

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	-----------------------	--

1.	MOEW	<p>Изх. № ОВОС-17/11.01.2022 г. TO ██████████ EXECUTIVE DIRECTOR OF BULGARTRANGAZ EAD ██████████ ██████████ COPY: DR ██████████ EXECUTIVE DIRECTOR OF ENVIRONMENTAL EXECUTIVE AGENCY Mr. ██████████, DIRECTOR OF RIOSV-Vratsa MRS. ██████████, Director of the "Danuvian District" Swimming Pool Directorate Mr. ██████████, Mayor of the Municipality of Vratsa Mr. ██████████ MAYOR OF TOWNSHIP S. CHIRENAт ██████████ ██████████</p> <p>Subject: Assignment to determine the scope and content of the environmental impact assessment report (EIA) for the investment proposal (IP) for "Design and construction of new overhead facilities - a compressor station with all its associated technical facilities to ensure reliable and continuous operation in gas injection and extraction modes, as well as a new gas measuring station (GMS), in connection with the expansion of the capacity of the underground gas storage (GSH) "Chiren" and their connection with the existing ones" of "Bulgartransgaz" EAD</p> <p>DEAR MR ██████████ In connection with the assignment received at the Ministry of the Environment and Waters (with entry No. EIA-17/17.09.2021) for the scope, content and form of the EIA report of the above-mentioned IP, according to Art. 10, para. 13 of the Ordinance on the Conditions and Procedures for Environmental Impact Assessment (EIA Ordinance), we express the following opinion:I.</p>	Accepted	
----	------	--	----------	--

Приложение 8.

Reference for conducted consultations in the EIAR procedure of an investment proposal for

"Design and construction of new above-ground facilities - a compressor station with all its adjacent technical facilities to ensure reliable and continuous operation in gas injection and extraction mode, as well as a new gas measuring station (GIS), in connection with the expansion of the capacity of an underground gas storage facility (UGS) "Chiren" and their relationship
with existing ones"

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

	<p>Regarding the requirements of Chapter Six of the Environmental Protection Act (EPA): The presented task for the scope and content of the EIA was prepared in fulfillment of the requirements of Art. 95, para. 2 of the ZOOS and complies with Art. 10, para. 1 and para. 3 of the Ordinance on EIA. Please note that according to Art. 11, para. 1 of the EIA Ordinance, the contracting authority assigns the preparation of an EIA report in accordance with the task, using up-to-date data, modern knowledge and assessment methods.</p> <p>II. By letter ext. No. OVOS-17/16.03.2021, the executive director of "Bulgartransgaz" EAD has been informed that the IP for "Design and construction of new above-ground facilities - a compressor station, with all its adjacent technical facilities to ensure reliable and continuous operation in injection and extraction of gas, as well as a new gas measuring station (GMS), in connection with the expansion of the capacity of the underground gas storage (GSH) "Chiren" and their relationship with existing ones", is unlikely to have a significant negative impact on natural habitats, populations and habitats of species subject to conservation in protected areas, since the territory subject to IP does not fall within the boundaries of protected areas, in the sense of The Law on Protected Areas, as well as within the boundaries of protected areas "Natura 2000 sites", in the sense of the Law on Biological Diversity.</p> <p>In this regard, no impact assessment report (IAC) has been developed as an appendix to the EIA report. We believe that the structure and content of the assignment, in terms of biological diversity, are in accordance with the requirements of Art. 10, para. 3, items 2, 3 and 4 of the Ordinance on EIA and Art. 95, para. 2 of the EPA.</p> <p>We draw your attention to the fact that it is necessary in the EIA report to provide for the development of a Plan for the implementation of the measures under Art. 96, para. 1, item 7 of the EPA, which should include sufficiently feasible and controllable mitigating measures, including for the protection of plant and animal species with a high conservation status. In connection with the above, we inform you that we accept the proposed structure and content of the assignment for the scope and content of the EIA report for the IP for "Design and construction of new above-ground facilities - a compressor station with all its adjacent technical facilities to ensure reliable and continuous operation in gas injection and extraction modes, as well as a new gas measuring station (GMS), in connection with the expansion of the capacity of the underground gas storage facility (GSH) "Chiren" and their connection with the existing ones" in relation to the presented information on protected areas, protected territories and biodiversity.</p> <p>III. In terms of protecting the purity of atmospheric air:</p> <p>We draw your attention to the fact that when determining the expected maximum one-time concentrations of pollutants from some sources, modeling with the direction of the wind from the site towards the village of Chiren (approximate direction 45°) was not carried out. Given the specific circumstances, however, we consider that it is not necessary to carry out additional modeling, since the values of the expected maximum one-time concentrations are significantly below the standards for atmospheric air quality.</p>		
--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

