

**Annex I: Comments regarding the IPPC application – EGM (IP0002/2021i)**

**Form A**

Section	Duly made?	ERA Comments 18 June 2021	EGM comments and replies 9 <sup>th</sup> July 2021	Duly made	ERA comments
N/A	✖	Kindly note that for a variation of the IPPC permit, Form A that needs to be filed is not the version that there is currently on ERIS. Whilst we acknowledge that currently the Form A (Variation) in the servizz.gov website leads one to ERIS, this is not correct. Please find attached Form A attached which needs to filled in for your perusal.	Kindly refer to Annex O – Form A	✓	Noted.

**Form C**

Section	Duly made ?	ERA Comments 18 June 2021	EGM comments	Duly made	ERA comments	EGM comments (9 <sup>th</sup> Dec 2021)
C1.1	✓	<u>Document: Annex 2</u>		✓		

Table 1.1.1			Request updates	ERA comments			
Activity listed in Schedule 1 of the Industrial Emissions (IPPC) Regulations / Associated Activity	Description of specified activity	Limits of specified activity					
Section 1.1: Combustion installations with a rated thermal input exceeding 50 MW	Generation of electrical energy through the combustion of Natural Gas  Installation consists of three Combined cycle gas turbines (DPS7),	From receipt of fuel to delivery of utility.					
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.	a) Onshore and offshore LNG Bunkering Facilities b) Use of an Inert Gas Generator on Board the FSU	a) Noted, following the meeting held in June 2021. We confirm that the variation onshore bunkering will not offshore take place. Kindly of LNG. All references to onshore that bunkering discussion will be with removed. COMAH are ongoing. b) Noted, ERA will update permit under the specified activities of Associated activity of other combustion plant		a) Noted, kindly ensure the amendment is affected in the consolidated application.	Noted
	handling of Natural Gas	From the regasification of liquid natural gas at the regasification plant to	n/a			b) Noted.	

				combustion in own plant or delivery to D3PG through the Gas receiving station.						
			Handling and storage of gasoil	From receipt of fuel and storage in dedicated tanks to combustion in specified plant	c) Use of gasoil instead of marine diesel	Noted				
		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	d) glycol expansion tank upgrade e) improved power supply feeder f) addition of FSU boil off gasa temperator g) improved bunding of make-upwater glycol tank improved pressure control forLNG send out pumps through Kongsberg upgrade to K-chief system	noted				
		Associated activity of other combustion plant	Operation of: <ul style="list-style-type: none"> <li>• 2 X FSU main Boilers (58.5MWth each operating at 4.3MWth)</li> <li>• 2xFSU Aux. boilers (16.25MWth each)</li> <li>• FSU emergency Diesel gen-set 1 (3.6MWth)</li> <li>• FSU emergency Diesel gen-set 2 (0.45MWth)</li> <li>• FSU auxiliary diesel gen set (5 MWth)</li> <li>• 2 X gas heating boilers at the gas receiving station (0.42MWth each)</li> </ul>	From receipt of natural gas or gasoil to combustion in the specified plant.						

			<ul style="list-style-type: none"> <li>CCGT emergency diesel gen-set (2.6 MWth)</li> <li>Re-gas emergency diesel gen-set (0.54 MWth)</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 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.	h) introduction of oil water separator at regasification site i) oil boom j) Portacabin offices sewage collection	Not					
		Associated activity of maintenance	Maintenance carried out in any workshop in the installation.	From maintenance activity to appropriate recovery/ disposal of any wastes created.	k) installation of chemical stores used in plant operation/maintenance (at both generation and regasification sites)	Not					
					l) Installation of office facilities m) installation of A/C units and updating of F gas register n) upgrade to reflect changes in fire suppression systems in line with regulations o) Firefighting system in GasTurbine control rooms						
C1.2	✓	<b><u>Document: Introduction &amp; Non-technical Summary</u></b>									
		Noted									

