




Form A


Section	MEPA Comments 18 September 2015	Reply by ElectroGas Malta Ltd. 07 October 2015	MEPA Comments 19 October 2015 (update on 18 September 2015 review) based on submissions of parts A and B3 to B9 on 7 October 2015	Reply from ElectroGas Malta Ltd – 17 th December 2015 for Parts A and B1, and 18 th January 2016 for Parts B1 to B9	MEPA Comments dated 18 th December for parts A and B1 and comments dated 26 th January for Parts B1-B9	Applicant's response submitted on 21/03/16 and 25/03/16	Duly made?	MEPA Comments 6 April 2016	Applicant's response submitted on 9, 18 & 26 May 2016	ERA comments 31 May 2016	Applicants Response June 2016
A1.1	Noted.	-	-	-	-		✓	-			
A1.2	Noted.	-	-	-	-		✓	-			
A1.3	Noted	-	-	-	-		✓	-			
A1.4	<p>1. Kindly include registration details and relevant documentation for the FSU including copies of all certificates issued. Reference to any such documentation shall be included in the form</p> <p>2. Kindly include reference to IPPC permit currently issued for DPS and a copy of the permit.</p>	<p>1. The FSU will have Malta Flag Registration. It will be classed under the classification society BUREAU Veritas (BV). These are currently being obtained and will be in place before the FSU sails from the shipyard in Singapore to Malta.</p> <p>2. This is a new and separate application and thus the current one will not be referenced in this application.</p>	<p>1. Noted. All details requested will need to be submitted prior to commencement of consultation with consultees.</p> <p>2. In view that the current IPPC permit also covers the area covered by the ElectroGas Plant reference to this permit shall be included. Kindly note that the permit being processed is a coordinated permit with the other operators</p>	<p>1. CLASS certification and Malta Flag will be granted once the conversion works are completed and before the vessel sails from Singapore to Malta. All documentation will be submitted at that time.</p> <p>This will not be possible prior to commencement with consultants</p> <p>2. We reiterate that this is a new submission by a different entity and thus the existing permit does not directly relate to this submission and will not be referenced.</p>	<p>1. Kindly provide timeframes by when such information and documentation will be available. Requirement of such certification during consultation with consultees will be further discussed with TM. Kindly confirm whether such certification will be available before public consultation.</p> <p>2. The footprint of the Electrogas facility is positioned on a site currently covered by the IPPC permit. Reference to this permit shall therefore be included.</p> <p><u>As at 26/01.16 comment above has been addressed</u></p>	<p>1. Discussions with the various regulatory bodies are ongoing and the necessary certification will be in place prior to sail away date from Singapore to Malta. This is currently predicted to be after public consultation circa June 2016.</p> <p>Please find below the provisional Registry Certificate</p>  <p>Provisional Registry Certificate - TM.pdf</p> <p>2. Closed</p>	✓	<p>1. Noted.</p> <p>2. -</p>	<p>1. Noted</p> <p>2. Closed</p>	<p>1. –</p> <p>2. –</p>	


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	3. Kindly provide copies of PA 0021/14 and PA 0022/14. Any subsequent minor amendments or additional development consent/ notification orders will need to be included.	3. Development permits are embedded in the form.	3. Noted. Any Minor amendments to these permits or related Development Notification Orders will need to be included and referenced in the form.	3. Minor amendment for PA 0022/14 included. See embedded file below  Requirements_Conditions for PA00022-14	3. Noted. Any amendments to PA 22/14 will also need to be included once it is determined which planning requirements will be applied to the land based facilities.	3. Agreed		3. Kindly provide an update with respect to the pending planning issue on site in respect of any amendments required to the development permits.	3. Amendments to PA00021/14 still to be processed.	3. Noted. Kindly clarify whether an application for amendment has been submitted to the Planning Authority.	PA/0021/14 minor modification submitted on 6 th June
A2.1	Noted.	-	-	-	-		✓	-		-	
A2.2	Not yet submitted	This will be Catherine Halpin and has been included in the form	Noted.	-	-		✓	-		-	
A3.1	Noted.	-	-	-	-		✓	-		-	
A3.5	Kindly provide copies of Memorandum and articles of association, copy of certificate of incorporation/ registration.	Company Registration number is C 69775 and certificate embedded in form A	Kindly provide a copy of memorandum and articles of association.	See attached	Copy not provided <u>As at 26/01/16 document has been submitted</u>		✓	-		-	


Form B

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B1 – About the Installation																
B1.1	Kindly include a list of the directly associated activities in the form.(see comment in section B 1.2)	Response not provided		See Comments dated 18 September 2015	Included the following; <ul style="list-style-type: none">LNG TerminalRegassification PlantCCGTDelimara 3 GRSCooling Water SwitchgearExisting Delimara Power Station	✗ ✓	Noted. Kindly resubmit form B with the list provided. <u>As at 26/01/16 form B updated</u>		✓	-	-	-				
B1.2	1. Kindly include list of block plans submitted with this section in the corresponding section of the form.	Response not provided		See Comments dated 18 September 2015	1. Included	✗	1. Form B not submitted. <u>As at 26/01/16 document has been submitted</u>		✗	1. With reference to document B0102 kindly find feedback below: a. Kindly submit drawing with external tie-in points b. Technical details including schematic drawings of the sewage treatment plant on board the FSU (including details of all effluents which will be	1. See below a. Drawing ref ENEM-URS-00-DR-ME-00106. Has is submitted b. See below, and reference section B3.3.1 Noted. The disposal of the treated grey water is proposed to be via barge to a	1. Please see comments below: a. With regards to the external tie-in points these shall be amended as per meeting held on 27/05/16 Regarding sewage from FSU kindly note that different parts of submission are conflicting. In the event that sewage from FSU shall be disposed of at sea	1. Drawing ENEM-URS-00-DR-ME-00106 updated accordingly Sewage from the FSU will be treated on board, stored in the grey water tank and disposed of via barge then tanker to a licenced treatment plant. This section has been	1. Drawing noted. Details regarding FSU are noted. As previously indicated please ensure that the barge operator applies for the necessary permits. In addition, kindly clarify whether the final disposal location will be at the sewage treatment plant or at an approved	1. The barge operator will be applying for the necessary permits. The current proposal is to dispose directly to at the treatment plant, and we will be communicating with WSC to conclude this.	Noted


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	<p>2. In terms of the block plan indicating Areas A, B, C and D in the introduction of the non technical description. Kindly note that the reference code in the text and the reference code on the drawing do not match. Kindly ensure that the block plan or the text are updated accordingly.</p> <p><u>LNG Facility process description</u></p> <p>1. Kindly confirm that the details (dimensions, capacity etc.) provided for the FSU in the section titled “LNG Facility Process Description” are those for the Wakabu Maru. Kindly also provide IMO number and registration details of the vessel. These are to be included</p>				<p>2. Updated</p> <p>1. It is confirmed that the details in this section are for the Wakabu Maru, although please note that the vessel is to be renamed Armada LNG Mediterrana. The current n IMO number is 8125868</p> <p>See embedded Vessel Form B (prior to conversion) below</p> <div><p>Wakaba Maru - LNG FORM B 2014.04.24</p></div>		<p>2. Document not provided</p> <p><u>As at 26/01/16 document has been submitted and amended as requested</u></p> <p><u>LNG Facility process description</u></p> <p>1. Noted. Details will be updated once vessel is reclassified and renamed.</p>	<p>1. please see response and attachment to 1.4 above which reference the provisional Registry Certificate. Note that the IMO number</p>		<p>treated within the plant e.g. boiler blower down, domestic sewage etc.). The treated effluent will have to comply with emission limit values which will be included as a permit condition. Regarding the disposal of treated effluent, Further discussion will have to be carried out with TM to confirm acceptability under MARPOL</p> <p>2. noted</p> <p><u>LNG Facility process description</u></p> <p>1. Noted.</p>	<p>suitable onshore treatment facility</p> <p>1.</p>	<p>kindly amend row 9 of the table in this section accordingly</p> <p>Kindly note that there is no onshore treatment facility which can accept wastewater via barge.</p> <p>2. Noted</p> <p><u>LNG Facility process description</u></p> <p>1. –</p>	<p>updated to reflect this.</p> <p>Noted; this will need to be via barge to tanker to treatment facility.</p> <p>2. Noted</p> <p>1.</p>	<p>manhole. Nonetheless confirmation from the Water Services Corporation will need to be updated.</p> <p>2. –</p> <p><u>LNG Facility process description</u></p> <p>1. –</p>	<p>2.</p> <p>1.</p>	

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	<p>in the submission of permit details in part A of the application</p> <p>2. In the section titled “LNG Facility Process Description” drawing ENEM-URS-FS-00-0052 has not been resubmitted. No drawings submitted in November 2014 bear such a reference number – kindly submit copy of this drawing.</p> <p>3. provide details on any chemicals, fuels (other than the LNG), sewage etc stored aboard the LNG including secondary containment, maintenance operations required such as hull cleaning repainting etc shall be briefly described in this section and further expanded in relevant sections below.</p>				<p>2. See embedded drawing below</p>  <p>47067567-E0-00-DR-ME-00052.pdf</p> <p>3. The following, in addition to LNG, will be stored on the vessel;</p> <ul style="list-style-type: none"> • 240m3 Diesel • Sewage, generated at circa 14 m3/week • Lube oil • Nitrogen consumed as generated by plant of capacity 140 Nm3/day • Waste generated on board estimated at 126 m3/week • Small quantities of boiler feed chemicals to be advised 		<p>2. Noted, Kindly update application document accordingly</p> <p>3. Submissions are noted, kindly update with additional details including secondary containment, maintenance operations required such as hull cleaning repainting etc. the submitted info and the requests above shall be briefly described in this section and further expanded in relevant sections below.</p>	<p>will not change.</p> <p>2. Included</p> <p>3. This has been updated as requested. Please note the inclusion of the sewage treatment plant in the description, the previously referenced sewage holding tank is clarified as being a treated sewage and grey water holding tank treated for disposal under MARPOL regulation 12mile out at sea. The</p>		<p>2. Noted</p> <p>3. The mention of secondary containment has been noted. Kindly provide full capacity details. With regards to the hull cleaning envisaged on the FSU, kindly note that approval for such works are to be authorised by MEPA. Once paint is applied to the</p>	<p>2.</p> <p>3. . The vessel external existing coating was fully removed 100% by grit blast cleaned to bare steel prior to applied approved paint system and final coat with TBT Free Anti-fouling coating. The TBT certification and data sheets and painting technical specifications have been included as back up documentation to the submission.</p>	<p>2. –</p> <p>3. Kindly provide full capacity details of the secondary containment . Submissions and clarification s regarding vessel painting are noted. See comment above regarding disposal location of effluent from FSU.</p>	<p>2.</p> <p>3. On deck tank is fully bunded and the rest of the tank are either in the engine room and this is fully bunded by the hull and drains to the blidge tank or have the hull as their secure primary bunding..</p> <p>This is explained in the text and tabulated in section B2.3.</p>	<p>2. –</p> <p>3. No ted .</p>	<p>2.</p> <p>3.</p>	

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					<p>4. The FSU has an emergency diesel generator rated at 150kW to power emergency systems only and a new auxiliary diesel generator for operational requirements, rated circa 3kW (as discussed to be confirmed)</p>		<p>4. MEPA awaits details and confirmation</p>	<p>tanks will all have secondary bunding due to the vessel's construction, in the same way as the LNG tanks are fully secondary bunded.</p> <p>Details of the hull inspection regime and cleaning operation are included and the paint is confirmed to be TBT free. See MSDS and certificates embedded.</p>  <p>FSU Hull P details.z</p> <p>4. The Service Generator is confirmed 1.9MW see attached</p>	<p>vessel, certification referring specifically to the vessel confirming that paints applied were TBT free will need to be submitted. Kindly also confirm whether the vessel hull has been/ will be stripped of all paints prior to application of the TBT free paint. Regarding the disposal of treated effluent, Further discussion will have to be carried out with TM to confirm acceptability under MARPOL.</p>	<p>It is confirmed that the hull was fully stripped prior to repainting. Note that the shipyard records are also included in the back up information. As stated above the treated effluent will be discharged via barge to a licenced disposal facility.</p>	<p>4. –</p>	<p>4.</p>	<p>4. –</p>	<p>4.</p>	<p>4.</p>	<p>4.</p>

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	4. Details on the diesel generator on the FSU are not provided. Kindly provide the rated thermal input and cross reference with relevant section of the IPPC application							<p>details below:</p>  <p>Tech DG Engineering</p> <p>The DG will only operate during storm mooring scenarios anticipated to occur twice a year. Each event is expected to be two days. Once moored away from the jetty the stable power requirement is about 850kW resulting in a low utilisation of the DG.</p>		<p>4. Details regarding the emergency diesel generator, back-up diesel generator are noted.</p> <p>5. Details regarding the frequency of the sts</p>	<p>5. This has been added. Approx. 18 STS LNG transfer operations with a duration of around 24hrs. There will be an LNGC every</p>	5. Noted.	5.	5.	5.	

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										transfers has been removed. Kindly provide details accordingly in this document also confirming the duration of the transfer operations between the LNG carrier and the FSU. 6. Regarding the LNG carrier, kindly indicate whether its engines will be on during ship to ship transfer. 7. Kindly make it clear in this document that there are two auxiliary	six to eight weeks, with a double fill per visit. 6. Typically the LNG visitor carrier's engines will be kept at low loads to produce sufficient power generation to fulfill electric loads required for the ship-to-ship transfer and other "hotel" loads. The technology of the propulsion and power generation system within the visitor cargo can vary from vessel to vessel. 7. 2x100% auxiliary boilers. Text updated	6. Noted. 7. Noted.	6. 7. 8. Every	6. 7. 8. Kindly update the waste section accordingly with this	6. 7. 8. Section B3.1.1, B3.1.2 and B3.1.3 have been updated accordingl	8. Noted. Disposal of the sludge may require testing as deemed necessary

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										<p>boilers. In the same paragraph, boiler is used whilst in other boilers is used.</p> <p>8. Kindly provide details as to how the treated sewage effluent will be disposed of as well as removal of sludge generated within the STP on board the FSU.</p> <p>9. Further details regarding the FSU boilers which are to be used while the FSU is mobilised (Phase 1) are to be provided: This is to include:</p> <p>a. Thermal capacit</p>	<p>accordingly.</p> <p>8. The treated effluent will be "grey" water quality and will be hold in a dedicated tank along with other effluents generated in the FSU such as washing machine and sink drain</p> <p>9. See attached discussion document. These details have been added to the text.</p> <p> FSU operation modes.docx</p>	<p>8. Kindly indicate whether there will be any sludge which can no longer be returned to the system. If so, please provide details of disposal. provide</p> <p>9. Noted.</p> <p>10. Noted.</p>	<p>five years the eater treatment plant will be serviced and this activated sludge will be dried and disposed of as solid through the 2 bags of 3litre</p> <p>9.</p> <p>10.</p>	<p>waste and identify a disposal location.</p> <p>9. –</p> <p>10.</p>	<p>y</p> <p>9.</p> <p>10.</p>	<p>by ERA and the waste treatment facility at the time of disposal.</p>

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					<p>1. The normal operating pressure in the gas pipeline will be 40barg for the CCGT and 7barg for D3</p> <p>2. The D3 gas pipework is designed for minimum 0barg to 16barg, and the D4 pipework is design is designed from 0barg to 60barg. The gas pipelines will have pressure relief valves as required to protect the pipework, as well as being connected to the NVCC for the safe relief of any over pressure built-up in the system in the case of an emergency. The NVCC is designed for the worst case scenario which is this case corresponds to a fire case in</p>		<p><u>Regasification Facility process description</u></p> <p>1. Noted, details shall be</p>			<p>b. Hours of operation</p> <p>c. Fuel used</p> <p>10. Clarification is required as to whether the boilers will be on full capacity while the vessel is moored to the jetty.</p> <p>11. Kindly provide a timeframe for the submission of the “In water survey manual”.</p>	<p>10. Refer to response to item 9 above. The boilers will only be operation during an STS operation (at max turn down) or during a storm disconnection event.</p> <p>11. This will be available 6 months after the FSU arrives, prior to the first cleaning and will be CLASS approved.</p>	<p>11. Noted. This will be included in the permit</p> <p>FSU Operational Modes.</p> <p>1. Kindly confirm in the table whether 1 main boiler will being operation during phase 1 sts transfer. This is to be reflected in the table.</p> <p>2. Kindly provide an explanation regarding the use of the 3 NVCC pilot flares which are not</p>	<p>11. Noted</p> <p>1. Table changed to confirm that only one boiler will be operational during STS transfers.</p> <p>2. Footnote added about this being discussed later in the submission</p>	<p>11. –</p> <p>1. Noted</p> <p>2. Noted</p> <p>3. –</p> <p><u>Regasification facility process description</u></p>	<p>11.</p> <p>1.</p> <p>2.</p> <p>3.</p>	

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	<p><u>Regasification Facility process description</u></p> <p>1. Please provide details on pressure of the gas within the pipework leading to Delimara 3 and the new CCGT</p> <p>2. Limits of over and</p>				<p>the LNG related equipment.</p> <p>3. The propane and water/glycol tanks will be located in the vicinity of the IFV, refer to drawing ENEM- URS-FS-00-DR-ME-00067</p> <p>4. Connections to the existing plant are</p> <ul style="list-style-type: none">• Demin Water• Cooling Water Inlet• Fire Fighting (fresh water and sea water)• Potable Water• HV, MV and LV electrical supplies <p>5. There will be an oil separator in the CCGT plant, refer to drawing MT1001-UZ-CLD103-444911146 plant reference 50UBH, from which the treated water will connect into the plant storm water system for discharge</p>		<p>compared with data submitted by D3PG.</p> <p>2. Noted, details shall be compared with data submitted by D3PG.</p> <p>3. drawing ENEM- URS-FS-00-DR-ME-00067 not at MEPA’s end kindly confirm whether you mean ENEM-JPA-E2-00-DR-ME-00068. Nonetheless, this drawing does not contain details required</p> <p><u>As at 26/01/16 drawing ENEM- URS-FS-00-DR-ME-00067 has been submitted, however details regarding the secondary containment required for the water/glycol tank have not been provided.</u></p> <p>4. Noted, kindly update application document accordingly</p> <p><u>As at 26/01/16 drawing</u></p>	<p>1. Noted</p> <p>2. Noted</p> <p>3.</p> <p>4. Close</p>		<p><u>Regasification Facility process description</u></p> <p>1. -</p> <p>2. -</p> <p>3. Statement regarding the containment of the 110% containment volume for the water/glycol system has been noted. Kindly</p>	<p>1. Noted</p> <p>2. Noted</p>	<p>mentioned anywhere in the rest of the text.</p> <p>3. Noted</p> <p><u>Regasification Facility process description</u></p> <p>1. –</p> <p>2. –</p> <p>3. Noted</p> <p>4. –</p>	<p>3.</p> <p>1.</p> <p>2.</p> <p>3.</p> <p>4.</p>	<p>All section has been noted.</p>		

