



ERA
Environment & Resources
Authority

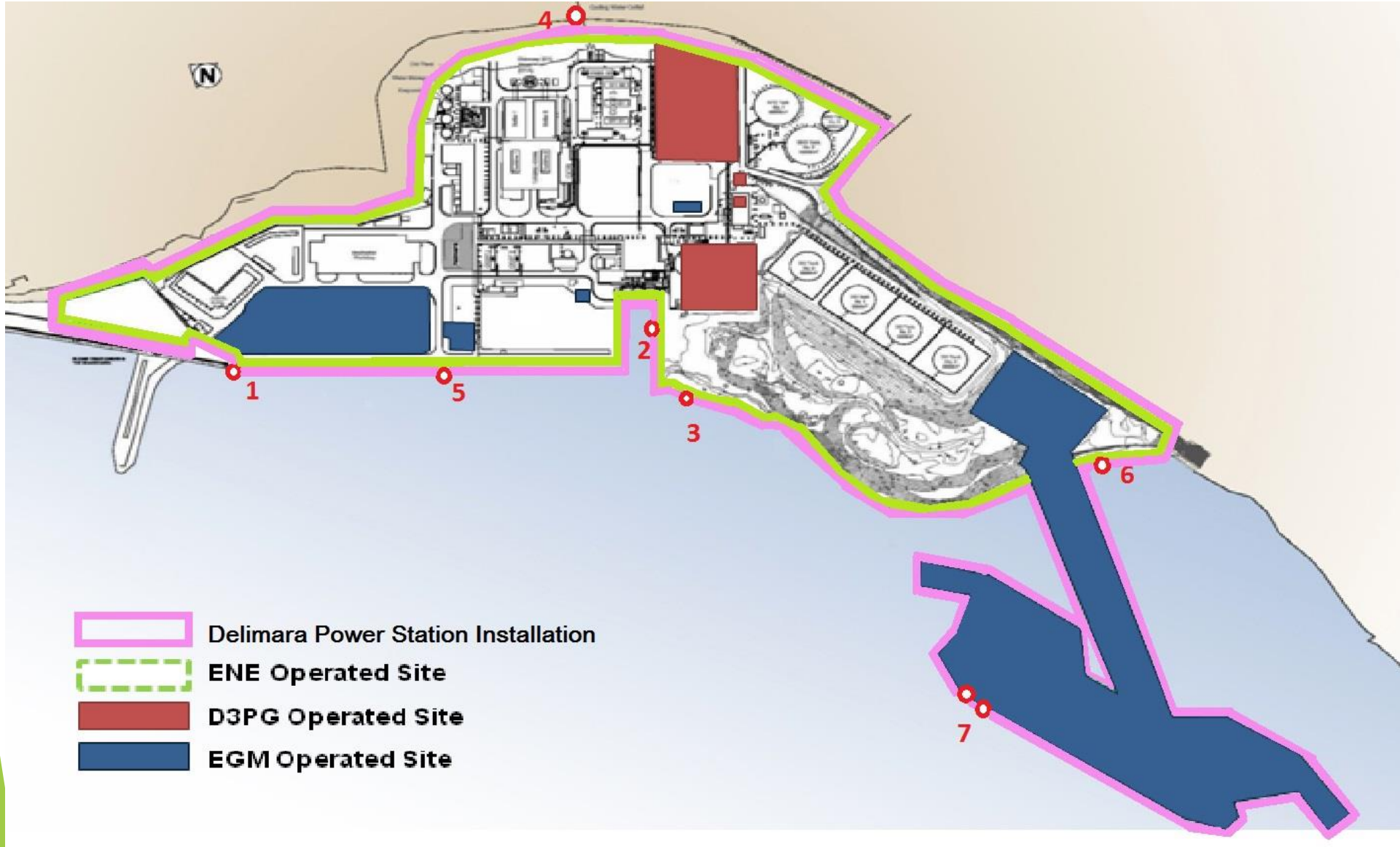
IPPC Permit for Delimara Power Station.

