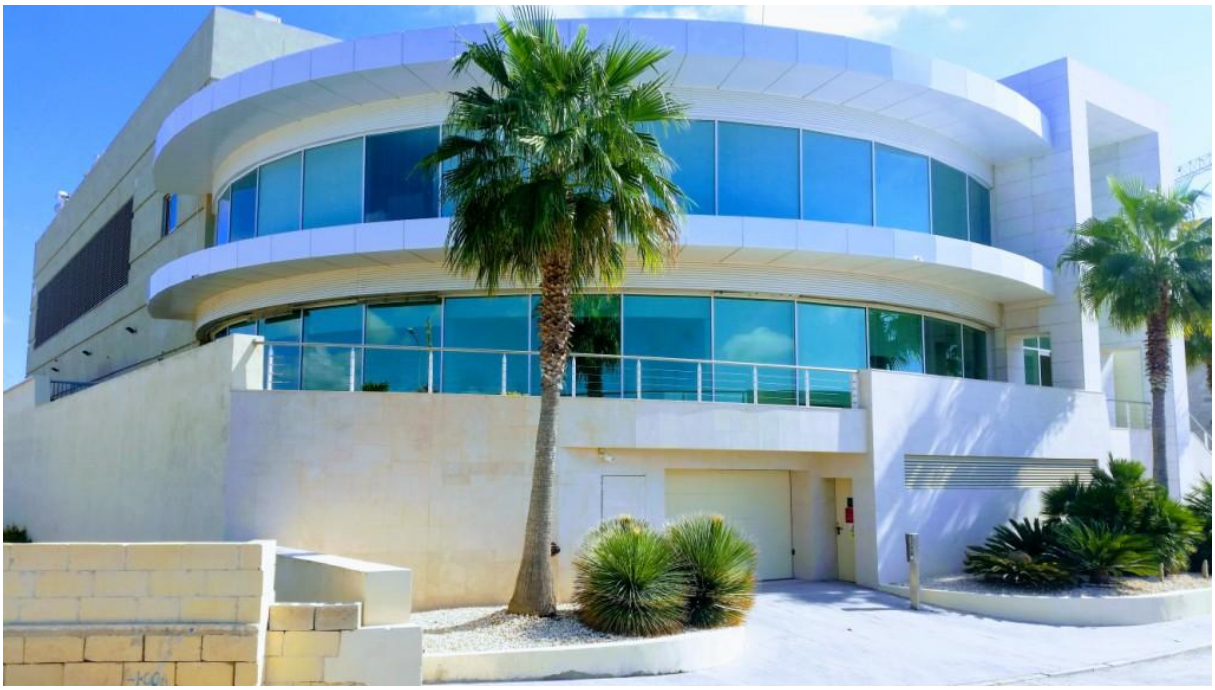
en-sure monitoring

IP 0001/19

STERLING CHEMICAL MALTA LTD, HAL FAR

APPLICATION FOR VARIATION AND RENEWAL OF IPPC PERMIT
VOLUME 4: RESPONSE TO FEEDBACK ON IPPC APPLICATION



Version 2: July 2019

Report Reference:

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Quality Assurance

Sterling Chemical Malta Ltd, Hal Far
Application for Variation and Renewal of IPPC Permit: Volume 4
July 2019

Report for: Sterling Chemical Malta Ltd

Revision Schedule

Rev	Date	Details	Prepared by	Reviewed by	Approved by
00	Jun. 2019	Submission to client	**Rachel Decelis** Senior Consultant	**Rachel Xuereb** Director	**Adrian Mallia** Managing Director
01	Jul. 2019	Submission to ERA	**Rachel Decelis** Senior Consultant	**Rachel Xuereb** Director	**Adrian Mallia** Managing Director

