

Environmental Permit

Environment Protection Act (CAP. 549)

Permit number
EP 0044/17

Approved Document
EP 0044/17/DOC1

The Environment and Resources Authority (hereinafter the Authority; the Competent Authority or ERA) in exercise of its powers under the Environment Protection Act (CAP. 549) hereby authorises:

Mr Kevin Chircop o.b.o. **Enemed Co. Ltd** (hereinafter “the Permit Holder”),
Company number: **C 66404**

Of / Whose Registered Office (or principal place of business) is at

**31st March 1979 Installation,
Sacred Heart Promenade
Birzebbugia
BBG1604**

to operate a fuel terminal as per conditions and limitations stipulated in this permit at:

**Enemed Fuel Filling Depot
Has-Saptan, Off Vjal I-Avjazzjoni
Has-Saptan
Ghaxaq**

This permit is valid for four (4) years from the granted date below. An application for renewal of this permit is to be submitted at least six (6) months prior to expiry of this permit.

Signed

Date

Prof. Victor Axiak Chairman	Permit Granted: 16 / 11 /2020
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Authorised to sign on behalf of the Competent Authority

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Conditions

1. General

The Permitted Installation shall, subject to the conditions of this Permit, be managed, controlled and operated as described in the Environmental Permit Application, or as otherwise previously agreed in writing by the Authority.

1.1. Status Log

Detail	Date
Original EP application submitted	27 th April 2017
Submission of consolidated application	22nd June 2020
Permit determination by ERA Board	9 th October 2020

1.2. Permitted Activities

1.2.1. The Permit Holder is authorised to carry out the activities and the associated activities specified in Table 1.2.1.

Activity	Description of specified activity	Limits of specified activity
Storage, supply and distribution of Fuels including dispensing to road tankers for wholesale.	<p>Loading, storage and transfer of Diesel, Gasoil, Gasoline, Octane Booster, Hydrogenated vegetable Oil Fuel and Kerosene within the underground tanks.</p> <p>Loading of fuel into bottom-loading road tankers for the distribution to service stations and other storage facilities.</p>	From receipt of fuels from the adjacent Underground Storage facility at Has-Saptan or by road tankers to the filling of road tankers.
Associated activity of utilities	<p>Repair and maintenance of fuel pipelines and storage tanks.</p> <p>One oil-water interceptor and sump for collection of bund water and tank draining,</p> <p>Diesel fire-pump.</p> <p>Handling, storage and material usage for one</p>	<p>From maintenance/repair activity to storage and appropriate recovery/ disposal of any waste generated on site.</p> <p>From collection of oily water in sump, to transfer and discharge to land from the Class 1 EN 858 oil water separator.</p> <p>From filling of the water storage tank, receipt, storage and filling with diesel maintenance and use of the associated fire pipe system.</p> <p>From receipt, storage and handling of fuel to delivery of energy.</p>

	<p>backup diesel generator to produce electricity.</p> <p>Application of additives and markers as required by Malta customs.</p> <p>The storage of diesel in a tank for the refuelling of road takers</p> <p>Filling of underground storage tank headspace with Nitrogen gas.</p>	<p>From the receipt of the additives and markers from customs to the application in the quantities required by maltese law.</p> <p>From the filling of the diesel tank to refuelling of Road tankers</p> <p>From the pumping of Nitrogen gas, to the displacement of fuel fumes, from within the headspace of the underground storage tanks.</p>
Associated activity of storage, treatment and disposal/recycling of waste materials generated on site.	Handling, storage and treatment of wastes from installation prior to disposal.	From generation of waste to removal from site.

1.3. Site

- 1.3.1. The activities authorised under Condition 1.2.1 shall not extend beyond the Site, as shown on the Site Plan in Schedule 4 to this Permit.

1.4. General Conditions

- 1.4.1. The conditions and obligations of this permit are without prejudice to any other regulation, code of practice, conditions or requirements requested by other Authorities or entities, including but not limited to the Planning Authority, the Occupational Health and Safety Authority, Transport Malta and the Regulator for Energy and Water Services (REWS).
- 1.4.2. This permit is granted saving third party rights. The Permit Holder is not excused from obtaining any other permission required by law.
- 1.4.3. A copy of this permit shall be available at all times on site at the permitted facility, including any Variation Notices or amendments to it.
- 1.4.4. All persons have a duty of care to protect the environment. The Permit Holder shall become familiar with his legal obligations and good environmental practice.
- 1.4.5. The site shall be maintained in a tidy condition, free from litter and waste (whether arising from own activities or external sources).
- 1.4.6. The site must be well secured at all times.
- 1.4.7. The Permit Holder shall maintain a register of third party complaints. The register shall record the details of complainant(s) if available, the date, source and nature of the complaint and the corrective action undertaken, where such action proves necessary.

- 1.4.8. All plant, equipment and technical means used in operating the Permitted Installation shall be maintained in good operating condition and without causing polluting emissions, leaks and spillages. The Permit Holder shall keep maintenance records as per Section 4.
- 1.4.9. The Permitted Installation shall be managed, controlled, supervised and operated by staff that are aware of the importance of environmental protection and suitably trained on the requirements of this Permit. All staff shall be provided with adequate training and written operating instructions to enable them to effectively carry out their duties. Such training shall be recorded and maintained.
- 1.4.10. The Authority may request additional monitoring and/or review of operational practices and/or commission audits on the installation as deemed necessary to address any circumstances that may affect the quality of the surrounding environment. Any required monitoring and audits shall be carried out at the expense of the Permit Holder.
- 1.4.11. Without prejudice to Condition 1.4.10, the Authority may take any action deemed necessary including but not limited to the suspension of any activity/operation until investigations are concluded.
- 1.4.12. The permit is valid for a period of four (4) years from the date of the granting. The Permit Holder is able to renew the permit upon application with the Authority expressing his/her intention at least six (6) months prior to the expiry of this permit. The permit will be considered renewed once the official renewed permit is granted by the Authority.
- 1.4.13. The permit is granted against a Bank Guarantee of €14,100 which shall be renewed annually. This guarantee will have to be maintained throughout the validity of the permit. Following renewal and/or variations to this permit, the Authority may require amendments to the Bank Guarantee.
- 1.4.14. The Bank Guarantee shall remain in place for the duration of the validity of this permit and shall only be released upon confirmation of full compliance with the permit conditions by the Authority.
- 1.4.15. The Authority may take part or all of the bank guarantee if the Permit Holder fails to take the necessary action, in cases of non-compliance with these permit conditions, the Act or any subsidiary legislation thereof, or in cases where environmental integrity is threatened. This bank guarantee is without prejudice to any environmental liabilities that may ensue through failure to adhere with permit conditions or any other works/activity carried out on site. Should the Authority forfeit the Bank Guarantee either in part or in full, the Permit Holder shall ensure that this is replenished without undue delay in any case not exceeding 2 months from the date of forfeiture.
- 1.4.16. In cases where the bank guarantee does not cover the expenses incurred by the Authority to undertake any remedial action failed to be undertaken by the Permit Holder, the Permit Holder is to financially reimburse the Authority of all the expenses incurred.
- 1.4.17. The Authority may add, amend, delete or substitute any of the conditions of this permit after notifying the Permit Holder of its intention and after describing the changes to the Permit Holder. This is without prejudice to any prevailing circumstances that would preclude the Authority from following such a procedure.
- 1.4.18. The Authority may carry out regular compliance checks that vary in frequency according to the site's compliance with the permit conditions. Any checks or audits carried out by the Authority may be made at the Permit Holder's financial expense.
- 1.4.19. The Authority's representatives may inspect and photograph any part of the site and ask for any closed or locked areas to be opened and may demand to be provided with any proof, documentation, plans, receipts or any other records.
- 1.4.20. The Authority may suspend or revoke this environmental permit in line with the provisions of CAP 549.

