

# **ElectroGas Malta Ltd (EGM Ltd)**

## **Application for Renewal and Variation of IPPC permit IP 0002/07/Gi**



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## Introduction & Non-Technical Summary

1. On 27<sup>th</sup> September 2017, the Environment & Resources Authority approved IP00002/07/Gi, to renew the operation of the ElectroGas Malta Ltd (EGM Ltd) D4 power plant and associated Liquefied Natural Gas (LNG) facilities, for a period of four years. The permitted operations include the following activities:
  - *Combustion installations with a rated thermal input exceeding 50 MW using 3 combined cycle gas turbines, and an associated steam turbine*
  - *Associated activity of LNG fuel handling and storage*
  - *Associated activity of regasification and gas pressure reduction*
  - *Associated activity of other combustion plant*
  - *Associated activity of demineralised water polishing from receipt of water from Enemalta to delivery to the utility*
  - *Associated activity of storage, treatment and disposal/recycling of waste materials*
  - *Associated activity of maintenance*
2. This permit renewal and variation seeks the competent authority's consent for:
  - Continued operations of the activities defined above as approved under IP00002/07/Gi; and
  - The approval of various variations as documented in Annex 2.

3. A complete description of the variations is included as Annex 2. Apart from the new ship-to-ship transfers, these variations consist of either upgrades of existing processes<sup>1</sup>, or upgrades to LNG handling facilities to address points noted in COMAH audit processes. These may be summarised as:
- Ship-to-Ship transfer - LNG offloading (offshore bunkering);
  - Glycol expansion tank upgrade;
  - Improved Power Supply Feeder;
  - Addition of FSU Boil-Off Gas Attenuator;
  - Improved bunding of make-up water glycol tank;
  - Introduction of Oily Water Separator at Regasification Site;
  - additional of an oil boom to improve emergency response in case of oil spill;
  - introduction of a fixed sewage connection to the portacabin office facilities;
  - Installation of Chemical Stores used in plant operation/maintenance (at both generation and regasification sites)
  - installation of office facilities as approved by PA/04297/18;
  - updates with respect to use of fluorinated gases on site;
  - Upgrade to reflect changes in fire suppression systems in line with regulations;
  - replacement of a cooling water pump;
  - Removal of AST and QAL 2 testing requirement for GT bypass stacks;
  - the use of an Inert Gas Generator on board the FSU; and
  - changes in the status of the cooling water mixing chamber.
4. **Safety studies:** iterative review of safety issues, including observations and recommendations raised by COMAH audits, have resulted in various improvements to the safety studies and Emergency Response Plan. Furthermore, the variation requesting LNG bunkering has been subject to HAZID and HAZOP studies to identify possible hazards, and consider operational requirements in terms of operability. The results of these studies are being incorporated into updated safety studies as required by the Control of Major Accident Hazards Regulations L.N. 179/2015 [S.L. 424.19] which are being submitted to the OHSA as COMAH lead competent authority.
5. **Environmental Management System (EMS):** the recertification process for ISO 14001:2015 has been successfully concluded in February 2021.

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<sup>1</sup> A proposal to include an upgrade to the gas turbines was included in previous versions of the application, but has since been removed given that further development is required before the proposal is considered sufficiently complete.

6. The application for renewal includes the following documentation (as annexes), to facilitate review of implementation of permit requirements and operations:

- this **Introduction and Non-Technical Summary**
- **Annex 1:** Application forms A & C
- **Annex 2:** List and description of variations.
- **Annex 3:** Plans
- **Annex 4:** Explanatory Notes
- **Annex 5:** LCP BAT conclusions
- **Annex 6:** Certificate of Incorporation
- **Annex 7:** status of improvement programme items raised in the existing permit
- **Annex 8:** changes in the use of raw materials
- **Annex 9:** changes in equipment using ODS or F-gases
- **Annex 10:** updated energy efficiency plan
- **Annex 11:** updated Process Flow diagram
- **Annex 12:** Waste Management
- **Annex 13:** Connection to Sewer
- **Annex 14:** Expenditure Plan
- **Annex 15:** Emissions to Air (MCP Registrations)
- **Annex 16:** Monitoring
- **Annex 17:** Certifications
- **Annex 18:** Permits
- **Annex 19:** Regulatory Consultation
- **Annex 20:** OTNOC Plan
- **Annex 21:** Performance Test
- **Annex 22:** Noise and Vibration Management Plan