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ATTACHMENTS

RESPONSE TO FEEDBACK ON IPPC APPLICATION

Feedback from ERA

Form A

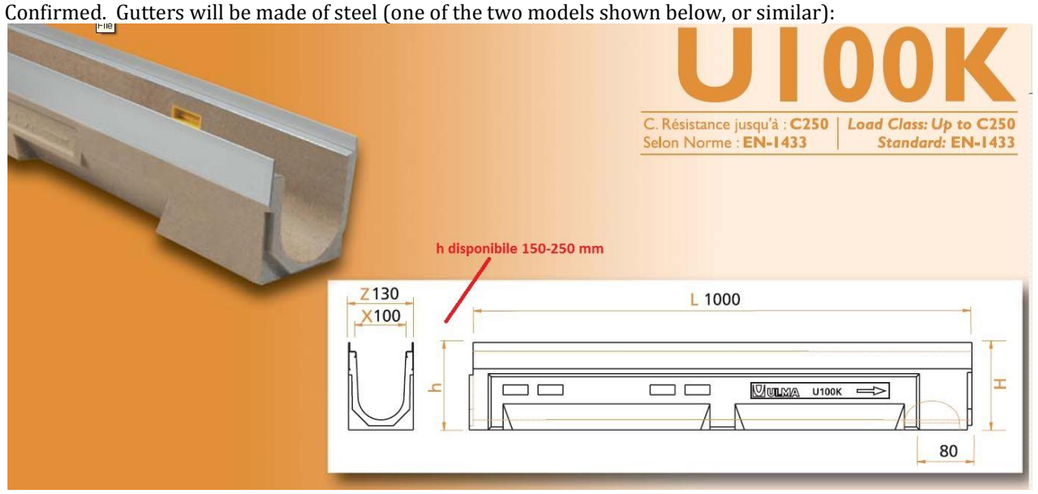
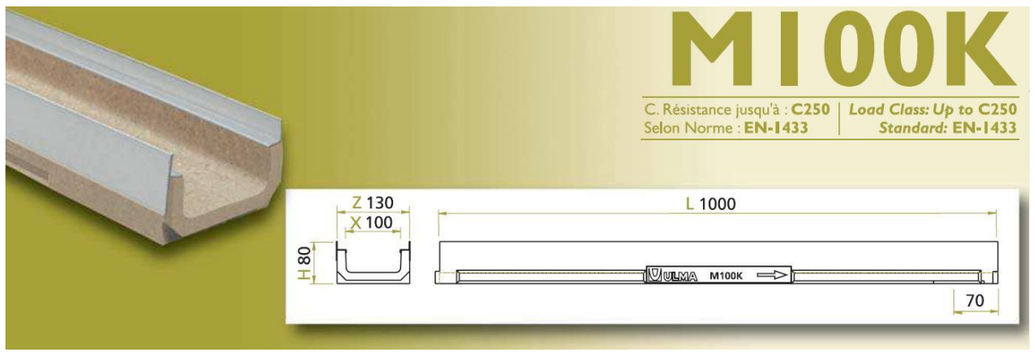
Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 26th June 2019
Introductory text	×	In the tab of, ''If you know your Application Reference Number, please enter it into the box below:'' kindly enter IP0001/19.	Noted. This will be updated in the consolidated application.	✓	Noted
A1.1	✓	Noted.	-		
A1.2	✓	Noted.	-		
A1.3	✓	Noted, address in the permit will be updated accordingly. **Document: Appendix 1** Noted.	-		
A1.4	×	IPPC permit: IP 0001/14/B determined (November 2018) To be attach issued version.	This will be included in the consolidated application.	✓	Noted
	✓	**Document: Appendix 2: DMU 6745 (submitted 4.4.19)** Noted.	-		
	?	**Document: Appendix 2: LPG secondary storage permit issued by REWS, licence no. LPG-00110-SS (SS110), last renewed in May 2018.** Noted. In view of PA3638/18 kindly advise when an updated REWS license will be provided for the 25,000 Litre LPG storage tank.	This will be provided to ERA within two weeks of issue. An engineer (Ing. Nicholas Bellizzi) has already been engaged to start the application process.	✓	Noted. This shall be recommended to be included as an Improvement Program Item unless submitted prior to determination by the ERA board.
	×	Relevant development permits: **Document: Appendix 2: Decision Notice PA 04236/08** Noted. **Document: Appendix 2: Decision Notice PA 03033/12** Noted. **Document: Appendix 2 Decision Notice PA 3638/18** Noted. **Document: Appendix 2 DN 0624/16** Noted. **Document: Appendix 2 DN 0023/17** Noted **Document: Appendix 2 DN 00617/17** Noted.		✓	Noted

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 26th June 2019
		Document: Appendix 2 DN 00810/17 Noted. **Document: Appendix 2 DN 01094/18** Noted. Kindly refer to Planning Authority feedback which will be provided at a later stage.	Please see the response to the statutory consultation feedback.		
A2.1	✓	Noted.	-		
A3.1	✓	Noted.	-		
A3.5	×	Company registration number C3250 does not exist. According to the below link Sterling Chemical Malta Ltd. Has the following registration number: C32508 https://support.roc.mt/pages/SearchCompanyInformation.aspx Kindly update.	Noted. Typo will be corrected in the consolidated application.	✓	Noted
	✓	***Document: Appendix 3: Company registration certification*** Noted	-		-
A3.6	✓	Noted.	-		-
A3.6	✓	Noted.	-		-

