

# Case Officer Report


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Subject: IP 0003/25 – Application for the renewal of the IPPC permit for the operation of the Marsa Power Station submitted by Enemalta plc.

Date: 20<sup>th</sup> March 2026

To: ERA Board

From: Regulatory Affairs Directorate

Case Officer: 

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## 1. Background

This report has been prepared for the determination of IP 0003/25, in relation to the renewal of the Integrated Pollution Prevention Control (IPPC) Permit IP 0003/21 submitted by Enemalta plc. The operations on site relate to the operation of a power station carrying out activity 1.1 (combustion of fuels in installations with a total rated thermal input of 50 MW<sup>th</sup> or more) as per Schedule 1 of the Industrial Emissions (Integrated Pollution Prevention and Control) Regulations S.L.549.77. In this regard the renewal application was received on the 31<sup>st</sup> July 2025 and finalised on 6<sup>th</sup> March 2026.

## 2. Case Officer Report

### 2.1. Proposal

The proposed permitted operations are as follows:

<b>Table 1: The Permit Holder is authorised to carry out the activities and the associated activities specified in this table</b>		
<b>Activity listed in Schedule 1 of the Industrial Emissions (IPPC) Regulations / Associated Activity</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Section 1.1: Combustion installations with a rated thermal input exceeding 50 MW <sup>th</sup>	Generation of electrical energy through the combustion of gasoil. The operation of one gas turbine MPS 5	From receipt of fuel to delivery of utility.  Operation of the gas turbine shall be subject to the operating-hour thresholds and associated emission limit values and monitoring requirements specified elsewhere in this Permit, including those applicable to emergency operation (≤ 500 hours per year) and limited-

		hours operation (> 500 and ≤ 1,500 hours per year, assessed as a rolling five-year average)
Directly Associated Activities	Handling and storage of gas oil.	From receipt of the fuel to storage in tank and combustion in gas turbine MPS5.

### Proposed Emissions and Mitigation

**Table 2: Authorised Emission Points**

Emission point reference	Source	Mitigation
MPS5	OCGT9 (Gas turbine 9) – 121 MW <sub>TH</sub>	N/A
DP18	Gas oil bund	Interceptor

### Proposed Emissions Limits

**Table 3 - Emission limits**

Release Point	Parameter	Unit (mg.Nm <sup>-3</sup> )			
		Monthly mean	95% of all 48 hourly values	Yearly average	Daily average
MPS5 <sup>1</sup>	NO <sub>x</sub>	200	220	–	–
	CO	100	–	–	–
	SO <sub>2</sub>	–	–	58	62
	Dust	–	–	2	2.5
DP18	Parameter	Unit (mg/L)			
	Total petroleum hydrocarbons	5			
	PAHs as follows: Benzo(a)pyrene (as a marker for all PAHs)	1.7×10 <sup>-7</sup>			

<sup>1</sup> Monitoring of Gas turbine Emissions (MPS5) in case of operation above 1500 hrs/year.

## Proposed Cumulative Emission Ceilings

<b>Pollutant</b>	<b>Total Annual Load in kilo tonnes</b>
Sulphur Dioxide (SO <sub>2</sub> )	1.23
Nitrogen Oxides (NO <sub>x</sub> )	1.85
Dust (PM <sub>2.5</sub> )	0.2
Ammonia (NH <sub>3</sub> )	0.33

### 2.2. Supporting documents recommended for approval

#### 2.2.1 Documents Numbers:

Document IP 0003/25/57A – Environmental Health Directorate Conditions

#### 2.2.2 Documents:

IP 0003/25 – Permit Document

### 2.3. Applicable law/ policy

The installation carries out of activities which fall within scope of the Industrial Emissions (Integrated Pollution Prevention and Control) Regulations, in particular Activity 1.1:

*“Combustion of fuels in installations with a total rated thermal input of 50 MW<sup>th</sup> or more”*

The proposal is to comply with:

