

## Annex I Renewal Application DPS IPPC Permit Subsidiary Permit 3 – Enemalta plc - IP 0002/07/Giii

### Requested changes to current IPPC permit

IPPC Ref.	Description of requested change/update to current IPPC permit		Comments	ERA Comments
<b>1.1</b>	<b>Permitted Activities</b>			
Table 1.1.1				
<b>Activity listed in Schedule 1 of IPPC Regulations/Associated Activity</b>	<b>Requested change to current IPPC permit specified activity</b>	<b>Requested change in Limits of Specified activity</b>	<b>Comments</b>	
Combustion installations with a rated thermal input exceeding 50MW	<p><del>Generation of electrical energy through the combustion of heavy fuel oil in emergency cases only</del></p> <p>Installation consists of <del>two boilers making up DPS 1 (phase 1A and 1B)</del>, two open cycle gas turbines (DPS2 and DPS3); and two combined cycle gas turbines (DPS4 and DPS5)</p>	From receipt of fuel to delivery of utility (No change)	Official communication sent to ERA dated 31 <sup>st</sup> August 2017 informing ERA of complete closure of Delimara 1 plant and official communication in connection with decommissioning and dismantling of DPS 1 (phase 1A and 1B) as per DPS IPPC partial surrender application dated March 2017	Agreed.
Associated activity of steam generation	<p>To include a new activity for steam generation by means of an auxiliary boiler.</p> <p>“Generation of steam by means of an auxiliary boiler”</p>	Generation of steam utilised for the heating of HFO tanks, production of evaporated water and warming up of the combined cycle steam turbine	<p>With the dismantling of the boilers which were part of DPS 1A and 1B the capability for steam generation was lost. An auxiliary boiler with a thermal rating of 4MW<sub>TH</sub> and operating on diesel/gasoil is being used for this purpose</p> <p>The boiler has a small diesel/gasoil tank having a volume of 4.325m<sup>3</sup> which is used as a buffer tank and has a small stack at the back.</p> <p>Dimensions are as follows: Auxiliary boiler: 6.5m x 2.4m</p>	<p>Operator to note the following is required;</p> <ul style="list-style-type: none"> <li>a) A submission of the application of variation form (attached)</li> <li>b) Submission of a medium combustion plant registration</li> </ul>

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			<p>Chimney Aux: 0.72m x 0.54m  Diesel/Gasoil Buffer tank: diameter 1.4m x 2.77m height  Location of auxiliary boiler is opposite area denoted as D1 on site plan</p> <p>Photos of auxiliary boiler, diesel/gasoil buffer tank and chimney are being forwarded in item (i) of the supplementary documents entitled "Auxiliary boiler_tank_chimney"</p>	<p>form (attached)</p> <p><a href="#">Enemalta reply</a>  Noted. Forms for IPPC application variation and for medium combustion plant registration are being submitted to ERA</p>
Table 1.1.1 Associated activity of fuel handling and storage	Handling and storage of heavy fuel oil (No change)	<p><del>From receipt of the fuel and storage in tank farm to combustion in DPS 1 in emergency cases only</del></p> <p>From receipt of the fuel to storage in tank farm and from tank farm to tanker/barge"</p>	<p><del>Delete</del> combustion of heavy fuel oil in steam turbines (Phase 1A and 1B). These have been dismantled. Combustion of heavy fuel oil is no longer being carried out at DPS.</p> <p>However, the Heavy fuel oil tanks are being used to store Heavy fuel oil for 3<sup>rd</sup> parties.</p> <p>To include a new activity for <del>bunkering</del> storage-of fuels.</p>	<p>Agreed.</p> <p>Noted the ERA will be discussing with COMAH. In terms of the permit, activity under table 1.1.1 will need to be amended to include transfer from tank farm to tanker/barge.</p> <p>Enemalta to indicate what is the estimated frequency of such transfers.</p> <p><a href="#">Enemalta reply</a>  In 2020 there were 16 transfers from tanker to tank farm and 192</p>