C1.3	x	<p><b><u>Document: Annex 2</u></b></p> <p>A. Upgrade of Siemens GT's</p> <p>i. On the following statement " GM is considering performing an upgrade of the Delimara 4 gas turbines from the current 50.5MW version to the 54MW one." It is understood that EGM is contemplating upgrading all 3 CCGT (DPS7) to 54MW. Kindly confirm</p> <p>ii. With respect to the NOx, CO, NOx and CH<sub>4</sub> emissions, or change in water consumption is envisaged, where there are preliminary studies or calculation carried out to support this statement. Especially in view that in annex 10 there might be a slight increase in NOx emissions</p> <p>B. Ship-to-Ship transfer - LNG offloading</p> <p>Noted, kindly submit safety studies as part of the application in the meeting in June 2021 it was indicated that such submissions is to be provided by end June. Kindly note that discussions with COMAH are ongoing.</p> <p>C. Glycol expansion tank upgrade</p> <p>i. Kindly confirm whether the existing bund (Regasification area) is sufficient to cater from the additional new glycol expansion tank.</p> <p>ii. Kindly confirm volumetric capacity of additional tank</p> <p>D. Improved Power Supply Feeder</p> <p>Noted</p> <p>E. Addition of FSU Boil-off gas attemperator</p> <p>Applicant to clarify whether the proposed change will have a bearing on the tie-in points defined in the permit.</p> <p>F. Improved bunding of make-up water glycol tank</p> <p>Noted, with respect to bunding what is the total bund capacity of the Regasification area</p> <p>G. Improved pressure control for LNG send out pumps through Kongsberg upgrade to K-chief system</p> <p>Noted it is understood that such a change has no environmental impact and has effectively no bearing on the permit. Kindly confirm.</p> <p>H. Introduction of Oily Water Separator at Regasification Site</p> <p>Kindly confirm whether the oil-water separator conforms to EN-858. With respect to monitoring of such waste water how frequently is such water tested and what is the basis for deciding it should be discharge through point 6. Kindly provide specification sheet of oil water interceptor.</p>	<p>All 3 CCGT will be upgraded in C inspection as per Siemens maintenance programme in the year 2023/2024.</p> <p>Kindly refer to Annex 1 - EIA statement.</p> <p>Kindly refer to updated safety studies that will be provided in August.</p> <p>i. The glycol expansion tank was retained from the commissioning process as it was useful as a buffer store. The bunding is sufficient to</p>		<p>Point A: The application is to be revised in view of the September 2021 notification sent to the Authority.</p> <p>Point B: Noted, such issues will be handled by COMAH.</p> <p>Point C: Noted</p> <p>Point E: Noted</p> <p>Point F: Noted</p> <p>Point G: retraction of 'Improved pressure control for LNG send out pumps through Kongsberg upgrade to K-chief system' is noted, kindly ensure that the consolidated application caters for this amendments</p> <p>Point H: from the certification provided it is understood that the separator is not certified to conform to the EN 858 standard, kindly confirm.</p>	<p>Point A: Noted</p> <p>Point B: Noted</p> <p>Point G: Noted</p> <p>Point H: The Oily water separator at the regasification site, is tested and certified by the Deutsche Institut für Bautechnik, which is a German industry certification</p>