7. The Environment & Resource Authority conducted a consultation process with statutory consultees as required by the IPPC regulations. The comments from the consultees and the required feedback from EGM are documented in Annex 19. These included requests for information, where requested documents are included as either annexes to this main document, or attachments to this annex.

## **Annex 1: Application forms A & C**

## Annex 2: List and description of variations

- The following tables consists of a list of variations associated with the different associated activities, as per table 1.1.1 of IP0002/07Gi.

Associated Activity	Description of specified activity	Limits of specified activity	Proposed Variations
Associated activity of fuel handling and storage	Handling and storage of Liquefied Natural Gas	From receipt of fuel to storage within the Floating Storage Unit to delivery to the Regasification Plant.	<ul style="list-style-type: none"> <li>• Offshore LNG Bunkering Facilities</li> <li>• Use of an Inert Gas Generator on Board the FSU</li> </ul>
	handling of Natural Gas	From the regasification of liquid natural gas at the regasification plant to combustion in own plant or delivery to D3PG through the Gas receiving station.	n/a
	Handling and storage of gasoil	From receipt of fuel and storage in dedicated tanks to combustion in specified plant	<ul style="list-style-type: none"> <li>• use of gasoil instead of marine diesel</li> </ul>
Associated activity of regasification and gas pressure reduction	Operation of a Regasification Compound; including IFV technology, gas compressors, Nitrogen generating plant and non-visible combustion chamber (NVCC) and a gas receiving station	From receipt of liquefied natural gas from the floating storage unit to delivery to D3PG (DPS6) and DPS 7 through the gas receiving station	<ul style="list-style-type: none"> <li>• glycol expansion tank upgrade</li> <li>• improved power supply feeder</li> <li>• addition of FSU boil off gas attemperator</li> <li>• improved bunding of make-up water glycol tank</li> <li>•</li> </ul>
Associated activity of demineralised water polishing	Polishing of demineralised water	From receipt of demineralised water from Enemalta plc to delivery of utility	n/a



Associated Activity	Description of specified activity	Limits of specified activity	Proposed Variations
Associated activity of storage, treatment and disposal/recycling of waste materials	Handling, storage, treatment and disposal/recovery of wastes from installation.	From generation of waste to disposal or recycling onsite or offsite.	<ul style="list-style-type: none"> <li>• introduction of oil water separator at regasification site</li> <li>• oil boom</li> <li>• Portacabin offices sewage collection</li> </ul>
Associated activity of maintenance	Maintenance carried out in any workshop in the installation.	From maintenance activity to appropriate recovery/ disposal of any wastes created.	<ul style="list-style-type: none"> <li>• installation of chemical stores used in plant operation/maintenance (at both generation and regasification sites)</li> </ul>
Upgrades			<ul style="list-style-type: none"> <li>• Installation of office facilities</li> <li>• installation of A/C units and updating of F gas register</li> <li>• upgrade to reflect changes in fire suppression systems in line with regulations</li> <li>• Firefighting system in Gas Turbine control rooms</li> </ul>