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		<p>Currently the same type of fuel is being stored in the fuel tanks for the bunkering activity ie Heavy fuel oil is being stored in the HFO tanks and gasoil in Gasoil tanks. However a risk assessment study was carried out by Dr. Daniel Balos to study the risks involved if different types of fuel other than those mentioned were to be stored in the fuel tanks at Delimara.</p> <p>Reference is made to the “Quantitative Risk Assessment Study for the change of fuel in Delimara Power Station existing tanks”</p> <p>Copy of this study is being forwarded with this application. Please refer to item (ii) in Supplementary documents of this application</p> <p>A new standard operating procedure has been drafted SOP-187 “Fuel discharge (transfer) from Tank farm to Tanker/Barge at DPS” to address the operation of loading of fuel from tank farm to tanker/barge</p> <p>SOP-187 is currently in approval cycle</p> <p>Copy of draft SOP is being forwarded with this application in Supplementary documents item (iii)</p>	<p>discharges from tank farm to barge/vessel</p> <p>In 2021 from January till June there were 3 transfers from tanker to tank farm and 21 discharges from tank farm to barge/vessel.</p> <p>Kindly provide the drawing No. DPS/FC/041, mentioned in the report. It is understood that no change in fuel storage is being proposed, kindly confirm.</p> <p><u>Enemalta reply</u></p> <p>It is confirmed that no change in fuel storage is being proposed.</p> <p>Requested drawing DPS/FC/041 and approved active</p>

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				<a href="#">document SOP-187 submitted to ERA</a>
	Handling and storage of gas oil (No change)	From receipt of fuel and storage in tank farm to delivery to D3PG for combustion in the diesel engines 5 to 8 and 3.85MW <sub>th</sub> Auxiliary boiler of D3PG	To include the words “D3PG” after the words “auxiliary boiler” at the end of the sentence to discriminate between Enemalta’s auxiliary boiler used for steam generation and the auxiliary boiler of D3PG plant	Agreed
	Handling and storage of gasoil (No change)	From receipt of fuel and storage in tank farm to combustion in DPS 2 to 5 and 4MW <sub>TH</sub> auxiliary boiler of Enemalta	To include the operation of the gas turbines and auxiliary boiler	Noted
		From receipt of the fuel to storage in tank farm and from tank farm to tanker/barge”	<del>To include a new activity of bunkering of gasoil</del>  New standard operating procedure has been drafted SOP-187 to address the loading of fuel from tank farm to tanker/barge. SOP is currently in approval cycle under review	From the SOP provided it is also understood that gas oil in addition to HFO will be transferred from tank farm to tanker/barge, and thus the activity section handling and storage of gasoil. Kindly confirm <a href="#">Enemalta reply</a> Correct both HFO and gasoil will be transferred from tank farm to tanker/barge/

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Associated activity of storage, treatment and disposal/recycling of waste materials (No Change)	Handling, storage, treatment and disposal/recovery of wastes from installation (No change)	From generation of waste to disposal or recycling onsite or offsite (No change)		
Associated activity of maintenance (No change)	Maintenance carried out in any workshop in the installation (No change)	From maintenance activity to appropriate recovery/disposal of any wastes created (No change)		
Other <i>Delete</i>	Decommissioning and dismantling plant constituting DPS phase 1 and ancillary equipment <i>Delete</i>	From decommissioning and demolition as per approved method statements to the appropriate disposal/recovery of resulting waste streams <i>Delete</i>		Noted in view of completion
Other Loading/Unloading to/from vessels on quay	Handling of equipment, materials and supplies	From DPS quay to vessels and vice-versa	To include the activity of transfer of equipment, materials and supplies from quay to vessels and from vessels to quay	Kindly provide more details on the requested amendment, in terms of the nature of the activity. <u>Enemalta reply</u> (i) Transfer of equipment related to: (a) Enemalta generation and distribution activities (b) D3PG generation activities (c) Electrogas Malta generation activities (ii) Transfer of material to and from

