

Annex I: ERA Comments regarding the IPPC application – Enemalta Plc.

Form A

Section	Duly made?	ERA Comments 11 May 2017	Enemalta/General Smontaggi comments 9 th June 2017	Duly made?	ERA comments 14 June 2017 Enemalta comments in red	Duly made ?	ERA comments 5 July 2017
A1.1	✓	Noted					
A1.2	✓	Noted					
A1.3	✓	Noted					
A1.4	✗	<ul style="list-style-type: none"> Kindly provide a copy of the greenhouse gas emissions permit issued to Enemalta plc for the plants which it is permitted to operate as per the current IPPC permit. Kindly provide 	<ul style="list-style-type: none"> GHG Permit enclosed DPS Sewer Discharge Permit enclosed 	✗	<ul style="list-style-type: none"> Noted. Enemalta is to notify ERA once the revised GHG permit is issued. Noted Noted. 	✓	Noted

		a copy of the sewer discharge permit issued to Enemalta plc which is valid.					
A2.1	✓	Noted					
A2.2	✓	Noted					
A3.1	✓	Noted					
A3.5	✓	Noted					
A3.6	✓	Noted					

Form E

Section	Duly made ?	ERA Comments 11 May 2017	Enemalta/General Smontaggi comments 26th May 2017	Duly made ?	ERA comments 14 June 2017 Enemalta comments in red		ERA comments 5 July 2017 Enemalta comments in red
E1.1	✓	Noted					
E2.1	✗	Kindly clarify whether the green line in the submitted	The green line on drawing DPS-XZ-187	✓	Doc reference: 'DPS-XZ-187_Rev.1 (DPS		

		<p>drawing refers to the chlorine water pipeline.</p> <p>Kindly provide a block plan of the structures (boundary A-D) which are proposed for demolition. This should also include a cross-sectional diagram of the chimney and flue gas elbow showing all internal structures.</p>	<p>refers to the chlorination line. Kindly note that during the last years only seawater used to flow through this line.</p> <p>DPS-XZ-187 is infact a block plan/site plan which is scaled 1:1000 to cover all DPS site. I am not understanding what else is being requested, Enclosed please find a separate attachment of the the chimney drawings.</p>		<p>Details & Plant names)</p> <p>Noted.</p> <p>Doc reference: ‘DPS-XZ-189 (DPS Temp. Waste Management Sites).</p> <p>Noted. ERA is to be informed should there be any changes to the proposed temporary waste storage site.</p> <p>Noted.</p>		
E2.2	✘	<p>Kindly note that several variations to the current permit conditions will be required so as to take into account the partial surrender being applied for. Kindly amend application accordingly. This will include but not be limited to:</p> <ul style="list-style-type: none"> • Permitted activities • Sections on emissions to 	<p>Updated version of <i>Form E</i> and <i>E2.2 - Explanation to variation covered by the DPS Partial Surrender</i> enclosed.</p>	✓	Noted.		

		air/water • New conditions to take into account the dismantling activities.					
E3.1	✗	Doc reference: Explanation to variation covered by the DPS partial surrender. (7th April 2017) – 1) With reference to the section 4.2 of this document, kindly provide a timeframe by when SGS Italia shall be submitting their review of the proposed works in the context of the safety studies.	1) <i>Email from SGS Italia</i> being submitted with these replies	✗	Doc reference: Explanation to variation covered by the DPS partial surrender. (7th April 2017) – Doc reference: <i>Email from SGS Italia</i> 1) As indicated in SGS's email regarding the coordinated report, Enemalta is to ensure that the other operators especially Electrogas are informed of the presence of machinery close to any gas pipelines in the vicinity of the HFO and chlorine water pipelines which will be dismantled. Moreover confirmation of SGS's assessment will have to be reviewed by the	✓	Doc reference: Explanation to variation covered by the DPS partial surrender. (7th April 2017) – 1) Enemalta is to refer to feedback provided by the COMAH CA with regards to any updates to the internal emergency plan and coordinated emergency plan in view of any limited access to the escape routes. Updates to these documents will be required prior to commencement of works, and will be stipulated as part of the IPPC permit. ERA is to be kept informed on any feedback provided by the other operators in this regard.

		<p>2) Kindly note that as per condition 2.16.18.4 of IP0002/07Fiii, further studies may be required by COMAH competent authority in relation to safety as part of the regulatory consultation.</p> <p>Doc reference: Program of Works</p> <p>1) Kindly also reference the document titled 'Program of Works' in this part of the</p>	<p>2) Noted.</p> <p>1) Amended</p> <p>2) These</p>	<p>COMAH competent authority and further feedback may be request accordingly. Any risk assessment pertaining to works in the vicinity of the EGM pipeline/assets or which affect access to common roads will be submitted to the other operators.</p> <p>Doc reference: Program of Works_rev2</p> <p>1) Noted.</p>	<p>Noted.</p>
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		<p>application.</p> <p>2) Kindly provide to the preliminary activities indicated in the Program of works, which were meant to commence on 2/5/2017; kindly provide further details on the works which will be carried out in preparation for the proposed demolition works. These should include details of any scaffolding and abatement measures, which will be put in place in order to mitigate dispersion of airborne emissions during the proposed dismantling of the chimney.</p> <p>3) With regards to the waste storage areas which will be constructed, kindly</p>	<p>preliminary activities include the erection of the scaffolding. This work is now expected to begin in August. These will be reflected in updated <i>Program of Works_rev2</i> and updated <i>DPS-POW-001 - Proposed PoW DPS Phase 1_rev 2 (May)</i>.</p> <p>3) Drawing <i>DPS/XZ/189 – Proposed Temporary Waste Management Sites during the DPS 1</i></p>		<p>2) Noted.</p> <p>Doc reference: ‘DPS-XZ-189 (DPS Temp. Waste Management Sites).</p> <p>3) Noted. (‘DPS-XZ-189 (DPS Temp. Waste Management</p>		
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		<p>identify such areas on a plan. Details on the containment provisions which will be implemented should also be provided.</p> <p>4) Kindly update the program of works to include a defined timeframe for the dismantling of the pipelines and the transformers.</p> <p>Doc reference: Decommissioning Plan - RVA</p>	<p><i>Dismantling Works</i> is enclosed. These are only indicative and may be changed and re-submitted to ERA closer to the beginning of the project. The proposed area for hazardous waste will be bunded to contain 110% of the expected stored hazardous waste.</p> <p>4) Updated <i>Program of Works_rev 2</i> and <i>DPS-POW-001 - Proposed PoW DPS Phase 1_rev 2 (May)</i></p>		<p>Sites).Further comments on containment of runoff into the sump are referred to below.</p> <p>4) Noted.</p>		
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		<p>1) With regards to the Decommissioning Plan kindly note that Annex A of the said document is missing.</p> <p>2) Kindly indicate when Enemalta intends to carry out the additional soil monitoring investigations which are being recommended in this report.</p> <p>3) Kindly confirm whether any sub-surface excavation works will be undertaken during the Phase 1 decommissioning works.</p>	<p>1) Annex A enclosed.</p> <p>2) Land and ground monitoring will be done as per IPPC requirement. Enemalta has submitted its proposal to ERA.</p> <p>3) No.</p>		<p>Doc reference: Decommissioning Plan - RVA</p> <p>1) Noted.</p> <p>2) Noted, feedback from ERA regarding the land and ground monitoring will be done separately.</p> <p>3) Noted.</p>		
E.3.2	✘	Doc reference: Method Statements General		✘	Doc reference: Method Statements General	✓	<p>Doc reference: Method Statements General</p> <p>Doc reference: ES_GSM002_Risk</p>