## **Annex 3: Plans**

## Annex 4: Explanatory Notes

Section	Relevant Information
<p><b>C1.4</b></p> <p>Are you proposing any change in operation that would result in additional land being included within the site of the installation? If yes, please provide:</p> <p>A site report, describing the condition of the site of that part of the installation in respect of which you are applying for a variation, and, in particular, identifying any substance in, on or under the land which may constitute a pollution risk. A baseline report assessing the state of the groundwater and land may also be required by the Authority.</p>	<p>The only change that is being included is that the cooling water mixing chamber, previously used also for the D1 plant (now decommissioned), should now be noted as being for the sole use of D4. No change in the pollution risk is being envisaged, given that there are no further interventions on site.</p>
<p><b>C2.1 Environmental Management System</b></p> <p>Provide details of any changes to environmental management techniques resulting from your proposals.</p>	<p>Environmental Management Systems are certified to ISO 14001:2015. This EMS includes:</p> <ul style="list-style-type: none"> <li>• The company environmental policy</li> <li>• Management structure and organigram</li> <li>• Environmental objectives and targets</li> <li>• Training</li> <li>• Internal audit, review and corrective action processes</li> <li>• Procedures for operations in normal and abnormal conditions</li> <li>• Maintenance procedures</li> </ul> <p>The changes to the EMS required by the proposed variations do not introduce any significant changes in terms of the overall structure of the EMS. Upgrades to EMS documentation occur continuously given that these are dynamic documents; further changes will reflect the changes required in terms of updated maintenance requirements, emergency preparedness and operational control.</p>
<p><b>C2.2.1</b> Describe any proposed changes to the installation activities.</p>	<p>Proposed changes are those which are described in Annex 2. Installation activities will remain identical, with the exception of the introduction of Offshore LNG Bunkering</p>

Section	Relevant Information
<p><b>C2.2.2</b> Describe the proposed techniques and measures to prevent and reduce waste and emissions of substances and heat (including during periods of start-up or shut-down, momentary stoppage, leak or malfunction).</p>	<p>Techniques used to prevent and reduce waste and emissions of substances and heat are given in: Annex 5 – Best Available Technique for Large Combustion Plant.</p> <p>Issues related to safety emanating from the Control of Major Accident Hazards Regulations L.N. 179/2015 [S.L. 424.19] are being updated through submission of updated studies to the OHSA as COMAH lead competent authority.</p>
<p><b>C2.2.5</b> Include an outline of the main alternatives considered to the proposed technology, techniques and measures.</p>	<p>The variations considered are upgrades to existing plant, some of which are in response to COMAH audit findings and/or recommendations.</p>
<p><b>C2.3 Raw materials:</b> Identify any changes to the raw and auxiliary materials, and any other substances (including fuels) proposed to be used as a result of your proposals. If any changes are proposed, give details of quantities proposed to be used annually and submit respective MSDS sheets. In addition, identify the storage location of these materials on a site layout plan and give details on:</p> <ul style="list-style-type: none"> <li>• Maximum storage capacity;</li> <li>• Containment measures (including bunding capacity, where applicable);</li> <li>• Protective measures (including security).</li> </ul>	<p>Chemical usage will not change in response to any of the variations proposed. Chemical management on site is being improved through the adoption of the Chemdoc cloud-based software tool. This facilitates inventory tracking and management of safety data sheets.</p> <p>Locations of chemical storage are given in Annex 8; these consist of specialised container systems equipped with integrated bunding, with spill response kits being available in the vicinity.</p> <p>Quantities of chemicals stored on site are very limited, and those stored in quantities exceeding one tonne are as per the original application.</p>
<p><b>C2.5 Maintenance:</b> Describe any changes to the maintenance programme for the installation.</p>	<p>Maintenance systems are underpinned by dedicated IT systems which defines maintenance routines, based upon an evaluation of plant components and scheduling of recommended preventative maintenance (as per manufacturer's specifications). Maintenance schedules are updated based upon:</p> <ol style="list-style-type: none"> <li>1. findings of regular inspection routines detailing any corrective actions required; and</li> <li>2. evaluation of any changes in plant or operations, following a management of change process.</li> </ol> <p>The variations will result in introduction of new maintenance routines for new plant as a result of the introduced changes. These have been (or will be) introduced via Management of Change processes, as an integral part of project implementation, where the maintenance requirements of individual components are registered in the maintenance database, and maintenance timeframes established.</p>

