

---

**Annex I:** Comments regarding the IPPC application (31/07/2015)

---

**Form A**

Section	Duly made?	Authority's Comments 11 <sup>th</sup> May 2015	Applicant's response 16 <sup>th</sup> June 2015	Authority's Comments 31 <sup>st</sup> July 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?	Authority's Comments 11 <sup>th</sup> May 2015	Applicant's response 16 <sup>th</sup> June 2015	Authority's Comments 31 <sup>st</sup> July 2015
B1.1	✓	Noted.		

		Noted.		
B1.2	✓	Noted.		
B1.3	✓	Noted.		
B1.4 B1.4.1	✓	<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 accordance with the Industrial Emissions Directive, would be required before starting operations on site.</p> <p>Official guidance from the</p>	<p>Site report following the Official guidance from the EC under Article 22(2) of Directive 2010/75/EU on industrial emissions has been compiled in Section 3.1</p>	Noted.

		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.		
B1.4.2	✓	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.	Amended as requested. Refer to new Figure 3	Noted.
B1.4.3	✓	Figure 4 still indicates battery dismantling operations. Please update accordingly.	Amended as requested.	Noted.
B2.1	✓	Noted  Noted  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 LPG stored on site is used for fork-lifting operations and does not surpass the 150kg storage threshold. LPG is purchased on a case-by-case basis depending on use.	Noted

		<p>the fifth bullet point on pg 9 and the fourth bullet point on pg 10 of the IPPC Form B report</p> <p>Noted. See comment above re: information request from MRA</p> <p>Noted</p>	<p>Note above comment</p>	<p>Noted.</p>
<p>B2.2 B2.2.1</p>	<p>✓</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>Baling procedures are not currently employed on site. Moreover, the client confirmed that no baling of waste is planned to occur on site in the future. Tables 6-10 in the report have been amended accordingly</p> <p>Separately collected electrolyte is not accepted at the facility any longer. EWC 16 06 06 in Table 8 has been deleted accordingly</p>	<p>Noted – Tables 5 and 6 in Section 5.1.2 refer to the material being stored as 'Loose material in designated area', however in the final consolidated application this should be updated to read 'ready baled material in designated area' as it is our understanding that this waste arrives on site from other facilities already baled and loose material of this nature would require further management procedures.</p> <p>Noted</p>

		<p>Noted.</p> <p>Noted.</p> <p>Please provide details of storage, treatment and disposal of separately collected electrolyte</p> <p>Noted.</p> <p>Noted.</p>	<p>Refer to comment above regarding separately collected electrolyte</p>	<p>Noted</p>
B2.2.2	✓	<p>The revision has not addressed our original comment dated 21<sup>st</sup> November 2014. Further details on contingency during shutdown periods should be included. Kindly address.</p>	<p>Waste acceptance is ceased during shutdown periods should maximum capacity be reached. Such an occurrence is very remote given that it makes financial sense to export waste at the earliest to make space for incoming waste.</p> <p>In view of the fact that a larger quantity of batteries could be stored during a shutdown period, frequent inspections are conducted to prevent uncontrolled</p>	<p>Noted.</p>

			<p>inundation or percolation due to potential leakages. Other precautionary measures to contain potential leakages include:</p> <p>a. Batteries are stored in approved fibre containers and stored in the upright position.</p> <p>b. All areas where batteries are handled are impervious in nature.</p> <p>c. Spill kits are available in areas where batteries are handled.</p> <p>d. No surface drains are present in the immediate area.</p> <p>e. Premises are situated over third party warehouses, separated by approximately 0.35m of concrete</p>	
B2.2.3	✓	Noted.		
B2.2.4	✓	The review on the Emission from Storage does not follow the guidelines provided in our comments on the 1 <sup>st</sup> review of 21 <sup>st</sup> November 2014. The BAT comparison section needs to look at	Noted. The BREF document for Waste Treatments Industries is not deemed to be applicable as none of the waste streams temporarily stored on-site will be treated, not even baled. The BREF Emissions from Storage has been addressed in Appendix IV.	Noted. With regards to training, please note that further training on handling of dangerous substances should be undertaken by the person who will be responsible for the site (i.e. Mr. Frank Cachia). This will be a

		<p>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 include justification for the sub-section as a whole.</p> <p>Furthermore, please note the following comments on what has been provided:</p> <p><u>A) Safety &amp; Risk Management</u> – As explained in our comments on Section B1.4.1, this risk assessment needs updated.</p> <p><u>B) Training &amp; 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>requirement in the Improvement Programme in the IPPC permit.</p>
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	---------------------------------------------------------------------

		<p>D) <u>Separation &amp; 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> <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	✓	Noted.		



B2.4	✓	Noted.		
B2.5	✓	Noted.		
B2.6 B2.6.1	✓	Noted		
B2.6.2	✓	Noted		
B2.7	✓	Noted		
B2.8	✓	<p>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 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>	Risk assessment report and fire plan were compiled by Ing. Claude Farrugia and attached in Appendix III	Noted
B2.9	✓	Noted.		
B2.10	✓	Noted.		
B2.11	✓	Noted.		
B3.1.1, B3.1.2, B3.1.3	✓	Noted.		

B3.2	✓	Noted		
B3.3	✓	Noted		
B3.3.1				
B3.3.2	✓	Please submit as soon as possible	The cesspit is not owned by the operator	Noted. The issue of cesspit regulation and registrations will be tackled through the separate environmental permit (GBR 2358/11) which is being processed for the entire warehouse complex
B3.3.3	✓	Noted		
B3.3.4	✓	The reply 'Not Applicable' has been noted.		
B3.4	✓	The reply 'Not Applicable' has been noted.		
B3.5	✓	Noted.		
B3.6	✓	Noted		
B3.7	✓	Noted		
B3.8	✓	Noted.		
B3.9	✓	Noted. Please note that the application form makes reference to Section 12 rather than Section 13. Kindly adjust reference in form.	Noted and revised	Noted.
B3.10	✓	Noted.  Our query related to the confirmation on the current situation	Revised in Section 7.3 (report)	Noted. Please ensure that the emergency shower located at the back of the battery storage area is to be designed in such a way that any nearby spills of acid cannot percolate

		related to floor washings has not yet received a sufficient reply.		<p>into the shower drain (e.g. installing a raised shower tray). Should this not be installed by the date of issue of the permit, this will be included in the Improvement Programme.</p> <p>The Improvement programme will also require the installation of a low ramp/bump at the entrances to the installation which will act as bunding in case of spillages.</p> <p>Further to the above, the permit will only allow sweeping to take place within the installation. No floor washing will be allowed.</p>
B3.11	✓	Noted		
B4.1	✓	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.		Noted.
B4.2	✓	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	Noted. Specific reasons to substantiate argument have been included	Noted.

		against fires) to substantiate your argument.		
B5.1	✓	Noted.		
B6.1	✓	Noted.		
B6.2	✓	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	Noted. The risk assessment (Appendix III) suggests that the emissions from the installation are well contained and are highly unlikely to influence other sites	Noted.
B6.3	✓	Noted.		
B7.1	✓	Noted.		
B8.1	✓	Noted.		
B8.2	✓	Noted.		
B8.3	✓	Noted.		
B9.1	✓	Noted.		