		<p>1. Kindly provide a copy of the risk assessments and safe work method statements which should be prepared prior to the commencement. Should any amendments be made to the 'Works Method Statements' submitted as part of this application, kindly note that such documents are to be resubmitted to ERA accordingly in due time for approval prior to any commencements of</p>	<p>1) RA-SWMS will be submitted by the end of June once the Works Method Statements are finalised.</p>		<p>1) Document produced by PT Matic (POW, MS, RA DPS Phase 1 Demolition ver 1) is noted. Enemalta is to kindly clarify whether other risk assessments mentioned in the works method statement GS are the ones which will be submitted by end of June.</p> <p>Yes and these are being submitted along with this email.</p> <p>Kindly note that further revisions to the RA-SWMS may also be requested once the HAZMAT report is submitted.</p>	<p>Assessment_chimney_June 2017_final</p> <p>Doc reference: ES_GSM002_Risk Assessment_HFO pipelines_June 2017_final</p> <p>1) Enemalta is to provide RA referred to in the respective method statements for the following:</p> <ul style="list-style-type: none"> • Turbines • Boilers <p>These submissions are to be provided at least prior to the execution of works.</p> <p>ES_GSM002_Risk Assessment_boilers_turbines_generators_transformers_June ...is being submitted to cover the turbines, boilers, generators and transformers dismantling.</p>
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		the work.			Noted.		
		2. Kindly provide information as to whether any switchgear shall be removed from the proposed demolition works. Depending on the location of the switchgear the corresponding works method statements shall be updated accordingly, including disconnection procedures and any measures in place to ensure that no SF ₆ leaked during such removal.	2) No Gas insulated switchgear (GIS) will be decommissioned or dismantled. None of the GIS are situated in any of the boundaries.		2) Noted.		
		3. The timeframes and stepwise decommissioning methodology indicated on page 5 of the WMP should be added to the respective 'Works	3) Method statements updated.		3) Noted.		

		<p>Method Statements’.</p> <p>4. With regards to the cooling waters emanating from DPS-1, kindly clarify whether the pipelines discharging effluent from this plant through ‘Hofra iz-zghira’ and those abstracting water from Marsaxlokk Bay will be blocked prior to the dismantling works. Moreover kindly provide details and specifications on the change in flow which is envisioned as a result of this decommissioning.</p>	<p>4) As explained during the site visit, the pipelines discharging effluent through Hofra z-zghira are not situated in any of the boundaries and will not be decommissioned. The D1 sea water pipes will be blanked from the condenser inlet and outlet in the turbine hall. No material from the turbine hall area can thus end up in the sea. The details of flow variation are explained in document <i>E2.2 - Explanation to variation covered by the DPS</i></p>		<p>4) Noted.</p>		
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		<p>Doc reference: DPS-WMS 01-Chimney</p> <p>1) With regards to the section on safety precautions prior to works, kindly clarify which elements in the vicinity of the chimney will be protected through the use of metal elements and brick walls.</p> <p>2) Kindly clarify whether the fifth bullet should refer to cleaning of the area under the chimney prior to its dismantling. Kindly clarify whether internal cleaning of</p>	<p><i>Partial Surrender.</i></p> <p>Doc reference: DPS-WMS 01-Chimney</p> <p>1) The dismantling will incorporate the bringing down of all demolition waste inside the chimney itself. As such, no debris is expected to fall far away from the chimney, thus not requiring any protection of the elements in the vicinity.</p> <p>2) There is nothing to clean under the chimney before works start. During the demolition, cleaning will be done after the material is</p>		<p>Doc reference: DPS-WMS 01-Chimney</p> <p>1) Noted.</p> <p>2) Noted with respect to the clarification of cleaning under the initial chimney structure.</p>		
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		<p>the chimney will be carried out prior to dismantling.</p> <p>3) Certification of all equipment is to be provided.</p> <p>4) Document shall be updated to indicate the removal of the L-shaped horizontal flue inlet ducting.</p> <p>5) Kindly provide a list of the constituents which will be dismantled during the first step of the</p>	<p>dismantled from the chimney. Further details are provided in the method statement.</p> <p>3) This will be provided at a later stage, before works start.</p> <p>4) Method statement updated to indicate that this will be removed first, cleaned from flyash, and that eventually the hole will be blocked so when the concrete wind shield is being demolished, no dust emanates from this hole.</p> <p>5) Method statement updated with pictures and explanation of the different steps.</p>		<p>3) Noted</p> <p>4) Noted.</p> <p>5) Noted.</p>		
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		<p>chimney demolition. In addition, kindly indicate whether the internal metal frameworks and chimney pipes will be removed during this first step throughout the entire length of the chimney and how these will be lowered to ground level.</p> <p>6) With reference to second demolition step in section 5, kindly explain how concrete parts of the chimney being cut-up through the mini-excavators, will be lowered to ground level in view that the statement states that no cranes will be used. In particular an openings in the chimney side walls, resulting from the</p>					
		<p>6) With reference to second demolition step in section 5, kindly explain how concrete parts of the chimney being cut-up through the mini-excavators, will be lowered to ground level in view that the statement states that no cranes will be used. In particular an openings in the chimney side walls, resulting from the</p>	<p>6) Method statement updated. As depicted in the method statement, the final 30 metres will be demolished using a crawler excavator equipped with a long boom.</p>		6) Noted.		