Section	Relevant Information
<b>C2.7 Water</b> Provide a breakdown of any changes to the proposed annual water consumption by source and end-use.	No significant change to water consumption is envisaged.
<b>C2.8 Risk assessment</b>  Describe any changes to the documented system used to identify, assess and minimise the environmental risks and hazards of accidents and their consequences. Include any changes to emergency plans in case of fire, actions to be taken in case of failure of abatement equipment and other environmentally relevant incidents (e.g. spillages, gas leakage).	<p>Assessment of environmental risks and hazards is managed through the Environmental Management System, certified to ISO 14001 standards. This system is considered suitable to manage the requirements of these variation.</p> <p>The variation requesting LNG bunkering has been subject to HAZID and HAZOP studies to identify possible hazards, and consider requirements in terms of operability. The results of these studies are being incorporated into updated safety studies as required by the Control of Major Accident Hazards Regulations L.N. 179/2015 [S.L. 424.19] which are being submitted to the OHSA as COMAH lead competent authority.</p> <p>The other variations requested consist of either:</p> <ul style="list-style-type: none"> <li>• upgrades to improve containment (e.g. bunding, connections to sewage networks)</li> <li>• upgrades to improve firefighting and oil spill response; or</li> <li>• upgrades to operations.</li> </ul> <p>Given that all operation areas have hardstanding and features to promote containment of spills, no additional environmental risk is envisaged.</p>
<b>C2.9 Training</b> Please indicate whether any changes to the staff training programme will be required. Please submit the name of the technically competent person on site who will be responsible for such training.	The ISO 14001 certified system requires regular competence reviews and updates. A training programme is updated on an annual basis, and any requirements emanating from the variations will be captured by the training programme.

Section	Relevant Information
<p><b>C2.10 Cessation:</b> Describe any changes to the outline decommissioning plan describing the draft proposed measures upon definitive cessation of activities, to avoid any pollution risk and return the site of the installation to a satisfactory state (including relevant measures for the design and construction of the installation).</p> <p>This plan shall include a draft waste management strategy, and a qualitative assessment of the potential for contamination of land and groundwater pollution which might arise from the historical and current processes carried out at the installation.</p>	<p>The outline decommissioning plan submitted already covers the measures required during the decommissioning process, to avoid any pollution risk and return the site of the installation to a satisfactory state. The variations required will need to be considered at the full decommissioning plan stage, where specific method statements will be needed for the decommissioning and removal of specific plant components, within the framework established by the Outline Decommissioning Plan.</p>
<p><b>C2.11 Multi-operator installations</b> Where you are not the only operator of the installation, describe any change to the techniques and measures (including those to be undertaken jointly by yourself and other operators) for ensuring satisfactory operation of the whole installation resulting from your proposals.</p>	<p>The effects on the entire installation are defined through the safety studies which detail the measures required to be undertaken by the entire installation. (See also response to section C2.8).</p>
<p><b>C3.2 Emissions to Groundwater</b> Could there be changes to groundwater discharges from the installation?</p>	<p>The variations do not have an effect on areas not protected by existing hardstanding.</p>
<p><b>C3.4 Emissions to the Sea</b> Identify if the proposal may result in changes to direct discharges to coastal (up to 1 nautical mile from the coast line) or territorial waters. If any changes are identified, explain how the requirements of the Discharge of Dangerous Substances Regulations (LN 213 of 2001) and the Water Policy Framework Regulations (LN 194 of 2004 as amended by LN 24 of 2011) have been addressed. Include details of the source, any treatment proposed prior to discharge, composition and maximum volumes (in m3/day) discharged.</p>	<p>The Inert Gas Generator (IGG) is used on board the FSU to provide an inert atmosphere within the LNG tanks, to allow their inspection and recertification. This system has been noted during the initial application; however, the use of this system required further assessment prior to use. The ERA had given consent for limited use of the IGG to allow maintenance and testing of the system prior to the full recertification process. The initial tests highlighted limited emissions where further monitoring was deemed necessary to understand the scale of the discharges involved. ERA has given approval for a monitoring programme for these emissions, while tank recertification is under way. A monitoring plan is being submitted as part of this application.</p>

