

Form A

Section	Duly made?	ERA Comments 28 June 2017	Enemalta Comments	ERA Comments 11 July 2017
A1.1	✓	Noted		
A1.2	✓	Noted		
A1.3	✓	Noted		
A1.4	✘	Kindly provide a valid GHG permit.	Correspondence with MRA on the update of the GHG permit being enclosed with the application.	Noted
A2.1	✓	Noted		
A2.2	✓	Noted		
A3.1	✓	Noted		
A3.5	✓	Noted		
A3.6	✓	Noted		

Form E

Section	Duly made?	ERA Comments 16 May 2017	Enemalta Comments	ERA Comments 11 July 2017
E1.1	✓	Noted		
E2.1	✓	Doc reference: MPS Demolition site in August_a-Layout2_1705 Noted		
E2.2	✓	Doc reference: 20170608_Explanatory document Noted		

E3.1	✓	<p>Doc reference: MPS Demolition site in August_a-Layout2_1705</p> <p>Noted.</p> <p>Doc reference: MPS Demolition material for Milestones_1705</p> <p>Noted.</p> <p>Doc reference: RP083011 RVA300 MPS Full Decommissioning Plan 001</p> <ol style="list-style-type: none"> 1. Updates of the 2011 full decommissioning plan together with the required land & ground water monitoring will be requested as par of the IPPC permit. 2. With reference to page 3 in which is it stated that ‘The investigation findings have indicated that there is not significant contamination of the land resulting from present activities. However, due to the nature of the natural geology any potential contamination is likely to be confined to its source (sumps pits and culvert channels). Oil staining and minor 	<p>Doc reference: RP083011 RVA300 MPS Full Decommissioning Plan 001</p> <ol style="list-style-type: none"> 1. Noted 2. Sumps and pits will not be dismantled as part of this application, since all dismantling works will be up to 1 metre from slab level. 	<p>Doc reference: RP083011 RVA300 MPS Full Decommissioning Plan 001</p> <ol style="list-style-type: none"> 2. Provisions for infilling for any sumps and pits will be subject to permit conditions.
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		<p>spills have been noted on the hardstanding and around plant'. Kindly clarify whether any remedial action is being considered in this regard.</p> <p>3. With reference to point made in which it is mentioned that lead and benzo(a)pyrene are above their respective Generic Assessment Criteria (GAC), kindly clarify what actions are being taken to reduce the risk of further contamination during the dismantling operations.</p> <p>4. Kindly clarify as to whether the discharge outlets and seawater culverts have been blocked?</p> <p>5. Kindly clarify whether the quay structure will remain.</p>	<p>3. Contamination risks were avoided by not disturbing the contaminated ground, or compromising the quality of the hardstanding. Containment measures applied served to mitigate against the possibility of further contamination at the points where GAC levels were exceeded.</p> <p>4. Entry to the culverts were blocked.</p> <p>5. Yes.</p>	<p>3. Further land and groundwater testing will be required as part of the permit.</p> <p>4. Noted.</p> <p>5. Noted.</p>
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E.3.2	x	<p>Doc reference: MS- 20170410- Chimney 02-R02</p> <p>1) With reference to the statement: ‘Hazmat submitted at ERA clearly indicate that the materials compromising the chimney concrete & brick lining are to be considered as non-hazardous.’ – Kindly note that no results with respect to chimney 2 in the Hazmat report was submitted.</p> <p>2) In reference to the following, ‘detail of the containment zones is outlined in a plan attached to this MS (attached in presentation). Kindly note plan was not submitted.</p> <p>3) Kindly clarify the statement ‘It is being construed that the insulation will be removed from the containment area situated at the bottom of the chimney should this seep to the ground area.’</p> <p>4) Enemalta to confirm whether the ‘precipitator and surrounding equipment’ referenced in the Hazmat has been removed already or whether it will be considered as part of this application.</p>	<p>1. This will be submitted prior to the issue of the IPPC permit</p> <p>2. This will be submitted prior to the issue of the IPPC permit</p> <p>3. To be clarified prior to the issue of the IPPC permit</p> <p>4. That has already been removed.</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p> <p>4. Noted</p>