		removal of the flue gas elbows					
		7) Kindly provide details on any containment measures which will be installed around the side walls and throughout the whole length of the chimney so as to minimize dispersion of dust and other debris which will be generated throughout the dismantling process. In particular how the openings generated to the removal of the L-shaped flue inlet ducting shall be sealed off.	7) As explained above, all concrete demolition debris will be thrown into the inside of the chimney, thus minimizing dust dispersion. A plastic shield will be used to cover the holes where there were the openings generated to the removal of the L-shaped flues. Method statement updated accordingly.		7) Noted.		
		8) With regards to the utilization of the fog cannon for dust suppression, kindly indicate how runoff from the wetting	8) Fog cannon will produce a mist so minimal run off is expected. Any run-off that would be		8) Noted. Enemalta is to indicate the location of the sump on the map. (DPS-XZ-189 (DPS Temp. Waste Management Sites) or		8)Noted, submissions are to be provided prior to commencement. Drawing DPS-XZ-189 has been updated to show the location of the sump.

		<p>process will be managed on site. Kindly indicate any containment zones on an adequate plan.</p>	<p>generated would be only water mixed with non-hazardous demolition dust. It is expected that the moisture in the cannon will dry rapidly on deposition, given the prevailing weather conditions expected during works. Nevertheless, any waters that might persist will be collected in the sump that forms part of the storm water system that caters for the DPS 1 area. Any dust will be allowed to settle and this water shall be directed towards re-use as irrigation. The method statement has been updated</p>	<p>to confirm which sump from previous drainage maps of previous years. Moreover once further details regarding the construction of the WMA is available, Enemalta is to provide the following information:</p> <ul style="list-style-type: none"> • Area of the bund? • Details of construction methodology? • Notification to ERA on the date of construction of bund <p>Enemalta will be submitting this information in the coming days.</p> <p>ERA is to be informed should there be any changes to the proposed temporary waste storage site.</p> <p>Noted.</p>	<p>Details of waste containment area will be provided to initiation of works in an updated version of the Waste Management Plan.</p>
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		<p>9) Kindly reconfirm whether a designated waste management area will be utilised for storage of waste generated from the entire dismantling process. Kindly refer to point 3 section E3.1 regarding further details in the waste management area.</p> <p>10) Kindly note that internal structures which have been in contact with flyash can only be classified as non-hazardous following adequate testing of the structure.</p>	<p>accordingly.</p> <p>9) Drawing <i>DPS/XZ/189 – Proposed Temporary Waste Management Sites during the DPS 1 Dismantling Works</i> is enclosed.</p> <p>10) The environmental monitor will be on site to monitor the dismantling. The internal metal lining will be inspected per segment and it will be decided whether there is any visible flyash deposits. However, as per photos of the</p>		<p>9) Noted. Kindly refer to point 8 above with regards to the waste management site.</p> <p>10) Kindly ensure that photos of the internal structures are to be provided to ERA at periodic intervals or as deemed necessary. Daily progress reports should be provided for the duration of the entire chimney demolition operation. This requirement will be included as a permit condition. Noted. Daily reports</p>		<p>10) Noted this will be included as a permit requirement. Noted.</p>
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		<p>11) Kindly clarify the statement ‘... the innermost part of the chimney are to</p>	<p>internal part of the metal flue pipes enclosed, which were taken during the last inspection, the internal walls appear to have no deposits whatsoever. Should segments be identified with deposits, these will be separated from the rest and temporarily stored in the banded area, and a methodology for cleaning will be submitted to ERA for their approval. This will be reflected in the updated method statement.</p> <p>11) See comment in 10)</p>	<p>with photographic evidence will be issued.</p> <p>11) See Comment 10 above.</p>		
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		<p>be considered as non-hazardous.’</p> <p>12) Kindly clarify whether the two internal steel flues, insulation & cladding will be removed as part of the initial step during which the integral structures of the chimney are to be dismantled.</p> <p>13) Kindly clarify whether testing of all structures will be carried out following the removal works.</p>	<p>12) After the L-shaped horizontal inlet ducting has been removed, we start with the lowering of the steel flues as explained below, followed with the removal of insulation and cladding once lowered to the ground.</p> <p>13) Testing will be carried out only where it is deemed necessary by the environmental monitors for structures which came in contact with flue gas after consultation with ERA.</p>		<p>12) Noted.</p> <p>13) Noted.</p>		
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		<p>14) Kindly clarify whether any core drilling will be carried out so as to determine the thickness of the various internal structures making up the chimney, this may assist in identifying volumes after waste characterisation.</p>	<p>14) No cores are being proposed since the concrete is considered to be non-hazardous and inert. As for the top part which looks black, once the scaffolding is erected, the level of contamination will be inspected, a sample will be taken, and if found to be hazardous, the 'black' part will be scraped off, and the remaining concrete re-tested, until it results as inert. Method statement has been updated accordingly.</p>		<p>14) Noted. ERA to be kept updated in this regard during the demolition process. Noted.</p>		
		<p>15) Kindly update the method statement so as to include details regarding the segregation, handling and transportation of all</p>	<p>15) The insulation of the L-pipe is to be removed first. It will be stored in jumbo bags in the non-</p>		<p>15) Noted.</p>		