- 2.3.1. Environment Protection Act (CAP. 549);
- 2.3.2. Industrial Emissions (Framework) Regulations (S.L. 549.76)
- 2.3.3. Industrial Emissions (Integrated Pollution Prevention and Control) Regulations (S.L. 549.77)
- 2.3.4. Industrial Emissions (Large Combustion Plants) Regulations (S.L. 549.78)
- 2.3.5. Environmental Permitting (Procedure for Applications and their Determination) Regulations (S.L.549.172)
- 2.3.6. Commission Implementing Decision (EU) 2021/2326 of 31 November 2021 establishing best available techniques (BAT) conclusions for large combustion plants under Directive 2010/75/EU of the European Parliament and of the Council

### 2.4. Site Description and Constraints

The site is located at Church Wharf, Marsa, and covers an area of approximately 64,800 m<sup>2</sup>. The Marsa Power Station historically known for electricity generation has been on cold stand-by since 2016. Most of the structures have been dismantled between 2015 and 2018, with the exception of one gas turbine and its associated diesel tank in the eastern part of the site, as well as the administration buildings in the south-western area. The majority of the site is covered with hardstanding, consisting of either asphalt or concrete.

The surrounding land uses vary:

- To the North, the area is predominantly industrial, including storage and transport-related activities.
- To the East and South lies the Grand Harbour, with further industrial and transport facilities beyond.
- To the West and northwest, land uses include a mix of industrial, commercial, residential, limited agricultural, and recreational or leisure activities.

## 2.5. Site History

The following permitting history is noted on site:

<b>Number</b>	<b>Title</b>	<b>Status</b>
<i>IP 0003/07/A</i>	New application	<i>Granted on 26 March 2010</i>
<i>Not specified</i>	Request for minor variation	<i>Granted on 26 May 2014</i>
<i>IP 0003/07/B</i>	Partial surrender	<i>Granted on 11 June 2015</i>
<i>IP 0003/07/C</i>	Partial surrender and renewal	<i>Granted on 15 September 2017</i>
<i>Not specified</i>	Variation to permit IP 0003/07/C relating to the bund certification	<i>Granted on 7 October 2019</i>
<i>IP 0003/21</i>	Renewal of IP 0003/07/C	<i>Granted on 19 October 2021</i>
	Extension of IP 0003/21	<i>Granted on 3 October 2025</i>
<i>IP 0003/21/V1</i>	Change in Permit Holder Name	<i>Granted on 5 May 2022</i>
<i>IP 0003/21/V2</i>	Change in Permit Holder Name	<i>Not determined</i>
<i>PA 3789/92</i>	Application to construct canteen, clinic, guard room and garages	<i>Granted on 28 July 1993</i>
<i>PA 04887/93</i>	Additional offices at third floor over Generation Building	<i>Granted on 28 July 1993</i>
<i>PA 02353/95</i>	Renewal application for additional offices at third floor over generation building	<i>Granted on 13 August 1995</i>
<i>PA 04965/96</i>	Renewal application for additional office at third floor over generation building	<i>Granted on 21 October 1996</i>
<i>PA 04906/97</i>	To construct a two-storey building	<i>Granted on 20 October 1997</i>
<i>PA 4516/99</i>	Full development application to construct security guardroom at Marsa Power Station [Inside power station complex Marsa.	<i>Granted on 22 September 2000</i>
<i>PA 1071/01</i>	Full development application to construct switchgear room.	<i>Granted on 3 August 2001</i>

<i>PA 01032/01</i>	Installation of telecommunication equipment and antennae over roof	<i>Granted on 23 April 2001</i>
<i>PA 03910/02</i>	Proposed garages at Jesuits Hill	<i>Granted on 19 August 2002</i>
<i>PA 2936/04</i>	Full development application to carry out extension of existing offices.	<i>Granted on 8 November 2004</i>
<i>PA 3908/08</i>	Full development application to carry out minor internal alterations, installation of lift and modifications to main entrance.	<i>Granted on 10 December 2007</i>
<i>PA 4968/08</i>	Full development application to construct a 132KV distribution centre.	<i>Granted on 21 January 2014</i>
<i>PA 3440/09</i>	Renewal development application to carry out extension of offices.	<i>Granted on 19 February 2011</i>
<i>PA 5543/09</i>	Full development application to construct district office at Marsa Power Station.	<i>Granted on 11 September, 2012</i>
<i>PA 2968/13</i>	Amended application for the excavation of an underground tunnel from Marsa power station to Qormi, and the temporary use of working area at Marsa and Qormi	<i>Refused 5 August 2025</i>
<i>PA 3349/14</i>	To decommission, dismantle and demolish Marsa Power Station	<i>Granted on 2 April 2015</i>
<i>DN 1655/14</i>	Development Notification Order to demolish chimneys and tanks at Marsa Power Station	<i>Granted on 7 November 2014</i>
<i>PA 3594/16</i>	Amendments to PA 3908/08 for the tunnel excavation from Marsa Power Station to Qormi Tunnel	<i>Granted on 15 May 2017</i>
<i>PA 00427/18</i>	Change of Use of the underground A-Station to a Data Centre (storage of data Class 6A) including the installation of data servers	<i>Granted on 15 March 2018</i>
<i>PA 03317/18</i>	To sanction amendments to PA3908/08 and PA3594/16 for the Tunnel Excavation from Marsa Power Station to Qormi tunnel	<i>Granted on 14 September 2018</i>