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				barges/vessels moored to the DPS quay.
<b>1.3</b>	<b>Information to the Public</b>			
1.3.1	<p><u>Removal of obligation:</u></p> <p>“The operator shall make emission data publicly available via the Internet not later than two months after the production of such data. Nonetheless such data shall be made available to the Authority upon request within 24 hours</p>		<p>Given that Enemalta’s plant at Delimara is being classified as an emergency plant, since it is being operated for a number of hours per year for maintenance purposes, and following official requests from Enemalta and several meetings with ERA, ERA had granted permission for the calculation method to be used to calculate the emissions generated by the gas turbines. This method calculates the total emissions generated based on the total quantity of fuel burnt multiplied by an emission factor. The emission factor is given by EMEP/EEA air pollutant emission inventory guidebook (latest revision)</p> <p>This method gives the total emissions generated in tonnes but does not calculate the concentration of the emissions. So 24 hourly and 48 hourly concentration readings cannot be calculated with this method</p>	<p>ERA will retain condition however, the authority will consider amendment of this condition to reflect that such a requirement will only become applicable in the event that CEM monitoring is required and the plant no longer remains as a back-up plant.</p> <p><u>Enemalta reply</u> Noted</p>
<b>1.5</b>	<b>Improvement Programme</b>			
Table 1.5.1	Improvement programme Requirement			
	<b>Improvements related to residual operations on site</b>			
12	Submission of a baseline report and a monitoring strategy		Land and groundwater monitoring is being carried out in conjunction with the other 2 operators at DPS, D3PG and	

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		<p>Electrogas, under the obligations of the framework permit.</p> <p>Method statement sent and approved by ERA. Land and ground water monitoring study being carried out on a 4-year cycle. 2 monitoring studies have been carried out for Phase 1 and Phase 2. Phase 3 and 4 monitoring studies will be carried out in 2021</p> <p>Report for Phase 1 of the monitoring was sent to ERA for review on 4<sup>th</sup> March 2019. Feedback received from ERA Follow up action to be carried out in 2021 Report for Phase 2 of the monitoring was sent to ERA for review on the 23<sup>rd</sup> April 2020 Awaiting feedback</p> <p>Due to COVID-19 restrictions Phase 3 monitoring could not be carried out in 2020. Permission granted by ERA email dated 10<sup>th</sup> November 2020, to postpone this monitoring to 2021. Phase 3 &amp; 4 monitoring studies will be carried out together in 2021</p> <p>Action Ongoing</p>	<p>Kindly note comments under a separate cover.</p> <p><a href="#">Enemalta reply</a> Noted</p>

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16	Installation of appropriate abatement to the satisfaction of the Authority to mitigate odours from existing fuel tanks		<p>No feedback from ERA with regards to the VOC abatement system installed on HFO tanks 1 &amp; 2 at Delimara.</p> <p>No feedback received from ERA with regards to the request to increase the emission limit for VOCs from 20mgC/Nm<sup>3</sup> to 65mgC/Nm<sup>3</sup></p> <p>Action Pending awaiting feedback from ERA</p>	<p>Noted, as a final position in view that there is no odour complaints the ERA is proposing that no emission limit value is set.</p> <p><a href="#">Enemalta reply</a> Noted</p>
17	Submission of proposals regarding methodology for marine ecological surveys		<p>Submission sent</p> <p>Reference AIS method statement including addendum email sent to ERA dated 5<sup>th</sup> August 2020 and acceptance from ERA email dated 6<sup>th</sup> August 2020</p> <p>Action closed</p>	Noted
20	Updates to the air dispersion modelling study carried out by the Authority as per condition 2.2.1.15 and 2.2.1.14		<p>Tender has been issued and awarded Ambiente S.p.a.</p> <p>Awaiting Method statement from contractor to be forwarded to ERA for approval</p> <p>Action ongoing</p>	<p>Noted</p> <p><a href="#">Enemalta reply</a> Method Statement for this study approved by ERA</p>
26	Establishment, operation of area dedicated for waste management		<p>Completed</p> <p>Action closed</p>	Noted