		<p>debris, hazardous material and construction materials generated as part of the dismantling process.</p> <p>16) Kindly indicate how cleaning of such structures will be carried out, together with any testing of internal residues.</p>	<p>hazardous area. Flyash in the L pipe will be removed and stored in jumbo bags within the bunded area. Then the metal will be removed and inspected as described in section (10) above. Method statement has been updated accordingly.</p> <p>16) Metal to be visually checked as described above. As for cleaning from oils, rockwool, calcium silicate and flyash will be carried out according to the PTMatic Method statement, <i>POW, MS, RA DPS Phase 1 Demolition ver1</i></p>		<p>16) Noted.</p>		
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		<p>Doc reference: DPS-WMS 02-Boilers</p> <ol style="list-style-type: none"> 1. Kindly provide a list of the all the components forming part of each boiler, especially the equipment being referred to in the HAZMAT plan and WMP (ex. draught fans, drains tanks, blow down tanks, steam lines etc). The method statement shall be updated to include removal procedures which will be followed for such structures. 2. Kindly provide a schematic diagram showing the major mechanical components making up each boiler. 3. In relation to section 3, kindly provide 	<p>Doc reference: DPS-WMS 02-Boilers</p> <ol style="list-style-type: none"> 1) Refer to document <i>DPS Demolition constituent material sheets</i> enclosed. 2) Boiler drawings are enclosed. 3) Refer to document <i>DPS Demolition</i> 		<p>Doc reference: DPS-WMS 02-Boilers</p> <ol style="list-style-type: none"> 1) Noted information submitted as part of the material sheets is deemed adequate in response to ERA's first review. 2) Noted. 3) Noted. POW, MS, RA DPS Phase 1 Demolition ver2' being 		<p>Doc reference: DPS-WMS 02-Boilers</p> <ol style="list-style-type: none"> 3) Noted POW, MS, RA DPS Phase 1 Demolition ver4 is being
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		<p>separate method statements on how all hazardous components identified in the second bullet on this section (electrical/electronic circuits, gases, oil & flyash... etc) will be removed from the boiler and handled prior to disposal.</p> <p>4. Kindly provide details on the testing to be carried out on the insulation material removed from the various parts of the boiler. In the HAZMAT sampling plan no such testing is indicated.</p> <p>“ insulation must be removed according to the removal procedures. It shall be considered non-hazardous unless the</p>	<p><i>constituent material sheets</i> enclosed.</p> <p>4) As discussed during the meeting, insulation material can be visibly inspected to determine whether it is contaminated or not with oils/ashes. Should contaminated rockwool be identified, these will be segregated from</p>	<p>submitted to include the method statement related to the handling of WEEE components during the dismantling process as identified in the constituent material sheet document.</p> <p>4) Noted. ERA to be kept updated in this regard during the demolition process. Daily reports submitted to ERA during the dismantling should include photographic evidence throughout the incremental dismantling envisioned for the two hanging boiler structure. Noted.</p>	<p>submitted to take note of legislation update in the Statutory consultation feedback.</p> <p>4) Noted, this will be included as a permit requirement. Noted.</p>
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		<p>sampling an subsequent HAZMAT survey identifies it as otherwise, or it is contaminated with oil/flyash.”</p> <p>5. Kindly note that testing of the insulation material shall be carried out for the various elements in which such insulation is found.</p> <p>6. With regards to the temporary deposit/accumulation area for the insulation waste, kindly clarify what is meant by the following ‘already pelletized and coated to be ready for disposal off-site’.</p> <p>7. Kindly clarify how and at which stage</p>	<p>the rest and disposed of as hazardous.</p> <p>5) Same comment as (4).</p> <p>6) Insulation will be temporary stored on site inside jumbo bags to be ready for transportation to a permitted waste site. Method statement has been updated.</p> <p>7) Before starting the dismantling works of the</p>		<p>5) Noted. Same comment as (4)</p> <p>6) Noted.</p> <p>7) Noted.</p>		
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		<p>HFO and other liquids will be drained from the boiler and any associated structures. Also provide details regarding the storage location of such oils.</p> <p>8. Kindly provide further details on any additional measures besides 'water spreading' which will be adopted to reduce dispersion of crystalline silicate. Additionally kindly provide details as to how any runoff generated during the water spraying will be contained.</p>	<p>boiler, HFO will be drained. The waste oils will be stored in a bunded location, with the proposed site being shown in the site plan submitted.</p> <p>8) In order to reduce dispersion of insulation (not calcium silicate, since this is found in the turbines), the boiler will be jacked and lowered to the ground, at which point the insulation will be removed manually at ground level without throwing it from high levels, causing dispersion of insulation fibres. Drawings of this</p>		<p>8) Noted. However kindly note that the method statement still makes reference to the aforementioned methodology.</p> <p><i>'During the demolition of these parts, suitable measures shall be adopted to reduce the dispersion of crystalline silica, e.g. water spraying as described below. The reduction of dust produced by the demolition of any refractory linings shall be carried out by water</i></p>		<p>8) Noted, submission of the updated MS must be submitted for approval and vetting prior to the commencement of the works.</p> <p>Noted and updated method statement will be submitted.</p>
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		<p>9. Kindly clarify whether the furnace will be cut and dismantled or whether it will be whether disposed of as a whole.</p>	<p>methodology for boiler lowering have been included in the updated method statement.</p> <p>9) The flyash within the boiler will be first emptied from the bottom hoppers and collected in jumbo bags. The boilers were washed during the last major maintenance intervention. As such, it is not expected to find large amount of flyash deposits attached to the furnace side walls. The intention is to cut</p>	<p><i>mist sprays.</i>''</p> <p>Enemalta to confirm whether this abatement will be used or not.</p> <p>This will be clarified in an updated version of the method statement to be submitted in the coming days.</p> <p>9) Kindly refer to the WMA bunding and drainage queries highlighted in the above comments.</p>		
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			<p>the furnace into pieces before lowering it to the ground, where the state of the furnace walls is inspected by the environmental monitor, and if found to contain large amounts of flyash deposits against the sides, these furnace parts are transported to be washed up in the designated bunded area and waste water collected, left to evaporate and disposed of as hazardous waste. Method statement has been updated accordingly.</p>				
		<p>10. Kindly clarify how the furnace will be cleaned prior to its</p>	<p>10) See reply for item (9)</p>		<p>10) Noted. Kindly refer to the WMA bunding and drainage</p>		