- 1.4.21. The Permit Holder shall undertake all necessary measures and precautions to prevent spillage of raw materials, intermediates, products, waste and any other materials
- 1.4.22. The Permit Holder has the sole responsibility to ascertain compliance with legal obligations, permit conditions and to undertake activities on and off site in line with good environmental practices at all times.
- 1.4.23. Upon the joint application of the Permit Holder and a proposed transferee, the Authority may transfer the environmental permit to the proposed transferee. The transfer of the permit will not relieve any of the Permit Holders from his environmental obligations and liabilities.
- 1.4.24. Any incident including accidental release of liquid, solid or gaseous materials from the site that could be regarded as causing environmental damage, or as posing a threat of environmental damage, shall be reported as soon as possible and not later than within 24 hours to ERA, without prejudice to the emergency plan of the installation and Health and Safety.
- 1.4.25. Upon first notification by the Authority in the event of odour from the operations, the Permit Holder shall within one month of the notification submit a proposal for the abatement of such impacts for the Authority's approval and implement it in the timeframe prescribed by the Authority.

1.5. **Commissioning Conditions**

- 1.5.1. The following conditions apply to the commissioning phase of the site regulated through this permit.
- 1.5.2. Commissioning for the Vapour Recovery Unit and the petrol handling system shall follow the procedure detail in EP 0044/17/DOC1 or as otherwise instructed by the Authority through direct communication or permit conditions.
- 1.5.3. Further to 1.5.2 commissioning operations shall not deviate from the commissioning procedure approved by the Authority.
- 1.5.4. For the purpose of commissioning, loading, unloading or storage of petrol may take place prior to the installation of equipment for the recovery of petrol from vapours, including any buffer systems, herewith referred to as vapour recovery unit (VRU).
- 1.5.5. The Authority shall be notified in writing once installation and commissioning of the VRU has commenced, together with a timeline of the procedure which the Permit Holder shall abide with to ensure timely installation of the VRU. Up to where possible testing of the Vapour recovery unit will be performed prior to any commissioning which requires the use of petrol.
- 1.5.6. Fuel handling operations covered by this permit shall not commence until such time that the Authority confirms in writing the receipt of certification of the VRU and associated storage, loading and unloading equipment connected to the VRU, prepared by an approved auditor, showing the VRU is operating in accordance the specification of S.L. 549.52 submitted by the operator following finalisation of commissioning works.
- 1.5.7. The commissioning phase shall only be deemed concluded following a communication in writing by the Authority that the commissioning phase has been regarded as such.

1.6. **Operational Changes**

- 1.6.1. The Permit Holder may apply for a variation in permit and shall seek the Authority's written agreement prior to any operational changes, by sending to the Authority:

- a) Written notice of the details of the proposed change, including an assessment of its possible effects (including changes in emissions and waste production) on risks to the environment from the Permitted installation;
- b) Any relevant supporting information (e.g. chemical/fuel consumption, technical details, changes in the type/use of substances/mixtures, etc.);
- c) Any relevant supporting assessments and drawings, and;
- d) The proposed implementation date.

1.6.2. Any such change shall only be implemented following the granting of a variation of the permit by the Authority:

1.6.3. The Permit Holder shall notify the following matters to the Authority in writing at least 10 working days prior to their occurrence:

- a) Any change in the Permit Holder's trading name, registered name or registered office address; and
- b) Any change to particulars of the Permit Holder's corporate identity.

1.7. Improvement Programme

1.7.1. The Permit Holder shall complete the improvements specified in Table 1.7.1 by the date specified in that table, and shall send written notification of the date of completion of each requirement to the Authority on ced.coast@era.org.mt within 10 working days (of the completion of such requirement).

Reference	Requirement	Deadline
1.	Certification of impermeability of the trench through which pipeworks connecting the Enemed Fuel Filling Depot with the Has-Saptan Underground fuel storage installation are passing.	Upon completion of the commissioning phase
2	Certification for all bunds by an independent warranted architect or engineer showing that they are in line with conditions 2.5.3 and 2.5.4.	Upon completion of the commissioning phase
3.	Certification for the Oil/water interceptor at the Marsaxlokk Reclamation area by an independent warranted engineer shall be provided to the ERA.	Upon completion of the commissioning phase
4.	Submission of a REWS approved commissioning report for the entire facility.	Upon completion of the commissioning phase
5.	<ul style="list-style-type: none"> a) Submission of a method statement for approval by the Authority showing how the monitoring requirements for effluent discharges permitted in Section 2.3 will be sampled and tested in line with the requirements specified in Section 2.3.; and b) Commencement of monitoring and notification to the Authority. 	<ul style="list-style-type: none"> a) Within three (3) months of commissioning of the site.; and b) Within six (6) months of commissioning of the site.

6.	Installation and certification of flow-meter for on-site oil-water interceptor.	6 months from commissioning of the site.
7.	a) Submission of a method statement, for approval by the Authority, for the testing of storage tank thickness specified in condition 2.4.6. b) Submission of testing reports as described in a).	a) 12 months from the commissioning of the site b) Within timeframes agreed with the Authority in a).

1.8. Off-site Conditions

1.8.1. The Permit Holder shall ensure that no chemicals, fuels or waste escape to the environment especially when transporting such materials offsite or onsite. This shall include:

- a) transfer of fuel from maritime vessel to tanks and vice versa, and
- b) transfer of fuel from tank to tank both within and offsite through any pipework or otherwise, both above and underground.
- c) transport of fuel by road tanker to/from other sites.

2. Operating Conditions

2.1. Emissions to Air

2.1.1. All processes which generate significant levels of airborne contaminants (such as dusts, gases, odorous chemicals) shall have effective local collection and shall discharge (after treatment where necessary) through a stack or vent located and/or designed in such a way as to avoid local effect.

2.1.2. Emissions to air shall only arise from the emission points specified in Table 2.1.1. as shown on Schedule 5

Emission point references ¹	Source
PS1	Vent from Vapour Recovery Unit Handling vapours from all gasoline tanks (F8, F9, F10, F11, F12 & F13)
PS2	Vents handling vapours from all other fuels (F1, F2, F3, F4, F5, F6, F7, F14, F15, F16, F17, F18, F19)
PS3	Back up Generator

2.1.3. ERA recommends that diesel (gas oil) used for the generator and fire-pump shall have a Sulphur content not greater than 0.1%.

2.1.4. The limits for emissions to air for the generator (PS3) set out in Table 2.1.2 shall not be exceeded. The limits are defined at a temperature of 273,15 K, a pressure of 101,3 kPa and after correction for the water vapour content of the waste gases and at a standardised O₂ content of 3%.

