

## 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	ERA comments
1.1	Permitted Activities			
Table 1.1.1				
<b>Activity listed in Schedule 1 of the Industrial Emissions (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>	
Section 1.1: Combustion installations with a rated thermal input exceeding 50MW	Generation of electrical energy through the combustion of gasoil <a href="#">Installation consists of one gas turbine MPS 5</a>	From receipt of fuel to delivery of utility <a href="#">(No change)</a>		Agreed
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 <a href="#">gas turbine MPSS</a>	<a href="#">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</a>	Agreed
Associated activity of utilities <a href="#">(Delete)</a>	Sea water pre-treatment plant <a href="#">(Delete)</a>	From intake of sea water to delivery of utility <a href="#">(Delete)</a>	<a href="#">This activity was used when the steam turbines and evaporators were in operation. This activity is no longer being carried out at Marsa</a>	Noted.
Associated activity of storage, treatment and disposal/recycling of waste materials <a href="#">(No change)</a>	Handling, storage, treatment and disposal/recovery of wastes from installation <a href="#">(No change)</a>	From generation of waste to disposal or recycling onsite or offsite <a href="#">(No change)</a>		
Associated activity of maintenance	Maintenance carried out in any workshop in the installation	From maintenance		

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(No change)	(No change)	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	Noted
<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>		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	<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>Enemalta reply: Agreed</p>

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			<p>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>	
<b>1.5</b>	<b>Improvement Programme</b>			
Table 1.5.1	Improvement programme Requirement			
11			<p>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</p> <p>Actions Closed</p>	Noted
13				
21				
22				
23				
<b>2.</b>	<b>Closure and Decommissioning</b>			
<b>2.1</b>	<b>Permitted Dismantling / Demolition works</b>		<p>All sub clauses relate to the dismantling / demolition works</p> <p>Dismantling and demolition works have been completed</p>	Noted
<b>3.2</b>	<b>Emissions to Air for MPS 5 (OCGT9)</b>			

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3.2.1.2	The operator shall inform the Authority of any test start-ups of <del>these</del> <b>this</b> turbines intended to ensure their functioning .....	There is only 1 gas turbine at Marsa wording to read "this turbine"	Agreed.
3.2.1.7	Waste gases from the combustion plants <del>s</del> within the Marsa Power Station .....	To read "combustion plant" not plants	Agreed
<b>3.2.2</b>	<b>Emissions to Air (excluding Odour, Noise or Vibration) from specified Points – Emission limits and Monitoring of Gas turbine Emissions (MPS5)</b>		
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 29<sup>th</sup> July 2016</p>	<p>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-up is to feature in the permit.</p> <p>Enemalta reply: Noted</p>
3.2.2.2	Not applicable		
3.2.2.3	Not applicable		
3.2.2.5	Not applicable	This subclause is related to the use of a Continuous Emission Monitoring System (CEMS) which is not being used in MPS5	<p>Same as above.</p> <p>Enemalta reply: Noted</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>	This obligation is related to the use of a Continuous Emission Monitoring System	<p>Same as above.</p> <p>Enemalta reply: Noted</p>

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3.2.2.8	For NO <sub>x</sub> 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 NO <sub>x</sub> 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 the 3 years mentioned from CEMS which was installed on MPS5 at Marsa	Noted, it is be noted that this matter is being discussed internally  Enemalta reply: Noted
3.2.2.10	Further to conditions <del>3.2.2.6, 3.2.2.7 and 3.2.2.8</del> , 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	The ERA proposes that this condition is retained.  Enemalta reply: Noted
3.2.2.15	The operator shall measure the concentration of dust (TSP), sulphur dioxide (SO <sub>2</sub> ), nitrogen oxides (NO <sub>x</sub> ) and carbon monoxide (CO) in the exhaust gases of gas turbines MPS5. The annual load of dust (TSP), sulphur dioxide (SO <sub>2</sub> ) and nitrogen oxides (NO <sub>x</sub> ) 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 <sub>x</sub> and NO <sub>x</sub> are also calculated but based on the	Noted, see comments above regarding continuous monitoring apply.  Enemalta reply: Noted

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			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 Continuous Emission Monitoring System. There is no Continuous Emission Monitoring System installed in MPS5	ERA will consider during the drafting of the permit, however please not comments above on CEMS.  Enemalta reply: Noted
	3.2.2.16.2			
	3.2.2.16.3			
	3.2.2.16.4			
	3.2.2.16.5			
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	