		<p>removal.</p> <p>11. Kindly provide specifications of any equipment mentioned.</p> <p>Doc reference: DPS-WMS 03-Turbines</p> <p>1. Kindly provide a list of the all the components forming part of each turbine/generator.</p> <p>2. Kindly provide a list of the all the components in the ancillary equipment found in the turbine hall, especially the equipment being referred to in the HAZMAT plan and WMP (ex.</p>	<p>11) If you are referring to the cranes and excavators, these will be certified before works start and certificates submitted to ERA.</p> <p>1) Refer to document <i>DPS Demolition constituent material sheets</i> enclosed.</p> <p>2) See point (1)</p>	<p>queries highlighted in the above comments.</p> <p>11) Noted.</p> <p>Doc reference: DPS-WMS 03-Turbines</p> <p>1) Noted.</p> <p>2) Noted. Noted information submitted as part of the material sheets and updated method statement is deemed adequate in response to ERA's first review.</p>	
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		depressurising panels, water box priming systems, dosing skids for caustic soda and ammonia etc). The method statement should be updated to include removal procedures which will be followed for such structures.					
		3. Kindly provide a schematic diagram showing the major mechanical components making up the turbine/generator and any ancillary equipment.	3) Turbine and generator drawings and photos are attached.		3) Noted.		
		4. Kindly specify which minor auxiliary / equipment are not going to be removed and specify whether the intention is for reuse or ultimately	4) All plant and equipment to be decommissioned will be dismantled and disposed of as per waste stream. There will not be		4) Noted.		

		for eventual disposal.	<p>any reuse of any of these equipment.</p> <p>However, within the DPS 1 turbine hall, there is auxiliary equipment that also caters for the other plant operations. Namely these are the 3.3kV switchgear and all the other plants and air compressors that supply service air to workshop and control and service air to DPS 2B plant. There are also common service pipelines, cables, distribution boards, firefighting systems, battery systems and associated DC systems, etc that</p>				
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			will remain in use for the remaining plant in operation.				
		5. Kindly provide a list of plausible hazardous components which might be detected during the dismantling of the turbine hall.	5) Refer to document <i>DPS Demolition constituent material sheets</i> enclosed. The HAZMAT to be submitted may indicate others.		5) Noted.		
		6. Kindly indicate whether the same procedure described for draining of lube oil from the turbines will be used for emptying of lube oil from the ancillary pipework. Kindly also indicate any procedures which will be taken to ensure rigorous cleaning of the pipework from lube oil.	6) Yes this has been clarified in the updated method statement. The cleaning methodology of the pipework from lube oil will also be described in the method statement.		6) Noted.		

		<p>7. Kindly clarify whether amendments to the structure of the turbine hall are foreseen. Moreover is there an indication on the final use of this building, since this may need to be addressed through the permit?</p> <p>Doc reference: DPS-WMS 04-Transformers</p> <p>1. Kindly provide a list of the all the components forming part of each of the four transformers.</p>	<p>7) For every equipment removed from the turbine hall, the gaps will be sealed for safety reasons. The turbine hall structure per se will remain intact. The turbine hall will continue to be used to house common services, pipework and cables which are already there, servicing the other plants.</p> <p>1) Refer to <i>Transformer image</i> for a cross-sectional view of a typical transformer.</p>		<p>7) Noted.</p> <p>Doc reference: DPS-WMS 04-Transformers</p> <p>1) Noted.</p>		
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		<p>2. Kindly provide a schematic diagram showing the major mechanical components making up the each of the four transformers.</p> <p>3. Kindly indicate whether the lubricating oils will be tested for PCBs prior to being removed from the transformers, and if tests obtained are positive kindly clarify whether the method statement for draining of such oils would be updated.</p>	<p>Refer to document <i>DPS Demolition constituent material sheets</i> enclosed for breakdown of constituent materials.</p> <p>2) Refer to document <i>DPS Demolition constituent material sheets</i> enclosed for breakdown of constituent materials.</p> <p>3) A .pdf report with covering letter from the lab has been included in the Sampling Plan. As discussed during the meeting, the levels are much lower than the threshold, and as such, no PCB</p>		<p>2) Noted.</p> <p>3) Noted.</p>		
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		<p>4. Kindly clarify whether the removal of electrical components from the transformers will be carried out prior to any hot-cutting.</p>	<p>testing is deemed necessary. The oils will be sent for disposal to an authorised facility as hazardous waste.</p> <p>4) No hot cutting works will be carried out on the transformers. Any WEEE will be removed manually before starting any cutting works, which will be carried out by means of an excavator scissors to cut the transformers into smaller pieces inside the bunded area. Any residual oil will be cleaned prior to disposal. All cleaning will be done inside the bund. Method</p>		<p>4) Noted. Enemalta is to ensure the waste is separated by the appropriate category.</p> <p>Noted.</p>		
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		<p>Doc reference: DPS-WMS 05-Pipelines</p> <p>1. Kindly indicate the measures which will be adopted during the dismantling of the pipework, so as to protect any pipelines utilised by other operators for fuel transmission. Discussions with the effected operators will be required.</p>	<p>statements to be updated accordingly.</p> <p>Doc reference: DPS-WMS 05-Pipelines</p> <p>1) Where pipework is on racks in the vicinity of the other operators' pipework, or Enemalta's pipework to remain intact, all cutting works will be cold cutting and done manually. Risk assessments will be prepared and submitted to the other operators for their feedback and any necessary update.</p> <p>2) Drawing</p>		<p>Doc reference: DPS-WMS 05-Pipelines</p> <p>1) Enemalta to indicate when the risk assessments will be submitted. These are being submitted along with these replies.</p> <p>2) Noted.</p>	<p>Doc reference: DPS-WMS 05-Pipelines</p> <p>1) Enemalta is to note that further feedback from the COMAH CA may be provided at a later stage. Changes to the method statements may be required following receipt of such feedback. Noted and feedback to COMAH submitted in the Statutory consultation feedback document.</p>
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		<p>2. Kindly provide a detailed plan showing the route of all the three HFO lines and the ex-chlorine line.</p> <p>3. With regards to section 2, second bullet, kindly clarify whether other pipelines (besides those containing HFO and the chlorine line) are being referred to.</p> <p>4. Kindly clarify whether the HFO present in the pipelines will be tested to determine the exact viscosity.</p>	<p>DPS/XZ/187_Re v 1 has been updated to show pipework to be dismantled.</p> <p>3) No, only those pipelines specified in the method statement will be dismantled. However, this could entail the cordoning off part of the common roads.</p> <p>4) The contractor needs to empty the HFO pipes from any remaining HFO and bottom sludge before dismantling. However, there is no need for such viscosity test, as only minimal residues of oil</p>		<p>3) Noted.</p> <p>4) Regarding the manual cleaning, kindly clarify whether the contractor shall be cutting the pipeline is parts small enough for manual cleaning to take place or whether alternative means of cleaning will be used. This will be clarified in an updated version of the method statement to be submitted in the</p>		<p>4) Noted this will be required prior to the commencement of such works. Noted and updated method statement will be submitted.</p>
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			<p>will remain against the pipes, which would then be cleaned manually in the bunded area once cut.</p> <p>5) No organic solvents will be used. The method which has been identified is to use rags to manually clean the pipes. Using steam may be considered, in such case, an updated method statement will be submitted to ERA.</p> <p>6) A bunded area will be used for such cleaning.</p>		<p>coming days.</p> <p>5) Noted. ERA is to be updated on any amendments. Noted.</p> <p>6) Noted. Enemalta is ensure that oily water is collected and disposed of adequately. Noted.</p>		
		<p>5. Kindly clarify whether cleaning using steam and any other with organic solvents will be utilised for cleaning of the pipework prior or following the removal from the piperack.</p> <p>6. In the event that pipes, will be thoroughly cleaned within another</p>					

