

Stefan Calamatta
Executive Director Energy Trading & Dispatch
Energy Trading & Dispatch Department
Enemalta plc
Marsascala

Date: 12th January 2024
Our Ref: EA 00001/24

Dear Sir/Madam,

Planning Ref.: N/A

Description Proposal: Temporary Emergency Plant at Delimara Power Station.

Location: Site within the Delimara Power Station, Marsaxlokk.

Environmental Impact Assessment Regulations (S.L. 549.46)
Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44)

Reference is made to the Project Description Statement (PDS) received on 3rd January 2024.

I. BACKGROUND

1. Introduction and site context

In view of the high increase in electricity demand especially during the seasonal peaks in winter (mainly in January and February) and in summer (mainly between June and September), Enemalta are proposing the installation of a Temporary Emergency Plant at the Delimara Power Station (DPS) in Marsaxlokk for immediate operation. The plant will be ready for dispatch and used in emergency situations, when one of the country's principal electricity supplies fails during peak demand, effectively eliminating the redundancy to the energy generation potential.

Prior to the choice of site, alternative locations having the potential to accommodate such plants in short term, were considered by Enemalta. Four sites, based on a set of criteria and risks, were identified in the PDS. These include the Marsa Power Station, Hal Far, Maghtab and the Delimara Power Station (DPS).

The Plant will consist of two unused parcels of land within the DPS each consisting of modular components made of portable equipment; in this case 40-foot mobile containerized solutions for diesel-based generator sets known as Genset, each generating 30 MWe (total of 60MWe for both sites). These diesel-based generator set consists of a diesel engine and an alternator which is used to convert chemical energy into heat energy through a combustion engine; into mechanical energy that

spins the alternator, converting the mechanical energy into electrical energy through the electromagnetic induction. Their operation will not exceed 500 operating hours per year (as rolling average over a period of three years). The containers are according to ISO standard and will be equipped with a sound attenuation enclosure to reduce noise emissions as well as to protect from the natural elements and the environment. The modular components of the proposed installation consist of portable equipment to ease installation and expedite commissioning (as explained below).

There will be two sites within the DPA. Site 1 (see Figure 1) which is located within the former Phase D1 power plant, measures approximately 61m x 60m for a total area of circa 3,660m² and is located on the former Phase D1 power plant. Site 2 (see Figure 2) measures approximately 70m x 45m for a total area of circa 3,150m² and is located west of Phase 2B power plant, northwest of Phase 3 and south of the Delimara power station central control room. Both sites are accessed directly via Triq il-Power Station from the locality of Marsaxlokk, and located beneath Triq Delimara, within the area known as *L-Inġinier* and *Ras iċ-Ċagħaq*.

The following are the environmental designations relevant to the project:

- *Il-Ballut ta' Marsaxlokk*, which is a Special Area of Conservation located at a distance of approximately 600m - MT 0000014; and
- *Żona fil-Baħar fil-Lbiċ* and *Żona fil-Baħar fil-Lvant* which are Natura 2000 site Special Protection Area located at a distance exceeding 2km from the project site - MT0000111 and MT0000108, respectively.

2. Site History

The DPS site has been subject to multiple planning applications, however the following two applications are specific to the proposed sites:

- *Site 1*: PA02053/10: Boiler conversion for emission reduction at Delimara Power Station – Approved
- *Site 2*: PA 05166/93: Phase IIA Phase IIB Fuel Tanks - Withdrawn

The site is also covered by an Integrated Pollution Prevention and control (IPPC) permit by ERA (IP 0002/21).



Figure 1: Site 1 (Source: PDS)



Figure 2: Site 2 (Source: PDS)

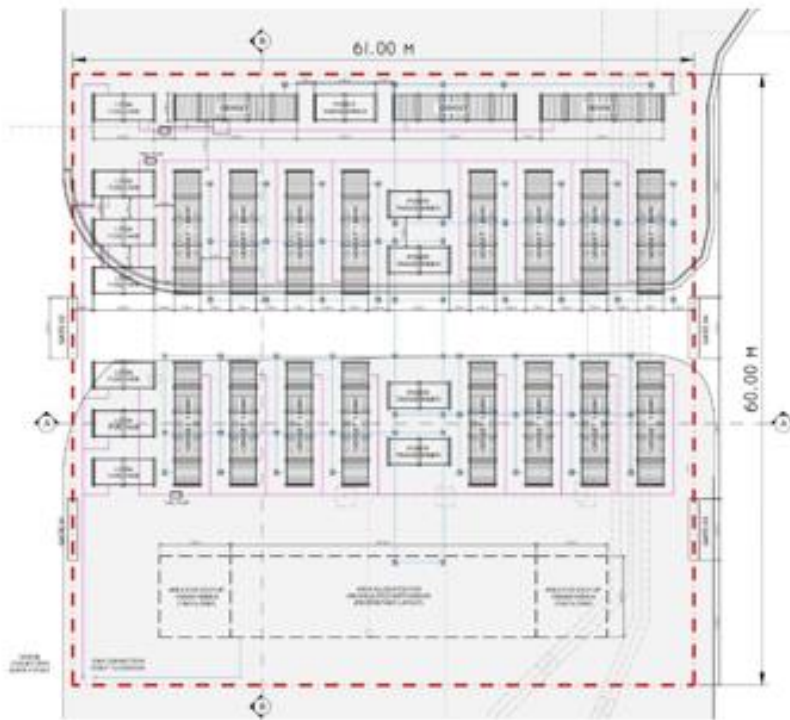


Figure 3: Indicative general arrangement layout of the proposal on Site 1 (Source: PDS)



