

Renewal Application

MPS IPPC Permit

Enemalta plc - IP 0003/07/C

Requested changes to current IPPC permit

IPPC Ref.	Description of requested change/update to current IPPC permit		Comments
1.1	Permitted Activities		
Table 1.1.1			
Activity listed in Schedule 1 of the Industrial Emissions (IPPC) Regulations/Associated Activity	Requested change to current IPPC permit specified activity	Requested change in Limits of Specified activity	Comments
Section 1.1: Combustion installations with a rated thermal input exceeding 50MW	Generation of electrical energy through the combustion of gasoil Installation consists of one gas turbine MPS 5	From receipt of fuel to delivery of utility (No change)	
Associated activity of fuel handling and storage	Handling and storage of gasoil	From receipt of the fuel to storage in tanks and combustion in the combustion plant gas turbine MPS5	There is only one gasoil tank at Marsa delete (s) of tanks and to specify that the combustion plant is made up of only one gas turbine
Associated activity of utilities (Delete)	Sea water pre-treatment plant (Delete)	From intake of sea water to delivery of utility (Delete)	This activity was used when the steam turbines and evaporators were in operation. This activity is no longer being carried out at Marsa

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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, demolition and dismantling of the structures outlined in the IPPC application submitted in July 2017 <i>Delete</i>	From decommissioning and demolition as per approved method statements to the appropriate disposal of all resulting wastes <i>Delete</i>	Dismantling of all structures at Marsa has been completed
1.3	Information to the Public		
1.3.1	<p><i>Removal of obligation:</i></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>		Given that Enemalta’s gas turbine remaining at Marsa 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 turbine. 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

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			pollutant emission inventory guidebook (latest revision) 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
1.5	Improvement Programme		
Table 1.5.1	Improvement programme Requirement		
11			All actions in Improvement program are in connection with the decommissioning of Marsa Power Station Items 11, 13, 21 22 and 23 have been completed Actions Closed
13			
21			
22			
23			
2.	Closure and Decommissioning		
2.1	Permitted Dismantling / Demolition works		All subclauses relate to the dismantling / demolition works Dismantling and demolition works have been completed
3.2	Emissions to Air for MPS 5 (OCGT9)		
3.2.1.2	The operator shall inform the Authority of any test start-ups of these this -turbines intended to ensure their functioning		There is only 1 gas turbine at Marsa wording to read "this turbine"
3.2.1.7	Waste gases from the combustion plants- s within the Marsa Power Station		To read "combustion plant" not plants

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3.2.2	Emissions to Air (excluding Odour, Noise or Vibration) from specified Points – Emission limits and Monitoring of Gas turbine Emissions (MPS5)		
3.2.2.1	Not applicable		<p>These 3 subclauses relate to measurements of concentration of emissions by a continuous emissions monitoring system</p> <p>Given that MPS5 does not have a CEMS and the calculation method is being used as approved by ERA these obligations are not applicable</p> <p>Reference letter from ERA dated 29th July 2016</p>
3.2.2.2	Not applicable		
3.2.2.3	Not applicable		
3.2.2.5	Not applicable		<p>This subclause is related to the use of a Continuous Emission Monitoring System (CEMS) which is not being used in MPS5</p>
3.2.2.7	<p>Not applicable</p> <p>Should be deleted since it is again referred to in 3.2.2.14</p>		<p>This obligation is related to the use of a Continuous Emission Monitoring System</p>
3.2.2.8	<p>For NO_x 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</p>		<p>Condition to be revised</p> <p>Following several meetings and discussions with ERA it was concluded that when emissions for NO_x 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</p>

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			Enemalta based on power generated multiplied by an emission factor calculated from actual past emissions data measured over the 3 years mentioned from CEMS which was installed on MPS5 at Marsa
3.2.2.10	Further to conditions 3.2.3.6, 3.2.3.7 and 3.2.3.8 , 3.2.2.6 and 3.2.2.8, the Authority shall be immediately notified should the operator intend to deviate from such calculation methodology		Subclauses to read 3.2.2.6 and 3.2.2.8 Subclause 3.2.2.7 applies only for CEMS. It does not apply when using calculation method since there are no hourly readings
3.2.2.15	The operator shall measure the concentration of dust (TSP), sulphur dioxide (SO ₂), nitrogen oxides (NO _x) and carbon monoxide (CO) in the exhaust gases of gas turbines MPS5. The annual load of dust (TSP), sulphur dioxide (SO ₂) and nitrogen oxides (NO _x) shall be reported separately using the schedules in A.2.4.2.2 Load shall be calculated on the bases of the waste gas flow rate unless otherwise specified by the Authority		This method is only available if there is continuous emissions monitoring Using the calculation method the total annual loads of TSP, SO _x and NO _x 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)
3.2.2.16	The Operator must keep record of the following data unless otherwise agreed in writing with the Authority:		
	3.2.2.16.1		Validated hourly concentration, 24-hourly mean values, 48-hourly mean values, calendar monthly mean values and total annual load on the basis of volumetric flow rates of flow gases can only be measured and calculated with a
	3.2.2.16.2		
	3.2.2.16.3		
	3.2.2.16.4		
	3.2.2.16.5		

