

**Annex II: Feedback received following the Statutory Consultation carried out for the application of renewal of the Amino Chemicals Ltd. carried out between 6 February 2018 – 12 February 2018**

Comment received by	Feedback	ERA reply and comment 14.2.18	Amino Chemicals Ltd. Reply 16.2.18
<b>External Consultees Feedback</b>			
<b>Environmental Health Directorate</b>	Kindly be informed that this Directorate does not have any comments/recommendations regarding this renewal. This is due the fact that there are no relevant changes, as mentioned in letter dated 3rd January, 2017 by Mr Antonio Sommei, Plant Manager.  Furthermore the mentioned cooling towers, CTW-01 & CTW-02, have been deregistered on 25th January 2017 and CTW-04 has been registered with our Directorate on 13th March 2017.	No further comments.	
<b>Malta Competition and Consumer Affairs Authority</b>	No feedback provided.		
<b>Malta Resources Authority</b>	The MRA has no comment on this application in so far as the groundwater functions under its immediate remit.	No further comments.	
<b>Planning Authority</b>	No feedback provided.		
<b>Regulatory for Energy and Water Services</b>	With regards to Fuel the following was noted:  From Energy Audit Report Rev 01: Diesel is used for the production of process hot water and steam generation by means of two steam generating boilers. One of the boilers is 14 years old while the other one was installed in 2009, hence it 7 years old. Steam is used in the process driers for the drying of the product. Hot water is used for heating of reactor jackets to control the required chemical reactions of the product.  Also, IP0003-06 document mentions: IP Item (13) Installation of bunding around the fuel storage of the generator located within the A50 site.  We have no comments on the IPPC permit per se. To note that the Regulator has still not received any application forms from Amino Chemicals to operate Secondary Storage Facilities of petroleum (under S.L. 545.22), including those which operate boilers and generators at A50 and A61 sites of Marsa Industrial Estate.	Operator is to ensure the necessary secondary fuel storage authorisations obtained. Kindly submit evidence of the request for authorisation from REWS for secondary fuel storage.	Application will be submitted to REWS for the secondary storage facility utilised for the boilers by latest end of February 2018 upon completion of audit by REWS registered Auditor. Works are currently on going in preparation to install a pre-fabricated roof above the fuel storage tank bund for the boilers. These works are required for the approval to operate a secondary storage facility.  Fuel storage designated for the two generators and two fire pumps in total is below the 300 ltrs margin stipulated in S.L. 545.22
<b>Civil Protection Department</b>	No feedback provided.		
<b>Water Services Corporation</b>	No comments.	No further comments.	
<b>OHSA</b>	From an OHS point of view the applicant  The applicant shall abide by all relevant OHS legislation and in particular: Appoint a Project Supervisor for the Design Stage and a Project Supervisor for the Construction Stage and any such appointment shall be terminated, changed or renewed as necessary. The same person may be appointed to act as project supervisor for both the design and	Noted. Requirements will be included as permit conditions.  Operator kindly note OHSA requirements to ensure that these	Noted: Works will be controlled as per L.N. 281 of 2004  Duration of works will not reach the pre-notification duration

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	<p>construction stage, if that person is competent to undertake the duties involved and</p> <p>Keep a health and safety file prepared by the Project Supervisor for the Design Stage.</p> <p>When the construction works related to this application are scheduled to last longer than thirty working days and on which more than twenty workers are occupied simultaneously, or on which the volume of work is scheduled to exceed five hundred person-days, the Project Supervisor for the Design Stage shall communicate a prior notice to the Occupational Health and Safety Authority (OHSA) at least four calendar weeks before work starts.</p> <p>The Project Supervisor for the Design Stage shall draw up a health and safety plan which sets out the occupational health and safety rules applicable to the construction activities concerned, outlining the measures to ensure cooperation between different contractors and shall also include specific measures concerning occupational risks that may be present at this site.</p> <p>2. If the development concerns a current or intended work place (as defined under Act XXVII of 2000), including a 'change of use', in addition to the above conditions, the applicant shall obtain an Architect's declaration that the necessary requirements arising out of LN 44 of 2002 have been included in the plans /drawings.</p> <p>In the case of sanctioning of works in a work place (as defined under Act XXVII of 2000), the applicant shall obtain an Architect's declaration that the building / development already carried out conforms to the requirements of LN 44 of 2002.</p> <p>All work equipment conforms to the requirements of the Work Equipment (Minimum Safety and Health Requirements) Regulations, L.N. 293/2016.</p>	are in place as per the timeframes indicated.	<p>requirement as stipulated in S.L.424.29</p> <p>References to S.L. 424.15 Noted</p>
<b>Internal Consultees Feedback</b>			
<b>Environmental Assessment Unit</b>	No comments from our end.	No further comments.	
<b>Biodiversity &amp; Water Unit</b>	No feedback provided.		
<b>Air &amp; Waste  Air Quality Team</b>	No feedback provided.		
<b>Air &amp; Waste  Waste Management Team</b>	With regards to the Amino Chemicals IPPC renewal, the waste team has no comments.	No further comments.	
<b>Air &amp; Waste Noise</b>	<p>From a Noise perspective, please find comments below:</p> <ol style="list-style-type: none"> <li>1. It should be highlighted to the applicant that any future noise studies need to be carried out according to the standard BS4142:2014 which replaced the standard BS4142:1997.</li> <li>2. In the current 2015 Noise emissions report, noise levels need to be calculated using correct reference time intervals. According to the standard BS4142:1997, this should be: <ol style="list-style-type: none"> <li>a. 1 hr during the day (07:00 - 23:00)</li> <li>b. 5 min during the night (23:00 – 07:00)</li> </ol> </li> </ol>	Noted. Operator to consider comments in future noise monitoring exercises.	Noted. A noise emission study will be performed in 2018 based on the current standard.
<b>Compliance &amp; Enforcement</b>	No feedback provided.		
<b>Permitting</b>	No feedback provided.		

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Unit Waste Permitting			