Section	Relevant Information
<b>C3.6 Emissions to Air</b> Identify if there may be any changes in emissions of substances to air.	Changes in emissions to air relate to S.L. 549.122 <i>Limitation of Emissions of Certain Pollutants into the air from Medium Combustion Plants Regulations</i> . Registration documentation related to Medium Combustion Plant on site are included in Annex 15. It is expected that the changes will result in alignment of emission limits within the permit to those stipulated in legislation.
<b>C3.7 Odour emissions</b> Identify if there may be changes in emissions of odour.	Operations on site do not involve generation of odours.
<b>C3.8 Emissions to Land</b> Identify if there may be any changes in emissions of substances to land.	The variations do not have an effect on areas not protected by existing hardstanding.
<b>C3.9 Noise</b> Describe: C3.9.1: The main sources of noise and vibration (including infrequent sources) of the new proposal; C3.9.2: The proposed techniques and measures for control of noise; C3.9.3: The nearest noise sensitive locations and distance away from the site (a site map may be submitted for this purpose); and C3.9.4: Relevant environmental noise measurement surveys which have been undertaken (monitoring shall be according to the latest revisions of ISO1996 and the rating of industrial noise affecting residential areas shall be according to BS 4142; monitoring shall be carried out exclusively using type 1 sound level meter).	The variations proposed do not include any significant noise sources. The existing noise monitoring programme has not highlighted any existing issues, and is expected to be suitable for the monitoring of these variations. A noise management plan is being submitted as part of this application.

Section	Relevant Information
<p><b>C3.11 Emissions &amp; waste summary</b>  <b>By means of a mass flow diagram, summarise the emissions and waste described in sections C3.1, C3.2, C3.3, C3.4, C3.6, and C3.8 of this application.</b></p>	<p>An updated process flow diagram is presented in Annex 11. No change in the mass flows related to emissions to air are expected, though this is expected to vary according to demand for power generation.</p> <p>Emissions from MCPs is generally minimal, given that these are used for testing purposes, and in case of emergency. The only variation will be the use of the IGG for less than 100 hours a year, for certification of the LNG tanks.</p> <p>Discharges to sea are expected to vary only by the emissions generated through the use of the IGG, which are of limited duration.</p> <p>Changes in terms of waste management mass flows are expected to be of the same order of magnitude as currently generated through operational and maintenance processes. waste parts generated through turbine overhauls will be returned to the manufacturer.</p>
<p><b>C4.2 Effects on other sites</b>  Provide an assessment of whether the proposal is likely to have a significant effect on another site in Malta and, if it is, provide an assessment of the implications of the installation for that site.</p>	<p>Review of the variations proposed resulted in the determination of the extent of changes to emissions and discharges caused by the variations (see response to C3.11 above). Furthermore, none of the monitoring results provided to ERA as part of the annual environmental report has been flagged up as being a significant negative impact.</p> <p>Given that the scale of the changes is extremely limited, no significant effect on another site in Malta is predicted.</p>



## **Annex 5: LCP BAT conclusions**

## **Annex 6: Certificate of Incorporation**

## **Annex 7: Improvement programme items as per table 1.5.1 of IP 0002/07Gi**

## **Annex 8: Raw Materials**

Kindly note that given the volume of documentation, only digital versions are being provided.

## **Annex 9: changes in equipment using ODS or F-gases**

## **Annex 10: updated Energy Efficiency Plan**

## Annex 11: Process Flow Diagram

## Annex 12: Waste Management

1. A complete description of the variations is included as Annex 2. Apart from the new ship-to-ship transfers, these variations consist of either upgrades to existing processes, or upgrades to LNG handling facilities to address points noted in COMAH audit processes. These may be summarised as:

- Ship-to-Ship transfer - LNG offloading;
- Glycol expansion tank upgrade;
- Improved Power Supply Feeder;
- Addition of FSU Boil-Off Gas Attenuator;
- Improved bunding of make-up water glycol tank;
- introduction of oily water separator at regasification site;
- additional of an oil boom to improve emergency response in case of oil spill;
- introduction of a fixed sewage connection to the portacabin office facilities;
- Installation of Chemical Stores used in plant operation/maintenance (at both generation and regasification sites)
- installation of office facilities as approved by PA/04297/18;
- updates with respect to use of fluorinated gases on site;
- Upgrade to reflect changes in fire suppression systems in line with regulations;
- replacement of a cooling water pump;
- Removal of AST and QAL 2 testing requirement for GT bypass stacks;
- the use of an Inert Gas Generator on board the FSU; and
- changes in the status of the cooling water mixing chamber.