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			Continuous Emission Monitoring System. There is no Continuous Emission Monitoring System installed in MPS5
3.2.2.17	Not applicable		Validation of hourly readings is applicable with the use of CEMS
3.2.2.18	Not applicable		Applicable when CEMS is in use
3.2.2.19	Not applicable		Concentrations are measured by means of CEMS
3.2.2.20	Not applicable		Related to data acquisition by CEMS MPS5 does not have a CEMS installed
3.2.2.21	Not applicable		Applicable only if CEMS is installed
3.2.2.22	Not applicable		Applicable only if CEMS is installed
3.2.2.23	Not applicable		Applicable only if CEMS is installed
3.2.3	Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points – Additional Monitoring Requirements		
3.2.2.24 3.2.3.1	Not applicable		Applicable only if CEMS is installed
3.2.5	Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points – Total Annual Emissions		
3.2.5.1	The Operator shall keep an inventory of the total annual emissions of SO ₂ , NO _x and dust (as total suspended particles) from the combustion plant at Marsa Power Station with a rated thermal input of 50MW _{th} or more, including the gas turbine.		The combustion plant at Marsa Power Station consists of only one gas turbine Subclause to be reworded

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3.2.6	Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points – Performance and Calibration of Automated Measuring Systems Not applicable		Section 3.2.6 deals with obligations in connection with the use of a Continuous Emission Monitoring System. Given that the gas turbine is kept as an emergency plant and only operated for a number of hours per month as recommended by the manufacturer there is no CEMS installed in MPS5
3.5	Emissions to Marine Water		
3.5.1	Emissions to Marine Water (from Specified Points) – General Considerations		
3.5.1.14	The operator shall make sure that all methods of analysis, including laboratory and field method analyses for the purpose of chemical monitoring is carried out by an accredited laboratory (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 Schedule 5. 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
3.6.4	Discharges to Marine Water – Other Conditions		
3.6.4.1	All HFO and The Gasoil storage areas shall be rendered impervious to the minerals stored therein		Delete words “All HFO and” since HFO is no longer used at Marsa and all HFO tanks have been dismantled. There is only one storage area with one gasoil tank
3.6.4.3	The integrity testing of bunds must be carried out according to CIRIA163 Construction Industry Research and Information Association Report 163 – Construction of Bunds for Oil Storage Tanks. The test must be carried out by an approved auditor and the inspection report and any ensuing certification must be included in the AER in the format specified S2.10 – Not Applicable		This method is applicable when bunds are still empty. It is not applicable when there are fuel tanks inside the bunds. ERA had revised this method to be identical to the obligations listed for the

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			Delimara Power Station permit including the requirements as listed in table S2.10 in Schedule 2 Reference letter from ERA dated 7 th October 2019
3.6.4.5	The pipes, pumps, valves and flanges forming part of the system which transfers fuel from the delivery ship to the tanks in the tank farm gasoil tank shall be certified to be leak-proof by an approved auditor at least once every three years. The inspection report and any ensuing certification must be included in the AER in the format specified in S2.10		Tanks in tank farm have all been dismantled. There is only one remaining tank at Marsa which is the gasoil tank
3.6.4.11	All the flanges, valves and over-ground pipes listed in 3.6.6.10 3.6.4.10 shall be certified by an accredited auditor.....		Subclause to read 3.6.4.10
3.9.2	Waste recovery during operations		
	Records		
3.9.2.33	Disposal certificates shall be kept on record and made available for inspection for a period of at least 3 years from date of their issue		These 2 subclauses are duplicated however one says 3 years and the other says 5 years.
3.9.2.34	Disposal certificates shall be kept on record and made available for inspection for a period of at least 5 years from date of their issue		
3.9.2.36	Further to condition 2.1.24 for any decommissioned equipment, the operator shall submit to the Authority a proposal for the screening of the intended equipment to be discarded		Subclause 2.1.24 refers to the dismantling of structures during the dismantling/decommissioning phase. Does this obligation apply to any decommissioned equipment or is it referring to the equipment during the decommissioning phase? If it is referring to the latter then this subclause is to be deleted
3.9.2.36	As part of the Annul Environmental Report for the installation, the Operator shall produce a report on the off-site transfers of waste from the Permitted Installation over the previous calendar year, by end		AER is to be submitted by June of the following year as per subclause 5.2. Hence off-site