IP 0002/21

Renewal & Variation of IP 0002/07/G

Environmental Permitting Unit
Environment and Resources Authority

The Installation



Permit History

Permit Number	Details	Date of Issue	Date of expiry
IP0002/07/A	<u>New Permit</u>	29 March 2010	29 March 2014
IP0002/07/B	<u>Renewal and Variation</u> to include Diesel Engines	06 December 2011	06 December 2015
IP0002/07/C	<u>Variation</u> - proposed extension to condition 2.2.1.7.9 from September 2012 to June 2013	23 July 2012	06 December 2015
IP0002/07/D	<u>Variation</u> - proposed extension to condition 2.2.1.7.9 from June 2013 to March 2014	17 September 2013	06 December 2015
IP0002/07/E	<u>Variation</u> - Public consultation on the determination of the choice of fuel for DPS6	1 April 2014	06 December 2015
	Permit Extension of validity	1 December 2015 30 May 2016 2 December 2016	
IP0002/07/F (IP0002/07/Fi, IP0002/07/Fii, IP0002/07/Fiii)	<u>Renewal and Variation</u> to existing permit by Electrogas Malta Ltd., D3 Power Generation Ltd., and Enemalta plc.	11 January 2017	19 December 2020
IP0002/07/G (IP0002/07/Gi, IP0002/07/Gii, IP0002/07/Giii)	Partial surrender and renewal	22 September 2017	25 August 2021
	Permit Extension of validity	9 July 2021	25 February 2022

The Proposal

Enemalta plc.

- ▶ Variation inclusion of an addition emission point to air (medium combustion plant)
- ▶ Variation inclusion of fuel transfer activities to third parties
- ▶ Renewal

ElectroGas Malta Ltd.

- ▶ Variation application (20 listed variations)
- ▶ Renewal

Delimara 3 Power Generation Ltd.

- ▶ Renewal application

Application IP 0002/21/i

IP 0002/21/i addressing ElectroGas Malta Ltd renewal and variation. Changes proposed include:

- Ship-to-Ship transfer - **LNG offloading**;
- **Glycol expansion tank** upgrade;
- Improved **Power Supply Feeder**;
- Addition of **FSU Boil-Off Gas Attenuator**;
- **Improved** bunding of make-up water glycol tank;
- Introduction of Oily Water Separator at Regasification Site;
- Additional of an **oil boom** to improve emergency response in case of oil spill;
- Introduction of a **fixed sewage connection** to the portacabin office facilities;
- Installation of **Chemical Stores** used in plant operation/maintenance (at both generation and regasification sites)
- Installation of **office facilities** as approved by PA/04297/18;
- Updates with respect to use of **fluorinated gases** on site;
- Upgrade to reflect changes in **fire suppression systems** in line with regulations;
- Replacement of a **cooling water pump**;
- **Removal of AST and QAL 2** testing requirement for GT bypass stacks;
- The use of an **Inert Gas Generator** on board the FSU; and
- Changes in the status of the **cooling water mixing chamber**.
- Inclusion of **additional emission point to air**

Internal Consultation (1)

Environment Assessment Unit	Commented that the assessment and conditions for PA/00021/14 and PA/00022/14, remain valid. No additional conditions were proposed, following the revised variations.
Biodiversity and Water Unit	Recommended that the existing limits in relation to marine discharge in the permit are retained and provided emission limit values on the sediment monitoring for inclusion in the proposed permit.
Environmental Permitting Unit (Trans Frontier Shipment)	There are no comments from a TFS perspective

Internal Consultation (2)

Ambient Quality and Waste Unit	A number of additional metrics, and revisions to the emission limits values were also requested to be included in the permit.
Compliance and Enforcement Directorate	No objections on latest amendments provided by Enemalta. Moreover there are no comments with respect to the status of the improvement programme items for IP0002/07/Gi , IP0002/07/Gii & IP0002/07/Giii

Regulatory Consultation (1)

A regulatory consultation was carried out between 23rd April 2021 - 7th May 2021 and between 1st June 2021 - 8th June 2021 and 25th October 2021 - 8th November 2021

- ▶ Energy and Water Agency
- ▶ Malta Resources Authority (MRA)
- ▶ Planning Authority (PA)
- ▶ Civil Protection Department (CPD)
- ▶ Malta Consumer and Competition Affairs Authority (MCCAA)
- ▶ Environmental Health Directorate (EHD)
- ▶ Regulator for Energy and Water Services (REWS)
- ▶ Occupational Health and Safety Authority (OHSA)
- ▶ Transport Malta (TM)
- ▶ Water Services Corporation (WSC)

Regulatory Consultation (2)

Malta Resources Authority (MRA)	No feedback was provided
Civil Protection Department (CPD)	No feedback was provided
Planning Authority	No feedback was provided
Malta Competition and Consumer Affairs Authority	No feedback was provided
Energy and Water Agency	No feedback was provided