		<p>I. Oil boom</p> <p>Noted.</p> <p>J. D4 Porta cabin offices sewage collection</p> <p>Noted, with respect to the above ground sewage tank has this been removed. Kindly indicate whether any changes are necessary to plans previously provided to ERA (ENEM-URS-FS-00-DR-ME-00056 &amp; MT1001-UZ-CLD103-445172836_E)</p> <p>K. Installation of Chemical Stores used in plant operation/maintenance (at both generation and regasification sites)</p> <p>Noted.</p> <p>L. Installation of office facilities</p> <p>Noted, it is understood that an installation is already in place.</p> <p>M. Installation of A/C units and updating of F gas register</p> <p>Kindly provide document EGM-HSE-EMR-06 and see comments below.</p> <p>N. Upgrade to reflect changes in fire suppression systems in line with regulations</p> <p>Noted it is understood that future plans for the installation of fire suppressing equipment will not involve any ODS or F-gases. Kindly provide a status update in terms of such a proposal in terms of whether it has been implemented or not</p> <p>O. New cooling water pump [ to discuss in general in view that inlet water point is not defined in permit, along with many other spec]</p> <p>Noted it is understood that such a change has no environmental impact and has effectively no bearing on the permit. Kindly confirm.</p> <p>P. Removal of AST and QAL 2 testing requirement for GT bypass stacks</p> <p>Kindly note that ERA will provide a position on this in due course.</p> <p>Q. Cooling water mixing chamber</p> <p>Kindly indicate what is the function of the cooling water-mixing chamber. Kindly indicate whether there is any changes to the relative tie-in point of a site plan.</p>	<p>cater for the volume .</p> <p>ii. The additional tank has a volume of 10m3.</p> <p>This variation will not affect the tie-in points.</p> <p>Kindly refer to Annex 2 - Reganosa bund inventory.</p> <p>Confirmed. This variation is being withdrawn from this application.</p> <p>The oil-water separator at Regas meets the requirements for technical approval by the German Institute of Construction Engineering. Kindly refer to Annex 3 - Reganosa oil-water separator.</p> <p>The environmental risk posed by the effluent is the hydrocarbon</p>		<p>Point J: Updated plans are noted.</p> <p>Point M : Noted</p> <p>Point N: Noted</p> <p>Point O: Noted</p> <p>Point P: this has been tackled through a separate communication in August 2021, and the issue is now considered as resolved.</p> <p>Point Q: Noted [ To check on removal of tie-in point in permit].</p>	<p>covering such use. Kindly note that the effluent from the Regas oily water separator is passed through the D4 oil water interceptor, which was already approved by ERA.</p> <p>Point P: Noted</p>
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		<p>R. Inert Gas Generator</p> <p>This is noted, kindly see comments on section of air.</p> <p>Kindly provide envisioned time-line for implementation/commissioning of the proposed variations A till R.</p>	<p>content, the bulk of which is removed by this interceptor. Further treatment is provided at the discharge point (Point 1 - D4 approved interceptor), which has continuous monitoring of hydrocarbons.</p> <p>Above ground sewage tank in the D4 area has been removed. Kindly refer to Annex 4 - Updated plans</p> <p>Kindly refer to Annex 8 - F gases.</p> <p>This variation has been completed in June 2021. IG-55 Argonite was used which is composed of argon and nitrogen.</p>			
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			<p>Confirmed. Kindly note that this is an upgrade of existing infrastructure and no environmental impact is consequently envisaged.</p> <p>Noted.</p> <p>Originally, the function of the cooling water mixing chamber was to receive outgoing sea water streams from D1, before being released to the sea through the outfall (Point 4). Following the decommissioning of D1, there is no mixing being carried out at the former cooling water mixing chamber. There was no changes affected by EGM on this regard. Since D1 was rarely operated, no change in water temperature is expected.</p> <p>Noted.</p> <p>Variation A is targetted for 2023/2024, variation B is targetting for 2022, whilst variation E would be implemented in 2021. Should</p>			
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			variation P be accepted by ERA, QAL2 will be carried out in January 2022. The rest of the variations have already been implemented.			
C1.4	✓	<b>Document: Annex 3: Plans</b>  Noted it is understood that the proposed change effectively makes tie in point 18 redundant. Kindly confirm and if so kindly provide an update the specified tie-in point layout if relevant (47067567-1019_12 and ENEM-URS-E0-00-DR-ME-00106_P5)	Kindly refer to Annex 4 - Updated plans	✓	Noted	
C1.4.1	✓	<b>Document: Annex 4 - Explanatory Notes</b>  Noted				
C1.4.2	✓	<b>Document: Annex 3: Plans</b> <ul style="list-style-type: none"> <li>• see point C1.4</li> <li>• Kindly provide an updated air emissions plan for inclusion in the permit (ENEM-URS-FS-00-DR-ME-00056).</li> </ul>	Kindly refer to Annex 4 - Updated plans	✓	Noted	
C1.4.3	✓	<b>Document: Annex 4 - Explanatory Notes</b>  Same as above	Noted.	✓	Noted	
C2.1	✗	<b>Document: Annex 4 - Explanatory Notes &amp; Annex 2</b>  <b>Document: certificates</b>  The certification listed in Annex 17 certification is noted, however kindly provide updated certification in view that the validity indicated in certificate is until 28 February 2021. Kindly note replies in BAT conclusions, in with respect to emergency preparedness and response which is an identified requirement in terms of the BAT conclusion it is understood that the proposed changes listed in annex 2 will require certain update. Kindly provide an updated emergency preparedness and response plan.  In tandem kindly provide: <ol style="list-style-type: none"> <li>1) A monitoring programme including any update pertaining to the changes to air emissions in view of the SL. 549.122, any updated required by BAT, and point P listed in annex 2.</li> <li>2) Kindly see Annex II BAT replies</li> </ol>	Kindly refer to Annex 5 - Certification EGM's ISO 14001 certificate. Kindly refer to EGM replies for BAT conclusion document.  The updated ERP will be provided in August 2021 to reflect the updates in CERP which is currently at its final stages of review.  1) Kindly refer to Annex	✓	Noted on the CERP, such issues will be addressed by COMAH.	Noted.