		<p>location within DPS, such a locations shall be disclosed include containment measures against spillages.</p> <p>7. Kindly clarify if any testing will be carried out on the ex-chlorine and HFO pipework prior to its disposal.</p>	<p>7) Ex-chlorination pipework has contained only sea water for the last years, as explained during the site visit. As such, no testing is foreseen on this pipework. The HFO pipework will be visually tested by the monitor, with photographic evidence to show that they have been adequately cleaned.</p>		<p>7) Noted.</p>		<p>Doc reference: HAZMAT Sampling plan - General</p> <p>Enemalta is to ensure that an updated HAZMAT sampling plan is submitted to include ERA's previous comments.</p> <p>Noted and an updated HAZMAT will be submitted before initiation of works.</p>
		<p>Doc reference: HAZMAT Sampling plan - General</p>	<p>Doc reference: HAZMAT Sampling plan - General</p>		<p>Doc reference: HAZMAT Sampling plan - General</p>		

		<p>1. With reference to appendix 2, kindly submit an updated accreditation certificate.</p> <p>2. For each of the laboratory analysis is table 1 and table 2, kindly provide the analytical method used, limit of detections and standard/s used for each parameter.</p>	<p>1) Updated lab accreditation certificate enclosed and included in revised Sampling Plan.</p> <p>2) Lab details provided and to be included in the revised sampling plan.</p>		<p>1) Noted.</p> <p>2) With regards to the proposed standards for testing Enemalta is to ensure that the following standards are to be utilized for the basic characterization of waste to determine the total content in the material (mg/Kg):</p> <p>EN 14899:2005 Characterization of waste. Sampling of waste materials. Framework for the preparation and application of a sampling plan</p> <p>Digestion of raw waste</p> <p>EN 13656:2002</p>		
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					<p>Characterization of waste. Microwave assisted digestion with hydrofluoric (HF), nitric (HNO₃), and hydrochloric (HCl) acid mixture for subsequent determination of elements</p> <p>Analysis EN 16192:2011 Characterisation of waste (Analysis of elutes)</p> <p>EN 13370:2005 Characterization of waste - Determination of hydrocarbon content in the range of C10 to C40 by gas chromatography</p> <p>Moreover, should there be any parameters for which the laboratory is proposing an alternative method it must ensure that the proposed method is validated against the</p>	
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		<p>3. Kindly note that once results from the sampling plan are obtained, the WMP will also have to be updated accordingly.</p> <p>4. Kindly include any waste characterization identified in the waste management plan in the sampling plan.</p> <p>5. Kindly provide a clearer copy of Appendix I. With</p>	<p>3) Noted and agreed.</p> <p>4) These will be provided in the HAZMAT, where there will be cross reference between that report and the WMP.</p> <p>5) <i>PCB Analysis on Transformer oil</i></p>	<p>above required methodology.</p> <p>Enemalta is to ensure that any waste which are intended to be landfilled, sampling and testing of such waste must fulfill the requirements of the Council Decision 2003/33/EC to properly characterize the waste and demonstrate that the waste is acceptable for disposal at a specific class of landfill site.</p> <p>Noted.</p> <p>4) Noted.</p> <p>5) Noted. Enemalta is to confirm that the in</p>	<p>5) Noted</p>
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		<p>regards to the PCB testing, kindly confirm whether the 7 congeners of PCB (28, 52, 101, 118, 138, 153 and 180) were tested. Moreover kindly provide a copy of the test result in Appendix I which are signed and dated.</p>	<p><i>report</i> is being enclosed. A covering email is also being enclosed in view that this report is not signed. Sampling Plan updated accordingly.</p>		<p>house test method used (which as per test result has been validated against IEC61619. [Insulation liquids. Contamination by polychlorinated biphenyls (PCBs). Method of determination by capillary column gas chromatography]) tested the 7 congeners as per ERA's first review. In order to ensure that the oil contains no PCB, a sample will be taken from the transformers to test it as per standard indicated by ERA. The result will be included in the HAZMAT survey,</p>		
		<p>6. With regards to the insulation material found in various structures proposed for this dismantling, kindly indicate</p>	<p>6) Segregation will be carried out, however no testing is foreseen as asbestos is deemed not to be present at the</p>		<p>6) Noted.</p>		

