

Annex II

Data Protection Clause

In terms of the Data Protection Act (Chapter 440 of the Laws of Malta), we will process any personal and/ or sensitive data supplied on/ in this submission or subsequently supplied by yourself, whether orally or in writing, for all or any of the following purposes:

1. The proper processing of your submission;
2. internal management, research and statistics;
3. the protection and promotion of our legitimate interests and the proper conduct of our obligations arising under any law or statutory instrument; and
4. to make public the necessary information as specified in the relevant law and/or instrument.

Relevant data will be disclosed or shared as appropriate with all our employees and with other third parties if pertinent to any of the purposes listed above.

You have the right to require that we provide you with access to your **personal data** as well as the right to rectify, or, in appropriate circumstances, erase/edit any inaccurate, incomplete or immaterial personal data which is being processed. However, you are required to inform us immediately of any alterations relating to your personal data which we are processing.

By sending your submission, you confirm that you are giving your explicit consent, in terms of the Data Protection Act, on behalf of yourself and all the other persons specified in this submission for the Authority to process your respective personal information as outlined above and you confirm that you have brought this Data Protection notice to the attention of these other persons and obtained their respective consents.

We undertake to implement appropriate measures and safeguards for the purpose of protecting the confidentiality, integrity and availability of all personal data processed.

I confirm that I have read and understood the above data protection clause.

Amino Chemicals: IPPC Application

Name _____

Signature _____

_____ Date

Annex II

Comments

General comments –

Kindly fill in the proper application forms.

Part A

Section	Comments	Duly made
	The general IPPC application Part A has to be filled in separately from the original application.	<i>Annex G includes our Application Part A duly completed.</i>
A1.1	OK. Kindly note that it is an IPPC application and not IPCC. Kindly amend,	<i>Amended as indicated.</i>
A1.2	OK.	✓
A1.3	Ok.	✓
A1.4	Kindly list the PA application for the extension.	<i>The PA numbers are as follows: PA 5423/06 and PA 01051/07</i>
A2.1	Ok	✓
A2.2	Ok	✓
A2.3	Ok	✓

Part B

Section	Comments	Duly made
	The general IPPC application Part B has to be filled in separately from the original application.	<i>Annex G includes our Application Part B duly completed</i>
B1.1	OK.	✓
B1.2	Please tick proper box in application.	✓
B1.3	The document found in 102 is not the site report but Schedule 6: The Maintenance and redecoration schedule. Kindly replace documents	<i>Amended as indicated.</i>
B2.1	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.2	Ok. Kindly provide the quantities that will be present at the warehouse at any one time, and the total amounts used per year.	<i>At any one time we shall have the following chemicals on site: Solvents in underground tanks: 85000kg Solvent in drums above ground:</i>

		<p>20000kg Miscellaneous chemicals: 10000kg</p> <p><i>The throughput for one year is estimated as follows:</i> Solvents in underground tanks: 150000kg Solvent in drums above ground: 40000kg Miscellaneous chemicals: 20000kg</p>
B2.3	<p>Attachment 104</p> <ol style="list-style-type: none"> 1. Kindly give provide an English translation of all the labels in the Italian language found in the diagram showing level 0. 2. Kindly describe in detail the European norms that the site will be constructed to. 3. Kindly provide a diagram showing the drains of the warehouse leading to a catchment area (if any), with a detailed explanation of where the drains lead to and the bunding that will be in place, and what is the capacity of the catchment area (if any). 4. Kindly explain what each tank will consist of. 	<p>✓</p> <p><i>The English translation has been provided electronically with this response.</i></p> <p><i>The Italian design company has completed a number of these plants and uses the latest EU guidelines for such work. We include in Annex H a declaration regarding BAT.</i></p> <p><i>The drains of the new warehouse can be seen in the drawing shown in (1) above. The encatchment area has a volume of 9 cu.mtrs, and includes a pump set for transfer of liquids accordingly.</i></p> <p><i>Two underground tanks will store methanol, and tetrahydrofuran each, whilst one tank for each of the following: toluene, sec-butanol, isopropanol.</i></p> <p><i>Another two underground tanks will handle waste for incineration purposes.</i></p> <p><i>The underground tanks at A61 will be used to store recycled products collected from the proposed recycling plant and fresh solvent materials for production</i></p>

	Attachment 105	<p><i>purposes.</i></p> <p><i>Please see Annex I</i></p>
	<ol style="list-style-type: none"> 1. Kindly give more details on the recovery system being proposed eg. what will it consist of, with reference to the diagrams already submitted, will it be connected to a scrubber? 2. Kindly note that two plans related to the alterations at A50 factory are put in the wrong folder. They are to be under attachment 104. Kindly take note of this when preparing the consolidated version for the public consultation. 	
B2.4	<ol style="list-style-type: none"> 1. Kindly provide quantities of waste that will be exported once the waste recovery unit is in place. 2. Kindly provide quantities of waste that will be recovered by the waste recovery unit. 3. The diagram indicates a pipeline connection between A61 and A50. Kindly describe the type of pipeline connections, and all the precautions taken so as to detect any potential leakages. 	<p><i>Approximately 280 MT</i></p> <p><i>Approximately 420MT</i></p> <p><i>The pipelines will be fully welded construction, tested hydraulically before put in use. Materials will be high grade stainless steels, PN16 rated with PTFE gaskets where necessary. The pipelines will lie in a concrete lined trench, linking the two factories. The respective pipes will be emptied of liquid materials when transfer is not taking place, hence reducing the risks considerably. Usage of the pipelines is anticipated to be 2 hrs per day. Visual inspection points will be available along the route.</i></p>
B2.4.1	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.5	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.5.1	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.6	Kindly provide more details on the waste recovery unit as per question B2.3, Attachment 105, (1).	<i>Please see Annex I</i>

