
Annex I: Comments regarding the IPPC application (11/05/2015)

Form A

Section	Duly made?	Comments 21 November 2014	Applicant's response 27th February 2015	Authority's Comments 11th May 2015
A1.1	✓	Noted.		
A1.2	✓	Noted.		
A1.3	✓	Noted		
A1.4	✓	Please note that the waste management permit referred to in this section (WM 009/12) is expired. This should be replaced by WM 005/13.	Revised and changed to latest version WM 00002/14. Refer to revised Form	Noted.
A2.1	✓	Noted.		
A2.2	✓	Noted.		
A3.1	✓	Noted.		
A3.5	✓	Noted.		

Form B

Section	Duly made?	Comments 21 November 2014	Applicant's response 27th February 2015	Authority's Comments 11th May 2015
B1.1	✓	Please include any other activities on site (beyond temporary storage of hazardous waste pending export exceeding 50 tonnes capacity) which take place at the installation (e.g. processing of lead acid batteries)	The client does not perform any other activities on site.	Noted.

		Also, please note that the waste management permit referred to in this section (WM 009/12) is expired. This should be replaced by WM 005/13.	Noted and revised.	Noted.
B1.2	✓	The non-technical description should also have some brief explanation as to the non-hazardous waste aspect of the business	Noted and revised	Noted.
B1.3	✓	Noted.		
B1.4 B1.4.1	✗	<p>Noted. There are some typo errors related to referencing the location of the maps/layout plans and the heading in this section. Kindly adjust accordingly.</p> <p>This research will also need to be included as part of the Risk Assessment, on which the Authority will determine whether a Baseline Report in accordance with the Industrial Emissions Directive, would be required before starting operations on site.</p> <p>Official guidance from the European Commission on the preparation of the baseline report titled “European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions” can be found online on the Commission’s website.</p>	Risk Assessment compiled by Dr. Peplow in 2012 is being attached for your perusal as IPPC Form B Doc 2.8 (Appendix III).	<p>In lieu of a site report, reference here is being made to a risk assessment conducted for the treatment of batteries on site. The site report must contain a history of the site (including current and past uses) and describing the condition of the site of that part of the installation in respect of which you are applying for a permit, and, in particular, identifying any substance in, on or under the land which may constitute a land and groundwater pollution risk in relation to all of the activities being carried out on site.</p> <p>This Site Report will determine whether a Baseline Report in</p>

				<p>accordance with the Industrial Emissions Directive, would be required before starting operations on site.</p> <p>Official guidance from the European Commission on the preparation of the baseline report titled “European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions” can be found online on the Commission’s website.</p>
B1.4.2	✖	Noted		<p>Noted. It has been noted that Figure 2 in Section 3.2 only highlights one of the two garages used in these operations. Furthermore, Figure 3 does not highlight the permitted garages. Kindly update these plans.</p>
B1.4.3	✖	Noted		<p>Figure 4 still indicates battery dismantling operations. Please update accordingly.</p>
B2.1	✓	In Section 4.1 (Management and Reporting Structure) please note typos in references.	Revised.	Noted

	<p>In Section 4.2 (Environmental Policy), reference should also be made to the company's plans for review of environmental performance. Reference to the key legislation which should be adhered to during the company's operations should also be included here.</p>	Revised.	Noted
	<p>In Section 4.3 (Environmental Objectives and Targets) reference should be made to the company's plans for efficient use of resources (e.g. plans on how to reduce electricity used).</p>	Revised.	Kindly clarify whether there is any intention to store fuel or more than 150kgs of LPG on site, in which case the MRA will need to be contacted for a secondary storage permit. The above information is being requested by MRA in view of the fifth bullet point on pg 9 and the fourth bullet point on pg 10 of the IPPC Form B report
	<p>In Section 4.4 please note repeated title 'Environment Objectives and Targets'</p>	Revised.	
	<p>In Section 4.5 please note typos in references. Furthermore, whilst the proposed tables for recording waste movements have been noted, please ensure that records kept are compatible with the waste reporting templates for the waste streams handled by the facility, including</p>	<p>Templates for recording waste movements are compatible with the operator's current procedures.</p>	Noted. See comment above re: information request from MRA