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		<p>5) With regards to the utilization of the dust suppression abatement indicated, kindly specify how runoff from the wetting process will be managed on site. Kindly indicate the containment zones on an adequate plan.</p> <p>6) 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>Doc reference: MS- 20170126- Chimney 04-R04</p> <p>1) Enemalta to confirm whether further testing will be carried with reference to the bricks after the structure has been laid to fall to the ground.</p> <p>2) Kindly clarify whether road access will be limited during the demolition.</p> <p>3) Kindly clarify the source and location in which the hazardous MPS 19 ‘Green liquid from chimney’ was found. Kindly also confirm the disposal method of this</p>	<p>5. To be clarified prior to the issue of the IPPC permit</p> <p>6. Noted.</p> <p>1. Reply to be submitted prior to the issue of the IPPC permit.</p> <p>2. No external roads will be affected by the demolition.</p> <p>3. To be clarified prior to the issue of the IPPC permit</p>	<p>5. Noted</p> <p>6. Noted</p> <p>Doc reference: MS- 20170126- Chimney 04-R04</p> <p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p>
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		<p>liquid.</p> <p>4) Kindly clarify which are other chimney 4 constituents will be tested.</p> <p>Doc reference: Method Statements Tanks</p> <p>Doc reference: MS-20160726-TANK 03-R01 Doc reference: MS-20160726-TANK 04-R01 Doc reference: MS-20160726- TANK 05- R01</p> <p>1) With reference to the comment ‘All air exits to the atmosphere shall be filtered to prevent dust emissions to the ambient atmosphere.’ Kindly note dust monitoring can be omitted during the tank dismantling.</p> <p>2) Given that there are different works involved in the dismantling of the HFO tanks, kindly clarify during which activity shall ‘monitoring for VOCs and SVOCs in tandem for the duration of one normal day’ occur, will it be carried out consistently throughout or during</p>	<p>4. To be clarified prior to the issue of the IPPC permit</p> <p>1. Noted</p> <p>2. VOC monitoring will be conducted during the cleaning activity of the tanks.</p>	<p>4. Noted</p> <p>Doc reference: Method Statements Tanks</p> <p>Doc reference: MS-20160726-TANK 03-R01 Doc reference: MS-20160726-TANK 04-R01 Doc reference: MS-20160726-TANK 05- R01</p> <p>2. Noted. Enemalta to confirm with OHSa whether these provisions are adequate.</p>
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		<p>particular day/activity of the dismantling.</p> <p>3) Kindly clarify the location of VOC and dust monitoring units which will be installed during the work execution.</p> <p>4) Kindly note that any VOC testing must also take into consideration the level of odours present, if any, within the tank to allow for mitigation measures to be taken, if necessary.</p> <p>5) Kindly ensure that once all of the sludge and dried sludge residue from the inside of the tank, a certificate to declare the tank decontaminated, odour free and ready for dismantling shall be required.</p> <p>6) After the full removal of the tank, kindly clarify whether cleaning under the area of the tank shall be carried out.</p>	<p>3. Location of monitor (VOC) is adjacent to tank entrance (inside bund)</p> <p>4. Noted.</p> <p>5. Noted.</p> <p>6. Noted. This will depend on the conditions of the area once the tank bottom is removed.</p>	<p>3. Noted</p> <p>6. Noted. Kindly ensure that photos of the dismantling 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 dismantling works. This requirement will be included as a permit condition.</p>
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		<p>7) Kindly clarify the status of the stripping works on Tank 3 and Tank 4 which were ongoing in April 2017.</p> <p>8) Under the section of dust and volatile solvents. 100mg/me should read 100mg/ m³.</p> <p>Doc reference: Sludge Tank to be submitted.</p> <p>1. Kindly note works on the sludge tank shall not start until submitted and vetted by ERA.</p> <p>2. Kindly ensure VOC testing will be carried out during the dismantling of the sludge tank.</p>	<p>7. In April 2017, works on Tank 3 and Tank 4 consisted only of cleaning the tank from oil and sludge residue. The only dismantling works were the actual opening of the tank sides to provide access to the workers.</p> <p>8. Method statement to be updated prior to issue of IPPC permit.</p> <p>1. Sludge Tank method statement is being submitted along with the updated application.</p> <p>2. Noted.</p>	<p>7. Noted.</p> <p>8. Noted.</p> <p>1. Noted.</p>
