

**Feedback received following the Statutory Consultation carried out for the application of variation and renewal of the Delimara Power Station carried out between 17 June – 8 July 2016**

Comment received by	Feedback	ERA reply and comment	Enemalta reply	Electrogas Malta reply	D3PG reply	Consultees Review on Operator's response (please provide feedback in the respective operator's column)
						Enemalta
						EGM
						D3PG
External Consultees Feedback						
<b>Environmental Health Directorate</b>	<p>The issues of concern to public health especially in relation to the nearby populations include:</p> <ul style="list-style-type: none"> <li>• Emissions to Air (especially NOx, SOx, CO, and PM, VOCs, Odour);</li> <li>• Noise and vibration emissions;</li> <li>• Emissions to Marine Water, including cooling water, runoff of contaminated rain water and anti-fouling agents;</li> <li>• Discharges to groundwater;</li> <li>• Waste management (including containment, transport and disposal);</li> <li>• Discharges to sewers.</li> </ul> <p>Best available mitigation measures and monitoring programs are to be included in the permit. Emission data must be publicly available.</p> <p>Landscaping plans aimed at mitigating noise and visual impacts are to be included and implemented.</p>	<p>Noted. Conditions regarding the issues raised shall be addressed through permit conditions. Once the permit is drafted, it shall be circulated to the regulatory consultees for feedback.</p> <p>Noted. The IPPC permit shall require all operations to be in line with the best available techniques. The Annual Environmental Reports (AER) containing the emissions data shall be publically available on ERA's website.</p> <p>Noise abatement shall be addressed through specific infrastructural elements in the design of the plant. Visual impact has been assessed as part of the EIA process.</p>	<p>No further comments</p> <p>No further comments.</p> <p>Enemalta shall not be installing any additional generating plant. Noise monitoring shall be conducted as per IPPC requirement.</p>	<p>Please refer to updated section B.03.09 Noise mitigation measures .</p>	<p>Under normal conditions, the noise generated from D3PG is not expected to increase from the existing scenario. Nonetheless, noise monitoring will be</p>	<p>No comments to feedback received from Enemalta, Electrogas and D3PG in response to our earlier comments.</p>

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	<p>Complaints from sensitive receptors regarding any of the above concerns must be addressed by submitting to the permitting agency, relevant management plans, which shall include immediate actions and future recommendations for abatement of the emission or nuisance, including timeframes for implementation of such plans.</p> <p>Contingency plans for the expected increase in SOX and PM emissions should diesel be used as a backup fuel in emergency scenarios.</p>	<p>Noted. The IPPC permit shall include conditions require all operators to keep a record of all environmental complaints received. In cases where such complaints are related to possible breaches of permit conditions, procedures shall be in place so as to assess such breaches and remediate as necessary.</p> <p>Feedback to be provided by respective operators, as indicated.</p>	<p>No further comments.</p> <p>Dispatch scenario considering the use of diesel as a backup fuel in perceived scenarios has been assessed from and NEC perspective so as to ensure limits are not exceeded.</p>	<p>The SOx emission study is in progress and will be submitted by the 29<sup>th</sup> of July as part of the updated EIS Statement</p> <p>Note that with regards to EGM emergency diesel generators these will be used to safely shut doen plant and not as an alternative</p>	<p>required as part of the IPPC Permit and shall follow: standard ISO8297: 1994 and any revision thereof, and ISO37XX series or specifically ISO 9614-2:1996. The latter is more relevant to multi operator installations. Noise monitoring method statements are currently being drafted by a common consultant appointed by all 3 operators.</p>			

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				fuel. They are less than 3.5MWth in total	Kindly refer to Table 1 comparing emissions between the existing engines and the converted engines operating on LNG and diesel. The SOx and PM emissions from the operation of the engines on diesel is slightly higher than the emissions from the operation of the engines on LNG. However, the emissions are still significantly lower for SOx when compared to the existing emissions. This scenario does not apply to PM.  Emergency scenarios are defined in Section 1.1.2.5 of the report. These take into			

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					<p>consideration the legal obligations listed in L.N. 11 of 2013 – Industrial Emissions (Large Combustion Plants).</p> <p>Engine operation on diesel is limited to emergency situations, with limited timeframes (&lt;120hours) by which the operators of D3 must abide to when using diesel as a fuel for prolonged periods. In the case of longer periods, the director of the EPD may suspend the requirement to abide by the ELVs for up to 6 months, in cases of overriding energy supply issues on the island. Such long periods (&gt;120hours) are not</p>			

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					envisaged. Should however this be the case, the re-installation and re-commissioning of the full gasoil exhaust abatement system might be required to cater for prolonged gasoil operation. Despite being technically possible, this entails a number of logistical, operational and feasibility considerations which are being discussed.			
<b>Malta Competition and Consumer Affairs Authority</b>	<p>1. Comment on excel sheet submitted by Enemalta in section C2.1 <i>DPS Environmental Monitoring plan_r3_2015-04-22</i></p> <p>With regards to the minimum legal obligations indicated in the excel sheet, technically these are no longer calculated by kilos but by CO2 emissions (please view Regulation 517/2014 Article 4 (3)):</p> <p><i>The leak checks pursuant to paragraph 1 shall be carried out with the following frequency:</i></p> <p><i>(a) for equipment that contains fluorinated greenhouse gases in quantities of 5 tonnes of CO2 equivalent or more, but of less than 50 tonnes of CO2 equivalent: at least every 12 months; or where a leakage detection system is installed, at least every 24 months;</i></p>	<p>1. Operators to provide feedback in line with calculation methodologies provided in regulation 517/2014.</p> <p>Kindly note that leakage check requirements shall be included as permit conditions. Once the permit is drafted, it shall be circulated to the regulatory consultees for feedback.</p>	<p>1. comment noted. Requirements of 517/2014 shall be included in updated Environmental Monitoring Plan.</p> <p>No further comments.</p>	<p>1. Please note the global warming potential (GWP) for the different fluorinated gases within the project are already expressed as CO<sub>2</sub> equivalent as per 517/2014 regulation. Refer to existing section B.02.04</p>	<p>1. No CFC gases are present at D3.</p>	No further comments received.		