		<p>the template for batteries and accumulators.</p> <p>In Section 4.6 please note typos in references; and in Section 4.8 please note repetition of title ‘Corrective Action’</p>	Revised.	Noted
<p>B2.2</p> <p>B2.2.1</p>	✖	<p>Further information is being requested as to what ‘processing’ of this material is to be carried out on the non-hazardous wastes on site; since the current facility permit only contemplates temporary storage of this material prior to export without any processing. Furthermore, the process flow diagram submitted in Section 5.3 of the Report does not show any further processing of materials on site.</p> <p>Further information is to be provided on the reception of the various types of batteries which arrive at the facility in skips through the batteries collection scheme (WM 005/13), namely further detail on the handling, sorting and packaging methods of batteries other than lead-acid batteries (i.e. batteries falling under 16 06 02*, 16 06 03*, 16 06 04 and 16 06 05) and any separately collected electrolyte (16 06 06*).</p> <p>With regards to the emptying of the lead-acid (wet cell) batteries, the description refers to “the removal of acid from the wet</p>	<p>Non-hazardous waste is not processed on-site; it is only prepared for export. Only baling and wrapping of waste streams take place in the facility prior to export.</p> <p>At the time being, batteries are sorted according to the following criteria: lead-acid, nickel-cadmium, mercury containing, alkaline, other batteries. Should any other kind of batteries be stored and packaged at the facility, these will be placed in leak proofed containers that are laid on top of plastic crate pallets</p> <p>No longer applicable</p>	<p>Kindly note that baling of waste constitutes processing of waste. The facility’s current environmental permit only contemplates receipt of ready baled waste for temporary storage prior to export. Further information on the receipt and baling of these wastes is required.</p> <p>Please include any information on storage/repackaging of separately collected electrolyte</p> <p>Noted.</p>

	<p>cell batteries requires that they are emptied from fluids on site in a safe procedure within enclosed units”. Kindly explain what is being referred to by ‘enclosed units’ – a more detailed description or photos of the above should be provided. A drawing of the above acid draining area and its related containment may also be useful. Further to this, reference is made to batteries being packaged “on 1000litre double density containers” – please clarify further and/or provide photographs of this as above.</p> <p>Reference is also made in this section to “transfer of acid to the plant” – please clarify whether you are referring to export of batteries, export of acid, or both.</p> <p>This section should be updated with the average capacity of a lead acid battery and the estimated quantities of acid (and wash water from rinsing of batteries) which is collected by the facility per year; as well as further detail on how this is treated/disposed of.</p> <p>In Section 5.1.1 (on page 20), the paragraph on ‘battery neutralisation machinery’ is unclear in the process steps. Kindly clarify.</p>	<p>No longer applicable</p> <p>No longer applicable</p> <p>No longer applicable</p>	<p>Noted.</p> <p>Please provide details of storage, treatment and disposal of separately collected electrolyte</p> <p>Noted.</p>
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B2.2.2	✘	This section should include a paragraph requesting how waste would be stored in temporary periods of shutdown. If during such periods waste is going to be stored in the same area as described in Section 5.1 of the IPPC Form B Report, you may wish to make reference to that section here.	Noted and revised.	The revision has not addressed our original comment dated 21 st November 2014. Further details on contingency during shutdown periods should be included. Kindly address.
B2.2.3	✓	Noted.		
B2.2.4	✘	<p>The table should clarify which BREF document is being referred to, in view of the fact that this will be reviewed by other consultees as well as being issued for public consultation. The BAT comparison section needs to look at the relevant BREF as a whole, and make adequate comparison. Where certain sections do not apply, you are required to include a justification as to why this is not applicable to your facility.</p> <p>In the case that entire sub-sections of the BREF do not apply, you may wish to include justification for the sub-section as a whole.</p>	<p>The BREF documents being reviewed are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Waste Treatments Industries <input type="checkbox"/> Emissions from storage <p>This appendix (Appendix IV) is not yet finalised, and only contains the Emissions from storage BREF document.</p>	The review on the Emission from Storage does not follow the guidelines provided in our comments on the 1 st review of 21 st November 2014. The BAT comparison section needs to look at the relevant BREF as a whole, and make adequate comparison. Where certain sections do not apply, you are required to include in the report, with a justification as to why this is not applicable to your facility. In the case that entire sub-sections of the BREF do not apply, you may wish to