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	Improvement related to residual operations on site				
27 - 31	Actions in connection with dismantling of Phase 1 A& B			Dismantling completed  All actions closed	Noted
1.8	Transfer and Conversion of specified plant			All 8 diesel engines 1-4 and 5-8 have been transferred to D3PG  Action closed	Noted and agreed to remove condition 1.8
<b>2.2</b>	<b>Emissions to Air</b>				
Table 2.2.1	Emission points to Air				
Release point	Source	Total Thermal Rating MW <sub>TH</sub>	UTM Co-ordinates		
			X-Coordinate	Y Coordinate	
Chimney D1	DPS (Boilers phase 1A and phase 1B)	332	460,038	3,965.822	Agreed
<i>Delete</i>	<i>Delete</i>	<i>Delete</i>	<i>Delete</i>	<i>Delete</i>	
Chimney D2	DPS2 (OCGT1)	121	459,869	3,965,745	
Chimney D3	DPS3 (OCGT2)	121	459,881	3,965,727	
Chimney D4A	DPS4 (CCGT32 By-pass stack)	121	460,088	3,965,766	Noted.
Chimney D4B	DPS4 (CCGT32 Main Stack)	121	460,072	3,965,789	
Chimney D5A	DPS5 (CCGT31 By-pass stack)	121	460,037	3,965,731	Noted
Chimney D5B	DPS5 (CCGT31 Main stack)	121	460,021	3,965,754	

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Chimney Aux	Auxiliary Boiler	4	459,964	3,965,833	<p>To include Auxiliary boiler stack. Auxiliary boiler is being used for steam generation Please refer to drawing DPS/XZ/106 in Supplementary documents item (iv)</p> <p>Coordinates of auxiliary stack given as per Zone 33s datum ED 50 ellipsoid</p>	<p>Noted, kindly supplement such information in the attached MCP form</p> <p><a href="#">Enemalta reply</a> Submission to ERA of registration form for medium combustion plant for Enemalta auxiliary boiler.</p>
2.2.1.3	<a href="#">Delete</a>					Agreed
2.2.1.4	<a href="#">Delete</a>					Agreed
Table 2.2.2	Standards for the analysis of physical and chemical parameters					
	Chemical parameters					
Ash content <a href="#">Delete</a>					This is a requisite for HFO. HFO is no longer being used	<p>Kindly note that Ash content is still required by BAT 9</p> <p><a href="#">Enemalta reply</a> Noted will retain such test in the quality analysis of the fuel</p>
Nickel content <a href="#">Delete</a>					This is a requisite for HFO. HFO is no longer being used	Noted
Vanadium content <a href="#">Delete</a>					This is a requisite for HFO. HFO is no longer being used	Noted.

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2.2.1.17	The operator shall make sure that the frequency of soot blowing and malfunctions is minimised <i>Delete</i>		Soot blowing is utilised for high capacity fuel fired boilers. These have now been dismantled	Noted.
	<b>Determination of start-up and shut-down</b>			
Table 2.2.4	Determination of start-up and shut-down for the respective unit at Delimara Power Station			
	Determination of start-up and shut-down for DPS 1		<i>Delete</i>	Agreed
2.2.2	Emission to Air from DPS 1 (boilers)		<i>Delete all section</i>	Agreed
<b>2.2.3</b>	<b>Emissions to Air from DPS 2-5 (Gas turbines)</b>			
2.2.3.5	The emission limit values specified in Table 2.2.6 shall not be exceeded		No longer valid since calculation method is being used for air emissions	We take note of the comments provided, the permit will reflect the current modus operandi. However the authority proposes that the requirement stipulated in 2.2.3.12 is to remain, thus the conditions related to CEM monitoring in the event that the plant no longer remains a back-
Table 2.2.6	Monitoring and emission limits of DPS 2-5		There is no continuous emissions monitoring system installed	
2.2.3.6			No longer applicable given that there is no continuous emissions monitoring	
2.2.3.7			No longer applicable given that there is no continuous emissions monitoring	

