

Variation to IPPC permit application for AGV Non Ferrous Malta Ltd.

As per ERA requirements

Additional Documentation

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CLIENT REF. NO: IP 0004/13/A

FIRST VERSION

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AMENDMENT RECORD

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1.0 Replies to ERA Comments

Comments regarding the Variation of the IPPC Permit for AGV Non Ferrous Ltd.

Form A

Section	Duly made?	ERA Comments – January 2019	Comments by AGV Non Ferrous Ltd.	ERA Comments – March 2019	Comments by AGV Non Ferrous Ltd.	ERA Comments – September 2019	Comments by AGV Non Ferrous Ltd.
A1.1	✓	Noted.					
A1.2	✓	Noted.					
A1.3	✓	Noted					
A1.4	x	<p>Kindly note that WM00002/14 (18/12/2014) is expired.</p> <p>Furthermore, as indicated in ERA's past inspection reports for year 2018, Operator is being requested to work on the following pending Improvement Programme Items in Table 1.5.1 of IPPC Permit A and to implement Improvement Programme Items 1, 2 & 3 since their deadline has expired:</p>	Noted. Reference to WM00002/14 has been removed from Form A and Appendix II.	Noted.			

		<p>1. Installation of low rim/lip bund at the main doors into the warehouses in accordance with Condition 2.2.6.7 of this permit.</p>	<p>1. A low rim, that extends for the entire width of the main entrance, has already been installed as shown in the photograph below.</p> 	<p>Applicant is to provide engineer's certification indicating that the capacity of each bund shall be a minimum of 110% of the largest container within the bund or 25% of the total capacity of all the containers within the bund, whichever is the greater is required for this garage. This shall consider the properties of materials handled on site including any associated emergency scenarios such as fires and spills.</p>	<p>The applicant is in the process of commissioning a warranted engineer to carry out a survey and issue the relevant certificate.</p> <p>Kindly include in the improvement programme.</p>	<p>Kindly note that this will be required prior to the determination of the permit. Applicant is to provide timeframe for submission.</p>	<p>The Applicant has acquired an engineer's certificate for the integrity of the main lip bund. A copy of which is attached to this application. The full bunding certificate will be provided by the 15th November, 2019.</p> <p>The full bunding certificate is included in the document 'Additional Information' as part of the consolidated application.</p>
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		<p>2. Provision of details (including 24hr contact number and CV) of delegate for the Technically Competent Person in accordance with Condition 2.3.13</p>	<p>2. Competent Person Contact Details Mr Frank Cachia Mobile: 99846461</p> <p>The CV of Mr. Frank Cachia is provided in a separate document with this application.</p> <p>Refer to the document 'Additional Information' included as part of the consolidated application.</p>	<p>A CV for a delegate for the TCP is also to be provided.</p>	<p>The TCP is Mr Frank Cachia (CV already provided). Mr Cachia has applied for a course at MCAST called <i>MG2I-C0429 Waste Collection and Transportation of Waste (NEW)</i>. The course will commence once there are enough applicants to make the course feasible. The email correspondence between Mr Cachia, MCAST and ERA (Dorianne Galea) is included as a separate document with this application.</p> <p>The email correspondence is provided in 'Additional Information' included as part of the consolidated application.</p>	<p>The Improvement Programme item calls for the designation of a <u>delegate</u> for the TCP. This is to be immediately chosen and a CV for the chosen person is to be provided to the Authority.</p>	<p>The designated delegate for TCP is Mr. Idriss Diankou. A copy of his CV is attached to this application.</p> <p>Refer to the document 'Additional Information' included as part of the consolidated application.</p>
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		3. Submission of an Outline Decommissioning Plan, in accordance with Condition 2.9.2	3. A Decommissioning Plan is provided in a separate document within this application. Refer to the document 'Additional Information' included as part of the consolidated application.	Noted.		With regards to the Improvement Programme No 3 and feedback from the Compliance and Enforcement Directorate within ERA, applicant is to provide information as to what training the TCP has undergone. Kindly note that MCAST course mentioned above is not being deemed sufficient to satisfy the requirement of the IP item. If no further courses have been carried out, applicant is to immediately identify a training of his choice and provide proof of enrolment for such training.	The TCP is in the process of arranging with Transport Malta to attend the Dangerous Goods Driver Training Course (Course Type A) as advised by ERA Compliance and Enforcement Team. All relevant email correspondence with Transport Malta and ERA is included as part of this application. Refer to the document 'Additional Information' included as part of the consolidated application.
A2.1	✓	Noted.					
A2.2	✓	Noted.					
A3.1	✓	Noted.					
A3.5	✓	Noted.					

Form C

Section	Duly Made ?	ERA Comments – January 2019	Comments by AGV Non Ferrous Ltd.	ERA Comments – June 2019	Comments by AGV Non Ferrous Ltd.	ERA Comments – September 2019	Comments by AGV Non Ferrous Ltd.
C1.1	✓	Noted.					
C1.2	✓	Noted. Kindly correct reference to the name of the facility in the last section.	Noted and amended.	Kindly note that this has not yet been amended.	Noted and amended.	Noted.	
C1.3	✓	Noted.					
C1.4	✓	Noted.					
C2.1	✓	Noted.					
C2.2.1	x	<p>Kindly add * at the end of the EWC code 16 02 11 in table 1.</p> <p>With reference to the ERA Inspection Reports of 2018 during which several separated WEEE components were noted, applicant is to describe the whole AC dismantling process resulting in the various components. This includes but is not limited to AC</p>	<p>Noted and amended.</p> <p>The treatment of WEEE is limited to the removal of the plastic casings from the AC units.</p>	<p>Noted.</p> <p>No information on how AC units shall be checked for leaks, and handled in such a way to ensure that handling does not result in leaks of any ozone depleting substances and fluorinated greenhouse gases to leak into the surrounding</p>	<p>All of the AC units accepted on site are already degassed. It is the applicant's responsibility to check/confirm that such activities were carried out before bringing the AC units to the AGV facility. Therefore, leaks from the AC units will not occur.</p>	<p>The information which is being provided is not in accordance to the activities being performed on site. During an inspection by the Compliance and Enforcement Directorate on the 24th of July 2019, as per the photos in Annex 1 below, it was noted that WEEE treatment is not limited to removal of plastic</p>	<p>The processing of WEE is limited to the removal of plastic casings. Therefore, there is no need to update the current application.</p> <p>The operator only accepts AC units which have been degassed prior to arriving on site. Initially the operator asks for the certificate of degassing</p>

		<p>radiators, copper coils and electric motors etc. in accordance with the obligations of S.L. 549.89. Information on how any ozone depleting substances and fluorinated greenhouse gases containers within the AC units shall be checked for leaks, and handled in such a way to ensure that handling does not result in leaks to the surrounding environment is to be provided.</p> <p>Should the WEEE treatment be limited to the removal of the plastic casing only, relevant conditions will be included in the IPPC Permit.</p>		<p>environment has been provided.</p> <p>Furthermore, applicant is to provide information on which facility is accepting the WEEE part of the AC locally. Applicant is reminded that the removal of the WEEE from site is to be done via the consignment note procedure as this is a hazardous waste.</p>	<p>The WEEE from the AC units is taken to Metalco (IP 0002/13/A).</p> <p>Confirmed that the removal of WEEE will follow the consignment note procedure.</p>	<p>treatment. If applicant intends to continue such activities, an updated application is to be provided. Alternatively applicant is to submit pre-acceptance procedures in accordance with BAT No. 2 showing how it shall be ensured that all AC units accepted on site are already degassed and that leaks from the AC units will not occur.</p> <p>Noted.</p>	<p>from the supplier. When this is not made available, the operator carries out a visual inspection of the gas tank and its valves to confirm that it has been fully degassed.</p>
C2.2.2	✓	Noted.					
C2.2.3	✓	Noted.					

C2.2.4	x	Kindly submit a Best Available Techniques (BAT) comparison for the BAT conclusions stipulated under COMMISSION IMPLEMENTING DECISION (EU) 2018/1147 of 10 August 2018 establishing BAT conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council. This shall cover all current and proposed activities on site.	The BAT comparison document is included in the Form C report in Appendix 1.	<p>BAT1: A copy of the EMS is to be provided.</p> <p>BAT2: Operator is to submit a proposal on how all incoming, stored, treated and outgoing waste streams shall be tracked including details of waste producer, EWC code, date and any associated risk. Such a system is intended to be: risk-based (e.g. distinguishing between hazardous and non-hazardous waste), consistent with the various designated waste storage areas, facilitate on-site</p>	<p>BAT 1: A copy of the EMS has been submitted as separate document with this application. Refer to the document 'Additional Information' included as part of the consolidated application.</p> <p>BAT 2: The BAT document has been updated. The applicant uses a form which includes the date, item, weight, details of the delivering contractor and details of the receiving recycler. An example of the form is provided at the end of BAT comparison document.</p>	<p>Noted.</p> <p>ERA notes that the form which has been provided is an invoice form and not a tracking and inventory system as requested by BAT2(c). Previous comment refers.</p>	<p>A tracking and inventory template has been included as part of this application.</p> <p>Refer to the document 'Additional Information' included as part of the consolidated application.</p>
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				<p>waste identification and reporting.</p> <p>BAT21(b): With reference to CPD's feedback kindly provide information on how any used firefighting water shall be contained in order to prevent contamination to the surrounding environment.</p>	<p>Firefighting equipment is mainly restricted to foam fire extinguishers due to the nature of the materials present onsite. Only in extreme cases will water be used for firefighting purposes. In such rare cases the water will be contained within the bunded garages, which can withhold a maximum of 3,960m³. The waste water would then be collected into a bowser and disposed of as a hazardous waste stream.</p> <p>The BAT comparison document has been updated accordingly.</p>	<p>Applicant is include the "fire plan" referred to in the response to CPDs feedback explain ing how any water used for firefighting shall not pass into the shower drain in the garage.</p>	<p>A copy of the fire plan is included in this version of the application.</p> <p>Refer to the document 'Additional Information' included as part of the consolidated application.</p> <p>The fire tray has a height of 30cm above the floor. Therefore, no firefighting water will pass into the shower drains.</p>
C2.2.5	✓	Noted.					
C2.3	✓	Noted.					
C2.4	✓	Noted.					
C2.5	✓	Noted. In view that Section 2.0 of the Main Application	Baling is not carried out on site. Any baled				