Figure 4: Indicative general arrangement layout of the proposal on Site 2 (Source: PDS)

3. Screening Criteria

3.1 EIA Screening

(citations refer to S.L. 549.46, except where otherwise specified):

The proposed development falls under within the scope of the Environmental Impact Assessment Regulations, notably in terms of Schedule I, Category I, Section 3.1.1.1: Thermal power stations and other combustion installations with a heat output of 50 megaWatts or more, therefore, the proposal was assessed in line with the EIA Regulations.

3.2 Appropriate Assessment Screening

(citations refer to S.L. 549.44, except where otherwise specified):

The proposal lies in the general vicinity of the following Natura 2000 sites:

- *Il-Ballut ta' Marsaxlokk*, which is a Special Area of Conservation located at a distance of approximately 600m - MT 0000014; and
- *Žona fil-Baħar fil-Lbić* and *Žona fil-Baħar fil-Lvant* which are Natura 2000 site Special Protection Area located at a distance exceeding 2km from the project site – MT0000111 and MT0000108, respectively.

In this regard, the proposal was assessed in line with Regulation 19 of the Flora, Fauna and Natural Habitats Regulations.

4. Documents used for screening

- a. Project Description Statement (PDS) submitted to ERA on 3rd January 2024.

II. ASSESSMENT OF PROPOSAL

5. Assessment of Impacts and Ancillary Considerations

(Screening in terms of Schedule III of the EIA Regulations, S.L. 549.46)

Land and sea use, infrastructure and utilities and landscape character and visual amenity

The proposed development is located within the DPS site in Delimara, Marsaxlokk in an area already used for power generation. Furthermore, the proposed modular portable installations further enable site re-establishment once decommissioned. In view of the type and nature of the installation, no significant environmental impacts are envisaged on land use, landscape character and visual amenity.

The DPS is also accessible by sea through an integrated quay where heavy equipment can be unloaded directly by moored vessels. The proposal will neither encroach the sea nor will require sea water for cooling, thus the installation will not result in any significant environmental impacts on sea/coastal uses.

The proposed site is already physically developed and committed for the generation of electricity, and the DPS is already serviced with the required utilities and infrastructure. The installation will require a 33kV electrical connection to the existing gas-insulated switchgear, a connection to the fuel distribution system via the existing Gasoil pipework and Earthing system, however no major upgrades are necessary. In this regard, no significant effects are expected on utilities and infrastructure.

Terrestrial ecology, agriculture, geology, geomorphology and water bodies

Since the proposed development lies within the footprint of the already existing DPS, no environmental impacts are envisaged vis-a-vis terrestrial ecology, agriculture, geology, geomorphology and landscape. Furthermore, as Site 1 had already been used in the past for power generation, its foundations are still in place.

Due to the nature of the proposal (i.e. mobile containerized generators), no changes are envisaged to the present surface water run-off and storm water drainage system. The proposal does not envisage the use of seawater for cooling purposes and thus will not change the quality of the sea water on either side of the peninsula and therefore the existing sea water cooling inlet and outfall will not be affected. In this regard, the proposed development will not result in environmental impacts on MTC107 marine water body vis-a-vis Water Framework Directive requirement.

Waste Management

The proposal envisages minimal excavation. The units will be manufactured off-site, while assembled and connected on-site, thus the waste generate on-site during the installation phase is expected to be limited.

During operation, any solid wastes which can be generated will be disposed. If the plant will generate any hazardous waste or oils, such together with the quantities will be identified and handled in accordance with the relevant legislative procedures.

Odour and air emissions

In terms of odour, the project is similar to the existing operations within the DPS and will not be in continuous operation, and no specific odour emissions are expected.

During construction, dust generation during site clearance is inevitable, however this is expected to be temporary and not significant relative to the baseline situation. Furthermore, it can be adequately pre-empted through the application of environmentally sound construction practices (such as dust suppression techniques) in line with the Environmental Management Construction Site Regulations (S.L. 552.09) should be followed. During operation, the emission of NO_x to the air from the combustion of diesel from the genset is envisaged. The plant's operation is limited to not more than 500 hours and will only be used during emergency situations should one of the country's principal electricity supplies fails during peak demand. In this regard, no significant environmental impacts are envisaged.

Noise emissions

Any noise generated during the construction and installation phase is envisaged to be temporary, short-term and low in amplitude. To mitigate these impacts, the works during the construction phase will be required to abide with the Environmental Management Construction Site Regulations (S.L. 552.09).