	<p>IV. Regarding the requirements of the waste management legislation: Please note that the amended and supplemented Ordinance No. 1 of June 4, 2014 on the procedure and samples for providing information on waste activities, as well as the procedure for keeping public registers (Official Gazette No. 51 of June 20 2014) was published in the "State Gazette", issue 82 of 01.10.2021. In this regard, it should be borne in mind that reporting is carried out only electronically in the information system maintained by the Executive Agency for the Environment (IAEO)</p> <p>V. With respect to an updated classification notification under Art. 103, para. 5 of the EPA: Given the documentation submitted by "Bulgartransgaz" EAD with entry no. No. EIA- 17/17.09.2021 of the Ministry of Education and Culture, and more specifically updated notification for classification, according to Art. 103, para. 5 of the EPA and an application for the issuance of a complex permit for the "Chiren Underground Gas Storage Facility", with the operator "Bulgartransgaz" EAD, by letter ex. EIA-17/21.09.2021, the same was sent to the executive director of the EEA for an opinion on competence. By letter ext. No. UK- 2919/15.10.2021 of the IAEO, a copy of which we provide you for consideration, the executive director of the IAEO states the following:</p> <p>1. Incorrectly classified as non-appendix No. 3 of the ZOOS waste with a code and name, according to Ordinance No. 2 for waste classification, 13 02 05 - non-chlorinated motor and gear oils on a mineral basis with hazard category E2, 15 02 02* - Absorbents, filter materials (including oil filters not elsewhere specified), wiping cloths, protective clothing contaminated with hazardous substances (oily cleaning materials) with hazard category E1/E2, 16 06 01* - lead storage batteries with hazard category E1/E2, 16 06 02* - Ni-Cd batteries with hazard category E1/E2, 16 07 08* - waste containing oils and petroleum products, with hazard category P5c and/or E1/E2, 20 01 21* - fluorescent tubes and other waste with hazard category H1/H2 and E1/E2.</p> <p>According to Note 5 of Appendix No. 3 of the Environmental Protection Act, in the case of hazardous substances, including waste, which are not covered by Regulation (EC) No. 1272/2008 of the European Parliament and of the Council of 16 December 2008 on the classification, labeling and packaging of substances and mixtures, to amend and repeal Directives 67/548/EEC and 1999/45/EC and to amend Regulation (EC) No. 1907/2006, but which are nevertheless available or likely to be available in an enterprise/facility and possess or may possess, under the conditions established in the enterprise/facility, equivalent properties in terms of major accident potential shall be assigned provisionally to the nearest category or specified hazardous substance falling within the scope of Chapter Seven, Section I of the Environmental Protection Act and the Ordinance for the Prevention of Major Accidents with Hazardous Substances and for Limiting Their Consequences (the Ordinance).</p> <p>As supporting materials regarding the correct and correct filling in of the information, worksheets for the relevant waste can be used, as well as Table 4.1 "Hazardous properties and hazard warning codes" of the Waste Classification Guide (https://www.moew.government.bg/bg/otpaduci/klasificiya-na-otpaducite), where guidance and a link between CLP and the hazardous properties of the waste are presented (for example, Hazard warning -</p>		<p>A corrected and supplemented notification for classification with entry no. No. EIA-17/12.01.2022</p>
--	--	--	--