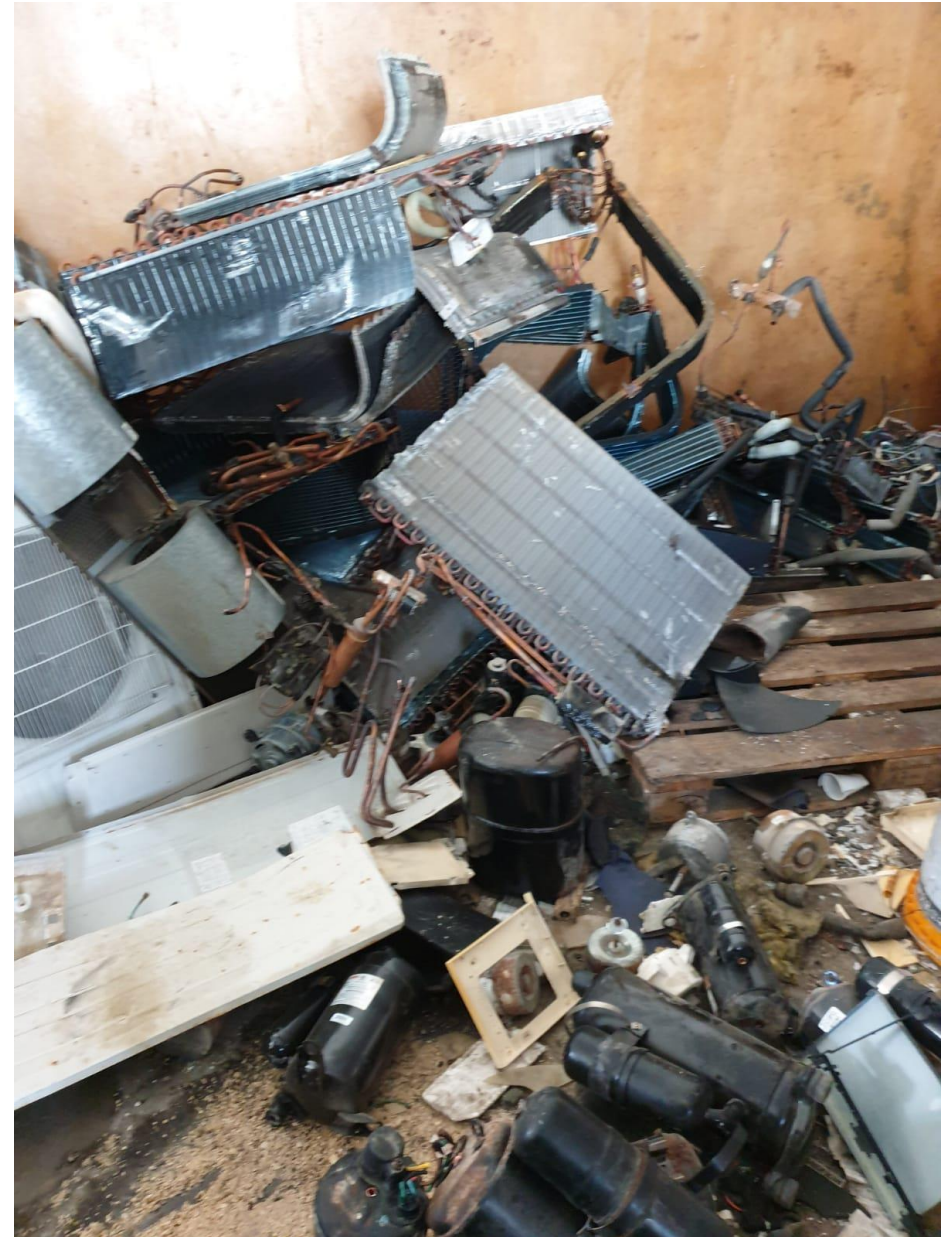
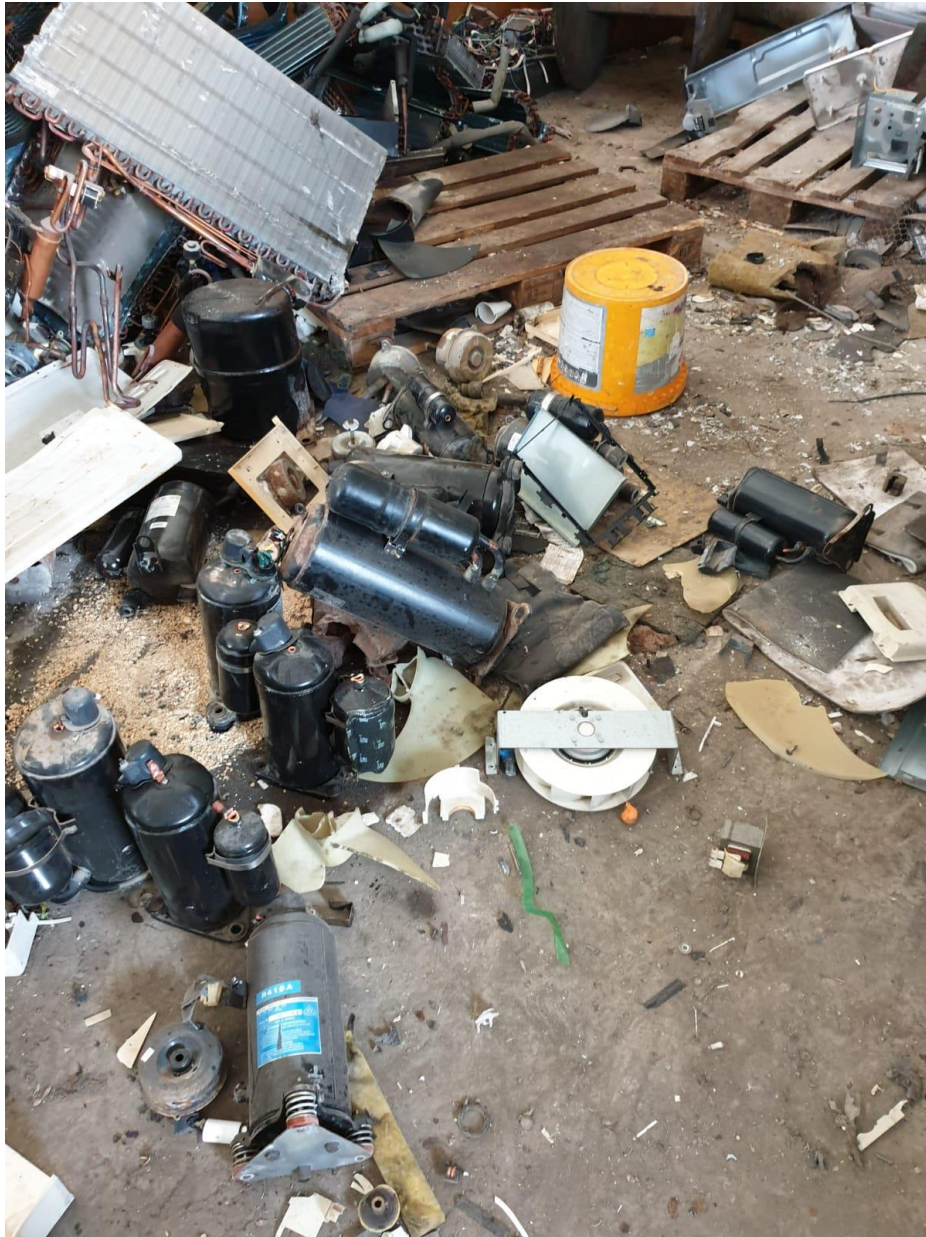
		document refers to baling of non-hazardous waste, applicant is to provide the technical specifications of the equipment used for such activity, including its daily maximum processing capacity and its associated maintenance program. The location of this equipment is to be indicated in an updated layout plan.	materials within the facility arrive onsite pre-baled.				
C2.6	✓	Noted.					
C2.7	✓	Noted.					
C2.8	✓	Noted.					
C2.9	✓	Noted.					
C2.10	✓	Noted.					
C2.11	✓	Noted.					
C3.1	✓	With reference to C3.1.2, applicant is to provide the maximum storage capacity of each incoming and outgoing waste	The maximum site storage capacity for all of the waste streams handled onsite has been	Noted.			

		<p>stream at any one time which reflects the submitted layout plan.</p> <p>With reference to C3.1.3, applicant is to provide information on whether each of the exported waste described in the flow diagram shall be sent for disposal or recovery.</p>	<p>included in Section 4.2 of the Form C report. All activity areas are already mapped in Figure 1 (Section 4.2.1 of the Form C report).</p> <p>It is not possible to say what will happen specifically to each of the individual waste streams once they are exported as it varies depending on the company to which the material is exported. The export company also varies depending on the prices</p>				
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			offered by the company at the time of export.				
C3.2	✓	Noted.					
C3.3	✓	Noted.					
C3.4	✓	Noted.					
C3.5	✓	Noted.					
C3.6	✓	Noted.					
C3.7	✓	Noted.					
C3.8	✓	Noted.					
C3.9	✓	Noted.					
C3.10	✓	Noted.					
C3.11	✓	Flow diagram is to be updated to indicate all the newly proposed processes as described in C 2.2.1 above.	The dismantling of WEEE is limited to the removal of the plastic casing from AC units. Therefore, there is no need to update the flow diagram.	Noted.		With reference to comment in Section C2.2.1 above, applicant is to confirm whether flow diagram is to be updated.	N/A Refer to reply to comment 2.2.1
C4.1	✓	Noted.					
C4.2	✓	Noted.					
C5.1	✓	Noted.					
C6.1	✓	Noted.					
C6.2	✓	Noted.					
C6.3	✓	Noted.					
C7.1	✓	Noted.					
C8.1	✓	Noted.					
C8.2	✓	Noted.					

C9.1	✓	Noted.					
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Annex 1





2.0 Statutory Consultation Review

Annex II: Feedback received following the Statutory Consultation carried out for the application of variation (application IP0004/13) of the AGV Non Ferrous Ltd. carried out between 10 April 2019 – 29 April 2019

Comment received by	Feedback	ERA reply and comment - 25.6.19	AGV Non Ferrous Ltd. reply
External Consultees Feedback			
Environmental Health Directorate	<p>The proposed renewal and variations of activities at AGV Non include the temporary storage and dismantling of air conditioning (waste electrical and electronic equipment, WEEE) and storage/export of additional batteries and accumulator types.</p> <ol style="list-style-type: none"> 1. With these variations the Directorate has no objection; 2. No litter is to exit the scheme. 3. Local and EU regulations related to hazard and non hazard waste must be strictly adhered to. 4. Pest Control. 5. All mitigation and monitoring programmes regarding adverse impacts arising from this operation are to be implemented by applicant to mitigate any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and the general public. 6. Unpredicted impacts and nuisances which may arise from this operation and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken; 7. Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested. 	These will be included as permit conditions.	Noted.
Malta Competition and Consumer Affairs Authority	No comments were received.	N/A	N/A
Malta Resources Authority	Please note that we have no comments on this application.	No further comments.	N/A

Comment received by	Feedback	ERA reply and comment - 25.6.19	AGV Non Ferrous Ltd. reply
	However, please note that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations have been excluded from the remit of Malta Resources Authority and as such the MRA has no authority to take a position on matters regulated by these regulations or indeed any other matter that does not fall within its remit.		
Planning Authority	No comments were received.	N/A	
Regulatory for Energy and Water Services	Following are comments from the Regulator for Energy and Water Services (REWS). Please inform AGV Non Ferrous that if there are any fuel storages on site, these should be duly registered with the Regulator and questions on how to apply may be sent to enquiry@rews.org.mt . Otherwise, the REWS has no further comments on those documents submitted by means of the AGV CD of April 2019.	Operator to confirm whether there are any fuel storage on site and if this is the case, the IPPC Application will need to be updated accordingly.	No fuels are stored onsite.
Civil Protection Department	It is important for the claimant, to have good management of water especially for firefighting water in case of an incident were large volumes of water could be used which could be more than what the system is designed for. It is also important that all hazards handled on site have the respective hazard-warning symbol. The employees are trained in handling small fires from growing into big ones and that they are certified.	The facility is part of an industrial complex and has mains water supply. Operator to provide information as to how water for firefighting is managed on site including any available flow rates, access to fire fighting reservoirs and the fate of any used firewater. Operator is to make reference to the BAT Conclusion No. 21(b) in providing adequate replies. These will be included as permit conditions.	The main and preferred firefighting system onsite utilises foam fire extinguishers. Foam is preferred over water due to the nature of the materials onsite. Water will only be used to extinguish fires in extreme cases. In such cases water will be sourced from the mains supply. There are no reservoirs located onsite. The used firewater will be contained within the bunded garage area. The waste water will then be collected into a bowser and disposed of as hazardous waste. Kindly refer to the fire plan for further information Noted.
Water Services Corporation	From the aspect of Discharges into Sewers I have the following comments: <ul style="list-style-type: none"> • IPPC permit Clause 2.2.3 is to remain in place; • IPPC permit Clause 2.2.3.1 is to be enforced by setting a hard deadline (1 month) since no application for a Public Sewer Discharge Permit has ever been received by our office for this entity. Even though the entity may not be discharging trade effluent, WSC still deems that they should apply for a permit. • I think it is pertinent to add a condition stating that any wastewater from floor washing operations are to be collected in a separate container and treated as trade effluent. Discharge of such effluent is to be made through a separate public sewer discharge permit application. 	Operator to take note and apply for a sewer discharge permit is required. This will be included as an improvement programme item in the permit and will be required to be fulfilled within one month of granting of the permit. As per replies to ERA Review in Section A1.4, operator has installed a low-lip so that any spills or wash water is contained inside the garage. However, operator is yet to provide an engineer's or architect's certification showing how that the capacity of each bund shall be a minimum of 110% of the largest container within the bund or 25% of	Noted. The applicant is in the process of commissioning a warranted engineer to carry out the survey and issue the necessary certification. Kindly include in the improvement programme.