				<p>include justification for the subsection as a whole.</p> <p>Furthermore, please note the following comments on what has been provided:</p> <p><u>A) Safety & Risk Management –</u> As explained in our comments on Section B1.4.1, this risk assessment needs updated.</p> <p><u>B) Training & Responsibility –</u> Noted</p> <p><u>C) Storage Area –</u> To confirm that the roof and ventilation of the building conform with the specifications given in Section 4.1.7.2. Should this not be the case, justification as to why an alternative design has been used.</p> <p><u>D) Separation & Segregation –</u> To confirm that a physical barrier exists (e.g. a brick wall) between the hazardous wastes and storage of potentially flammable wastes such as paper, cardboard and plastic.</p>
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		Further to this, reference is made to Sections 4.1.7.2, 4.1.7.3, 4.1.7.4 and 4.1.7.10 in this table, however such sections do not exist in the Waste Treatment BREF. Kindly clarify correct sections to which you are referring.	These sections have been deleted and the two BREF documents mentioned above are being addressed.	<p>E) <u>Containment of leakage and contaminated extinguishant</u> – To explain how these have been implemented on site.</p> <p>F) <u>Fire-Fighting Equipment</u> - To explain how these have been implemented on site.</p> <p>G) <u>Prevention Ignition</u> - To explain how these have been implemented on site.</p> <p>To update the BAT Comparison for the Emissions from Storage BREF as well as submitting BAT Comparison for the Waste Treatment Industry BREF.</p>
B2.2.5	✓	Noted		
B2.3	✓	Please update to include any raw materials used for packaging of the waste. Also, kindly update application form to refer to Section 5.6.	Pallets Plastic for shrink-wrapping	Noted.

		Also please note typo in references in this section.	Revised	Noted.
B2.4	✓	Noted.		
B2.5	✓	Noted. Please note that corresponding records of this maintenance will need to be kept by the company. This will be a condition in the IPPC permit. Also please note typo in reference in this section.	Noted. Revised	 Noted
B2.6 B2.6.1	✓	Noted		
B2.6.2	✓	Noted		
B2.7	✗	This section does not appear to take into consideration any water used for rinsing of wet cell batteries. Kindly include and update section.	No longer applicable	Noted
B2.8	✗	Reference in the application is given as “IPPC Form B Doc B2.8” however no such section could be traced. Kindly submit. Please note that the risk assessment is required in order to determine whether a baseline study will be needed.	Please find enclosed IPPC Form B Doc 2.8 (Appendix III) – Risk Assessment compiled by Dr. Peplow.	The risk assessment in this section should identify, assess and minimise the environmental risks and hazards of accidents and their consequences and include the various plans and certifications listed in the application form under this section. Furthermore, it is important that a fire plan is submitted, showing provision of adequate water supplies in case of

				<p>fire and that the site is accessible for fire response vehicles.</p> <p>A full list of what is required is listed in the application form under this section.</p>
B2.9	✓	Noted.		
B2.10	✓	Noted.		
B2.11	✓	Noted.		
B3.1.1, B3.1.2, B3.1.3	✓	<p>The maximum site capacity of several of the non-hazardous wastes to be handled on site was indicated as ‘not applicable’. Kindly revise and state the maximum capacity for each of these waste streams which could potentially be stored at any given time.</p> <p>Table 6 indicates the EWC code 15 01 06 (i.e. ‘Mixed Packaging’). Kindly confirm that this refers to such mixed packaging originating from commercial or industrial sources only (i.e. no domestic household collection).</p> <p>In the table related to ‘Batteries and Accumulators’, please note that the projected quantities of waste to be processed annually is given as 215 tonnes. Given that this does not reflect the quantities of batteries exported from the</p>	<p>Revised.</p> <p>Yes mixed packaging originating from commercial and industrial sources.</p> <p>Revised to 750 tonnes</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

		<p>installation from the beginning of 2014 to date, kindly indicate whether this is the correct figure or if the operator wishes to revise.</p> <p>Please see comments made previously in this document related to Sections B2.2 and B2.2.1</p> <p>Also please note typo in reference in this section.</p>	<p>Noted.</p> <p>Revised</p>	<p>Noted.</p> <p>Noted.</p>
B3.2	✓	Noted		
B3.3 B3.3.1	✓	Noted		
B3.3.2	✗	Reference in the application is given as “IPPC Form B Doc B3.3.2” however no such section could be traced. Kindly submit.	AGV has requested a copy of the certification of the cesspit that (shared at Ta Ghadajma complex), and is still waiting for a response	Please submit as soon as possible
B3.3.3	✓	Reference in the application is given as “IPPC Form B Doc B3.3.2” however no such section could be traced. Kindly submit.	AGV has in hand the receipt for the submission of the sewer discharge permit, which is being attached in Appendix V	Noted
B3.3.4	✓	The reply ‘Not Applicable’ has been noted.		
B3.4	✓	The reply ‘Not Applicable’ has been noted.		
B3.5	✓	Noted. However please note typo in reference in this section.	Revised	Noted

