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SOP-174

DPS Coordinated Emergency Response Plan (CERP)

1 Aim and Scope

1.1 Aim

This Coordinated Emergency Response Plan (CERP) defines the coordinated actions that will be taken by ENEMALTA plc and its subsidiary IESC, ELECTROGAS MALTA Ltd and D3 Power Generation Ltd (Operators), during an emergency situation. The CERP includes protocols to ensure communication and close coordination between Operators and with local area emergency response organizations and authority. The objective is to be prepared to:

- Ensure safety of own and others' personnel and prevent fatalities and injuries.
- Reduce damage to buildings, facilities and equipment.
- Avoiding or minimising damage to third party property and financial loss.
- Minimising or avoiding loss of supply to consumers.
- Protect the environment and the community.
- Speed up the resumption of normal operations.

1.2 Scope

The CERP includes:

- Definition of accident levels and list of scenarios
- Site internal communication channels and procedures between operators
- External communication channels and procedures with CPD and COMAH sirens
- Material resources
- Implementation of CERP through training and drills

1.3 Exclusions

The CERP does not include:

- Communication channels and procedures between the operator affected by the emergency and the Emergency Services (112 / CPD)
- Emergency procedures for each ERT
- Human resources allocated to each ERP
- Internal drills
- Reporting templates

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All abovementioned contents are addressed in each operator's ERP.

1.4 CERP scope (when to apply this plan)

The CERP is applicable to any major accident, accident, incident, occupational injury, near miss which may occur at the Delimara Power Station site, independently of the location, substance, personnel, Operator, Unit or O&M contractor involved.

The Operators included in the CERP are ENEMALTA plc and its subsidiary IESC Ltd, ELECTROGAS MALTA Ltd and D3 Power Generation Ltd. They are supported by O&M contractors, ESB International, Bumi Armada, and Reganosa Malta.

The level of application shall be at least the communication of the emergency situation, with a possible escalation to the full activation of the CERP as described afterwards.

The CERP is a common procedure to be followed by all the Operators as an additional tool. The activation of the CERP will not replace the activation of the internal ERP for each Operator. The roles, responsibilities and procedures included in the CERP shall be intended as additional to each internal ERP. A full understanding of the CERP is only possible in combination with the internal ERP applicable at each Operator. Each CERP copy shall be maintained together with the corresponding ERP applicable in the location. For those topics not mentioned in the CERP, reference shall be made to the ERP of each Operator.

2 References

L.N. 179 of 2015: OCCUPATIONAL HEALTH AND SAFETY AUTHORITY ACT (CAP. 424) Control of Major Accident Hazards Regulations, 2015

L.N. 44 of 2002: OCCUPATIONAL HEALTH AND SAFETY AUTHORITY: Work Place (Minimum Health and Safety Requirements) Regulations, 2002

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3 EMERGENCY CATEGORISATION

3.1 EMERGENCY LEVELS

The CERP summarizes the levels of emergency used in each Operator's ERP as well as the common levels agreed for the CERP.

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3.2 EMERGENCY SCENARIOS

Although emergencies by definition are unexpected events, their occurrence can be predicted with some degree of certainty, through the experience gained by the investigation of past accidents, the identification of the possible hazards and the assessment of the risk. For the purposes of this document five categories of hazards have been considered:

Major accident (or process accident): Analysed in the Safety Report. Are usually caused by the process and operations carried out in the facility and specifically related to the handling of hazardous materials.

Other industrial events: Analysed in the HAZID study and they are due to other causes apart from the handling of hazardous materials.

ISPS / External events: Caused by events outside of the facility and analysed within the HAZID study. Could be caused by environmental events and by human activities (intentional or not).

Medical emergencies and Occupational injuries: event linked to personnel activities that can lead to different kind of emergencies and that involve the employee's safety at work.

Near misses: event that does not have consequences neither on persons nor on the structures, but is very useful to be analysed and recorded because it may provide information to prevent future accidents.

3.3 MATERIAL RESOURCES

The material resources allocated to the CERP are all the resources available in the common areas within the site, i.e. those resources located in the internal roads between the main gate and the units. All these resources including fire extinguishers, hydrants and fire-fighting network are available, provided that the emergency is located in proximity of the resources and their usage is informed to the Enemalta CCR. Enemalta is responsible for the maintenance of these resources and will replace them after usage, reserving the right to invoice the costs to the user. A full list of resources available at ENEMALTA is included in a specific procedure.