Comment received by	Feedback	ERA reply and comment - 25.6.19	AGV Non Ferrous Ltd. reply
	<ul style="list-style-type: none"> Domestic effluent is to be separated from trade effluent prior to discharge to sewer system. Any incoming waste containing liquids should be stored in a bunded area or on spill trays to make sure that any leaking liquids are contained. 	<p>the total capacity of all the containers within the bund, whichever is the greater is required for this garage. This shall consider any floor drains on site.</p> <p>Suggested conditions 3,4 and 5 will be included the IPPC Permit.</p>	Noted.
OHSA	With reference to the IPPC application variation AGV Non Ferrous (IP 04/13), OHSA finds no objection to its approval by ERA, provided that the employer abides with Act XXVII of 2000 and all relevant OHS regulations.	This will be included as a permit condition.	Noted.
Internal Consultees Feedback			
Environmental Assessment Unit	In view of the fact that the proposal does not involve the processing of any hazardous waste (i.e. depollution of WEEE), there are no additional comments from our end.	No further comments since this application for variation is not proposing any WEEE depollution processes.	N/A
Biodiversity & Water Unit	No comments were received.	N/A	N/A
Air quality & Waste Unit Air Quality Team	No comments were received.	N/A	N/A
Air quality & Waste Unit Waste Management Team	Please note that the Waste Team has no specific comments.	No further comments.	N/A
Air quality & Waste Unit Noise Team	Kindly note that in view that the site activities do not result in significant amounts of noise, we are suggesting that the annual noise study is carried out normally for the first year of permit so the outcome is assessed accordingly and then this would determine the need or frequency of future studies.	The permit will require noise monitoring during the first year of the permit.	Noted.
Compliance & Enforcement Directorate	<p>Kindly find comments below:</p> <p>A 1.4 – Improvement Programme item 3 is not requiring a CV of the TCP – this is IP Item 4. IP Item 3 requires the TCP to undergo dangerous goods handling training and to provide certification of such training. Please note that this has not yet been submitted.</p>	Operator is to provide certification showing the TCP has completed training to handle dangerous goods or alternatively evidence showing by when such training will be completed.	<p>The TCP (Mr Frank Cachia) has applied for a course at MCAST called <i>MG2I-C0429 Waste Collection and Transportation of Waste (NEW)</i>. The course will only be held once there are enough applicants to make the course feasible.</p> <p>The email correspondence between Mr Cachia, MCAST and ERA (Dorianne Galea) is included as a separate document with this application.</p>

Comment received by	Feedback	ERA reply and comment - 25.6.19	AGV Non Ferrous Ltd. reply
	<p>C 2.2.1 – CED reiterates that on 3 separate occasions in 2018 dismantling of air conditioners was found to be taking place and this was NOT limited to removal of plastic casing, but in fact consisted of a full dismantling of the unit. Furthermore, correspondence from AGV to the consultants (in which ERA were copied) dated 19.09.2018, indicates that the operator is aware that he was operating beyond what he is permitted to do, and asked that the consultants apply for a variation to permit for this activity.</p> <p>C 3.11 – See point on C 2.2.1 above</p> <p>It is also being suggested that the site layout plan (Figure 4.2.1) of Form C Report v3 is refined further to give a better idea of what waste will be located where, as haz and non haz wastes should be kept separate. ‘Reception area for incoming waste material’, ‘Storage area for incoming waste’, ‘Storage area for sorted waste’, and ‘Storage Area’ are too generic. As part of the permit, EPU may wish to consider requiring signage for the different designated areas to be implemented.</p>	<p>The proposed IPPC variation application covers the dismantling of AC units limited to removal of the plastic casing only. Operator is to confirm either the intention to resume with the processing of the application as is (i.e. restricting dismantling of WEEE to removal of the plastic casing only) or otherwise. If the operator intends to continue full dismantling of the units, an updated variation application is to be submitted to ERA for consideration.</p> <p>Operator is to provide a more detailed site layout plan. This is to clearly show the storage location of each separate EWC code and how hazardous waste is kept separate from non-hazardous waste. The permit would require each dedicated waste storage area to be appropriately signed for the EWC that are being stored therein.</p>	<p>The proposed activities related to the ACs units will involve the removal of the plastic casings only.</p> <p>The site layout plan, presented in Figure 1 of the Form C report, has been revised accordingly.</p> <p>The requirement of signs labelling each area with the appropriate EWC code is noted.</p>

3.0 ERA Site Inspection Report (17/02/2020)

Inspection Report - AGV Non-Ferrous Ltd

Inspection date: 17th February 2020
ERA officers: Stefan Montebello, Simon Farrugia

Observations

Aspect	Detailed observations	Action to be taken by operator
Operations on site	At the time of the inspection, no works on site were noted.	No actions required
Waste stored on site	<p>During the site visit, both garages were full of pallets of batteries. One of the garages contained mostly lead batteries (car batteries). At the back of the garage, there was also a storage area for metal parts.</p> <p>The second garage contained the remaining batteries. Whilst the majority of these were either plastic wrapped ready to be shipped, two jumbo bags were observed. This jumbo bag contained a mixture of types of batteries, including alkaline batteries and other batteries such as laptop batteries. Operator claimed that such batteries are collected in a mixed state.</p> <p>The second garage also contained a small number of air conditioner units (Photo 1) which were positioned behind battery pallets.</p>	<p>No actions required.</p> <p>Operator is to note that the current permit does not allow for the collection of mixed batteries with EWC 20 01 33*. Operator is to ensure that no further mixed batteries are accepted to the facility prior to notification by ERA via the granting of the variation being proposed.</p> <p>Within 1 week of the date of this report, the operator is to remove all WEEE (A/C units) on site and provide the consignment notes that were used.</p>
Garage Bunding	A lip was noted at the edge of the garage to contain any spills. At the back of one the garages, a gutter was noted adjacent to the raised shower (Photo 2).	Operator is to describe the fate of any effluent which passes through the gutter. This is to include details whether this is discharged to a dedicated cesspit, public sewer or elsewhere.
Waste Tracking System	Operator was asked about how the waste tracking system works on site. Operator explained how he would have records of when a batch arrives on site but no labelling of the batch is done. Batch identification is done by the operator only who claims to identify the batches from memory and via battery brand name.	As per the submissions in the IPPC variation application, operator is to use the templates submitted for the waste tracking system. The system proposed includes assigning a tracking number to each batch and therefore each batch that arrives on site is to be clearly labelled with a tracking number.



Photo 1: AC Units stacked behind batteries



Photo 2: Gutter adjacent to raised shower

A blue ink signature, appearing to be 'Stefan Montebello', written over a horizontal line.

Stefan Montebello

Assistant Environment Protection Officer

Permitting Unit

A blue ink signature, appearing to be 'Simon Farrugia', written over a horizontal line.

Simon Farrugia

Senior Officer

Permitting Unit

4.0 Applicant Action in Response to ERA Site Inspection (17/02/2020)

Applicant Action Following ERA Site Inspection on 17th February 2020

Aspect	Detailed observations	Action to be taken by operator	Action taken by operator as on 17th April 2020
Operations on site	At the time of the inspection, no works on site were noted.	No actions required	-
Waste stored on site	<p>During the site visit, both garages were full of pallets of batteries. One of the garages contained mostly lead batteries (car batteries). At the back of the garage, there was also a storage area for metal parts.</p> <p>The second garage contained the remaining batteries. Whilst the majority of these were either plastic wrapped ready to be shipped, two jumbo bags were observed. This jumbo bag contained a mixture of types of batteries, including alkaline batteries and other batteries such as laptop batteries. Operator claimed that such batteries are collected in a mixed state.</p> <p>The second garage also contained a small number of air conditioner units (Photo 1) which were positioned behind battery pallets.</p>	<p>No actions required.</p> <p>Operator is to note that the current permit does not allow for the collection of mixed batteries with EWC 20 01 33*. Operator is to ensure that no further mixed batteries are accepted to the facility prior to notification by ERA via the granting of the variation being proposed.</p> <p>Within 1 week of the date of this report, the operator is to remove all WEEE (A/C units) on site and provide the consignment notes that were used.</p>	<p>-</p> <p>Noted.</p> <p>The AC units have been removed from site. The receipt for the delivery of the units to an approved waste management facility is provided in Figure 1 below.</p>
Garage Bunding	A lip was noted at the edge of the garage to contain any spills. At the back of one the garages, a gutter was noted adjacent to the raised shower (Photo 2).	Operator is to describe the fate of any effluent which passes through the gutter. This is to include details whether this is discharged to a dedicated cesspit,	Any water which accidentally splashes from the shower into the drain flows into the public sewer system.

5.0 Decommissioning Plan

Decommissioning Plan for AGV Non Ferrous Malta

As per ERA requirements for IP 0004/13/A

Decommissioning Plan

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1.0 Scope

AGV Non Ferrous Malta has commissioned AIS Environment to prepare a decommissioning plan for their facility. The decommissioning plan is required to fulfil Condition 2.9.2 of the facility's IPPC Permit (IP 0004/13/A):

2.9.2 The operator shall draft and maintain an Outline Decommissioning Plan for the installation. This Outline Decommissioning Plan shall at least include the following information:

2.9.2.1 A draft waste management strategy which shall include:

- *The identification and characterisation of source, types of wastes (including equipment, tanks, fuels and by-products);*
- *Criteria for segregation of wastes;*
- *Proposed treatment, conditioning, transport, storage and disposal/recovery methods;*
- *Potential reuse/recycling of such wastes.*

2.9.2.2 A qualitative assessment of the potential for contamination of land and groundwater pollution which might arise from the historical and current processes carried out at the installation.

2.0 Introduction

2.1.1 Site Location

The AGV Non Ferrous Malta facility is located on the outskirts of Mqabba, in the South Western area of Malta. It is housed within Garages 41 and 42 of the Ta'Ghadajma warehouse complex (refer to **Error! Reference source not found.**).

2.1.2 Site Activities

AGV Non Ferrous Malta operates a waste management facility. The facility handles both hazardous and non-hazardous waste, in accordance with the current IP Permit (IP 0004/13/A). The hazardous waste handled onsite at the facility is composed of batteries and accumulators. The batteries are temporarily stored onsite until they are packed and exported.

Non-hazardous waste, comprising of waste packaging, paper, cardboard, plastic, rubber, ferrous and non-ferrous metals, are also temporarily stored onsite. The materials are separated according to type and stored in designated storage areas. The individual non-hazardous waste streams are then transferred to other local facilities or exported via registered waste brokers.

AGV Non Ferrous Malta is in the process of applying for a variation in their current IPPC Permit to enable them to handle WEEE, specifically air conditioning units. The processing of the units will be basic and restricted to the dismantling of the equipment to remove the plastic casing from the main unit. The variation application also covers the handling, storage and export of additional types of batteries and accumulators. These activities are included in this Decommissioning Plan.