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3.2.2.22	Not applicable		Applicable only if CEMS is installed	
3.2.2.23	Not applicable		Applicable only if CEMS is installed	
<b>3.2.3</b>	<b>Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points – Additional Monitoring Requirements</b>			
<del>3.2.2.24</del> 3.2.3.1	Not applicable		Applicable only if CEMS is installed	Same as above Enemalta reply: Noted
3.2.5	<b>Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points – Total Annual Emissions</b>			
3.2.5.1	The Operator shall keep an inventory of the total annual emissions of SO <sub>2</sub> , NO <sub>x</sub> and dust (as total suspended particles) from the combustion plant at Marsa Power Station with a rated thermal input of 50MW <sub>th</sub> or more, including the gas turbine.		The combustion plant at Marsa Power Station consists of only one gas turbine Subclause to be reworded	Agreed
<b>3.2.6</b>	<b>Emissions to Air (excluding Odour, Noise or Vibration) from Specified Points – Performance and Calibration of Automated Measuring Systems</b>  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	Same as above  Enemalta reply: Noted
<b>3.5</b>	<b>Emissions to Marine Water</b>			
<b>3.5.1</b>	<b>Emissions to Marine Water (from Specified Points) – General Considerations</b>			
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.		ISO 17025:2005/COR 1:2006 was withdrawn Current version is ISO 17025:2017	Agreed

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	The operator shall include a copy of the laboratory's accreditation certification in the AER			
3.6.4	Discharges to Marine Water – Other Conditions			
3.6.4.1	<del>All HFO and</del> 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	Agreed
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 Delimara Power Station permit including the requirements as listed in table S2.10 in Schedule 2 Reference letter from ERA dated 7 <sup>th</sup> October 2019	Agreed, upcoming permit will reflect the amendments.
3.6.4.5	The pipes, pumps, valves and flanges forming part of the system which transfers fuel from the delivery ship to the <del>tanks in the tank farm</del> 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	Agreed
3.6.4.11	All the flanges, valves and over-ground pipes listed in <del>3.6.6.10</del> 3.6.4.10 shall be certified by an accredited auditor.....		Sub clause to read 3.6.4.10	Agreed
3.9.2	Waste recovery during operations			
	Records			



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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.	Noted, this will be updated so that disposal records are kept for a period of 3 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	This is to remain but reference to the dismantling condition will be removed.  Enemalta reply: Noted
3.9.2.36	As part of the Annual 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 <del>March</del> June of each year, providing the information listed in the format specified in schedule <del>2.10</del> S2.9		AER is to be submitted by June of the following year as per subclause 5.2. Hence off-site transfers of waste listed in S2.9 not 2.10 are to be submitted by June and not March of the following year	Noted kindly note comments for regulatory consultees  Enemalta reply: Kindly refer to Enemalta's reply in Annex III in connection with comment from Statutory consultees
<b>3.10</b>	<b>Odour</b>			
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	Agreed.
<b>3.12</b>	<b>Noise and Vibration</b>			
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		BS4142L2014 updated to BS4142:2014+A1:2019	Noted.

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	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.	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 <sup>th</sup> 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	Agreed
<b>3.13</b>	<b>Management and Technically Competent Person</b>		
	<b>Incidents and Complaints</b>		
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 <del>S2.2.1</del> <b>S2.11.1</b> and <del>S.2.2.2</del> <b>S2.11.2</b> by not later than end of June after the end of each reporting year	Subclauses to read <b>S2.11.1</b> and <b>S2.11.2</b>	Agreed
<b>3.14</b>	<b>Energy Efficiency</b>		
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	Given that Marsa gas turbine is now an emergency plant and is only being operated for	Noted, ERA will consider during the drafting of the permit

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	information listed in Tables Schedule 2 in the format specified therein.		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	
<b>3.15</b>	<b>Safety Considerations</b>			
	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	Noted
<b>3.16</b>	<b>Transport</b>			
<del>2.15.1</del> 3.16.1			Subclause should read 3.16.1	Agreed
<del>2.15.2</del> 3.16.2	Condition <del>2.16.1</del> 3.16.1 shall also apply .....		Subclause should read 3.16.2	Agreed
<b>6</b>	<b>Notifications</b>			
	This section is without prejudice to any other notification requirement in this permit and shall also-apply <del>to the demolition and dismantling works permitted through the permit and</del> in the event of the restarting of MPS5 due to emergencies associated with the Security of Supply		To delete reference to demolition and dismantling works since these have been completed	Noted
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 <del>S2.12.1</del> S2.11.1 according to the timeframe specified in Condition 5.2			
<b>Schedule 8</b>	<b>Fig S8: Site of installation, showing extent of area authorised for activity (outlined in red)</b>		Request to change the extent of area for authorised activity as per revised drawing to	Reference is made to the email dated 2/7/18 regarding the

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	<i>(Request for revision of area for activity)</i>		exclude the public road behind the gas turbine Refer to Supplementary Documents drawing EMC/XZ/213	reconsideration of outlet 1 and outlet 20. Does Enemalta still wish to pursue this request?  Enemalta's reply: With reference to ERAs queries in connection with this subject in an email dated 31 <sup>st</sup> May 2019, given the limitations of the site, Enemalta reconsidered its proposal and decided to retain outlets 1 and 20 active
<b>Supplementary Documents</b>				
	Drawing EMC/XZ/213 Ex-Marsa Station General layout			Noted