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	<p>under pressure of the gas pipework shall be disclosed and process leading to the use of the NVCC shall be further explained.</p> <p>3. Kindly provide plan showing the propane and water/ glycol tank and describe any secondary containment required.</p> <p>4. Information provided in this section must also provide an explanation of all connections with the rest of the plant and their features. Reference to drawing 47067567-1019 shall also be included.</p> <p>5. Earlier drafts of drawings submitted</p>			<p>through the existing outfall to Marsaxlokk bay. For the regas plant any area having an oil risk, ie the transformers, will have a complete containment and any oil spillage will be removed via appropriate trucks, thus no oil interceptor is required.</p> <p>CCGT Power Plant process description</p> <p>1. The expected gross efficiency is 54.9% and expected net efficacy is 54%. The Net Output is 205MW. Actual certification will be provided after the Performance Test.</p> <p>2. The emissions during open cycle shall be the same as during combined cycle, with the exception of the cooling water discharge which will be reduced from 17,260 m3/hr to 1,760m3/h. The stack emissions will be the same with the exception of the temperature being higher and thus the discharge more buoyant.</p>	<p><u>the submission is noted.</u></p> <p>5. Noted. kindly confirm whether the interceptor at the regas station has been removed or not and whether a discharge point to sea in this plant shall be present.</p> <p>As at 26/01/16 submission is noted. in view that other sections stipulate that oily water at the regas will be treated via separator and discharged to sea kindly clarify this statement and amend required sections accordingly.</p> <p>CCGT Power Plant process description</p> <p>1. Noted. kindly update application document accordingly</p> <p>As at 26/01/2016 application document is noted,</p> <p>2. Noted kindly update application document accordingly</p>		<p>d</p> <p>5. The other sections will be updated. There is no Oil Separator prior to discharge to the sea in the regas plant as all areas with potential for oil contamination of fully banded.</p> <p>1. Closed</p>	<p>provide detailed calculations of the containment system.</p> <p>4. -</p> <p>5. Noted .</p> <p>CCGT Power Plant</p>		<p>5. -</p> <p>CCGT Power Plant process description</p> <p>1. –</p> <p>2. –</p>		<p>5.</p> <p>1.</p> <p>2.</p>		<p>CCGT power plant process description</p> <p>Section 1 to 6 noted.</p>		

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	<p>showed an oil water interceptor connected to a discharge point to sea in Marsaxlokk bay. This is not shown on drawings submitted with this version. Kindly confirm whether this is still in place, and if so include details on construction standards of the interceptor (eg. EN 858 etc), coordinates of the discharge point and show this on plans submitted.</p> <p>CCGT Power Plant process description</p> <p>1. Manufacturer specifications and certification related to thermal efficiency and thermal output of CCGT shall be provided.</p> <p>2. A brief description of emission values expected during open cycle shall be provided in this section and cross referenced with relevant section of IPPC application where further details will be provided.</p>				<p>3. During the open cycle phase, prior to full commissioning of the combined cycle phase, the same CEMS equipment will be used and the same probes installed in the monitoring ports in the bypass stacks. Once the combined cycle is in operation the probes shall be moved to their permanent location in the main stacks. The equipment is fully compliant with ISO 14956, EN 14181 and EN 15267.</p> <p>4. F-Gas is not used.</p> <p>5. Agreed and updated</p> <p>6. There will be Natural Gas filters in the D3 gas receiving station up</p>		<p>As at 26/01/2016 application document is noted,</p> <p>3. Noted, kindly note that CEMS will need to be certified prior to commencement of operations and recertified once these are installed on the main stacks, prior to commencement of closed cycle.</p> <p>As at 26/01/16, kindly note that CEMS are required on both the open cycle stack and the closed cycle stack. This is due to the fact that compliance checks for emissions would still be required should the plant be operating in open cycle (as may be the case during malfunction or maintenance of the closed cycle.</p> <p>4. Noted</p> <p>5. Kindly provide copy of updated application</p>	<p>2. Closed</p> <p>3. CEMS sampling probes will be installed in both main and bypass stacks. The monitoring system will be switchover between the two depending on the actual operating scenarios. Both will be fully calibrated.</p> <p>4. Closed</p>		<p>process description</p> <p>1. -</p> <p>2. -</p> <p>3. Noted. As per previous comments the CEMS would need to be certified prior to commencement of operations.</p>	<p>2.</p> <p>3. Note that the document has been updated to advise that we are no longer require a glycol storage tank and the water glycol loop is a fully closed system and thus does not require additional storage for makeup. We have however added the containment volumes to the submission where</p>	<p>3. CEMS QAL 1 certification noted. CEMS QAL 2 validation certification to be submitted post – commissioning.</p> <p>4. –</p>	<p>3. Agreed</p> <p>4.</p> <p>5.</p>			

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	<p>3. Kindly provide more details on the monitoring equipment to be used during open cycle. The readings shall be continuous as per CCGT mode. This shall be further expanded in the section on emissions to air and cross referenced with this section. These must comply with ISO 14956, EN 14181 and EN 15267</p> <p>4. Kindly confirm whether or not the Rankine steam cycle utilises F-Gas and if necessary cross reference with the relevant section in the application</p> <p>5. Reference to Directive 2008/50/EC shall be replaced by reference to Regulation 3 of LN 11 of 2013 (IED) and LN 478 of 2010, as amended (transposed</p>				<p>stream of the D3 tie in point. These will be Multi-cyclone coalescing type filters. Minimal particle waste is expected from these filters due to the relatively clean form of NG that the LNG process produces.</p> <p>7. This will be included in the updated EIS air quality assessment currently being completed. And will not be included in this submission.</p>		<p>document.</p> <p>As at 26/01/16 submission is noted.</p> <p>6. Noted. Kindly provide information on maintenance required on such filters and replacement frequency. Kindly include these filters in the waste section of the IPPC application.</p> <p>As at 26_01_16 – kindly amend text in application document with the your reply and clarifications to MEPA`s query</p> <p>7. Noted. Application document shall be updated accordingly and submitted prior to commencement of consultation.</p>	<p>5. Closed</p> <p>6. Updated</p> <p>7. Agreed</p>		<p>4. -</p> <p>5.</p> <p>6. Kindly include explanation provided in your reply dated 18 Jan 2016 in the main application document as previously requested by MEPA.</p> <p>7. Updated air dispersion models as requested by MEPA in recent</p>	<p>applicable.</p> <p>4. Closed</p> <p>5. Noted</p> <p>1. Noted</p> <p>2. Noted</p>	<p>5. –</p> <p>6. Not ed.</p> <p>7. Updated air dispersion models as requested by MEPA in recent correspondence shall be submitted once these are finalised. Such documents are required prior to commence</p>	<p>6.</p> <p>7. SOx model phase two will be submitted prior to Public Consultation</p> <p>8.</p>	<p>7. Noted.</p> <p>8. –</p> <p>9 –</p>		

Section	MEPA Comments 18 September 2015 – based on submissions on 11 August 2015	Applicant’s response 8 October 2015	D M	MEPA Comments 19 October 2015 (update on 18 September 2015 review) based on submissions of parts A and B3 to B9 on 8 October 2015	Reply from ElectroGas Malta Ltd – 17 th December 2015 for Parts A and B1, and 18 th January 2016 for Parts B2 to B9	D M	MEPA Comments dated 18 th December for parts A and B1 and comments dated 18 th January for Parts B2-B9	Applicant 1s response submitted on 21/03/16 and 25/03/16	D M	MEPA Comments 6 April 2016	Applicant1s response submitted on 9, 18 & 26 May2016	ERA comments 31 May 2016	Applicants Response June 2016	ERA comments 10 June 2016	Applicant response 14 June 2016	ERA Comments 15 June 2016
	<p>ambient air quality regulations).</p> <p>6. Kindly provide further information of the filtration process including any by-products/ waste resulting from this process.</p> <p>7. Appendix to EIS and coordinator’s assessment has not been submitted so the statement shall be further expanded in section on emissions to air. supporting data extrapolated from air dispersion models carried out for the facility and other available data is to be provided</p> <p>8. CEMS standard (EN</p>				<p>8. Confirmed and amended</p> <p>9. Connections to the existing plant are</p> <ul style="list-style-type: none">• Demin Water• Cooling Water Inlet• Fire Fighting (fresh water and sea water)• Potable Water• HV, MV and LV electrical supplies <p>10. Space has been allowed in the HRSG for future retrofitting of a Selective Catalytic Reduction (SCR) system if required, as advised in section B20204/B of this submission</p> <p>11. This ‘Demin Plant’ is more of a polishing plant, using as its source water the Enemalta Demin feed, no additional sea water nor dosing is required. This polishing plant is required in order to upgrade the Enemata demin water to the required quality of the CCGT steam cycle.</p>		<p>8. Application document has not been submitted</p> <p>As at 26/01/16 application document has been noted.</p> <p>9. Noted. kindly amend application document accordingly and include reference to drawing 47067567-1019</p> <p>As at 26/01/16 application document has been noted.</p> <p>10. Noted. Kindly amend main application document accordingly. This will be reflected in permit conditions</p> <p>11. Noted. kindly explain the polishing process and confirm whether any additional wastes shall be generated from the polishing process.</p> <p>As at 26_01_16 – filtration process noted, however kindly confirm whether any additional wastes shall be generated. Kindly include such wastes in the waste section</p>	<p>8. Closed</p> <p>9. Closed</p> <p>10. Updated</p> <p>11. This has been included in the waste generation section.</p>		<p>correspondence shall be submitted once these are finalised. Such documents are required prior to commencement of consultation .</p> <p>8. -</p> <p>9. -</p> <p>10. Noted .</p> <p>11.The waste section has not been submitted.</p>	<p>ment of consultation.</p> <p>8. –</p> <p>9. –</p> <p>10. –</p> <p>11. Regarding the location of the waste management area, final location details are to be provided once these are agreed upon with Enemalta. These shall be provided</p>	<p>9.</p> <p>10.</p> <p>11. The EGM proposal has been submitted to Enemalta and will be agreed with them prior to PC</p>	<p>10. –</p> <p>11. Noted. Details are to be submitted once both parties are in agreement.</p>	<p>11. Agreed</p>		

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	<p>15267) is noted but it must be ensured that the monitoring equipment is also compliant with ISO 14956, EN 14181. Kindly confirm and amend document.</p> <p>9. Information provided in this section must also provide an explanation of all connections with the rest of the plant and their features. Reference to drawing 47067567-1019 shall also be included.</p> <p>10. Kindly include information on how the plant allows for the installation of additional abatement equipment should these be required at a later stage.</p> <p>11. Plans submitted show a DM plant. Kindly confirm whether the water source will be the intake at Marsaxlokk bay. Kindly also confirm whether Enemalta will also be dosing and treating the seawater destined for this plant.</p>				<p>Service Tanks</p> <p>1. Moved</p> <p>2. Refer to drawings ENEM-URS-FS-00DR-ME-00066 and 00067 for tank locations. All diesel, oil and chemical tanks will have full secondary bunding. The LNG storage tanks shall have secondary containment as described in section B2.2.2</p>		<p>Service Tanks</p> <p>1. Kindly provide updated application document.</p> <p>As at 26_01_16 – update has been noted</p> <p>2. Kindly submit drawings and update main application document accordingly.</p> <p>As at 26_01_16. Submission of drawings has been noted. Regarding drawing ENEM-URS-</p>	<p>1. Closed</p> <p>2. Drawing included</p>		<p>Service Tanks</p> <p>1. -</p>	<p>6. There will be Natural Gas filters in the D3 gas receiving station up stream of the D3 tie in point. These will be Multi-cyclone coalescing type filters. Minimal particle waste is expected from these filters due to the relatively clean form of NG that the LNG process produces.</p> <p>7. Sox dispersion modelling for D4 has been submitted.</p>	<p>prior to commencement of public consultation.</p> <p>Service tanks</p> <p>1. –</p> <p>2. Table with CCGT banded volume is incomplete.</p>	<p>1.</p> <p>2. Table with bunding details added.</p>	<p>Service Tanks</p> <p>1. –</p> <p>2. With regards to the bunding of the CCGT, kindly note that for those tanks where the bund capacity does not meet the required bund capacity or no bunding has been indicated, the operator is required to install adequate budning to ensure</p>	<p>2. All bunding in the CCGT meets 100% capacity and where exposes to rainwater meets at least 110% with the exception of the EDG which has secondary containmen t as a double walled tank. However should it be a requirement of the permit this too can be</p>	<p>2. Noted. In view that item 13 (corrosion inhibitor for closed cooling water) is not bunded, this will have to be placed in a drip tray to ensure the required containmen t. With regards to the EDG, kindly note that the area where this is placed will have to be bunded.</p>

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	<p>Service Tanks</p> <p>1. Three sections listed here shall be included separately in relevant sections above for the sake of continuity</p> <p>2. Details on secondary containment and plans showing locations of each tank shall be provided. drawing numbers shall be cross referenced in this section for ease of reference</p> <p>Table at the end of section</p>						<p>FS-00DR-ME-00066 kindly explain whether both items 2 and 3 in the legend are related to the neutralisation of the blow down water from the HRSG. Kindly update the document with such an explanation.</p> <p>Regarding drawing ENEM-URS-FS-00DR-ME-00067 kindly explain item 16. In particular, the dosing chemicals to be used, and include emission points to sea and air in relevant drawings. Kindly also include any monitoring of discharges to be carried out. The above shall be explained in the relevant applicable sections</p> <p>Regarding all diesel, oil and chemical tanks kindly confirm that all secondary containment shall be a minimum of 110% of the largest tank within the bund or 25% of the total capacity of all the tanks within the bund, whichever is the greater. All filling and off-take points shall be located within</p>	<p>Item 2 is the dosing package for the HRSG make up water and item 3 is the dosing package for the neutralisation pit, which includes the blow down water. Text updated accordingly.</p> <p>Item 16 is the chemical dosing skid for the auxiliary boilers on the FSU that are used during ship to ship transfers to provide steam to the FSU</p>		<p>2. Explanation regarding the dosing packages (items 2 and 3 indicated in drawing ENEM-URS-FS-00DR-ME-00066) has been noted. Drawing has however not been submitted. All other explanations are noted. Kindly provide full calculations of the bunding capacity.</p>	<p>8.</p> <p>9.</p> <p>10. Closed</p> <p>11. There is a water polishing unit which shall operate when the demin water conductivity from Enemalta demin water plant diverts from a define conductivity</p>			adequate containing.	<p>bunded. Note these was a typo on item 11, the bunded volume had been left blank. This has now been updated</p> <p>Table at end of section.</p> <p>Points 1 to 4 are noted.</p>	

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	<p>1. Please provide an introduction to the table explaining its content.</p> <p>2. You may wish to cross reference associated activities included in this table to section B1.1.</p> <p>3. Regarding point no. 8, details on waste disposal arrangements shall be provided once these are available but prior to the issue of the permit for public consultation.</p> <p>4. Regarding point 14 (which will be further discussed later on in the application), kindly confirm how a coordination system with other operators on site is in place so as to ensure that ELVs for discharges to sea (including temperature are not exceeded) when operating all plant on site.</p> <p>5. Temporary waste storage area and any chemical storage shall also be provided on plan and briefly described in this section (possibly through cross referencing with table). Details on</p>				<p>1. This table describes the associated activities listed in section B1.1</p> <p>2. Agreed and included</p> <p>3. Indicative arrangements are given in section B3.1.2. Final arrangements will be confirmed once formal contracts are in place.</p> <p>4. The CCGT has a separate cooling water outfall up to the mixing basin downstream of the seal weir. Manual monitor prior to mix with other discharges shall be carried out.</p> <p>5. Chemical storage areas are located on drawings 00066 and 00067.</p>		<p>the bund.</p> <p>BOG compressors. All effluent (boiler blow down) will be treated (neutralised) prior to being routed to the effluent storage tanks for disposal via barge. There will be no discharge to sea.</p> <p>All tanks will have full secondary bunding and fill points will be within these bunds.</p> <p>1. Updated</p> <p>2. Cross referenced</p>			<p>value. This polishing unit will require replacement of the activated carbon filtering media and the resin beds in a regular basis. The regeneration and disposal activities won't be conducted on-site.</p> <p>1. No</p> <p>2. No</p> <p>3. No</p> <p>4. -</p> <p>2. Drawing submitted and bunding capacity tables added to text.</p>	<p>Table at end of section</p> <p>1. -</p> <p>2. -</p> <p>3. -</p> <p>4. -</p>	<p>1.</p> <p>2.</p> <p>3.</p> <p>4.</p> <p>5. This has been updated.</p>				

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	<p>capacity and methods of storage and containment shall be provided in the relevant upcoming sections.</p> <p>6. Kindly also clarify whether any other operator will be storing any waste, raw material or chemicals on behalf of ElectroGas.</p> <p>7. Operator is to note that the BAT-AELs in the proposed LCP Bref are as follows:</p> <p>NO_x: 10-25 mg/Nm³</p> <p>CO 1-15 mg/Nm³</p> <p>Also, kindly note that the IED specifies that the NO_x and CO emission limit values set out (50mg/Nm³ and 100mg/Nm³ respectively), apply above 70% generating load. In view that it is being stated that CO emission levels will not increase at loads lower than 70%, permit</p>				<p>6. Discussions are ongoing with Enemalta to possible storage sorted solid waste in the existing area South of the CCGT where Enemalta currently have their waster storage area.</p> <p>7. Noted.</p>		<p>confirm parameters to be monitored to ensure that discharge levels at outfall can be traced back to ElectroGas</p> <p>As at 26_01_15 - As a point of clarification. Parameters currently listed in IPPC permit will need to be monitored</p> <p>5. Drawings 66 and 67 to be provided. Details on capacity and methods of storage and containment shall be provided in the relevant upcoming sections</p> <p>As at 26_01_15 - submission of drawings has been noted. Kindly address earlier comments on details of containment. Drawings mentioned do not include waste storage areas for all waste listed in the waste section</p> <p>6. Noted. MEPA awaits confirmation</p>	<p>3. Submitted</p> <p>4. Assume this will be set out in new IPPC permit</p> <p>5. Drawings updated</p> <p>6. There will</p>		<p>4. Noted.</p> <p>5. Drawings 66 and 67 have not been resubmitted to determine whether the waste storage areas for all waste listed in the section have been addressed.</p> <p>6. Kindly provide details on the location of the waste management area and clearly label area</p>		<p>5. Section 5 regarding <i>the associated activities of fuel handling and storage in the FSU</i> is to be updated so as to reflect the two operational phases of the FSU.</p> <p>6. Details regarding waste management area are to be provided once these are confirmed with Enemalta.</p>	<p>6. Discussions are ongoing with Enemalta</p> <p>7.</p> <p>8.</p>	<p>6. Noted. ERA is to be updated accordingly.</p> <p>Section 7 to 9 is noted.</p>	6. Agreed	

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	conditions in this regard will be included in the eventual variation. SCR may need to be considered given that there may be issues related to local air quality.						7. Noted.	be separate areas of waste storage for EGM and Enemalta. EGM will not be sharing areas with other site operators.		on plans. Details of bunding in the area to contain any spillages of wastes stored in the area are to be provided. 7. Noted. 8. With regards to point 7 in the table kindly indicate why the sentence: <i>The Natural Gas filters in the D3 gas receiving station will be multicyclone coalescing type filters. Minimal particle waste is expected from these filters due to the relatively clean form</i>	1. Noted 2. Closed 3. Closed 4. Closed	7. Noted 8. Noted 9. Noted	9.			