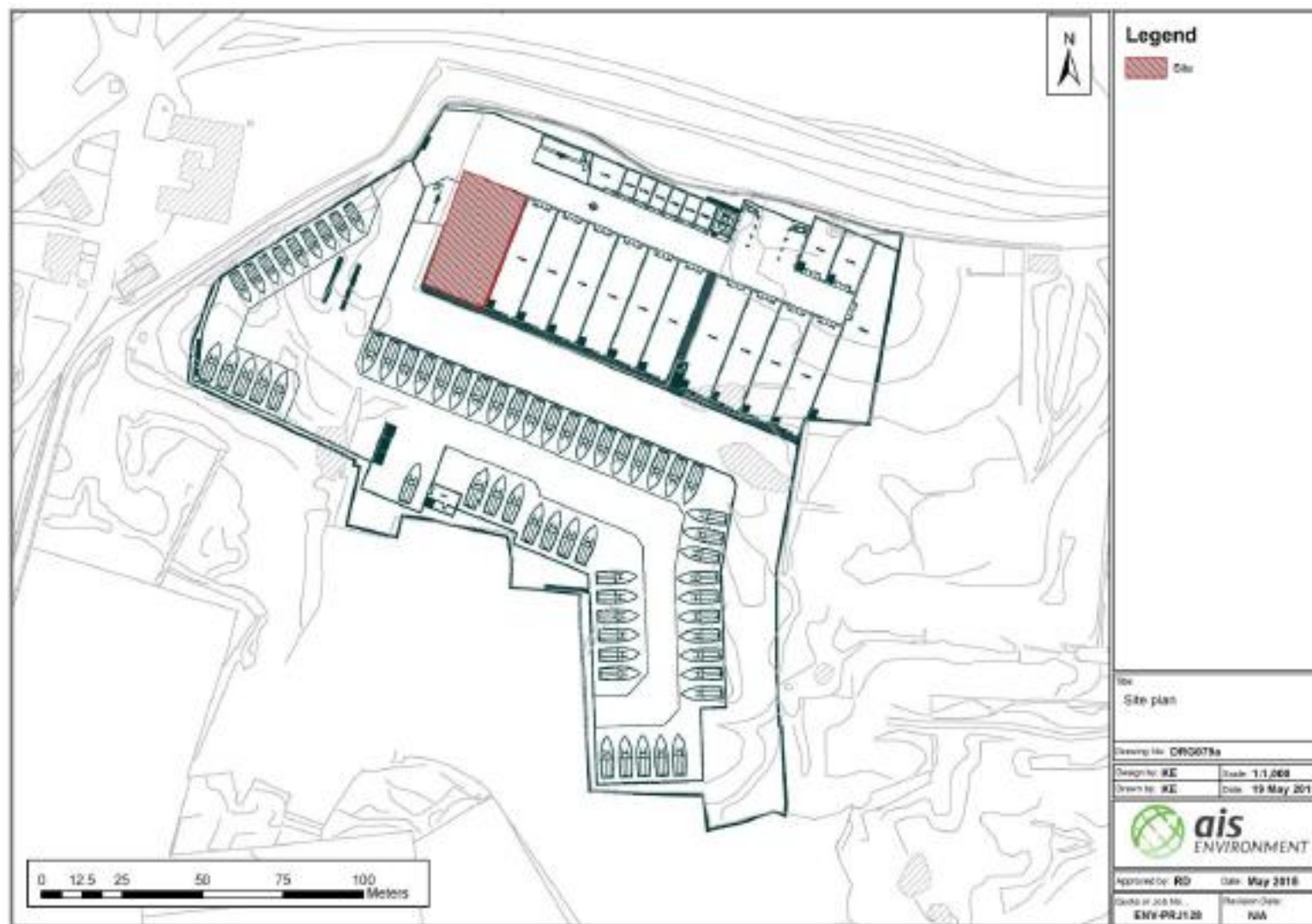


Figure 1: Location of the AGV Non Ferrous Malta facility within the Ta'Ghadajma warehouse complex

3.0 Removal of Waste from Site

Due to the nature of the activities carried out at the AGV Non Ferrous Malta facility, the only waste that will be present onsite at the decommissioning stage is any waste which is stored on site prior to being sold locally or exported.

In the case that AGV Non Ferrous ceases operations, all of the waste onsite will be sold to other local waste management facilities within the Maltese Islands. The waste will be transported using appropriate licensed waste carriers and taken to registered facilities. It is not possible to state at this time if the waste will be disposed of or recovered as it depends to which company the waste will be sold to.

Table 1 outlines the individual waste streams that will be present onsite and how they will be removed from the facility. It should be noted that no fuel is kept onsite and therefore, will not be present during the decommissioning on the facility.

Table 1: Summary of the waste present on site and how it will be removed should AGV Non Ferrous cease operating

Waste Stream	EWC Code	Maximum Quantity (tonnage)	Segregation	Treatment	Transport Offsite	Disposal/Recovery Method and Location
Paper and cardboard packaging	15 01 01 19 12 01	20	The paper and cardboard packaging should have already been separated from the other waste streams and stored within a designated area. If this has not already been done at the time of decommissioning, the waste will be separated as during normal operating procedures. The separated waste will be stored in the designated area until it is transported offsite.	N/A	The waste will be transported offsite by an appropriately licensed waste carrier.	The waste will be taken to another local licensed waste management facility. The waste will either be disposed or recovered depending on the permitted activities at the chosen waste management facility.
Plastic and rubber	15 01 02 16 01 19 17 02 03 19 12 04 20 01 39	35	The plastic and rubber should have already been separated from the other waste streams and stored within a designated area. If this has not already been done at the time of decommissioning, the waste will be separated as during normal operating procedures. The separated waste will be stored in the designated area until it is transported offsite.	N/A	The waste will be transported offsite by an appropriately licensed waste carrier.	The waste will be taken to another local licensed waste management facility. The waste will either be disposed or recovered depending on the permitted activities at the chosen waste management facility.
Waste packaging	15 01 03 15 01 04	20	The waste packaging should have already been separated from the other waste streams and stored within a designated area. If this has	N/A	The waste will be transported offsite by an appropriately	The waste will be taken to another local licensed waste management facility. The waste will either be disposed

	15 01 06 15 01 07		not already been done at the time of decommissioning, the waste will be separated as during normal operating procedures. The separated waste will be stored in the designated area until it is transported offsite.		licensed waste carrier.	or recovered depending on the permitted activities at the chosen waste management facility.
Ferrous and non-ferrous metals	16 01 17 16 01 18 17 04 01 17 04 02 17 04 03 17 04 04 17 04 05 17 04 07 17 04 11 19 10 02 19 12 02 19 12 03 20 01 40	70	The ferrous and non-ferrous metals should have already been separated from the other waste streams and stored within a designated area. If this has not already been done at the time of decommissioning, the waste will be separated as during normal operating procedures. The separated waste will be stored in the designated area until it is transported offsite.	N/A	The waste will be transported offsite by an appropriately licensed waste carrier.	The waste will be taken to another local licensed waste management facility. The waste will either be disposed or recovered depending on the permitted activities at the chosen waste management facility.
Batteries and accumulators	16 06 01* 16 06 02* 16 06 04 16 06 05 16 06 06* 20 01 33* 20 01 34	160	The batteries and accumulators should have already been separated from the other waste streams and stored within a designated area. If this has not already been done at the time of decommissioning, the waste will be separated as during normal operating procedures. The separated waste will be stored in the designated area until it is transported offsite.	N/A	The waste will be transported offsite by an appropriately licensed waste carrier.	The waste will be taken to another local licensed waste management facility. The waste will either be disposed or recovered depending on the permitted activities at the chosen waste management facility.
WEEE	16 02 11*	3	The WEEE should have already been separated from the other waste streams and stored within a	N/A	The waste will be transported offsite by an appropriately	The waste will be taken to another local licensed waste management facility. The

(from air conditioning units)			designated area. If this has not already been done at the time of decommissioning, the waste will be separated as during normal operating procedures. The separated waste will be stored in the designated area until it is transported offsite.		licensed waste carrier.	waste will either be disposed or recovered depending on the permitted activities at the chosen waste management facility.
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4.0 Removal of Machinery

The machinery at the AGV Non Ferrous Malta facility comprises of:

- » 1 fork lifter
- » 2 manual pallets

All of the above pieces of equipment would be transferred to an alternative site or sold locally if AGV Non Ferrous Malta was to stop operating.

5.0 *Cleaning of the Site*

Once all waste materials and equipment are removed from the facility, two empty garages with impermeable concrete floors would remain. The floors of the garages will be swept using a dry brush. No water or cleaning detergents will be used. This will eliminate the risk of any potentially contaminated water entering the ground water system.

No other cleaning will be necessary.

6.0 Qualitative Assessment of Pollution Risks

The activities carried out at the AGV Non Ferrous Malta facility do not result in the generation of any form of emissions to air, land or ground water. The operations are confined to within the two garages. Both of these garages are sealed off with impermeable concrete flooring. Therefore, any spills or leakages are contained within the site. Spill kits are also present on site to deal with any such occurrences promptly and effectively. Furthermore, the premises are located above another commercial facility, which also has an impermeable concrete floor. Therefore, it is highly unlikely that any pollution disperses into the surrounding environment during the operations of AGV Non Ferrous Malta.

In the case that AGV Non Ferrous ceases operating, any unsorted waste on site will have to be sorted and subsequently all waste will have to be removed from the facility. This is very unlikely to result in the release of any pollutants into the surrounding environment.

The risk of contamination has been assessed for each of the individual waste streams present on site; including the severity of the event, probability of occurrence and overall risk level (refer to Table 5). The criteria for this assessment is outlined in Table 2 to Table 4.

Should the facility be demolished after AGV Non Ferrous vacate the premises, it is also very unlikely that any contaminants would be released into the surrounding environment. This is due to the impermeable nature of the floor that has been described above, which will not be able to contain any pollutants. In addition, the location of the facilities above another premises, means that if somehow any liquids were present on site they would not be able to enter the groundwater due to the impermeable floor of the underlying garage.

Table 2: Severity of contamination scenario

Descriptor	Numeric Rating	Definition
Catastrophic	5	Very serious environmental effects with impairment of ecosystem function. Long term, widespread effects on significant environment.
Critical	4	Serious environmental effects with some impairment of ecosystem function. Relatively widespread medium-long term impacts.
Marginal	3	Moderate effects on biological or physical environment (e.g. air, water_ but not affecting ecosystem function. Moderate short/medium-term widespread impacts (e.g. significant spills).
Negligible	2	Minor effects on biological or physical environment. Minor short/medium-term damage to small area of limited significance.
Insignificant	1	No land and ground water environmental contamination by release. Limited damage to minimal area of low significance.

Table 3: Probability of contamination scenario

Descriptor	Rating	Definition	Guideline Frequency
Almost Certain	A	Consequence is expected to occur in most circumstances	Occurs more than once per month
Likely	B	Consequence will probably occur in most circumstances	Occurs once every 1 month to 1 year
Occasionally	C	Consequence should occur at some time	Occurs once every 1 year to 10 years
Unlikely	D	Consequence could occur at some time	Occurs once every 10 years to 100 years
Rare	E	Consequence may only occur in exceptional circumstances	Occurs less than once every 100 years

Table 4: Risk matrix

		Consequence				
		Insignificant	Minor	Moderate	Major	Catastrophic
Likelihood	Almost Certain	Low	Moderate	Extreme	Extreme	Extreme
	Likely	Low	Moderate	High	Extreme	Extreme
	Occasionally	Very Low	Moderate	High	High	Extreme
	Unlikely	Very Low	Low	Moderate	High	High
	Rare	Very Low	Very Low	Moderate	Moderate	High