			13 - Monitoring plan.  2) Kindly refer to EGM replies to Annex II BAT			
C2.2.1	✓	<p><b><u>Document: Annex 4 - Explanatory Notes</u></b></p> <p>Noted however applicant to note that the following will also need to be updated</p> <ul style="list-style-type: none"> <li>Section 1.1: Combustion installations with a rated thermal input exceeding 50 MW</li> <li>Associated activity of other combustion plant in view of inclusion of IGG, and amendments to the rated thermal input</li> </ul> <p>And in line with proposal above</p>	Kindly refer to Annex 6 - Updated explanatory notes.	✓	Noted	
C2.2.2	✗	<p><b><u>Document: Annex 4 - Explanatory Notes &amp; Annex 5</u></b></p> <ul style="list-style-type: none"> <li>i. Kindly note replies in BAT conclusion.</li> <li>ii. With respect to proposed onshore bunkering, operations kindly provide a reply of what measures are being taken to reduce emissions during offshore operations. Kindly clarify what is the envisioned frequency of such bunkering operations.</li> <li>iii. Kindly provide the updated safety reports as request by COMAH / summary of the changes requested by COMAH.</li> </ul>	<p>Kindly see EGM replies to Annex II BAT.</p> <p>The variation concerns only offshore bunkering of LNG. All references to onshore bunkering will be removed.</p> <p>The updated safety studies will be finalised and provided in August 2021. The updated ERP will be provided in August 2021 to reflect the updates in CERP which is currently at its final stages of review.</p>		Noted, such issues will be addressed by COMAH.	Noted.
C2.2.3	✗	<p><b><u>Document: Annex 11</u></b></p> <p>Kindly include in the process flow diagram the following</p> <ul style="list-style-type: none"> <li>D7A CCGT 1 (main stack)</li> <li>D7B CCGT 1 (By-pass stack)</li> <li>D7C CCGT 2 (main stack)</li> </ul>	Kindly refer to Annex 4 - Updated plans		Noted	

		<ul style="list-style-type: none"> <li>• D7D CCGT 2 (By-pass stack)</li> <li>• D7E CCGT 3 (main stack)</li> <li>• D7F CCGT 3 (By-pass stack)</li> <li>• D7G Gas receiving station gas boiler 1</li> <li>• D7H Gas receiving station gas boiler 2</li> <li>• D7I FSU Main Boiler 1, FSU Main Boiler 2, FSU Aux Boiler 1, FSU Aux Boiler 2</li> <li>• D7J FSU emergency Gen Set 1</li> <li>• D7K FSU emergency Gen Set 2, FSU auxiliary diesel Gen Set</li> <li>• D7L CCGT emergency Gen Set</li> <li>• D7M Re-gas emergency Gen Set</li> <li>• D7N NVCC</li> <li>• D7O (IGG)</li> <li>• Point 1</li> <li>• Point 4</li> <li>• Point 6</li> <li>• Point 7</li> <li>• TP 21 D4</li> <li>• TP 18 D4</li> <li>• Point 8 ( IGG discharge)</li> </ul>				
C2.2.4	✓	<p><b><u>Document: Annex 4 - Explanatory Notes</u></b></p> <p>Kindly note there is no section 2.2.4 in Annex 4, Operator to confirm whether any update are necessary from the BAT reference documents Emission from storage and Industrial Cooling BAT conclusions.</p> <p><b><u>Annex 5:</u></b></p> <p>Kindly note replies in Annex III</p>	<p>No further reference to Annex 4 is required as no updates are necessary to the BAT reference document on Emission from storage and Industrial Cooling BAT conclusions.</p> <p>Noted.</p>	✓	Noted	
C2.2.5	✓	<p><b><u>Document: Annex 4 - Explanatory Notes</u></b></p> <p>It is understood that no alternative assessment was made for the proposed variations listed in annex II.</p>	<p>An alternative assessment is not required. The variations being proposed are upgrades or variations for which no realistic alternative exists.</p>	✓	Noted	
C2.3	✗	<p><b><u>Document: Annex 8</u></b></p> <p>Kindly note with reference to the comment that locations of chemical storage are given in Annex 4, this is not correct, kindly revise and submit information.</p>		✓	Submissions Annex 7 – chemicals are noted.	