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										<p><i>of NG that the LNG process produces” has been removed.</i></p> <p>9. Kindly note that this table is to be updated with any directly associated activities which will be carried out in view that the FSU will retain its propulsion. Kindly provide confirmation of the fuel which shall be used for running of the propulsion engines. Should multiple fuels be used, kindly provide the ratio of fuel used. Kindly note that the burning of</p>	<p>5. Drawings submitted</p> <p>6. Refer to for drawing : ENEM-URS-FS-00-DR-ME-00068</p> <p>7. Noted.</p>					

Section	MEPA Comments 18 September 2015 – based on submissions on 11 August 2015	Applicant’s response 8 October 2015	D M	MEPA Comments 19 October 2015 (update on 18 September 2015 review) based on submissions of parts A and B3 to B9 on 8 October 2015	Reply from ElectroGas Malta Ltd – 17 th December 2015 for Parts A and B1, and 18 th January 2016 for Parts B2 to B9	D M	MEPA Comments dated 18 th December for parts A and B1 and comments dated 18 th January for Parts B2-B9	Applicant 1s response submitted on 21/03/16 and 25/03/16	D M	MEPA Comments 6 April 2016	Applicant1s response submitted on 9, 18 & 26 May2016	ERA comments 31 May 2016	Applicants Response June 2016	ERA comments 10 June 2016	Applicant response 14 June 2016	ERA Comments 15 June 2016
										boil off gas in the main engines is to be included as a DAA.	8. This was removed erroneously and has been added back. 9. Dual fuel operation is only possible at higher boiler loads, when the FSU sails off from the jetty. The exact fuel ratio shall depend on the BOG generation rate which varies with LNG tanks level, weather conditions etc... it's estimated that 70/30% BOG/LSMD O gross heat input basis fraction is plausible.					

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B1.3	Noted	-	✓	-	-	✓	-		✓	-						
B1.4 B1.4.1	<p>Submissions are noted. Kindly provide copies of the documents referenced in this section and reference such annexes in the text of this section.</p> <p>Kindly also make reference to the site report prepared by Enemalta including ground investigations carried out. Kindly provide information on how such a report will be extended for the area covered by the ElectroGas site paying particular regard to obligations under Regulations 9(3) and 16(2) of the Industrial Emissions (IPPC) Regulations and “communication from Commission - European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C 136/03)”. </p> <p>Land investigations carried out in order to characterise the waste submitted as part of different works method statements may be</p>	Response not yet provided		See Comments dated 18 September 2015	<p>These are confidential SI reports and as such will not be included for the public domain, but will never the less be included as an appendices to this submission..</p> <p>This is already referenced.</p> <p>There is no ground water aquafer below the facility and as such EGM do not see the need for a ground water risk assessment.</p>	*	<p>Noted, these must nonetheless be submitted to the Authority for review. MEPA and the operator will then discuss how the issue of public domain will be addressed.</p> <p>Kindly also make reference to the site report prepared by Enemalta including ground investigations carried out. Kindly provide information on how such a report will be extended for the area covered by the ElectroGas site paying particular regard to obligations under Regulations 9(3) and 16(2) of the Industrial Emissions (IPPC) Regulations and “communication from Commission - European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C 136/03)”. </p> <p>Land investigations carried out in order to characterise the waste submitted as part of</p>	Documents included in submission.	✓	Information requested by MEPA in previous comments is still pending.	Document updated to take into account comments.	Noted. However, the documents referred to in Appendix A of B10401 have not been included. Kindly submit a plan which shows the locations of the sampling points carried out by both Enemalta on the areas to be operated by Electrogas and the locations of sampling points carried out by Electrogas as part of the construction phase.	Appendix A included. Drg ENEM-URS-00-DR-ME-00114 showing additional monitoring points has been included.	Appendix A is noted. Drawing is to be amended so as to include the exact sampling locations carried out by Enemalta.	Drg ENEM-URS-00-DR-ME-00114 updated	Noted. Kindly note that as part of the operational permit land and ground water monitoring additional sampling locations to those carried out by Enemalta as part of their risk assessment may have to be carried out . In this regard a sampling plan for inclusion of these additional sampling locations may be requested as part of the IPPC permit.

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	included as part of the final investigation plan. The land and groundwater risk assessment, the baseline report and the monitoring strategy (or timeframe for their submission) shall be submitted to the Authority prior to the commencement of the public consultation.						different works method statements may be included as part of the final investigation plan. The land and groundwater risk assessment, the baseline report and the monitoring strategy (or timeframe for their submission) shall be submitted to the Authority prior to the commencement of the public consultation.					operational permit land and ground water monitoring additional sampling locations to those carried out by Enemalta as part of their risk assessment may have to be carried out . In this regard a sampling plan for inclusion of these additional sampling locations may be requested as part of the IPPC permit.				
B1. 4.2	Noted.	-	✓	-	-	✓	-		✓	-						
B1. 4.3	Noted.	-	✓	-	-	✓	-		✓	-						
B2 – Your Proposed Techniques																
B2. 1	Noted. Interim procedures to be adopted until ISO 14001 certification is achieved are to be submitted to the Authority. Timeframes for achievement of ISO 14001 will also be	Response not yet provided	✗	See Comments dated 18 September 2015	The EMS plans will be completed and plan to achieve ISO 14001 within a year of achieving commercial operation of the facilities.	✓	Interim procedures to be adopted until ISO 14001 certification is achieved are to be submitted to the Authority. Timeframes for achievement of ISO 14001 will also be required prior to the decision process for this		✓	Noted.	Noted	Noted. The one year for achievement of ISO shall commence upon commencement of operation. This period	Agreed, text modified to state within one year of achieving open cycle commercial operation.	Noted.		

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	required prior to the commencement of the consultation process for this variation.						variation. As at 01.02.16, document has been noted. However, kindly note that the first section of this document is related to the construction management plan rather than the EMS which is required during operation of the plant.					includes the 6 months operating in open cycle				
B2.2 B2.2.1	B 02.02.01 1. Kindly ensure that drawing numbers reference in the form and in the text are the same as the title of the attachments and the drawing numbers “printed” on the drawings. B 02.02.01 – LNG facility 1. Metocean and meteorological study shall be included as an annex and referenced in this section.	Response not yet provided		See Comments dated 18 September 2015	1. Noted and updated 1. These details have now been finalised and are included in the updated MARIN report which will be submitted by through Enemalta. The reference will be updated and the report referenced as an annex.	×	B 02.02.01 1. Drawing names need to be amended B 02.02.01 – LNG terminal and storage facility 1. MEPA awaits submission of MARIN report for review.	1. Amended 1. Submitted	✓	B 020201 1. Drawing name amended. B 020201 – LNG terminal and storage facility 1. MARIN report submitted on 15 February 2016. As per discussions the MARIN report is to be updated to include the storm mooring once the report becomes	1. Closed 1. As agreed during the meetings with the COMAH Safety Advisor, since the storm moorings will not be installed until six to twelve months after the FSU arrives, the RA for the FSU on Storm	1. – B 020201 – LNG terminal and storage facility 1. Noted	1. 1.	1. LNG Terminal and Storage Facility 1. – 2. – 3. – 4. – 5. –		

Section	MEPA Comments 18 September 2015 – based on submissions on 11 August 2015	Applicant's response 8 October 2015	D M	MEPA Comments 19 October 2015 (update on 18 September 2015 review) based on submissions of parts A and B3 to B9 on 8 October 2015	Reply from ElectroGas Malta Ltd – 17 th December 2015 for Parts A and B1, and 18 th January 2016 for Parts B2 to B9	D M	MEPA Comments dated 18 th December for parts A and B1 and comments dated 18 th January for Parts B2-B9	Applicant 1s response submitted on 21/03/16 and 25/03/16	D M	MEPA Comments 6 April 2016	Applicant1s response submitted on 9, 18 & 26 May2016	ERA comments 31 May 2016	Applicants Response June 2016	ERA comments 10 June 2016	Applicant response 14 June 2016	ERA Comments 15 June 2016
	<p>2. Drawing 47067567 - E0 - 00 - DR - ME - 00052 (FSU details) has not been submitted with this application. Kindly submit at the earliest.</p> <p>3. “safe distance” of the FSU from the jetty during storm water incidents shall be provided. Applicant shall review past meteorological data and extrapolate the incidence and duration of potential episodes when the FSU would need to be disconnected.</p>				<p>2. Drawing included and embedded below. Note drawing number and updated references ENEM-URs-FS-00—DR-ME-00052</p> <p>3. This is circa 70m. This is included in the referenced and appended Marin/Arcadis report. The storm mooring operation is expected once or twice per year for a couple of days duration for each occurrence.</p>		<p>2. Document submission has been noted. further comments regarding FSU mooring arrangements may be forthcoming once consultation with TM and COMAH is carried out</p> <p>3. MEPA awaits submission of MARIN report for review. Nonetheless, kindly amend application document with this explanation. Kindly confirm that the fuel delivery frequencies shall be as per data submitted in the application.</p>	<p>2. Noted</p> <p>3. Included</p>		<p>available. As agreed this issue may be tackled once an application for variation of the IPPC permit is submitted in order to take into account the immobilisation of the FSU. Further comments on the MARIN report may be submitted at a later date.</p> <p>2. Further comments regarding FSU mooring arrangements may be forthcoming once consultation with TM and COMAH is carried out.</p> <p>3. Submission of MARIN</p>	<p>mooring will follow as a change in the IPPC</p> <p>2. Noted. Please note that we have conditional approval from TM for the storm mooring concept and layout</p> <p>3. Noted</p>	<p>2. Noted</p>	<p>2.</p> <p>3. Noted</p>			

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	<p>4. Information as to the operations possible at DPS 3 and 4 while the FSU is disconnected (during sever storm incidents) shall be provided.</p> <p>5. Point “b.” shall include details on how safety considerations have been included during the choice of the types of hoses to be installed (especially where these have deviated from the original EIA). Further queries may arise following consultation with the COMAH Competent Authority.</p> <p>6. Regarding point “d” kindly provide the rated thermal input of the emergency generator.</p>				<p>4. During disconnection events DPS3 can operate four engines on diesel, ie circa 50% load, however DPS4 will not be in operation.</p> <p>5. Ship to ship transfer was always considered as flexible hoses. These are considered, for short term connections (circa 24hrs) to be industry standard.</p> <p>6. The back-up service generator will rated at 2MW and the emergency generator will be rated at 150kW. The emergency generator will be test for one hour every year and the back p service gernator will run during storm mooring disconnection events, ie circa four days per year.</p>		<p>4. Noted</p> <p>5. Noted, subject to any further queries from the COMAH Competent Authority.</p> <p>6. Point E in this section mentions a main generator (2 MW) and a small backup generator to operate safety systems (150 KW). Other sectios mention gas fired steam boilers to be used during STS transfer. Kindly confirm the amount of boilers, their rated thermal input and expected hrs of operation.</p>	<p>4. Closed</p> <p>5. Noted</p> <p>6. Added refer to new point d)</p>		<p>report noted. Further comments on the report may be requested.</p> <p>4. –</p> <p>5. Further queries from the COMAH CA may ensue.</p> <p>6. NotedD etails on the FSU engines</p>	<p>4.</p> <p>5. Noted</p> <p>6. Please refer to responses to B1.2 above and updated text.</p>	<p>condition.</p> <p>It is now understood that the FSU disconnection is expected 3 times a year.</p> <p>4. –</p> <p>5. Further queries from the COMAH CA may ensue</p> <p>6. Noted. It is now understood that during phase 1, there will be two boilers of 58.5 MWth on the FSU operation at 4.2 MWth during sts transfers</p> <p>during phase 2 the information</p>	<p>4.</p> <p>5.</p> <p>6. There are two boilers rated at 58.5 MWth, however on one will operate during STS at circa 9MWth</p> <p>There are two boilers at 16.25 MWth gross and 14.7 MWth net. This ahs been</p>	<p>6. Noted. Kindly confirm whether this is the maximum energy output required during sts transfer.</p> <p>Further comments regarding the issue of net and gross MWth may persue</p>	<p>7. Yes This will produce sufficient steam to run the BOG compressors required during STS transfers.</p> <p>Noted</p>	<p>7. Noted</p> <p>ERA's input on this issue shall be provided duringthe Regulatory Consultatio</p>

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	7. Point “f” shall				7. This concept has since changed and ICCP will no longer be used, but we will use sacrificial anodes as a more viable alternative. 8. Included.		7. Noted, kindly address in waste section. 8. Noted	7. Added 8. Closed		used for propulsion are to be provided, as requested in previous section. 7. Updated waste section was not provided.	7. Waste section updated and submitted 8. 9. Please refer to response to	is conflicting in view that the table states that there will be two boilers of 14.7 MWth whilst the text mentions 2 16.25 MWth auxiliary boilers. Kindly confirm and amend accordingly. Kindly also confirm whether the FSU backup diesel generator is 4.7 MWth or 2 MWth (as declared in doc 02.06.02.) Kindly amend section accordingly 7. kindly note comment in waste section	clarified in the text. 2MWe and 4.7 MWth 7. 8. 9. Confirmed	following internal discussion. Noted. 7. – 8. – 9. Noted.		n.

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	<p>include details on replacement and maintenance requirements of the ICCP</p> <p>8. Kindly also address comments from section B1.2 relevant to this section.</p>									<p>Therefore addition of this waste cannot be confirmed.</p> <p>8. -</p> <p>9. Regarding the sentence indicating that the boilers will be kept in a 'warm' condition, kindly provide technical details on the thermal capacity of the boilers.</p> <p>10. Regarding the number of sts transfers, kindly provide an explanation as to why the number of visits of the LNGC has increased.</p>	<p>B1.2 above which includes a doc on the FSU operating modes. The main boilers will be only operational during STS or during a disconnection event.</p> <p>10. There will be an LNGC supplying the FSU every six to eight weeks. These transfers will entail an initial transfer of the majority of the cargo and then a second transfer a few days later when sufficient LNG has been transferred to shore to allow for the remain cargo to the FSU.</p>	<p>8. –</p> <p>9. Noted it is now understood that the boilers will only be switched on during STS and disconnection</p> <p>10. Not ed</p> <p>11. Kindl</p>	<p>10.</p> <p>11. Updated. 4.2 Meth is the minimum turndown, the boilers will operate at 9MWth in Phase 1.</p>	<p>10. –</p> <p>11. Noted.</p>		

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					1. Soft copy changed.		02.02.01 – Onshore LNG Regassification Facility	1. Drawin g reference should be 47067567		11. Rega rding the use of the auxiliary boilers during the sts transfers, kindly confirm whether only one boiler at a time will be utilised. 12. Disposal of treated sewage effluent 12km would need to comply with emission limits. This issue shall be further discussed with TM.	11. Only one boiler will be in operation 12. Agreed	y clarify the difference in terms of MW required for STS between Phase 1(utilising the main boilers at 4.2 MW) and Phase 2 (utilising the auxillary boilers at 14.7MW/1 6.25MW) 12. - 13. Rega rding point e kindly add that the boilers will be utilised to consume BOG during disconnecti on 14. Moni toring of boiler blowdown will be required	12. 12. Text updated confirming 14. Agre ed, Permit to stipulate requirement s.	12. 13. Noted. 14. Noted. 15. With regards to point (l) kindly include the reference to sodium phosphate as the boiler feedwater chemical. If another chemical is to be utilised, kindly specify name according.	15. This will be both Sodium Phosphate and the oxygen scavenger Diethylhy droxylami ne as detailed further in section B2.3. Text in item I updated accordingl y	15. Noted

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	<p>B 02.02.01 – Onshore LNG Regasification Facility</p> <p>1. Regarding drawing 2779-90-PG-DR-00010, kindly ensure that name of soft copy is the same and not ENEM-JPA-E2-00-DR-ME-0068.</p> <p>2. Point “c” shall be further expanded to include the projected frequency of the engagement of the NVCC</p>				<p>2. It is not envisage that the NVCC will be used during normal operations, it is for use in an emergency situation only. It is anticipated that yearly testing will be required for a period of less than an hour.</p>		<p>1. Drawing references in this section has not been re submitted (2779-90-PG-DR-00010,)</p> <p>2. Noted, Kindly note that Continuous monitoring of the gas sent to flaring will be required. This includes the following monitoring requirements.:</p> <ul style="list-style-type: none"> • measurements of gas flow and estimations of other parameters (e.g. composition of flow gas, heat content, ratio of assistance, velocity, purge gas flow rate, pollutant emissions (e.g. NOX, CO, hydrocarbons, noise). The recording of flaring events shall included: • the estimated/measured flare gas composition, the estimated/measured flare gas quantity and the duration of operation. <p>This above shall be provided and details included in the relevant</p>	<p>-1022 and has been updated.</p> <p>2.</p>		<p>020201 – Onshore LNG Regasification facility</p> <p>1. Drawing has not been submitted.</p> <p>2. Comment made in previous review is still applicable. In addition, kindly provide details of the capacity of the NVCC.</p>	<p>1. Drawing submitted</p> <p>2. There is no monitoring system in the NVCC. This is not a continuous emission source and it will only be operated under emergency situations to depressurize the system. There is a BOG flow meter in the line to the NVCC which can be used to calculate the CO2 emission released to atmosphere. Three pilot</p>	<p>020201 – Onshore LNG Regasification facility</p> <p>1. Noted</p> <p>2. Kindly note that during flaring episodes continuous measurement of gas flow will be required and an estimation of other parameters (e.g. composition of flow gas, heat content, ratio of assistance, velocity, purge gas</p>	<p>1.</p> <p>2. Post Flow calculation shall be done and text has been updated to suit.</p>	<p>Regasification facility</p> <p>1. –</p> <p>2. Noted. The requirement for submission of such calculations will be included as a permit condition.</p>	<p>2. Agreed</p>	