<i>PA 02368/20</i>	Proposed laying of submarine cable from Moll il-Pont, Marsa to Moll tal-Faħam, Paola	<i>Granted on 16 February 2021</i>
<i>DN 1340/20</i>	Filming activities in the empty underground tunnels / halls which used to house the generators of the old power station	<i>Granted on 14 January 2021</i>
<i>PA 4651/23</i>	Installation, commissioning and operation of a battery energy storage system (BESS) within the A-Station in Marsa	<i>Granted on 3 July 2024</i>
<i>PA 08046/24</i>	Removal of dilapidated structures and the construction of a 33kV switch gear room, a substation and 2 ancillary rooms within part of the A-Station in Marsa	<i>Granted on 9 July 2025</i>

## 2.6. Consultations

### 2.6.1. Intra-ERA Feedback

From a compliance and enforcement perspective there are no objections to the proposed extension for Enemalta MPS. The site was found to be compliant during the latest inspection in June 2025, with no administrative fines, penalties, or complaints recorded throughout the current permit's validity. Three routine inspections have been conducted, and no issues were noted regarding air emissions, although the 2024 data is pending review. All required Annual Environmental Reports (AERs) for 2022–2024 and quarterly reports from 2022–2025 have been submitted.

From a waste management and air quality perspective, there were no comments. Regarding the annual noise monitoring, it was recommended that the monitoring frequency be reduced to once every four years. Recent noise studies have shown that there is no significant noise emanating from the installation, with the measured noise levels typically attributable to external sources. From a water perspective it was agreed that discharge point 1 and discharge point 20 can be removed from the permit.

### 2.6.1. Feedback from External consultees

A consultation was carried out in line with regulation 19 of S.L. Industrial Emissions (Integrated Pollution Prevention and Control) Regulations (S.L. 549.77). During the consultation process, the Planning Authority (PA) noted that the site should be covered by a valid planning permit following the approved development. ERA responded by clarifying that the site is already covered by multiple development permits issued over the years, including the Battery Energy Storage System (BESS) approved under PA 4651/23 on 3 July 2024, and confirmed that no planning or development issues are envisaged. No further replies were received from the PA, indicating no additional comments or objections.

The Energy & Water Agency and the Regulator for Energy and Water Services (REWS) stated that they had no feedback, while Water Services Corporation confirmed it has no objection.

The Environmental Health Directorate (EHD) provided standard conditions, which are already incorporated within the permit. Additionally, it was noted that Greenhouse Gas Emissions Permits are now issued by the Climate Action Authority rather than the Malta Resource Authority, and references within the IPPC permit have been updated accordingly to reflect the current legislative framework.

2.6.2. Public consultation on the application was carried out for 15 days as per legal requirements of S.L. 549.77 for renewal applications. The consultation was held between the 27<sup>th</sup> September and 11<sup>th</sup> October 2025. No representations were made by the public.

## 2.7. Discussion

The Marsa Power Station mainly consists of an emergency-use diesel open cycle gas turbine and covers the operations listed under Section 2.1 above. The installation operates strictly on an emergency and limited-hours basis based on an average of 49 hours per annum. The current IPPC permit is valid until 19 April 2026, and the present application concerns the renewal of this permit with no significant changes to the permitted activities. A Battery Energy Storage System (BESS) will be installed within the underground tunnels of the former A-Station and will be operated by Interconnect Malta independently from the site in question. At the time of this assessment, no confirmed installation date is known for the BESS. There are no permitting requirements for the BESS.