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	<p>(b) for equipment that contains fluorinated greenhouse gases in quantities of 50 tonnes of CO2 equivalent or more, but of less than 500 tonnes of CO2 equivalent: at least every six months or, where a leakage detection system is installed, at least every 12 months;</p> <p>(c) for equipment that contains fluorinated greenhouse gases in quantities of 500 tonnes of CO2 equivalent or more: at least every three months or, where a leakage detection system is installed, at least every six months.</p> <p>2. With reference to document C2.4, section C2.4.2, please note that MCCA is concerned about the phrase: <i>"It is to be noted that unless R22 gas is extracted and disposed of, maintenance and servicing of R22 systems will continue to be carried out on unused equipment as per operational equipment."</i></p> <p>Please note that maintenance and servicing on R22 equipment can be done ONLY if the refrigeration circuit is untouched.</p>	<p>2. Noted. Enemalta to provide feedback and update document C2.4 accordingly.</p>	<p>2. As per statement in section C2.4.2 "No virgin or recovered R22 can be used to service air-conditioning units."</p>					
<b>Malta Resources Authority</b>	<p>The Malta Resources Authority has no comments on the IPPC application IP002/07 Delimara Power Station in so far as its area of competence as currently specified in the Malta Resources Authority Act is concerned. This and any other response in writing by the MRA to the application submitted for consultation or to any other documentation, should not in any way be deemed as approving or condoning any matters beyond the MRA's immediate remit and response. In particular, you are reminded that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations do not fall within the remit of Malta Resources Authority and as such the MRA has no authority to issue recommendations or otherwise relative to matters regulated by these regulations. This response by the MRA may not be publicly used or mentioned as a general or partial approval by the MRA of the matter referred to for consultation.</p>	Noted.	N/A	N/A	N/A	No further comments.		
<b>Planning Authority</b>	There is no objection from a development planning point of view as long as works are related to plant and machinery required for the operation of the use of the power station within the perimeter of the power station.	Noted.	N/A	N/A	N/A			

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<b>Regulatory for Energy and Water Services</b>	<p><b>Licensing Comments</b></p> <p>The information obtained from the 3 CDs shows that a number of fuel installations and tanks will be decommissioned or their use will be changed. It is important that the applicants/ operators submit a decommissioning report for every fuel tank which will be put out of service.</p> <p>It is also noted that there will be a new Diesel or Gasoil storage tanks other than the primary storage tanks which are already authorised. The operators are reminded that each diesel or gasoil storage tank whether large or small should be duly authorized by the Regulator. Technical proposals or Technical reports should be specifically written by authorized competent persons, a list of which can be found on the following link <a href="http://downloads.rews.org.mt/files/c0d7e0a3-6f1d-48af-aac8-798bd996734d_cca927ca-bf07-4556-ad46-aab155f495d6.pdf">http://downloads.rews.org.mt/files/c0d7e0a3-6f1d-48af-aac8-798bd996734d_cca927ca-bf07-4556-ad46-aab155f495d6.pdf</a></p> <p>The applicants/operators are required to contact the REWS on <a href="mailto:enquiry@rews.org.mt">enquiry@rews.org.mt</a> for further details to be guided through the application processes.</p> <p><b>Regulation Comments</b></p> <p>The operations and activities related to the provision of LNG/natural gas are regulated under the Natural Gas Market Regulations S.L.545.12 and the Petroleum for the inland (wholesale) fuel market, bottling of LPG and primary storage facilities (S.L.545.17).</p> <p>The generation of electricity is regulated under the Electricity Market Regulations. (S.L. 545.13).</p> <p>The proponents of the projects/operators should be directed to liaise with the Regulator for Energy and Water Services to ensure compliance with the above mentioned legislation.</p>	<p>1. Noted. Operators to provide feedback and contact REWS</p> <p>2. Noted. Operators to provide feedback and contact REWS</p> <p>3. Noted. Operators to provide feedback and contact REWS</p>	<p>1. Enemalta shall not be decommissioning any fuel storage tanks.</p> <p>2. N/A</p> <p>3. N/A</p>	<p>1. N/A</p> <p>2. EGM has the following Diesel tanks for use by emergency/secondat=y diesel generators, in the case of a black out from the grid or loss of ship to shore power to the FSU;</p> <p>a) FSU Diesel Tank, 2400 m<sup>3</sup> b) Regas Diesel Tank; 4.5 m<sup>3</sup> c) CCGT Diesel Tank; 2.0 m<sup>3</sup></p> <p>We have engaged in discussions with Ing. Paul D. Cardona to assist us with these certifications.</p> <p>3. We have already commenced supplying REWS with requested information with regards to the various licences required with regards to LNG import and Storage and Electricity generations. We will progress these discussion over the coming weeks.</p>	<p>1. N/A</p> <p>2. There are no new diesel storage tanks other than the primary storage tanks. The only small reservoir will be a small 3m<sup>3</sup> tank to operate the auxiliary boiler without having the need to continuously leave on the supply diesel pump whilst the plant is shut down.</p> <p>3. D3PG duly contacted REWS and MRA, and filled in the requested application form for Electricity Market</p>	The REWS has no further comments to the REWS' relevant section		

