

Annex II: Feedback received following the Statutory Consultation carried out for the application of partial surrender of the Delimara Power Station carried out between 21st June – 5th July 2017

Comment received by	Feedback	ERA reply and comment	Enemalta reply
External Consultees Feedback			
Environmental Health Directorate	<p>The Environmental Health Directorate would like to highlight concerns regarding potential adverse impacts and nuisances on nearby sensitive receptors from particulate matter including dust (especially if contaminated) generation during the demolition and dismantling activities and from emissions from vehicle movements on -and off- site, from noise, vibration, runoff and hazardous waste. Adverse impacts on the coastal water should also be taken into consideration.</p> <p>All impacts should be adequately addressed by taking the necessary preventive measures and by implementation of adequate mitigation measures as proposed and highlighted in the documents forwarded (Hazardous Material Sampling Plan, The Removal of hazardous Material, Waste Management Plan and DPS Outline Decommissioning)</p>	Conditions in the Environmental permit will cater for these issues.	
Malta Competition and Consumer Affairs Authority	No feedback provided.		
Malta Resources Authority	<p>Taking note that the application is for the partial surrender of the IPPC permit in respect of Delimara Power Station, MRA has no comments to make.</p> <p>Any matters pertaining to procedures under EU ETS requirements are being addressed by MRA directly with Enemalta.</p>		
Planning Authority	No feedback provided.		
Regulatory for Energy and Water Services	The REWS has no comments in relation to the application for the partial surrender of DPS-1 plant at Delimara Power Station.		
Transport Malta	<p>Kindly advise whether any of the decommissioning operations will include the transfer of any material by sea.</p> <p>In addition, kindly advise whether the works noted will impact both the LNG terminal, taking into account, FSU alongside and FSU alongside during STS operations and lastly Delimara PS berth.</p>	Enemalta to provide feedback.	<p>No, no transfer of waste is envisaged to take place across the sea.</p> <p>The dismantling works will be confined along the piperack from the Enemalta fuel pump house to the Phase 1 plant. The dismantling works will be carried out in the areas / boundaries delineated on drawing DPS-XZ-187. As such, there will be no impact to the FSU terminal or the DPS Quay terminal under normal conditions or during an STS.</p>
Civil Protection Department	<p>The contracted is responsible to observe all required safety measures related to the works at all times, however we have the following comments that we wish to bring forward.</p> <ol style="list-style-type: none"> 1. Since we have a fire station with personnel situated at the power station we suggest that our personnel are briefed on a daily basis as regards the works of the day and related hazards and immediate actions to be taken in the event of an accident or incident. 2. During certain hot works equipment for fire extinguishing purposes such as hoses/ foam equipment and fire extinguishers should be laid out and prepared in readiness. 	Enemalta to provide feedback	<ol style="list-style-type: none"> 1. Agreed and will ensure there is constant communication during works. CPD personnel will also be invited for toolbox talks conducted on site. 2. Noted and agreed. That has already been incorporated in the risk assessments. Copies of the risk assessments can

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	<p>3. Where and when required the responsible company should assign personnel to standby as fire watchers.</p>		<p>be forwarded to CPD for their information and feedback. All hot works will be also covered by a Hot Work Permit. CPD may also be called in prior to major hot works so as to prepare firefighting measures in the vicinity of these works, and be on standby to take action in case of a fire.</p> <p>3. Noted and agreed. That has already been incorporated in the risk assessment. Copies of the risk assessments can be forwarded to CPD for their information and feedback.</p>
Water Services Corporation	<p>From our end the most important aspects are the disposal of any liquid wastes which are understood to be made up of the following:</p> <ul style="list-style-type: none"> * Waste Oils * Waste Oil sludges * Boiler washings * Air abatement measures for chimney using sprayed water <p>Requirements imposed by WSC:</p> <p>1. It is important that sites earmarked for transfer of oils (from transformers, steam turbines, etc) using vacuum suction bowsters are clear from any manholes or ingress points to the sewer network. If this is not possible it would be necessary that the site is bunded temporarily using oil adsorbent booms. Under no circumstances will oils/fuels and/or any washings of any tanks be allowed to be discharged into sewer. The same applies for the dismantling of the pipe networks.</p> <p>2. We understand that boilers will be washed and these washings will be left to evaporate. It is important that such washings are stored in bunded tanks and that these are not discharged into the waste water network.</p> <p>3. If water is sprayed during the dismantling of the chimney or any other structures as part of air abatement measures, this water will not be allowed to be discharged to sewer prior Enemalta obtains a public sewer discharge permit for this particular waste water.</p> <p>4. Overall, the limits and provisions stipulated by LN 139 of 2002 as amended by LN 378 of 2005 must be observed at all times.</p>	<p>Enemalta to note feedback provided and ensure that all conditions are abided with.</p>	<p>1. Noted and agreed.</p> <p>2. Noted and agreed. These will be stored in designated bunded temporary waste management site</p> <p>3. Noted and agreed. However, as explained in the method statements, a fine mist will be sprayed which will be dry up immediately. Hence there will be no waste water generated from dust abatement.</p> <p>4. Noted.</p>
OHSA	<p>In the execution of these works the applicant shall abide by all relevant OHS legislation and in particular:</p> <p>1. In the case of applications having an element of construction activities falling within the scope of LN 281 / 2004:</p> <p>(a) The applicant shall:</p> <p>(i) Appoint a Project Supervisor for the Design Stage and a Project Supervisor for the Construction Stage and any such appointment shall be terminated, changed or renewed as necessary. The same person may be appointed to act as project supervisor for both the design and construction stage, if that person is competent to undertake the duties involved and</p> <p>(ii) Keep a health and safety file prepared by the Project Supervisor for the Design Stage.</p> <p>(b) When the construction works related to this application are scheduled to last longer than thirty working days and on which more than twenty workers are occupied simultaneously, or on which the volume of work is scheduled to exceed five hundred person-days, the Project</p>	<p>Noted. Requirements will be included as permit conditions.</p> <p>Enemalta kindly note OHSA requirements to ensure that these are in place as per the timeframes indicated.</p> <p>Document OHSA HFO pipework dismantling risk assessment submitted on</p>	<p>1(a)(i): A PSCS has already been appointed.</p> <p>1(a)(ii): Noted.</p> <p>1(b): A CNF is being prepared and will be submitted by end of July.</p>