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				up is to feature in the permit.  <a href="#">Enemalta reply</a> Noted
2.2.3.8	For NOx and dust, the emission factor shall be taken to be the worst case scenario emission factor calculated from the pollutant emissions in tonnes reported for NEC during 2012,2013 and 2014 and the electricity generated in MWh for each respective gas turbine. The highest emissions from these years will be the chosen pollutant emission factor which will be multiplied by the power generated per month for the respective gas turbine in order to provide the respective pollutant emission		Condition to be revised Following several meetings and discussions with ERA it was concluded that when emissions for NOx and dust are to be calculated it is more appropriate to use the emission factors quoted by the EMEP/EEA emission inventory guidebook (latest revision) and the quantity of fuel burnt rather than the original method proposed by Enemalta based on power generated multiplied by an emission factor calculated from actual past emissions data measured over 3 years from CEMS installed at Delimara	Noted, the matter is being discussed internally.  <a href="#">Enemalta reply</a> Noted
2.2.3.12	In relation to emissions from DPS 2-5, the Authority reserves the right to request the re-introduction and/or re-calibration of CEMS in the event the plant is no longer utilised as a back-up plant		Given that this condition reintroduces the use of CEMS then this would require that clauses 2.2.3.4, 2.2.3.5, Table 2.2.6,2.2.3.6, 2.2.3.7 be reintroduced after the conditions pertaining to the calculation method	The ERA propose that this condition is retained.  <a href="#">Enemalta reply</a> Noted
<b>2.2.4</b>	<b>Emissions to Air from DPS 2-5 Additional Monitoring requirements</b>		DPS 1-5 to read 2-5 since DPS 1A and DPS 1B have been dismantled	agreed
2.2.4.1	Without prejudice to previous conditions, the operator shall monitor continuously for the parameters listed in table 2.2.7		This condition can only be implemented if a continuous emission monitoring system is installed in the stack. Since	Noted, kindly see comments above ERA

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	using the methods listed in the same table or their equivalent as may be agreed with the Authority		there are no CEMS installed this condition cannot be implemented for DPS2 - 5	will consider during the drafting of the permit.  <a href="#">Enemalta reply</a> Noted
<b>Table 2.2.7</b>	<b>Monitoring of Additional parameters</b>		All parameters mentioned in Table 2.2.7 cannot be monitored without a Continuous Emission Monitoring System	Noted, see comments above regarding continuous monitoring apply.  <a href="#">Enemalta reply</a> Noted
2.2.4.2	In the dual role as permit coordinator and operator of specified plant, Enemalta shall coordinate and update the dispersion modelling study carried out by the Authority, using the data from the plant's air emissions monitoring systems, and ambient air quality monitoring data from Zejtun, Birzebbuga and Marsaxlokk		Air Quality monitoring at Birzebbuga was not obligatory. This was implemented by Enemalta voluntarily. Last monitoring for air quality at Birzebbuga was carried out in 2014.	Noted.
2.2.4.3	Starting from the first half of January 2017, Enemalta plc shall, in its dual role of coordinator and operator of specified plant, coordinate the daily monitoring of PM <sub>10</sub> and PM <sub>2.5</sub> at a location in Marsaxlokk to be agreed with the Authority, in accordance with the standards specified in S.L. 549.59		This obligation will have to be revised or permanently removed depending on the outcome of the air dispersion modelling study update which is going to be carried out during 2021	Agreed
2.2.4.4.	Conditions 2.2.5.2 and 2.2.5.3 shall be read in conjunction with condition 2.3.4 of the regulatory framework permit		Conditions 2.2.5.2 and 2.2.5.3 should read 2.2.4.2 and 2.2.4.3 and condition 2.3.4 of the regulatory framework permit should read 2.3.5	Agreed

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			However these references will probably change with the new revision of the permit	
2.2.6.3 2.2.6.3.1 2.2.6.3.2 2.2.6.3.3 2.2.6.3.4	<p>The Operator must keep record of the following:</p> <p>Validated hourly concentration of TSP, SO<sub>2</sub>, NO<sub>x</sub> and CO</p> <p>24-hourly mean values for the concentration of CO</p> <p>48-hourly mean concentration values of TSP, SO<sub>2</sub> and NO<sub>x</sub></p> <p>Calendar monthly mean concentrations for TSP, SO<sub>2</sub>, NO<sub>x</sub> and CO</p>		<p>The validated hourly concentration, 24-hourly mean values for the concentration of CO, 48-hourly mean concentration values of TSP, SO<sub>2</sub>, and NO<sub>x</sub> and calendar monthly mean concentration for TSP, SO<sub>2</sub> and NO<sub>x</sub> will only be available if there is continuous emissions monitoring.</p> <p>If the calculation method is used these concentrations will not be available</p>	<p>Noted, see comments above regarding continuous monitoring apply.</p> <p><a href="#">Enemalta report</a> Noted</p>
2.2.6.3.5	The total annual load of TSP, SO <sub>2</sub> and NO <sub>x</sub> which shall be calculated by adding the total mass of pollutant emitted per year, on the basis of the volumetric flow rates of waste gases		<p>This method is only available if there is continuous emissions monitoring</p> <p>Using the calculation method the total annual loads of TSP, SO<sub>x</sub> and NO<sub>x</sub> are also calculated but based on the total fuel burnt and an emission factor for each pollutant according to the EMEP/EEA emissions inventory guidebook (latest revision)</p>	<p>Noted, see comments above regarding continuous monitoring apply.</p> <p><a href="#">Enemalta reply</a> Noted</p>
2.2.6.3.6  <i>Delete</i>	<p>For DPS 1, the total load of Ni and V which shall be calculated by adding the total mass of pollutant emitted per year, on the basis of volumetric flow rates of waste gases and by multiplying concentrations in the fuel by fuel use</p> <p><i>Delete</i></p>		<p>This is no longer applicable since DPS1 has been dismantled</p>	<p>Agreed</p>