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					Regulations. The other regulations were not applicable to D3.			
<b>Transport Malta</b>	<p>TM notes that there are references to requirements such as having in place a SMS and ERP etc. There are also provisions for specialised training to be provided to employees.</p> <p>Once there is a SMS in place, SOPs and ERPs etc that also cover the marine/terminal aspect there is not much that we need would need to add. In this respect please advise if such requirements/provisions have been verified or the process of how this will be audited. Therefore for the time being we seek a clarification.</p> <p>Should we receive confirmation that a SMS, SOPs and ERP are in place and approved then we will not impose additional requirements.</p> <p><b>Feedback received on 28 July 2016</b></p> <p>Documents required with respect to the IPPC permit include the cargo operations manual and the Marin nautical studies.</p> <p>Regarding the cargo operations manual we note that the manual is not complete, since procedures relating to the cargo operations related to the FSU/LNG/C and Regas terminal are not included. At this stage I am not aware regarding the Ship to Ship cargo operation manual and whether this forms part of the IPPC permit. However, bearing in mind that it too relates to cargo operations, as the cargo operations manual, would like at this stage to point out that we have never received a copy.</p> <p>Regarding the Marin nautical studies, chapter 8 was agreed to be included and which would relate to the storm mooring. Following recent correspondence regarding the matter, the current Marin storm mooring study is not acceptable as this does not refer to the new proposed</p>	<p>Noted. Operators are kindly requested to submit copies of the studies referred to by TM including the updated maritime risk assessment for TM's perusal.</p> <p>ERA:Please see comment 6 by CPD and provide a reply accordingly. Reply to comment 6 included in CPD section.</p> <p>EGM to provide reply</p>	Once the safety studies are finalised, these are to be submitted to TM for vetting and review.	<p>The SMS and ERP have now been finalised and have been submitted via OHSA.</p> <p>The Cargo operations and ship to ship transfer manuals have been updated and issue to Transport Malta 1/Aug/16. Please note that STS Transfer</p>	N/A			



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	<p>design. Time frame related to the revision of this document is required as it greatly ties in with the arrival of the vessel.</p> <p>Regarding venting in Port, as noted during recent meetings this does not form part of the day to day cargo operations. Venting is required as a safeguard to protect the structure of the tanks and under emergency situations an understandable incident. However under normal controlled conditions, mitigating measures in the form of standard operating procedures, should be included in the cargo operations manual, which highlights that under controlled increasing tank pressures, venting in port will not be permitted and as such operators to clarify and document corrective action plan.</p> <p>The jetty by a recognised organisation, such as BV, would be required prior to permitting any vessel berthing alongside the jetty. Although operators have stated that BV will be engaged to certify the jetty accordingly, we have not been provided with a timeframe.</p>			<p>manual relates to the FSU/LNGC</p> <p>The suite of 8 Marin reports are complete and issued; Item 8 the storm mooring risk studies is currently being updated to reflect the revised SMS and will be issued on 4<sup>th</sup> Aug.</p> <p>This point has been noted and is currently being incorporated.</p> <p>BV have been contracted to carry out the certification scope for the jetty and their initial findings report is due to be issued on the 24<sup>th</sup> August</p>				
<b>Civil Protection Department</b>	<p>The Civil Protection Department has been reviewing the Electrogas / Enemalta documentation produces for the New Delimara LNG Power plant. At this point in time, from a Civil Protection point of view the Civil Protection Department has no objection to IPPC approval provided that;</p> <ol style="list-style-type: none"> <li>Two brand new industrial fire fighting response vehicles are procured for the purposes of responding to any LNG incident in the event that all the safety and precaution measures within the plant fail. It is to be noted that the request for such vehicles has already been accepted and procurement process has been initiated.</li> <li>Various items of equipment, inclusive of but not limited to LNG detectors, High and low expansion foam ,LNG detection camera and explosion proof radios to be procured to respond to any LNG incident. It is to be noted that the request for such equipment has already been accepted and procurement process has been initiated.</li> </ol>	1. Noted	1. N/A	1. N/A	1. N/A	<p>CPD has nothing further to add to original feedback which was included in the statutory Consultation document for information. However, you may wish to note that item No. 6 will be discussed together with representatives of the T.M. next Monday. In case of fresh developments these will be immediately communicated to you in due course.</p>		
		2. Noted.	2. N/A	2. N/A	2. N/A			

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	<p>3. Entrance to the site must allow vehicles of 3.5 metre width and roads must be asphalted or gravelled to allow CPD vehicle access. All entry / exit points must allow such access and the site must have more than one access point as discussed during the meeting held at Delimara on 22/7/2016.</p> <p>4. Training on LNG is provided to CPD. Training is scheduled to be carried out in Malta in August and Netherlands in September.</p> <p>5. All the requirements and conditions imposed by Falck are to be met, as highlighted in the External emergency plan. The plan is yet to be submitted and therefore the exact requirements and conditions are not yet known.</p> <p>6. CPD will not be taking care of the marine side of the projects. As things stand today, CPD lacks the expertise, assets and resources to tackle the emergency response from the marine side, however in the event of an emergency CPD will still take on its role of co-ordinating emergency response with other stakeholders such as Transport Malta in this case.</p>	<p>3. Operators to provide feedback.</p> <p>4. Noted</p> <p>5. Noted. Further comments on the External emergency plan may ensure.</p> <p>6. ERA: Noted. Comment being addressed to TM.</p> <p>TM reply: Regarding item 6 Transport Malta requires further clarification, in view of following:</p> <p>1) CPD is a member of the COMAH "Competent Authority" and there are already several Seveso sites in Malta that are Marine Terminals and handle tankers.</p> <p>2) CPD have recently contacted Falck Group to assist them with preparedness capabilities to</p>	<p>3. The entrance gates and internal roads are all greater than 3.5 metres. It is to be noted that ENE is coordinating directly with CPD so as to ensure that current and future requirements pertaining to CPD vehicle access are fulfilled.</p> <p>4. N/A</p> <p>5. N/A</p> <p>6. N/A</p>	<p>3. Access roads into the D4 CCGT site are all wider than 3.5m, and are concrete rather than asphalted, but this will similarly allow CPD vehicle access. The external access road will be 5.0m wide and internal roads within the regards plant will be 5.0 &amp; 4.0m wide and they will all be asphalted</p> <p>4. N/A</p> <p>5. N/A</p> <p>6. N/A</p>	<p>3. All entry/exit points within the D3 site have a 3.5m width that is suitable to allow CPD vehicle access.</p> <p>4. N/A</p> <p>5. N/A</p> <p>6. N/A</p>			