Regulatory Consultation (3)

Transport Malta	With respect to the aspects on bunkering and aspects in relation to the storage of fuel for third parties within pre-existing storage tanks, Transport Malta commented that they do not have any comments subject that the internal and external emergency response plans are updated or already cater for the type of fuel.
Water Services Corporation (WSC)	No objections from DPU however with respect to update provide by Enemalta the operation (storage and transfer of HFO and Gasoil) must be covered by a Public Sewer Discharge Permit (DMU 6465) issued by Water Services Corporation. This has been renewed annually over the past years as per obligations of S.L. 545.08.

Regulatory Consultation (4)

Regulator for Energy and Water Services (REWS)	Following a number of clarifications on the bunkering the storage of fuels, the REWS stated that they have no further comments.
Environmental Health Directorate	<p>No objection to the variation. Provided generic comments with respect to mitigation measures on air and noise and contamination of groundwater and sea water.</p> <p>In the case of any oil and/or fuel spill end into the sea, the applicants should immediately inform the Environmental Health Directorate since opposite to the scheme there are several bathing zones.</p> <p>It is recommended that no re-fuelling of oil and/ or fuel from offshore vehicles is carried out in poor weather conditions that could cause accidental discharge into the sea. The necessary mitigation measures and monitoring procedures are to be adopted.</p>

Regulatory Consultation (5)

Occupational Health and Safety Authority (OHSA)

OHSA stated that they have communicated to the applicant/s, issues related to COMAH are to be included in the revised safety report. Furthermore the applicant/s shall abide by all relevant occupational health and safety regulations in particular updating of risk assessments due to new and, or modified work practices. A number of safety related COMAH documentation has been submitted, notwithstanding foreign consultants will have to be engaged to evaluate all the documents.

Public Consultation

- ▶ Held between 17th December 2021 to 2th January 2022
- ▶ **No feedback was received**

Site Visit

- ▶ A site visit was carried on the 14th January 2022 at the D3 Power Generation Malta Ltd. and Enemalta plc. An inspection at ElectroGas Malta Ltd. has been delayed to the COVID 19 pandemic.



Permit Structure

Permit Structure retained in the same manner as in IP 0002/07/G

This Permit consists of four main parts which have been structured so as to include:

- **The Regulatory Framework Permit:** addressing the obligations of all operators and coordinating these obligations due to the nature of the facility as a multi-operator installation (IP 00002/21).
- **The Subsidiary permit numbers:**
 - Subsidiary permit 1: IP 0002/21/i addressing ElectroGas Malta Ltd.
 - Subsidiary permit 2: IP 0002/21/ii addressing D3 Power Generation Ltd.
 - Subsidiary permit 3: IP 0002/21/iii addressing Enemalta plc.

Enemalta plc. retained as permit coordinator in the proposed permit

Changes to the Permit; Regulatory Framework Permit

- ▶ Standardization of certain conditions
- ▶ Updating of Improvement Programme items
- ▶ Inclusion of generic and site specific conditions which are applicable to all the Permit Holders.

General conditions; Regulatory Framework Permit

- ▶ Operational Changes
- ▶ Emissions to Groundwater;
- ▶ Discharges to land;
- ▶ Discharges to sewer;
- ▶ Discharges to the marine environment
- ▶ Waste Management;
- ▶ Maintenance of plant and equipment;
- ▶ Odour;
- ▶ Noise monitoring;
- ▶ Environmental Management System and Mutual Auditing;
- ▶ Energy Efficiency
- ▶ Management and TCP
- ▶ Transport of dangerous substances
- ▶ Ozone Depleting Substances & Fluorinated Gases
- ▶ Records, Notifications and Reporting
- ▶ Land and groundwater risk Assessment/ Closure; and decommissioning;

Regulatory Framework Permit

- ▶ National Emissions ceilings
- ▶ Common emissions to the marine water
- ▶ Ecological & sediment monitoring at Hofra Iz- Zghira
- ▶ Noise Monitoring
- ▶ Common emissions to the sewer
- ▶ Land and Groundwater investigations closure and decommissioning
- ▶ Mutual Audits
- ▶ Monitoring committee set-up
- ▶ Air Dispersion Modelling
- ▶ Investigation into odour complaints
- ▶ Safety Studies
- ▶ Accident prevention and control
- ▶ Fire fighting infrastructure
- ▶ Incidents and complaints
- ▶ Greenhouse gas emissions permit
- ▶ Port security documentation as per Port Security Regulations (SL 499. 36)
- ▶ Provision of data and actions related to coordinated reporting with respect to the air dispersion modelling, ambient air monitoring, discharges to the marine environment, noise monitoring and land and groundwater and decommissioning reports