In terms of Subsidiary Legislation 549.78 (Industrial Emissions (Integrated Pollution Prevention and Control) Regulations) and Commission Implementing Decision (EU) 2021/2326 of 31 November 2021, establishing Best Available Techniques (BAT) conclusions for Large Combustion Plants under Directive 2010/75/EU, the Marsa Power Station qualifies as a limited-hours operation plant. As such, in the last four years the installation continued to operate below the annual operating hour thresholds stipulated in the above legislation and is therefore subject to the specific derogations applicable to emergency and limited-operational hour plants. The emergency open cycle gas turbine is operated only when required for grid security, system resilience, black-start capability, and emergency supply. Accordingly, the applicability of a number of requirements is assessed in the context of limited operational hours, and the installation remained compliant with the relevant provisions listed in section 2.3.

The BESS installation will be entirely underground and will not introduce new emission sources, point discharges, or any other environment effect. On this basis, it was not deemed that the BESS requires a separate environmental permit, nor was it deemed that the Marsa Power Station requires a modification as a result of this project. Although the geographic footprint of the BESS falls within the current IPPC site boundary, the underground nature of the installation and its operational independence mean that it does not materially affect the environmental risk profile of the permitted installation.

No significant changes to the scope of the permit are being proposed as part of this renewal. The permit's general conditions have been updated to reflect recent Regulatory Affairs Directorate updates and current permitting practice. It is also proposed that the noise monitoring frequency be reduced from annual monitoring to once every four (4) years, in view of the plant's limited hours of operation, historical compliance with noise limits, and the absence of noise-related complaints. As mentioned previously the measured noise levels typically are attributable to external sources. The condition relating to the Greenhouse Gas Emissions Permit has been updated in line with guidance issued by the Climate Action Authority. Moreover, the gas oil bund certification frequency has been

amended from an annual requirement to once every three years, in line with the standard conditions for fuel storage. The weekly visual inspections of the bund have been retained.

The site visit carried out on 13 February 2026 as part of the processing of application IP 0003/25 noted that overall, the installation is being operated in an environmentally compliant manner, and no environmental concerns were identified.

Discussions held on the day confirmed that the OCTG9 installation remains in good operational condition following a recent maintenance programme, with upgraded firefighting systems in place. Fuel handling procedures, including underground fuel transfer and boom deployment, are supported by established SOPs, spill kits, and third-party supervision. No spills, incidents, or complaints have been recorded, and fuel consumption remains low.

The diesel tank bund and associated infrastructure have been refurbished and certified as adequate through a third party warranted engineer. The site visit rekindled the discussion on whether Discharge Points (DP) 1 and 20 should remain within the permit. DP 1, which historically serviced the turbine hall via an oily water interceptor, has long been redundant following the decommissioning of the turbine hall. Similarly, DP20 has become redundant since the partial surrender, as the adjacent road to the tank area and OCTG9 has been opened and resurfaced. At present, DP20 receives rainwater from both the Marsa Power Station site and the adjoining public road. Enemalta explained that they have no operational control over runoff captured by the road gutter, reinforcing the argument that DP20 no longer reflects an installation-related discharge point and may therefore be considered for removal from the permit. To this effect, the site plan in the permit has been amended to remove the aforementioned discharge points.

In terms of compliance history, Enemalta plc. has maintained full compliance with the conditions of the existing permit. All monitoring, reporting, and notification requirements have been adhered to, and no non-compliances have been recorded. The Marsa Power Station continued to operate under a certified ISO 14001 Environmental Management System, which provides a structured framework for environmental control, compliance assurance, and continuous improvement. Regular internal and external audits are undertaken in line with ISO requirements.

In terms of the financial guarantee, the current amount of €16,640 is being recommended for revision to €13,000 since the number of effluent discharge points has decreased from three to one.

An invoice for the annual fee of 2026 has been sent to the applicant on 17<sup>th</sup> March 2026. The settlement of this fee is being included as a post-decision requirement.