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		<p>specifically also deal with a marine related incident.</p> <p>Whilst TM would assist as required in the event of a marine related incident the respective competencies have to be clearly defined and in line with the applicable legal provisions.</p> <p>ERA reply: Further discussions between the Authorities shall be carried out as indicated in email from Mr John Rizzo dated 04/08/16.</p>						
<b>Water Services Corporation</b>	1. Delimara 4: EGM – the permitting process has already started from our end since we have been contacted by EGM and had already thrashed out our queries. In essence they will only be discharging domestic sewage through a dedicated cesspit connected to our network through a pump.	<p>1. Kindly note that the EGM submission includes both a cesspit to cater for the regas area, disposal of treated effluent from the FSU sewage treatment plant by means of a barge and subsequently through a road tanker for disposal to the sewage network as well as independent direct connection to the sewer from the CCGT area.</p> <p>Kindly confirm whether WSCs requirements for the management of all of the above effluents are currently being addressed.</p> <p><b>Kindly note further queries from WSC:</b></p> <p>1. EGM did not indicate this cesspit coming from regasification of LPG. If this cesspit is connected to sewer (either directly through a pipe or indirectly through a waste carrier) this effluent will have to be tested prior to be given permission to discharge.</p> <p>2. EGM explained to WSC that they will have 4 waste streams: Foul water from admin block connected to sewer via cesspit, black water line (not connected</p>	1. N/A	<p>1. The Regas Plant Cesspit is not connected via a pipeline to a public sewer but will emptied via a licenced tanker. EGM will updated their discharge permit accordingly</p> <p>2. The information is correct for the CCGT plant, relating to the</p>	1. N/A	See end of column <i>Feedback</i>		

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	2. As regards Delimara 1&2: Enemalta – WSC have raised the concern regarding separation of wastes from D3PG and Enemalta. WSC have indicated that there are no drawings or documentation to indicate that there was a separation in the pit and have requested clarification on this matter. It is important that sewage from both entities remain “separate” to allow monitoring of both independently. As regards permitting, we will be modifying their permit to take into account the changes upon renewal.	<p>to sewer and to be reused internally), oily storm water line (runoff passing through interceptor and discharge to sea) and neutralization water line (which will be discharged along with the Aux cooling water to sea). We would like an official confirmation of the above and whether there are any other waste streams which have not yet been specified. If the information given was incorrect EGM should clearly specify the following for each waste stream: A) Source/s, B) Mode of disposal, C) point of discharge D) Substances known to be present in effluent. Another point to highlight is that any waste water (which is not of domestic origin i.e. it is industrial trade effluent) must be tested for the parameters which will be imposed by WSC.</p> <p>3. We have already been informed about this however WSC will only accept domestic sewage (or treated effluent from STP) to be discharged to sewer. Any waste bilges will most probably be contaminated with oil and MUST NOT reach the sewer but disposed of at appropriate facilities. Receipts of such transfer of waste must be produced.</p>	<p>2. Reference is to be made to section C3.3.</p> <p><i>“DPS3’s waste water sump operated by D3PG is located at point A, to which only D3 discharges. If needed, an isolated sample can be taken from this sump tank.</i></p> <p><i>As per DPS-WG-0010,</i></p>	<p>currently applied discharge permit. Only domestic waste water will be discharged into the WSC sewers. This will be the same for the Regas Cesspit referred to in item 1 above.</p> <p>3. Bilge water from the FSU will not be discharged with the treated domestic sewage, but will be stored separately and disposed of through potentially oil water routes.</p>	2. Access to a sampling point will be made available to monitor waste water arising from D3. This will be allow for the ‘separate’ monitoring of discharges			


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	<p>3. As regards Delimara 3: D3PG – WSC have noted that Shangai electric power malta have not yet contact WSC to initiate permitting process. It is important that WSC is approached without delay in order to have all 3 entities permitted as required.</p>	<p>3. D3PG to contact WSC forthwith.</p>	<p><i>the foul water streams described above connect to the new cesspit which pumps the effluent to M'Xlokk.</i></p> <p><i>Should a foul water system contamination occur, a sample may be taken from the points identified above.</i></p> <p><i>Should contamination result at TP11 it is more probable that this has occurred within D3 plant itself rather than the CCR where there is no machinery, and a sample could be taken from Point A to confirm this. If needed, a sample may also be taken from the sewer junction box adjacent to the CCR building. In this context Enemalta sees no need to separate the discharge of the CCR foul water system from that of D3 at point TP11, and therefore opts to not affect any modifications to the existing system."</i></p>	<p>3. N/A</p>	<p>from different operators.</p> <p>3. Kindly advise which permitting procedures are being referred to.</p> <p><b><i>During meeting held on 26/07/16, ERA explained</i></b></p>			


