February 2003) for Poligas Ltd.**

<b>Aspect of BREF</b>	<b>ERA Feedback 12.07.2017.</b>	<b>ERA Feedback 25.08.2017.</b>	<b>Operator feedback 03.10.2017.</b>	<b>ERA Feedback 16.11.2017.</b>
<b>Part 1: Management systems</b>				
Policy	Kindly clarify whether certification for ISO 14001 (2015) will be available by end of September 2017. Kindly note that as part of the Improvement Programme ERA will be requesting submission of the updated policy and procedures showing that the aspects highlighted in the BREF are being complied with.	Noted. Kindly submit to ERA once it's available.	Yes we anticipate that by end September 2017 we will be formally granted ISO 14001(2015) status. Updated policy and procedures will be submitted accordingly.	Kindly submit the updated policy and procedures and the new ISO certificate.
Process design	Kindly provide feedback on each point related to this aspect as may be applicable to your operations.	With regards to containment of spillages of raw materials and products, kindly refer to the previously submitted emergency response plan.		Reply provided to part 2 "Prevention and control of fugitive emissions" is being regarded having addressed also this section.
Process Operation	1. Kindly provide more details on the hardware control system implemented on site. 2. Kindly provide a copy of the SOP utilized for training of plant personnel in relation of environmental issues. 3. Kindly provide the latest version of the emergency response SOP. 4. Kindly provide a reply to points	Noted		

	4-7 of this aspect.			
<b>Part 2: Pollution prevention and minimisation</b>				
Introduction	Kindly provide feedback on this point.	Noted		
Design of new LVOC processes	Kindly provide further details on how each point of this aspect is implemented.			
Prevention and control of fugitive emissions	Kindly provide feedback on this aspect.	<p>With regards to leak detection systems kindly note that a preventive leak detection system is to be implemented. E.g. visible/audible alarms/gauges.</p> <p>Routine maintenance/inspection to all pipework is to be carried out on a regular basis prior to detection of any leaks by olfactory means. Also kindly ensure that all replies are included in the “status at installation” column.</p>	<p>Because of the peculiar smell of acetylene, leak detection is at once noticed by sense of smell. Apart from this, each stage of the production process is equipped with line pressure gauges. This means that should pressure at entry point read 1 BAR and at line exit pressure reads 0.5 bar, then this pressure drop is indicative of a leakage. Moreover, a visual routine inspection is carried out prior to production.</p>	Noted.
Storage, handling and transfer	Kindly note that although some of the techniques indicated may not be applicable to the operations on site, feedback is required on how any of these techniques (or any others) are	Noted.		

	implemented.			
Emissions of water pollutants	Kindly provide feedback as may be relevant.	Noted.		
Groundwater pollution	Noted	-		
Generation of residues	Kindly specify how these aspects are reached.	Noted.		
Energy efficiency	Noted	-		
Noise and vibration	Kindly provide feedback on this aspect indicating that the processes are carried out within enclosed areas and how compliance with conditions 2.2.9.1. of the IPPC Permit are being adhered to.	Noted.		
<b>Part 3: Air pollution control</b>				
Flaring	Kindly provide the following details: a) how the volume of purged gas is calculated b) detailed description as to why this process is carried out c) contents of the purged gas and location of emission d) evidence that such line purging does not pose any fire and explosion hazards	Noted.		
Process furnaces	Kindly indicate that this section is not applicable.	Noted.		
Combustion units	Noted	-		
Carbon dioxide emissions	Kindly indicate that this section is not applicable.	Noted.		
<b>Part 4: Water pollutant control</b>				
Organic waste water streams	Noted	-		
Emissions levels for waster emissions	Kindly indicate that this section is not applicable.	Noted.		
<b>Part 5: Wastes</b>	Section noted	-		

<b>and residues control</b>				
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