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	March-June of each year, providing the information listed in the format specified in schedule 2.10 S2.9		transfers of waste listed in S2.9 not 2.10 are to be submitted by June and not March of the following year
3.10	Odour		
3.10.4	Where the operator has disclosed odour abatement measures to be employed during dismantling, demolition and decontamination processes, these shall be applied as per approved method statements		Given that dismantling and demolition works have been completed at Marsa this subclause should be deleted
3.12	Noise and Vibration		
3.12.5	Noise monitoring is to be carried annually, to ensure that the above limits are not exceeded. The locations shall be chosen and the measurements and assessment made according to BS4142:2014, all the series of ISO 1996 and any other standard methodology stipulated by the Authority. This shall be subject to the submission of a method statement and subsequent approval by the authority prior to the commencement of any monitoring.		BS4142L2014 updated to BS4142:2014+A1:2019 Given that the Marsa gas turbine is being kept as an emergency plant and operated for one or two hours per month ERA approved a revised Method statement for the Noise monitoring at Marsa Noise monitoring is to be carried out during day time only and for a very short duration to reflect the actual operating mode of the gas turbine. Reference to email from ERA dated 24 th September 2018.
3.12.6	During Decommissioning, dismantling and demolition works, measures to decrease nuisance (including noise, vibration, odours and runoff) and other hazards must be determined during demolition and transport of demolition waste. Noise generated must comply to the satisfaction of EPD, with the requirements of BS 5228:Part 1:1984:Noise Control on Construction and Open sites – code of Practice for Basic Information and Procedure for Noise control or its equivalent. <i>Delete</i>		Given that the demolition and dismantling works have been completed Marsa is no longer considered to be a Construction site and hence this subclause is no longer applicable

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3.13	Management and Technically Competent Person		
	Incidents and Complaints		
3.13.9	As part of the AER of the Permitted Installation, the Operator shall provide report on incidents and complaints in the format specified in Sections S2.2.1 S2.11.1 and S.2.2.2 S2.11.2 by not later than end of June after the end of each reporting year		Subclauses to read S2.11.1 and S2.11.2
3.14	Energy Efficiency		
3.14.1	As part of the AER, the Operator shall produce a report on the energy consumed at the Permitted Installation over the previous calendar year by the end of June of each year, providing the information listed in Tables Schedule 2 in the format specified therein.		Given that Marsa gas turbine 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 gas turbine
3.15	Safety Considerations		
	Accident Prevention and Control		
3.15.8	During decommissioning, dismantling and demolition processes the Civil Protection Department shall be formally informed 24hrs prior to commencement of any high risk works <i>Delete</i>		Decommissioning, dismantling and demolition works have been completed at Marsa. Hence obligation is no longer applicable
3.16	Transport		
2.15.1 3.16.1			Subclause should read 3.16.1
2.15.2 3.16.2	Condition 2.16.1 3.16.1 shall also apply		Subclause should read 3.16.2
6	Notifications		
	This section is without prejudice to any other notification requirement in this permit and shall also apply to the demolition and dismantling works permitted through the permit and in the event of		To delete reference to demolition and dismantling works since these have been completed

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	the restarting of MPS5 due to emergencies associated with the Security of Supply		
6.2	The Operator shall submit written confirmation to the Authority of any notification under condition 6.1, by sending:-		
	6.2.3 the information listed in S2.12.1-S2.11.1 according to the timeframe specified in Condition 5.2		
Schedule 8	Fig S8: Site of installation, showing extent of area authorised for activity (outlined in red) <i>(Request for revision of area for activity)</i>		Request to change the extent of area for authorised activity as per revised drawing to exclude the public road behind the gas turbine Refer to Supplementary Documents drawing EMC/XZ/213
Supplementary Documents			
	Drawing EMC/XZ/213 Ex-Marsa Station General layout		