Form C

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
C1.1	✓	Proposed variations have been noted.	-		
C1.2	✓	***Document: Volume 2: Chapter 2: C1.2- Non-Technical Description*** Noted.	-		
C1.3	✓	***Document: Volume 2: Chapter 2: C1.3 Proposed Variations*** Noted.	-		
C1.4	✓	Noted	-		
C1.4.1	×	***Document: Volume 2: Chapter 2; C1.4 Site Maps and Reports*** **Figure 3.1: Scheme layout** **Figure 3.2: Scheme layout (Level 1)** **Figure 3.3: Scheme layout (Level 2)**	Noted. These drawings will be included as an Appendix in the consolidated application.	✓	

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
		Figure 3.4: Scheme layout (Level 3) **Figure 3.5: Scheme layout (Level 3 intermediate)** **Figure 3.6: Scheme layout (Roof level)** Noted. The high-resolution diagrams provided to the authority on 12.4.19 are to be consolidated as part of the application. ***Document: Volume 3: Addendum 2 to Land & Groundwater Risk Assessment*** i. In terms of impermeability, is there any area from the HF53 block which will not be rendered impermeable. ii. On point 11, it is mentioned that, *''in 2017 a small part of the HF 53 site (at the northern western corner of the HF 53 block) was used by the Operator as a temporary waste storage area, for storage of liquid hazardous waste prior to removal off-site. The flooring in this area was composed of impermeable concrete; prefabricated containment was also used for storage of liquid hazardous waste. The Operator has confirmed that no spills occurred in this area. Waste storage activities here ceased in January 2018, and construction of an industrial building started in October / November 2017. During construction, excavated rock from the HF 53 site itself was compacted and used for backfilling.''* a) What was the volume of liquid hazardous waste maximum volume stored at any one time? b) When did such activity of storage of waste initiate and cease? c) What was the nature of the hazardous waste stored? d) Kindly identify on a site plan the extent of the area used for such storage? iii. Kindly clarify what is meant by the following statement. ''Local extraction, leading to the scrubber, is used when any containers are	i. All the ground floor (Level 1) in the HF53 block will be concreted and underlain by an impermeable lining. ii. a) The maximum volume stored at any time was 6,000 L. b) This activity started around 2017 (the exact date is not documented) and ceased in January 2018. c) Liquid hazardous waste was stored, of the same types that are currently produced and stored in the temporary waste storage area (HF 50 block). d) Please see **Attachment 1**. iii. A local extraction system is used, which leads to the scrubber. A photo of such a system is included below.  iv. These will be drums or similar, as shown in Figure 3.13 in Volume 2.		i. Noted. This matter will be discussed further with the operator independently from this application. ii. Noted a) Noted b) Noted c) Noted d) Noted iii. Noted iv. Noted v. Noted

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
		opened.'' In point 21. iv. Kindly provide further information on what containers (referred to in point 22) will be used. v. In terms of the gutters leading into the reservoirs, can you kindly confirm that is also made of material, which is impermeable. The above queries are to be considered in preparation of an updated Risk Assessment covering the proposed extension.	v. Confirmed. Gutters will be made of steel (one of the two models shown below, or similar):   Volume 3 will be updated in the consolidated application.		
C1.4.2	✓	***Document: Volume 1: Appendix 1:*** Noted.	-		
C1.4.3	✓	***Document: Volume 3: Addendum 2 to Land & Groundwater Risk Assessment*** Noted.	-		
C2.1	✓	***Document: Volume 2: Chapter 3*** Noted. Improvement Programme Item 2: *Obtaining ISO 14001 accreditation and implementation of the corresponding Environmental Management System* will be retained.	Noted.		
C2.2		**Document: Volume 2: Chapter 3; C2.1**			

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
C2.2.1	✓	**Environmental Management System** Noted.	-		
C2.2.2	✓	**Document: Volume 2: Chapter 3; C2.2 Proposed Activities** **Noted.**	-		
C2.2.3	✓	**Document: Volume 2: Chapter 3 Figure 3.12 Process flow chart** Noted.	-		
C2.2.4	✓	***Document: Volume 2: Chapter 3; C2.2.4 Best available technique assessment*** Noted.	-		
C2.2.5	✓	**Document: Volume 2: Chapter 3; C2.2.5 Alternatives** Noted.	-		
C2.3	✓	**Document: Volume 2: Chapter 3; C.3 Raw materials** Noted. The Operator is reminded that as per condition 1.6.1 in IP0001/14/B, the Authority is to be notified prior to the production of any new APIs other than those approved by the Authority; the Operator shall notify the Authority 1 month prior to the start of production. Correspondingly the raw materials used and solvent consumption which will be used in the R&D must also be declared in the AER.	Noted. The prenotification procedure will be followed prior to new API production, whereas any raw materials / solvents used in the pilot plant will be reported in the AER.	✓	Noted
C2.4	✓	**Document: Volume 2: Chapter 3; Ozone Depleting Substances and Fluorinated Greenhouse Gases** Noted, Operator is reminded that no new equipment or components containing substances falling within the scope of EC Regulation No. 1005/2009 on Substances that Deplete the Ozone Layer & S.L. 549.58 on Substances that Deplete the Ozone Layer, shall be installed within the site.	Noted.		
C2.5	✓	**Document: Volume 2: Chapter 3; C2.5 Maintenance**	Noted.		