## 2.8. Financial Matters

<b>Application fee</b>	€6,077.50 (Paid)
<b>Financial guarantee</b>	€13,000 (currently amounts to €16,640)
<b>Annual fee</b>	€607.75 per annum & variable sum depending number of inspections

## 3. Recommendation:

The Regulatory Affairs Directorate recommends the GRANTING of the Permit for a period of ten (10) years subject to the following conditions as post decision requirements:

- Submission of a financial guarantee of €13,000

- Settlement of the annual fee for 2026 amounting to €807.75

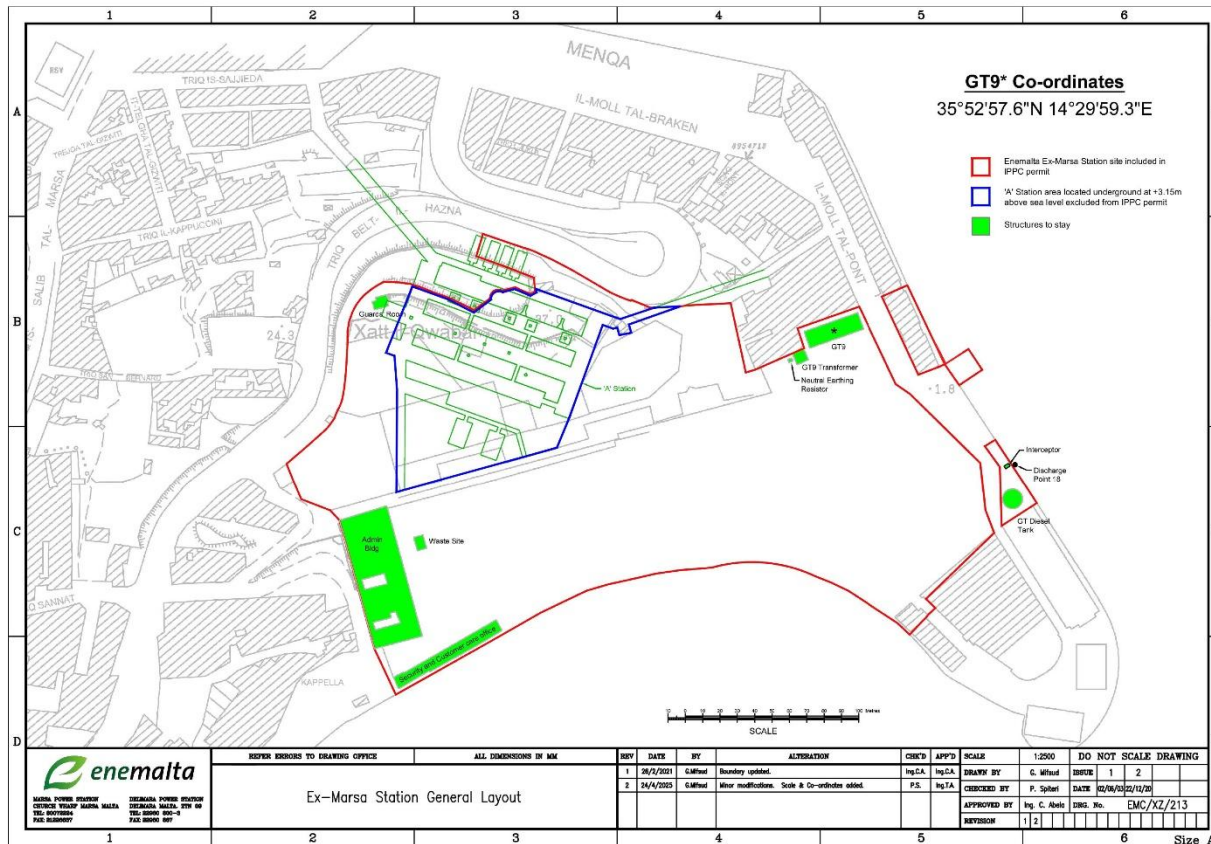
The proposed permit conditions include;

- a) Standard conditions applicable to this sector;
- b) Site specific conditions;

This report to the ERA Board has been prepared, reviewed and endorsed by:

Date: 20 <sup>th</sup> March 2026	Date: 20 <sup>th</sup> March 2026

# Annex 1: Site Plan



The site boundary is outlined in red. Structures relevant to this permit are highlighted in green. for the carrying out of the activities specified in Condition 1.1.1. The extent of the site boundary is indicative and should not be used for interpretation purpose.