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	<p><b>Additional Feedback from WSC received on 29 July 2016.</b></p> <p>1. Replies from operators noted. WSC wanted to clarify that any pit which will be emptied by waste carriers and eventually discharged to sewer is considered as <b>connected</b> to sewer <b>indirectly</b>. In the event that this waste is <b>NOT</b> of a domestic sewage nature, this will require testing a priori.</p> <p><b>EGM please note:</b></p> <p>2. Document B.03.01.03 states that one of the waste types will be Sludge from FSU STP (EWC 20.01.08). It is stated that this waste will be transported via barge and bowser to sewage treatment plant. Kindly confirm whether this is referring to WSC STPs? If affirmative, have there been any discussions with WSC for the disposal of such sludge? In the absence of such discussions/concessions this sludge should be dewatered on the FSU and disposed of at landfill similarly as done by WSC.</p>		<p>1. The effluent to be discharged to sewer by ENE is exclusively domestic sewage i.e. effluent resulting exclusively from activities related to the habitation of humans, such as the use of toilets, wash hand basins, showers and kitchen facilities. Our response shall reflect this statement.</p>	<p>1. N/A</p> <p>2. The FSU WTP is an activated sludge type and the majority of the sludge is returned to the first tank. It is estimated that every five years we will have circa 6 litres of sludge. We</p>	<p><i>that this comment makes reference to the sewer discharge permit and agreed with D3PG that WSC shall be contacted to discuss this issue.</i></p> <p>D3PG reply: D3PG contacted WSC and discussions are ongoing.</p>			

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				will dry this on the FSU and dispose in cake form at landfill as done by and suggested by WSC				
Occupational Health & Safety Authority obo COMAH	The COMAH CA is still in the process of evaluating the safety reports and internal emergency plans submitted by the operators. Also the information to the public has not been submitted by the operators. These are requirements emanating from the COMAH regulations LN 179/2015.	Discussion on submission of these document is ongoing	No further comment.	Operator please note comment Noted	Operator please note comment Noted			
Internal Consultees Feedback								
Environmental Assessment Unit	Currently awaiting the submission of the EIA Note to determine whether an EIA update is required or otherwise. We have no further comments to add on the IPPC-related documents at this point in time.	Noted. The EIA note is also required as part of the IPPC process.	N/A	This will be submitted on the 29 July as discussed.	N/A			
Ecosystems Management Unit	<p>1. The occurrence of flowering within <i>Posidonia oceanica</i> meadows observed during the 3rd monitoring year was noted in the Ecological Reports provided. Although this is an episodic event, is may also be indicative of stress caused by temperature changes, plausible in view of the thermal effluence in the site. The ecological survey reports that "...the frequency of such an occurrence has been adopted by a number of scientific bodies (e.g. CIESM) as an indicator of climate change impacts on marine ecosystems. This must be considered within the context of recent changes in the volume of thermal effluent discharged within the Hofra iż-Żgħira embayment."</p> <p>We would thus recommend that this condition be carefully monitored/reported in future surveys.</p> <p>2. Trends were reported using histograms for seagrass phenological characteristics (shoot density, epiphyte loads, LAI values and % necrosis). In the long-term reporting on such trends without using any kind of statistical approach to confirm if trends are significant or not may not be so scientifically correct. Attention to Figure 14 in the attached document is made. Shoot density for <i>P. oceanica</i> does seem to exhibit a reduction over the last two years. It is also noted that this pattern is also exhibited in the control site, meaning that it is either a natural pattern of the plant, or an indication of pressures at play at other scales. It is highlighted that these parameters are captured by the PREI index, which ERA is using for WFD and MSFD purposes to determine status of BQE in the case of WFD</p>	<p>1. Noted. Operators shall be required to continue with the ecological survey at il-Hofra iż-Żgħira and asses whether such observations still apply.</p> <p>2. Noted. This issue will be addressed to permit conditions. Once the IPPC permit is draft, the unit will be consulted in this regard.</p>	<p>1. Comments noted.</p> <p>2. Comments noted.</p>	<p>1. Operator please note comment. Noted</p> <p>2. Noted</p>	<p>1. Operator please note comment. Noted</p> <p>2. Noted</p>	No further queries from Nature and Ecosystems Management teams		

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						Enemalta	EGM	D3PG
	<p>and habitat condition in the case of MSFD. And the boundaries between good and poor status have been defined for this particular index through the WFD intercalibration exercise. In this regard it is recommended that a condition for monitoring is set specifying that rather than trends, the PREI index against the WFD intercalibrated boundaries to determine whether there is a regression in the condition of the habitat due to hydrographical changes or otherwise.</p> <p>3. Furthermore could Unit A kindly advise what happens if we determine that there is an impact on <i>Posidonia</i> beds in the longer term?</p> <p>4. With regards to emissions to sea it is our understanding that this has already been tackled as part of the WFD processes.</p>	<p>3. Through discussions with ERA, the operator will be requested to submit a proposal for mitigation of this impact, as part of the IPPC permit.</p> <p>4. As part of the IPPC permit, the operator will be required to carry out monitoring of emissions to the marine environment to ensure compliance with ELVs set out under the WFD. The unit will be consulted on the parameters to be monitored during the drafting of the permit.</p>	<p>3. Comments noted.</p> <p>4. Comments noted.</p>	<p>3. Noted</p> <p>4. Noted</p>	<p>3. Noted</p> <p>4. Noted</p>			
<b>Waste, Air, Radiation &amp; Noise</b>  <b>Air Quality Team</b>	<p>1. Assessment as to whether BAM shall be continued or replaced by an updated to the air dispersion modelling (showing actual measurements from the operational plants) should be considered as part of the permit conditions.</p> <p>2. All operators are to note the following additional compliance criterion: 95 % of all the validated hourly average values over the year do not exceed 200 % of the relevant emission limit values (this applies to GTs only).</p> <p>3. EGM: Certificates of conformity to QAL1 for the CEMS were provided for CO NO SO2 Why is it that TSP was not included? With regard to the NO measurement, kindly confirm that equipment can provided data on NO<sub>2</sub>.</p>	<p>1. ERA shall determine the appropriate type of air monitoring required in order to assess the impact from the installation as a whole.</p> <p>2. This requirement shall be included through permit conditions.</p> <p>3. EGM to provide feedback in this regard.</p>	<p>1. Comment noted.</p> <p>2. Comment noted.</p> <p>3. N/A</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. PM is not monitored in D4PP since PM emissions are not expected from use of NG fuel.  The CEMS will include a NO<sub>2</sub> catalytic converter</p>	<p>1. Noted.</p> <p>2. Noted</p> <p>3. N/A</p>		<p>3. EGM is to note that what is required is that all NO<sub>x</sub> in the flue gas is reported as NO<sub>2</sub>. The reply is clear in</p>	