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
		Noted. Maintenance plan is to be provided once this is available.			
C2.6 C2.6.1. C2.6.2	✓	**<u>Document: Volume 2: Chapter 3; C2.6 Energy</u>** Noted.	-		

C2.7	x	**Document: Volume 2: Chapter 3; C2.7 Water**
		
		"3.53. At the Scheme, mains water intended for use production and plant / system cleaning activities will be purified using a water softener. This will be installed in the utilities area (Level 3 in the HF 53 block). Reject from this softener will be discharged to the new rainwater reservoir in the HF 53 block; the overflow from this reservoir is discharged to below street level (to road level if the main overflow fails)."
		
		• Kindly provide MSDS sheet for the water softener that will be used.
		• What is the estimated volume of reject water which will be produced daily?
		• During the design phase for the overflow, kindly verify whether other options for brine reject disposal have been explored.
			• This is included in **Attachment 2**.
			• The quantity will be less than 100 L per week.
			• Given that:
			  ○ the volumes of reject water generated from the water softener system are minimal (<100 L per week);
			  ○ there are minimal constituents in the reject from the softening system; and
			  ○ overflow to street will only occur if the rainwater reservoir (having a capacity 1,032 m^3) is full, and so will not be a routine occurrence,
			It has not been considered necessary to consider alternative disposal methods
				✓	• Noted

C2.8	✓	**<u>Document: Volume 2: Chapter 3; Risk Assessment</u>**
		
		1. Noted. An update to the Plant Risk Assessment (submitted as part of IP0001/14/A), will be required for phase 2.
		2. Reference is made to the fire safety and ventilation report (Annex 1) and point 3.60 in which point 5 states that the said report is to be reviewed and ensured by third parties. Kindly confirm as to whether ERA shall be expecting other follow-up report affirming the finding of this report?
		
		<u>Document: Risk assessment in the EIA</u>
		
		In the event of a fire, clarification is required as to whether containment measures are in place for the firefighting water run-off or any other extinguishing
			1. Noted.
			2. Yes, once the building has been constructed and finished, the architect will certify that it has been constructed in accordance with the recommendations in this report.
			
			The firefighting arrangements in the HF53 block are summarised below:
			• **Level 0** (parking): Class ABC dry chemical, foam, CO_2 fire extinguishers, water (including sprinklers), fire blankets
			• **Level 1**: No sprinklers on this level
			  ○ Production lines, clean rooms, warehouse, workshop, boiler room: Class ABC dry chemical fire extinguishers (no water)
			  ○ Ante-room to production areas: Foam fire extinguishers
			  ○ Terrace, road, store, stairwell next to utilities area: Water
			• **Level 2** (double height over level 1): No sprinklers on this level
			  ○ Clean room plant area: Class ABC dry chemical fire extinguisher (no water)
			  ○ Office area: Class ABC dry chemical, foam, CO_2, fire extinguishers, water, fire blankets
			• **Level 3 and Level 3 intermediate**: No sprinklers on these levels
			  ○ External areas: Water, Class ABC dry chemical, foam fire, and CO2 fire extinguishers, fire blankets
			  ○ Data room / UPS, stairwells: Water
			• **Roof level**: Class ABC dry chemical fire extinguishers, fire blankets.
			
			Therefore in the areas where hazardous substances are used no water is proposed (as detailed above). It is expected that
				✓	2. Noted. This is being recommended to be included as an Improvement Program Item.
					
					With reference to the risk assessment in the EIA, replies are being noted without any prejudice to CPD's requirements.

<table>
<tr><th>Section</th><th>Duly made?</th><th>ERA Comments
14th May 2019</th><th>Sterling Chemical Malta Ltd
11th June 2019</th><th>Duly made?</th><th>ERA comments
1st July 2019</th></tr>
<tr><td></td><td></td><td>media used in the event of a fire.

