



REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

04-00-949 - 36
15 November 2024, Sofia

Subject: *Environmental impact assessment procedure for the project "Construction of a waste to energy plant at the cadastral parcels 1420/1, 1420/4, 1491/1, 1541/1, 1541/2, 1552, 5824/1, 6513/1, 6513/2 on the cadastral map of the town of Prahovo, municipality of Negotin and construction by phases of a non-hazardous waste landfill Elixir Prahovo at the cadastral parcels 2300/1, 1491/1 and 1541/1 - Prahovo, municipality of Negotin, in accordance with the Convention on Environmental Impact Assessment in a transboundary context (ESPOO)*

DEAR MINISTER VUJOVIC,

I herewith confirm the receipt of your letter with reference number Reg. № 002500932 2024/09.10.2024, submitting a supplemented Environmental Impact Assessment Report for the project "Construction of a waste to energy plant at the cadastral parcels 1420/1, 1420/4, 1491/1, 1541/1, 1541/2, 1552, 5824/1, 6513/1, 6513/2 on the cadastral map of the town of Prahovo, municipality of Negotin and construction by phases of a non-hazardous waste landfill Elixir Prahovo at the cadastral parcels 2300/1, 1491/1 and 1541/1 - Prahovo, municipality of Negotin".

After the consideration of the documentation and on the basis of the opinions submitted by the interested and competent authorities, I hereby express the following opinion:

H. E. Irena Vujovic
Minister for the Environment Protection of Serbia
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Regarding the "waste" factor

In the "Notification to the Affected Party of the proposed activity under Article 3 of the Convention", the following information is missing:

- Type of waste by code and quantity, on an annual basis, to be generated during construction, to be treated in the incineration plant and to be generated after incineration;*
- what quantities of waste will be stored on site, per day;*
- the origin of the waste, will there be waste resulting from transboundary shipment and if so, from which countries?*

In view of the fact that a non-hazardous waste landfill is to be built at the installation, it is necessary to specify where and how hazardous waste generated by the incineration process and not eligible for acceptance at a non-hazardous waste landfill will be transferred.

In describing the chosen technology for the thermal treatment of waste, no mention is made of how the requirements of Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) - the Directive, and in particular Article 50(3) - that each combustion chamber of the waste incineration plant be equipped with at least one additional burner will be complied with.

In addition, on the basis of Article 50(4)(c) of the Directive, waste incineration plants and waste co-incineration plants shall use an automatic system that prevents the waste feed whenever continuous measurements show that any of the emission limit values are exceeded due to the upset or failure of the waste gas treatment systems.

Regarding the component „water“:

According to the information provided in the EIA report, the following points are planned for sampling from the Danube River of discharged wastewater from the site:

- PV1: on the Danube 150 m upstream of the wastewater collector inlet with GPS coordinates: N 44°17'27.50" E 22°36'58.08".*
- PV2: on the Danube 100 m downstream of the waste water collector inlet with GPS coordinates: N 44°17'21.08", E 22°37'25.39".*

Measurements at the sites will be carried out 4 times a year.



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The EIA Report for the project addresses the potential impacts on water from the implementation and operation of the project. I support the measures proposed in the EIA Report to prevent, mitigate and compensate as fully as possible for the adverse effects on water and express a positive opinion on the report with regard to the water component, as well as I would like to request the results of the surface water quality monitoring to be submitted to the Ministry of Environment and Water of the Republic of Bulgaria.

Regarding the „ambient air“ component:

The EIA report (1. ENG - EIAS FINAL eng.pdf) on page 401 presents the boiler parameters to be used as input data for the modelling. In Table 6.10 "Characteristics of the boiler plant emitter (W-C14)" a clerical error has been made, a value of 70 Nm³/h is given for the flue gas volume, this should be 70 000 Nm³/h.

In Table 3.49 "Review of the type and maximum concentration of emitted pollutants at the boiler plant emitter", page 251 of the EIA report, the mass flow values of Cd+Tl and Sb+As+Pb+Cr+Co+Cu+Mn+Ni+V need to be revised. Our calculations show that the mass flux values for these pollutants set out in the table are an order of magnitude higher than those that would correspond to the actual maximum emissions.

The modelling results (concentrations of regulated pollutants in the ground layer) show that these will not lead to exceedances of the standards for the protection of human health set out in European and national legislation.

I would like to note that there are no modelling results for emissions of heavy metals - Cd+Tl and Sb+As+Pb+Cr+Co+Cu+Mn+Ni+V.

Regarding human health:



There is no dedicated section in the EIA Report to analyse the potential for transboundary impacts on human health, including accidents with hazardous substances, including health aspects and measures to prevent and mitigate them.

The EIA Report does not sufficiently address the following issues which have the potential for harmful effects in a transboundary context and the relevant sections should therefore be completed:

- Estimated assessment of the potential for the transboundary spread of odours from the activities of the investment proposal.*
- Identification of new risk factors and harmful substances due to cumulative impact of air pollutants in the area after the implementation of the investment proposal.*
- Assessment of the combined, complex, cumulative and remote impact of risk factors in emergency situations and incidents; human health risk assessment and proposal of health protection and risk management measures.*
- Taking into account the envisaged discharges of wastewater into the Danube River, an assessment of the future impact of the implementation of the investment proposal on the surface and groundwater and soils on the territory of the Republic of Bulgaria and hence on all water sources used for drinking and drinking purposes in the affected Bulgarian settlements, with or without an established sanitary protection zone , which are or could be affected as a result of the operation of the facilities.*

A dedicated section, based on the other sections of the EIA report should be prepared, analysing the potential for transboundary impacts on human health and measures to prevent and mitigate them.

The Republic of Bulgaria will express its position after submission of the supplemented EIA report, in line with the comments expressed above.

Please accept, Dear Minister, my highest consideration and readiness for successful future cooperation.

Yours sincerely,

Petar Dimitrov
Minister of Environment and Water