During the operation stage, the diesel engines are expected to generate noise. It is expected that the combined noise emitted by the gensets when in full operation will be around 100dB at 15m from each site. However, in view that each individual diesel generator unit will be individually placed in noise suppression enclosures to reduce generated noise to the surrounding areas, the impact is not considered to be significant.

Access, parking and traffic

Access to the site shall be limited to authorised personnel and through the main gate of the DPS, thus the existing access arrangements will remain unchanged. The same applies to parking. No additional parking requirements are envisaged in view of the nature of the plant.

With regards to traffic, no significant additional traffic is envisaged, thus the proposed plant will not have an impact on or beyond the existing road network leading to the site.

Artificial external light

During operation, the facility is likely to be equipped with light. This may have an incremental impact on avian species, however this is not expected to be significant when considering the existing overall light emissions from the entire DPS site, and that the light emissions through this proposal itself are expected to be minimal. The use of downward-facing luminaires and intelligent lighting solutions, where possible is also recommended. Furthermore, any lighting should be in line with ERA's conditions annexed to this document.

6. Screening In terms of the Flora, Fauna and Natural Habitats Protection Regulations, S.L. 549.44

In view of the nature and scale of the proposal and the distance from the protected sites no significant impacts are envisaged on the Special Areas of Conservation (SAC) and two Special Protection Areas (SPAs) listed in Section 3.2 above.

III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

Environmental Impact Assessment, S.L. 549.46

In view of the urgency of the proposed development, the applicant requested the Authority to apply the exemption under Regulation 5 of the Environmental Impact Assessment Regulations (S.L. 549.46). The nature of the proposal was assessed in line with the same Regulations and it was concluded that the proposal can be favourably considered under said exemption.

Furthermore, based on the information provided in the PDS and on the assessment carried out in Section 5 (above) the proposal is not likely to have a significant impact on the environment and therefore the submission of an EIA is not required.

Flora, Fauna and Natural Habitats Regulations, S.L.549.44

Following consideration of the proposal it has been determined that the proposal will not have significant impacts on the integrity of the habitats, species, and the Natura 2000 site given the location, the nature and scale of the proposal relative to the protected areas in question. In this regard, further assessment in line with the Flora, Fauna and Natural Habitats Regulations through the submission of an Appropriate Assessment (AA) Report is not required.

In view of the above considerations, the ERA recommends the proposal favourably, subject to the conditions in Annex I.

Should you require and clarifications, do not hesitate to contact the undersigned.

Yours faithfully,

Leonora D'Amato
Senior Environment Protection Officer
Environmental Assessment Unit
f/Director Regulatory Affairs

Disclaimer

The above comments are being issued without prejudice to any additional issues which are regulated by ERA through any relevant environmental permitting and, or compliance mechanisms, as well as to any environmental considerations that may be beyond the scope of the application under consideration.

Annex I - Conditions which are to be included in the development permission

General

1. Prior to the commencement of any works on site, the Environment and Resources Authority (ERA)/Compliance and Enforcement Unit is to be formally notified at least five (5) days ahead on: ced.consult.era@era.org.mt.

Permitting

2. The applicant shall submit an application to ERA for the variation of the IPPC permit as well as a new application to cover the medium combustion plants for the operation of the facility.

Installation of infrastructural services underground and trenching works (or similar)

3. New, extended or replacement of infrastructure services (including any required connections to the already existing public supply as well as any extension, renewal or modification of the public supply to serve the site) shall be located underground in appropriate ducts or trenches, duly located within the footprint of the already existing roads/paved areas and other made-up ground. This condition covers all infrastructural services including those related to water, electricity, sewage, telecommunications and other services to be installed on the site or on other land to service the site. No new poles, overhead wiring/cables, pipework or off-street trenching beyond the power station site shall be allowed.

Mitigating light pollution

4. The development shall not be a source of light pollution, especially at night and shall also include all necessary measures to pre-empt adverse impact on the surrounding natural, rural and coastal environment. To this effect:
 - a. lighting shall be strictly limited to within the developed part of the site, and its height and orientation shall be designed in a manner that does not cause illumination beyond the developed site;
 - b. all exterior lighting installed on site shall be horizontally aligned, downward pointing, fully-shielded and full cut-off. No luminaire globes, uplighters and/or high-level floodlighting are allowed; and
 - c. lighting shall be of low-intensity 'warm light' colour with a temperature not exceeding 3000K.

Waste

5. All operations concerning the management of waste are subject to all relevant waste management regulations.

Surface Water Runoff

6. The development shall not be allowed to result in any intended or unintended discharge of polluted surface water, wash waters, operational effluents or overflows, sewage, spillages, seepages or leakages from the development site into the ground or onto any surrounding lands or into the sea.

Removal after cessation of use

7. If at any point the development hereby permitted ceases to operate or is no longer being used for the approved use, it shall be demolished/dismantled and removed from the site, in accordance with a Decommissioning Plan.