Table 5: Qualitative assessment of decommissioning contamination scenarios

Potential Source of Contamination	EWC Code	Activity	Contamination Scenario	Receptor			Severity	Probability of Contamination Occurring	Risk Level WITHOUT Mitigation Measures	Mitigation Measures	Risk Level WITH Mitigation Measures
				Land	Air	Groundwater					
Paper and cardboard packaging	15 01 01 19 12 01	Temporary storage	Material exposed to the elements	Yes	No	No	2	D	Low	All waste is stored indoors	Very low
		Sorting and packaging	Material exposed to the elements	Yes	No	No	2	D	Low	Activity carried out indoors	Very low
		Removal from site	Material exposed to the elements	Yes	No	No	2	D	Low	Waste packaged in approved packaging Transported by appropriately licensed waste carrier	Very low
Plastic and rubber	15 01 02 16 01 19 17 02 03 19 12 04 20 01 39	Temporary storage	Material exposed to the elements	Yes	No	No	1	D	Very low	All waste is stored indoors	Very low
		Sorting and packaging	Material exposed to the elements	Yes	No	No	1	D	Very low	Activity carried out indoors	Very low
		Removal from site	Material exposed to the elements	Yes	No	No	1	D	Very low	Waste packaged in approved packaging Transported by appropriately licensed waste carrier	Very low
Waste packaging	15 01 03 15 01 04 15 01 06 15 01 07	Temporary storage	Material exposed to the elements	Yes	No	No	2	D	Low	All waste is stored indoors	Very low
		Sorting and packaging	Material exposed to the elements	Yes	No	No	2	D	Low	Activity carried out indoors	Very low
		Removal from site	Material exposed to the elements	Yes	No	No	2	D	Low	Waste packaged in approved packaging Transported by appropriately licensed waste carrier	Very low
Ferrous and non-ferrous metals	16 01 17 16 01 18 17 04 01 17 04 02 17 04 03 17 04 04 17 04 05 17 04 07 17 04 11 19 10 02 19 12 02 19 12 03 20 01 40	Temporary storage	Material exposed to the elements	Yes	No	No	1	D	Very low	All waste is stored indoors	Very low
		Sorting and packaging	Material exposed to the elements	Yes	No	No	1	D	Very low	Activity carried out indoors	Very low
		Removal from site	Material exposed to the elements	Yes	No	No	1	D	Very low	Waste packaged in approved packaging Transported by appropriately licensed waste carrier	Very low
Batteries and accumulators	16 06 01* 16 06 02* 16 06 04 16 06 05 16 06 06* 20 01 33* 20 01 34	Temporary storage	Spillage of acid due to mishandling and/or use of damaged containers	Yes	No	Yes	1	C	Very low	Batteries stored correctly and kept in an upright position All waste is stored indoors Garage has impermeable concrete floor Premises located about third party garage Spill kits onsite	Very low
		Sorting and packaging	Spillage of acid due to mishandling and/or	Yes	No	Yes	1	C	Very low	Batteries stored correctly and kept in an upright position	Very low

			use of damaged containers							All waste is stored indoors Garage has impermeable concrete floor Premises located about third party garage Spill kits onsite	
		Removal from site	Spillage of acid due to poor packaging	Yes	No	Yes	3	C	High	Waste packaged in approved packaging Transported by appropriately licensed waste carrier	Moderate
WEEE (from air conditioning unit)	16 02 11*	Temporary storage	Material exposed to the elements	Yes	No	No	2	D	Low	All waste is stored indoors	Very low
		Sorting and packaging	Material exposed to the elements	Yes	No	No	2	D	Low	Activity carried out indoors	Very low
		Removal from site	Material exposed to the elements	Yes	No	No	2	D	Low	Waste packaged in approved packaging Transported by appropriately licensed waste carrier	Very low

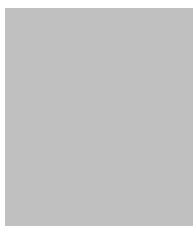
7.0 Review of the Decommissioning Plan

A complete review of the Decommissioning Plan will be carried out at least once every four years in order to comply with Condition 2.9.3 of the IPPC Permit (IP 0004/13/A).

6.0 Frank Cachia CV

PERSONAL INFORMATION

FRANK CACHIA



 DIELJA, TRIQ LUNZJATA, SAN GWANN, MALTA

 +356 99846461

 frankcacia@gmail.com



Sex MALE | Date of birth 06/08/1970 | Nationality MALTESE

WORK EXPERIENCE

AGV GROUP MALTA – Sole Shareholder & Sole Director – 1987 to date

Sole Shareholder & Sole Director – AGV NON FERROUS MALTA LTD (Waste Management)

Sole Shareholder & Sole Director – FOREST GREEN LTD (Property Development)

Sole Shareholder & Sole Director – MALTA FOOTBALL ACADEMY (Sports Related)

Shareholder & Director – MALTA SHOOTING ACADEMY (Sports Related)

Sole Shareholder & Sole Director – SPORTS INFRASTRUCTURE LTD (Sports Infrastructure & Turnkey Projects)

Main Shareholder – Marsaxlokk Football Club Commercialisation (President of Marsaxlokk Football Club)

EDUCATION AND TRAINING

EDUCATION – Stella Maris College, Gzira

University of Portsmouth – Accessibility Audit

University of Malta – Bachelor of Commerce

Mother tongue(s) Maltese

Other language(s)

	UNDERSTANDING		SPEAKING		WRITING
	Listening	Reading	Spoken interaction	Spoken production	
English	A	A	A	A	B

Italian

B	B	B	B	C

Organisational / managerial skills

Leading projects of my companies with my employees

Job-related skills

▪ All companies fall under AGV Group Malta and Customer Service is companies main objective

Digital skills

SELF-ASSESSMENT				
Information processing	Communication	Content creation	Safety	Problem solving
B	C	A	B	A

Other skills

Replace with other relevant skills not already mentioned. Specify in what context they were acquired.
Example:

▪ carpentry

Driving licence

B

ADDITIONAL INFORMATION

Publications

Accessibility Audit – 1st Publication 1999

7.0 EMS

Environmental Management System for AGV Non Ferrous Malta

Extracted from the original IPPC application IP 0004/13/A

EMS Report

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Internal Check	Sacha Dunlop	
Internal Approval	Mario Schembri	

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1.0 Management and Reporting Structure

The plant is located in the outskirts of Mqabba, in garage number 41 and 42 in a site called Ta' Għadajma, and operates at the address AGV Group, Braret Street, Birkirkara. The facility has an area of approximately 116m² divided into two stores of the mentioned site, having more than 4,000m² of land. Ta' Għadajma is owned by Mr John Bonavia & Mr John Micallef, and is divided into a small yacht yard and a number of stores not bigger than 58m² each, all with a different owner. A site layout plan is provided in (Figure 1).

The person who will be responsible for managing environmental aspects of the installation is Mr Frank Cachia, who is the also the Managing Director and the Technically Competent Management.

The Curriculum Vitae of Mr Cachia is provided in Appendix 1.

Contact number: +356 99846461

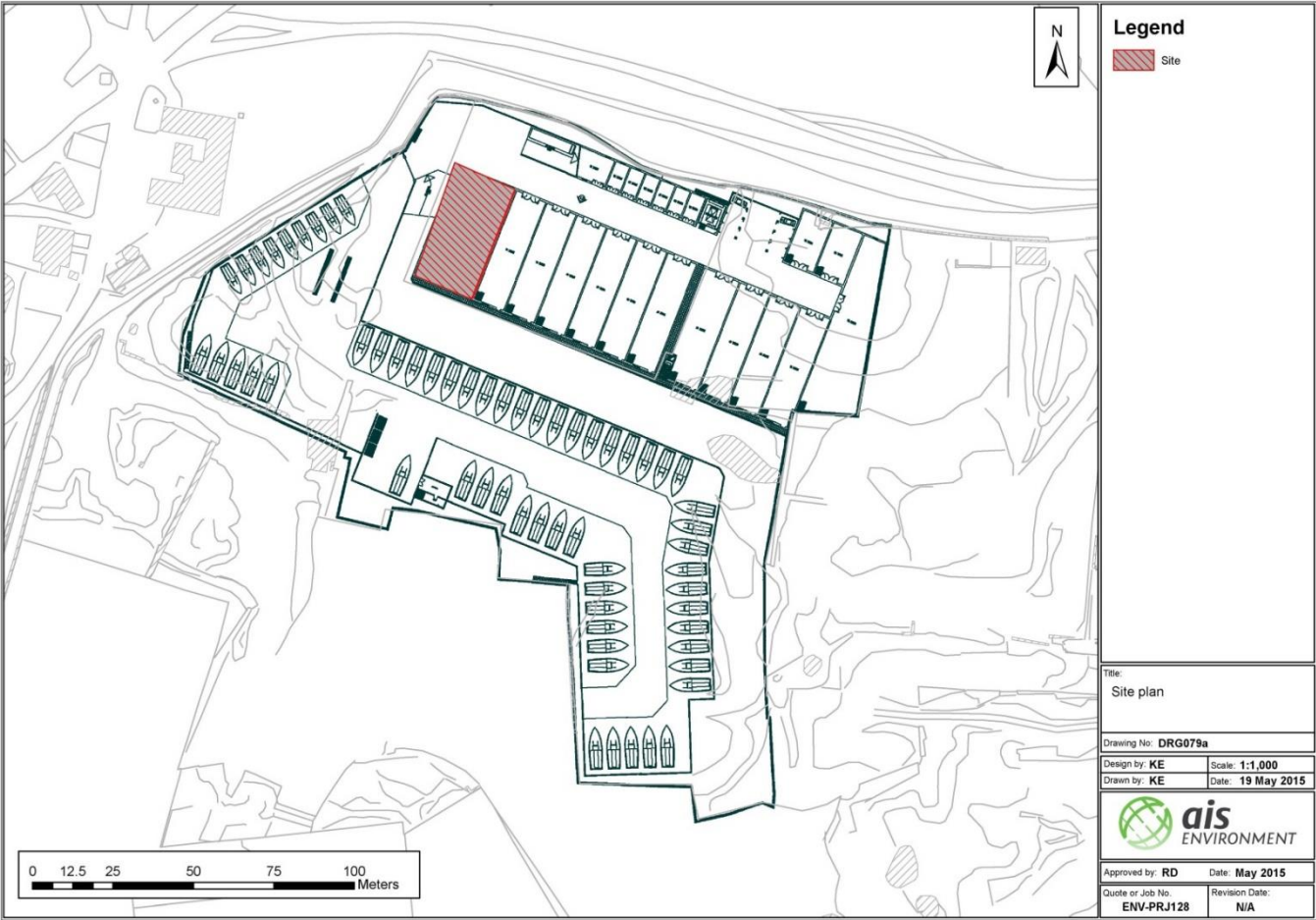


Figure 1: Site layout plan of permitted installation

2.0 Environmental Policy

AGV Non Ferrous Malta Ltd commits itself to protect the environment and to prevent and minimise any potential impact arising from the operations of the facility on the social and physical environment and in particular to take every appropriate action to:

- » Reduce the impact on the traffic,
- » Minimise the generated waste,
- » Employ recycling practices as much as possible,
- » Employ noise and vibration reduction measures,
- » Control dust and odour emissions to the environment,
- » Consider the development of new and cleaner technologies whenever available,
- » Protect the surface and groundwater resources,
- » Exercise caution when working in vicinity of areas of ecological, geological and agricultural importance,
- » Comply with relevant authorisations for discharges,
- » Protect any cultural heritage features,
- » Prevent pollution of land and incidents leading to pollution,
- » Minimise the environmental impact caused from the potential decommissioning of the facility.

In order to achieve this aim, AGV Non Ferrous Malta Ltd shall motivate, train and empower the employees to apply this policy. This policy, driven by the Technically Competent Management, establishes a framework for a management approach designed to promote environmental excellence of work practices and performance. The employees and any sub-contractors shall undertake their responsibilities in compliance with the requirements of all applicable environmental legislation, chiefly L.N. 337 of 2001, L.N. 106 of 2007, L.N. 55 of 2010 (amended to L.N. 245 of 2011).