--	--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>H200 (Unstable explosive), Hazard class and category in Table 3 of annex VI of CLP - Unst. Expl., Hazardous Waste Property - HP 1. Sample guidance documents for this can be found at the following internet address :https://www.mocw.government.bg/bg/prevantivnadcinnost/himiehnivestestva/sevezo/ukazaniva-rukovodstva.2. Information about the fee paid and the date of payment was not submitted, according to item 15 of Appendix No. 1 to Art. 5, para. 2 of the Ordinance, adopted with PMS No. 2 of 11.01.2016 (adopted, amended, SG No. 67/23.08.2019). It is necessary to submit information on the date of payment, according to the Tariff for fees collected in the system of the Ministry of Environment and Water (adopted by PMS No. 136 of 13.05.2011, promulgated SG No. 39/20.05.2011, adopted, amended and supplemented by SG No. 60/07.07.2020). The fee should be paid to the bank account of the IAEO, indicated in their opinion ex. No. 2919/15.10.2021.</p> <p>In view of the above, it is necessary to correct and supplement the classification notice by making a detailed assessment of all hazardous waste stored on the territory of the production site (received and generated), which of them fall within the scope of Annex No. 3 of the EPA and presented the maximum capacity of the sites/facilities where they are stored. The corrected classification notice should be sent, both on paper and electronically, to the MOEW. VI. With regard to the submitted application for the issuance of a complex permit (CR): In view of the need identified by the IAEO to supplement the application submitted by you for the issuance of a KR, we provide you with a copy of the opinion ex. No. 3694/23.12.2021 of the IAEO for the elimination of admitted deficiencies and inconsistencies. The completed application should be submitted to the MOEW as a separate attachment to the EIA report, according to Art. 10, para. 10 of the Ordinance on EIA.</p> <p>VII. The following actions you need to take as an IP outsourcer:</p> <ul style="list-style-type: none"> - - to commission the preparation of an EIA report in accordance with the requirements of Art. 11 and Art. 12 of the Ordinance on EIA; - - to submit the quality of the EIA report to the Ministry of Internal Affairs and Communications for evaluation with a request to issue a decision on the EIA according to the template according to Annex No. 8 of the Ordinance on EIA, to which you should submit one copy of the report under Art. 12 of the same Ordinance and its annexes on paper and on electronic media, including final version of the assignment for the EIA with the above-mentioned notes reflected and with presented results of consultations, in fulfillment of your obligations under Art. 95, para. 3 of the EPA. <p>We remind you that according to Art. 13, para. 2 of the EIA Ordinance, you are obliged to ensure the uniformity of the content in the documentation (the report and all its appendices) on paper and electronic media.</p> <p>Regarding the submitted application for the issuance of a complex permit, we inform you that the same by letter ex. No. EIA-17/21.09.2021 was sent to the Executive Director of the</p>		<p>Information about a fee paid with the submitted corrected and supplemented notification for classification with entry No. OVOS-17/12.01.2022 is presented.</p>

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>Environmental Executive Agency (EIA) for verification of compliance of its content and form with the requirements of the Ordinance under Art. 119, para. 1 of the Zoo. Within 14 days after receipt of the response by the IAEO, you will be notified about it for its consideration in the next actions under the procedure under Art. 94, para. 1, item 9 of the EPA.</p> <p>We inform you that on the basis of Art. 2a, para. 5, item 4 of the EIA Ordinance, the general EIA procedure (including the OS) for the above-mentioned IP is terminated when no EIA report has been submitted for assessment of its quality under Art. 13 of the EIA Ordinance after consultations on the scope and content of the EIA under Art. 10, para. 5 of the same Ordinance.</p> <p>██████████ Minister of Environment and Water</p>		

2.	Environmental executive agency	<p>████████████████████ TO ████████████████████ DIRECTOR OF EOOVOSPZ DIRECTORATE, MOEW</p> <p>n your No. OVOS-17/21.09.2021 Regarding: Additional information required for an application for the issuance of a complex permit at "Bulgartransgaz" EAD, Sofia for the construction of a compressor station at the "Chiren" PGH DEAR MR ██████████</p> <p>On the basis of Art. 10, para. 0 of the Ordinance on the Conditions and Procedures for Environmental Impact Assessment (EIA Ordinance) I am notifying you that the application cited above needs to be supplemented with information from the operator according to the instructions specified in this letter. The completed application should be submitted by the operator in compliance with the requirements of Art. 10, at. 10 of the Ordinance on EIA.</p> <p>General questions</p> <ol style="list-style-type: none"> 1. The declaration of reliability of the data should be revised according to Appendix 2 of the Methodology for filling out an application for issuing complex permits (the Methodology). 2. According to the information presented in the application, during the natural gas extraction regime, an energy product - gas condensate - is obtained. In connection with gases, it is necessary to present information on the implementation of Art. 4 of the ZUO for this condensate. <p>1. NON-TECHNICAL SUMMARY OF APPLICATION FOR ISSUANCE OF COMPLEX RESOLUTIONS</p> <p>A. General information</p> <ol style="list-style-type: none"> 2. On the activity for which an application is submitted 2.1. Ownership <ol style="list-style-type: none"> 1. To submit ownership documents for the entire site for which the issuance of the KR is applied for. B. Summary and Permissions 	Accepted	
----	--------------------------------	--	----------	--