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	<p>3. In point “e” kindly replace reference to Enemalta with reference to “Delimara 3 Power Generation Ltd.”</p> <p>4. Kindly also address comments from section B1.2 relevant to this section</p>				<p>3. EGM's gas delivery is to Enemalta at this location.</p> <p>4. Addressed</p>		<p>section</p> <p>3. Noted</p> <p>4. Noted</p> <p>5. Kindly confirm that the feature marked as RIP-RAP is the location of the outfall as described in the legend containing the UTM Coordinates (in Document 2779-77-CI-DR-000401) if this is the case kindly amend drawing to label the outfall.</p> <p>6. For the septic tank,</p>	<p>3. Closed</p> <p>4. Closed</p> <p>5. The rip rap indicated is the slope protection in the facility of the outfall. The outfall itself is at the end of the pipe identifies as 48/DN800 TS/0.00487 at the UTM coordinate identified in the table.</p> <p>6. Confirmed. Final details awaited. Please note that the project</p>			<p>lights will be permanently firing to supply required energy input to the main flare in case of emergency. This pilot lights are rated with a gross energy input of 16.3kWth each.</p> <p>3.</p> <p>4.</p> <p>5. Drawing updated</p>	<p>flow rate, pollutant emissions (e.g. NOX, CO, hydrocarbon s, noise). The recording of flaring events shall including estimated/ measured flare gas composition , the estimated/measured flare gas quantity and the duration of episode.</p> <p>Methodology shall be provided</p> <p>3. –</p> <p>4. –</p> <p>5. Noted</p>	<p>3.</p> <p>4.</p> <p>5.</p> <p>6. Agreed</p>	<p>3. –</p> <p>4. –</p> <p>5. –</p> <p>6. –</p>		

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	<p>B 02.02.01 – CCGT Power Plant</p> <p>1. Kindly ensure that name of soft copy of drawing number MT1001-UZ-CLD103-444911146 is the same and not ENEM-SIT-E1-00-DR-CE-00020.</p> <p>2. the following statement is noted in point “a”:</p> <p><i>“The stack emissions during open cycle operation (Gas Turbines_only in operation) will be the same as during CGT operation (HRSG operating) with the exception that the temperature s will be higher and thus the discharge more buoyant.”</i></p>				<p>1. Soft copy name changed</p> <p>2. Noted. Due to the greater buoyancy of the gas discharge the impact on dispersion will be reduced.</p> <p>3. Open cycle operation will be necessary during the initial period (estimated at four to six months) of commissioning the steam cycle and then after that every five years for two weeks during the steam turbine major overhaul.</p> <p>In addition there are a few dispatch conditions that would require one</p>		<p>kindly confirm whether:</p> <ul style="list-style-type: none"> • It is to be constructed in such a manner so as not to allow any leakages or spillages to the surrounding environment, and is designed in such a manner as to safely contain the type of waste that they are designated to store. • Will be appropriately designed to avoid the accumulation of explosive, toxic or corrosive gasses. • The area surrounding the septic tank will be covered with impervious material and laid to fall towards the cesspit. <p>B 02.02.01 – CCGT Power Plant</p> <p>1. Noted.</p> <p>2. Noted. Section to be concluded following outcome of the EIA coordinator's assessment.</p>	<p>Perit will be reviewing this design.</p> <p>1. Closed</p> <p>2. Agreed</p> <p>3. Both main and bypass stacks will have monitoring probes connected to the</p>		<p>6. Previous comment made by MEPA is still applicable since this has not been answered.</p> <p>B 02.02.01 – CCGT Power Plant</p>	<p>6. The sewage will be removed by a licenced contractor. The septic tank will be design as a water retaining structure. The septic tank will be suitably ventilated to avoid the build up of any gasses. The surrounding area will be impermeable and concrete paved to falls.</p> <p>1.</p> <p>2. Noted</p>	<p>6. Noted, once constructed this shall be certified by an independent warranted engineer.</p> <p>B 02.02.01 – CCGT Power Plant</p> <p>1. Noted</p>	<p>1.</p> <p>2. Noted</p> <p>3.</p>	<p>B 02.02.01 – CCGT Power Plant</p> <p>1. –</p> <p>2. –</p> <p>3. –</p>		

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	<p>Permit conditions in this regard will thus be included in the IPPC permit.</p> <p>Impact on air dispersion of pollutants during open cycle mode shall also be described.</p> <p>3. Kindly provide details under which conditions open cycle operation will be necessary and thus, the use of the bypass stacks.</p> <p>4. Earlier draft submissions disclosed 38% efficiency during open cycle mode. Kindly explain whether this is still applicable and if so</p>				<p>or more of the GTs operating in open cycle, however these should also be very infrequent as the plant is considered as a base load plant at full output. The dispatch values (which are not in EGMs remit to effect) that at reference conditions would require one or more GT in open cycle are</p> <ul style="list-style-type: none"> • 157 to 138 MW • 103 to 67 MW • 24 to 48 MW <p>4. This is in line with BAT as the plant is design as a base load plant to operate at or close to maximum output, ie to be permanently run in combined cycle mode, apart for during the five yearly steam cycle overhauls.</p>		<p>3. Noted, kindly note comments on discharge monitoring at bypass stacks in relevant section.</p> <p>4. Later sections mention other instances where the plant operates on open cycle mode. Kindly provide additional information together with relevant BAT comparison (in the LCP section) on open cycle scenarios</p>	<p>CEMS. Text updated to clarify this.</p> <p>4. Updated to clarify that emissions are compliant when GTs are operating between 70% and 100% load, which they always will do, thus in order to meet all dispatch possible dispatch loads (down to</p>		<p>1. –</p> <p>2. MEPA's previous comment is still applicable.</p> <p>3. Noted. Comment re CEMS on bypass stack has been addressed in previous section.</p> <p>4. Noted. BAT comparison s have not</p>	<p>3. Closed</p> <p>4. BAT updated</p>	<p>2. ERA's previous comment is still applicable</p> <p>3. Not ed.</p> <p>4. Kindly note that ELVs as prescribed in the IED need to be achieved in both closed and open cycle</p>	<p>4. Noted</p>	<p>4. –</p>		


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	<p>please explain how this is in line with BAT in section B2.2.4.</p> <p>5. Regarding point “d” kindly confirm whether the thermal capacity of the steam turbine is included in the full thermal rating values provided for the plant (3 X 124.3 MWth).</p> <p>6. Regarding point “e”, kindly confirm whether some overflow system will be present in the feed water system and whether</p>				<p>5. The rated output capacity of 205Mw includes all three GTs and full ST operations.</p> <p>6. There is a blow-down system from the feed water system, as described in point ‘h’. No additional additives other than those described in point ‘i’ will be used.</p> <p>7. No additional dosing of the incoming cooling water will be required other than that applied by Enemalta upstream of the EGM intake point.</p>		<p>5. Noted</p> <p>6. Noted</p> <p>7. Kindly confirm that the monitoring to be carried out prior to connection with the common waste water</p>	<p>70% of one GT as this is the min we can be dispatched at) there are operating cases when we will need to run one or more of the GT in OC mode. Refer to graphical representation in section 3a)</p> <p>5. Closed</p> <p>6. Closed</p> <p>7. The monitoring will be carried</p>		<p>been provided.</p> <p>5. –</p> <p>6. –</p> <p>7. –</p> <p>5. –</p> <p>6. -</p>			<p>5.</p> <p>6.</p> <p>7.</p>	<p>5. –</p> <p>6. –</p> <p>7. –</p> <p>8. Noted</p>		

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	<p>discharge / top up will be required periodically. Kindly also provide details on any additives to be used to prevent corrosion other than those mentioned in point “f”.</p> <p>7. Regarding point “f”, kindly provide information on the types of chemicals to be used for dosing of sea water and the dosage rates based on the demand of the ElectroGas plant. Kindly also provide information on connections with sea water outlets at Enemalta and how various parameters can and will be monitored prior to connection with the common outflow.</p> <p>8. Regarding point “g” kindly confirm whether any additional chemical treatment by ElectroGas will be required in the DM plant. This shall include details on any treatment prior</p>				<p>8. The demin plant is a polishing plant only and will be used should the incoming demin feed from Enemalta not have sufficient quality for the steam cycle. It will consist of activated carbon and mixed media filters to extract parts of copper, iron, silica, organic substances and free irons should it be required.</p>		<p>discharge point will be in line with the parameters in the current IPPC permit. Kindly confirm that reply provided for this section has nothing to do with the dosing mentioned in Drawing ENEM-URS-FS-00-DR-ME-00066</p> <p>8. Noted, kindly note comments in section B 1.2 on wastes arising from the polishing plant process.</p>	<p>out upstream of the common connection point with Enemalta. The parameters as specified in the current IPPC permit can be specified for testing in the EGM permit as required by MEPA.</p> <p>8. The dosing mentioned in Drawing ENEM-URS-FS-00-DR-ME-00066 as for the boiler feedwater and the treatment of the blowdown waste in the neutralisa</p>		<p>7. Noted.</p> <p>8. Waste from the demin water plant is to be also included in the Waste section.</p>	<p>8. Included</p>	<p>7. –</p> <p>8. Neutralisation tank sludges shall be included in waste section</p>	<p>8. No sludge will be generated in neutralisation process.</p>			

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	<p>monitoring regimes in place prior to discharge.</p> <p>10.Regarding point “i” kindly confirm whether ElectroGas or Enemalta will be dosing and monitoring the chemistry of the feed water. The list of reagents to be used shall be provided in the template provided by MEPA on 12th June 2015 which is again being provided at the end of this document (Table 1)</p> <p>11.Regarding point “j” , standards mentioned in earlier sections and in this section must be the same. Kindly amend document accordingly. Operator to note that calibration and certification will be required prior to the commencement of operation during commissioning.</p> <p>12. details on standby diesel generator set shall be provided and location of</p>				<p>11. Standards updated and confirmed. EGM confirm that the CEMS system will be calibrated as part of the commissioning of the system prior to commencement of operations.</p> <p>12. Details of stand by diesel gen set included and location shown on drawing ENEM-URS-FS-00-DR-ME-00066.</p> <p>13. The oil separator shall be GRP construction from FM Environmental (Malta) and shall be model AquaBHDCE5006, Class1 EN-858 and will conform to Environment Agency PPG3 standards. It will discharge into the CCGT storm water system.</p>		<p>11. Kindly refer to comment on requirement of CEMS on both the main stacks and the bypass stacks in section B 1.2. feedback in this regard shall be repeated in this section</p> <p>12. Kindly confirm whether the 800 kW is the thermal rating.</p> <p>13. Noted. Kindly provide location of discharge (including UTM coordinates) reference to a drawing where this can be located</p>	<p>10.The dosing chemicals will be Ammonia (25% solution be vol) and Tri-sodium Phosphate as included in section B.02.03 and added to Table 1 as supplied by MEPA</p> <p>11. Agreed and updated .</p> <p>12. 800 kW is the electrical rating. The thermal rating will be circa 2.M</p>		<p>not been provided.</p> <p>11. Noted .</p> <p>12. Noted .</p> <p>13. Noted. Document MT1001-UZ-CLD103-115172843 has not been provided. Kindly note that</p>	<p>11.</p> <p>12.</p> <p>13. CE Declaration of conformity for the equipment with relevant standards and specification included in the back up information with the submission.</p>	<p>11. Noted</p> <p>12. Noted</p> <p>13. Noted</p>	<p>13.</p> <p>14.</p> <p>15.</p>			

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	<p>associated tank shown on plan</p> <p>13. Details of oil separator pit including standard of construction and location of discharge shall be provided.</p> <p>14. Kindly also address comments from section B1.2 relevant to this section</p>				14. Included		<p>14. Noted. see comments above and any additional comments in section B 1.2</p>	<p>B 2. 4</p> <p>13. The treated effluent from the oil separator will discharge in to the CCGT stormwater r system which will discharge to sea through the existing Enemalta outfall as shown on drawing MT1001-UZ-CLD103-11517284 3 through manhole SW53</p> <p>14. Addressed</p>		<p>certification of the oil separator shall be requested as part of the IPPC permit.</p> <p>14. –</p> <p>15. Drawing ENEM-URS-FS-00-DR-ME-00095 has not been provided with this submission.</p>	<p>14.</p> <p>15. Drawin g include d</p> <p>15. addresse d</p>					
B2. 2.2	B02.02.02 Issues related to odour and noise are not addressed in this section. Kindly provide a brief description and cross reference	Response not yet provided	✖	See Comments dated 18 September 2015	TBC	✖	B02.02.02 Issues related to odour and noise are not addressed in this section. Kindly provide a brief description and cross reference with	Noise and odour included briefly and referenced	✖	B020202 Points 11 and 12 regarding noise are noted. Further details in		B020202 Points 11 and 12 regarding noise are noted. Further details in the				

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	<p>with upcoming sections where the issues will be further expanded (Sections B 3.7 and B 3.9)</p> <p>B02.02.02 – FSU/ LNG Regasification plant</p> <p>1. MEPA notes that the section needs to be updated with the FSU details. These updates will be required prior to commencement of internal consultation and that with consultees. Details shall also include schematic details of the LNG tanks and calculations of containment capacity in relation to the volume to be stored.</p> <p>2. Kindly provide additional information in point “5” explaining why the generation of BOG is not promoted.</p> <p>3. Earlier draft submissions mentioned safety release valves to cater for</p>				<p>1. Updated as required</p> <p>2. The generation of BOG is kept to a minimum firstly so as not to exceed the capacity of the on-shore BOG compressors (this would result in the need to flare excess BOG) but also compressing BOG to 40barg through the on-shore BOG compressor for use in the power plants is less efficient that regasifying the LNG in the IFV skids.</p> <p>3. There are still safety release values on the the tanks, these are a requirement of the safety mitigation measures for the FSU. No the emissions from these are not directed to</p>		<p>upcoming sections where the issues will be further expanded (Sections B 3.7 and B 3.9)</p> <p>B02.02.02 – FSU/ LNG Regasification plant</p> <p>1. Noted.</p> <p>2. Noted.</p> <p>3. Noted. kindly confirm whether such release valves have been considered in the safety studies</p>	<p>to later sections</p> <p>1. Closed</p> <p>2. Yes these are considered in the Safety Report as mitigation against over pressurising of the tanks leading to loss of containment of LNG</p> <p>3. Closed</p>		<p>the respective section may be required.</p> <p>B020202 – FSU/ LNG Regasification plant</p> <p>1. –</p> <p>2. –</p> <p>3. Noted. Further queries from the COMAH CA regarding the safety report may</p>	<p>1.</p> <p>2.</p> <p>3. Noted</p> <p>4.</p>	<p>respective section may be required.</p> <p>B020202 – FSU/ LNG Regasification plant</p> <p>1. –</p> <p>2. –</p> <p>3. Noted. Further queries from the COMAH CA regarding the safety report may be requested</p>	<p>1.</p> <p>2.</p> <p>3. Noted</p> <p>4.</p>	<p>B020202 FSU/LNG regas plant</p> <p>All section is noted.</p>		

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	<p>overpressure. Kindly confirm whether these have been removed and if not whether emissions from these are redirected to the NVCC.</p> <p>4. certification of all transfer lines shall be carried out by an independent warranted engineer prior to commencement of commissioning</p> <p>B02.02.02 – CCGT Power Plant</p> <p>1. Frequency of start-ups and shutdowns are required. More specifically, please provide information as to whether it is projected that D4 will be constantly in operation and ‘switched” off for maintenance periodically. Kindly also provide information as to how the start-up and shutdown periods shall be maintained in accordance with “COMMISSION IMPLEMENTING DECISION</p>				<p>the NVCC.</p> <p>4. Noted. This will be part of Class certification and the LNG certificate required prior to sending LNG to shore.</p> <p>1. The plant is design as base load and thus should operate in combined cycle mode at maximum capacity. Start ups and shut downs will be required for routine maintenance; for the steam cycle this is planned every five years and for each of the gas turbines this is planned every one to two years.</p> <p>Below are typical start-up and shut-down curves for the plant.</p> <div><p>02, CD000501_04.02_A</p></div>		<p>4. Noted.</p> <p>B02.02.02 – CCGT Power Plant</p> <p>1. Submission is noted, however information as to how the start-up and shutdown periods shall be maintained in accordance with “COMMISSION IMPLEMENTING DECISION concerning the determination of start-up and shut-down periods for the purposes of Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions”</p>	<p>1. Can we discuss</p> <p>2. C</p>		<p>be requested.</p> <p>4. –</p> <p>B020202 – CCGT Power Plant</p> <p>1. With regards to the start-up and shut-down periods provided in Appendix B, kindly provide the determinati on of start-up and shut-down as a %of the rated electrical output for both the open cycle and closed cycle. Kindly refer to the Annex in the Commissio n Implementi ng Decision so as</p>	<p>1. This have been inlcude d</p> <p>B02.02.02 – CCGT Power Plant</p> <p>1. Regarding startup curves provided, kindly confirm whether ERA can therefore assume that full startup can be achieved at 16.6 % of the rated electrical output. Kindly provide similar information in terms of shutdown so as to allow ERA to calculate the %</p> <p>2.</p>	<p>4. Not ed</p> <p>1. Confirm ed and shut down curves updated</p> <p>B0202023 – CCGT Power Plant</p> <p>1. Noted. Shut down will thus be considered to start taking place at 23.9% of the electrical output.</p>	<p>1. Agreed</p>	<p>1. Noted</p>		

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	<p>concerning the determination of start-up and shut-down periods for the purposes of Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions”</p> <p>2. Regarding point “5” kindly confirm whether the alarms are both visual and auditory.</p> <p>3. Point “10” shall be further expanded to provide projected emission levels for SOx shall be provided.</p>				<p>2. These are both visual and auditory.</p> <p>3. The concentration of total sulphur in the Natural Gas shall always be lower than 30mg/Nm3 and will on average not be greater than 5mg/Nm3. This sulphur content is then highly diluted with air in the GTs combustion chambers so that the concentration of sulphur in flue gases at the stacks, based on the maximum value above, shall always be lower than 10mg/Nm3 at 15% O2 (dry basis). This value is in line with European Best available technique (BAT) recommendations for gas fired power plants and no further technical measures for abatement of SOx are required. Refer to BAT comparison section B2.2.4</p>		<p>2. Noted.</p> <p>3. Noted. The section may need to be revisited once Air quality studies as part of the EIA are concluded and MEPA receives details on NEC ceiling apportionment by Enemalta plc.</p>	<p>lo se d</p> <p>3. Noted. This section may be revisited depending in the Air quality studies</p>		<p>determine the Discrete processes and Operational Parameters associated with start-up and shut-down.</p> <p>2. –</p> <p>3. As indicated in previous comments, the section may need to be updated once the Air quality studies as part of the EIA are concluded and MEPA. Finalised apportionment of the the NEC ceilings will be submitted to EGM for review once these are submitted by Enemalta.</p>	3. Noted	2. -	3. Noted	2. –	3. Noted	3. The section may need to be updated once the Air quality studies as part of the EIA are concluded and MEPA. Finalised apportionment of the NEC ceiling will be submitted to EGM for review once submission provided by Enemalta is reviewed by ERA