	<p>With reference to Annex 8, kindly note that the following information was included in application IP0002/07/F</p> <ol style="list-style-type: none"> <li>1. LNG</li> <li>2. Natural GAS (pipeline)</li> <li>3. Propane</li> <li>4. Long Life Engine Coolant Concentrate-C2053</li> <li>5. BP DMA Marine Distillate Low Sulphur</li> <li>6. METEOR T-10 High Expansion Foam Concentrate</li> <li>7. SODIUM PHOSPHATE, DIBASIC</li> <li>8. Nitrogen</li> <li>9. Chevron Synthetic Turbine Oil SGT</li> <li>10. CHLORINE TABLET</li> <li>11. Turbinol X-EP 32 F</li> <li>12. Ion exchange, resins and catalysts</li> <li>13. NALCO ELIMIN-OX®</li> <li>14. Ammonia Solution 25-35%</li> <li>15. Trisodium Phosphate</li> <li>16. TURBOTECT 950</li> <li>17. GASOIL, DIESEL AND HEATING</li> <li>18. HYDROCHLORIC ACID, SOLUTION min.</li> <li>19. Sodium hydroxide,</li> <li>20. Sigmaprime 700</li> <li>21. SIGMA ECOFLEET 290 S</li> <li>22. ECOFLEET 290</li> <li>23. MSDS ECOFLEET 290.pdf</li> <li>24. MSDS SC 555 BLACK BASE</li> <li>25. MSDS SC 555 HARDENER</li> <li>26. MSDS SD 550H BLACK BASE.PDF</li> <li>27. MSDS SD 550H HARDENER.PDF</li> <li>28. MSDS SP 700 GREY BASE.PDF</li> <li>29. MSDS SP 700 HARDENER.PDF</li> <li>30. MSDS SP 700 YG BASE.PDF</li> <li>31. Sigma EcoFleet 290S PDS.pdf</li> <li>32. SigmaCover 555 PDS.pdf</li> <li>33. SigmaDur 550H PDS.pdf</li> <li>34. SigmaPrime 700 PDS.pdf</li> <li>35. Resin type nm-60</li> <li>36. eliminox</li> <li>37. lub oil fsu</li> <li>38. lube oil regas</li> <li>39. diesel</li> <li>40. BOG</li> <li>41. 30% glycil demin coolant</li> </ol> <p>In view that the list provided in annex 8, includes additional material kind ensure annex 8 contains the following information:</p> <ol style="list-style-type: none"> <li>1. List the main raw materials used on site and methods of storage (drums, bulk tank, etc.). Also label on the site layout plan the location of storage areas as per the location codes. Kindly note location codes should be grouped in the event of storage within same location/bund, so as to ensure that the site plan provided is not cumbersome. Submissions of MSDS sheet is required for each material and/or chemical listed.</li> </ol>	<p>Reference should be made to Annex 8.</p>			
		<p>1. Kindly refer to Annex 7 -</p>			

		<p>2. Indicate if applicable whether the annual VOC solvent consumption is greater than the 50 tonne threshold above which the Industrial Emissions (Limitation of Emissions of Volatile Organic Compounds) Regulations, S.L.549.79, apply.</p> <p>List all such materials in the table. For each such material, all columns in the table are to be filled in as explained below:</p> <table border="1"> <thead> <tr> <th>Material Code</th><th>Name of Material/ Chemical</th><th>CAS Number/s</th><th>Maximum Storage Capacity on Site</th><th>Annual Consumption</th><th>Storage Arrangements</th><th>Containment and/or Measures</th></tr> </thead> <tbody> <tr><td>RM1</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>RM2</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>RM3</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>RM4</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>RM5</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>RM6</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>RM7</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>	Material Code	Name of Material/ Chemical	CAS Number/s	Maximum Storage Capacity on Site	Annual Consumption	Storage Arrangements	Containment and/or Measures	RM1							RM2							RM3							RM4							RM5							RM6							RM7							<p>Chemicals for a complete list of raw materials and MSDS sheets. Kindly refer to Annex 4 - Updated plans.</p> <p>2. The annual VOC solvent consumption is not greater than the 50 tonne threshold.</p>			
Material Code	Name of Material/ Chemical	CAS Number/s	Maximum Storage Capacity on Site	Annual Consumption	Storage Arrangements	Containment and/or Measures																																																								
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C2.4	✗	<p><b>Document: Annex 9</b></p> <p>i. Kindly indicate for each listed equipment whether such equipment is hermetically-sealed systems, fixed systems or mobile systems in annex 9.</p> <p>ii. Kindly amend EQ reference codes as a continuation from previously declared ODS equipment (EQ1-6)</p> <p>iii. Kindly provide an updated site plan including location codes EQ for each of the listed ODS equipment. The site plan should include also the EQ 1-6 which were declared in application IP0002/07/F.</p>	<p>Kindly refer to Annex 8 - F gas for updated register and Annex 4 - Site Plans showing all EQ units exceeding 3kg charge. All units were re-numbered to correct grouping in previous versions of f gas registers.</p>	✓	Noted																																																									
C2.5	✓	<p><b>Document: Annex 4</b></p> <p>Noted, as per BAT 1 a planned maintenance programme is to be maintained. Kindly provide an indication of the summary of maintenance plan, which will be in place in view of the variation requests listed in annex 2.</p>	<p>The only variation within the scope of LCP BAT 1 is variation A. 'Siemens GT upgrade'. Planned maintenance programme for GT</p>		Noted, however kindly update application.	Noted.																																																								