№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

		<p>1. Brief description of the activity for which the application is submitted</p> <p>2. On page 22 of the application, it is stated that after construction and commissioning of the newly designed equipment, the existing equipment at the old site will remain in reserve. At the same time, in the remaining parts of the application (eg Table 1 on page 11) all facilities from the old and new sites are included, stating that the facilities from both sites cannot work together. In this regard, it should be clearly clarified whether the facilities at the new and old sites can work simultaneously or whether their work is technologically limited.</p> <p>3. In the application (Table 1) for the issuance of the KR, it is stated that in the injection mode during the operation of the facilities at the existing site, the simultaneous operation of 5 units of GMC (gas engine compressor) of the requested 8 pieces, and in the mining mode, 2 pieces will work. VK (water heating boiler) and 1 pc. heater for TEG (triethylene glycol) regeneration system when requested 3 pcs. VK. With regard to the planned new site, it is stated that in injection mode, the simultaneous operation of up to 3 units is permissible. GTKA (gas turbine compressor units) from the requested 4 pcs. 2 pcs. VC for technological needs of the requested 3 pcs., and 1 pc. for household needs of the requested 4 pcs. In mining mode, it is indicated that 2 pcs will work. VC for technological needs of requested 3 pcs., 4 pcs. WC for household needs, 1 pc. heater for the TEG regeneration system from the requested 2 pcs. and 4 pcs. gas heaters from requested 5 pcs. In view of the above, as well as in view of the different modes of operation of the facilities at the site, it is necessary to provide information on whether the limitation in the number of operating facilities is technological.</p> <p>4. When presenting the information on the above two issues, the need to recalculate the efficiency norms presented in the application should also be assessed.</p> <p>5. On page 25 of the application, it is stated that an emergency gas unit with a nominal thermal output of 1.67 MW is available on the existing site. and on page 38 it is stated that an emergency diesel generator with a nominal heat output of 1 MW will be available on the site after the implementation of the IP. To present information on the cases in which the reserve capacities will be exploited.</p> <p>6. According to the information presented in the application (pages 11 - 19). part of the facilities on both sites (existing and new) will be spare. To present information on the cases in which the reserve capacities will be exploited.</p> <p>II. Information from the application for the issuance of a complex permit, which will be evaluated by the competent authority issuing the permit</p> <p>1. Use of best available techniques</p> <p>2. The IAEA requested an opinion under Art. 3, para. 2 of the Ordinance on norms for permissible emissions of sulfur dioxide, nitrogen oxides and dust. released into the atmosphere by large combustion plants, in relation to the commissioning (at the new site) of four GTKAs with a nominal input thermal power of 18 MWth each, given that they do not fall under the exception under Art. 3, para. 4 of the same regulation and their capacities can be taken into account for the purposes of calculating the total nominal input thermal power of a</p>		
--	--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