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Waste Management Team	<p>1. <b>D3PG:</b> Comments on the Site Waste Management Plan Annexed to IPPC Form C Report refer:</p> <ul style="list-style-type: none"> <li>Page 9 – definitions on inert and disposal are incorrect. Waste glass-based fibrous material are only considered to be inert if they do not contain any organic binders.</li> <li>Some general comments on the wastes listed in the table: <ul style="list-style-type: none"> <li>Even though gypsum based waste may classify as non-hazardous it is not a permitted waste stream in the Ghallis permit.</li> <li>With reference to transformer oils under EWC 13 03 10*, it is to be confirmed whether or not the latter oils contain polychlorinated biphenyls (PCBs) or polychlorinated triphenyls (PCTs) o For WEEE, the operator is to confirm the non-hazardous nature of the waste as EWC 16 02 14 is a mirror code.</li> <li>For insulation/mineral wool, the operator is to confirm the non-hazardous nature of the waste as EWC 17 06 04 is a mirror code.</li> <li>Calcium silicate and ceramic fibres classified under EWC 17 06 03*, cannot be landfilled at Ghallis as Ghallis is not permitted to accept hazardous waste.</li> <li>The code used for the refractory is a mirror entry and therefore the operator is to confirm its non-hazardous nature.</li> <li>Fibreglass is only considered to be inert if it does not contain any organic binders.</li> </ul> </li> </ul>	<p>1. Updates to the waste management plan referred to the in comments shall be carried out during the lifetime of the permit in view that this forms part of the decommissioning plan.</p>	1. Comment noted.	<p>in which the NO<sub>2</sub> will be reduced to NO and so only a NO analyser is required. This is in accordance with generally accepted industry practice.</p>  <p>D_CG2_EN.pdf</p>			<p>that the inclusion of the reducing unit will enable the conversion of NO2 to NO and hence it is measured.</p>	
	<p>2. EGM:</p> <p>a. Definite final destinations of all the waste streams envisaged must be communicated.</p> <p>b. Final list of the chosen contractors as stipulated must be submitted.</p>	<p>2. EGM kindly provide reply to feedback.</p>	2. N/A	<p>2.</p> <p>a) Agreed, these are currently being constructed.</p> <p>b) Agreed, these are</p>	<p>1. This extract is not taken from the D3PG Waste Management Plan.</p> <p>2. N/A</p>		<p>2.</p> <p>a. Noted. These are to be communicated prior to issue of permit.</p> <p>b. Noted.</p>	<p>1. Noted</p>

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	<p>c. Where and how waste from maintenance on interceptors be stored and its final destination?</p> <p>d. All cesspits must be certified as leak proof prior to first use and routine certification must be agreed upon.</p> <p>e. How will boiler wash downs waste/s be processed and dried and its</p>			<p>currently being contracted.</p> <p>c) Waste from the Oil Separators will be stored within the oil compartment of the Oil Separator, which is fitted with an OilSET 1000 Oil Separator Alarm Device which indicates when it is time to empty the oil separator and thus prevents harmful hydrocarbon emissions. The oil will be removed for off-site disposal directly from this compartment.</p> <div><p>MAR-014 Rev05 Oil Separator_signAPi.pc</p></div> <p>d) Agreed. The Regas Plant Cess Pit is currently still being constructed.</p> <p>e) The wash down</p>			<p>These are to be communicated prior to issue of permit.</p> <p>c. Noted.</p> <p>d. All pits must be certified prior first use and then again re-certified every 36-48 months thereafter. A permit condition in this regard shall be included</p> <p>e. Please see</p>	


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	<p>final destination?</p> <p>f. Kindly clarify what exactly waste/s from the gas storage vessel is and how it will be managed. Kindly provide detailed information regarding this.</p> <p>g. Where will the barges with sludge be taken and disposed off?</p>			<p>waste will be collected in the black water pit and then removed from site via tanker</p> <p>f) Refer to section B030101 for details of the waste generated by the FFSU. This will be stored on/in identified waste management areas or identified tanks, inaccordance with the FSU Waste Management Plan document ref OPS-MALT-ALM-ENV-PLN-0002, prior to being removed via barge for licenced disposal.</p> <p>g) This will be circa 6 litres every five years, and will be taken to a licenced sewage treatment plant. Final details to be confirmed in the first few years of operation.</p>			<p>reply to comment d.</p> <p>f. Noted</p> <p>g. No treatment and/or storage of sludge will be permitted on the FSU, yet the final destination of the latter must be communicated at a later stage.</p>	