			turbine upgrade, provided in Annex 4 of the IPPC permit renewal application, will not change the existing maintenance provisions.			
C2.6.1	✗	<b><u>Document: Annex 10</u></b>  Kindly provide a breakdown of the proposed annual energy consumption, highlighting the main energy-consuming equipment, and generation by source and end-use (including information on energy generated on site, if applicable), in view of the proposed variations.	Kindly refer to Annex 9 - Energy consumption. EGM ensures that its procurement is as efficient as possible to minimise on-site consumption.	✓	Noted	
C2.6.2	✓	<b><u>Document: Annex 10</u></b>  <ul style="list-style-type: none"> <li>- With respect to listed measures FSU and LNG regasification which is stated to be implanted already under point 5 is stated that the LNG spray attemperator been installed already?</li> <li>- Kindly see replies Annex III</li> </ul>	As stated in Annex 10 of the permit renewal application, the LNG spray attemperator has not yet been installed.	✓	Noted	
C2.7	✓	<b><u>Document: Annex 4 - Explanatory Notes</u></b>  Noted.				
C2.8	✗	<b><u>Document: Annex 4</u></b>  Kindly provide timeframe by when safety studies, emergency response plan will be provided.	The updated safety studies will be finalised and provided in August 2021. The updated ERP will be provided in August 2021 to reflect the updates in CERP which is currently at its final stages of review.		Same comments as above	Noted.
C2.9	✓	<b><u>Document: Annex 4</u></b>  noted				
C2.10	✓	<b><u>Document: Annex 4</u></b>  Noted				

C2.11	✗	<p><b><u>Document: Annex 4</u></b></p> <p>Kindly provide timeframe by when safety studies, emergency response plan will be provided. Kindly see comment re C1.4 Kindly note that this matter is also being discussed with COMAH.</p>	<p>The updated safety studies will be finalised and provided in August 2021. The updated ERP will be provided in August 2021 to reflect the updates in CERP which is currently at its final stages of review.</p> <p>Noted.</p>		Same comments as above	Noted.
C3.1.1	✗	<p><b><u>Document: Annex 12</u></b></p> <p>Kindly note any updates are to be reflected in the updated waste management plan</p>	Kindly refer to Annex 10 - Waste Management Plan.	✓	Noted	
C3.1.2	✗	<p><b><u>Document: Annex 12</u></b></p> <p>Kindly note any updates are to be reflected in the updated waste management plan</p>	Kindly refer to Annex 10 - Waste Management Plan.	✓	Noted	
C3.1.3	✗	<p><b><u>Document: Annex 12</u></b></p> <p>Kindly note any updates are to be reflected in the updated waste management plan</p>	Kindly refer to Annex 10 - Waste Management Plan.	✓	Noted	
C3.2	✓	<p><b><u>Document: Annex 4</u></b></p> <p>Noted</p>				
C3.3.1	x	<p><b><u>Document: Annex 13</u></b></p> <p>Kindly update the discharge layout plan ENEM-URS-E0-00-DR-ME-00106_P5.</p>	Kindly refer to Annex 4 - Plans	✓	Noted	
C3.3.2	✓	<p><b><u>Document: Annex 13</u></b></p> <p>Sewer discharge permit is noted, however applicant to clarify whether proposed reconnection of sewer has already taken place, and is covered by attached sewer discharge permit.</p>	The sewage from the D4 portacabins has already been connected to the public sewer discharge point and the above ground sewage tank has already been removed. This has	✓	noted	