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		<p>Doc reference: MS-20170410-HFO pipework-R01</p> <ol style="list-style-type: none"> 1) With reference to the submitted method statement there is no designated Area/Zone. Kindly specify the specific location. 2) Kindly note that no timeframes in the submitted Method Statement are disclosed. 3) Kindly clarify how the aluminium insulation from the pipework will be removed. 4) Kindly clarify which EWC code the cleaned HFO pipework will be assigned to. <p>Doc reference: MS-20161108- TH 08- CONCRETE_Adi_ens</p> <ol style="list-style-type: none"> 1) Kindly specify which ‘control measures described in the risk assessment for zone 5 shall apply.’ Kindly note that the method statement must not cross-reference documents not included in the application. 	<ol style="list-style-type: none"> 1. This will be submitted prior to the issue of the IPPC permit 2. Method statement will be updated prior to the issue of the IPPC permit 3. This will be clarified prior to the issue of the IPPC permit 4. This will be clarified prior to the issue of the IPPC permit <ol style="list-style-type: none"> 1. This will be clarified prior to the issue of the IPPC permit 	<p>Doc reference: MS-20170410-HFO pipework-R01</p> <ol style="list-style-type: none"> 1. Noted 2. Noted 3. Noted 4. Noted <ol style="list-style-type: none"> 1. Noted
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		<p>2) Kindly clarify as to whether unit 8 turbine hall will be demolished after the scarifying treatment.</p> <p>Doc reference: MS-20170323- switch gears_ R02</p> <p>1) Kindly confirm whether SF₆ is present within the switchgear.</p> <p>Doc reference: MS-20170601- Transformers_Part1_R02 Removal and relocation only of transformers</p> <p>1) In reference to the statement ‘The <i>upper part of the transformer will not be drained since oil is thick. This part will be hot cut at a later stage and carted off site as waste oil containing material.</i>’ Kindly ensure that such material is disposed of as hazardous unless completely decontaminated given that the residual oil is hazardous.</p>	<p>2. This will be clarified prior to the issue of the IPPC permit</p> <p>1. Yes but it is being removed by certified personnel from Siemens as the switchgear will be relocated in DPS for re-use.</p> <p>1. Noted.</p>	<p>2. Noted</p> <p>1. Noted</p>
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		<p>Doc reference: MS-20170608-Transformers_Part2_R01 Cleaning, Decontamination, Dismantling and Carting away of Transformers</p> <p>1) With reference to the statement that ‘all works will be carried out within a bunded area with a sump, thus in the occurrence of minor oil spills, these can be easily pumped out of the sump using mechanical pump.’ kindly specify which bunded area.</p> <p>Doc reference: MS-20170523-Turbine Hall Blocks 3-7_r1</p> <p>1) Kindly ensure testing result of the scarifying treatment to the turbine hall is to be provided to ERA prior to demolition. 2) Kindly ensure that testing of the pits is carried out prior to infilling.</p>	<p>1. To be clarified prior to the issue of the IPPC permit.</p> <p>1. Noted</p> <p>2. Feedback on this will be provided prior to the issue of the IPPC permit.</p>	<p>Doc reference: MS-20170608-Transformers_Part2_R01 Cleaning, Decontamination, Dismantling and Carting away of Transformers</p> <p>1. Noted</p> <p>Doc reference: MS-20170523-Turbine Hall Blocks 3-7_r1</p> <p>2. Noted</p>
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	<p>Doc reference: MS-20170423- EVAPORATORS</p> <p>1) Kindly confirm whether any refrigerant gas will be degassed prior to the works.</p> <p>Doc reference: WMP for IPPC Application of 1 August_May 2017</p>	<p>1. All air conditioners' gas is being pumped down to the compressors (found in the outdoor units) by Enemalta's personnel. From then onwards, Bezzina is taking care to dispose of the outdoor units. The plan is to dispose of the units filled with R22 to an overseas permitted facility. Details of this facility will be provided prior to the issue of the IPPC permit.</p>	<p>Doc reference: MS-20170423—EVAPORATORS</p> <p>1. Noted.</p> <p>Doc reference: WMP for IPPC Application of 1 August_May 2017</p>
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		<p>1. Kindly clarify point 2.8 “The rest of the equipment has already been dismantled and decommissioning and has been included in a separate WMP.”</p> <p>Kindly note that the WMP must not cross-reference documents not included in the application. If a reference is included kindly indicate which version.</p> <p>2. Kindly ensure that any legislation that is referenced in the WMP has been updated accordingly.</p> <p>3. Kindly note that the sample tested on the presence or absence of ACM with calcium silicate conflicts with a previous report submitted by PTMatic which shows that ACM was incorporated with the calcium silicate. Kindly confirm.</p>	<p>1. Cross reference to be removed.</p> <p>2. Legislation to be updated.</p> <p>3. Rather than inside the calcium silicate the ACM was located in remnants of gaskets around bolting plates. The bulk of the sample was not ACM. We deduce that this was from a past removal job which left traces of ACM. WMP to be updated with this information prior to the issue of the IPPC permit.</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p>