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	<p>Supervisor for the Design Stage shall communicate a prior notice to the Occupational Health and Safety Authority (OHSA) at least four calendar weeks before work starts.</p> <p>(c) The Project Supervisor for the Design Stage shall draw up a health and safety plan which sets out the occupational health and safety rules applicable to the construction activities concerned, outlining the measures to ensure cooperation between different contractors and shall also include specific measures concerning occupational risks that may be present at this site.</p> <p>2. All work equipment conforms to the requirements of the Work Equipment (Minimum Safety and Health Requirements) Regulations, L.N. 293/2016.</p>	3/07/17 shall be forwarded to the COMAH Competent Authority.	<p>1(c): A health and safety plan has been prepared and is currently being finalised.</p> <p>2: Noted</p>
COMAH	<p>Feedback received from OHSA and ERA as part of COMAH CA</p> <p>Since the HFO tanks are going to remain, there is no need to review the SR. if the works are going to impact the evacuation routes or access routes for emergency vehicles, then the internal emergency plan and coordinated emergency plan have to be reviewed. Any other works which could interfere with the safe operation of other plant should be coordinated between the operators at the Delimara site.</p> <p>Feedback received from CPD as part of COMAH CA</p> <p>Since CPD have a dedicated fire team on duty constantly at Delimara power station these should be under the sound knowledge of the works going on daily basis so as to be more prepared for immediate intervention, rather than just being given a document and presented with a works schedule for several months.</p> <p>They will not need to know the technical aspects but be able to pre-plan any intervention actions and lay related equipment in advance if and when needed.</p>	<p>Document OHSA HFO pipework dismantling risk assessment submitted on 3/07/17 has been forwarded to the COMAH Competent Authority on 5/7/17.</p> <p>Enemalta is to provide feedback with respect to COMAH's reply regarding the internal emergency plan and coordinated emergency plan especially in the light of the restricted assess outlined in the latest submissions.</p>	Should works impact evacuation/access routes, an addendum will be included to the Enemalta plan, and agreed with the other operators to be included in the coordinated emergency plan. However, such impacts are envisaged to be minimal.
Internal Consultees Feedback			
Environmental Assessment Unit	In view of the fact that the decommissioning of DPS1 is strictly an operational matter which will be covered by the IPPC process, no additional comments from an EIA point of view are required.		
Biodiversity & Water Unit	No feedback received.		
Air & Waste Air Quality Team	No feedback received.		
Air & Waste Waste Management Team	Consultation regarding the waste management plan and the HAZMAT plan was carried out prior to the official start of the regulatory consultation.		
Compliance & Enforcement	No further comments		
Permitting Unit Waste Permitting	<p>Reference to the new Act should be made in the PW, MS, Ra, DPS phase 1 Demolition.</p> <p>Regarding</p> <ul style="list-style-type: none"> Waste Broker's Permit number GBR 0699/09- the version provided is expired, however this has now been renewed; Waste Carrier's Permit number GBR 00026/2013 – this is valid for the following codes: 	Enemalta to ensure reference to the latest legislation is included in the aforementioned document.	Document will be revised and submitted by PTMATIC in POW, MS, RA DPS Phase 1 Demolition ver4.

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	<div>08 03 12, 17 06 01, 17 06 05, 07 01 01, 08 01 13, 08 01 11, 16 10 03, 15 02 02, 20 01 19, 20 01 27, 18 01 08, 18 01 06, 06 01 06, 07 05 01, 07 05 03, 07 05 04, 07 05 13, 07 07 04, 16 06 02, 16 06 03, 20 01 33, 16 05 06</div> <div><ul style="list-style-type: none">Notification numbers MT 16/000025- still validNotification numbers MT 16/000028 – this has been suspended due to non-compliance. Applicant has however obtained MT 17/000019 enabling him to export the following:</div> <table><tr><td>Fly Ashes from combustion process or Residues from scrubbing treatment, Filter cake from Gas Treatment, Boiler Washings</td><td>10 01 18*, 19 01 05*, 19 01 15*, 10 01 04*</td></tr></table>		Fly Ashes from combustion process or Residues from scrubbing treatment, Filter cake from Gas Treatment, Boiler Washings	10 01 18*, 19 01 05*, 19 01 15*, 10 01 04*		
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