
Annex I: Comments regarding the IPPC application (21/11/2014)

Form A

Section	Duly made?	Comments 21 November 2014
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.
A2.1	✓	Noted.
A2.2	✓	Noted.
A3.1	✓	Noted.
A3.5	✓	Noted.

Form B

Section	Duly made?	Comments 21 November 2014	Applicant's response
B1.1	✗	<p>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)</p> <p>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.</p>	

B1.2	✖	The non-technical description should also have some brief explanation as to the non-hazardous waste aspect of the business	
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 (Section B2.8), 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>	
B1.4.2	✓	Noted	
B1.4.3	✓	Noted	
B2.1	✖	<p>In Section 4.1 (Management and Reporting Structure) please note typos in references.</p> <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</p>	

		<p>adhered to during the company's operations should also be included here.</p> <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> <p>In Section 4.4 please note repeated title 'Environment Objectives and Targets'</p> <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 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>	
<p>B2.2</p> <p>B2.2.1</p>	<p>✖</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</p>	

	<p>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 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>Please note typo in references and two different sub-sections</p>	
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		bearing the same numbering (i.e. 5.1.1 is used to refer to sections on 'Transport of waste to the site' and 'Machinery')	
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.	
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>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.</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.	

		Also please note typo in references in this section.	
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.	
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.	
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.	
B2.9	✓	Noted.	
B2.10	✓	Noted.	
B2.11	✓	Noted.	
B3.1.1, B3.1.2, B3.1.3	✗	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. Table 6 indicates the EWC code 15 01 06 (i.e. ‘Mixed Packaging’). Kindly confirm that this refers to such mixed	

		<p>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 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>	
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.	
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.	
B3.3.4	✓	The reply ‘Not Applicable’ has been noted.	
B3.4	✓	The reply ‘Not Applicable’ has been noted.	
B3.5	✓	<p>Noted. However please note typo in reference in this section.</p> <p>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,</p>	

		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.	
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.	
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	
B3.9	✓	Noted. Please note that the application form makes reference to Section 12 rather than Section 13. Kindly adjust reference in form.	
B3.10	✗	Kindly include any monitoring requirements imposed by WSC in the sewer 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.	
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.	
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	
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 Section 4.1	
B5.1	✓	Noted.	
B6.1	✓	Noted.	
B6.2	✖	Please see feedback provided for Section 4.2	
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.	
B8.1	✖	Reference in the application is given as “IPPC Form B Doc B8.1” however no such section could be traced. Kindly submit.	
B8.2	✖	Reference in the application is given as “IPPC Form B Doc B8.1” however no such section could be traced. Kindly submit.	
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.	