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	<p>4. 'Asbestos testing and surveying is reported upon in a separate document and falls outside the scope of this WMP.' Kindly reference the HAZMAT or omit completely.</p> <p>Doc reference: HAZMAT report for IPPC of 1 August_May 2017</p> <p>1. Kindly ensure that the HAZMAT sampling plan added to the IPPC application is submitted. Moreover the sampling regime must be updated any testing carried out hereafter.</p> <p>2. With regards to point 1.3 kindly note that any reference in the Hazmat should be limited those structures which are within the scope of the IPPC application.</p> <p>3. Kindly clarify the statement 'concrete structure in the turbine hall of boiler 8- 1 sample of lightly stained concrete + another 3 samples of heavily stained concrete from the surface and from 3cm. Additionally 4 core samples were taken from turbine hall 8 (2 samples) and turbines 4 and 5.'</p> <p>Kindly clarify to which sampling code do the</p>	<p>4. WMP to be updated prior to the issue of the IPPC permit.</p> <p>1. Cross reference to Sampling plan has been removed.</p> <p>2. HAZMAT to be updated prior to the issue of the IPPC permit to omit cross references.</p> <p>3. To be clarified prior to the issue of the IPPC permit.</p>	<p>4. Noted</p> <p>Doc reference: HAZMAT report for IPPC of 1 August_May 2017</p> <p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p>
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		<p>above refer to.</p> <ol style="list-style-type: none"> 4. With reference to table 4.4 hazardous material sampling plan. Kindly remove testing which was done outside the scope of the IPPC. 5. Kindly clarify whether the list of equipment highlighted in point 4.12 will be removed as part of the current IPPC application. 6. Kindly clarify what is the distinction between the various samples taken and tested on the turbine 8 Hall concrete. Moreover kindly clarify when the April 2017 result will be available. 7. Kindly indicate the sampling points which are going to be tested on the metal sheet of Chimney 2. 8. Kindly amend point 4.18 to indicate Turbine 3-7 as is required in IPPC application. 9. Kindly indicate when the testing of the concrete from turbine Hall will be carried out and submitted. Kindly also confirm whether the full suite of testing will be carried out. 	<ol style="list-style-type: none"> 4. HAZMAT to be updated prior to the issue of the IPPC permit. 5. To be clarified prior to the issue of the IPPC permit. 6. To be clarified prior to the issue of the IPPC permit. 7. To be clarified prior to the issue of the IPPC permit. 8. HAZMAT to be updated prior to the issue of the IPPC permit. 9. HAZMAT to be updated prior to the 	<p>4. Regarding points 4-9; Noted.</p>
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		<p>General Comments:</p> <ol style="list-style-type: none"> 1. For each of the sampling tests on page 234 kindly provide a concluding remark and the suggested waste disposal location. 2. Kindly remove duplicate results from the Appendix 1. <p>Hazmat results: Transformers</p> <table border="1" data-bbox="450 906 1137 1329"> <thead> <tr> <th>Sampling code:</th> <th>Laboratory Code</th> <th>Location of sample</th> </tr> </thead> <tbody> <tr> <td>MPS01</td> <td>584632 001</td> <td>Transformer 8 (from area 5)</td> </tr> <tr> <td>MPS03</td> <td>584632 003</td> <td>Transformers Tx1 (from area 3)</td> </tr> <tr> <td>MPS05</td> <td>584632 005</td> <td>Transformer Tx5 (from area 4)</td> </tr> <tr> <td>MPS08</td> <td>584632 008</td> <td>Transformer</td> </tr> </tbody> </table>	Sampling code:	Laboratory Code	Location of sample	MPS01	584632 001	Transformer 8 (from area 5)	MPS03	584632 003	Transformers Tx1 (from area 3)	MPS05	584632 005	Transformer Tx5 (from area 4)	MPS08	584632 008	Transformer	<p>issue of the IPPC permit.</p> <ol style="list-style-type: none"> 1. HAZMAT to be updated prior to the issue of the IPPC permit. 2. HAZMAT to be updated prior to the issue of the IPPC permit. 	<ol style="list-style-type: none"> 1. Noted 2. Noted <p>Noted with respect to the pending clarifications on the HAZMAT testing & results of the various structures.</p>
Sampling code:	Laboratory Code	Location of sample																	
MPS01	584632 001	Transformer 8 (from area 5)																	
MPS03	584632 003	Transformers Tx1 (from area 3)																	
MPS05	584632 005	Transformer Tx5 (from area 4)																	
MPS08	584632 008	Transformer																	

