

Annex II: Feedback received following the Statutory Consultation carried out for the application of the full surrender of the Crystal Pharma Ltd. carried out between 2 February 2018 – 12 February 2018

Comment received by	Feedback	ERA reply and comment 14.2.18	Crystal Pharma Ltd. reply
External Consultees Feedback			
Environmental Health Directorate	Please be informed that this Directorate does not have any comments/recommendations regarding the full surrender. Furthermore the mentioned cooling tower, Registration number 1501, has been deregistered on 29 th January 2018.	No further comments.	Noted
Malta Competition and Consumer Affairs Authority	No feedback provided.		
Malta Resources Authority	No feedback provided.		
Planning Authority	The surrender of the IPPC does not constitute a development and hence there is no objection from a planning point of view.	No further comments	Noted
Regulatory for Energy and Water Services	<p>The Regulator notes the following from documents provided in the CD :</p> <p>1. “A diesel tank and a waste liquids process tank are present on site. These will be emptied and cleaned by a licenced waste contractor. Equipment will remain on site for reuse as per agreement with MIP”.</p> <p>and</p> <p>2. “... In addition, raw materials were properly handled and stored.”</p> <p>And</p> <p>3. “The Site ceased production on the 31st July 2017 and is currently conducting the decommission process. ERM conducted a Site visit in May 2017 with the aim of conducting a preliminary environmental assessment within the context of the potential Site Closure Process. At the time, sale of the Site was also being considered.”</p> <p>Crystal Pharma has sent a letter dated 23/01/18 informing the Regulator that the tank was cleaned by waste carriers and fuel has been safely disposed.</p> <p>As for the surrender of the IPPC permit the REWS has no further comments.</p> <p>Since the equipment including the thermal oil reservoir and diesel reservoir for boiler will remain on site, if you are in communication with MIP or any other applicant interested in this site’s communication, then the applicant should get in touch with the Regulator for Energy and Water Services (REWS) for guidance in authorisations/notifications of any secondary storages facilities of petroleum.</p>	No further comments	Noted
Civil Protection Department	<p>Feedback received from CPD on 19 February 2017:</p> <p>The Civil Protection Department does not find any objection for the proposals to take place, provided the dismantling of the plant is made or carried out according to the decommissioning report prepared. And that no flammable or hazardous chemical materials are left on site.</p> <p>The fire hydrant system is to be left active at least until the whole dismantling process takes place. A competent person will have to remain available throughout the whole dismantling process to advise the fire service with any hazardous materials kept there until the whole area is made safe.</p>	Operator to take note of comments	Noted
Water Services Corporation	Comments:	With regards to comments 1-3, Operator to note feedback provided and ensure that all	Comments 1-3. Noted

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	<p>1. Feedback to ERA comment no.13 (Section 4 no. 1.6) – All cleaning/rinsing operations of pipework, equipment and tanks which will be channelled to the existing waste water sump shall not be discharged to sewer prior to testing of this effluent is performed and approval given by the Discharge Permit Unit.</p> <p>2. Upon surrendering of the Sewer Discharge Permit, Crystal Pharma are to give a report of all waste waters generated by the decommissioning process including a description of the source of waste water, approximate volume, mode of disposal and name of waste contractor.</p> <p>3. During transport/relocation of chemicals, it is important that spillage mitigation measures are observed and any spillages of chemicals should not be directed to sewer but contained and disposed of through approved waste contractors. Same applies for the storage/transport/relocation of raw materials.</p> <p>Clarifications:</p> <p>1. Since the cooling tower and scrubber will not be demolished it is being assumed that these structures will be drained and cleaned. Where will such waste waters be discharged?</p> <p>2. Will the backup waste water tank be removed from site? If yes, will this be rinsed on-site? How will such rinses be disposed?</p>	<p>conditions are abided with. Such requirements will also included as part of the IPPC permit.</p> <p>With regards to Clarifications 1-2, Operator is to clarify.</p>	<p>Clarifications:</p> <p>1. The waste water generated after cleaning the scrubber and the cooling tower were treated as NHAW and disposal through PTMatic</p> <p>2. No, it will stay. It has been cleaned on September 12th 2017 by Falzon group. Waste generated were managed by Falzon group.</p>
OHSA	Kindly note that it is the obligation of the employer to conform to all applicable OHS legislation. In the documents submitted the operator declares adherence to all Occupational Health and Safety regulations. Hence there are no further comments from our end.	Noted. Requirements will be included as permit conditions	Noted
Internal Consultees Feedback			
Environmental Assessment Unit	No feedback provided.		
Biodiversity & Water Unit	No feedback provided.		
Air & Waste Air Quality Team	No feedback provided.		
Air & Waste Waste Management Team	<p>After reviewing the documents in relation to the Full Surrender of permit for Crystal Pharma, please note that the waste team has no particular comments with regards to the decommissioning of the site and the procedures outlined for the testing of soil/land contamination.</p> <p>It should be highlighted that any waste related activities need to be carried out in line with S.L.549.63 – the Waste Regulations, waste planned to be disposed of in a landfill would need to meet the criteria set out in Council Decision 2003/33/EC, and any shipment of waste needs to be in line with Regulation no. 1013/2016.</p> <p>One observation from our end. It seems that ERA comment under Section E.3.2 dated 31st January 2018 with regards to Annex 11 – Waste Logbook has not been addressed.</p>	<p>Operator is to note feedback provided and ensure that all conditions are abided with. Furthermore these will be included as permit conditions.</p> <p>Revised Waste Log has been circulated.</p>	Noted
Air & Waste Noise Team	Please note that there are no comments from a Noise perspective.	No further comments.	
Compliance & Enforcement	No comments received to date.		
Permitting Unit	No feedback provided.		

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Waste Permitting			