

REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

0B0C-49 19 February 2019

Subject: Revised Environmental Impact Assessment Report for Investment proposal "Used Oil Recycling Plant", Oltenița, Călărași County

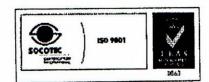
Dear Minister,

Hereby we acknowledge the receipt of a letter from the Ministry of Environment of Romania (No 90104/DM/04.12.2018) giving the Republic of Bulgaria the opportunity to rule on the revised EIA report for the above mentioned investment proposal, informing you of the following:

After considering the information in the EIA Report for the investment proposal "Used Oil Recycling Plant" and consultations conducted with the competent authorities it was found that the expected impact on environment and human health on the territory of the Republic of Bulgaria was not fully clarified, namely:

- 1. The estimated quantities of all waste types to be treated in the installation as well as the waste that will be generated during the plant's operation phase are not determined.
- 2. Regarding the expected noise levels of the installation's operation, more accurate data was not provided and no necessary calculations have been made for the noise levels at the town of Tutrakan for the different parts of the day as requested in our previous letter as of 12 October 2018. It is only stated that the levels will correspond to the noise impact requirements in industrial zones.

H. E. Ms. Gratiela-Leocadia Gavrilescu Vice Prime-Minister Minister of Environment 12 Libertatii Blvd, Sector 5 040129, Bucharest Romania



...

3. With regard to the provided information on hazardous substances that will be in stock on the premises of the company, it is does not also take into account the recommendations we have made. The hazard categories of substances as defined in Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP Regulation) have not been clearly and correctly identified, as in result their respective hazard categories are not reflected.

Given the fact that the location of the site is relatively close (about 1.27 km from the town of Tutrakan and in an unfavorable position to the prevailing winds in the area), the lack of data from the operation of such installations in terms of the possibility of smell separation and given that they may have a negative impact on human health, we find that it is necessary that a public consultation meeting has to be organized for the EIA report complemented by the above-mentioned remarks, on Bulgarian territory in the affected settlement – the town of Tutrakan.

In connection with the above, it is necessary to provide us an amended and complemented EIA report taking into account the above findings. We emphasize that pursuant to Bulgarian environmental legislation, the report should be made publicly accessible to the affected public at least 30 days before the date of the public consultation meeting.

Upon your readiness, with the provision of the revised EIA report, you may suggest a date for a public consultation meeting to be confirmed by us.

I would like to take the opportunity to express my highest consideration and my willingness for fruitful cooperation.

Yours sincerely,

Neno Dimov

Minister of Environment and Water