Emission point reference	Parameter	Limit
PS3	Carbon Monoxide	-

¹ According to Section 7.1 of the application (as revised on 12th December 2019).

	Oxides of Nitrogen	200mg/Nm ³
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- 2.1.5. The Permit Holder shall ensure that the generator (PS3) referred to in Table 2.1.1 is certified at least every 3 years by an independent warranted engineer or an accredited laboratory with the first measurement taken within four months of granting of the permit. The certification shall include measurement of the parameters listed in Table 2.1.2. Monitoring from combustion plants shall be carried out whilst in operation. The certification and the monitoring results shall be submitted as part of the Annual Environmental Report. The Authority reserves the right to require an increase in the frequency of such measurements.
- 2.1.6. Certification for the fire pump shall be submitted to the Authority at least every 3 years. This certification shall be made by an independent warranted engineer.
- 2.1.7. During each measurement, the plant shall be operating under stable conditions at a representative even load. In this context, start-up and shut-down periods shall be excluded
- 2.1.8. The exhaust from general building ventilation (e.g. extractors or fans in walls or roofs) shall be vented in such a way as to avoid adverse environmental effects and in accordance with applicable legislation in this regard.
- 2.1.9. Should the Permit Holder intend to install equipment that could lead to additional emissions to air (e.g. boiler, generator etc.), a variation of this Permit must be secured prior to installation and operation of this equipment.
- 2.1.10. All abatement equipment and ducting shall be cleaned and maintained and record of such maintenance is to be kept in accordance with Condition 1.4.8 of this permit (as per manufacturer specifications).
- 2.1.11. The Permit Holder shall ensure that all abatement equipment is fully functional especially during tank-to-tank transfers and dispensing to road tankers.
- 2.1.12. Replacement of the abatement equipment shall be carried out within the timeframes specified by the manufacturer or as soon as these are saturated whichever comes first. The Permit Holder shall keep a set of spare abatement equipment on site ready for replacement.
- 2.1.13. The Permit Holder shall prevent or where that is not practicable reduce fugitive emissions of substances to air from the permitted installation. Any alternative techniques to be applied by the permit holder shall be no less effective than those applied within the installation and shall be approved in writing by the Authority prior to their implementation.
- 2.1.14. In the event of malfunction or breakdown leading to abnormal emissions, the Permit Holder must:
- a) Investigate immediately and undertake corrective action, and
 - b) Adjust the process or activity to minimise those emissions, and
 - c) Record the events and actions taken.
- 2.1.15. Further to Condition 2.1.13, the Permit Holder shall, at the written request of the Authority and within 10 working days, identify the specific cause of the of the abnormal emission and examine means for its elimination or minimisation including:
- a) Relocating / redesigning / extending the stack(s) or vent(s) to a point where the issue minimised.
 - b) Replacement of fuel.

- c) Preventative measures such as replacement of process materials (e.g. odorous solvents) by more environmentally sensitive compounds.
- d) Improved storage of materials.
- e) Use of additional abatement measures.

2.1.16. Further to Condition 2.1.13, the Permit Holder shall provide the Authority with details of the specific cause of the malfunction and the remedial steps taken or to be taken to address the malfunction.

2.2. **Odour and Fugitive Emissions**

2.2.1. The Permit Holder shall use the best possible practice so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the Permitted Installation to levels which are not a public health or environmental hazard, in particular from the:

- a) Process areas including the tank farm
- b) Fuel transfer area including the yard
- c) Storage areas, including fuel storage and waste storage
- d) Pipes, valves and other transfer systems
- e) Open surfaces

provided always that the techniques used by the Permit Holder shall be no less effective than those described in the Application, where relevant.

2.2.2. All emissions to air from operations on the site shall be free from odours at levels as are likely to cause adverse effects to the environment, harm to human health or serious detriment to the amenity of the locality outside the Site boundary, as perceived by an authorised officer of the Authority.

2.2.3. The Permit Holder shall ensure that all appropriate measures are taken to prevent or where that is not practicable to reduce odorous emissions from the permitted installation, in particular by:

- a) Controlling operational activities to minimise the generation of odour;
- b) Optimising the performance of abatement systems;
- c) Timely monitoring, inspection and maintenance;
- d) Employing an approved odour management plan;

provided always that the techniques used by the Permit Holder shall be no less effective than those described in the Application, where relevant or as otherwise agreed upon with the Authority.

2.3. **Effluent Emissions**

2.3.1. Discharges shall only take place from the oil-water interceptor/s treating the forecourt run-off and located shown on Schedule 5 and discharging effluent to the Oil-water interceptor at the Marsaxlokk Reclamation Area.

- 2.3.2. The Permit Holder shall carry out effluent analysis on an annual basis, for the discharge point referred to in condition 2.3.1 and table 2.3.1 in accordance with a monitoring proposal approved by the Authority.

Table 2.3.1 : Emission limits for effluent discharges on site

Emission point reference	Description	Parameter	Limit
E1	Forecourt oil-water separator	Heavy Hydrocarbons (C10-C40)	5 mg/L
		Total Petroleum Hydrocarbons (C12-C40)	

- 2.3.3. The effluent discharge-monitoring result shall include the following information:
- a. Frequency of sampling and identification of sampling points whereby each sample includes at least 2 replicates;
 - b. Methodology, limits of quantification and detection limits for each parameter to adequately assess compliance to the Emission limits values specified in Table 2.3.1 below; where a method with a detection limit appropriate for the emission limit value specified in Table 2.3.1 is not available, the Authority may allow a method with a higher detection limit to be used instead.
- 2.3.4. Availability of accreditation to MSA EN ISO/IEC-17025:2005 standard or other equivalent standards accepted at international level for each specified parameter in Table 2.3.1. The operator shall include a copy of the laboratory's accreditation certification.
- 2.3.5. The operator shall install a flow meter at E1 indicated in Table 2.2.1. If the discharge from the emission point is not continuous, the operator is to keep a record of days when discharge is carried out and the volume of effluent discharged from the emission point. A copy of the records for the previous year are to be submitted annually with the AER.
- 2.3.6. No discharge of effluent shall take place should the in-line analyser detect an exceedance of the threshold for petroleum hydrocarbons indicated in Table 2.3.1.
- 2.3.7. A certificate showing that the analyser has been calibrated to an appropriate standard is to be submitted annually as part of the AER.
- 2.3.8. The operations of the installation shall not hinder the achievement of good status for surface and groundwater as required under Subsidiary Legislation 549.100 Water Policy Framework Regulations.
- 2.3.9. The operator shall not allow the introduction into groundwater of any substance included in Subsidiary Legislation 549.53, Protection of Groundwater against pollution and deterioration.
- 2.3.10. All the bunds and the forecourt area for dispensing to Road Tankers, shall be surrounded by a gutter leading to an oil-water separator system, such that no fuel can escape from the forecourt or bunds into the environment. The fuel separator system installed shall be of the type 'Forecourt' Separator Class 1 in accordance to "MSA EN 858 - Separator systems for light liquids (e.g. oil and petrol). Principles of product design, performance and testing, marking and quality control."
- 2.3.11. Rainwater shall be segregated from all process areas that are potentially contaminated with chemicals and/or oils. If this is not possible, rainwater from areas where contamination by oil or chemicals is likely (such as loading/unloading and banded areas) shall pass through an adequately sized interceptor.