		<p>whether testing and segregation of the material will be carried out following dismantling of the specific structures.</p>	<p>Power Station. Precautionary asbestos testing will only be done on the calcium silicate inside the turbines, and wherever there is a doubt of its presence. As discussed during the meeting, insulation material can be visibly inspected to determine whether it is contaminated or not with oils. Should contaminated rockwool be identified, these will be segregated from the rest and disposed of as hazardous.</p>				
		<p>7. With regards to the asbestos screening,</p>	<p>7) Asbestos screen is part of the standard testing</p>		<p>7) Noted.</p>		

		<p>kindly confirm whether any other structures including auxiliary equipment are going to be tested for this parameter, and if not kindly provide reasonable justifications.</p> <p>“ It is noted that since the plant was constructed in the early nineties, asbestos testing and surveying will not be carried out.”</p> <p>“The full suite of tests is as follows:</p> <ul style="list-style-type: none"> • Metals: As, Cd, Cr, Cu, Pb, Hg, Ni, Sn, Sb, Se, V, Co, Tl, Mn, Zn; • PAH (US EPA 16)₁; • Asbestos screen;” <p>8. Kindly note that the certified results of the HAZMAT</p>	<p>regime, however this will be omitted as per justification given in the Plan. Sampling Plan updated.</p> <p>8) Noted and agreed.</p>				
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		<p>should be signed and dated. Moreover, kindly ensure that in the HAZMAT test result report, it is imperative that the analysis contains concluding remarks for every identified waste stream.</p> <p>Doc reference: HAZMAT Sampling plan – Chimney</p> <ol style="list-style-type: none"> 1. Kindly clarify whether testing will be carried out prior or following any cleaning procedures. 2. With regards to the chimney sampling, which metal structures are to be tested for the full suite of testing. 	<p>Doc reference: HAZMAT Sampling plan - Chimney</p> <ol style="list-style-type: none"> 1) Testing will be carried following cleaning where deemed necessary. Only the topmost part will be tested before. 2) At this point, and also based on works ongoing in dismantling chimney M3 at Marsa, we are uncertain there 		<p>Doc reference: HAZMAT Sampling plan - Chimney</p> <ol style="list-style-type: none"> 1) Noted. ERA is to be updated through daily progress reports during the demolition. Noted. 2) Noted however as mentioned in the sections above any necessary testing should be carried out if requested by ERA. Daily reports showing 		<p>Doc reference: HAZMAT Sampling plan - Chimney</p>
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		<p>3. Kindly clarify whether the three core samples will be taken from various heights of the chimney. Taking into consideration the height of the chimney, ERA</p>	<p>will be requirement for testing. We proposed that sampling will be carried out once demolition commences, once this is deemed necessary by the monitor. Reference is also made to the <i>Chimney metal flue pipes internal photos</i> enclosed, which were taken during an inspection carried out in 2010 and which show that the internal metal lining shows no sign of flyash deposit.</p> <p>3) The 3 core samples will be taken from the top black part of the chimney. The</p>	<p>the state of the internal lining are to be submitted to ERA during the demolition.</p> <p>Noted.</p> <p>3) Noted. Kindly submit sampling methodology prior to the initiation to ERA.</p> <p>Noted and ADI/contractor to provide prior to</p>	<p>3) Noted</p>
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		<p>deems that 3 samples on the metal structure are not considered to be representative of the entire structure.</p> <p>4. Kindly amend point 13 to indicate that the full suite of testing will be carried out on the concrete core samples. Taking into consideration the height of the chimney, ERA deems that 3 samples on the concrete are not considered to be representative of the entire structure.</p> <p>5. Kindly note that in the event that the insulation material is in contact with metal/concrete</p>	<p>rest has never been in contact with flue, and as such, it is composed of normal inert concrete.</p> <p>4) 3 samples of topmost part only. Should it be found to be hazardous, the 'black' part will be scraped off, and another 3 samples taken.</p> <p>5) Noted. Testing of insulation will only be carried out only if any part of the metal inner lining is</p>	<p>initiation of this sampling.</p> <p>4) Enemalta is to ensure that testing is carried out to the standards delineated above. Noted.</p> <p>5) Noted. ERA is to be kept updated during the demolition works. Noted.</p>	
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		<p>structures (which upon testing may result to be hazardous) is should be considered as hazardous until proven otherwise through adequate testing prior to disposal. To this effect, all insulation material is to be retained on site prior to such confirmation.</p> <p>Doc reference: Hazmat Sampling plan - Boilers</p> <ol style="list-style-type: none"> 1. Kindly provide a method statement for the cleaning method to be carried out on the boilers and ancillary equipment. 2. Kindly clarify whether quarl is 	<p>found to be perforated, thus having exposed the insulation to the flue gases. Otherwise, as witnessed in your site visit, the insulation will never come in contact with the flues.</p> <ol style="list-style-type: none"> 1) Refer to DPS-WMS 02-Boilers_rev3_June and POW, MS, RA DPS Phase 1 Demolition ver1 2) No quarl is present. Only refractory is 		<p>Doc reference: Hazmat Sampling plan – Boilers</p> <ol style="list-style-type: none"> 1) Noted. 2) Noted. 		<p>Doc reference: Hazmat Sampling plan - Boilers</p>
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		<p>present. If so indicate as to whether testing is going to be carried out on such a substance.</p> <p>3. Kindly clarify whether bottom deposit ash from the boilers is going to be tested or whether it will be regarded as hazardous similarly to flyash.</p> <p>4. Kindly note that any disposal of wash water into the sewer requires pre-approval from WSC. The test results and any other further testing which WSC may deem necessary are to be submitted prior to disposal. In the event that testing and WSC clearances may</p>	<p>present and this will be tested as per updated sampling plan</p> <p>3) Bottom ash is not going to be tested, and will be disposed of as non hazardous waste.</p> <p>4) No wash water will be disposed of in the sewer.</p>		<p>3) Noted.</p> <p>4) In reference to sampling- boilers (Boundary B), kindly note that point 15 still makes reference to disposal of wash water into the sewer. Kindly update document accordingly with an alternative disposal proposal. ADI still to update.</p>		<p>4) Noted. Information is to be provided as part of the consolidated version of the sampling plan. Noted and will be submitted.</p>