	<p>set of combustion installations. According to an opinion received from the Ministry of Internal Affairs and Communications, the four GTKAs are not considered as a large combustion plant, but as four separate new medium-sized combustion plants. In relation to gases, the facilities at the existing and at the new site do not fall within the scope of a decision on the formulation of conclusions on BAT for large combustion plants, considering which the assessment should be reworked in accordance with item 3.1.3. from the Methodology for determining BAT.</p> <p>3. Use of resources</p> <p>3.1. Raw materials, auxiliary materials and fuels</p> <p>According to the information presented in the application, triethylene glycol and methanol will be used in the mode of natural gas extraction, respectively in drying the gas and in individual separation. In this regard, the same are auxiliary materials directly related to the activity falling within the scope of Appendix No. 4 to the Environmental Protection Agency, therefore it is necessary to present information about the function they perform in the production process, as well as an annual efficiency rate for a product unit .</p> <p>4. Air emissions</p> <p>4.1. Waste gas emissions from point sources</p> <p>On page 38 of the application, it is stated that the "Compressor for KIP Air" will operate filters, dryers and receivers for KIP Air, and the installation will provide purified, dry KIP Air for the needs of the facilities. To provide information about the process that takes place in the "Compressor for KIP Air" and whether emissions to the ambient air are expected.</p> <p>To submit an assessment of conformity of 8 pcs. gas engine compressors with the 1999 Protocol to the 1979 Convention on Long-range Transboundary Air Pollution to Reduce Acidification, Eutrophication and Tropospheric Ozone, given that the application states that there are no applicable emission limits for the same until 2030 Mr.</p> <p>To present information about the principle of operation of 8 pcs. gas engine compressors and 4 pcs. gas turbine compressor units, as well as whether they meet the definitions specified in § 1, item 39 and item 42 of the Additional Provisions of the Act on Clean Air. In case technological passports of the specified facilities are available to be presented.</p> <p>To present information about the principle of operation of the preheaters to the triethylene glycol regeneration systems.</p> <p>To present information on when the facilities at the existing site were put into operation, and specifically 8 nos. gas engine compressors and 1 pc. preheater for triethylene glycol.</p> <p>In some parts of the application, it is stated that 5 units will be installed on the new site. gas heaters, and in other parts of the application it is stated that 5 units will be operated on the site. gas boilers. In this regard, information should be provided as to whether these are the same facilities. In case it is about the same facilities, the record should be uniform in all parts of the application.</p> <p>On page 26 of the application, it is stated that 2 cyclone-type dust collectors will be operated at the site, located at the entrance to the storage facility. Provide information on whether emissions to ambient air are expected from the dust capture process.</p> <p>Impact of emissions of harmful substances on the quality of atmospheric air¹.</p>		
--	---	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>In the presented mathematical modeling with the PLUME software product, various options for operation (in injection mode and in extraction mode) of the facilities located on the two sites (existing and new) are considered, namely:</p> <ul style="list-style-type: none"> - the existing site: in injection mode - the simultaneous operation of 5 pieces of MMC out of the requested 8 pieces and in mining mode - working 1 piece. preheater to the TEG regeneration system and 2 pcs. VC, when 3 pcs. - new platform: in injection mode - the simultaneous operation of up to 3 pcs. GTKA from the requested 4 pcs. and in mining mode - working 1 pc. heater for the TEG regeneration system from the requested 2 pcs. and 4 pcs. gas boilers from the requested 5 pcs. <p>It is indicated that facilities that are not operated during the described modes will be in reserve, therefore they are not included in the modeling. According to the information presented, with this application you are applying for permission to operate the two sites (existing and new) and the facilities installed on them with a total capacity of 123.92 MW. At the same time, in the application, you state that the facilities located on the two sites cannot work together, but it is not clear what the reason for this is, or whether their work is technologically limited.</p> <p>Given that you are applying for permission to operate the two sites (existing and new) and the facilities located on them, the modeling presented in this way cannot provide information on whether the norms for the protection of human health will be respected in the event that other facilities are also operated, except those stated in the indicated modes of operation. Please note that according to the BAT Determination Methodology, the modeling should prove compliance with the norms for the protection of human health, and the same should be done for the worst possible set of circumstances.</p> <p>In the event that the operation of the facilities at both sites is not technologically limited, you should submit a revised mathematical modeling with the PLUME software product to include all discharge devices. In addition, in case you plan to operate the reserve capacities thus claimed together with the other facilities, it is necessary to include them in the modelling.</p> <p>5. Emissions of harmful and dangerous substances in water</p> <ol style="list-style-type: none"> 1. To present complete and comprehensive information about the treatment facilities - sludge oil trap for car wash and treatment facility for the separation process in natural gas extraction. 2. To present information on the presence of priority hazardous substances in waste water (mercury and cadmium). <p>In the case of the presence of the specified pollutants in the waste water, to present information on the measures taken by the operator, for the implementation of Art. 16. para. 6, second indent of Directive 2000/60/EU on the complete or gradual cessation of discharges, emissions and losses of priority hazardous substances.</p> <ol style="list-style-type: none"> 3. On Appendix 6.1 and Appendix 6.2. to indicate the water intakes of the wastewater from the site, as well as all the treatment facilities through which they pass. 4. In item 6.2. from the application it is stated that when cooling waters are discharged. in the event of an accident and/or in case of planned repair works of the boiler installations, their flow is included in the site sewerage for the existing site of the "Chiren" PGH and in the storm sewer for the new IP for the expansion of the "Chiren" PGH. In this regard, to provide information on 		


№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>whether, when the excess cooling water is included in the sewer system, discharge may occur at any of the designated wastewater monitoring points.</p> <p>5. To provide information on whether a waste water flow is generated from the shelling of the tanks at the site. In case such a flow is formed, information on its management should be provided.</p> <p>6. Soil and groundwater protection</p> <p>1. To provide information on whether the sites and/or storage warehouses are connected to the sewage system of the site. In the case of such a connection, full and comprehensive information on the substances and mixtures being stored, as well as the measures to be taken to prevent pollution due to spills, should be provided.</p> <p>2. The baseline report should be revised according to the guidelines of the European Commission regarding baseline reports pursuant to Article 22, paragraph 2 of Directive 2010/75/EU on industrial emissions, available on the website of the Ministry of Environment and Water: https://www.moew.government.bg/static/media/ups/tiny/filebase/Industry/KR/Methodiki/CELEX52014XC050601_BG_TXT-doklad_bazovo_sastoianie.pdf.</p> <p>7. Emergency plans</p> <p>1. To present information regarding the need to develop and/or the availability of an Emergency Plan in accordance with the statutory regulations on disaster protection. With respect,</p> <p></p> <p>CEO</p>		