3.4 COMAH SIRENS

Two COMAH sirens to alert the population offsite are available:

- One is located within ENEMALTA premises, on top of the CCR building and facing Delimara point
- One is located within EGM premises, on D4 structures and facing Marsaxlokk village

The local population has been sent leaflets (also available on the EGM and ENE websites) with the actions to be taken in case alarm is sounded.

Sirens are to advise the General population of Marsaxlokk and surrounding areas, including visitors.

Both sirens are to be sounded together (to give better coverage as each siren has it's strong/weak areas).

Sirens will be sounded in case of a major emergency but only **on the orders of the CPD Incident Commander.**

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All clear instruction will also be given by the CPD Incident Commander.

3.5 HUMAN RESOURCES

The human resources allocated to the CERP are defined in the internal ERP at each single Unit. No additional resources are specifically allocated. The same resources, with the same roles as per their internal ERP are requested to join the CERP once activated.

No resources will be exchanged, transferred, hired or provided between, to or from Operators at the site in case of emergency. Human resources have to cooperate as described in this document, by means of full cooperation in the communication and decision-making processes.

4 Frequency

The plan should be revised when shortcomings have become known, and should be reviewed at least once every 3 years. The plan should be updated when there are changes in facility infrastructure, processes, materials used, and key personnel.

5 EMERGENCY PROCEDURES

During an emergency, some standard actions are always taken. Common elements to be considered include pre-emergency preparation and provisions for alerting and evacuating staff, handling casualties, and controlling the hazards. They can be defined using simple and standard procedures, in order to minimize the effort and maximize the efficiency. The following emergency procedures shall be followed in addition to the ones included in the individual ERPs.

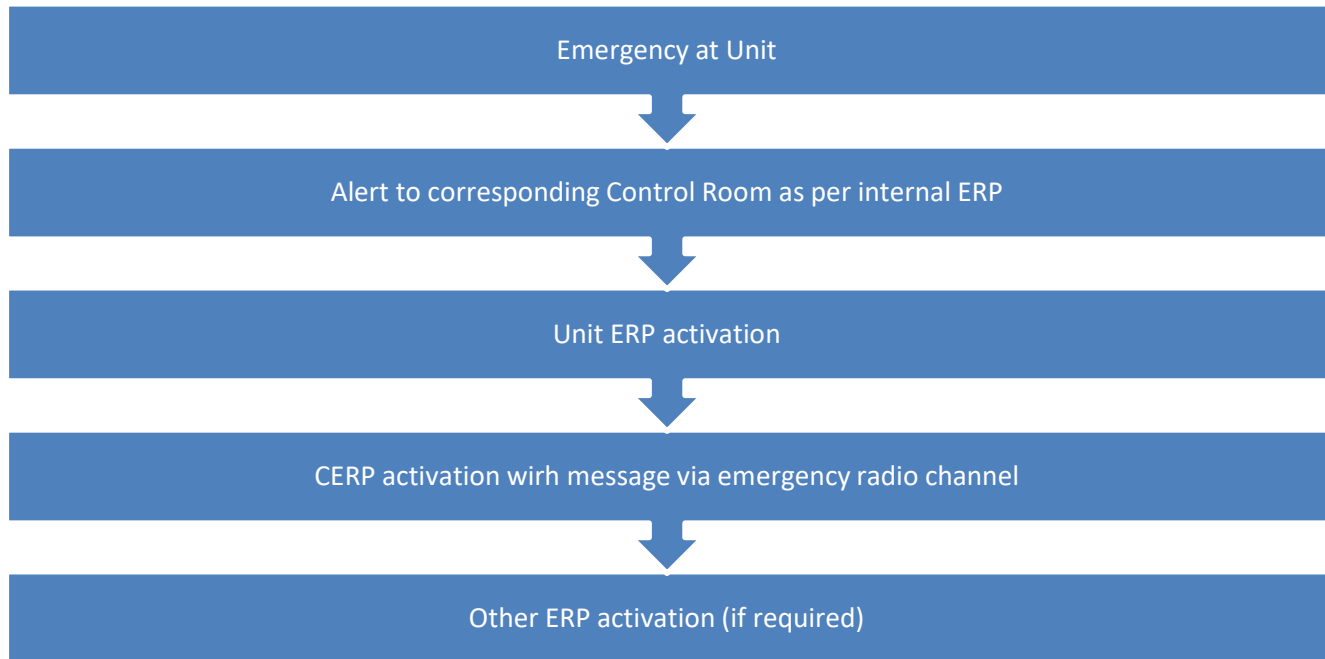
5.1 EVENT DETECTION AND ALERT TO A CONTROL ROOM

Event detection shall be done as described in each single ERP. In general, all emergencies will be detected either by personnel on field or by gas, smoke or other detectors. The channel for communication will in any case lead to the corresponding control room at the affected Unit. Once received there and confirmed, the corresponding ERP will be activated and in parallel, the CERP shall be also activated.

