



## REPUBLIC OF BULGARIA

### MINISTRY OF HEALTH

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Ref. No: *MT-002 / 04. 08.2014*

**TO: MR. ALEXANDER CHAKMAKOV**  
**EXECUTIVE DIRECTOR OF**  
**“GRAVEL AND SAND PITS BULGARIA” EAD**  
**BULGARIA, 1528 SOFIA,**  
**at 6, PORUCHIK NEDELCHO BONCHEV STREET**

**COPY: DR. MARGARITA NIKOLOVA**  
**DIRECTOR OF RHI - RUSE**

**Regarding:** *Consultations on the scope and content of the EIAR about investment proposal for “Sand and Gravel Excavation from Alluvium Deposits in the Bed of River Danube, Mishka Section (from km 462.0 to km 459.4) in the area of Babovo village, Municipality Slivo pole, Ruse Region”*

**DEAR MR. CHAKMAKOV,**

In reference to obtained at the Ministry of Health your letter with Ref. No: ИП-00-2 / 08. 07.2014 and attached thereto Terms of Reference on the scope and content of EIAR about investment proposal for “Sand and Gravel Excavation from Alluvium Deposits in the Bed of River Danube, Mishka Section (from km 462.0 to km 459.4) in the area of Babovo village, Municipality Slivo pole, Ruse Region”, we inform you about the following:

From the submitted Terms of Reference about scope and content of the of EIAR it is seen that in the same various sections are envisaged (indicated in letter of HM, outgoing No ИП-00-2 / 22.04.2014 where the health –hygiene aspects of environment and the risk for

human health (for the workers and the population) will be analyzed during the construction phases and the follow-up exploitation of the investment proposal.

We propose for the aforesaid investment proposal, these issues to be reviewed and developed in detail in the following aspects:

1. Complete, exhaustive and well visualized information about the location and the precise distances from the most closely situated settlements and other objects, liable to health protection, pursuant to paragraph 1, item 3 of the Supplementary provisions of the Ordinance on the terms and conditions for conducting of environment impact assessment (SG, issue 25 of 2003, last amendment SG, issue 3 of 2011) to all objects, potential sources of hazard, included in the investment proposal.

2. Data on the production enterprises, functioning on the territory of the Eastern Industrial Zone, town Ruse.

3. The current status of the individual factors and components of environment in the region (atmospheric air, surface and ground water, soils, noise and etc.)

4. Identification of the risk factors, harming human health from the surrounding and working environment during the phases of construction, the following exploitation and decommissioning from exploitation of all objects and equipment, related to the investment proposal.

5. Detailed and exhaustive information regarding the rate of the unfavourable impact on the individual components and factors of environment, paying attention to:

- the future impact on surface and ground water and soils in the region, there from on all water sources, used for drinking and household needs, with or without established sanitary – guarding zone (SGZ), having been affected or likely to be affected, amid the exploitation of the facilities;

- the likely impact on the status of the atmospheric air, by modelling the expected pollution from spot sources and areas sources;

- the expected noise impact, with the accordingly done calculations of the likely noise levels from the activity of:

- the equipment on the borderline of the regulation or residential zone in the most closely situated settlements;
- the facilities at the own pier site, located in the Eastern Industrial Zone of town Ruse, in respect of the most closely located residential zone of the town.

6. Identification of new risk factors and polluters, if such are expected during the realization of the investment proposal.

7. Identification of the potentially affected population and territories, zones and/or objects, liable to health protection, depending on the territorial scope of impact on environment. This has to be done on the basis of the conducted mathematical modeling of distribution and prognostic calculations of the envisaged concentrations and levels of the emitted hazards in the environment.

8. Prognostic assessment of the rate of the expected pollution reduction of environment by individual polluters, as a consequence of the implementation of the new, more high – tech and ecologically viable production processes and equipment.

9. Characteristics of the individual risk factors regarding their impact on human health and their juxtaposition with the effective hygienic standards and requirements, as for the working environment, as well as for the affected residential territories.

Identification of the high priority risk factors for the affected population and the workers on the site shall be carried out;

10. Assessment of the possibilities for combined, complex, cumulative and remote impact of the risk factors, as for the workers, as well as for the subjected to unfavourable impact population, also considering the production activity of other production enterprises in the region of the Eastern Industrial Zone, town Ruse;

11. Assessment of the risk on damaging human health and proposal of measures for health protection and risk management, shall be carried out, if necessary.

Respectfully,

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**Dr. Angel Kunchev**  
*Chief State Health Inspector*

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