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SOP-234

Environmental Complaints Procedure (Coordinated)

Last Review Details – Refer to QPulse for full history

Review Comments	Review Owner	Date
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1 Aim and scope

The objective of this procedure is to determine the method for handling, addressing, and implementing corrective actions for environmentally related complaints in the neighbourhood of Delimara Power Station and the surrounding areas in the villages of Marsaxlokk and Birzebbugia.

2 References


IPPC Permit IP 0002/07 – Framework Permit (latest revision)

3 Terms and Definitions

D3PG	Delimara 3 Power Generation Ltd
EGM	ElectroGas Malta Ltd
ENE	Enemalta plc
ERA	Environmental Resources Authority
IPPC	Integrated Pollution Prevention and Control
GIS	Geographic Information System
SAP	Systems, Applications & Products implementation software used to track customer and business interactions

4 Responsibilities

Environmental Coordinator	Responsible for communication with the Customer Care Representative, IPPC Coordinator and to follow up on any environmental issues or complaints and confirm that corrective actions implemented are effective
IPPC Coordinator	co-ordinates between the three operators (ENE, D3PG and EGM) operating at the DPS site, the contractor and the local authority and collaborates with the Environmental Coordinator
Plant Responsible	responsible for the day-to-day running of the plant and has the authority to implement any necessary corrective actions
Station Responsible	for the scope of this SOP takes on the responsibilities and obligations of the station manager
Plant Representative	nominated person representing the plant and the station responsible
Enemalta Customer Care Representative	Responsible for communicating with the general public and registers all the details related to a complaint in the environmental complaints register and SAP

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5 Frequency

This document should be reviewed and updated every twenty-four (24) months, unless it is deemed necessary that it should be reviewed prior.

6 Detailed Procedural Rules

Method

- 1) Environmental Complaints may be received either by phone, via email, via Enemalta's website "Contact us", via the local council reporting system, through the media or through the local authority responsible for the environment.
- 2) If the complaint is received by phone the person registering the call shall ask the caller if he/she would like to give his/her personal details such as name, address, ID card number, email address and mobile number. The customer may opt not to divulge such information however this information would be beneficial especially for complaints where follow up is required or where the information given is not complete and further details would be required to help in the investigation of the root cause. The person taking the call shall ask the Customer relevant questions such as when the problem was first detected whether a similar complaint had already been made in the past, the duration of the nuisance/inconvenience, or whether a pattern had been detected.
- 3) If the complaint is received via other channels, for example via email or through Enemalta website the responsible person who would be investigating the complaint might request Enemalta Customer Care Representative to contact the customer and see if he/she is willing to forward a contact number or address. This is especially required for those complaints where the person carrying out the investigation would need to contact the complainant for specific details or if follow up is required at a later stage.
- 4) When the complaint is received through Enemalta's Customer Care Section, Enemalta Customer Care Representative shall register the information related to the complaint in the system. The system will then generate automatically a unique 9-digit notification number for the complaint. Enemalta Customer Care Representative shall also register the complaint in the "Environmental Complaints" excel file which is kept by Enemalta Customer Care Section on the Enemalta server

Access to this folder has been granted also to Enemalta Environmental Coordinator to be able to follow up on the complaint and liaise between the sections concerned.

- 5) If the complaint is received by anyone from the other two operators or any employee from Enemalta outside Enemalta Customer Care Section, the person receiving the complaint is to

instruct the complainant to contact Enemalta Customer Care Section straight away to register the complaint. Enemalta Customer Care Section will then forward the complaint to Enemalta Environmental Coordinator, who in turn will notify Enemalta IPPC Coordinator of the complaint. The latter will then inform the responsible of the other 2 plants at DPS i.e. D3PG and ElectroGas Malta of the complaint and together start the procedure to find the root cause and implement corrective actions


- 6) If the complaint is received via the authority then ownership will be assigned to Enemalta IPPC Coordinator who will coordinate the investigations together with Enemalta Environmental Coordinator and the responsible of the plants at DPS.
- 7) The authority should always address environmental complaints related to the DPS site to Enemalta IPPC Coordinator whenever the complaint is related to any one of the aspects which have been identified as being common to all three operators.
- 8) In this case Enemalta IPPC Coordinator will register the complaint in the excel file dedicated for complaints by authority named "Environmental Complaints by Authorities" which is found on the Enemalta server

Enemalta IPPC Coordinator together with Enemalta Environmental Coordinator will set up a working group whose members shall include representatives from the other two plants, D3PG Ltd and ElectroGas Malta Ltd to address this problem, find the root cause and identify the corrective actions that need to be implemented.