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B2. 2.3	1. Kindly ensure that drawing numbers reference in the form and in the text are the same as the title of the attachments and the drawing numbers “printed” on the drawings.	Response not yet provided	✖	See Comments dated 18 September 2015	Drawing numbers updated on Form B.	✓	Kindly amend drawing numbers.	Drawing files have been updated to ENEM-URS-FS-00-DR-ME-00050 and 00051	✓	Drawings not submitted, therefore it is not possible to check the drawing numbers.	Drawings submitted	Noted, see comments in relevant sections and amend if necessary	Drawings up to date	Noted.		
B2. 2.4	Feedback on BAT comparison shall be provided by MEPA shortly	-	~	See Comments dated 18 September 2015	Note	✖	Kindly note comments for each BREF in associated tables at the end of the document.		✓	Updates requested in the BAT comparison have not been provided.	BAT comparisons updated	Kindly see comments on specific BAT conclusions in attached documentation		Kindly see comments on specific BAT conclusions in attached documentation		BAT comparison shall be finalised as per ERA comments dated 31 May 2016.
B2. 2.5	1. Kindly amend section in line with recent updates of the safety reports. 2. Third row still mentions the use of hard arms whereas previous parts of the application mentions flexible hoses in both ship to ship and ship to shore transfers. Kindly amend section accordingly.	Response not yet provided	✖	See Comments dated 18 September 2015	1. Updated This section is correct however ahs been updated for clarification and split into two sections, one for the STS and BOG to shore the other for LNG to shore. Flexible hoses were looked at as an alternative for the ship to shore LNG transfer, however a hard arm is more proven technology for permanent LNG send out and so is to be adopted for ship to shore transfer of LNG. Hoses are still to be used for StS and BOG to shore transfers.	✓	Noted. Further comments may however ensue following consultation with COMAH competent Authority	Noted	✓	As previously indicated, further comments may ensure following the consultation with the COMAH CA.	Agreed	As previously indicated, further comments may ensure following the consultation with the COMAH CA.	Noted			

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B2.3	1. Document B0203 has not been provided. Kindly confirm whether the document is still the same as the one provided on 11 th November 2014 or submit at the earliest.	Response not yet provided	~	See Comments dated 18 September 2015	1. See updated submission.	✕	1. Document B0203 has not been submitted As at 01.02.16 document has been submitted. The full list of consumables and the respective MSDS are to be updated following commencement of operations. The full list of raw materials shall be provided in the template provided by MEPA on 12 th June 2015 and again on 19 th September 2015 which is again being provided at the end of this document (Table 1) With regards to the list of raw materials listed in document B0203, kindly provide the following: a. Specific chemical composition of the biocides which shall be utilised in the FSU and Regas facility.	1. T a b l e i s c o m p l e t e d	✕	1. As indicated in MEPA's previous review, the full list of consumables and the respective MSDS is to be reconfirmed following commencement of operations. The template (Table 1) provided at the end of the document has not been submitted. With regards to the list of raw materials listed in document B0203 the following comments apply: a. The biocides have been removed from the list on page	1. MSDS docs updated and Table 1 completed. a. Document updated Appendices included.	1. Noted, kindly include details on use of washing products . Kindly also include a column indicating the maximum storage at any one time of each of the items listed. a. Noted	1. As discussed this is domestic washing only and thus as agreed with ERA does not need to be included and has been deleted Noted	1. Noted		

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	<p>2. Appendix A has not been provided. Kindly confirm whether the list of MSDS sheets provided in November 2014 are applicable or submit updated MSDS at the earliest.</p> <p>3. Drawings ENEM ME-00066 and ENEM ME-00066 have not been submitted. Kindly confirm whether drawings submitted on 11th November 2014 are still applicable.</p> <p>4. Kindly provide updated list of raw materials in the table provided by MEPA on 12th June 2015 which is again being provided at the end of this</p>				<p>2. This is still as previously submitted. Final list will be submitted by O&M team once sourced locally.</p> <p>3. These have been updated and included in latest submission.</p> <p>4. Note that the biocides currently used to treat the CW system are being supplied and dosed by Enemalta. This operational arrangement will continue, EGM do not have any say over the type of biocides being used.</p>		<p>b. Submission of the final bund containment capacity for all chemical tanks. If these are not available at the moment, kindly submit timeframe for submission of such information.</p> <p>2. Noted. Please note comment in point 1 above.</p> <p>3. Noted. Should additional chemicals be identified following mobilisation of O & M teams, plans shall be amended to address such inclusions. Nonetheless, drawings will need to be amended to include location codes in table 1 at the end of the document.</p> <p>4. Noted. Please see comments above</p>	<p>a) Biocides are no longer required and have been removed from the Raw Material table</p> <p>b) These will be provided during the commissioning period prior to commercial operation (second half of 2016).</p> <p>2. Noted</p> <p>3. Agreed</p>		<p>1 of the document, however they are still present in the description provided thereafter. Kindly amend document accordingly.</p> <p>b. Noted.</p> <p>c. Appendix A and B have not been provided.</p> <p>2. -.</p> <p>3. -</p> <p>4. -</p>	<p>2. Ds</p> <p>3.</p> <p>4.</p>	<p>b. Kindly amend list provided with bund capacities at all parts of the installation</p> <p>2. Kindly confirm whether this is the final list</p> <p>3. Kindly confirm whether this is the final list</p> <p>4. Kindly note comment 1 above</p>	<p>Refer to section 1.2 for bund capacities.</p> <p>2. Yes, although note alternative suppliers may be found during the 18 years of operation.</p> <p>3. Confirmed</p> <p>4. Refer to response to 1 above</p>	<p>b. Noted</p> <p>2. Noted</p> <p>3. Noted</p> <p>4. Noted</p>		

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	document (Table 1).. Storage for “day tanks/ interim storage areas” are also to be provided. Different biocide from the one currently used would need a determination of the cumulative impacts in the cooling water effluent.							4. Note								
B2.4	1. With reference to document B01.02 kindly note that Rankine steam cycles utilising F-Gases fall within the	Response not Yet Provided	✕	See Comments dated 18 September 2015	1. F-gases are not used in the Rankine Steam cycle.	✕	As at 01.02.14 kindly note that document has been submitted. 1. Noted	1. Closed	✓	1. –	1.	1. –	1.	1. –		

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	<p>scope of the new F-Gas Regulation. Kindly clarify whether F-gas use or otherwise in such a system.</p> <p>2. Details of equipment containing more than 3kg F-gas will be required at a later design stage. The GWP of each piece of equipment containing F-Gas shall also be provided so as to enable the inclusion of any required inspection schedules in the permit. A form specific for this section is being included at the end of this document (Table 2).</p> <p>3. The requirement for a leak detection system in the switchgear room will need to be explored in line with EC 517/2014.</p>				<p>2. Noted, details can be proved at a later date as required.</p> <p>3. Noted</p>		<p>2. MEPA will require these details before the permit is drafted in view that any such equipment needs to be registered under relevant legislation.</p> <p>3. Document B0204 must include details on all equipment and leak detection systems to be included on site</p>	<p>2. Table 2 included, note F-gas is only required for the CCGT GIS equipment</p> <p>3. No gas detection is installed in the GIS building. Gas leakage is detected by system pressure monitoring on the low pressure scenario if the circuit breakers are open</p>		<p>2. Noted</p> <p>3. With regards to the equipment specified in the table, kindly clarify why the regas firefighting foam has been removed. Kindly specify what shall be used instead.</p>	<p>2.</p> <p>3. Fire fighting foam will be used in the regas plant. Please refer to raw material sections for relevant information and the MSDS.</p>	<p>2. –</p> <p>3. Table shall be completed prior to commencement of statutory consultation</p> <p>4. Requirement for a leak detection system may be further expanded following statutory consultation</p>	<p>2.</p> <p>3. Table updatede.</p> <p>4. Noted</p>	<p>2. –</p> <p>3. Noted.</p> <p>4. –</p>		
B2.5	Details of frequency of maintenance are to be provided prior to the issue of the drafting of permit. Conditions regarding regular maintenance and	Response not Yet Provided	×	See Comments dated 18 September 2015	<p>An estimate of frequency of major items of equipment is as follows;</p> <ul style="list-style-type: none"> Steam Turbine every five years Gas Turbine every 	×	As at 01.02.16, the document has been submitted. Maintenance programme for the FSU, the Regas and CCGT are to be submitted once the	<p>Agreed</p> <p>Hull Cleaning details have been included. We</p>	✓	<p>As previously indicated, the Maintenance programme for the</p>	Noted	Noted, see previous comment	Templates will be provided.	To be submitted prior to the public hearing.	Agreed	

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	record-keeping will be part of any IPPC permit that is issued.				<p>one to two years</p> <ul style="list-style-type: none"> • Single Moss tank on FSU every year • FSU hull inspection every three to four years • MCW pumps every two/three years • IFV every one to two years • NVCC every 2/3 months • EDG test every month. 		<p>O&M team are in place. Kindly also note that templates for maintenance records to be kept will need to be provided prior to the public hearing allowing enough time for MEPA to review and provide feedback. Estimate provided is noted. Kindly provide information on hull cleaning operations and frequency.</p>	<p>confirm that the paint coatings are TBT free in accordance with the MSDSs and Certificates below.</p>  <p>FSU Hull Painting details.zip</p>		<p>FSU, the Regas and CCGT are to be submitted once the O&M team are in place. Kindly also note that templates for maintenance records to be kept will need to be provided prior to the public hearing allowing enough time for MEPA to review and provide feedback.</p> <p>Updates regarding the hull cleaning inspection are noted. Kindly note that MEPA will have to issue a hull cleaning permit prior to each cleaning operation as per normal MEPA procedures</p>			<p>Noted; ERA to note that hull cleaning is a Class requirement for not dry docking. All ERA permits will be in place before cleaning commences.</p>			

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										currently in place for such activity.						
B2. 6 B2. 6.1	B02.02.06 1. Kindly confirm that the electricity consumption quoted (11.5MWe) is a yearly amount for each of the B02.02.06 – FSU – 1.5 MWe 1. Kindly provide details on the energy consumption in of the on board diesel generator unless this has already been included.	Response not Yet Provided	✖	See Comments dated 18 September 2015	1. This is the average consumption over the year, there will be peaks higher than this, ie during start up and shut down, starting of large motors (ie second BOG compressor) 2. The onboard diesel gen is rated at 2MW, but this will only be used in case of a failure of the ship to shore power connection or in a disconnection event. The CCGT emergency	✖	Kindly confirm that apart from the main generating plant, the following are the only additional combustion plants present on the ElectroGas site: 1. FSU on board auxiliary diesel generator (2MW th) 2. FSU on board emergency generator (150 kwth) 3. Regas emergency generator (kindly provide thermal rating) 4. CCGT emergency diesel generator (0.8 MWth) This is in view that earlier sections mention boilers on the FSU used during STS transfers. If these are present kindly include rated thermal input for such plant	✓	1. Confirm ation of the following is still pending: a. Therma l rating of the Regas emerge ncy generat or b. Confir mation whether the 800kW EDG is thermal capacity . 2. The number of auxiliary steam generators on site is to be specified in	1. Thermal ratings of the EDGs are: 740kWth Regas 2.2MWth CCGT 2. Included 3. Included	-Kindly confirm that the following is an exhaustive list of additional plant on site: <u>FSU – mobilised</u> • 2 X 58.5 MWth • EMGe n -0.45 MWth <u>FSU – immobile</u> • 2 X 14.7 MWth / 16.25 MWth EGM kindly confirm • Em gen – 2 MWth/ 4.7 MWth	Refer to table in section B2.1 14.7MWth net (16.25MWt h gross) Service Diesel Gen is 4.7MWth (2.0MWe)	Noted.			

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	<p>B02.02.06 – CCGT – 6 MWe</p> <p>1. Kindly provide details on the energy consumption of the diesel generator unless this has already been included.</p>				diesel gen is rated at 0.8MW					<p>the section, and as previously requested in above sections.</p> <p>3. Thermal rating of the boilers on the FSU used during the mobilisation phase is to be provided.</p>		<p>EGM kindly confirm</p> <ul style="list-style-type: none"> • EMGen -0.45 MWth <p>Regas</p> <ul style="list-style-type: none"> • EmGen – 0.5Mw th <p>GRS (D3 only)</p> <ul style="list-style-type: none"> • 2X 420 KWth <p>CCGT</p> <ul style="list-style-type: none"> • EmGen – 2 MWth 	<p>Confirmed</p> <p>2.4 MWth</p>			
B2.6.2	Noted	-	✓	-	-	✓	-		✓	-		-				
B2.7	Noted	-	✓	-	-	✓	-		✓	-		-				
B2.8	Comments will be forthcoming once the submission is reviewed by the COMAH competent Authority and official feedback is received by MEPA following consultation rounds	Response not Yet Provided	~	See Comments dated 18 September 2015	Noted, comments awaited.	~	See Comments dated 18 September 2015	Note that the EGM SR has been reviewed and subsequently updated and resubmitted; current version is revision 04.	~	Comments will be forthcoming once the submission is reviewed by the COMAH competent Authority and official feedback is received	Agreed	Comments will be forthcoming once the submission is reviewed by the COMAH competent Authority and official feedback is received by MEPA following	Noted	Comments will be forthcoming once the submission is reviewed by the COMAH competent Authority and official feedback is received	Noted	

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										by MEPA following consultation rounds		consultation rounds		by MEPA following consultation rounds		
B2.9	Detailed information will be required prior to commencement of operations or as prescribed by MEPA or its consultees. Please also indicate whether the following will also be included in staff training: 1. Handling of new raw materials and new waste. 2. Updates to the emergency plan 3. Minimum qualification courses (F-Gas SF6) 4. EMS and procedures	Response not Yet Provided	✖	See Comments dated 18 September 2015	Noted, training will be carried out by equipment vendor prior to commercial operation. The following can also be included in the relevant staff training as applicable; 1. Handling of new raw materials and new waste. 2. Updates to the emergency plan 3. Minimum qualification courses (F-Gas SF6) 4. EMS and procedures	✓	Noted. An employee training programme shall be provided prior to commencement of operations.	Agreed, as stated in the text this will be up and running prior to full commercial operations of the facility	✓	-		Noted	Noted	-		
B2.10	Noted. A timeframe for the submission of the cessation plan will be agreed upon by MEPA and ElectroGas during the drafting of the permit conditions. This will take into account the findings of the land and groundwater risk assessment, baseline report and	-	✓	-	-	✓	-		✓	Kindly amend attachment number in line with the document name in the application.	Amended	Noted	Noted	-		

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	monitoring strategy as discussed earlier.															
B2. 11	While MEPA understands that ElectroGas shall be solely responsible for the operation of the D4 plant, kindly include information of synergies between operators especially in terms of provision of services to one another and agreements in place where activities shall be carried out jointly. This section shall be further augmented by specific drawings showing solely the tie in points with other operators (both where they will provide the service [eg. Cooling water from Enemalta] and where Electrogas shall be providing a service [eg. gas to D3PG]). This shall address issues related to waste, noise, sewerage, emissions and safety amongst others.	Response not Yet Provided	✱	See Comments dated 18 September 2015	Service interaction with Enemalta added to this section, and reference made to drawing 47067367-00019 which lists interface with Enemalta is made.	✱	<p>1. Kindly amend attachment number in line with name in application</p> <p>2. Kindly note that DPS is a multi operator installation in view of technical connections present. Kindly amend document accordingly.</p> <p>3. Specific comments on TIE-in points with other operators shall be discussed in our next scheduled meeting.</p>	<p>1. 1Amme nded to ENEM-URS-FS-00-DR-ME-00095 External Tie in points</p> <p>2. Updated</p> <p>3. Tie in point table updated as per discussions</p>	✱	<p>1. Attachment has not been submitted. .</p> <p>2. With respect to the statement made regarding multi-operators kindly refer to previous MEPA comment and amend section accordingly .</p> <p>3. Tie-in points to be verified once the tie-in point drawing is submitted.</p>	<p>1. Submitted</p> <p>2. Updated</p> <p>3. Not ed</p>	<p>1. Not ed</p> <p>2. Kindly amend document as requested.</p> <p>3. Table and attachment shall be amended as per meeting held on 27/05/16</p>	<p>1. Noted</p> <p>2. The text has been updated to acknowledge that the facility will be operated within a multi-operator site.</p> <p>3. Table updated based on meeting of the 27/05/16</p>	<p>1. –</p> <p>2. The sentence “This will not be a multi operator installation ” is to be removed from the text. The EGM facility will be operated within a multi-operator installation.</p> <p>3. Noted</p>	<p>2. Deleted</p>	<p>2. Noted</p>

Form B3 to B8


Section	D M	MEPA Comments 18 September 2015 – based on submissions on 11 August 2015	Applicant’s response 8 October 2015	D M	MEPA Comments 19 October 2015 (update on 18 September 2015 review) based on submissions of parts A and B3 to B9 on 8 October 2015	Reply from ElectroGas Malta Ltd – 17 th December 2015 for Parts A and B1, and 18 th January 2016 for Parts B2 to B9	D M	MEPA Comments dated 18 th December for parts A and B1 and comments dated 18 th January for Parts B2- B9	Applicant1s response submitted on 21/03/16 and 25/03/16	D M	MEPA Comments 6 April 2016	Applicant1s response submitted on 9, 18 & 26 May2016	ERA comments 31 May 2016	Applicants Response June 2016	ERA comments June 2016	Applicant response 14 th June 2016	ERA Comment s 15 June 2016
B3 - Your proposed emissions																	
B3.1.1,	×	Not Submitted	See Form	×	Operational phase – CCGT plant 1. Details of ultimate disposal location are to be submitted prior to the commencement of public consultation. Wherever export is identified as the treatment route, please give more information regarding the treatment method and, if available at this stage, the name and address of the licensed facility taking the waste. The first table in the section titles “Operational phase” updated accordingly. 2. Kindly include oily rags in this section including EWC code and	1. Final treatm ent locatio ns will be confir med when O&M team have mobili sed 2. Added	×	Operational phase – CCGT plant 1. Noted. details will need to be submitted and confirmed in advance of the board hearing 2. Noted 3. Noted.		×	Document 030301 has not been submitted 1. As previously indicated the details of the final treatment locations will need to be submitted and confirmed prior to the decision on the permit. 2. – 3.	1. Noted 2. Closed 3. In addition once every three to five years the filter	Operational phase CCGT plant 1. Kindly provide a date by when information will be submitted. 2. – 3. Kindly provide	1. Prior to hot commissioni ng circa end of August 2016 2. 3. Included: 19/08/06, 19/09/05 and	Operational phase CCGT plant 1. Noted. 2. – 3. Kindly clarify why the waste resins have been classified	3. Upon review the waste resin from the mixed bed filters should be	3. As agreed during the meeting held with AECOM on 15 June