- 2.3.12. Oil/water interceptors shall be inspected by an independent warranted engineer at least once every year, and shall amongst other things inspect the interceptor for efficiency of operation.
- 2.3.13. Oil/water interceptors and related gutters shall be monitored and maintained to ensure efficient operations. A log of waste removal from the interceptors shall be maintained on site and be available for inspection by the Authority.
- 2.3.14. Foul sewer drains must be strictly segregated from storm water drains.
- 2.4. **Storage of Petrol and Vapour Recovery.**
- 2.4.1. All seals for tanks used for the storage of petrol are to be of the types specified in Schedule III of the Control of Volatile Organic Compound Emissions (Storage and Distribution of Petrol from Terminals to Service Stations), SL 549.52.
- 2.4.2. Any tanks used for the storage of petrol shall be fixed roof tanks in accordance to the requirements of Schedule IV of the Control of Volatile Organic Compound Emissions (Storage and Distribution of Petrol from Terminals to Service Stations), SL 549.52.
- 2.4.3. Any displaced vapours from mobile containers being loaded with petrol at the facility shall be returned through a vapour tight connection line to a vapour recovery unit for regeneration.
- 2.4.4. The Permit Holder shall ensure that petrol loading arrangements for bottom-loading vapour collectors and overflow protection of road tankers on site, including loading gantries, shall be equipped with all technical provisions specified in Schedule VIII of the Control of Volatile Organic Compound Emissions (Storage and Distribution of Petrol from Terminals to Service Stations), SL 549.52.
- 2.4.5. The Permit Holder shall ensure that bottom-loading vehicles on-site shall carry an identification plate which specifies the maximum permitted number of loading arms which may be operated simultaneously whilst ensuring that no vapours are released via the compartment's P and V valves, when the maximum plant back pressure is 55 millibar.
- 2.4.6. Following formal notification by the Authority, only bottom-loading mobile containers duly registered with the Authority shall be loaded with petrol.
- 2.4.7. The total annual loss of petrol from all storage installations on site shall be kept below the reference value of 0.01% mass by mass of the throughput as calculated in accordance with the procedure provided by the Authority.
- 2.4.8. The total annual loss of petrol resulting from loading and unloading of mobile containers on-site shall be kept below the target reference value of 0.005% mass by mass (m/m) of the throughput as calculated in accordance with the procedure provided by the Authority.
- 2.4.9. Petrol vapour concentration (corrected for dilution during treatment) from the VRU shall not exceed the hourly average of 10g/Nm³.
- 2.4.10. Measurements of the mean concentration of vapours for the vapour recovery unit shall be performed on an annual basis. Such measurements shall be made over a full working day of at least seven hours with at least four measurements per hour. Such measurements shall be made with equipment that can detect concentrations of 3g/Nm³ or lower. The equipment shall have a precision of at least 95% and an error which is not greater than 10% of the measured value.
- 2.4.11. All connection lines and pipes handling petrol vents are to be checked annually for leaks. These checks are to be recorded in the site operations log specified in section 4 and reported as part of the AER.

2.4.12. In the case of a vapour leak the Authority is to be immediately informed and loading operations are to be immediately shut down at the gantry.

2.5. **Storage of Fuels and other Chemicals**

2.5.1. Storage of fuels shall take place in the tanks designated in Schedule 6 and in the manner described in the application and conditions in this permit.

2.5.2. The Permit Holder shall ensure that all product storage tanks are of sufficient strength and structural integrity. All process and storage tanks should be rendered impervious to the substance stored in them.

2.5.3. Containers for bulk storage of chemicals and fuels shall be properly designed, located, labelled, bunded and maintained so as to prevent accidental spillage. The capacity of the bund shall be a minimum of 110% of the largest tank within the bund or 25% of the total capacity of all the tanks within the bund, whichever is the greater. All filling and off-take points shall be located within the bund. The Permit Holder shall also ensure and take all precautions to avoid any leakages or spills from liquid or solid material.

2.5.4. Further to improvement programme item 1 in table 1.6.1, the Permit Holder must ensure that the base and walls of all bunds are impermeable to water and petroleum products. The bunds shall be constructed using impervious material and ensuring that it can withstand the hydrostatic pressure which will be caused in the event of failure of one or more tanks within the bund. Any breaches in the bund base and walls by any valve or pipe used for draining the system shall be rendered to ensure that they are impermeable.

2.5.5. All product tanks in the tank farm shall be fitted with high and very high liquid level alarms.

2.5.6. The Permit Holder shall carry out ultrasonic testing of shell thickness on fuel tanks and report this as part of the AER. Such testing shall be carried out within 3 years of the granting of the permit in accordance with the methods specified in API 653.

2.5.7. All bunds and catchment pits shall be certified for integrity by an independent warranted architect or engineer at least once every three years, with the first certification being carried out within the timeframe provided in Table 1.6.1. The certification is to be submitted as part of the AER.

2.5.8. The Permit Holder shall ensure that visual inspection of the tanks and bunds is carried out at least once monthly by personnel on site, who shall as a minimum examine the following elements:

- a) Identification of any cracks or faults in the bund walls and/or floors;
- b) Whether the bund is holding rainwater during/after episodes of rain;
- c) Whether drain holes are present in the bund which could lead to emission (if this is the case, these would need to be sealed with waterproof cement);
- d) The presence of any damp patches which could indicate cracks.

2.5.9. Any faults identified during the inspection must be followed by immediate action to remedy the situation. Such inspection must be recorded, together with any faults and remedial actions taken. A report of such inspections is to be submitted annually as part of the AER.

2.5.10. All tank maintenance shall take place on a regular basis and in accordance with the latest industry standards.

2.5.11. Utilisation of chemicals, other than for the general housekeeping, shall not be allowed on premises. If the utilisation of any other chemicals is required, the operator shall seek the Authority's approval prior to any such use.

2.6. **Product Transfer to road tankers**

2.6.1. The un/loading of petroleum products between road tankers and product tanks shall be supervised at all times.

2.6.2. Any transfer of liquid waste, product, chemicals and oils shall take place within an area fitted with adequate secondary containment and under supervision.

2.6.3. All fuel pipelines, flanges and valves shall be certified by an independent warranted architect or engineer to be completely leak-proof for the first time within one year of the granting of this permit and thereafter at least once every three years. The certification shall be included in the AER.

2.6.4. All flanges and valves fitted on over-ground pipes used to transport materials other than uncontaminated water, where no permanent provision for containment of leaks is provided, shall be subject to weekly visual inspection or otherwise monitored for leaks to the satisfaction of the Authority. All such inspections shall be recorded in a log which shall be available for inspection by the Authority.

2.6.5. The Permit Holder shall ensure that all road tankers are fitted with locks, taps or valves that are permanently fixed. These must be locked shut when not in use.

2.7. **Waste**

2.7.1. All operations concerning the management of waste are subject to the Waste Management Regulations S.L. 549.63 and the Waste Management (Activity Registration) Regulations S.L. 549.45.