			been covered in the latest public sewer discharge permit application submitted to WSC.			
C3.3.3	✗	<b><u>Document: Annex 13</u></b>  Kindly note this is marked as yes, kindly elaborate which Schedule A or Schedule B substance are discharged into the sewers from the proposed changes. Explain how the requirements of LN 139 of 2002 have been addressed.	The reason for marking 'yes' is due to a discharge from the lab, which has been assessed by the WSC as part of the sewer discharge permitting process.	✓	Noted	
C3.3.4	N/A	Noted				
C3.4	✗	<b><u>Document: Annex 4</u></b>  Submissions are noted in terms of the IGG, will be included as part of the permit. Operator to note that requested information, pertaining to point C3.4, which was already submitted to the authority will need to feature as part of the consolidated application.	Kindly refer to Annex 13 - Monitoring plan	✓	Noted	
C3.5	N/A	Noted				
C3.6	✗	<b><u>Document: Annex 4 &amp; annex 15</u></b>  <ul style="list-style-type: none"> <li>- Kindly see comments on section related to the monitoring programme</li> <li>- 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.</li> <li>- Kindly update site plan as above.</li> <li>- Kindly see comment above on air emissions due to the transition from 50.5 to 54MW<sub>th</sub></li> <li>- Kindly note include full exhaustive MCP registration forms will need to be submitted as part of the consolidated application.</li> </ul>	Noted. Noted.  See above. Noted. Kindly refer to Annex 12 – Medium Combustion Plants	✓	Noted	
C3.7	✓	<b><u>Document: Annex 4</u></b>  Noted.				
C3.8	✓	<b><u>Document: Annex 4</u></b>  Noted				
C3.9	✗	<b><u>Document: Annex 4</u></b>  Kindly see comment in regulatory consultation	Noted.			
C3.10	✗	<b><u>Document: Annex 15</u></b>		✓	Noted	



		<ul style="list-style-type: none"> <li>- Kindly include note annex 15 refers to the MCP registration</li> <li>- Kindly provide an monitoring plan in view of proposed variation and including point 3 mentions on GHG emissions auditing.</li> </ul>	Kindly refer to Annex 13 - Monitoring plan.			
C3.11	✗	<p><b>Document: Annex 6</b></p> <p>Kindly provide mass flow diagrams with the requested information</p>	Following the GT upgrade, NOx is expected to increase by 2-3ppm. This may be balanced by an increase in the turbine efficiency. With regards to IGG, kindly refer to conclusions of the monitoring report provided in Annex 11 - IGG.	✓	Kindly revise accordingly.	<p>IGG is noted as Point 8 in the EGM-HSE-PLN-007 available in Attachment 5 – Process Flow Diagrams.</p> <p>Furthermore, the GT upgrade is not mentioned in EGM-HSE-PLN-006 available in Attachment 5 – Process Flow Diagrams.</p>
C4.1	✗	<p><b>Document: Introduction and Non-Technical Summary &amp; Annex 16</b></p> <p>Kindly indicate and to take note of the regulatory consultation feedback</p>	Noted.			
C4.2	✗	<p><b>Document: Introduction and Non-Technical Summary &amp; Annex 16</b></p> <p>Kindly indicate and to take note of the regulatory consultation feedback</p>	Noted.			
C5.1	N/A					
C6.1	✓	Noted				
C6.2	✓	Noted				
C6.3	✓	Noted				
C7.1	✓	<p><b>Document: Annex 18</b></p> <p><b>REWS/73/2017:</b> Noted  PSF/28 : Noted  WHL/IW/25 : Noted (expiry 31<sup>st</sup> December 2023)  MT3L Noted  IP0002/07/Gii- Noted  REWS/74/2017: Noted  REWS/75/2017:Noted  SSF/41L Noted (validity until 31/7/2021)  DMU 1211: Noted  PA 0497/18:noted  PA0022/14 :noted  PA0021/14: noted</p>	With regards to SSF/41L, a renewal application has been submitted to REWS in March 2021.	✓	Noted	

C8.1	✓	Noted.				
C8.2	✓	Noted.				
C9.1	✗	<p><b><u>Document: Annex 14</u></b></p> <p>An expenditure plan has not been provided</p>	Kindly refer to Annex 14 - Expenditure Plan	✓	Noted	