	<p>Attachment 105</p> <ol style="list-style-type: none"> 1. Kindly give more details on the recovery system being proposed eg. what will it consist of, with reference to the diagrams already submitted, will it be connected to a scrubber? 2. Kindly note that two plans related to the alterations at A50 factory are put in the wrong folder. They are to be under attachment 104. Kindly take note of this when preparing the consolidated version for the public consultation. 	<p><i>purposes.</i></p> <p><i>Please see Annex I</i></p>
B2.4	<ol style="list-style-type: none"> 1. Kindly provide quantities of waste that will be exported once the waste recovery unit is in place. 2. Kindly provide quantities of waste that will be recovered by the waste recovery unit. 3. The diagram indicates a pipeline connection between A61 and A50. Kindly describe the type of pipeline connections, and all the precautions taken so as to detect any potential leakages. 	<p><i>Approximately 280 MT</i></p> <p><i>Approximately 420MT</i></p> <p><i>The pipelines will be fully welded construction, tested hydraulically before put in use. Materials will be high grade stainless steels, PN16 rated with PTFE gaskets where necessary. The pipelines will lie in a concrete lined trench, linking the two factories. The respective pipes will be emptied of liquid materials when transfer is not taking place, hence reducing the risks considerably. Usage of the pipelines is anticipated to be 2 hrs per day. Visual inspection points will be available along the route.</i></p>
B2.4.1	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.5	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.5.1	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.6	Kindly provide more details on the waste recovery unit as per question B2.3, Attachment 105, (1).	<i>Please see Annex I</i>

B2.7.1	Kindly provide the anticipated energy consumption of the waste recovery unit, and thus, by how much would the overall consumption would increase, once the waste recovery unit becomes operational.	<i>The only energy consumption device of the waste recovery system will be a set of electric pumps (30kW + 15kW) and steam supply to heat the process liquids (150 to 800 kg/hr at 3 barg). We shall also consume chilled water (60cu.mtrs per hr). A detailed account of the energy consumption can only be available after detailed engineering has been carried out, which has not yet been done due to the pending development of the project. We anticipate 1.0% increase in total energy used, but this being subject to further study.</i>
B2.7.2	What steps are being taken in the design phase of the waste recovery unit so as to improve energy efficiency?	<i>The company is purchasing standard equipment and since this is private enterprise, we anticipate that the designers have indulged in using the most economic systems available, but details are pending since the approval of the project is still pending.</i>
B2.8	<p>1. Kindly note that SOPs need to be amended to include any risks from the waste recovery unit, and the warehouse.</p> <p>2. Kindly describe the 'latest technological designs and EU standards' mentioned in your submission.</p>	<p><i>These will be updated accordingly. We include Annex H, which is an SOP for the handling of raw materials currently being used at our plant</i></p> <p><i>The Italian design company has completed a number of these plants and uses the latest EU guidelines for such work. We include in Annex H a declaration regarding BAT by the same designers.</i></p>
B2.9	Is an increase in noise and vibration levels anticipated from the use of the waste recovery unit, at A61?	<i>No these are not anticipated</i>
B2.10	Kindly give details how the VOCs likely to be emitted from the waste recovery unit, are going to be monitored or else recorded.	<i>The waste recovery unit vents will be directed to the existing scrubbers. The same procedure for VOC's at the scrubber exit will be</i>

		<i>used.</i>
B2.11	Ok. Comments made by IPPC Committee regarding previous application still need to be answered.	<i>Completed as per meeting dated 21.08.2007</i>
B2.12	Ok	✓
B3	OK. Kindly specify the nature, sources or emissions that will arise from the Waste Recovery Unit and from the warehouse.	<p><i>We do not anticipate emissions from the warehouse, due to its nature of application. Any gaseous fumes released during tank loading will be captured in the supply iso-tanks supplying the material for discharge. Any liquid leakages will be captured and transferred to the waste tanks for incineration. Liquid wastes from the Waste recovery Unit will be collected for incineration, gaseous wastes being sent to the existing scrubber accordingly. The pure solvent recovered will be piped back to the underground storage tanks at MRA 061.</i></p> <p><i>We would also like to mention that all our bulk storage materials are kept in an inert atmosphere, namely suppressed by nitrogen gas, for safety purposes. When deliveries of fresh solvents are pumped into our storage tanks, the nitrogen gas inside our storage vessels goes into the supply tanker along with any vapors being produced. These nitrogen / solvent vapors are then sent back to the supply company, hence we do not emit any solvent vapors into the atmosphere from our bulk filling operations.</i></p>
B4.1	Will the emissions estimated in B3 above, increase significantly the overall emissions of the whole installation, thus leading to having a significant effect on neighbouring sites?	<i>The gaseous emissions will slightly increase due to the nature of the process, but the overall effect is that waste recovery will be significant and more beneficial to the environment. We do not anticipate any significant effects on neighbouring sites due to the position of the factory.</i>

		<i>We are confident that the currently installed scrubber capacity is sufficient to include the recycling plant since the sizing of the units is such as to accommodate all our production plant running simultaneously, but this cannot be possible due to other operational constraints. Hence capacity exists for the recycling plant.</i>
B4.2	Please refer to B4.1 above.	✓
B5.1	Does the proposed extension require an EIA?	<i>The permit is being determined and is awaiting to be reviewed by the MEPA Board and as such to date it was found that an EIA was not necessary.</i>
B6.1	Ok	✓
B6.2	Ok	✓
B6.3	Ok	✓
B7.1	Ok	✓
B7.2-8	Ok	✓