		Tx7A (from area 6)		
MPS23	635594 001	Transformer oil from under control room		
<p>1) Kindly clarify why the laboratory code 584632 002,4,6,7 are collated given that they represent different substrates.</p> <p>2) Kindly provide a concluding remark and a final disposal location</p> <p>Hazmat results: Switchgear oil</p>				
Sampling code:	Laboratory Code	Location of sample		
MPS 24 MPS 25 MPS 26	584632 001	Switchgear oil I KV Brush S/G, Switchgear oil 33KV Gwarator No3, Switchgear oil 3KV Brush S/G respectively		
<p>1. Kindly provide a concluding remark and a final disposal location</p>				<p>1. To be clarified prior to the issue of the IPPC permit.</p> <p>2. HAZMAT to be updated prior to the issue of the IPPC permit.</p>

Hazmat results: Boilers

Sampling code:	Laboratory Code	Location of sample
MPS17	607591 001	White material from boiler 2
MPS04	584632 004	Boiler 4 quarl
MPS06	584632 006	Boiler 5 bottom ash
MPS09	597500 001	Concrete Sample (2 places) in Boiler 8
MPS10	597225 001	Bottom Ash from boiler 6

1. Kindly clarify why the laboratory code 584632 002,4,6,7 are collated given that they represent different substrate.
2. Kindly provide a concluding remark and a final disposal location.

