



REPUBLIC OF BULGARIA

Ministry of Environment and Water

OBOC-49
18 September 2017

Subject: *Investment proposal "Used Oil Recycling Plant", Oltenița, Călărași County*

Dear Ms Gavrilescu,

I would like to refer to your letter № 5503/GLG/13.07.2017 informing us about the Investment proposal "Used Oil Recycling Plant", Oltenița, Călărași.

After considering the information in the Notification of the Investment proposal "Used Oil Recycling Plant" it was found that according to the received documentation the plant is located 1000 m away of the state border between Romania and the Republic of Bulgaria. Due to this fact and due to the installation operation we consider that violation of the air quality standards and/or unpleasant odors are likely to occur on the territory of the Republic of Bulgaria.

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

Based on the above and in compliance with Article 3 of the Convention on EIA in a Transboundary Context we would like to express the willingness of the Republic of Bulgaria to participate in EIA procedure for Investment proposal "Used Oil Recycling Plant", Oltenița, Călărași County.

With regard to the development of the information about the transboundary effect on the Bulgarian territory we consider that the following information should be included:

- 1. Modeling and presenting the results of the expected dispersion and immission concentrations of all possible air pollutants from organized and unorganized sources during the construction works and the operation of the plant as well as the necessary measures that should be undertaken to guarantee that there will not be exceedances of the standard immissions of air pollutants and unpleasant odors on the area of the closest settlement on the territory of the Republic of Bulgaria – the town of Tutrakan, even under the most unfavourable weather conditions (north-northeast winds, which according to the information, are most common in the region);*
- 2. Evaluation of the expected levels of noise and their spatial distribution including on the territory of the Republic of Bulgaria and their comparison with the admissible levels;*
- 3. Description of the possible sources of pollution in the area, which can cause a cumulative effect, mostly concerning the ambient air pollution and evaluation of the expected cumulative effect;*
- 4. The actual emissions that will be emitted during the work of the plant, as well as the way in which they have been calculated. For the purposes of the modeling and its evaluation, the standards for the admissible emissions levels, which the operator should not exceed during the operation of the plant, should be clear.*
- 5. Modeling to determine the maximum single concentrations of the SO₂ and NO_x emissions, as well as the average annual concentrations of the dust emissions with direction of the wind towards the town of Tutrakan on the territory of the Republic of Bulgaria, aiming at consideration of the transborder transfer of these pollutants;*
- 6. Based on the above the risk factors should be identified and depending on the territorial range of the impacts on the environment and if necessary, the number of the potentially affected population and territories and areas and/or sites, subject to health protection on the territory of Bulgaria. It should also be identified the degree of health risk for the population of the town of Tutrakan and measures for its prevention should be suggested;*
- 7. The possible disastrous and emergency situations as well as the territorial range of their consequences and the measures to be undertaken for their prevention and for the elimination of the consequences should be indicated;*

In addition, we would like to point out that if before putting the plant into operation the competent authority in Romania identifies it as one with a high risk potential and if there is potential for a transboundary effect pursuant to article 4 of the Convention on the Transboundary Effects of Industrial Accidents, the Republic of Bulgaria expresses its willingness to participate in the procedure for approval of the Safety Report.

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*