Improvement Programme: Framework Permit (IP 0002/21)

Reference	Requirement	Deadline
5	<p>a) Submission of a revised monitoring methodology proposal based on the results of Site Report 2018-2021 for approval by the Authority including timeframes for implementation</p> <p>b) Submission of the monitoring report</p>	<p>a) Within 12 months from the granting of the permit</p> <p>b) As agreed by the Authority</p>
6	Submission of a Coordinated Outline Decommissioning Plan.	Within 22 months from the granting of the permit
7	Submission of Air dispersion model	Within 3 months from the granting of the permit
8	Submission of marine ecological monitoring method statement	Within 5 months from the deadline for submission of the report as per condition 2.5.34

General changes to the subsidiary Permits

- ▶ Removal of conditions related pre-commissioning phase and commissioning phase which were duly fulfilled were relevant.
- ▶ Simplification of the permit, such that conditions common in all three subsidiary permits were included into the regulatory framework permit
- ▶ Amendment of the permitted emission points to air, including those within scope of the Medium Combustion Plant Regulations.
- ▶ Updates in relation to the Large Combustion Plant Best Available Techniques
- ▶ Standardization of certain conditions
- ▶ Updating of Improvement Programme items

Improvement Programme: ElectroGas Malta Ltd. Permit (IP 0002/21/i)

Reference	Requirement	Deadline
1.	Submission of a method statement showing how the monitoring requirements for CP6 will be sampled and tested. This is to include frequency of monitoring.	Within 2 months of the granting of the permit
	First measurement for the air monitoring as approved by 1(a) above.	Within 4 months of the granting of the permit

Improvement Programme: D3 Power Generation Ltd. permit (IP 0002/21/ii)

Reference	Requirement	Deadline
4	Submission of an outline decommissioning plan	Within 2 months of the granting of the permit

Improvement Programme: Enemalta plc. permit (IP 0002/21/iii)

Reference	Requirement	Deadline
1.	Submission of a method statement showing how the monitoring requirements for CP1 will be sampled and tested. This is to include frequency of monitoring.	Within 2 months of the granting of the permit
	First measurement for the air monitoring as approved by 1(a) above.	Within 4 months of the granting of the permit

Financial Guarantee

OPERATOR	PHASES	AMOUNT (€)	Current TOTAL (€)	Proposed TOTAL (€)
EGM	Operational	3,000,000	3,000,000	3,000,000
D3PG	Operational	1,000,000	1,000,000	1,000,000
Enemalta	Decommissioning and Dismantling	2,500,000 (to be released)	3,500,000	1,000,000
	Operational	1,000,000		
Enemalta (co-ordinator)	Framework Permit	1,000,000	1,150,000	1,150,000
	Air Monitoring	150,000		

Annual Fees

Operator	IPPC Application	Rate	TOTAL
EGM	€ 29,260	5% As All Operators are ISO certified	€ 1,463
D3PG	€ 23,650		€ 1,182.50
Enemalta	€ 32,120		€ 1,606

Workings.

Annual fee	10% x initial application fee 5% x Application fee (when ISO certified)
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All Application fees and annual fees (until 2022) have been PAID

ERD Recommendation

- ▶ Based on
 - ▶ The submissions by the operators;
 - ▶ Recommendations by the Regulatory Consultees

The Environment Resources Directorate recommends the **GRANTING** of this permit for a period of **4 years** subject to the following:

For ElectroGas Malta Ltd.:

Submission of a bank guarantee of € 3,000,000 covering the obligations of Subsidiary Permit 1 and operator specific conditions in the Framework Permit.

For D3 Power Generation Ltd.;

Submission of a bank guarantee of € 1,000,000 covering the obligations of Subsidiary Permit 2 and operator specific conditions in the Framework Permit.

For Enemalta plc.;

Submission of a bank guarantee of € 1,150,000 covering Permit Coordinator requirements in regulatory framework permit

Submission of a bank guarantee of € 1,000,000 covering the obligations of Subsidiary Permit 3 and operator specific conditions in the Framework Permit.