2.7.2. Waste produced at the Permitted Installation shall be recycled, reused or recovered unless technically and/or economically impossible.

2.7.3. All wastes shall be stored within a designated and controlled storage area(s) prior to ultimate disposal. Wastes to be recycled shall be stored in a designated container or area and shall not be mixed with other wastes.

2.7.4. Liquid and hazardous wastes shall be stored in a labelled, closed container(s) within the designated and controlled bunded storage area(s) prior to ultimate disposal. Wastes of different natures and having different European Waste Catalogue codes as established by Commission Decision 2000/532/EC shall not be mixed in the same container.

2.7.5. Packaging material and containers which came into contact with hazardous substances shall be regarded as hazardous waste and shall be disposed of in an appropriate manner.

2.7.6. No storage of waste, equipment or materials is permitted on property outside the site premises.

2.7.7. No storage of waste destined for disposal is permitted for a period exceeding 12 months and no storage waste destined for recovery is permitted for a period exceeding 3 years.

2.7.8. The Permit Holder shall ensure to keep records for every consignment of wastes removed from the Site indicating the EWC Code, description, quantities, date of removal, contractor name (including for transport), consignment note number (where applicable) and manner and place of final disposal/recovery.

2.7.9. Off-site disposal or recovery of wastes may only take place at a facility licensed for that purpose.

- 2.7.10. On-site disposal of wastes by any means including burning, disposal to drain or surface water, burying or deposition on land is prohibited. This excludes treated waste water discharged from the oil-water separator.
- 2.7.11. Movement of hazardous waste to authorised facilities shall be covered by a valid consignment permit obtainable from the Competent Authority. Each movement shall also be covered by a consignment note obtainable from the Authority
- 2.7.12. Should the Permit Holder require the services of a waste broker, it shall be ensured that any such broker is a duly registered waste broker in accordance with S.L. 549.45.
- 2.7.13. In the case of waste that is sent for treatment or recovery to another facility locally or abroad, the audit trail shall cover all waste from the point of generation or collection to the end recovery or disposal facility.
- 2.7.14. Transboundary movement of waste shall be carried out in accordance with the following regulations, as amended from time to time:
- a) Regulation (EC) N° 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste as implemented through S.L. 549.65;
 - b) Commission Regulation (EC) N° 1418/2007 of 29 November 2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) N° 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of waste does not apply, and
 - c) Any other applicable legislation.
- 2.7.15. The Permit Holder shall make use of the services of a registered waste carrier for the transport of waste from the site in accordance activity 38 of Schedule 1 of S.L. 549.45, the Waste Management (Activity Registration) Regulations. Where the company removes wastes using its own transport the vehicle(s) must also be registered as a waste carrier in accordance with S.L. 549.45 or any statutory provisions or regulations amending or replacing them.
- 2.7.16. For any decommissioned equipment, the Permit Holder shall submit to the Authority a proposal for the screening of the intended equipment to be discarded which should include the details of any hazardous materials in the equipment, decontamination procedures and the procedure for final disposal.
- 2.7.17. Disposal and/or recovery certificates shall be kept on record and made available for inspection for a period of at least 5 years from date of their issue.

2.8. **Accident Prevention and Control**

- 2.8.1. An Emergency Response Plan shall be followed and maintained containing details of the location, nature and quantity of chemicals, oils and fuels stored, any special hazards, a drawing showing location of drains and the emergency phone numbers of the Permit Holder and relevant authorities. It shall also include actions to be taken in the case of incidents which could affect the environment, such as fires and chemical/fuel spills. The emergency plan shall indicate that accidental releases of chemicals and fires caused by chemicals are to be managed as specified in the respective SDS.
- 2.8.2. The Emergency Response Plan shall be updated whenever necessary and the updated version sent to ERA. This plan shall be consistent with the requirements and provisions set out under the COMAH regulations.

- 2.8.3. Upon renewal, the emergency response plan shall be updated to include any operational changes and/or additions. In the event that no changes and/or additions were carried out within the permit's timeframe; a confirmation from an independent competent person shall be submitted clearly stating that no further update is necessary.
- 2.8.4. In the case of an accident (e.g. fuel spills, etc.), the Permit Holder shall follow the Emergency Response Plan referred to in Condition 2.8.1 and shall notify the Authority within 24 hours.
- 2.8.5. Spillages of fuels or other hazardous material shall receive immediate attention to prevent escape to drain, surface water or land. Spilled material shall be disposed of in an appropriate manner. Kits for the collection of liquid and powder spills shall be available on site at strategic locations.
- 2.8.6. Small leaks or spills shall be cleared up immediately by the application of absorbent materials. All used absorbent materials shall be disposed of hazardous waste at facilities permitted to accept such waste. Transfer of this waste shall be carried out as per conditions in Section 2.6 of this permit.
- 2.8.7. The Permit Holder shall have in storage an adequate supply of suitable absorbent material to absorb any spillage.

3. Closure and Decommissioning

- 3.1. The Permit Holder shall notify the Authority prior to ceasing operations in part or in full, whereby an application for cessation of operations shall be made to the Authority and shall include a decommissioning plan.
- 3.2. In the event of cessation of operations on the site, the Permit Holder shall remain responsible for all wastes and hazardous materials on site, which shall be removed from the site in accordance to good environmental practice and in such a manner that minimises environmental risks.
- 3.3. The Decommissioning Plan shall be implemented once approved by the Authority and within 12 months of final cessation of operations or as agreed with the Authority in writing.
- 3.4. The obligations arising from this permit shall subsist until the Authority confirms in writing that the decommissioning plan has been implemented to its satisfaction.
- 3.5. When deemed necessary, the Authority may require the Permit Holder to take such additional measures as it considers necessary with respect to after care obligations in relation, but not limited to the remedial action, rehabilitation, and monitoring of the waste management or waste production site.

4. Records

- 4.1. A site daily operations log shall be made in a legible manner and kept on site and be made available for inspection by the Authority at any reasonable time. The following information shall be recorded on a daily basis and retained for 5 years:
 - a) Any incidents that took place on site such as mechanical faults in the machinery or equipment used on site, any spills, fires, etc. and the remedial action taken.
 - b) Any maintenance and inspections carried out on machinery and equipment
 - c) Any defects or damage to the Site Security System
 - d) Any other incidents that the Permit Holder deems important to record

- e) Total amount of waste in kilos removed from site for disposal or further treatment.
- 4.2. Each record shall be compiled within 24 hours of the relevant event. The records kept in the daily operations log shall be available for inspection at any time when the Authority representatives request to inspect them.
- 4.3. The Permit Holder may wish to establish an Environmental Management System (EMS) to facilitate compliance with permit conditions and to assist in formalising procedures required by this permit. An EMS can take the form of a standardised system (e.g. EN ISO 14001:1996 or EMAS) or a non-standardised (“customised”) system, provided that is properly designed and implemented. Guidance for a non-standardised (“customised”) system is included in schedule 3 of this permit.

5. Ozone Depleting Substances and Fluorinated Greenhouse Gases

- 5.1. No new equipment or components (including refrigeration and firefighting equipment or insulation foam) containing substances falling within the scope of EC Regulation No. 1005/2009 on substances that deplete the Ozone Layer & S.L. 549.58, Substances depleting the ozone layer regulations shall be installed within the site.