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					ultimate disposal location. Kindly also include oily water from separators and the method of disposal. This will be further addressed in the section related to marine discharges. 3. Any waste derived from additional polishing of DM water shall be included in this section.	3.Demin water will be produced and supplied from the existing Enemalta demin plant. Additional polishing of this waster made need to be carried out for the CCGT steam system. This will give additional 'brine' during backwashing of filters, which will be neutralised prior to discharge. Refer to CCGT Water Balance Diagram MT1001-6000-MFB102-444910804		4. Regarding HRSG Blowdown (EWC 10 01 22* kindly confirm any treatment prior to discharge to sea. Tables in subsequent sections refer to this waste as "HRSG drainage water" kindly amend sections as necessary 5. Kindly confirm whether any WEEE (eg.switchgear) will be generated on site together with associated wastes (eg. SF 6)			4. To check whether wastes from demin water plant have been included once document is provided. 5. Regarding HRSG Blowdown (EWC 10 01 22* kindly confirm any treatment prior to discharge to sea. Tables in subsequent sections refer to this waste as "HRSG drainage water"	medium will need to be changed and the waste resin from the mixed bed and activated carbon filters will be disposed of through our hazardous waste disposal route. 4. The blowdown will be sent to the neutralisation pit for treatment prior to discharge.. Refer to MT1001-6000-MFB102-444910804 5. There may be the occasional broken PC or similar, however it is not anticipated that routine maintenance and operation will generate significant amounts of	details including EWC code of the filter medium, waste resins, activated C filter. These wastes are to be included in application document. 4. Noted. 5. Noted. Records regarding disposal of such wastes will be kept and reported to the Authority as part of	19/01/10 4. 5. Agreed and text updated to suit.	with both a hazardous code 19 08 06* and the non hazardous code 19 09 05. is a hazardous waste code. The waste code 19 01 10 does not deem to be fit for the carbon filter. Alternative codes in the 19 09 chapter are deemed more appropriate. 4. Noted 5. Noted.	EWC code 19 09 06 and from the activated carbon filters 19 09 04. The table ahs been updated accordingly .	2016, the waste resin from the mixed bed filters shall be given the code 190905. Table is to be updated accordingly. The EWC code for the activated carbon filter is noted.

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								Operational phase – FSU			<p>kindly amend sections as necessary</p> <p>6. Kindly confirm whether any WEEE (eg.switchgear) will be generated on site together with associated wastes (eg. SF 6)</p> <p>Operational phase – FSU</p> <p>This section is to be updated to reflect any wastes arising from the mobilisation of the FSU and the wastewater treatment plant on board the FSU. The comments below are being reiterated in view that no reply from</p>	<p>electrical waste, however that which we do generate due to unexpected equipment failure we will send to an authorised disposal site</p> <p>During the FSU mobilised phase (ie first six to twelve months) there will be once through see water cooling required for the main boilers No chemical are added to this CW system, thus it is sea water in and sea water out..</p>	<p>the Annual Environmental Report.</p> <p>6. With regards to the disposal location indicated for the bilge oil/water from the FSU, kindly note that there is no such permitted site. Kindly provide updated disposal location.</p> <p>Operational phase- FSU</p> <p>Kindly include any sludges generated from the treatment of sewage on board the FSU in table of the the application document.</p>	<p>6. This will be discharge onto a barge licenced for oil.</p> <p>Included.</p>	<p>6. Final disposal location is to be provided.</p> <p>Operational phase – FSU</p> <p>Noted.</p>	<p>6. This is being finalised but is will be at licenced facility licenced for oil disposal.</p>	<p>6. Noted. The information is to be provided prior to the public consultation.</p>

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					<p>1. Any discharges from the LNG tanker will require monitoring and where necessary abatement. Further comments will therefore be forthcoming from the MEPA section in charge of water ant Transport Malta.</p> <p>2. For the sanitary water kindly include details of the cess pit option. Kindly clarify whether the waste will be</p>	<p>1. There will be no discharge of waste from the LNGC during StS operations.</p> <p>2. Regas will have a septic tank and the FSU will</p>		<p>related to marine discharges</p> <p>2. Noted, kindly note that permit numbers for waste contractor will need to be disclosed. Please be informed that no barges are currently permitted for the transport of sewage. Kindly also note that given that local STPs do not have facilities for acceptance of waste water from vessels, arrangement will need to be in place to allow for the transfer of wastewater to road tanker or to the on site cess pit/ sewer connection.</p>			<p>Electrogas has been received.</p> <p>1. Kindly see comments in section related to marine discharges</p> <p>2. Kindly note that permit numbers for waste contractor will need to be disclosed. Please be informed that no barges are currently permitted for the transport of sewage. Kindly also note that local STPs do not have facilities for acceptance of waste water from vessels, arrangement will need to</p>	<p>1. Noted</p> <p>2. An update to this is that the FSU will have a filly operating sewage treatment plant on board that will treat the domestic sewage. The resulting effluent will be stored on the vessel in the grey water holding tank; treated for disposal under MARPOL regulation</p>	<p>1. Kindly see comments related to marine discharges and where necessary amend. Of particular note are the disposal methods and treatment of boiler blow down, grey water, and floor washing. Kindly also note that clean rainwater is not a waste.</p> <p>2. Kindly confirm whether the sewage treatment plant on board the FSU will also be used for treatment of other process effluents generated on board the FSU.</p>	<p>1. Table has been updated to suit. The rainwater and cooling water have been removed as they are not wastes, and the details of the grey water and oily water have been updated to advice that they are stored on boarded and disposed of via barge.</p> <p>2. No only on board generated sewage. The treated water is to MARPOL standards but will not be disposed of as sea. This reference has been removed from the test to clarity.</p>	<p>1. Noted.</p> <p>2. Noted. Kindly see comment in first section regarding disposal of treated effluent via barge.</p>	<p>2. Not ed. The propose d barge supplier will be applyin</p>	<p>2. Noted</p>

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					pumped to a bowser for removal or whether it will be pumped/ connected to the current Enemalta system. Kindly also confirm whether the cess pit will be constructed according to the requirements of LN 106 of 2007 (Activity 43).	have on- board storage which will be pumped to tanker for disposal via a SWT		3. Kindly note that no barges are currently permitted for the			be in place to allow for the transfer of wastewater to road tanker or to the on site cess pit/ sewer connection.	12mile out at sea. The tanks will all have secondary bundling due to the vessel's construction, in the same way as the LNG tanks are fully secondary bundled. Refer to updated section B1.2, extract below	Regarding the disposal of treated effluent, further discussion will have to be carried out with TM to confirm acceptability under MARPOL. All chemicals utilised as part of the wastewater treatment are to be included in the relevant section.. With regards to the waste sludges from the treatment plant kindly note that no waste barges are currently permitted for the transport of sewage sludges. Kindly provide details on how such wastes will be disposed of. With regards to the disposal of the	They are included. Noted, Sewage sludge will only be required to be transported every five years. Updated, to confirm disposal will be via barge		g for the appropri- ate licence.	

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					<p>3. In view that waste from the sanitary water holding tank on the FSU will be removed by mobile transport (bowser) kindly confirm details of contractor prior to commencement of public consultation.</p> <p>4. Waste deriving from the maintenance of the FSU shall also be provided (eg paint,</p>	<p>3. Bezzina have been identified as possible contractor for these works.</p> <p>4. No painting nor antifouling material should be produced as waste, the</p>		<p>transport of sewage</p> <p>4. From your statement MEPA understands that ElectroGas will not be performing any maintenance such as sanding down and repainting of rust spots. Cleaning of growths on the hull and any necessary underwater maintenance for 18 years. Kindly confirm</p>			<p>3. Kindly note that no barges are currently permitted for the transport of sewage</p> <p>4. With regards to the confirmation requested in MEPA's previous review, it has been understood from previous section that hull cleaning will be the only maintenance carried out on the vessel.</p>	 FSU SWP Discuss document.docx <p>3. Barge not required as sewage treated on board..</p> <p>4. Confirmed Hull cleaning will be the only maintenance to be carried out on the outside of the vessel</p> <p>See below Waste Management plan for the FSU</p>	<p>treated effluent, kindly note that there are no barges available locally for the collection, transport and disposal of treated effluent. Thus kindly update the disposal method which is to be used for the disposal of the wastewater. Kindly provide details of expected effluent results achieved by the treatment plant.</p> <p>3. Kindly refer to comment in section above regarding the use of barges mentioned in the FSU SWP discussion</p>	<p>to licenced treatment plant and text updated with details of treated effluent quality form STP.</p> <p>3. Note that it will be treated effluent ad grey water that is transported by barge.</p> <p>4. Comments note and FSU Waste Management plan will be updated prior to the FSU arriving</p> <p>a) Noted, refer to updated section B3.1.3</p>	<p>3. Noted. See comment above regarding final disposal.</p> <p>4. FSU waste management plan is to be updated prior to public consultation.</p> <p>a. See comments in relevant section.</p>	<p>3. Final discharge location will be confirmed once contracts fulling in place, prior to operations .</p> <p>4. Confirmed</p>	<p>3. Noted</p> <p>4. Noted</p>

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					fouling material etc). Details on maintenance operations shall be provided in the relevant section above. This shall include the expected volume of ballast/bilge water within the FSU and the frequency of replacement and thus discharge/dispos al.	FSU is predicted to be CLASS certified for 18years without dry docking. Bilge water included.						 Waste Ma Plan - OPS	document. 4. Reply regarding Hull cleaning is noted. ERA notes the submission of the FSU Waste Management plan. in this regard, kindly provide clarification regarding the following: a. Kindly note that a list of barges permitted for collection of waste is available at <i>http://era.o rg.mt/en/Pa ges/Waste- Carriers.as px</i> Details of the final disposal location for the waste generated on board the FSU are to be provided. b. Section 6 is to be	b) This will be updated to include ERA permit for hull cleaning. c)See attached Certificate below  asbestos free C Armada LNG Med D) Refrigerant oil is the lube oil referred to in the application. e) There is no radioactive waste on the FSU this	b. Noted 		

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								<p>Operational Phase – Regas</p> <p>1. Regarding floor washings potentially contaminated with oil kindly confirm whether these will be treated through the oil separator at the CCGT plant or whether there will be a separate oil separator and discharge point to sea at the Regas location. If the latter is the case kindly confirm that the only discharge point will be through the outfall marked as RIP Rap or whether there will be another point. Kindly also show the location of the interceptor at the Regas plant.</p> <p>2. Kindly include wastes from gas filtration in the list of wastes.</p>			<p>Operational Phase – Regas</p> <p>MEPA's previous comments are still applicable since these have not been addressed.</p>		<p>amended to include reference to ERA permits with respect to hull cleaning.</p> <p>c. Regarding Section 7.3 (table 7.1) kindly provide certification that the vessel is “<i>Asbestos Free</i>”.</p> <p>d. Regarding the liquid hazardous waste in table 7.1 kindly specify what the refrigerant oil is.</p> <p>e. Kindly specify what type of radioactive waste will be generated on the vessel.</p> <p>f. Note 16 in relation to the Yanmar diesel generator on pg 18 refers to a nox</p>	<p>will be deleted.</p> <p>f) The Yamanr diesel gen is existing for the original vessel and it is not to be used during operations of the FSU. This will be updated in the WMP</p> <p>g) Will include in updated revision. However note that the location of the FSU waste management area is included on the drawings submitted as part of this application.</p> <p>h) Noted</p>	<p>g. Noted</p> <p>h. Comments from TM may be submitted as part of Regulatory Consultation .</p> <p>Oeprational Phase – Regas</p> <p>1. Noted</p> <p>Noted.</p>	<p>services diesel generator and EDG.</p> <p>h. Noted</p>	<p>and its emissions profile included in the relevant section.</p>

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												2. Included	<p>exemption. Kindly clarify what is meant by the following sentence: A <i>NOx exemption request for operation in the EU will required to be approved by Transport Malta.</i> g. Diagrams in Appendix G are to be included in the document.</p> <p>h. WMP may need to be approved by TM</p> <p>Operational Phase – Regas</p> <p>1. Noted. Kindly</p>	<p>1. Refer to section B1.2 & B2.3 for bunding details.</p> <p>Floor washings will be internal to buildings and will connect to the cesspit. Text updated to suit.</p> <p>2.</p> <p>3. This has be deleted from the waste table.</p>	<p>2. –</p> <p>3. -</p>		



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													provide details including calculations of the bunded areas. Kindly explain the treatment and disposal method of the floor washings				
B3.1.2			See Form	✕	Document B030102 has not been submitted. This includes the required site plans showing locations for temporary storage prior to removal from	Section updated to current design and reference drawings included.		1. For all wastes which will be stored on site pending removal, kindly include a column in the table submitted showing the maximum storage capacity 2. Waste storage areas shall be clearly marked as such on drawings ENEM-URS-FS-00-DR-			No information related to this section has been submitted. All previous MEPA comments are still applicable.	1. Included	1. Not ed.	1.	1. –		

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					site.			ME-00066/& 67. 3. All wastes listed in section B030101 shall be included in the table submitted in this section. 4. Kindly confirm that the cooling water system oxidants and disinfectants to be utilised during operations have been included in the section related to chemicals and that MSDS sheets have been provided. If not kindly provide these			1. For all wastes which will be stored on site pending removal, kindly include a column in the table submitted showing the maximum storage capacity 2. Waste storage areas shall be clearly marked as such on drawings ENEM-URS- FS-00-DR- ME-00066/& 67. 3. All wastes listed in section B030101 shall be included in the table submitted in this section. 4. Kindly confirm that the cooling water system oxidants and disinfectants to be utilised during	2. Drawings updated showing the in shore waste storage area adjacent to the CCGT and the FSU storage area. 3. Included 4. These are supplied, stored and dosed by Enemalta, upstream of	2. Details of the final waste area are to be provided once discussions are finalised with Enemalta. 3. Not ed. 4. Not ed.	2. Area indicated on drawings, south of CCGT plant , in line with current discussions with Enemalta 3. 4.	2. Noted. 3. 4.		

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								<p>5. Kindly confirm the location of the drain collector for the gas turbine compressor washing.</p> <p>6. Regarding drawing. ENEM-URS-FS-00-DR-ME-00066 kindly explain item 4 in the legend in more detail (closed cooling water equipment)</p>			<p>operations have been included in the section related to chemicals and that MSDS sheets have been provided. If not kindly provide these</p> <p>5. Kindly confirm the location of the drain collector for the gas turbine compressor washing.</p> <p>6. Regarding drawing. ENEM-URS-FS-00-DR-ME-00066 kindly explain item 4 in the legend in more detail (closed cooling water equipment)</p>	<p>the EGM take off point, and thus have been reference but not included in the section regarding on site chemicals as part of this facility.</p> <p>5. Refer to drawing MT1001-UZ-CLD103-445172843 Manhole ref:</p> <p>6. The closed cooling water system will absorb the heat generated in the CCGT main auxiliary systems such as the lube oil system and generator cooling systems. It is an intermediate demin water loop transferring heat from the auxiliary cooling water system so as to avoid any ingress of seawater into the auxiliary CCGT</p>	<p>5. Not ed.</p> <p>6. Not ed.</p>	<p>5.</p> <p>6.</p>	<p>5.</p> <p>6.</p>		

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												systems.					
								7.									
B3.1.3			See Form	✖	<p>The table includes disposal options which are not available in Malta (eg. Boiler wash-down sludge which is intended for disposal at a hazardous landfill).</p> <p>Please use the following link for facilities permitted through an Environmental Permit to accept different types of waste and review options using the EWC codes.</p> <p>http://www.mepa.org.mt/wastemanagementfacilities</p> <p>For IPPC facilities which are permitted to manage waste kindly use the following link:</p> <p>http://www.mepa.org.mt/ippc-applications-installations</p> <p>Following a full review please amend the table in this section and</p>	List of possible Contractors has been added.		<p>Noted. a full comprehensive list will need to be submitted and confirmed in time for the public hearing. Waste contractor for each waste stream will need to be confirmed.</p> <p>When O&M teams commence with the site contractor selection kindly note guidance provided earlier by MEPA</p> <p>Kindly note that Facility “ Enemalta Xewkija district” – EP 53/14 is located in Gozo and is a facility operated by Enemalta for its of distribution centre waste in Gozo. Kindly confirm or remove from the list.</p>		✓	<p>No information related to this section has been submitted. All previous MEPA comments are still applicable.</p> <p>A full comprehensive list will need to be submitted and confirmed in time for the public hearing. Waste contractor for each waste stream will need to be confirmed.</p> <p>When O&M teams commence with the site contractor selection kindly note guidance provided earlier by MEPA</p> <p>Kindly note</p>	List has been updated. The Gozo facilities will not be used.	A full comprehensive list will need to be submitted and confirmed in time for the public hearing. Waste contractor for each waste stream will need to be confirmed.	Noted	<p>Waste carriers shall be confirmed prior to public hearing.</p> <p>Regarding doc 030103 kindly note the following:</p> <p>1. There is no hazardous landfilling facilities available locally. Kindly revise disposal routes which make reference to this disposal location.</p> <p>Regarding the disposal of the sewage collected from regas cesspit, kindly clarify whether this will be</p>	<p>1. Referen ce to local hazardous landfill locations have been deleted.</p> <p>This will be disposed of via bowser to an offsite treatment facility.</p>	<p>1. Reference to local hazardous waste storage area at Ghallis is to be amended in all relevant documents .</p> <p>Noted.</p>