**The following are the comments by ERA's Environmental Permitting & Industry Unit on pending IPPC issues to the respective operators.**


**1. Enemalta**

Section	ERA Comment	Enemalta reply	ERA comment
C2.8	Further queries may be raised following the completion and submission of all safety studies prior to the public consultation.	Comment noted.	-
C3.1.2	Regarding the waste management area, as per email sent by ERA on 7 July 2016, kindly submit a proposal for an intermediate solution until construction of the new site is completed together with details of the location and timeframe, for ERA's consideration, by when construction of the new waste management area will be concluded. This proposal is to be submitted prior to the start of the public consultation.	Currently being discussed by operators. Waste site locations shall be determined prior to Public Consultation.	ERA to be updated accordingly at the earliest.
C3.4	Drawings DPSXZ-165 and 166 shall be amended once the waste management areas of both Enemalta and EGM are identified. This shall also include any updates required in relation to the treatment of effluent from the respective waste site, prior to discharge to the marine environment. In this regard, updates regarding the ownership and the area of containment routed through the current discharge points 1 and 2 are to be provided.	Comment noted.	ERA to be updated accordingly at the earliest.
C3.5	As per comment in section C3.4, drawings DPSXZ-165 and 166 shall be amended once the waste management areas of both EGM and Enemalta are determined.	Comment noted.	ERA to be updated accordingly at the earliest.
B3.9	Kindly confirm that the noise monitoring methodology has been agreed upon by all operators	Noise monitoring shall be concluded prior to Public Consultation.	Noted. The issue was discussed during the meeting held on 26 July 2016. The only report pending is that from D3PG which shall shortly be submitted.
C3.10	ERA takes note of the request submitted by Enemalta and shall be provided feedback separately on this matter.	Comment noted.	

## 2. EGM

Section	ERA Comment	EGM reply	ERA comment	EGM reply	ERA comment
<b>General comment</b>	Regarding the mobilisation phase of the FSU which has been shortened (0-12 months), and the FSU will possibly be immobilised upon start of operations, kindly include a proviso in sections where the rated thermal input of the FSU main engines is provided. The statement should state that their use shall be limited to the period when the vessel is still mobilised, which might be before operations start.	Noted  FSU main boilers thermal rating was already included in the FSU operating modes table. We have now included the gross thermal rating of the main boilers in section B1.2.  <i>“Thus during the first year of service (Phase 1 FSU mobilised), the main boiler (rated at 58.5MWth) will be kept cold predominantly and the aux boiler will be off-line and preserved. The main boilers will operate as follow”</i>	Reference B102:  The comment was meant to include a proviso that the use of the main boilers shall only be limited in case the storm mooring is not yet complete and the vessel is mobilised. The text does not make reference to the fact that this might not be the case prior to start of operations.	Please see suggested updated text accordingly. We will subsequently change B2.2.1 accordingly if this update is acceptable to ERA.   <b>B0102 Updated 2 Aug</b> in response to EI	Noted.  This update may also be required in other sections which make reference to the phase 1 and phase 2.
B1.2	<b>CCGT Power Plant Description</b> 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 containment. With regards to the EDG, kindly note that the area where this is placed will have to be bunded.  Kindly confirm that the requested containment arrangements will be in place upon start of operation.	Kindly note item 13 (corrosion inhibitor for closed cooling water) shall be fully bunded.	Noted. Kindly update relevant section with the containment details.	The section was updated previously; refer to table on page 14 of the updated section B1.2, attached above.	Noted.
B2.2.1	With regards to the use of net and gross rated thermal input, kindly note that the gross value which shall be used for quoting the rated thermal input and determining applicable emission limit values for the respective combustion plant.	Noted, updated	The updates of the rated thermal input for all generating units are noted.  With regards to the updated rated thermal input of the CCGT , kindly provide details the rated electrical equivalent of the total rated thermal input (411MWth) as provided in table in document B306. Operator is to note that the IPPC application fee paid by EGM was based on the Net rated thermal input. Request for additional payment shall be requested by ERA through a separate letter.	The rated output for the D4 full closed cycle operation is 205MWe.  This is based on full operation and full air inlet chilling using the water/glycol loop from the Regas Plant. (the previously quoted gross thermal ratings of the GTs was based on no air inlet chilling) and corresponds to a gross thermal input of 144 to each GT. See updated B0102 above	The rated thermal input in table B1.2 as well as document B306, still make reference to 137MWth.  Kindly ensure that the quoted value of 144MWth is updated in all relevant documents once submission of the consolidated application is made.
B2.2.2	<b>CCGT Power Plant</b> Section may need to be updated once the Air Quality Studies as part of the EIA are concluded and reviewed by ERA.	Noted			
B2.2.4	<b>BAT Comparison</b>				