If the complaint results in emissions/leakages to air, sea or ground that are common to any 2 or to all 3 operators then Enemalta IPPC Coordinator shall fill in Schedule 3 of the IPPC permit and send it to the local authority within 24 hours. (Refer to **Annex 1**).

- 9) If any of the details related to the complaint mentioned in (2) above are missing, Enemalta IPPC Coordinator will contact the local authority for the missing information.
- 10) Once all details for the complaint are received the investigation can start.
- 11) The responsible for the operations for each plant ie Enemalta, D3PG and ElectroGas Malta, are to confirm whether any operations carried out within the past week especially within the last 96 hours could have resulted in such a complaint.
- 12) If the evidence and data available shows that the complaint was not a result of any of the processes being carried out by any one of the operators operating at DPS, then the complaint will not be confirmed and the person who had placed the complaint shall be notified via Enemalta Customer Care Section or by Enemalta IPPC Coordinator depending on who had opened the complaint, that the complaint is not confirmed.

The complaint will be closed in the system and in the Environmental Complaints file if this was received via Enemalta Customer Care Section or in the excel file for Complaints from Authority as "Not Confirmed" if received by Enemalta IPPC Coordinator from the authority.

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- 13) If the complaint is confirmed and the source for the complaint is identified to be a process being carried out by any one or more of the 3 operators at Delimara then the person who had placed the complaint will be informed by Enemalta Customer Care Section or by Enemalta IPPC Coordinator depending on who had placed the complaint, of the findings and that corrective actions will be implemented to rectify the problem and avoid further recurrences.
- 14) Once corrective actions are implemented and confirmed to be effective by Enemalta Environmental Coordinator and Enemalta IPPC Coordinator, Enemalta Customer Care Section will be notified by Enemalta Environmental Coordinator to close the complaint in the Environmental excel file and in the system. If the complaint was received from the authority, then Enemalta IPPC Coordinator will close the complaint in the file for Complaints from Authority.
- 15) In the case of complaints which were forwarded by the authority, Schedule 3 will then be updated by Enemalta IPPC coordinator with findings, signed and sent to the local authority.
- 16) Once the root cause is clearly identified and the problem attributed to a specific plant the IPPC permit responsible of that plant shall follow up on the complaint and fill a separate Schedule 3 pertaining to the respective plant's IPPC permit.
- 17) When the corrective actions have been implemented, the responsible of the IPPC permit of the plant shall update Schedule 3, close it and send it to the local authority.
- 18) The IPPC permit responsible of the plant shall inform Enemalta IPPC coordinator when the corrective actions have been implemented and when Schedule 3 has been closed and sent to the local authority.
- 19) Enemalta IPPC coordinator shall also inform the local authority that the complaint has been closed by the respective operator. |

7 Reference documents

|N/A

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Annex 1

Schedule 3

Notification of abnormal emissions

This page outlines the information that the Operator must provide to satisfy conditions 2.3.12.3.2.1 and 2.3.12.3.2.2 of this Permit.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the Industrial Emissions (IPPC) Regulations.

Part A

Permit Number	
Name of Operator	
Location of Installation	
Location of the emission	
Time and date of the emission	

Substance(s) emitted	Media (e.g. air, groundwater)	Best estimate of the quantity or the rate of emission (include units)	Time between which the emission took place

Measures taken, or intended to be taken, to stop the emission	
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Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment and any public health risk or harm which has been or may be caused by the emission.	
The dates of any unauthorised emissions from the installation in the preceding 24 months.	



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Name ¹	
I.D. Card No./Passport No.	
Post	
Signature	
Date	

¹ authorised to sign on behalf of Operator