<u>Document: Volume 3: Addendum 2 to Land & Groundwater Risk Assessment</u>

Risk rating noted.</td><td>the dry chemical fire extinguishers (which are proposed for the production lines, etc), would be retained within the area generated, since they do not flow easily. Therefore there is sufficient containment for potentially contaminated extinguishant.</td><td></td><td></td></tr>
<tr><td>C2.9</td><td>✓</td><td><u>Document: Volume 2: Chapter 3; Training</u>

Noted.</td><td>-</td><td></td><td></td></tr>
<tr><td>C2.10</td><td>✓</td><td><u>Document: Volume 2: Chapter 3; Cessation</u>

Noted.</td><td>-</td><td></td><td></td></tr>
<tr><td>C2.11</td><td>N/A</td><td><u>Document; C2.11 Multi-operator installations</u>

N/A</td><td>-</td><td></td><td></td></tr>
<tr><td>C3</td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>C3.1.1</td><td>x</td><td><u>Document: Volume 2: Chapter 4</u>

Kindly provide approximate amounts of wastes that will be generated from the phase 1 activities.</td><td>The main waste types and estimated quantities that will be generated from the phase 1 activities are indicated in the following table:

<table>
<tr><th>EWC code</th><th>Description</th><th>Estimated annual quantity generated (tonnes) - Phase 1 only</th></tr>
<tr><td>07 07 01*</td><td>Aqueous washing liquids and mother liquors</td><td>11</td></tr>
<tr><td>16 10 01*</td><td>Aqueous liquid wastes containing hazardous substances</td><td>5</td></tr>
<tr><td>07 07 03*</td><td>Organic halogenated solvents, washing liquids, and mother liquors</td><td>4</td></tr>
<tr><td>07 07 04*</td><td>Other organic solvents, washing liquids, and mother liquors</td><td>9</td></tr>
<tr><td>06 01 02*</td><td>Hydrochloric acid</td><td>0.003</td></tr>
<tr><td>06 01 06*</td><td>Other acids</td><td>0.02</td></tr>
<tr><td>07 07 10*</td><td>Other filter cakes and spent absorbents</td><td>0.45</td></tr>
<tr><td>15 01 10*</td><td>Packaging containing residues of or contaminated by hazardous substances</td><td>0.6</td></tr>
<tr><td>15 02 02*</td><td>Absorbents, filter materials (including HEPA filters), wiping cloths, protective clothing contaminated by dangerous substances</td><td>0.2</td></tr>
<tr><td>16 05 08*</td><td>Discarded organic chemicals consisting of or containing hazardous substances</td><td>0.03</td></tr>
<tr><td>16 05 06*</td><td>Laboratory chemicals, consisting of or containing hazardous substances, including mixtures of laboratory chemicals</td><td>0.01</td></tr>
<tr><td>15 01 02</td><td>Plastic packaging</td><td>0.2</td></tr>
</table></td><td>✓</td><td>Noted.</td></tr>
</table>

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
			15 01 01 Paper and cardboard packaging 0.1 15 01 03 Wooden packaging 0.2 20 03 01 Mixed municipal waste 0.6		
C3.1.2	✓	**Document: Volume 2: Chapter 4** **Noted**	-		
C3.1.3	x	**Document: Volume 2: Chapter 4** i. Kindly provide impermeability certification for all the proposed wash water reservoirs. ii. Kindly clarify whether the rain/wash water recovery in the HF50 site and washwater reservoirs in the HF53 will be vented to air so as to avoid the potential accumulation of explosive, toxic or corrosive gases;	i. The reservoirs will be certified upon completion of the works. We suggest that this may be included as a permit condition. ii. The wash water reservoir in HF 53 site is vented. However, the new reservoirs in the HF 50 site are outside the scope of the current IPPC application, and will be covered by a later variation.	✓	i. Noted and certificate shall be required to be submitted as part of the Improvement Program. ii. Noted.
C3.2	N/A	Noted	-		
C3.3		**Document: Volume 2: Chapter 4; Emissions to Sewer**			
C3.3.1			-		
C3.3.2	✓	Noted. **Document: Communication with WSC** Noted. **Document: Volume 1: Appendix 2** Noted.	-		
C3.3.3	✓	Noted	-		
C3.3.4	x	Kindly note that as per activity 43 in S.L. 549.45 the aforementioned wash-water reservoir are considered as cesspits under this regulation. Kindly refer to comments in C.3.1.3	Noted. Form B will be updated in the consolidated application, and in Volume 2 (section C3.3) a cross-reference will be included to the details on the reservoir (already provided in section C3.1 of the IPPC application).	✓	Noted. Above comment in C3.1.3 refers.
C3.4	N/A	Noted.	-		
C3.5	✓	**Document: Volume 2: Chapter 4; C3.5 Rainwater** Noted. See comments referred above C2.7.	-		
C3.6		**Document: Volume 2: Chapter 4; C3.6 Emissions to air**	i) The capacity of the scrubber is 5000 m^3/h, same as the existing scrubber, which is far in excess of what is	✓	i) Noted.