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<b>2.2.8</b>	<b>Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points: Emergency Considerations</b>			
2.2.8.1	In the case of an interruption in the supply of low sulphur fuel due to a serious shortage, the Director of Environment and Resources may allow a suspension for a maximum of six (6) months from the obligation to comply with the emission limit values for sulphur dioxide from DPS 1		<a href="#">These clauses were applicable when the Enemalta boilers (DPS1A &amp; DPS 1B) and the diesel engines used to operate with Heavy Fuel Oil.</a> <a href="#">The boilers (DPS1A &amp; DPS1B) are now dismantled and the diesel engines no longer operate with Heavy Fuel Oil</a>	Agreed, ERA will consider during the drafting of the permit.  <a href="#">Enemalta reply</a> Noted
2.2.8.2	The Director of Environment and Resources and D3 Power Generation Ltd shall be immediately notified about any interruptions in the supply of low-sulphur fuel			
2.2.8.3	In case the operator opts to control sulphur dioxide emissions from DPS 1 through the use of low sulphur fuel, condition 2.2.8.1 above shall not apply unless the operator secures a supply through a long term supply contract of low sulphur fuel to ensure compliance with the limit value for sulphur dioxide			
2.2.8.4	Notwithstanding condition 2.2.8.1, in case of emergency the operator is obliged to use and supply the fuel having the lowest sulphur content available at the time so as to ensure to the fullest extent possible that the ambient levels specified in S.L. 549.59 and subsequent amendments are not exceeded.			

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2.2.8.5	The operator shall keep together in a log book all notifications compiled after: (a) an interruption in the supply of low-sulphur fuel (b) Notifications communicated to D3 Power Generation Ltd in relation to (a) above			
<b>2.5</b>	<b>Emissions to Marine Water</b>			
<b>2.5.1</b>	<b>Emissions to Marine Water from Specified Points: General Considerations</b>			
2.5.1.17	The operator shall make sure that any sampling and chemical analysis is carried out by a laboratory accredited (or in the process of accreditation), as confirmed by the National Accreditation Body (NAB-Malta) or equivalent) to at least EN ISO17025:2005/Cor 1:2006 and preferably for each and every test listed in table 2.5.2. The operator shall include a copy of the laboratory's accreditation certification in the AER		ISO 17025:2005/COR 1:2006 was withdrawn Current version is ISO 17025:2017	Agreed
<b>2.5.4</b>	<b>Discharges to Marine Water: Other Conditions</b>			
2.5.4.18	The operator shall carry out ultrasonic testing of shell thickness on fuel tanks and report this as part of the AER. Such testing shall be carried out every two year (starting from 2017) for existing fuel tanks, <del>and every five years (starting in 2017) for new fuel tanks servicing DPS6.</del>		Tanks servicing DPS6 are no longer the property of Enemalta	Enemalta to clarify whether this is referring to the four diesel tanks or the day tanks.  <u>Enemalta reply</u> The 4 gasoil tanks at the tank farm are the