6. Management and Technically Competent Person

- 6.1. All employees authorised by the Permit Holder to undertake activities on his/her behalf, shall be fully conversant with the obligations of this permit and shall be individually aware of their responsibilities and liabilities in observing the conditions of this permit.
- 6.2. One member of the staff is to be nominated as the Technically Competent Person (TCP) of the site, whereby this person is to physically represent the Permit Holder during the times when the Permit Holder will not be available.
- 6.3. The TCP is responsible for the implementation of all the obligations stipulated in this permit, must supervise the rest of the staff on site and is completely responsible to ascertain that all permit conditions are being adhered to and that unauthorised waste does not enter the site.
- 6.4. The TCP is to be present at all times on site and in her/his absence another member of staff is to substitute him/her temporarily. In the event that a TCP terminates her/his employment, another person shall be appointed as a TCP immediately and the Authority shall be notified of this change.
- 6.5. In the event of any short or long periods of sick leave or vacation leave taken by the TCP for a period exceeding 10 days, the Permit Holder is obliged to find a replacement for that member of staff without delay.
- 6.6. In the event where operations cease temporarily (more than 2 weeks), the TCP or Permit Holder are obliged to notify the Authority within two (2) days and are also to notify the Authority with regards to when the works are intended to resume.
- 6.7. All the staff on site should be fully aware of the procedures to be taken to contain any environmental hazard which may arise related to the activities being carried out on site.

7. Reporting

- 7.1. The Permit Holder shall submit to the Authority an Annual Environmental Report (AER) of the previous year by not later than end of March of each year, providing the information listed in Schedule 1 of this Permit and in the format specified therein.

- 7.2. The Permit Holder shall notify the Competent Authority immediately on becoming aware of any factor that has prevented or may prevent compliance with any of the conditions of this permit. Details of the factor and why compliance has been or may be prevented shall be provided

8. Notifications

- 8.1. The Permit Holder shall immediately notify the Authority upon:
- a) The detection of an emission of any substance which exceeds any limit or criterion in this Permit specified in relation to the substance;
 - b) The detection of any fugitive emission which has caused, is causing or may cause significant pollution;
 - c) The detection of any malfunction, breakdown or failure of plant or techniques which has caused, is causing or has the potential of causing significant pollution;
 - d) The detection of any odours as described by Condition 2.2.7; and
 - e) Any accident which has caused, is causing or has the potential of causing significant pollution.
- 8.2. The Permit Holder shall submit written confirmation to the Authority of any notification under Condition 8.1, by sending:
- a) The information listed in Part A of Schedule 2 to this Permit within 24 hours of such notifications; and
 - b) The more detailed information listed in Part B of Schedule 2 as soon as practicable;
- 8.3. The Permit Holder shall also notify the Authority:
- a) To request a variation of the permit, as per Condition 1.5.1.a;
 - b) Prior to cessation of operations, as per Condition 6.6;
 - c) Prior to resumption of operations, as per Condition 6.6;
 - d) Upon completion of an Improvement Programme item, as per Condition 1.6.1;
 - e) Prior to major projected tank maintenance works, as per Condition 2.5.10;
 - f) Upon change in the TCP, as per Condition 6.4;

Schedule 1

Annual Environmental Report

Important note: By this submission, you confirm that you give your explicit consent for the entire contents of this Annual Environment Report to be made available on the Authority's public website.

S1.1 Introduction

Environmental Permit Number	
Reporting Year (Calendar Year: 1 January to 31 December)	
Name and locality of Site	
Brief description of activities at the site	

S1.2 Off-site transfers of hazardous waste

Date of transfer	EWC Code ²	Quantity of waste (in kg)	Consignment note number and/or TFS (Transfrontier Shipment of waste) reference number	Ultimate destination

² European Waste Catalogue Code (Reference: Commission Decision 2014/955/EU amending Decision 2000/532/EC on the list of waste pursuant to Directive 2008/98/EC of the European Parliament and of the Council)

S1.3 Transport of Waste

Name(s) of registered waste carrier used during reporting year	Waste type(s) transported

S1.4 Fuel Annual Throughput

Fuel Type	Annual Throughput (in litres)
Gasoil	
Kerosene	
Blended Diesel	
Continue if required	

S1.5 Reporting sheet for petrol losses

Attach Excel Sheet '*Petrol Losses from Terminals*' from the ERA Website <https://era.org.mt/topic/terminals/> or as otherwise instructed by the Authority.

S1.6.1 Testing of pipes, pumps, valves, flanges and the oil interceptors

	Quantity on site	Date of last test	Date or last test	Testing due on (date)
Fuel pipelines				
Pumps				
Valves				
Flanges				
Petrol venting pipework				
Oil interceptors				

S1.6.1 Bund Testing

Number of bunds on site	
Number of visual inspections carried out during reporting year on each bund	
Total number of faults identified during reporting year	
Total number of faults rectified during reporting year	

S1.7 Incidents and Complaints

S1.7.1 Non-Compliance Incidents during Reporting Period

Date of incident	Brief description of Incident	Cause	Corrective action

Total number of non-compliance incidents for previous year:	
Total number of non-compliance incidents for current reporting period:	

S1.7.2 Complaints made by the public or through Authority

Date of complaint	Description of complaint	Actions taken

Total number of complaints for previous year:	
Total number of complaints for current reporting period:	

S1.8 Emissions to air

Parameter	Emission point reference	Limit Value	Standard methodology used	Total annual number of exceedances ³		Concentration (Annual Average)		
				Previous reporting period ⁴	Present reporting period	Unit	Previous reporting period	Present reporting period
Carbon Monoxide	P3	-				mg/m ³		
Oxides of Nitrogen		200 mg/m ³				mg/m ³		
Petrol vapours	PS1	10g/Nm ³				g/Nm ³		

Name of laboratory where tests in this section have been carried out	
Is this laboratory accredited (certified) for the above tests? (Yes/No)	

³ If the total number of exceedances exceeds 0, the value of each of these exceedances (for the reporting year) must be submitted in a separate report, together with action taken to regularise the situation.

⁴ "Previous reporting period" is not applicable for the first reporting period.

S1.9 Submission of certificates

Certificate of inspection of Oil/water interceptors by an independent warranted engineer.	<input type="checkbox"/>
Certificate showing that the analyser has been calibrated	<input type="checkbox"/>
Certificate by a warranted engineer showing that the generator is in good working order. ⁵	<input type="checkbox"/>
Certification of good working order for fire-pump ⁵	<input type="checkbox"/>
VRO monitoring results (Mean concentration of emitted vapours)	<input type="checkbox"/>
Records of checks for connection lines, pipes and vents handling petrol	<input type="checkbox"/>
*Certification of tank skin thickness testing	<input type="checkbox"/>
*Certification of tank field bund	<input type="checkbox"/>
Tank Fault records	<input type="checkbox"/>
**Certification for pipework being leak-proof	<input type="checkbox"/>
Certification of oil/water separator	<input type="checkbox"/>

*Submission required with AER of March 2024

**Submission required with AERs of March 2021 and 2024

S1.10 Submission of Effluent emissions analysis

Emission point reference	Source	Parameter	Limit (mg/L)	Date of test	Result (mg/L)
E1	Forecourt Oil-Water Separator	Heavy Hydrocarbons (C10-C40)	5		

Name of laboratory where tests in this section have been carried out	
Is this laboratory accredited (certified) for the above tests? (Yes/No)	
Flow meter discharge records	

⁵ Every 3 Years

Applicant's Declaration

I declare that, to the best of my knowledge, all the above information is correct and substantiated.

