



Ref. No 1597/16.08.2010

To:

**The Executive Director of  
Balkan Mineral and Mining EAD, Chelopech  
village, Sofia District**

BMM Ref. No in 0043/August 18, 2010

## STATEMENT

by the Haskovo Regional Environmental Inspection - on the ToR for the Scope of the Environmental Impact Statement (EIS) for the **Investment Project Proposal for Mining and Processing of Auriferous Ores from the Ada Tepe Prospect of the Khan Krum Deposit, Krumovgrad Municipality.**

The ToR for the Scope of the EIS of the Project for **"Expansion of for processing installation of auriferous polymetal ore,** covers all points specified in art.10, par 3 of the Regulation on the Terms and Procedures for Conducting Environment Impact Assessments (promulgated SG, issue 25 of March 18, 2003., amended in SG 29 of April 16, 2010).

The EIS needs to comply with the provisions of art. 12 of the Regulation and the EIS sections covering art.11, par. 1 need to meet the following recommendations of the Haskovo Regional Environmental Inspection as part of the content preparation:

### **I. Regarding the requirements of Chapter Six, of the Environmental Protection Act (EPA):**

#### **1. Water**

The ToR for the scope of work and content of the EIS covers all requirements to the Water section.

#### **2. Air**

The EIA needs to identify the air pollution sources associated with ambient air pollution: point sources, surface and open line sources (as part of the construction process and during the operation phase) at the Ada Tepe prospect, Khan Krum Deposit. Atmosphere pollution sources need to be identified, including all sources and all operation phases.

On page. 22 of the ToR, there is a reference to Regulation 2/1998 "Regulated emission limits (applicable to waste gas) of harmful substances emitted by fixed sources in the ambient air", but that [Regulation] is abolished and therefore the EIS needs to meet the provisions of Regulation 1/2005 on the Regulated Limits of Harmful Substances (pollutants) Emitted in the Air by Sites and Operation of Fixed Sources (promulgated in SG, issue 64/05.08.2005).

#### **3. Waste**

- Considering the total land requirement for the Project implementation, or 98ha and the 57ha total footprint of the facilities to be built, what would be the purpose of the other 41ha?
- The **two streams** of the classification process need to be shown before and after ore screening and gravity-based flotation. *Figure 1 Ata Tepe Flotation Flow Chart* shows only **one** process stream after classification and before the sieve (screening process);
  - Volumes of reagents used in the flotation process:
    - potassium amyl xanthate (PAX);
    - dithiophosphate
    - frother
    - sodium silicate ( $\text{Na}_2\text{O} \times n \text{SiO}_2$ )
    - Sulphidiser: Copper sulphate ( $\text{CuSO}_4 \times 5\text{H}_2\text{O}$ ) etc.;

- Bulgaria has been a member of the EU since 2004, therefore we must meet the provisions of EC Regulation No 1272/2008 *Terms and Conditions for Classification, Packaging and Labeling of Chemical Substances and Preparations (CLP)* and Regulation No 1907/2006 of the EC and the European Parliament date December 18, 2006 *Regulation for Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH)*. List of properties of the chemicals and reagents to be used needs to be provided according to the EU regulations.
- The calculated land requirement for topsoil and earthfill is 50da, while on the other hand the total volume of material to be stored is 120,000m<sup>3</sup>, therefore if the stockpile is 10m high, the footprint requirement for storage will be more than 12 da, which takes us back to the question about the other 38 da;
- Does the volume of 14,630 thousand tons of waste rock include the rock to be removed at the initial excavation works (construction phase), or 320 thousand tons?
- The waste classification as part of the flotation process needs to factor in the mineralization as well as the substances and preparations which will be added for flotation purposes;
- The waste classification needs to be prepared by the contracted construction company or operator (if different companies) and must meet the provisions of Regulation 3/ 2004 *on Waste Classification*;
- Please clarify the discrepancy between these two paragraphs:  
 "Dewatered tailings will be delivered to the (IMWF) cells via pipeline", page 26 and  
 "The co-disposal of waste rock and tailings into IMWF as a waste management method has the following important advantages:  
 - Enables direct recycling of the process waters on the plant site, where the tailings are dewatered;  
 - Reduces the risk of spillage during the tailings delivery process;  
 Reduces the risk of emergencies resulting in a major uncontrolled water discharge during/after a storm event."

#### 4. Soil and earth interior

Sections 7.3 and 7.4 of the ToR for the EIS cover all parameters relevant to and typical of the region in question and related to the mining operation and its rehabilitation.

## **II. Regarding the requirements of art. 31 of the Biological Diversity Act:**

Based on the review of the provided information on the scope of the Compatibility Assessment as part of the EIS, it was established that it meets the requirements of art. 23 of the Regulation on the Compatibility Assessment.

The Assessment needs to be prepared by experts on flora and habitats, invertebrates, fish, amphibian and reptile species, birds and mammals.

The consultation process on the ToR for the Compatibility Assessment needs to also involve the recently established Biodiversity and Ecosystem Research Institute with the Bulgarian Academy of Sciences.

Director, Haskovo Regional  
Environmental Inspection