3.	Environmental executive agency	<p>████████████████████ TO ████████████████████ DIRECTOR OF EOOVOSPZ DIRECTORATE Ministry of Education and Culture</p> <p>On your ex. EIA-17/21.09.2021 At our entrance 1591/21.09.2021 Regarding: The identified deficiencies in the content of the information under Art. 103, para. 3 of the Law on Environmental Protection (ZEO, promulgated SG No. 91/25.09.2002, amended and supplemented SG No. 62/14.08.2015, adopted amend. SG No. 21/12.03.2021) and inconsistencies in the classification carried out according to the criteria under Annex No. 3 of the Environmental Protection Agency in an updated notification for classification under Art. 103, para. 5 of the EPA by the operator "Bulgartransgaz" EAD, Sofia for an enterprise with high risk potential - underground gas storage (GSH) "Chiren". DEAR MR ██████████ In connection with the updated notification for classification (CC) submitted by you under Art. 103, para. 5 of the ZOOS of the above-mentioned enterprise for investment proposal (IP):</p>	Accepted	
----	--------------------------------	--	----------	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

		<p>Design and construction of new above-ground facilities - a compressor station with all its adjacent technical facilities to ensure safe and continuous operation in gas injection and extraction mode, as well as a new gas measuring station (TIS), in connection with the expansion of the capacity of the underground gas storage facility (NGS) "Chiren" and their connection with existing ones" of "Bulgartransgaz" EAD, Sofia", I inform you that during the review of the documentation, the following was found :</p> <p>1. Incorrectly classified as non-appendix 3 of the ZOOS waste with a code and name, according to Ordinance №2 for waste classification, 13 02 05* - non-chlorinated motor and lubricating oils for mineral-based gears with hazard category E2, 15 02 02* - Absorbents, filter materials (including oil filters not mentioned elsewhere), wipes, protective clothing contaminated with hazardous substances (oily cleaning materials) with hazard category E1/E2, 16 06 01* - lead storage batteries) with hazard category E1/E2, 16 06 02* - Ni-Cd batteries with hazard category E1/E2, 16 07 08* - Waste containing oils and petroleum products, with hazard category P5c and/or E1/E2, 20 01 21* Fluorescent tubes and other waste with hazard category H1/H2 and E1/E2.</p> <p>According to Note 5 of Annex No. 3 of the Environmental Protection Act, in the case of hazardous substances, including waste, which are not covered by Regulation (EC) No. 1272/2008, but which are nevertheless present or likely to be present in an establishment/ facility and have, or may have, under the conditions established in the facility/facility, equivalent properties in terms of major accident potential, are temporarily assigned to the nearest category or specified hazardous substance falling within the scope of Chapter Seven, Section I and of The Ordinance under Art. 103, para. 9 of the EPA.</p> <p>As supporting materials regarding the correct and correct filling in of the information, worksheets for the relevant waste can be used, as well as Table 4.1 Hazardous properties and hazard warning codes' of the Waste Classification Guide (https://www.moew.government .bg/bg/otpaduci/klasifikacija-na-otpaducite/), where guidance and a link between CLP and the hazardous properties of the waste are presented (for example, Hazard warning - H200 (Unstable explosive), Hazard class and category in Table 3 of annex VI of CLP - Unst. Expl., Hazardous property of waste - HP 1. Sample guidance documents for this can be found at the following internet address: https://www.moew.government.bg/bg/prevantivna_deinost/himichni_vestestva/sevezo/ukazanivaruководства/</p> <p>2. No information has been submitted about the fee paid and the date of payment, according to item 15 of Appendix No. 1 to Art. 5, para. 2 of the Ordinance on the Prevention of Major Accidents with Hazardous Substances and on Limiting Their Consequences (Ordinance), adopted by PMS N2 of 11.01.2016. (adopted, amended, SG No. 67/23.08.2019). It is necessary to submit information on the date of payment, according to the Tariff for the fees collected in the system of the Ministry of Environment and Water (adopted by PMS No. 136 of 13.05.2011, promulgated SG No. 39/ 20.05.2011, adopted, amended and supplemented by SG No. 60/07.07.2020). The fee should be paid to the bank account of IAEO: IBAN BG47 SOMB 9130 3137 0251 01, Bank code - SOMBBGSF, Municipal Bank AD, Vrabcha branch.</p>		
--	--	--	--	--

--	--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>In view of the above, it is necessary to correct and supplement the classification notification by making a detailed assessment of all hazardous waste stored on the territory of the production site (received and generated), which of them fall within the scope of Annex No. 3 of the EPA and present the maximum capacity of the sites/facilities where they are stored. The information related to the detected deficiencies and inconsistencies in the notification for classification should be requested from the operator/contractor, giving him a period not longer than 10 days. The corrected notification for classification (1 copy on paper and 1 copy on electronic media) should be sent by official means to the EAES within three days from the date of its receipt by the MOEW.</p> <p>With respect,  CEO</p>		

compressor station with all its adjacent technical facilities to ensure reliable and continuous operation in gas injection and production modes, as well as a new gas measuring station (GMS), in connection with the expansion of the capacity of the Chiren underground gas storage and their connection with the existing ones"