2. Review of the processes highlighted above indicate that:

- the introduction of oily water separator at the regasification site will generate EWC 16 01 14\* (or the mirror code EWC 16 01 15, depending on the degree of oil contamination noted in this waste);
- upgrades to the fire-fighting suppression systems may generate some waste in terms of the active F-gases;
- none of the changes will affect the nature and quantity of wastes generated on board the FSU; and
- other wastes generated will be minor increments in terms of the wastes currently generated by existing administrative and maintenance processes.



3. **Waste storage:** no further capacity is envisaged, as storage capacity is deemed adequate for the limited wastes to be generated. Existing containment measures in terms of bunding, protection from the elements, and any security requirements, are considered sufficient.
4. **Preparation for recovery or recycling:** existing waste management procedures require the proper characterisation and segregation of wastes to allow wastes to be recovered and recycled as far as possible. The potential for recovery of wastes is investigated wherever possible. As highlighted above, used parts are shipped back to the manufacturer wherever possible, and recovery of chemical wastes investigated to determine whether such recovery is feasible.
5. **Disposal/recovery operations:** all waste carrier vehicles are registered as required by the Waste Management Activity (Registration) Regulations (S.L. 549.45). All wastes will be sent to facilities licensed to accept such wastes, either locally or outside Malta. All shipments of waste outside Malta shall abide by the requirements of the Waste Management (Shipments of Waste) Regulations (S.L. 549.65).

## **Annex 13: Connection to Sewer**

## **Annex 14: Expenditure Plan**

## **Annex 15: Emissions to Air (MCP Registrations)**

## Annex 16: Monitoring

1. A complete description of the variations is included as Annex 2. Apart from the new ship-to-ship transfers, these variations consist of either upgrades to existing processes, or upgrades to LNG handling facilities to address points noted in COMAH audit processes. These may be summarised as:
  - Ship-to-Ship transfer - LNG offloading;
  - Glycol expansion tank upgrade;
  - Improved Power Supply Feeder;
  - Addition of FSU Boil-Off Gas Attenuator;
  - Improved bunding of make-up water glycol tank;
  - introduction of oily water separator at regasification site;
  - additional of an oil boom to improve emergency response in case of oil spill;
  - introduction of a fixed sewage connection to the portacabin office facilities;
  - Installation of Chemical Stores used in plant operation/maintenance (at both generation and regasification sites)
  - installation of office facilities as approved by PA/04297/18;
  - updates with respect to use of fluorinated gases on site;
  - Upgrade to reflect changes in fire suppression systems in line with regulations;
  - replacement of a cooling water pump;
  - Removal of AST and QAL 2 testing requirement for GT bypass stacks;
  - the use of an Inert Gas Generator on board the FSU; and
  - changes in the status of the cooling water mixing chamber.
2. Review of the processes highlighted above indicate that:
  - all emissions to air from combustion plant are currently the subject of existing monitoring provisions as per IPPC permit;
  - all discharges to seas are currently the subject of existing monitoring provisions as per IPPC permit, with the exception of the IGG monitoring which is the subject of a monitoring proposal approved by ERA;
  - no further monitoring of ground pollution or noise is deemed necessary, given that current provisions in the IPPC permit adequately capture any emissions from the site.
3. Ship-to-ship transfer operations will require reconsideration of current monitoring requirements, as part of the GHG emissions auditing.

## **Annex 17: Certifications**

Kindly note that given the volume of documentation, only digital versions are being provided.

## **Annex 18 - Permits**

## **Annex 19 – Regulatory Consultation**



## **Annex 20 – OTNOC Plan**

## **Annex 21 – Performance Test**

## **Annex 22 – Noise and Vibration Management Plan**