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		<p>require a period of time for processing, kindly indicate any temporary location for storage of such water.</p> <p>Doc reference: Hazmat Sampling plan – Turbines</p> <ol style="list-style-type: none"> 1. Kindly clarify the comment ‘since the presence of CFCs is only suspected of containing CFCs, the foam will be tested.’ 2. As indicated in the sampling plan, the type of CFCs and associated methodology is to be submitted to ERA prior to testing. 3. Kindly clarify whether ‘foam with 	<ol style="list-style-type: none"> 1) Point 1: There is uncertainty on whether foam contains CFC so the Sampling plan is proposing testing the foam for CFCs within the turbine enclosure. 2) Agreed and noted. 3) There are no other known structures where 		<p>Doc reference: Hazmat Sampling plan – Turbines</p> <ol style="list-style-type: none"> 1) Noted. 3) Noted. 	<p>Doc reference: Hazmat Sampling plan – Turbines</p> <p>Kindly clarify which document id being referred to.</p>
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		<p>CFCs' could also be presented in the other structures proposed for dismantling.</p> <p>Doc reference: Hazmat Sampling plan-Transformers</p> <ol style="list-style-type: none"> 1. Kindly clarify if the dielectric fluid in the transformers will be tested to determine the flash point. 2. Kindly note that any disposal of wash water into the sewer requires pre- 	<p>foam might contain CFSs.</p> <ol style="list-style-type: none"> 1) No testing is proposed as transformer oil waste will be stored in separate containers from the other oils. 2) Noted. 		<p>1) Noted, document submitted.</p> <p>Doc reference: Hazmat Sampling plan – Turbines</p> <ol style="list-style-type: none"> 1) Noted. 2) Noted. 		<p>Sorry this was a typo.</p>
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		<p>approval from WSC, and submission of the specified test results and any other further testing which WSC may deem necessary.</p> <p>Doc reference: Waste management plan</p> <p>1. With regards to table 1, kindly note that the waste log is to be submitted to ERA following dismantling of each boundary identified in the program of works as will be detailed in the IPPC permit. The waste log should be disaggregated to provide a correlation between the wastes generated from each of the specific structures (boiler 1, boiler 2</p>	<p>1) Noted and as discussed, separate Schedule 9s will be prepared for each boundary.</p>		<p>Doc reference: Waste management plan</p>		<p>Doc reference: Waste management plan</p> <p>1) Consolidated version of the WMP with ADIs update is to be submitted. Noted and will be submitted.</p>
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		<p>etc.).</p> <p>2. Kindly provide a table summarizing the various components to be dismantled from each boundary and the associated wastes which will be generated from the dismantling.</p> <p>3. With regards to point 29 in relation to the testing which to be carried out on unidentified material, it should be noted, that ERA is also to be notified prior to testing. This should also include detailed information on the parameters and the methodology for such testing.</p>	<p>2) Refer to document <i>DPS Demolition constituent material sheets</i> enclosed for breakdown of constituent materials. WMP updated and included this table as Appendix 1.</p> <p>3) Agreed.</p> <p>4) This is a</p>				<p>4) ERA's IPPC team is</p>
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		<p>4. In view that no testing of the insulation material is being proposed in the HAZMAT sampling plan, kindly indicate on what basis was it determined that the EWC code for this material is 17 06 04 (insulation materials other than those mentioned in 17 06 01 and 17 06 03), whereby the two codes specified in the description refer to hazardous insulation material. Kindly also note that insulation material arising from different components may have to be separated depending on its origin and potential contamination from other structures in which it was in</p>	<p>preliminary waste management plan and is not intended to accurately portray waste generated. We will only know what specific code to assign once works are underway, which anyway is the scope of filling in Schedule 9 with the waste logs generated by the demolition process.</p>		<p>to be notified prior to any waste disposal and updated to the WMP are to be submitted for approval. Noted.</p>		
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		<p>contact.</p> <p>5. With regards to W13 in table 1, kindly clarify whether any testing will be carried out so as to characterise the waste in view that the proposed EWC code 16 11 06 is described as (linings and refractories from non-metallurgical processes others than those mentioned in 16 11 05) in which the EWC code 16 11 05 is hazardous.</p> <p>6. Kindly note that the designation of calcium silicate as non-hazardous is subject to the test results of ACM.</p>	<p>5) This is a preliminary waste management plan and is not intended to accurately portray waste generated. We will only know what specific code to assign once works are underway, which anyway is the scope of filling in Schedule 9 with the waste logs generated by the demolition process. If there is a doubt there will be testing of the material.</p> <p>6) Precautionary ACM testing will be carried out on the calcium silicate, although no presence of asbestos is</p>	<p>5) ERA's IPPC team is to be notified prior to any waste disposal and updated to the WMP are to be submitted for approval. Noted.</p> <p>As specified in the HAZMAT sampling plan the boiler refractory will be tested to confirm its nature. Noted.</p> <p>6) Noted.</p>		
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			<p>foreseen as construction of Power Station is post 1990.</p> <p>7) This was done in error and should read 10 01 01.</p> <p>8) As shown on site during the site walk, MgO used to be dosed in low quantities into the fuel line, to avoid dust deposits on boiler tubes from solidifying. Any remaining MgO within the dosing system will be purged together with the limited volume of oil present within the system.</p>		<p>7) Noted.</p> <p>8) Kindly note that the EWC code 10 01 26 refers to wastes from cooling-water treatment, which is not deemed adequate for this type of waste. Moreover, ERA understands that the remaining MgO will be purged with the remaining HFO, thus the resultant waste should be deemed as hazardous. ADI to clarify in the coming days</p>		
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		9. Kindly include in table 1, any effluent generated from the cleaning of equipment which is proposed for disposal into the sewer, and which in line with the sampling plan will be tested for the parameters in Appendix 4 of the HAZMAT.	9) No effluent will be disposed in the sewage system.		9) Kindly propose alternative disposal route. ADI to clarify in the coming days.		
E4	✓	Noted.					