3.0 *Environmental Objectives and Targets*

- » It is the responsibility of the directors of AGV to ensure that the projected objectives are adhered to. These targets are to be reviewed and revised on an annual basis. Modifications from set objectives need to be flagged during the audit process with reasons pertaining to such modifications being made in writing.
- » The aim of AGV is to extract the maximum resources out of the waste material delivered to its facilities both through collection operations and from deliveries by third parties. This can be achieved through adequate storage keeping in mind the waste hierarchy with special attention to waste minimization followed by re-use, recovery and recycling.
- » The aim of the facility is to have a zero-waste operation whereby unrecoverable material is only sent for disposal. The level of performance of the facility is dependent upon the incoming material. Hence the first step to reduce waste is through the acceptance of good quality scrap for the purpose of the facility's operation. This can be achieved through strict inspection prior to loading (in the case of internal collection operation) or prior to accepting the material at the gate.
- » Innovation also plays an important role in moving towards a zero-waste operation. This can be achieved through the investigation of alternative reuse, reduction, recycling routes for current non usable material currently being disposed of in landfill.
- » The company also aims to make efficient use of the available resources i.e. electricity, water and fuel. Although the consumption of such resources is rather low on the premises, the applicant plans to: i) service operating machines on a regular basis to ensure their efficient use, ii) shut down or turn off electrical and/or fuel (energy) based operations whenever possible, iii) restrict working hours to daylight conditions, iv) ensure that most working spaces are illuminated by sunlight, v) equip light fittings with energy saving bulbs, vi) enclose office spaces to render air-conditioning more efficient, vii) Ensure that the LPG used on site does not surpass the 150kg storage threshold (it is actually brought on site according to demand, which is rather low).
- » AGV aims to reduce sound pollution coming from its daily operations through noise abatement measures when purchasing any new equipment.
- » The applicant will adhere to the local health and safety regulations and will ensure that employees will keep with all health and safety practices whilst carrying out work related to the activities of AGV. In order to promote awareness within its team, AGV will ensure that all employees will attend health and safety courses.

4.0 Responsibility of Environmental Objectives and Targets

It is the responsibility of the directors of AGV to ensure that the projected objectives are adhered to. These targets are to be reviewed and revised on an annual basis. Modifications from set objectives need to be flagged during the audit process with reasons pertaining to such modifications being made in writing.

5.0 Documentation

The aim of AGV is to extract the maximum resources out of the waste material delivered to its facilities both through collection operations and from deliveries by third parties. This can be achieved through adequate storage keeping in mind the waste hierarchy with special attention to waste minimization followed by re-use, recovery and recycling.

The following records shall be kept:

- » Maintenance records
- » Staff training
- » Incidents on site
- » Recording of environmental performance (fuel, water and electricity usage)
- » Complaints
- » Movements of waste on and/or off the site (including quantities, dates of delivery or dispatch and final destination)

Table 1 and Table 2 show how movements of waste are recorded.

[illegible]

Table 1: Template for Recording Export of Waste

Stock Taking		Quantities- Weight or Volumes					
Date	Destination	Waste Type	Waste Type	Waste Type	Waste Type	Waste Type	Waste Type
		EWC Code	EWC Code	EWC Code	EWC Code	EWC Code	EWC Code

Table 2: Template for Annual Stock Taking

Incident diary				
Date	Time	Location	Description of incident/near miss	Course of action

Table 3: Template for incident diary

6.0 Corrective Action

Should any irregularities in the specified requirements of the IPPC permit not be fulfilled and identified through the environmental audit process, the Technically Competent Management will be responsible to identify and implement appropriate corrective measures. The following procedure will be adhered to:

- » Identify the causes of irregularities
- » Maintain a register of third party complaints
- » Identify appropriate corrective actions
- » Plan and implement corrective actions
- » Monitor corrective actions to verify their effectiveness

Table 4 provides a template for recoding of corrective actions taken. Where irregularities are identified outside the audit process, the same procedure should be applied. The public authority should be informed on any irregularities and consulted on appropriate corrective actions prior to implementation.

Audited Area	Date of Audit
Description of Irregularity	
Corrective Action	Date of implementation
Corrective Verification	Date of verification

Table 4: Template for corrective action

7.0 Awareness and Training

Most of the employees at AGV are manual workers and the company is committed to adhere to high safety standards and minimise possibility of avoidable accidents. All employees shall be provided with adequate training and written operating instructions to enable them to effectively carry out their duties. Staff dealing with the batteries waste management activities is fully trained in battery handling and all relative records are maintained.

Moreover, they will be expected to attend health and safety courses by a professional training provider in order enhance their awareness on occupational health and safety issues and how they can tackle emergency situations.

The management staff shall strive to attend any available professional training courses or public information sessions on best practices in waste management, recycling and environmental permitting obligations.

Mr Frank Cachia, on his capacity as a director, will be the person responsible for the provision of training both from internal or external training providers. Table 5 provides a template for keeping training records.

Name of institution providing course	Title of course	Dates	Names of Employees attended

Table 5: Proposed template for keeping training records

8.0 Maintenance Programme

The management is committed to keep detailed maintenance records of all machinery found at the facility to ensure they are kept in a good operating condition and without causing potentially polluting leaks and spillages or excessive noise. Table 6 provides details of the maintenance programme while Table 7 shows a template form for keeping records of maintenance, which can be applied to any machinery.

The management also has put in place procedures for regular inspections and maintenance of storage areas and equipment to identify signs of damage, deterioration or leakage. This is performed on a daily basis by keeping records using the sheet shown in Table 7, once again.

Table 6: Maintenance programme

Check	Lubrication/ Greasing	Fluid Levels	Fuel	Gauges	Tyres
Fork lifts	Moving joints need to be greased to prevent the harmful effects of friction. Fittings need to be greased on a regular basis and worn out ball bearings need to be changed.	Transmission and hydraulic fluids, coolants as well as motor oil levels need to be checked regularly depending on how often fork lift is used. If necessary daily inspections should be carried out.	Fuel levels need to be checked on a daily basis. Changing LPG cylinders should follow appropriate procedure ensuring safety protocols are adhered to.	Gauges and lights found on the instrument panel of the forklift give an indication when some part is malfunctioning. Therefore, attention must be paid to these instruments and the appropriate measurements taken, when they indicate any faults. Doing so will forestall more expensive repairs.	Air pressure and tyre condition should be checked regularly to avoid unbalance which could lead to damaging of the goods being carried. Worn out tyres are to be replaced.
Pallet jacks	Lifting chains and inside of channels are to be cleaned periodically and lubricated lightly with	Hydraulic oil levels need to be checked with the fork in lowered	Battery is to be charged accordingly depending on use.	N/A	Air pressure and tyre condition should be checked regularly to avoid

	light oil every 6 months.	position every 3 months.	The battery should be kept fully charged.		unbalance which could lead to damaging of the goods being carried. Worn out tyres are to be replaced.
--	---------------------------	--------------------------	---	--	---

Table 7: Template for keeping records of maintenance

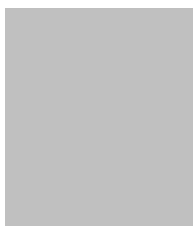
MAINTENANCE RECORD	
Equipment/ Machinery	
Date	
Technician	
Maintenance work description	
Comments	

Appendix 1

CV of Mr Frank Cachia

PERSONAL INFORMATION

FRANK CACHIA



 DIELJA, TRIQ LUNZJATA, SAN GWANN, MALTA

 +356 99846461

 frankcachia@gmail.com



Sex MALE | Date of birth 06/08/1970 | Nationality MALTESE

WORK EXPERIENCE

AGV GROUP MALTA – Sole Shareholder & Sole Director – 1987 to date

Sole Shareholder & Sole Director – AGV NON FERROUS MALTA LTD (Waste Management)

Sole Shareholder & Sole Director – FOREST GREEN LTD (Property Development)

Sole Shareholder & Sole Director – MALTA FOOTBALL ACADEMY (Sports Related)

Shareholder & Director – MALTA SHOOTING ACADEMY (Sports Related)

Sole Shareholder & Sole Director – SPORTS INFRASTRUCTURE LTD (Sports Infrastructure & Turnkey Projects)

Main Shareholder – Marsaxlokk Football Club Commercialisation (President of Marsaxlokk Football Club)

EDUCATION AND TRAINING

EDUCATION – Stella Maris College, Gzira

University of Portsmouth – Accessibility Audit

University of Malta – Bachelor of Commerce

Mother tongue(s) Maltese

Other language(s)

	UNDERSTANDING		SPEAKING		WRITING
	Listening	Reading	Spoken interaction	Spoken production	
English	A	A	A	A	B

Italian

B	B	B	B	C

Organisational / managerial skills

Leading projects of my companies with my employees

Job-related skills

▪ All companies fall under AGV Group Malta and Customer Service is companies main objective

Digital skills

SELF-ASSESSMENT				
Information processing	Communication	Content creation	Safety	Problem solving
B	C	A	B	A

Other skills

Replace with other relevant skills not already mentioned. Specify in what context they were acquired.
Example:

▪ carpentry

Driving licence

B

ADDITIONAL INFORMATION

Publications

Accessibility Audit – 1st Publication 1999

8.0 Email Correspondence: Technical Training

Sian Pledger

To: Yasmin Schembri
Subject: RE: Waste Collection and Transportation of Waste Course at MCAST

From: **Galea Dorianne at ERA** <dorianne.b.galea@era.org.mt>
Date: Thu, Apr 11, 2019 at 1:59 PM
Subject: RE: Waste Collection and Transportation of Waste Course at MCAST
To: Frank Cachia <frankcachia@gmail.com>

Noted with thanks

Dorianne Galea
Senior Administrative Assistant | CEO/Director's Office



Environment & Resources Authority
Hexagon House, Spencer Hill, Marsa, MRS 1441, Malta.
T | +356 22923528 W | era.org.mt

SAVE PAPER Think before you print this email.

From: Frank Cachia <frankcachia@gmail.com>
Sent: Thursday, 11 April 2019 13:37
To: Galea Dorianne at ERA <dorianne.b.galea@era.org.mt>
Subject: Fwd: Waste Collection and Transportation of Waste Course at MCAST

Dear Dorianne,

Kindly note that I have submitted my application as below stated email.

Regards

Frank Cachia

----- Forwarded message -----

From: **Short Courses** <shortcourses@mcast.edu.mt>
Date: Tue, Apr 9, 2019 at 4:20 PM

Subject: RE: Waste Collection and Transportation of Waste Course at MCAST
To: Frank Cachia <frankcachia@gmail.com>

Good afternoon,

Noted.

regards

Stefania Grogan

Clerk

MG2I Part-Time Courses Office

Main Campus, Student House 1st Floor

Corradino Hill | Paola PLA9032 | Malta

Monday to Friday 09:00 - 12:30, 13:30 - 16:00

tel. +356 2398 7116/7777



From: Frank Cachia [mailto:frankcachia@gmail.com]

Sent: 09 April 2019 11:47

To: Short Courses

Subject: Re: Waste Collection and Transportation of Waste Course at MCAST

Kindly find attached,

Tomorrow by hand you will have application and payment

Regards

Frank

On Fri, Mar 22, 2019 at 2:35 PM Short Courses <shortcourses@mcast.edu.mt> wrote:

Good afternoon,

Kindly note that in order to apply you can fill in the attached form and visit our offices with **Form, ID, ERA letter and payment of 125eur**. Date and schedule is established according to number of applications. We cannot confirm dates as from now.

Opening Hours as per below. **For this week only we are also open between 4:30pm till 7:00pm.**

MG2I Part-Time Courses Office

Main Campus, Student House 1st Floor

Corradino Hill | Paola PLA9032 | Malta

Monday to Friday 09:00 - 12:30, 13:30 - 16:00

tel. +356 2398 7116/7777

Note the below details regarding the course:

MG2I-C0429 Waste Collection and Transportation of Waste (NEW)

The course covers the following objectives:

1. Environmental Impact of Waste Management.
2. Identify types of waste and arising in the Maltese Islands and relevant stakeholders.
3. Regulatory Policy and Legislation.
4. Understanding the principles and procedures for waste transfer activities.
5. Health and Safety in the collection and handling of waste.
6. Understand ways of mitigating potential impacts during the collection and transport of waste.

No pre-requisites and/or entry requirements are required.

An MCAST Certificate of Attendance will be issued to all students attending more than 80% of lectures.