Hazmat results: Chimney 3

Sampling code:	Laboratory Code	Location of sample
MPS07	584632 007	Chimney 3

1. HAZMAT to be updated prior to the issue of the IPPC permit.

1. To be clarified prior to the issue of the IPPC permit.
2. HAZMAT to be updated prior to the issue of the IPPC permit.

		bricks																		
	<p>1. Kindly provide a concluding remark and a final disposal location.</p> <p>Hazmat results: Chimney 4</p> <table border="1"> <thead> <tr> <th>Sampling code:</th> <th>Laboratory Code</th> <th>Location of sample</th> </tr> </thead> <tbody> <tr> <td>MPS 02</td> <td>584632 002</td> <td>Chimney 4 bricks</td> </tr> <tr> <td>MPS 19</td> <td>610972 001</td> <td>Green liquid from chimney 4</td> </tr> <tr> <td>MPS 20</td> <td>626897 001 620904 001</td> <td>Sample of bricks from chimney 4 during part demolition</td> </tr> <tr> <td>MPS 21</td> <td>626897 002 620904 002</td> <td>Sample of bricks from chimney 4 during part demolition</td> </tr> </tbody> </table> <p>1. Kindly remove duplicate entries for the results of MPS 19.</p> <p>2. Kindly clarify the difference in samples</p>			Sampling code:	Laboratory Code	Location of sample	MPS 02	584632 002	Chimney 4 bricks	MPS 19	610972 001	Green liquid from chimney 4	MPS 20	626897 001 620904 001	Sample of bricks from chimney 4 during part demolition	MPS 21	626897 002 620904 002	Sample of bricks from chimney 4 during part demolition	<p>1. HAZMAT to be updated prior to the issue of the IPPC permit.</p>	
Sampling code:	Laboratory Code	Location of sample																		
MPS 02	584632 002	Chimney 4 bricks																		
MPS 19	610972 001	Green liquid from chimney 4																		
MPS 20	626897 001 620904 001	Sample of bricks from chimney 4 during part demolition																		
MPS 21	626897 002 620904 002	Sample of bricks from chimney 4 during part demolition																		
	<p>1. Kindly remove duplicate entries for the results of MPS 19.</p> <p>2. Kindly clarify the difference in samples</p>			<p>1. HAZMAT to be updated prior to the</p>																

between MPS 20 and MPS 21.

2. Kindly provide a concluding remark and a final disposal location.

Hazmat results: Turbine Hall Unit 8

Sampling code:	Laboratory Code	Location of sample
MPS 11 A-13B	605011 001-005	Surface and sub-surface samples of concrete from turbine hall 8
MPS14A, MPS14B	605011 006-007	Concrete plinth outside turbine hall- one surface, one sub surface sample
MPS 22	626637001	Concrete turbine hall 8 after scraping stained concrete

1. Kindly note there is a mistake 605011 001, which according to the table (pg 234) is surface and sub-surface

issue of the IPPC permit.

2. To be clarified prior to the issue of the IPPC permit.
3. HAZMAT to be updated prior to the issue of the IPPC permit.

1. HAZMAT to be

		<p>samples of concrete from turbine hall 8.</p> <ol style="list-style-type: none"> Kindly clarify to which depth was the concrete in turbine hall 8 scraped to render it non-hazardous as per MPS 22. Kindly provide a concluding remark and a final disposal location. <p>Hazmat results: Evaporator</p> <table border="1"> <thead> <tr> <th>Sampling code:</th> <th>Laboratory Code</th> <th>Location of sample</th> </tr> </thead> <tbody> <tr> <td>MPS15</td> <td>605856 001</td> <td>Mud under the evaporator (zone 5 near boiler 8)</td> </tr> </tbody> </table> <ol style="list-style-type: none"> (MPS 15) 605856 0001 deemed as hazardous mud under the evaporator. 	Sampling code:	Laboratory Code	Location of sample	MPS15	605856 001	Mud under the evaporator (zone 5 near boiler 8)	<p>updated prior to the issue of the IPPC permit.</p> <ol style="list-style-type: none"> To be clarified prior to the issue of the IPPC permit. HAZMAT to be updated prior to the issue of the IPPC permit. 	
Sampling code:	Laboratory Code	Location of sample								
MPS15	605856 001	Mud under the evaporator (zone 5 near boiler 8)								
E4	*	Kindly provide official letter	Official letter being enclosed to the application.	Noted						