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European Commission
DG Environment, Unit G 4
Simplification of Titanium Dioxide Directives
Stakeholder Consultation
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Your Reference	Our Reference	Contact Person	Extension	Date
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Consultation Document on a Simplification of the Titanium Dioxide Directives

Dear Sirs,

On behalf of KRONOS INTERNATIONAL, Inc., the holding company of four production sites for titanium dioxide pigments in Europe, we should like to give the following comments:

Re question 1.

- a) Copperas should be deleted, as it is no solid waste, but a precious product, which as it is or reprocessed to monohydrate or ferric chloride solution is used for drinking-water treatment, feed and fertilizer production or for chromate reduction in cement.
- b) For the treatment of the coke residues KRONOS has developed a process enabling the use of the coke, among others, as a fuel in a high-temperature-process whereas the pigment and the ore residues contained in the coke have a positive effect on the lifetime of the bricklining.

The withdrawing of these substances has no effect on Articles 4 and 6.

Re question 2.

We strongly recommend keeping the limit values for the emissions to water and air within the scope of a product specific directive as otherwise both Directives 75/442/EEC as well as 86/280/EEC would have to be amended.

Re question 3.

No, we do not believe that the IPPC Directive as a general directive would be the proper place for the regulation of process specific matters.





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Re question 4.

We think that the prohibition of disposal could be further simplified. According to our suggestion, Article 5 should be reworded as follows: "Member states shall prohibit the disposal of any types of waste from the titanium dioxide industry on land unless prior authorisation provided that the conditions as laid down in Article 4 of Directive 75/442/EEC and the requirements for land filling according to Directive 1999/31/EC are met."

Re question 5.

We do not think that a further simplification is likely to be achieved.

Re question 6.


Annex 1 could be simplified by referring to Article 9 of Directive 92/112/EEC.

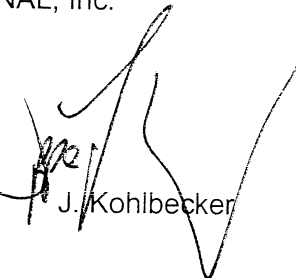
Re Annexes 2, 3:

- For the reference method of measurement you could refer to Article 9 of Directive 92/112/EEC.
- The minimum sampling and analysis frequency should be reduced. Analyses should only be done in spring and autumn to monitor the initial and final points of the biological process.
- Taking into consideration the values as published, an impact of the plant's waste water could not be demonstrated at any site; therefore, the frequency of the annual analyses should be reduced to every third year.

Yours sincerely,

KRONOS INTERNATIONAL, Inc.


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