Name
(in block letters)

ID Card Number

On behalf of / in my own name
(in block letters)

Schedule 2

Notification of Abnormal Emissions

This page outlines the information that the Permit Holder must provide to satisfy Conditions 8.2 of this Permit.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by a request for commercial confidentiality.

Part A

Permit Number	
Name of Permit Holder	
Location of Installation	
Location of the emission	
Time and date of the emission	

Substance(s) emitted	Media <i>(e.g. air, groundwater)</i>	Best estimate of the quantity or the rate of emission <i>(include units)</i>	Time between which the emission took place

<p>Measures taken, or intended to be taken, to stop the emission</p>	
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Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission.	
The dates of any unauthorised emissions from the installation in the preceding 24 months.	

Name ⁶	
Designation	
Signature	
Date	

⁶ Authorised to sign on behalf of Permit Holder

Schedule 3

Minimum requirements for an Environment Management System (EMS)

1. **Management and Reporting Structure**

This should in particular include the name of the person who will be responsible for managing environmental aspects of the installation. Relevant qualifications and experience should be listed, together with contact details (including a mobile number for emergency purposes).

2. **Environmental Objectives and Targets**

The section should include a review of all operations and processes, a commitment by the operator to continuous improvement, and identification of priority areas where improvement to the operations is necessary and practicable, such as:

- a. recycling of materials;
- b. minimisation of waste;
- c. efficient use of resources (especially water and energy);
- d. use of biodegradable chemicals;
- e. minimising use of solvents;
- f. procedures to minimise noise disturbance to neighbours;
- g. phasing out of CFCs and ozone-depleting substances, if any.

Targets should be set for priority areas identified (e.g. minimising waste generation by a predetermined percentage annually).

3. **Environmental Management Programme (EMP)**

This should include a time schedule for achieving the Environmental Objectives and Targets prepared under point 2 above. The time schedule should cover a period of 5 years. The EMP should include:

- a. designation of responsibility for targets;
- b. the means by which they may be achieved;
- c. the time within which they may be achieved.

Targets and performance should be reviewed annually as part of the EMS.

4. **Documentation**

A system of documentation should be established to ensure that records are kept of the priority areas chosen according to point 2. In addition, the operator should issue a copy of the environmental permit to all relevant personnel whose duties relate to any condition of the permit.

5. **Corrective Action**

The operator should establish procedures to ensure that corrective action is taken should the specified requirements of the environmental permit not be fulfilled. The responsibility and authority for initiating further investigation and corrective action in the event of a non-conformity with the environmental permit should be defined.

6. **Awareness and Training**

The operator should establish and maintain procedures for identifying training needs, and for providing appropriate training, for all personnel whose work can have a significant effect upon the environment. Appropriate records of training should be maintained.

7. **Maintenance Programme**

The operator should establish and maintain a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing should support this maintenance programme. The licensee should clearly allocate responsibility for the planning, management and execution of all aspects of this programme to appropriate personnel.

Schedule 4

Site Map

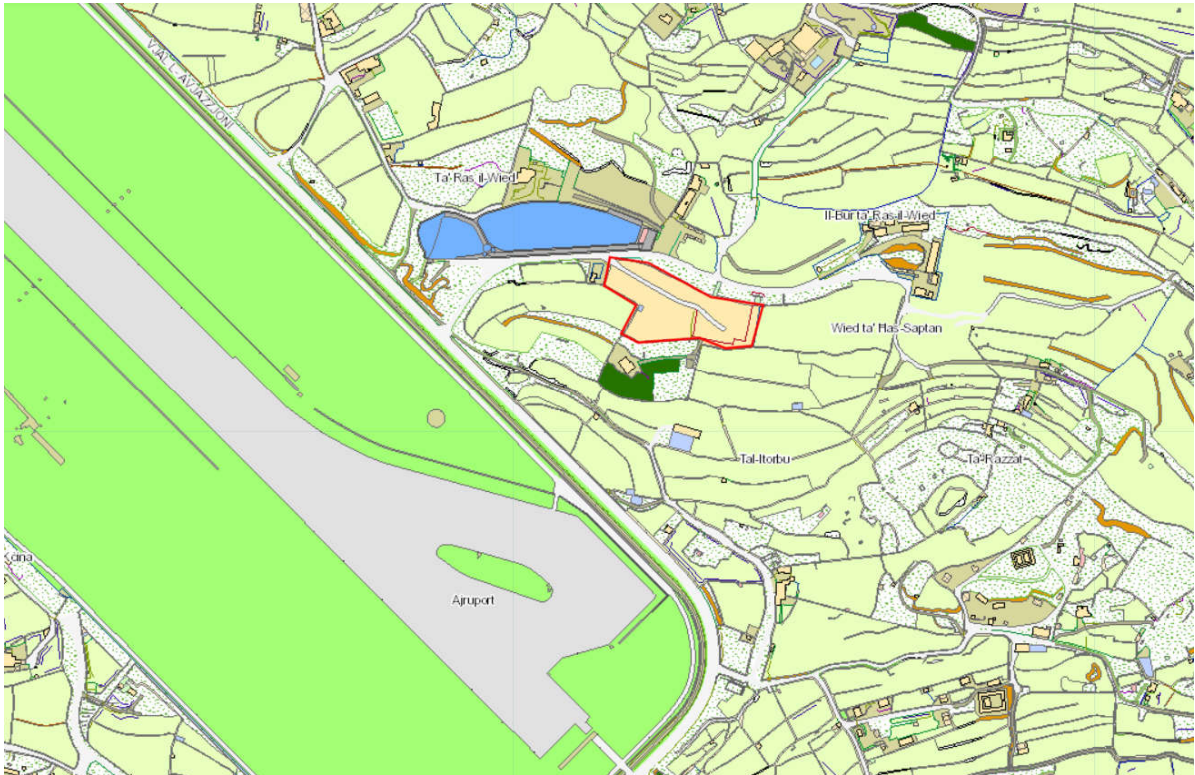
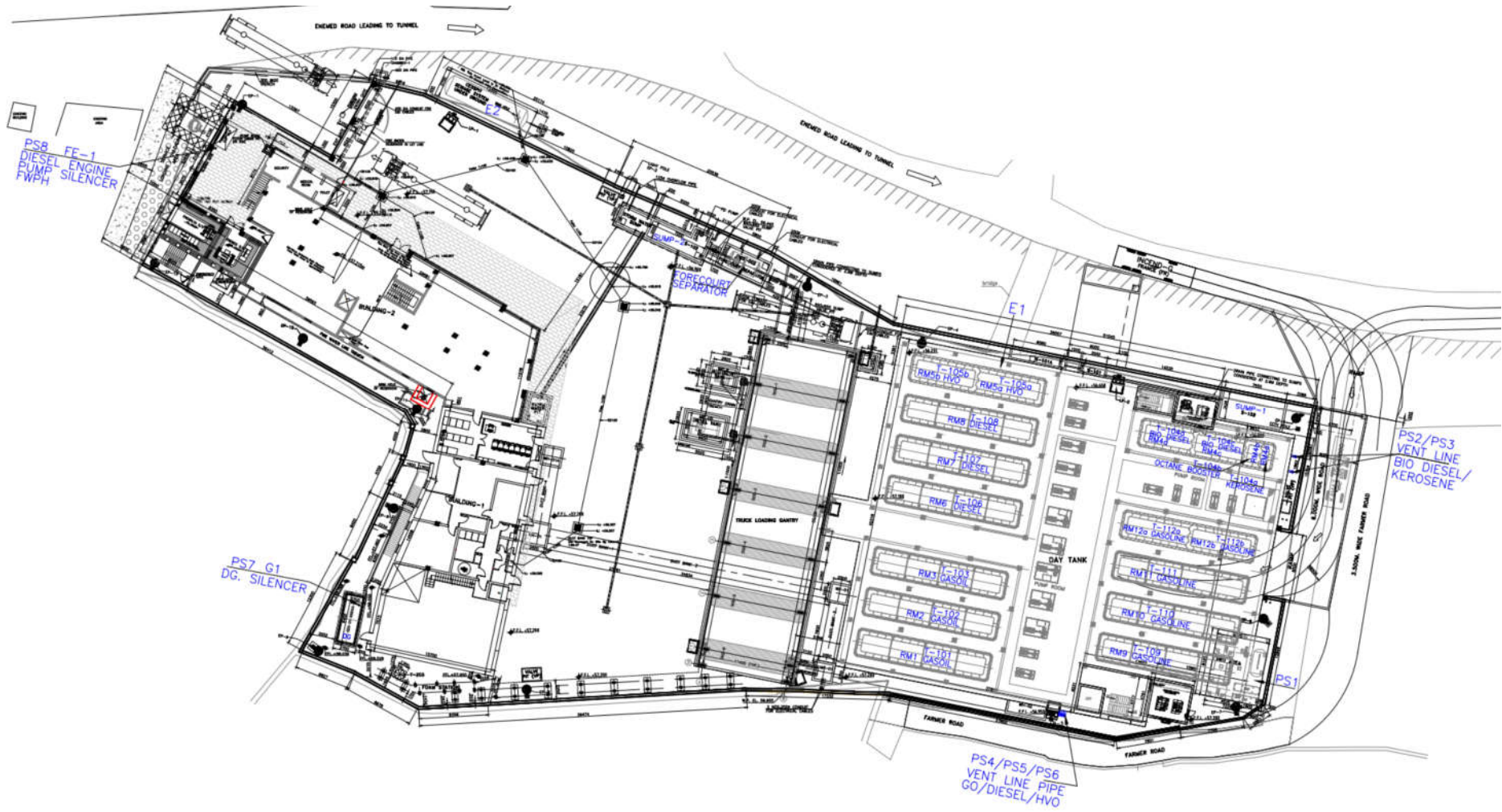