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					<p>submit it to MEPA for review prior to commencement of public consultation.</p> <p>If waste is destined for export, arrangements in place for its transfer shall also be provided (eg. CP numbers, Waste broker permit numbers etc)</p> <p>All waste to be generated during maintenance of FSU shall also be included as requested in earlier sections.</p>						that Facility “ Enemalta Xewkija district” – EP 53/14 is located in Gozo and is a facility operated by Enemalta for its of distribution centre waste in Gozo. Kindly confirm or remove from the list.				<p>disposed of via bowser into the on-site sewerage network or offsite.</p> <p>Regarding the waste barges, kindly provide the full GBR number i.e. include the year of the permit.</p> <p>Regarding the permit type for the barges, kindly note that none of the barges are permitted to collect treated effluent from the FSU sewage treatment plant.</p>	<p>Year of permit added</p> <p>Noted, the barge supplier will be applying for the applicable licence.</p>	Noted.
B3.2	✖	Not Yet Submitted	See Form	✓	Noted	-	✓	-	-	✓	-	-	-	-	-	-	-
B3.3 B3.3.1	✖	Not Yet Submitted	See Form	✖	In this section kindly provide an explanation on arrangement in place with Enemalta to dispose of sewerage generated from the facility.	Updated to include new CCGT connection to the public sewer.	✖			✓	No information related to this section has been submitted. All previous MEPA						

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					Plans shall also be submitted showing tie in points with Enemalta (TP 401 in drawing 47067567-1019 ?)			<p>1. Kindly provide copy of sewer discharge permit application form</p> <p>2. Drawing 47067567-1019 shall be amended to show connection to new sewer connection.</p> <p>3. MEPA permit number for visiting barge shall be provided. Please be informed that no barges are currently permitted for the transport of sewage. Kindly also note that given that local STPs do not have facilities for acceptance of waste water from vessels, arrangement will need to be in place to allow for the transfer of wastewater to road tanker or to the on site cess pit/ sewer connection.</p>			<p>comments are still applicable.</p> <p>1. Kindly provide copy of sewer discharge permit application form</p> <p>2. Drawing 47067567-1019 shall be amended to show connection to new sewer connection.</p> <p>3. MEPA permit number for visiting barge shall be provided. Please be informed that no barges are currently permitted for the transport of sewage. Kindly also note that given that local STPs do not have</p>	<p>1. Please see below</p>  <p>Sewage Discharge Permit</p> <p>2. Drawing has been updated;</p>  <p>ENEM-UR ME-0010</p> <p>3. The FSU has an on board STP which will treat the sewage prior to routing to the on board storage tank. Text has been updated accordingly.</p>	<p>1. Kindly indicate whether WSC has acknowledged the receipt of the application.</p> <p>2. Tie-in points drawing to be resubmitted following meeting between ERA, Enemalta and EGM held on 27 May 2016.</p> <p>3. Document updates are noted. Kindly refer to previous section in relation to pending queries regarding the sewage treatment plant on</p>	<p>1. They have. See below.</p> <p>WSC acknowledged the receipt of the application.</p> <p>2. Drawing updated as discussed</p> <p>3. Section updated with additional information regarding effluent quality. Disposal of waste sludge has been answered in the waste generation section.</p>	<p>1. Kindly provide an acknowledgment from the WSC of the sewer discharge permit application form.</p> <p>2. Noted</p> <p>3. Noted.</p>	<p>1. This was the receipt that we received from WSC, it is their signature at the end of the application</p>	<p>1. As agreed with AECOM during the meeting held on 15 June 2016, the acknowledgment received from WSC is yet to be submitted.</p>

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											facilities for acceptance of waste water from vessels, arrangement will need to be in place to allow for the transfer of wastewater to road tanker or to the on site cess pit/ sewer connection.		board the FSU.				
B3.3.2	✘	Not Yet Submitted	See Form	✘	<p>Section not submitted.</p> <p>Kindly compile this section of the form in view that earlier sections mention a cess pit system.</p> <p>Kindly also confirm whether the cess pit will be constructed according to the requirements of LN 106 of 2007 (Activity 43).</p>	<p>Submitted and installation of septic tank for regasification plant confirmed. Certification will be submitted once the equipment has been installed and commissioned.</p>	✓	<p>Noted. Kindly confirm whether sewage shall be removed from site directly via licenced contractor or pumped to a manhole linked to the new Electrogas public sewer discharge.</p> <p>Kindly confirm whether the septic tank:</p> <ul style="list-style-type: none"> • is to be constructed in such a manner so as not to allow any leakages or spillages to the surrounding environment, and is designed in such a manner as to safely contain the type of waste that they are designated to store. • Will be appropriately designed to avoid the accumulation of explosive, toxic or corrosive gasses. • The area surrounding the septic tank will be covered with impervious 		✓	<p>Certification of the cesspit is to be provided once this has been commissioned . No updates on this section have been provided. Thus MEPA's previous comments are still applicable: Kindly confirm whether sewage shall be removed from site directly via licenced contractor or pumped to a manhole linked to the new Electrogas public sewer discharge.</p>	<p>The septic tank will be emptied by a licenced contractor.</p> <p>Refer to updated section B3.03.01 for updated text confirm the comments below</p> <ul style="list-style-type: none"> • The septic tank will be design as a water retaining structure. 	<p>Kindly provide a timeframe by when the septic tank will be installed and commission ed. Confirmatio n regarding the points made in previous review shall be confirmed as part of the certification. .</p>	<p>Septic tank will be completed and commission ed prior to OC operation</p>	Noted		

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								material and laid to fall towards the cesspit.			Kindly confirm whether the septic tank: <ul style="list-style-type: none">• is to be constructed in such a manner so as not to allow any leakages or spillages to the surrounding environment, and is designed in such a manner as to safely contain the type of waste that they are designated to store.• Will be appropriately designed to avoid the accumulation of explosive, toxic or corrosive gasses.• The area surrounding the septic tank will be covered with impervious material and laid to fall towards the cesspit.	<ul style="list-style-type: none">• The septic tank will be suitably ventilated to avoid the build up of any gasses • The surrounding area will be impermeable and concrete paved to falls.						
B3.3.3	✖	Not Yet Submitted	See Form	✖	Section not submitted	EGM are not discharging into	✖	Kindly provide copy of sewer discharge permit		✓	No updated information	See embedded file in	Kindly submit an	See response to B3.3.1	Kindly refer to comment	We will follow this	Noted.	

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					Kindly provide a copy of Enemalta`s sewer discharge permit.	the Enemalta sewer but down stream directly into the Water Services rising main. Discharge Permit is currently being applied for.		application form			regarding this section has been submitted. MEPA's previous comments are still applicable. Kindly provide copy of sewer discharge permit application form	response to B3.3.1 above. This has been included on the Form B	acknowledg ement of the application from WSC.	item 1 above.	in section above. Also, kindly confirm with WSC that the cesspit collecting sewage from the Regas facilities will also need to be covered by the sewer discharge permit.	up with WSC	
B3.3.4	✖	Not Yet Submitted	See Form	✖	Section not yet submitted. Kindly compile form accordingly after reviewing relevant legislation	Submitted as N/A	✓	Noted		✓	-	-	-				
B3.4	✖	Not Yet Submitted	See Form	✖	1. details on how D4`s discharges shall be monitored prior to connection to the common outflow shall be provided. 2. Drawings	A sampling point will be installed on the 1500mm diameter outfall pipe prior to discharge to the Enemalta mixing basin u/s of the seal pit. Drawing numbers updated and included in the latest submitted	✖	1. Noted. Kindly include replies to comments in earlier sections in terms of discharges 2. Submissions are noted, Kindly confirm		✖	No updated information regarding this section has been submitted. MEPA's previous comments are still applicable. 1. Kindly include replies to comments in earlier sections in terms of	1. Noted 2. Yes this is the outfall.	1. – 2. Noted.	1. 2.	1. – 2. Kindly amend SD02 in drawing ENEM- URS113 and replace “sea water”	2. Drawin g updated	2. Noted. As explained and agreed upon by AECOM during the meeting

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					quoted in this section have not been submitted or could possibly have a different names (attachment and drawing number)	documentat ion. Oil separators shown on drawing MT1001-UZ-CLD103-444911146 reference UBH		that the feature marked as RIP-RAP is the location of the outfall as described in the legend containing the UTM Coordinates (in Document 2779-77-CI-DR-000401) if this is the case kindly amend drawing to label the outfall. 3. Submission is noted. Kindly clarify whether or not there will be a discharge point to sea into Marsaxlokk bay from the regas plant. This is in view that document ENEM URS-EO-DR-ME-ME-00096 shows oily water passing through an interceptor leading to a discharge to sea, whereas document 2779-77-CI-DR-000401 does not include this. Kindly reconfirm and amend drawing / document accordingly			discharges 2. Kindl y confirm that the feature marked as RIP-RAP is the location of the outfall as described in the legend containing the UTM Coordinates (in Document 2779-77-CI-DR-000401) if this is the case kindly amend drawing to label the outfall. 3. Kindl y clarify whether or not there will be a discharge point to sea into Marsaxlokk bay from the regas plant. This is in view that document ENEM URS-EO-DR-ME-ME-00096 shows oily water passing through an interceptor leading to a discharge to	The label Rip-rap is referring to the slope protect at this location. 3. The only discharge from the Regas plant into Marsaxlokk bay is the storm water discussed above. Any potentially oil contaminated areas will be fully bunded. Drawing ENEM-URS-E0-DR-ME-00096 has been updated accordingly.	3. Noted.	3.	with “treated rainwater/ floor washings” Kindly also include description in table03.04-01 in the “comments ” column of the legend. 3. –	Note that all the description items in the ‘comments ’ column on the drawing have already been included in table B03.04-1	held on 15 June 2016, the description in table 03.04-01 shall be included in the comments column within the drawing's legend.

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					<p>4. Tables in this section shall be amended to further explain the treatment process of the various discharges and to include the UTM coordinates of the discharge points. These shall also be given a unique reference point which will be that marked on corresponding plans.</p> <p>5. Any discharges from the FSU shall also be marked on plan and in view that this will be a stationary unit, co-</p>			<p>4. Tables in this section shall be amended to further explain the treatment process of the various discharges and to include the UTM coordinates of the discharge points. These shall also be given a unique reference point which will be that marked on corresponding plans.</p> <p>5. Any discharges from the FSU shall also be marked on plan and in view that this will be a stationary unit, co-</p>			<p>sea, whereas document 2779-77-CI-DR-000401 does not include this.</p> <p>Kindly reconfirm and amend drawing / document accordingly</p> <p>4. Tables in this section shall be amended to further explain the treatment process of the various discharges and to include the UTM coordinates of the discharge points. These shall also be given a unique reference point which will be that marked on corresponding plans.</p> <p>5. Any discharges from the FSU shall also be marked on plan and in view that this</p>	<p>4. Can we discuss requirements</p> <p>5. Agreed. Have added the additional cooling water that is required when the vessel is mobilised as a temporary discharge for</p>	<p>4. Tables in this section shall be amended to further explain the treatment process of the various discharges and to include the UTM coordinates of the discharge points. These shall also be given a unique reference point which will be that marked on corresponding plans. Kindly ensure to include discharge to sea from the CCGt interceptor together with the discharge to sea from the interceptor to be connected to you final waste m management area</p> <p>5. See</p>	<p>4. Refer to drawing ENEM-URS-E0-00-DR-ME-00113 for unique ref and UTM details.</p> <p>This is included in SD02</p> <p>5. Marked on plan accordingly</p>	<p>4. Noted, discharge from waste management area which may now be allocated to EGM and has not been included. Kindly resolve the issue at the earliest so that this can be included in relevant documentation in this application. In the event that this will be routed to the interceptor catering for oily water at the CCGT this shall be included in the text</p> <p>5. Noted. From discussions ERA understands that although the same coordinates have been provided SD04,SD05, SD06 have separate</p>	<p>4. This will be updated once Enemalta have confirmed EGM's water management area proposal</p> <p>5. Confirmed, they are separate discharge points albeit adjacent to each other.</p>	<p>4. Noted. Kindly follow-up issue and provide necessary feedback and updated information as previously requested.</p> <p>5. Noted</p>

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					ordinates of the discharges shall also be provided. This shall include the expected volume of ballast/bilge water within the FSU and the frequency of replacement and thus discharge/disposal.						will be a stationary unit, co- ordinates of the discharges shall also be provided.	circa 12 months	comment above		discharge points located close to one another. Drawings shall be amended once waste managemen t areas or both EGM and ENE are determined and established including details on treatment prior to discharge.	Agreed	Drawings shall be amended once waste manageme nt areas or both EGM and ENE are determined and established including details on treatment prior to discharge
B3.5	✖	Not Yet Submitted	See Form	✖	1. Drawing 47067567-1022 does not show the discharge point to sea into Marsaxlokk bay. Kindly amend and resubmit drawing. 2. Drawings “Appendix A – Rainwater drainage plans - EPC1 and EPC 2” quoted in this section have not been submitted or could possibly have a different names (attachment and drawing number). All	1. Drawing references updated 2. Correct drawing included. 2779-77- CI-DR- 000401 Regasificati on Facilities Stormwater Drainage Works MT1001- UZ- CLD103- 444911146 CCGT Genera	✖	Submissions and drawings are noted, Kindly confirm that the feature marked as RIP- RAP is the location of the outfall as described in the legend containing the UTM Coordinates (in Document 2779-77-CI- DR-000401) if this is the case kindly amend drawing to label the outfall.		✓	No confirmation on MEPAs previous comment has been provided. Kindly confirm that the feature marked as RIP-RAP is the location of the outfall as described in the legend containing the UTM Coordinates (in Document 2779-77-CI-	Rip Rap refers to the erosion protection along the exposed face of the regasification Plant. The outfall is the discharge pipe shown and labelled in the table.	Noted.				

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					submissions do not however contain rainwater discharge plans. In the event that there are several catchment areas and discharge points, these shall be included in the drawings to be submitted must	Layout Arrangeme nt Drawing MT1001- UZ- CLD103- 445172836 MT1001- UZ- CLD103- 445172843					DR-000401) if this is the case kindly amend drawing to label the outfall.						
B3.6	✖	Not Yet Submitted	See Form	✖	3. Reply to this section also mentions drawing “ENEM - URS - E0 - 00 - DR - ME - 00063 - P1”. This drawing has not been submitted. This reference number shall be included in the list of attachments in the form.		✖	Document B0306 has not been submitted. Although MEPA notes that replies may have been partially provided in earlier sections, kindly include such replies in this section and enhance with data requested by MEPA in the earlier review. MEPA also notes the submission of drawing number ENEM-URS- EO-OO-DR-CE-00056 which includes all emission points. In this		✖	No update on this section has been provided. MEPA's previous comments are still applicable. Document B0306 has not been submitted. Although MEPA notes that replies may have been partially	Section updated, to include all normal operating regimes, specific operational regimes (STS transfers) and emergency standby emissions.	Kindly confirm whether the two units (mobilised 58.5 MWth each) immobilised 14.7 MWth each share the same stack. Kindly amend table in drawing to include all plant as	They do. They will not be running at the same time. Drawing updated	Noted The NVCC has not been included as appoint source. Kindly confirm whether the Emergency	This has been added to the drawing Confirmed	The drawing confirming this inclusion has not been submitted.

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					<p>1. Operator is to note that the BAT-AELs in the proposed LCP Bref are as follows:</p> <p>NO_x: 10-25 mg/Nm³</p> <p>CO: 1-15 mg/Nm³</p> <p>Also, kindly note that the IED specifies that the NO_x and CO emission limit values set out (50mg/Nm³ and 100mg/Nm³ respectively), apply above 70% generating load. In view that it is being stated that CO emission levels can only be guaranteed at 70% to 100 % load, permit conditions in this regard will be included in the eventual variation. SCR may need to be considered given that there may be issues related to local air quality.</p> <p>2. Information on the plant’s potential to include additional abatement (if required) shall be</p>		<p>regard, kindly confirm whether any additional plant mentioned earlier in this review needs to be included.</p>		<p>provided in earlier sections, kindly include such replies in this section and enhance with data requested by MEPA in the earlier review.</p> <p>MEPA also notes the submission of drawing number ENEM-URS-EO-OO-DR-CE-00056 which includes all emission points. In this regard, kindly confirm whether any additional plant mentioned earlier in this review needs to be included.</p>	<p>1. Note that apart from startup and shut downs the GTs will not be operating below 70% load. This is reflected in the various operational modes discussed in section B2.2.1, and is the reason why the GTs are required to operate in OC to cover all dispatch ranges.</p> <p>Drawing 00056 updated to show all emission points.</p> <p>2. Not required, refer to response above.</p> <p>3. Updated to</p>	<p>listed in section 3. The NVCC shall also be included as a point source</p> <p>1. Noted</p> <p>2. Noted.</p> <p>3. See responses below</p>	<p>1.</p> <p>2.</p> <p>3.</p>	<p>Generator on board the FSU shares the same stack as the main boilers/aux boilers.</p> <p>1. –</p> <p>2.</p> <p>3. See comments below:</p>		<p>Noted.</p> <p>3. Kindly refer to comments below:</p>		

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					<p>included as a follow up to point “1.” Above.</p> <p>3. Document shall be amended to include expected SO2 emissions during various operating modes and on fuels with different sulphur content.</p>							<p>included SO2 emissions. Also refer to SOx modelling report by ADI Associates</p>	<p>3. With regards to the SO₂ Emissions modelling kindly note the following:</p> <p>a. Kindly submit a timeframe for submission of the phase 2 method statement for modelling exercise (modelling of emissions of the new power station plus the existing) as detailed in ADI Method Statement.</p> <p>b. The document makes no reference to the small generating plants. ERA had requested the omission of such plants</p>	<p>a) This will be completed second half of June 2016</p> <p>b) This will be included with Phase 2.</p> <p>c) Update to include this can be competed second half of June 2016</p>	<p>a. Kindly note that in previous section, the timeframe “prior to public consultation ” was provided. This is to be submitted before public consultation at the latest.</p> <p>b. Noted</p> <p>c. Kindly see comment above re</p>	<p>A As explained today we will not be in a position to submit the SOx modelling Phase 2 until the end of June. This will be before the start of the Public Consulation</p>	<p>a. Noted</p> <p>b. –</p> <p>c. Noted</p>

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													<p>from the study is substantiated.</p> <p>c. In addition to determining whether the guaranteed S content of the LNG will exceed the 3% criteria, the method statement had also indicated that the model shall also allow determination as to whether SO₂ emissions from each of the 3 stacks does not exceed the monthly limit value.</p> <p>d. Kindly provide the modelling uncertainty for this study.</p> <p>e. In addition to submitted modelling study, ERA</p>		<p>submission timeframe.</p> <p>d. Kindly see comment above re submission timeframe</p> <p>e. Kindly see comment above re submission timeframe.</p>	<p>c. This will be by the end of June, before Public Consultation</p> <p>d. Noted</p> <p>e. Noted</p>	