		Please note that harvested rain water and any second class water which may be proposed to be collected / stored should not to be used for human consumption and/or personal use. Water intended for human consumption and/or personal use should be potable, from an approved source and in accordance with the provisions of Water Intended for Human Consumption Regulations, 2009- L.N. 17 of 2009 as amended by L.N. 242 of 2009.	Noted	Noted
B3.6	✓	Noted		
B3.7	✗	Baled waste and acid tanks may be a source of odour. Kindly propose any mitigation measures to be adopted should the need arise.	No longer required	Noted.
B3.8	✓	Noted. Please note the application form makes reference to Section 11 rather than Section 12. Kindly adjust reference in form. Furthermore, please note typo in reference made in this section	Revised Revised	Noted Noted
B3.9	✓	Noted. Please note that the application form makes reference to Section 12 rather than Section 13. Kindly adjust reference in form.	Revised	The application form still makes reference to Section 12 in error. Kindly revise
B3.10	✗	Kindly include any monitoring requirements imposed by WSC in the sewer	Sewer discharge permit applied for by J.Micallef is not in hand yet.	Noted.

		discharge permit in view that floor washings with potential contamination may be discharged to the cesspit shared with other units in the warehouse complex. Kindly clarify whether WSC have requested the installation of a settling tank/inspection chamber prior to direct discharge to this cesspit. If this is not the case, kindly confirm the method of discharge of such floor washings. A floor drainage plan of the facility is also being requested.	A floor drainage plan is not available because the facility only utilizes one shower and one toilet.	Our query related to the confirmation on the current situation related to floor washings has not yet received a sufficient reply.
B3.11	✓	The submitted format is acceptable; however you are required to include the volumes in tonnes in the various cells where waste is described. As is requested in Section B 3.11, this information is to be extrapolated from previous sections describing waste.	Revised.	Noted.
B4.1	✗	A rationale as to why this does not apply to this site should be provided, ideally in conjunction with the information provided in previous sections related to the various potential emissions	In view of the fact that the activities undertaken in this installation include only temporary storage and no processing except for preparation for export, no environmental effects are envisaged.	Partly addressed. However, you may wish to replicate specific sections of the risk assessment to be provided for section 2.8 of the application form, (e.g. contingency against spillage of battery acid) to substantiate your argument.
B4.2	✗	A rationale as to why this does not apply to this site should be provided, ideally in conjunction with the information provided	In view of the fact that the activities undertaken in this installation include only temporary storage and no processing except for	Partly addressed. However, you may wish to replicate specific sections of the risk assessment to

		in Section 4.1	preparation for export, no environmental effects are envisaged.	be provided for section 2.8 of the application form, (e.g. contingency against fires) to substantiate your argument.
B5.1	✓	Noted.		
B6.1	✓	Noted.		
B6.2	✗	Please see feedback provided for Section 4.2	Noted.	This section will need to be revisited in conjunction with the findings of the risk assessment to be submitted as part of Section 2.8
B6.3	✓	Noted.		
B7.1	✓	Noted Reference in the application is given as “IPPC Form B Doc B7.1” however no such section could be traced. Kindly amend reference to Appendix II of Form A, where this development permission has already been submitted.	Enclosed (Appendix II – Form A)	Noted.
B8.1	✓	Reference in the application is given as “IPPC Form B Doc B8.1” however no such section could be traced. Kindly submit.	Enclosed (Appendix I)	Noted.
B8.2		Reference in the application is given as “IPPC Form B Doc B8.1” however no such section could be traced. Kindly submit.	Enclosed (Appendix I)	Noted.
B8.3	✓	Noted		
B9.1	✓	Noted. Please note the application form makes reference to Section 13 rather than Section 14. Kindly adjust reference in form.	Revised.	Noted.