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
		i) Kindly confirm the capacity of the scrubber so as to ensure that the required emission mitigation is provided. ii) On point 4.27 it is stated; ''One new emission point covering general ventilation from the new production line is also being introduced (EM 14). Exhaust air from this area is released through air grilles having a basic fabric filter; the available information on this system is included in **Annex 2**. It is noted that no handling of powder is carried out in these areas, and if any containers are opened (e.g. reactors or IBCs), local extraction will be used which is directed to the new scrubber (EM 13).'' a) In terms of the plausible emissions form the production line, it is understood that the reactor will be mitigated as per point 4.24. In terms of other emissions from the centrifuges and dryers etc…will there be any mitigation in place for emissions from such? b) In addition should it be understood that the production area will only have the basic filter as mitigation for exhaust air?	needed to handle emissions from the pilot plant. ii) a) Dryers and centrifuge will be installed inside the cleanrooms, which as described in section C3.6 (emission point EM15), is abated by means of a HEPA filter. b) Confirmed, however, as mentioned all emissions from equipment are abated; additionally if any containers are opened, local extraction will be used, which is directed to the new scrubber.		ii) Noted. a) Noted b) Noted
C3.7	N/A	Noted.	-		
C3.8	N/A	Noted.	-		
C3.9 C3.9.1 C3.9.2 C3.9.3 C3.9.4	✓	**Document: Volume 2: Chapter 4; C3.9 Noise** Please refer to comments in statutory consultation feedback.	-		
C3.10.1 C3.10.2 C3.10.3 C3.10.4 C3.10.5	✓	**Document: Volume 2: Chapter 4; C3.10 Monitoring** i) In terms of point 4.41, in terms of monitoring frequency, this is be carried out at a frequency, which is to be decided by the Operator not on pre-determined quarterly	Noted. This reference will be updated in the consolidated IPPC application, to reflect the current conditions.	✓	Noted

Section	Duly made?	ERA Comments 14th May 2019	Sterling Chemical Malta Ltd 11th June 2019	Duly made?	ERA comments 1st July 2019
		basis, as per the current arrangement in permit B.			
C3.11	x	**Document: Volume 2: Chapter 3 (section C2.2); Emissions & waste summary** See comments in waste section.	-		
C4.1	✓	**Document: Volume 2: Chapter 5; Impact on the environment** Noted.			
C4.2	✓	**Document: Volume 2: Chapter 5 Impact on the environment** Noted.	-		
C5.1	✓	***Document: Volume 1: Appendix 4: Environmental Impact Assessment update report*** Noted.	-		
C6.1	✓	Noted	-		
C6.2	✓	Noted	-		
C6.3	✓	Noted	-		
C7.1	x	See replies in section A1.4	-		
C8.1	✓	Noted	Mr Marco Garilli will shortly be leaving Sterling Chemical Malta Ltd; Mr Alessandro Bianchi (who is already an approved TCP for the facility) will be the facility's TCP until a second TCP is nominated.	✓	Noted.
C8.2	✓	Noted	-		
C9.1	✓	**Document: Volume 1: Appendix 5; Expenditure plan** Kindly include costings in the expenditure plan for: a) Remedial action b) Clearing of all waste from site.	As mentioned, the type of pollution control systems at the Scheme (including for abatement of air emissions, and containment systems), as well as the types of substances and waste to be handled will also largely remain the same. It is therefore considered that the types of emissions (and associated expenses) in the event of a failure of the pollution control systems will remain approximately the same as in the current scenario. However, it is difficult to quantify the cost of remedial action as this would depend on the type of incident, the severity, and the area / receptors affected. As an indication, the cost of cleaning up and disposing of a small spill on site (2 m^3) that is outside the contained areas is estimated at €2,000 (including VAT). The cost of clearing all the waste on site including both the existing and proposed elements (and assuming that all waste storage areas and wastewater reservoirs are full) is estimated at €65,000 (including VAT). Additionally, as mentioned in the application, the Scheme includes measures (including containment and abatement systems) to reduce the risk of an incident requiring remedial measures.	✓	Noted.
C10	✓	**Document: Covering Letter** Noted	-		-

Feedback from Statutory Consultees

Comment received by	Feedback	ERA reply and comment 14.5.19	Sterling Chemical (Malta) Ltd. reply, 11th June 2019	Comment received by 26th June 2019	ERA reply 28th June 2019
External Consultees Feedback					
Environmental Health Directorate	The proposed changes consist of an R&D pilot plant (line 7 of the new production block in HF 53), and associated utilities, laboratories and other associated activities and changing rooms, toilets, offices and parking. 1. With these variations the Directorate has no objection 2. All mitigation measures regarding air and noise pollution are to be implemented during the operation phase by applicant to mitigate any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and the general public. The possible health effects of any residual impacts that cannot be mitigated and the overall cumulative impacts should also be taken into consideration. 3. As at present one cooling tower is already registered with the Health Authority with registration number 01901. 4. The Legionella Risk Assessment manual needs to be updated to included new changing rooms and toilet facilities. 5. Moreover, any other 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; 6. 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.	Operator to provide reply.	1. Noted. 2. Noted. 3. Noted. 4. Noted. This will be done by end 2019. 5. Noted. 6. Noted.	Kindly note that we do not have any further comments from our end.	Noted, no further comments required.
Malta Competition and Consumer Affairs Authority	No feedback provided.		-		
Malta Resources Authority	Please note that MRA has no comments on this application. 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.	No further comments.	-		