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					<p>4. Kindly provide information (possibly through discussions with Enemalta) on expected percentage of yearly loads within which ElectroGas will be operating within the 70% to 100% load bracket. Kindly also provide information on expected emissions at other loads.</p> <p>5. For each generator additional boiler to be included kindly provide rated thermal input, power output, hours of operation, stack height above sea level and fuel used. – <u>ANY UNIT ABOVE 1 MWth WILL NEED TO BE INCLUDED IN THE AIR DISPERSION MODEL STUDY.</u></p> <p>6. Kindly amend drawing number in the form in view that the drawing provided is labelled as “ENEM-URS-FS-00-DR-ME-00056” and not as “ENEM CE-00056” as is stated in the form</p>							<p>4. See response to item 1 above.</p> <p>5. Included</p> <p>6. Drawing updated</p> <p>7. Included on drawing 00056</p>	<p>had also requested confirmation as to whether the retention of the FSU’s propulsion will have any significant impact on the air dispersion modelling for NO_x, SO_x and PMs The relocation of the stacks as well as additional generators and boilers is to be also taken into account.</p> <p>4. Noted.</p> <p>5. Noted</p>	<p>4.</p> <p>5.</p> <p>6.</p> <p>7.</p>				

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					7. Kindly provide an additional drawing showing all emission points to air from the generator/ and/or boilers located on the FSU. Together with details as requested in 3 above.								6. Noted 7. Noted				
B3.7	✖	Not Yet Submitted	See Form	✖	Kindly amend form to include reference to document B0306 in view that one can find an explanation regarding the lack of odours on site. Kindly provide information as to possible odour emission during changes in the FSU ballast/Bilge water and any possible abatement.	Amended We are not anticipating any odour emissions during changes in the ballast water.	✖	Document B0306 has not been resubmitted		✓	Document B0306 has not been resubmitted	Submitted	Noted.				
B3.8	✖	Not Yet Submitted	See Form	✖	Noted. Conditions will be included on site impermeability including construction standards and tests to be carried out on all sumps, settling/neutralisation pits and interceptors.	No emissions to land. Noted.	✓	Noted. land and groundwater monitoring will nonetheless be required as part of the IPPC permit		✓	-		-				

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B3.9	✖	Not Yet Submitted	See Form	✖	<p>1. Section may need to be amended following noise monitoring required as part of the EIA update due to the reconfiguration of the engines.</p> <p>2. The Authority required difference in measured sound at the closest noise sensitive receptor to be 5 db(A) or less for the facility to be in line with MEPA requirements. The issue shall be further discussed with the operator</p> <p>3. Noise monitoring will be required as part of the IPPC Permit and shall follow: standard ISO8297: 1994 and any revision thereof, and ISO37XX series or specifically ISO 96 142:1996. Such a standard is more relevant to multi operator installations.</p> <p>4.further comments will be</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p> <p>4. Noted</p>	✖	<p>1. Section may need to be amended following noise monitoring required as part of the EIA update due to the reconfiguration of the engines.</p> <p>2. Noted</p> <p>3. Document to be amended to address recent discussions between all operators in terms of compatibility of noise monitoring standards and in line with MEPA's previous comments in this regard.</p> <p>4. Pending internal consultation following next draft submission</p>		✖	<p>No updates have been provided. As previously indicated, amendments to this section may be necessary following noise monitoring study required as part of the EIA.</p>	<p>Combined noise monitoring will be carried out in conjunction with the other operators on the Delimara site. Enemalta will take the lead in this and have engaged with Acousti-CAL Consultancy to produce the noise monitoring method statement which is currently being discussed and reviewed by all parties.</p>	<p>Operational noise monitoring strategy as agreed upon by all operators is to be submitted once discussions on the matter are finalised.</p>	<p>Monitoring strategy agreed between all parties</p> <p>Enemalta to submit on behalf of all parties.</p>	Noted.		

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					provided once Unit A consults with the MEPA Noise team												
B3.10	✖	Not Yet Submitted	See Form	✖	<p>General:</p> <p>Monitoring SOPs to be put in place as interim measures until achievement of ISO shall be provided and submitted for MEPA's review prior to public consultation.</p> <p>Regarding monitoring for emissions to the sea:</p> <p>1. Kindly provide details on arrangements in place so as to monitor the parameters listed in</p>	<p>Monitoring SOPs will be developed by the O&M team once they are mobilised.</p>	✖	<p>General:</p> <p>EMP needs to be provided in the next submission which addresses earlier MEPA reviews to this section and comments included in sections above</p> <p>Regarding monitoring for emissions to the sea:</p> <p>1. Kindly provide details on arrangements in place so as to monitor the parameters listed in the current IPPC permit prior to connection with the common discharge route.</p>		✖	<p>No updated information on this section have been provided. MEPAs previous comments are still applicable.</p> <p>General:</p> <p>EMP needs to be provided in the next submission which addresses earlier MEPA reviews to this section and comments included in sections above</p> <p>Regarding monitoring for emissions to the sea:</p> <p>1. Kindly provide details on arrangements in place so as to monitor the</p>	<p>EMP will be developed by the O&M teams during the commissioning phase.</p> <p>1. Can we discuss requirements</p>					

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					<p>the current IPPC permit prior to connection with the common discharge route.</p> <p>2. Kindly show on plan the monitoring point to be utilised by ElectroGas.</p> <p>3. Kindly provide details of arrangements in place on how end of pipe monitoring in the common outflow and monitoring at Electro Gas's monitoring point shall be coordinated so as to be able to trace possible exceedances in ELVs.</p> <p>4. Further comments will be provided once</p>			<p>2. Kindly show on plan the monitoring point to be utilised by ElectroGas.</p> <p>3. Kindly provide details of arrangements in place on how end of pipe monitoring in the common outflow and monitoring at ElectroGas's monitoring point shall be coordinated so as to be able to trace possible exceedances in ELVs.</p> <p>4. Further comments will be provided once consultation with MEPA's water & ecosystems management units and with its external regulatory consultees commences.</p>			<p>parameters listed in the current IPPC permit prior to connection with the common discharge route.</p> <p>2. Kindly show on plan the monitoring point to be utilised by ElectroGas.</p> <p>3. Kindly provide details of arrangements in place on how end of pipe monitoring in the common outflow and monitoring at ElectroGas's monitoring point shall be coordinated so as to be able to trace possible exceedances in ELVs.</p> <p>4. Further comments will be provided once consultation with MEPA's</p>	<p>2. Refer to Drawing ENEM-URS-E0-00-DR-ME-00106 IPPC External Tie In Points</p> <p>3. EGM will be monitoring upstream of the combined CW outfall mixing chamber.</p> <p>4. Noted</p>	<p>addressed.</p> <p>2. External tie-in points to be resubmitted following meeting held on 27 May 2016. .</p> <p>3. Not ed.</p> <p>4. –</p> <p>5. With</p>	<p>2. Drawin g updated</p> <p>3.</p> <p>4.</p> <p>5. Confirme d. Firefighting water for</p>	<p>2. Noted</p> <p>3. –</p> <p>4. –</p> <p>5. Noted</p>		

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					consultation with MEPA's water & ecosystems management units and with its external regulatory consultees commences.			Regarding monitoring for emissions to air: 1. Kindly provide additional information on the source of methane emissions from the FSU 2. Kindly include details on periodic monitoring to be included for any additional generator/ boiler above 1 MWth. 3. ElectroGas shall disclose the estimated occurrence of operations			water & ecosystems management units and with its external regulatory consultees commences. Regarding monitoring for emissions to air: 1. Kindly provide additional information on the source of methane emissions from the FSU. 2. Kindly include details on periodic monitoring to be included for any additional generator/ boiler above 1 MWth.		regards to the fire fighting water (which could be possibly contaminat ed), recent discussions indicated that such water will be stored within a bunded area for a short period following which it will be collected and disposed of as waste. Regarding monitoring of emissions to air: 1. Is there the potential for emission of methane? The statement : “ <i>The LNG facilities will necessarily, as part of operations, limit the atmospheric emissions of Methane</i> ”	potentially oil contaminate d areas shall be stored within the bunded area around the tank/plant for collection and disposal off site of for discharge through an oil separator. 1. Text updated with a more detailed explanation as to the design for prevention of discharge of Methane.	Regarding monitoring of emissions to air: 1. Noted. 2. Kindly refer to point 7 below.		Regarding monitoring of emissions to air:

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					<p>2. Kindly include details on periodic monitoring to be included for any additional generator/ boiler above 1 MWth.</p> <p>3. ElectroGas shall disclose the estimated occurrence of operations on open cycle (apart from the first 6 months of operation). This will allow MEPA to determine whether a permanent CEMS will be required on the by-pass stacks.</p> <p>4. In view that it being stated that the CEMS probes will be first used on the bypass stacks and then transferred onto the main stacks after the first six months of operation, kindly provide information as to whether the plant will have top be</p>		<p>on open cycle (apart from the first 6 months of operation). This will allow MEPA to determine whether a permanent CEMS will be required on the by-pass stacks.</p> <p>4. Following submissions on the use of the bypass stacks during the operational phase MEPA requires CEMS to be installed on both the main and the bypass stacks permanently. Calibration certificates following the installation of the CEMS will be required prior to commencement of operations in open cycle and prior to commencement of operations in closed cycle.</p> <p>5. Monitoring points for emissions to air are required prior to commencement of consultations with consultees.</p> <p>6. This section may need to be amended following the additional runs of the air dispersion model required for the EIA update.</p>		<p>3. Issue related to CEMS installation on the open cycle has been addressed,</p> <p>4. Same as point 3 above.</p> <p>5. Monitoring points for emissions to air are required prior to commencement of consultations with consultees.</p> <p>6. This</p>	<p>regards to the FSU, can we discuss what is required based on the limited operational durations</p> <p>3. Noted. Section updated to suit.</p> <p>4. Noted</p> <p>5. These will be in the Main and Bypass stacks and</p>	<p>give an understanding that methane may be emitted.</p> <p>2. The requirements of the Medium Combustion Plants Directive shall be discussed with the Operator.</p> <p>3. Noted</p> <p>4. Noted</p>	<p>2. Noted</p> <p>3.</p> <p>4.</p> <p>5.</p>	<p>3.</p> <p>4.</p> <p>5.</p>				

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					temporarily shut down during this transfer and how long it will take. Calibration certificates following the installation of the CEMS will be required prior to commencement of operations in open cycle and prior to commencement of operations in closed cycle. 5. Monitoring points for emissions to air are required prior to commencement of consultations with consultees. 6. This section may need to be amended following the additional runs of the air dispersion model required for the EIA update.			Regarding noise monitoring 1. Noise monitoring compatible with that carried out by the other operators will need to be carried out once operations commence. 2. Noise monitoring will be required as part of the IPPC Permit and shall follow: standard ISO8297: 1994 and any revision thereof, and ISO37XX series or specifically ISO 96142:1996. Such a standard is more relevant to multi operator installations.			section may need to be amended following the additional runs of the air dispersion model required for the EIA update. Regarding noise monitoring 1. Noise monitoring compatible with that carried out by the other operators will need to be carried out once operations commence.	connected through the CEMS equipment 6. Agreed. 1. Agreed. Combined noise monitoring will be carried out in conjunction with the other operators on the Delimara	5. Noted 6. – 7. The document is to be updated to include the emission profile of any plant above one MW so as to assess elvs applicable to this plant. Regarding noise monitoring 1. As requested in previous section, the coordinated noise monitoring strategy shall be submitted	6. 7. Refer to air emissions section B3.6 1. Monitoring strategy agreed between all parties Enemalta to submit on behalf of all parties.	6. 7. With reference to the emissions inventory table in document B03.06 kindly note the following: a. All emissions are to be provided in mg/Nm ³ view that these have only be provided for the FSU Service Diesel GenSet. b. kindly provide a clarification as to whether the two delimara 3 GRS gas boilers will be in operation during the whole time that Delimara 3 will be receiving gas. A This has been updated b. The two boilers in the D3 GRS will be in operation whenever Delimara 3 is operating, for the full duration of Delimara 3 operating..	7. With reference to the emissions inventory table in document B03.06 kindly note that following: a. SO2 emissions in mg/Nm3are to be updated in line with the text in the main document for the emissions from the gas turbine stacks. Concentration of this pollutant for the FSU auxillary boiler is to be provided and not assumed to be equal to the max S concentrati	

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					<p>Regarding noise monitoring</p> <p>1. Noise monitoring compatible with that carried out by the other operators will need to be carried out once operations commence.</p> <p>2. Noise monitoring will be required as part of the IPPC Permit and shall follow: standard ISO8297: 1994 and any revision thereof, and ISO37XX series or specifically ISO 96142:1996. Such a standard is more relevant to multi operator installations.</p>			<p>3. MEPA and the operator will therefore agree with MEPA on the timeframes for the submission of a noise monitoring proposal to be coordinated by Enemalta for MEPA`s review and timeframes for its implementation.</p>			<p>2. Noise monitoring will be required as part of the IPPC Permit and shall follow: standard ISO8297: 1994 and any revision thereof, and ISO37XX series or specifically ISO 96142:1996. Such a standard is more relevant to multi operator installations.</p> <p>3. MEPA and the operator will therefore agree with MEPA on the timeframes for the submission of a noise monitoring proposal to be coordinated by Enemalta for MEPA`s review and timeframes for its implementation.</p>	<p>site. Enemalta will take the lead in this and have engaged with Acousti-CAL Consultancy to produce the noise monitoring method statement which is currently being discussed and reviewed by all parties.</p> <p>2. See response to 1 above</p> <p>3. Agreed</p>	<p>once this is agreed upon by all operators.</p> <p>2. Noted</p> <p>3. -</p>	<p>2.</p> <p>3.</p>			<p>on in the natural gas.</p> <p>b. Noted</p> <p>c. The emissions profile of the Yanmar diesel generator on board to FSU is to be provided unless this is to be completely unused.</p>

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					3. MEPA and the operator will therefore agree with MEPA on the timeframes for the submission of a noise monitoring proposal for MEPA`s review and timeframes for its implementation.												
B3.11	✖	Not Yet Submitted	See Form	✖	Document B0311 has not been submitted	See submitted drawings ENEM-URS- E0-00-DR-ME- 00095, 00096 & 00097	✓	Noted see comments in earlier section .		✓	-	-	-				
B4 – Impact on the Environment																	
B4.1	✖	Not Yet Submitted	See Form	✖	A statement shall be submitted explaining the current effects of the site on the environment. (Possibly through section B 5.1).	EIS and B5.1 referenced	✓	-		✓	-	-	-				
B4.2	✖	Not Yet Submitted	See Form	✖	A statement shall be submitted explaining the current effects of the site on the	EIS and B5.1 referenced	✓	-		✓	-	-	-				

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					surrounding area. (Possibly through section B 5.1.)												

B5 – Environmental statements																	
Section	D M	MEPA Comments 18 September 2015	Reply by ElectroGas Malta Ltd. 07 October 2015	D M	MEPA Comments 19 October 2015 (update on 18 September 2015 review) based on submissions of parts A and B3 to B9 on 7 October 2015	Reply from ElectroGas Malta Ltd – 17 th December 2015 for Parts A and B1, and 18 th January 2016 for Parts B1 to B9	D M	MEPA Comments dated 18 th December for parts A and B1 and comments dated 26 th January for Parts B1-B9		DM	MEPA Comments 6 April 2016	Applicant1s response submitted on 9, 18 & 26 May2016	ERA comments 31 May 2016	Applicants response June 2016	ERA comments June 2016	Applicant response 14 June 2016	ERA comments 15 June 2016
B5.1	✖	Not Submitted	Yet See Form	✖	In reply to this question, relevant excerpts from the original EIA shall be provided including a summary of conclusions.	EIS is referenced and non-technical summary included in submission.	✓	Noted.		✓	-	-	-				
B6 – Statutory consultees																	
B6.1	✖	Not Submitted	Yet See Form	✓	Noted	-	✓	Kindly replace reference to Malta Maritime Authority with reference to Transport Malta		✓	Updated form has not been submitted. MEPA's previous comment is still applicable. Kindly replace reference to Malta Maritime Authority with Transport Malta.	Replaced	Noted. Kindly ensure correct formatting of the application form when submitting the consolidated hard copy for consultation .	Updated	Noted		
B6.2	✖	Not Submitted	Yet See Form	✖	Response provided in this section needs to be included in section 6.1.	-	✓	-		✓	-	-	-				

					What is also required as a response is the effect of the installation on the operation of other installations within the area of influence													
B6.3	✖	Not Submitted	Yet	See Form	✓	Noted	-	✓	Kindly replace reference to Malta Maritime Authority with reference to Transport Malta		✓	Updated form has not been submitted. MEPA's previous comment is still applicable. Kindly replace reference to Malta Maritime Authority with Transport Malta.	Replaced	Noted				
B7 – Planning Status																		
B7.1	✖	Not Submitted	Yet	See Form	✓	Noted. Updates will be required with any minor amendments or Development Notification orders required to implement the proposed development.		✓	Noted. Updates will be required with any minor amendments or Development Notification orders required to implement the proposed development. This includes reference to the minor amendment to PA 22/14		✓	Updates will be required with any minor amendments or Development Notification orders required to implement the proposed development. This includes reference to the minor amendment to PA 22/14		Kindly provide update related to any minor amendments required.	Drawings submitted for minor amendment to PA 21/14 6 th June 2016	Noted		
B8 – Technically Competent Person																		
B8.1	✖	Not Submitted	Yet	See form	✓	Noted. this may need to be updated once TCP is appointed		✖	Kindly tick relevant box in the application form and police conduct of TCP		✓	Updated application has not been submitted. MEPA's previous		Information submitted is noted.	Police conduct form included	Noted		

											comments are still applicable. Kindly tick relevant box in the application form and police conduct of the TCP.							
B8.2	✘	Not Submitted	Yet	See Form	✘	Not Yet Submitted	Current technically competent contact person added. Note that this may changed/be added to as EGM's O&M team mobilises. up	✘	Kindly provide CV of nominated TCP		✓	Kindly provide CV of nominated TCP		Noted.				
B8.3	✓	Not Submitted	Yet	See Form	✓	Noted	-	✓	-		✓	-						
B9 – Expenditure Plan																		
B9.1	✓	Not Submitted	Yet	See Form	✘	This will be required at the earliest prior to public consultation	-	✘	This will be required at the earliest prior to public consultation		✘	This will be required at the earliest prior to public consultation		With regards to the document provided, kindly note that budget allocations should be provided to ERA. This will allow the Authority to determine the bank guarantee which is to be associated with the issue of the IPPC permit. Should this item be confidential, the information will be omitted as part of the public consultation.	Included	Kindly note that certain allocations need to be revised and reflect actual costs of such requirements e.g. permit fees, emissions monitoring	EGM have a quote for items 12 through to 17, and not as broken down items. We would prefer to leave as is, but can discuss.	As discussed with AECOM on 15 June 2016, it is recommended that the budget allocation for all the monitoring is revised as well as the costs for permit fees.