Section	ERA Comment	EGM reply	ERA comment	EGM reply	ERA comment
	<p><b><u>I. Emissions from Storage</u></b></p> <p><b>1.2 Storage of packaged dangerous substances</b></p> <p>1. In view that this section has now been compiled, kindly clarify whether there will be storage of packaged dangerous substances on site? This section applies to other stored materials on site (land based)?</p> <p>2. Kindly provide information if such materials are stored by other operators.</p> <p><b>1.7 Floating Storage</b></p> <p>Kindly update document with the outcome of the safety studies once these are concluded.</p> <p><b><u>II. Large Combustion Plants</u></b></p> <p><b>Part 4 – dust and SO<sub>2</sub> emissions from gas fired combustion plants</b></p> <p>Further comments may ensue following updates to the Air dispersion model forming part of the EIA in relation to SOx.</p> <p><b>Part 4 - NOX and CO emissions from gas-fired combustion plants</b></p> <p><b><u>III. Industrial Cooling Systems</u></b></p> <p><b>5. Reduction of emissions to water</b></p> <p><b>General BAT approach to reduce chemical emissions to water</b> - Noted</p>	<p>I</p> <p>1.2) Please note Raw material storage within new development is described in section B2.3. We do not foresee any packaged substance to be stored by other</p> <p>1.7) Noted</p> <p>II</p> <p>The SOx emission study is in progress and will be submitted by the 29th of July</p> <p>Closed</p> <p>III</p> <p>Closed</p>	<p>1.2 Relevant BAT comparison is to be updated accordingly.</p> <p>Noted.</p>		
B2.3	Regarding document B0203, the inclusions of the <i>Maximum volume stored on site</i> in the respective tables is noted.	Closed			
B2.8	Further queries may be raised following the completion and submission of all safety studies	Noted			
B3.1.1	Regarding document B030101, the EWC code for the waste resin is noted.	Closed			
B3.1.2	Regarding the waste management area, kindly confirm the final area and provide a date by when construction will be concluded. This shall also include any updates required in relation to the treatment of effluent from the respective waste site, prior to discharge to the marine	Discussions being finalised with Enemalta	ERA to be updated accordingly at the earliest.		

Section	ERA Comment	EGM reply	ERA comment	EGM reply	ERA comment
	environment.				
B3.1.3	Regarding document B030103, reference to local hazardous waste storage area at Ghallis is to be amended in all relevant sections.	B030103 updated	Noted. Kindly provide an update with the final disposal location once contracts have been finalised.		
B3.3.1	Acknowledgement from WSC in relation to the application for the sewer discharge permit is noted. Further queries may arise following response to comments raised by WSC as part of the regulatory consultation.	Noted			
B3.4	Update of legend in drawing ENEM-URS-E0-00-DR-ME-00113 is noted.  As per comment in section B3.1.2, kindly provide details on the discharge from the waste management area which was previously used by Enemalta since this has not yet been included as a discharge point. Drawings shall be amended once waste management areas of both EGM and ENE are determined and established including details on treatment prior to discharge. Kindly refer to ERA's comment June 2016 in document <i>ERA 6<sup>th</sup> review final 150616</i> .	Agreed, this shall be updated on conclusion of discussions with Enemalta.	ERA to be updated accordingly at the earliest.		
B3.6	Inclusion of the NVCC as an emission point has been noted.  Further comments may ensue following updates to the Air dispersion model forming part of the EIA.	Noted  Kindly note NVCC is not included in the final Air Dispersion model as this does not (in the emergency case when NG will not be flowing to the power plants) represent the worst scenario for emission dispersion.	Comment related to the air dispersion model is referring to the whole section of the IPPC application and not specifically to the emissions from the NVCC.	Noted. Updated air dispersion model issued with updated EIA statement,	Noted. ERA feedback regarding the air dispersion model shall be presented as part of EIS update.
B3.9	Kindly confirm whether agreement on the combined noise monitoring which will be lead by Enemalta has been agreed upon.	Confirmed; this has been agreed with Enemalta.  An agreement has been reached and the method statement is attached herein   IPPC Delimara Power Station - EGM Noise I	Noted.		
B3.10	<b>Monitoring of emissions to air</b> Regarding the emissions inventory table in document B0306 kindly note the following: 1. Concentration SO <sub>2</sub> for the FSU auxiliary	1) Included	1. Noted.		

Section	ERA Comment	EGM reply	ERA comment	EGM reply	ERA comment
	<p>boiler is to be provided and not assumed to be equal to the max S concentration in the natural gas.</p> <p>2. With regards to the FSU spare emergency diesel gen-set (point source 8B in table included in document B0306), the estimated running hours is given as 4hr/yr whilst in the emissions inventory table, the estimated hours of operation is given as 120hr/yr. Kindly provide a clarification on this issue and update relevant sections accordingly.</p> <p>3. With regards to the emissions profile for the FSU spare emergency diesel gen-set, kindly note that in accordance with the Medium Combustion Plants Directive, the emissions of NOx exceed the emission limit value which are to be achieved by 1 January 2030. However, kindly note that the Authority may exempt compliance with the ELV depending on the operating hours. This issue shall be further discussed during the drafting of the IPPC permit.</p> <p>4. SO<sub>2</sub> emissions for the Delimara 3 GRS gas boilers 1 and 2 are to be provided.</p>	<p>2) Kindly note the service diesel genset with estimated operating hours of 120hr/yr included in the inventory table refer to the emission source 9. The name has been updated for clarity.</p> <p>3) Noted</p> <p>4) Included</p>	2. Noted		
B9.1	Revisions of budget allocations are noted. With regards to the Ecological survey at Hofra z-Zghira, kindly note that contribution towards the study is to be made by all operators in view that all operators are discharge cooling waters into the marine environment.	Agreed and updated.	Noted		

### 3. D3PG

Section	ERA Comment	D3PG reply	ERA comment	D3PG reply	ERA reply
C2.8	Regarding the boiler risk assessment, kindly indicate whether this document has been submitted to the COMAH CA for review as part of the safety studies review currently being undertaken by the COMAH CA consultant.	The document has been submitted to OHSA.	Noted.		
C3.9	Kindly confirm whether agreement on the combined noise monitoring which will be lead by Enemalta has been agreed upon.	The combined noise monitoring and method statement has been drafted and is in the process of being agreed upon.	Document is to be submitted to ERA at the earliest.	D3PG has agreed to the combined noise monitoring method statement. D3PG is only seeking some further explanation on	Noted. The method statement is to be submitted prior to public consultation.



				the definitions of ambient and background noise as proposed by the consultant.	
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