I. In the course of the EIA procedure for the aforementioned private property, the BDDR made the following opinions:

- opinion No. G1U-01-128(1)/17.02.2021, on the admissibility of "Design and construction of new above-ground facilities - a compressor station with all its adjacent technical facilities to ensure reliable and continuous operation in compression and extraction modes gas, as well as a new gas measuring station (GMS), in connection with the expansion of the capacity of the underground gas storage facility "Chiren" and their relationship with the existing ones", in relation to the measures and objectives for achieving a good state of the waters laid down in the 2016 - 2021 RAP and the measures to reduce the risk of floods and the adverse consequences defined in the 2016 - 2021 RAP in the Danube region .

II. After reviewing the submitted Terms of Reference for the scope and content of the EIA report of the private enterprise, Design and construction of new above-ground facilities - a compressor station with all its adjacent technical facilities to ensure reliable and continuous operation in gas injection and extraction modes, as well as a new gas measuring station (GIS), in connection with the expansion of the capacity of the underground gas storage facility "Chiren" and their connection with the existing ones, I express the following opinion:

1. The description and analysis of the components and factors of the environment in which it will be implemented and which are likely to be affected by the IP, to be prepared in accordance with the information and predictions of the management plans that are developed/updated by the BDDR.

1.1. According to the currently effective PURB 2016-2021 in DRBU IP falls into the following surface and underground water bodies, as well as water protection zones:

1.1.1. Underground water bodies

Water object	Код на ВТ	Geographical scope	Естествено /CMBT /ИВТ	Environmentally friendly condition/potential	Chemically condition

--	--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments														
		<table border="1" data-bbox="449 347 1371 492"> <tr> <td data-bbox="449 347 554 492">Ogosta</td> <td data-bbox="560 347 732 492">RG10G400R1219</td> <td data-bbox="739 347 940 492">River Fishing from the source to the confluence of the tributary at Lesura incl. Trikladenci</td> <td data-bbox="947 347 1058 492">CMBT</td> <td data-bbox="1064 347 1230 492">good and taller</td> <td data-bbox="1236 347 1371 492">неизвестно</td> </tr> </table> <p data-bbox="449 537 1371 589">Objectives set for environmental protection of surface water bodies until 2027 "Preserving good ecological potential and good chemical status"</p> <p data-bbox="449 597 1371 699">IP is related to water abstraction and use of a surface water body, for which permits have currently been issued, therefore the implementation of IP1 should not have a significant impact on the biological and hydromorphological quality elements and deterioration of the ecological and chemical state of surface water bodies and failure to achieve the se environmental goals.</p> <p data-bbox="449 711 1371 763">With a view to preventing and mitigating the adverse impacts from the realization of the IP, the measures described below are foreseen - part of the Program of measures in the RBMP.</p> <table border="1" data-bbox="449 808 1371 959"> <thead> <tr> <th data-bbox="449 808 684 881">Code</th> <th data-bbox="690 808 1064 881">Name</th> <th data-bbox="1071 808 1194 881">Chemically condition</th> <th data-bbox="1201 808 1371 881">Quantitatively condition</th> </tr> </thead> <tbody> <tr> <td data-bbox="449 886 684 959">BG1GOOOK1AP043</td> <td data-bbox="690 886 1064 959">Karst waters in the Marbel massif</td> <td data-bbox="1071 886 1194 959">good</td> <td data-bbox="1201 886 1371 959">bad</td> </tr> </tbody> </table> <p data-bbox="569 964 909 992">1.1.1.1. Underground water bodies</p> <p data-bbox="449 1040 1371 1092">The goal set for the environmental protection of surface water bodies until 2027 is "Preserving good quantitative status: Achieving and maintaining good chemical status".</p> <p data-bbox="449 1101 1371 1179">According to the information presented, the IPs do not foresee water abstraction which is why no deterioration of the quantitative state of groundwater is expected. Deterioration of the chemical condition is possible in case of possible introduction of pollutants into the groundwater.</p> <p data-bbox="449 1239 1371 1349">2. The measures that will be envisaged to prevent, reduce and as fully as possible compensate the adverse consequences on the environment from the implementation of the IP should include the measures from the management plans and regulatory requirements and restrictions, according to opinion No. PU-01-128(1)/17.02.2021 of the BDDR:</p>	Ogosta	RG10G400R1219	River Fishing from the source to the confluence of the tributary at Lesura incl. Trikladenci	CMBT	good and taller	неизвестно	Code	Name	Chemically condition	Quantitatively condition	BG1GOOOK1AP043	Karst waters in the Marbel massif	good	bad		
Ogosta	RG10G400R1219	River Fishing from the source to the confluence of the tributary at Lesura incl. Trikladenci	CMBT	good and taller	неизвестно													
Code	Name	Chemically condition	Quantitatively condition															
BG1GOOOK1AP043	Karst waters in the Marbel massif	good	bad															

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

2.1. PURB 2016 - 2021 in the Danube region

In order to achieve the planned environmental goals, programs of measures to prevent and reduce anthropogenic pressure (point and diffuse sources of pollution) and impact on water resources, monitoring and control measures, including measures for areas for water protection.