Comment received by	Feedback	ERA reply and comment 14.5.19	Sterling Chemical (Malta) Ltd. reply, 11th June 2019	Comment received by 26th June 2019	ERA reply 28th June 2019
Planning Authority	Following assessment of the attached drawings in connection with IPPC application renewal and variation IP0001/19 Sterling Chemical Malta Ltd, the following discrepancies from the Planning Authority's approved drawings were noted: Level 0 • Parking space reduced from 39 parking spaces to 36. • Rain water reservoir with the volume of 1477 m^3 changed into a store. • Construction of pump room adjacent to the emergency exit. • Service corridor extended further than that approved. • Construction of goods lift and extension to switch room. Level 1 • Change of use from offices / stores to laboratories. • Construction of goods lift and stores. • Shifting of emergency exit staircase. Level 2 • Roofing over part of double height space. • Change of use from canteen to laboratory. • Construction of goods lift. Level 3 • Construction of offices. • Construction of goods lift. • Addition of an intermediate level. General Note: The above changes may result in general changes on façade and increase in height. Such deviations may only be ascertained once façade details as built are submitted.	Operator to provide replies. In addition, ERA also requires clarification on the volume of the wash water reservoir. Plans provided indicate that the reservoir volume will be of 74 m^3, whilst in the DNO (810/17) the volume is indicated as 66 m^3.	The differences in the drawings are largely due to the constraints of the the DNO procedure, and will be rectified once the PA application is submitted. The volume of the reservoir will be 74 m^3.	There are no further comments to make and agree with the action to be taken by applicant.	Noted, no further comments required.
Regulatory for Energy and Water Services	Vol 1 document mentions that primarily fuel is used by the boilers while a generator is used for back up power. Vol 2 document mentions that diesel is used for heating. Even though it is stated that tanks will be stored within a bunded area and /or double skinned, the Regulator would like to inform the Environment and Resources Authority that Sterling Chemical Malta Ltd. should register any fuel storage with the Regulator for Energy and Water Services (REWS). Different application forms exist, depending on the type, use and quantities of fuel stored. Any queries on the application forms should be sent to enquiry@rews.org.mt. Clarification on the text on pages 87, 191, 239 of Vol 1 document: "Diesel-operated generators (diesel is not flammable)" Same goes to	Operator to note.	Noted. These comments refer to the generators proposed as part of Phase 2 (and referred to in the EIA Update Report); these generators are outside the scope of the current IPPC variation application and will be covered in a later variation application.	The Regulator for Energy and Water Services has no further comments to what was provided in our comments dated 16th April 2019.	Noted, no further comments required.

Comment received by	Feedback	ERA reply and comment 14.5.19	Sterling Chemical (Malta) Ltd. reply, 11th June 2019	Comment received by 26th June 2019	ERA reply 28th June 2019
	the Maltese text on page 103. It is to be noted that the above text is not correct due to the following reason: From 1st June 2015, the classification of diesel (EN 590) and similar fuel oils changed to flammable liquids under the CLP Regulation Classification, Labelling and Packaging (EU) regulation 1272/2008. It follows therefore, as of 1st June 2015, the upper flashpoint for flammable liquid increased from 55°C to 60°C, and, as a result, diesel, along with other similar fuel oils, are now classified as a flammable liquid.				
Civil Protection Department	No feedback provided.	N/A	-	A fire safety inspection which took place on 10th May 2018 was provided to ERA.	Operator to take note of CPDs requirements.
Water Services Corporation	If the nature of the waste water discharged to sewer by Sterling Chemicals Malta Ltd. were to change from the current discharge of domestic sewage only (whether due to the extension of the factory or change in operations), they are to apply for a modification of their public sewer discharge permit at the DPU.	Operator take note and provide reply.	Noted. This procedure will be followed.	No further comments from our end.	Noted, no further comments required.
OHSA	With reference to the IPPC application renewal IP 0001/19, OHSA finds no objection to its approval by ERA, provided that the employer abides with Act XXVII of 2000 and all relevant OHS regulations.	Operator is to take note.	Noted.		
Internal Consultees Feedback					
Environmental Assessment Unit	No feedback provided.	No further comments.	-	No comments from our end.	
Biodiversity & Water Unit	BWU has no comments from a surface water perspective.	No further comments	-		
Air quality & Waste Unit **Air Quality Team**	No feedback provided.	N/A	-		
Air quality & Waste Unit **Waste Management Team**	With regards to the this application, the waste team has no comments.	No further comments.	-	The Waste Team has no comments.	
Air quality & Waste Unit **Noise Team**	As already suggested in the replies to the Environmental Assessment Unit on the EIA report consultation, when carrying out the noise monitoring study, reference to impact on the closest NSRs – residents at tal-papa in Birzebbugia (as indicated by the consultants themselves in the EIA report) is to be included.	Operator to take note.	Given that Tal-Papa is approximately 1.4 km from the Scheme, the impact of noise from the operation of Sterling Chemical is considered to be insignificant.	No further comments from our end.	
Compliance & Enforcement Directorate	With regards, to the proposed monitoring committee, CED does not see the necessity of setting up of a monitoring committee for this site. The burden of imposing such committees on ourselves as an Authority without significant or persistent compliance or operational issues to require it is not sustainable.	The Environmental Permitting Unit takes note of the comment provide by CED. However, this request was made during the EIA consultation process.	Noted.		