Regards

Stefania Grogan

Clerk

MG2I Part-Time Courses Office

Main Campus, Student House 1st Floor

Corradino Hill | Paola PLA9032 | Malta

Monday to Friday 09:00 - 12:30, 13:30 - 16:00

tel. +356 2398 7116/7777



From: Frank Cachia [mailto:frankcachia@gmail.com]

Sent: 22 March 2019 12:48

To: Short Courses

Cc: Galea Dorianne at ERA

Subject: Re: Waste Collection and Transportation of Waste Course at MCAST

To Whom it may concern,

Further to below email, kindly note that I want to apply for below course.

Details: Frank Cachia

ID Card No: 415770M

Regards

Frank

On Wed, Mar 20, 2019 at 6:11 PM Galea Dorianne at ERA <dorianne.b.galea@era.org.mt> wrote:

Dear Mr Cachia,

Please find below the details regarding the course as requested:

MG2I-C0429 Waste Collection and Transportation of Waste (NEW)

The course covers the following objectives:

1. Environmental Impact of Waste Management.
2. Identify types of waste and arising in the Maltese Islands and relevant stakeholders.
3. Regulatory Policy and Legislation.
4. Understanding the principles and procedures for waste transfer activities.
5. Health and Safety in the collection and handling of waste.
6. Understand ways of mitigating potential impacts during the collection and transport of waste.

No pre-requisites and/or entry requirements are required.

An MCAST Certificate of Attendance will be issued to all students attending more than 80% of lectures.

For further information please contact MCAST on 23987777, shortcourses@mcast.edu.mt or visit their offices at Kordin.

Regards,

Dorianne Galea
Senior Administrative Assistant | CEO/Director's Office



Environment & Resources Authority
Hexagon House, Spencer Hill, Marsa, MRS 1441, Malta.
T | +356 22923528 W | era.org.mt

SAVE PAPER Think before you print this email.

9.0 Bunding Certification



LIP BUND EFFECTIVENESS AND CAPACITY CERTIFICATION
ERA General Binding Rules No.11

Cert # 19-09-078-A1

Page 1 of 3

General info	
RESPONSIBLE PERSON (OR OWNER) OF PREMISES ADDRESS	Mr. Frank Cachia AGV Non Ferrous Malta Ltd. 14, Brared Street, Birkirkara, BKR 1251, Malta
STORAGE AND LOW RIM/ LIP BUND LOCATION	The Low Rim/ Lip Bund is installed at -1, J&J Boatyard and Warehousing, Ta' Ghadajma I/o Mqabba.
LOW RIM/ LIP BUND MATERIAL AND INSTALLATION	<p>Lip Bunds have been installed along the whole width of the above mentioned Garage i.e. from wall to wall of both LHS and RHS Garage.</p> <p>The Lip Bund is made up of Floor Bolted Type Rubber Pre- Fabricated Sections. After the installation, the spaces in-between the individual Rubber Sections and spaces in-between the Rubber Sections and the Flooring have been sealed off using an appropriate sealant.</p> <p>The installation of this Lip Bund and the sealing of voids have been conducted in a workmanlike manner. During the inspection one could see No Signs of deterioration, in the bund.</p>
GARAGE SIZE	The AGV Non Ferrous Malta Ltd. premise has a LHS Garage interconnected to a RHS Garage. The RHS Garage (1) has an internal area of 229m ² whilst the LHS Garage (2) has an internal area of 195m ² .
LOW RIM/ LIP BUND DIMENSION	The Lip Bunds are 50mm high, 400mm wide and 8.0m long. Each Floor Bolted Rubber Pre-Fabricated Section is 500mm long.
BUND CAPACITY	Bund has a Volumetric capacity of 21,200Liters or 21.2 m ³ .

a: Specserv Ltd., 83, Lanzon Street, Tarxien, TXN 1811, Malta

m: (+356) 7982 6773 / (+356) 9989 2212 e: info@specservmalta.com

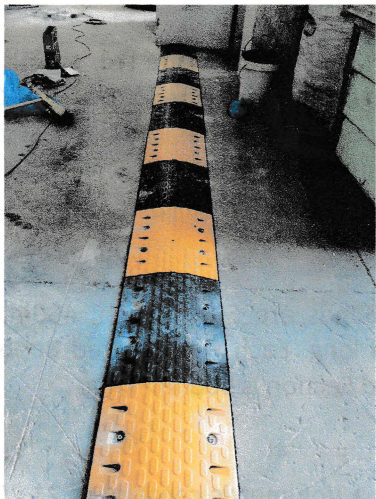
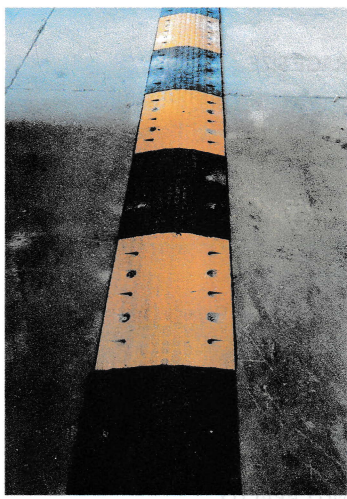
LIP BUND EFFECTIVENESS AND CAPACITY CERTIFICATION ERA General Binding Rules No.11

Cert # 19-09-078-A1

Page 2 of 3

<p>STORAGE CAPACITY AS PER GBR 11 ITEM 5.4</p>	<p>If One Chemical container is stored within the bund, this shall have a volumetric capacity of not more than 19,270Liters. If multiple containers are stored within the bund, the total volumetric capacity of the stored chemical containers within the bund shall not exceed 84,800Liters.</p> <p>All filling and off-take points are located within the bund. (ref. GBR 11 item 5.4)</p>
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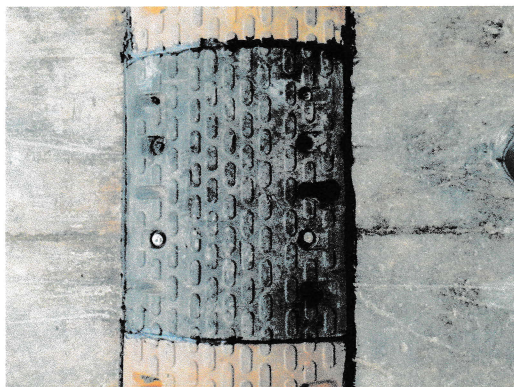
I CERTIFY THAT ON THE 10.11.2019 I HAVE INSPECTED THE ABOVE LOW RIM/ LIP BUND FOR EFFECTIVENESS AND CAPACITY AND THAT AS FAR AS ASCERTAINABLE THE ABOVE IS A TRUE REPORT OF THE RESULT.			
CERTIFICATE ISSUE DATE:	10.11.2019	NEXT INSPECTION DATE:	12 MTHS FROM INSP. DATE
ING. NOEL BONELLO B.ENG (HONS) WARRANT NO: 720		ING. NOEL BONELLO B.ENG (HONS) WARRANT NO: 720	
FOR OFFICE USE ONLY			

	
LOW RIM/ LIP BUND SECTION IN GARAGE 2	LOW RIM/ LIP BUND SECTION IN GARAGE 2

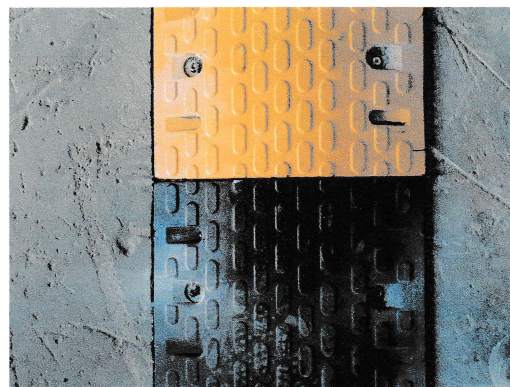
LIP BUND EFFECTIVENESS AND CAPACITY CERTIFICATION
ERA General Binding Rules No.11

Cert # 19-09-078-A1

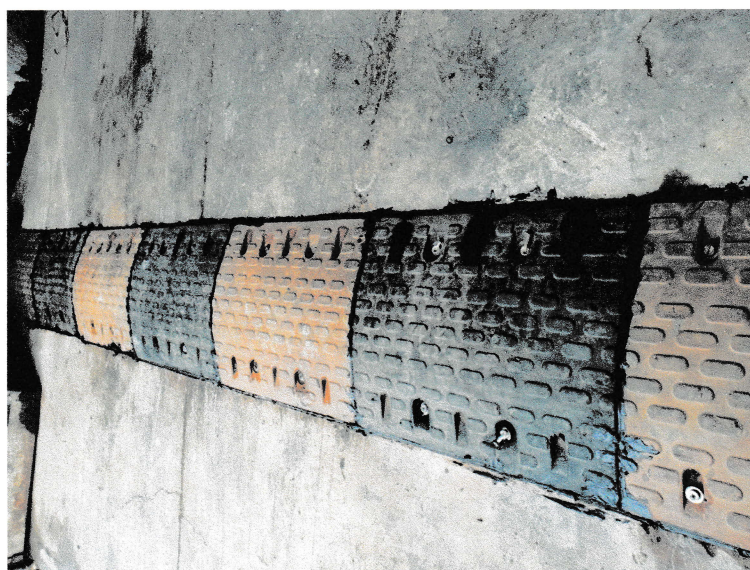
Page 3 of 3



LOW RIM/ LIP BUND SECTION IN GARAGE 1



LOW RIM/ LIP BUND SECTION IN GARAGE 2



LOW RIM/ LIP BUND FULL RUN SECTION IN GARAGE 1

10.0 Waste Tracking System

TRACKING SYSTEM AND INVENTORY

PRE-PROCESSING	
Date of Arrival	
Delivered By	
Waste Type	
EWC Code	
Hazardous (Yes/No)	
Weight	
Storage Location	
Associated Risks	
Accepted By	
Tracking Number	

PROCESSING	
Processing Description	
Processing location	
Associated Risks	

TRACKING SYSTEM AND INVENTORY

[illegible]

11.0 TCP Training Course Application

Sian Pledger

From: Frank Cachia <frankcachia@gmail.com>
Sent: Thursday, 7 November 2019 12:28
To: Sian Pledger; Sacha Dunlop
Subject: Fwd: Freom: Frank Cachia

Follow Up Flag: Follow up
Flag Status: Flagged

----- Forwarded message -----

From: **Frank Cachia** <frankcachia@gmail.com>
Date: Thu, Nov 7, 2019 at 12:26 PM
Subject: Freom: Frank Cachia
To: <kmais13@yahoo.com>

Dear Sir / Madame,

I am interested in applying for below mentioned course. PROFESSIONAL DRIVER / DANGEROUS GOODS VEHICLES

<https://www.transport.gov.mt/land/hire-and-reward-professional-driver/dangerous-goods-vehicles-780>

Kindly let me know how I can apply

--

Regards

Frank Cachia

--

Regards

Frank Cachia

12.0 Idriss Diankou CV

PERSONAL INFORMATION

Name: Idriss Diankou

Date of Birth: 01/01/1987

Nationality: Ivorian

Sex: Male

CONTACT DETAILS

Address: Room 1, 30 Triq Dun Filippu Borg, Birkirkara

Phone: 77785645

E-mail: frankcachia@gmail.com

WORK HISTORY

2012 to Present	AGV Non-Ferrous Malta Ltd.
	Waste Management Supervisor

EDUCATION

Completed secondary school education

13.0 Risk Assessment and Fire Plan



Environment Risk Assessment Report (incl Fire Plan)

AGV Non Ferrous Malta Limited
41, 42,
Site at Ta' Ghadajma
Limits of Mqabba
Malta



DISCLAIMER

This report is compiled in good faith and is based on the information provided by the owners/representatives of AGV Non Ferrous Malta Limited. The information in this report was obtained verbally, through the provision of sample documentation and observation. The assessors disassociate themselves from any known or concealed information which was not forwarded to their attention during the risk assessment.

In compiling this report the assessors have relied on the information provided for its accuracy and completeness in forming an opinion and have taken steps to verify it were possible.

This report gives an opinion in respect of certain potential risk exposures, the quality of the control measures in place and also makes recommendations for risk improvement. While implementing these recommendations will reduce the risk, an element of risk shall still remain and therefore other actions may still be necessary.