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				property of Enemalta so ultrasonic testing of these tanks will be the responsibility of Enemalta. The day tanks mentioned in the Comments column are the D3PG day tanks.
<b>2.9</b>	<b>Odour</b>			
2.9.3	In case of complaints from sensitive receptors regarding odours from the urea solution, the Authority may require the Operator to submit an odour management plan, which would include recommendations for abatement of the odour and timeframes for implementation  <i>Delete</i>		Urea and urea solution are used for the diesel-engine plant. This plant is no longer Enemalta's property so condition is no longer applicable to Enemalta's remaining plant.	Noted, D3PG to confirm.
<b>2.11</b>	<b>Noise and Vibration</b>			
	<b>Noise Monitoring</b>			
2.11.5	Noise monitoring is to be carried out annually, to ensure that the above limits are not exceeded. The locations shall be chosen and the measurements and assessment made according to BS 4142:2014		BS4142L2014 updated to BS4142:2014+A1:2019	Noted
2.11.7	Further to condition 2.11.6, where initial investigations result in the requirement for noise monitoring, this shall be carried out according to BS4142:2014 or standard ISO8297:1994 and any revision		BS4142L2014 updated to BS4142:2014+A1:2019	Noted

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	thereof, and ISO37XX series or specifically ISO 96142:1996			
<b>2.13</b>	<b>Energy Efficiency</b>			
2.13.1	As part of the AER, the Operator shall produce a report on the energy and fuel consumed at the plant permitted through this permit over the previous calendar year, providing the information listed in Schedule 2 in the format specified therein.		Given that Enemalta plant is now an emergency plant and is only being operated for a few hours per month as recommended by the manufacturer, it is not being operated at its optimum conditions and hence it is not being operated efficiently. Hence conditions have to reflect the current mode of operation of the plant	Noted, kindly note replies in BAT  <a href="#">Enemalta reply</a> Noted
<b>2.14</b>	<b>Accident prevention and control</b>			
2.14.9	<a href="#">Delete</a>		Subclauses all refer to the Commissioning phase of D3PG and Electrogas. This has now been concluded. Subclauses are no longer applicable.	Noted, request will be considered when drafting permit conditions.  <a href="#">Enemalta reply</a> Noted
2.14.10	<a href="#">Delete</a>			
2.14.11	<a href="#">Delete</a>			
2.14.12	<a href="#">Delete</a>			
2.14.13	<a href="#">Delete</a>			
2.14.14	<a href="#">Delete</a>			
2.14.21	Condition 2.14.19 is without prejudice to obligations on the operator in his dual role as permit coordinator arising from the regulatory framework permit		Condition 2.14.19 refers to fire fighting agents and systems to be well maintained and certified not to port security. Probably this should read 2.14.20	Agreed

IPPC Ref.	Description of requested change/update to current IPPC permit		Comments	ERA Comments
<b>2.18</b>	<b>Closure and Decommissioning of DPS Phase 1</b>			
2.18.1	Permitted Dismantling and Demolition works <i>Delete</i>		All works in connection with the dismantling and demolition works of DPS Phase 1 have been completed. Section 2.18 to be deleted	Agreed
<b>5</b>	<b>Notifications</b>			
5.2.1	The information listed in Part A Schedule <b>2</b> to this Permit within 24 hours of such notification and		Schedule 1 should read Schedule 2	Agreed
5.2.2.	The more detailed information listed in Part B of Schedule <b>2</b> as soon practicable thereafter			Agreed
<b>Supplementary Documents</b>				
i.	Photos of Auxiliary boiler, diesel/gasoil buffer tank and stack			Noted
ii.	Quantitative Risk Assessment Study for the change of fuel in Delimara Power Station existing tanks			See comments above <a href="#">Enemalta reply</a> Noted
iii.	SOP 187 –Fuel discharge (transfer) from tank farm to tanker/barge at DPS (Draft version)			See comments above <a href="#">Enemalta reply</a> Approved active document SOP-187 is being sent to ERA
iv.	Delimara Site plan drawing DPS/XZ/106 updated to include auxiliary boiler, auxiliary boiler stack and diesel/gasoil buffer tank			See comments above  <a href="#">Enemalta reply</a> Revised Drawing DPS/XZ/106 rev G including auxiliary boiler is being sent to ERA

