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## SOP-256





# Procedure for Analysing, Reporting and Following-up on odour complaints (Co-ordinated)

**Last Review Details – Refer to QPulse for full history**

Review Comments	Review Owner	Date
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**Latest Revision Details – Refer to QPulse for full history**

Revision number	Revision Details
1	Included the operation shore-to-ship in 6.1 Item 14

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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 complaints related to odour in the neighbourhood of Delimara Power Station and the surrounding areas of the village of Marsaxlokk.

## 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

IPPC Coordinator	co-ordinates between the three operators (ENE, D3PG and EGM) operating at the DPS site, the contractor and the local authority
Station Manager	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

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Customer Care Representative responsible for communicating with the general public and register all the details related to a complaint in the environmental complaints register

Environmental Coordinator responsible for communicating 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.





## 5 Frequency

This document shall be revised annually

## 6 Detailed procedural rules

### 6.1 Method

1. Odour complaints will follow the same procedure as any other customer complaint.
2. 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.
3. If the complaint is received by phone the person registering the call shall ask the caller to identify himself/herself by giving personal details such as name, address, ID card number, email address and mobile number (if any) and relevant details related to the complaint which will help in the investigation.
4. Relevant questions could be if the odour was strong or persistent; if it could be compared to any other smell; the duration of the smell, the date and the time that the complainant was first aware of the odour.
5. If the complaint is received via other channels, via email for example, the details mentioned in (4) above are still required. The Customer Care representative will contact the complainant to provide the necessary details mentioned in (4) above if these are missing in the original communication.
6. When the complaint is received through Enemalta's Customer Care section the 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. The Customer Care Representative shall also register the complaint in the "Environmental Compliants" excel file which is kept by the Customer Care section on the Enemalta server.





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Access to this folder has been also granted to the Environmental Coordinator.

7. Following registration of the complaint Customer Care Representative will forward the complaint to the Environmental Coordinator who in turn will forward it to the IPPC Coordinator and the responsible of all the 3 plants at DPS ie Enemalta, D3PG and Electrogas Malta. Together with the IPPC Coordinator the Environmental Coordinator will follow up on investigations, identification of root cause and implementation of corrective actions.
8. If the complaint is not received through the Customer Care section but through a different channel, the person receiving the complaint shall ensure that the complaint is forwarded to the responsible of the 3 plants at DPS ie Enemalta, D3PG, Electrogas Malta as well as to the IPPC Coordinator and the Environmental Coordinator.
9. If the complaint is received via the authority then ownership will be assigned to the IPPC Coordinator who will coordinate the investigations together with the Environmental Coordinator and the responsible of the plants at DPS.
10. In this case the IPPC Coordinator will register the complaint in the excel file specifically for complaints by authority named "Environmental Complaints by external entities" which is found on the Enemalta server and fill in the first part of Schedule 3 of the IPPC permit with the details available and send it to the local authority within 24 hours.

Refer to Annex 1.

11. If any of the details mentioned in (4) above are missing the IPPC Coordinator will contact the local authority for further information
12. Once all details for the complaint are received the investigation can start.
13. The station managers or station responsible for the plant for all 3 operators, are to confirm whether any operations which could have released any type of odour were carried out on the day and at the time registered in the complaint.
14. Fuel consignments or fuel transfers are to be checked to see if any ship-to-ship, ship-to-shore or shore-to-ship transfers were carried out at the time of the complaint.
15. The IPPC Coordinator shall check the wind direction from the data of the anemometer installed at DPS or if this is not functioning, from data obtained from the Meteorological Office Luqa, on the day and especially at the time registered in the complaint in order to

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get the wind direction to confirm if the wind was blowing inwards toward the plants or outwards towards the village of Marsaxlokk, Qajjenza and Birzebbugia.





16. Once all these details are available one can confirm or otherwise if the odour was a result of an operational activity being carried out at any of the plants at DPS or through fuel transfers being carried out at the site.
17. If the source of the odour is identified to be generated from any of the processes at any one of the plants at DPS or through fuel transfers for any of the plants, the station manager or the responsible of the plant has to implement corrective actions such as abatement measures to counteract the effect of the process causing the odour.
18. If the evidence and data available shows that the source of the odour was not being caused by any of the operations of the plants at DPS then the complaint will not be confirmed and the person who had placed the complaint shall be notified via Customer Care section or by the IPPC Coordinator depending on who is the complainant, that the complaint is not confirmed.

The complaint will be closed in the system and in the environmental complaints file or in the excel file for complaints from authority as “Not Confirmed”.

19. If on the other hand the complaint is confirmed, then the person who had placed the complaint will be informed by Customer Care section or by the IPPC Coordinator depending on who had lodged the complaint, of the findings and that corrective actions will be implemented to rectify the problem and avoid further recurrences.
20. Once corrective actions are implemented and confirmed to be effective the complaint will be closed in the excel file and in the system.
21. In the case of complaints forwarded by the authority Schedule 3 of the IPPC permit (refer to Annex 1), is to be filled in within 24 hours that the complaint is received and then updated with findings and implementation of corrective actions accordingly and sent to the authority when the complaint has been closed.

## 1. 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. groundwater) <i>air,</i>	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.	
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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.	

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

<sup>1</sup> authorised to sign on behalf of Operator