Attachment 1: Location of former temporary waste storage area

INDICATIVE ONLY - Not to be used for direct interpretation

Former temporary waste storage area

Legend

- Former temporary waste storage area
- Existing site boundary
- Proposed site extension

IP 0001/14
IPPC application

Map by: en-sure monitoring

Client: Sterling Chemical Malta Ltd	Ref: ES_STG004
File ref: IPPC\Sterling\Maps	Date: 5 / 2019

Attachment 2: Safety data sheet for water softener

AXAL® PRO SALT TABLETS

Pure dried vacuum salt

CAS-No.: 7647-14-5 **EINECS-No.:** 231-598-3

Appearance Totally soluble PDV salt tablets

Chemical Analysis	Specification	Typical	Methods
• Sodium chloride	> 99,9 %	99,93 %	EN 973
• Calcium + Magnesium	< 0,01 %	0,004 %	ISO 2482
• Sulphate	< 0,1 %	0,04 %	ISO 2480
• H_2O-insoluble	< 0,01 %	0,005 %	ISO 2479
• Moisture	< 0,1 %	0,02 %	ISO 2483
• Arsenic	< 0,3 mg/kg	< 0,1 mg/kg	EN 973
• Cadmium	< 0,5 mg/kg	< 0,1 mg/kg	EN 973
• Chromium	< 0,75 mg/kg	< 0,1 mg/kg	EN 973
• Mercury	< 0,05 mg/kg	< 0,02 mg/kg	EN 973
• Nickel	< 0,75 mg/kg	< 0,1 mg/kg	EN 973
• Lead	< 2 mg/kg	< 0,5 mg/kg	EN 973
• Antimony	< 2,6 mg/kg	< 0,1 mg/kg	EN 973
• Selenium	< 2,6 mg/kg	< 0,1 mg/kg	EN 973
• Copper	< 2 mg/kg	< 0,1 mg/kg	EuSalt AS 015
• Iron	< 2 mg/kg	< 1 mg/kg	EuSalt AS 015
• Manganese	< 1 mg/kg	< 0,1 mg/kg	EuSalt AS 015

Physical Properties		Methods
• Bulk density	ca. 1.000 kg/m³	EN 1236

Note

Specifications are based on requirements of NF, EN 973, EN 14805 and Codex Alimentarius. Typical values are based on regular analysis.

Dimensions

Diameter: 25 mm Height: appr. 16 mm Weight: appr. 15 g

Granulometry

Fines < 5.0 mm max. 4.0 % typical: 2 % Method: EN 1235

Note

The tablets are produced from refined food grade salt which complies with the purity criterion of the Codex Alimentarius.
This product is in compliance with EN-973(A): regenerating salt for ion exchangers and EN 14805 type 1: Chemicals used for treatment of water intended for human consumption – Sodium chloride for on site electrochlorination using non-membrane technology.

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www.esco-salt.com **Certification according to EN ISO 9001:2008**

AXAL® PRO SALT TABLETS

Pure dried vacuum salt

Tablets produced in Borth, Dombasle and Harlingen are in compliance with the NF mark for water treatment devices: regenerating salts for water softeners.

Field of application

For industrial uses.
AXAL® PRO tablets are specially produced to obtain a very pure brine for regeneration of ion exchange resins in water softeners.

Production process

AXAL® PRO tablets are obtained by very high mechanical pressure, without anticaking agent.

Storage

Handling and storage should be ensured under proper hygiene and preservation conditions so as to exclude any risk of contamination. Do not stack up more than 3 pallets.

Safety

A safety data sheet on SODIUM CHLORIDE can be obtained from esco on request. Sodium chloride is exempt from the REACH registration requirement because it is a natural mineral.

Supply Data

- 25-kg-PE-bags on pallet
- Other delivery forms on request

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