Contents

	Page
1.0 Introduction	5
2.0 Brief	5
3.0 Approach & Objectives	5
4.0 Conclusions & Recommendations	6
Appendix 1 - Assessment of the site	7
Appendix 2 - Fire Plan	11



File Reference E15-0009-AIS-C

Date of Report 10th June 2015

Manager Mr Frank Cachia
AGV Non Ferrous Malta Limited
41, 42,
Site at Ta' Ghadajma
Limits of Mqabba
Malta
Mobile: +356 9984 6461
E-Mail: frankcachia@gmail.com
Website: www.agvmalta.com

Report compiled by: Ing. Claude Farrugia - Director
B.Eng.(Mech) Hons, Eur.Ing., CMIOSH



1.0 Introduction

AGV Non Ferrous Malta Limited requested this office to carry out an environment risk assessment and prepare a fire plan taking into account the activities and substances handled at their facilities in Mqabba.

2.0 Brief

2.1 To carry out a risk assessment to identify, assess and minimise the environmental risks and hazards of accidents and their consequences occurring as a result of the operations and activities carried out by AGV Non Ferrous Malta Limited.

2.2 To prepare a fire plan, showing provision of fire extinguishing media, site access, etc.

3.0 Approach & Objectives

3.1 Environment Risk Assessment

The approach adopted to carry out the risk assessment consisted of the following:

Step	Activity	Objective
1.	Identify all the substances handled at the installation.	To determine EWC codes and establish between hazardous and nonhazardous.
2.	Identify activities which could give rise to potential contamination scenarios.	To determine the activities when the various substances are handled and establish potential contamination scenarios.
3.	For each substances and their corresponding potential contamination scenario, establish the consequences should no control measures be in place.	To determine the real extent of the effect of the waste substance on the environment.
4.	For each substances and their corresponding potential contamination scenario, establish the consequences with existing control measures be in place.	To determine the residual risk of the waste product on the environment with control measures in place.

The risk assessment is included in appendix 1.



3.2 Fire Plan

The undersigned carried out a survey of the premises to determine the existing arrangements to cater for an emergency situation such as a fire evolving on site. These were drawn on a plan clearly indicating the provisions in place and access to emergency vehicles. Due to the fact that no water reservoir is available within the warehouse complex of Ta' Ghadajma, provision of adequate water supplies in case of fire will be provided by road tankers coordinated by the Civil Protection Department. These are documented in appendix 2.

4.0 Conclusions

The effects on the environment from the wastes handled by AGV Non Ferrous Malta are considered to be minor in view of the following:

- a. For every potential source of contamination noted in the assessment, AGV Non Ferrous Malta Limited has taken precautionary measures to address same under normal operational conditions.
- b. All areas where batteries are handled are impervious in nature.
- c. Batteries are stored in approved fibre containers and stored in the upright position.
- d. Temporary storage of all wastes is indoors in secure warehouses.
- e. Spill kits are available in areas where batteries are handled.
- f. No surface drains are present in the immediate area.
- g. Premises are situated over third party warehouses, separated by approximately 0.35m of concrete.
- h. Limited volumes of batteries are stored at any one time, small enough to prevent uncontrolled inundation or percolation.
- i. There are no records of any accidental uncontrolled contamination on or from AGV Non Ferrous Malta Limited to the surrounding areas.
- j. In the event of a fire, adequate fire provision has been provided, including safe evacuation for personnel and access to fire fighting vehicles.



Appendix 1 – Risk Assessment

Possible contamination scenarios were assessed against the criteria noted in tables 1, 2 and 3.

Table 1 – Severity

Descriptor	Numeric Rating	Definition
Catastrophic	5	Very serious environmental effects with impairment of ecosystem function. Long term, widespread effects on significant environment.
Critical	4	Serious environmental effects with some impairment of ecosystem function. Relatively widespread medium-long term impacts.
Marginal	3	Moderate effects on biological or physical environment (e.g. air, water) but not affecting ecosystem function. Moderate short/medium-term widespread impacts (e.g. significant spills)
Negligible	2	Minor effects on biological or physical environment. Minor short/medium-term damage to small area of limited significance
Insignificant	1	No land and ground water environmental contamination by release. Limited damage to minimal area of low significance.

Table 2 – Probability

Descriptor	Rating	Definition	D Guideline frequency
Almost Certain	A	Consequence is expected to occur in most circumstances	Occurs more than once per month
Likely	B	Consequence will probably to occur in most circumstances	Occurs once every 1 month - 1 year
Occasionally	C	Consequence should occur at some time	Occurs once every 1 year - 10 years
Unlikely	D	Consequence could occur at some time	Occurs once every 10 years - 100 years
Rare	E	Consequence may only occur in exceptional circumstances	Occurs less than once every 100 years



Table 3 - Risk Matrix					
Likelihood	Consequence				
	1: Insignificant	2: Minor	3: Moderate	4: Major	5: Catastrophic
A: Almost Certain	Low	Moderate	Extreme	Extreme	Extreme
B: Likely		Moderate	High	Extreme	Extreme
C: Occasionally	Very Low	Moderate	High	High	Extreme
D: Unlikely	Very Low	Low	Moderate	High	High
E: Rare	Very Low	Very Low	Moderate	Moderate	High

The detailed risk assessment is presented in table 9, found overleaf.

No	Potential source of contaminant	EWC code (from LN 337 of 2001)	Activity	Contamination Scenario	Receptor (Land/Air/Groundwater)			Severity	Probability of contamination occurring	Risk Level without mitigation measures	Control measures in place to prevent contamination	Risk Level <u>with</u> mitigation measures
					Land	Air	Ground- water					
1	Paper and cardboard	15 01 01 Paper and cardboard packaging 19 12 01 Paper and cardboard	Collection / Transfer to waste facility	- Material left lying on the ground at client premises. - Fire	Yes	Yes	No	2	C	Very Low	- Visual inspection prior to leaving client premises. - Authorised vehicles used to carry waste by road. - Waste is secured in vehicles. - Fire extinguisher in vehicle.	Very Low
			Temporary storage	- Material exposed to the elements. - Fire	Yes	Yes	No	1	C	Very Low	- All waste is stored in a covered warehouse. - No smoking on the premises. - Fire extinguishers available.	Very Low
			Sorting and packaging	- Material exposed to the elements - Fire	Yes	Yes	No	1	C	Very Low	- Activity carried out in covered warehouse. - No smoking on the premises. - Fire extinguishers available.	Very Low
			Delivery	- Material exposed to the elements - Fire	Yes	Yes	No	1	C	Very Low	- Approved packaging in closed containers used to transport waste.	Very Low
2	Plastic and rubber	15 01 02 Plastic packaging 16 01 19 Plastic 17 02 03 Plastic 19 12 04 Plastic and rubber 20 01 39 Plastics	Collection / Transfer to waste facility	- Material left lying on the ground at client premises. - Fire	Yes	Yes	No	1	C	Very Low	- Visual inspection prior to leaving client premises. - Authorised vehicles used to carry waste by road. - Waste is secured in vehicles. - Fire extinguisher in vehicle.	Very Low
			Temporary storage	- Material exposed to the elements. - Fire	Yes	Yes	No	1	C	Very Low	- All waste is stored in a covered warehouse. - No smoking on the premises. - Fire extinguishers available.	Very Low
			Sorting and packaging	- Material exposed to the elements - Fire	Yes	Yes	No	1	C	Very Low	- Activity carried out in covered warehouse. - No smoking on the premises. - Fire extinguishers available.	Very Low
			Delivery	- Material exposed to the elements - Fire	Yes	Yes	No	1	C	Very Low	- Approved packaging in closed containers used to transport waste.	Very Low
3	Waste packaging	15 01 03 Wooden packaging 15 01 04 Metallic packaging 15 01 06 Mixed packaging 15 01 07 Glass packaging	Collection / Transfer to waste facility	- Material left lying on the ground at client premises. - Fire	Yes	Yes	No	1	C	Very Low	- Visual inspection prior to leaving client premises. - Authorised vehicles used to carry waste by road. - Waste is secured in vehicles. - Fire extinguisher in vehicle.	Very Low
			Temporary storage	- Material exposed to the elements. - Fire	Yes	Yes	No	1	C	Very Low	- All waste is stored in a covered warehouse. - No smoking on the premises. - Fire extinguishers available.	Very Low
			Sorting and packaging	- Material exposed to the elements - Fire	Yes	Yes	No	1	C	Very Low	- Activity carried out in covered warehouse. - No smoking on the premises. - Fire extinguishers available.	Very Low
			Delivery	- Material exposed to the elements - Fire	Yes	Yes	No	1	C	Very Low	- Approved packaging in closed containers used to transport waste.	Very Low

No	Potential source of contaminant	EWC code (from LN 337 of 2001)	Activity	Contamination Scenario	Receptor (Land/Air/Groundwater)			Severity	Probability of contamination	Risk Level <u>without</u>	Control measures in place to prevent contamination	Risk Level <u>with</u> mitigation measures
4	Ferrous and non-ferrous metals	16 01 17 Ferrous Metal 16 01 18 Non-Ferrous Metal 17 04 01 Copper, bronze, brass 17 04 02 Aluminium 17 04 03 Lead 17 04 04 Zinc 17 04 05 Iron and Steel 17 04 07 Mixed metals 17 04 11 Cables other than those mentioned in 17 04 10* 19 10 02 Non-ferrous waste 19 12 02 Ferrous Metal 19 12 03 Non-Ferrous Metal 20 01 40 Metals	Collection / Transfer to waste facility	Material left lying on the ground at client premises	Yes	No	No	1	C	Very Low	- Visual inspection prior to leaving client premises. - Authorised vehicles used to carry waste by road. - Waste is secured in vehicles.	Very Low
			Temporary storage	Material exposed to the elements	Yes	No	No	1	C	Very Low	- All waste is stored in a covered warehouse.	Very Low
			Sorting and packaging	Material exposed to the elements	Yes	No	No	1	C	Very Low	- Activity carried out in covered warehouse.	Very Low
			Delivery	Material exposed to the elements	Yes	No	No	1	C	Very Low	- Approved packaging in closed containers used to transport waste.	Very Low
5	Batteries and accumulators	16 06 01* Lead batteries 16 06 02* Ni-Cd batteries 16 06 03* Mercury-containing batteries 16 06 04 Alkaline batteries (except 16 06 03*) 16 06 05 Other batteries and accumulators 16 06 06* Separately collected electrolyte from batteries and accumulators	Collection	- Spillage of acid due to malhandling, poor containment during transit, damaged containers. - Fire	Yes	Yes	Yes	2	B	Low	- Batteries are collected in approved fibre containers and held in the upright position. - Authorised vehicles used to carry waste by road. - Waste is secured in vehicles. - Fire extinguisher in vehicle.	Low
			Temporary storage	- Spillage of acid due to malhandling and/or use of damaged containers. - Fire	Yes	Yes	Yes	1	C	Very Low	- Batteries are stored in approved fibre containers and stored in the upright position. - Storage is inside a covered warehouses; no contact with wet weather. - Sorting is carried out over impervious surface. - No surface drains in the immediate area. - Premises are situated over third party warehouses. - Personnel operating fork lift trucks and pallet jacks are competent.	Very Low
			Sorting and packaging	- Spillage of acid due to malhandling, failure of lifting equipment resulting in batteries falling to the ground, damaged containers, etc. - Fire	Yes	Yes	Yes	1	C	Very Low	- Spill kits readily available. - Limited volumes of batteries stored at any one time, small enough to prevent uncontrolled inundation or percolation. - Storage periods of materials is time-bound. - The chemical composition complies with LN 139/2002. - No smoking policy. - Fire extinguishers on site.	Very Low
			Delivery	- Poor packaging. - Fire	Yes	Yes	Yes	4	C	High	- Approved packaging.	Moderate



Appendix 2 – Fire Plan





Emergency Response Plan