Figure S5.1: Site of installation showing the extent of the areas of operation in red. These cover the areas within which the activities specified in Condition 1.2.1 take place. The extents shown are indicative and should not be used for interpretation purposes

Schedule 5 Forecourt and Office Layout



Schedule 6 Tank Farm Layout



END OF PERMIT

Relocation of Vapour Recovery Unit from 31st March 1979 Installation, B'Bugia to new Has-Saptan Facility

The relocation of the VRU from its present location at B'Bugia to the new facility at Has-Saptan is estimated to take around five to seven weeks. This involves the dismantling of the unit, transportation to the new site, re-assembly and installation, connecting up to the new facility, start-up and commissioning. The timeline is expected to be as follows:

- Week1 Gasoline tanker discharges at B'Bugia and tanks are filled to provide back up for Has-Saptan Facility
- Gasoline tanker discharges at Has Saptan
- VRU will be left to operate with the vapour inlet line closed to regenerate the filters and to reduce the amount of vapour in the charcoal as much as possible.
- Isolation of inlet and outlet absorbent pipelines and vapour inlet.
- Isolation of VRU from power supply.
- Opening of absorbent tank for gas freeing.
- Removal of charcoal, washing and ventilating.
- System made gas free to enable dismantling.
- Week 2 Disconnection of pumps, pneumatic system, nitrogen supply, power and communication cables.
- Dismantling of air intake manifold and vapour lines.
- Removal of vapour fan and funnel.
- Removal of platforms and ladders.
- Disconnection of vapour inlet lines and manifold to allow removal of filters.

- Week 3 Removal of column, absorbent tank and whole skid.
 Removal of I.O. station
 Dismantling of switchgear and removal of air compressor.
 Transportation of VRU to Has Saptan is planned to start in week 3
- Weeks 4 - 5 Transportation to site of skid, tanks, platforms and auxiliaries.
 Re-installation of VRU including all equipment and auxiliaries.
- Week 6 Start up and commissioning under supervision of manufacturer's engineer.

As per above schedule, the VRU is planned to take about 6 weeks for dismantling and re-assembly as Has Saptan.

The VRU at Birzebbuga is currently connected to the storage tanks only.

The loading of trucks at Birzebbuga is done by the "top-loading" method and so no capture of volatile compounds is done during the loading of the trucks. This means that the VRU is active, and effective, during the discharge of gasoline ships into the storage tanks only.

The installation at Birzebbuga is unfortunately in the midst of a densely populated village with the nearest houses a few meters away from the tank farm. This means that the use of a VRU is necessary during the discharge of ships as this prevents the people living in the vicinity of the installation from the unpleasant odors that would have otherwise escaped from the tanks' vents during the discharge operation.

The installation built at Has Saptan is equipped with bottom loading filling gantries and so the VRU will be capturing vapors released from all gasoline storage tanks and road-tankers during loading.

The scope of the project is to transfer the VRU at Birzebbuga to Has Saptan. Also it is planned that the Birzebbuga installation is kept with adequate fuel stocks and retained on cold stand-by until the commissioning of the Has Saptan installation is completed. This (cold standby) is expected to take around 6 months. After this stand-by period the fuel stored at Birzebbuga is loaded onto road-tankers and distributed to petrol stations. This is the same procedure which is currently in operation.

On the contrary to Birzebbuga, as Has Saptan is remote from any dwellings, any release of hydro-carbons would not cause any inconvenience to anybody.

The transfer of the VRU from Birzebbuga to Has Saptan is planned to be carried out as per above schedule.

During Week 1, a shipment of gasoline will be discharged in Has Saptan to enable Enemed to start commissioning of all equipment including Truck Loading facilities.

Once all the equipment is tested, Has Saptan will be ready to start operation. During testing the gasoline loaded into trucks will be delivered to Petrol Stations, which for about 4 weeks, this loading will be done without the VRU (until the VRU is re assembled and connected). This procedure is the same as the current procedure at Birzebbuga.

This procedure means that there will not be any discharge of gasoline into Birzebbuga without the use of the VRU – thus no change at Birzebbuga, as the loading of trucks is already without the use of the VRU.