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Figure 1 below summarizes the procedure:

Figure 1 - Emergency Alert Flow



5.2 EMERGENCY PROCEDURE FOR CERP FULL ACTIVATION

At specific emergency levels, the purpose of this procedure is to reduce injuries to people and damages to the environment and properties in case of emergency situations generated by or involving one Operator's activities with a potential effect on another Operator's activities. To do so, it has to identify clearly the staff members who will take responsibility for the strategic and on field decision. The organization of the personnel in case of emergency at those levels is shown in the Organizational charts in each ERP.

The personnel involved include:

- Emergency Advisory Team (EAT)
- Emergency Controllers (EC)
- Forward Controller (FC)
- Emergency Response Team (ERT)
- Main Gate Security Guard Room

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5.3 EMERGENCY PROCEDURES FOR CERP ACTIVATION FOR COMMUNICATION ONLY

In case of specific emergency levels, the purpose of this procedure is the communication of the emergency to other Operators. The affected operator is responsible for tackling the emergency, while other Operators have the right to be informed at all times about the situation.

The organization of the personnel in case of emergency at those levels, is shown in the Organization charts in each ERP. These organizations and roles shall also take on specific responsibilities defined in the CERP.

6 IMPLEMENTATION OF THE PLAN

Completing a comprehensive plan for handling emergencies is a major step towards preventing disasters. However, it is difficult to predict the problems that may happen unless the plan is tested. Exercises and drills may be conducted to practice all or critical portions (such as evacuation) of the plan. A thorough and immediate review after each exercise, drill, or after an actual emergency will point out areas that require improvement.

The goals for correct implementation can be summarized as follows:

- Developing and implementing procedures and incident and emergency protocols
- Providing adequate and ongoing training for personnel
- Conducting desktop and field exercises
- Regular auditing of construction activities
- Ongoing and effective communication
- Ongoing liaison with public authorities
- Identifying new or additional resources and equipment required for effective emergency response
- Identifying new or additional roles and responsibilities of individuals
- Identifying new or additional key personnel and reliable means of contacting them
- Maintaining documentation so potential incidents or emergencies can be properly managed
- Ongoing compliance checks with OHS requirements by Health and Safety Department at each Operator.

6.1 COMAH Exercise

A full-scale exercise shall be performed with the participation of the three Operators and the O&M contractors eventually involved, once every two years. The exercises shall be organized as follows:

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Information / invitation shall be given to CPD and other authorities which may be interested. Full participation of CPD.

A scenario with domino effect to another Operator will be selected.

The scenario will be considered as highest level, the emergency escalated and the CERP fully activated.

6.2 CERP DRILLS

CERP drills shall be performed once a year (except when COMAH exercise is applicable) with the participation of the three Operators and the O&M contractors eventually involved. The exercises shall be organized as follows:

Organization through cooperation between the three Operators and the O&M contractors involved.

Information / invitation shall be given to CPD and other authorities which may be interested. Participation of CPD local resources is expected.

A scenario with domino effect to another Operator will be selected.

The scenario will be considered as second highest-level emergency and the CERP fully activated.

6.3 PERSONNEL TRAINING AND OPERATOR DRILLS

The CERP will not replace the training and drills performed by each Operator following internal procedures. The internal training at each Operator shall include a module covering the interface with the CERP, thus the communication and cooperation with other Operators in case of emergency escalation.

6.4 ANALYSIS AND EVALUATION OF THE ACCIDENTS

Incidents and accidents which have occurred at the site, within any Operator's premises, shall be investigated according to procedure - Incident investigation included in the CSMS.

6.5 CERP REVIEW

The CERP is a classified document and its filing, handling, replication and distribution shall be controlled by ENEMALTA on behalf of the three Operators in accordance with a specific SOP.