Measures to achieve and preserve a good condition of the waters and the zones for their protection, provided for in the 2016-2021 PURB in the Danube region, which must be observed, and with which the design, implementation and operation of the IP must be complied with are presented in the following tables:

A. Prohibitions and restrictions related to the intended activities

Code on measure	Measure name	Actions to implement the measure	Action code
PM_2	Protection of the chemical state of groundwater from pollution and deterioration	2. prohibition of carrying out activities leading to discharge of hazardous substances into the groundwater	PM_2_2
GDI	Prevention of discharge of priority substances into groundwater	2. Prohibition or restriction of activities that increase the risk of direct or indirect disposal of priority and dangerous substances or other pollutants into groundwater, including the exposure of groundwater to the surface, by seizing the sediments and soils covering the water body.	GD I 2
PM_9	Prevention of the deterioration of the state of the waters from projects and activities at the stage of investment proposals	2. Not allowing the implementation of investment proposals leading to a negative change in the state of water bodies	PM_9_2

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

B. Other measures that should be taken into account when implementing the planned activities

Code on measure	Measure name	Actions to implement the measure	Action code
DP_11	Application of environmental practices or best available techniques to limit discharge of pollutants to groundwater	1. Application of environmental practices or best available techniques to limit discharge of pollutants to groundwater	DPI 11
DP2	Reduction of diffuse pollution from industrial activities	3. Disposal of production waste in accordance with the requirements for waste treatment	DP_2_3

When implementing the IP, the applicable measures should also be taken into account according to the Environmental Assessment Opinion No. 7-3/2016 of the RBMP project to the RBMP 2016-2021 in the DRBU.

- 2.1. 2.1. CIGARS 2016 - 2021 in the Danube region
- 2.2. 2.2. PURN 2016 - 2021 Program contains measures to reduce the risk of floods and the adverse consequences in terms of human health, economic activity, the environment and cultural heritage, with a place of application in RZPR11, outside RZPR11 and for the entire Danube basin management region (DRBU).
- 2.3. 2.3. The IP does not fall into the RZPRN. In the PURN 2016 - 2021, there are no prohibitions and restrictions regarding the implementation of the planned activities.
- 2.4. 2.4. If necessary, all measures outside of the RZPRN and for the DRBU are applicable to the IP, according to Appendix No. 9 to the PURN 2016 - 2021 in the DRBU.

At the moment, activities are being carried out to update the RBMP and PURN, which will be valid for the period 2022 - 2027. As part of these activities, the updating of the objectives for the protection of surface and underground waters, the measures for their achievement, as well as a preliminary flood risk assessment (FRO) and flood threat and risk maps. As a result of the review and update of the NAP in the Danube region, as a stage of the 2022-2027 NAP update process, 35 areas with a significant potential flood risk (RPN) have been determined, incl. the Danube River, divided into nine main tributaries. The RRSP have been approved by the Minister of

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>Environment and Water with Order RD-804/10.08.2021. The planned activities and the realization of the IP, if necessary, should also be taken into account with the stages of updating of the PURB and PURN, resp. environmental objectives, NAP, maps of the threat and risk of floods and the projects of PURB and PURN with a program of measures. The information and documents will be periodically published and publicly available on the BDDR website: www.bc-clunav.org, section "Water Management", subsections "River Basin Management Plan" and "Risk Management Plan from floods 2022-2027".</p> <p>2.5. Regulatory requirements and restrictions</p> <ul style="list-style-type: none"> - The use of water and water bodies is carried out under the conditions and in accordance with Chapter Three of the Water Law (WA), including without violating public interests (according to Article 49 of the Water Law). In order to protect waters and water bodies, it is necessary to comply with the requirements of Chapter Eight of the Civil Code. including the prohibitions of Art. 118a of the same Law. - Currently, Bulgartransgaz EAD is the holder of the following valid permits for: водовземане от повърхностен воден обект №11490001/14.06.2007 г., изменено и продължено с Решение №Вр-1/29.07.2020 г. до 06.05.2025г - за водовземане от язовир "Чирен III"; - discharge of wastewater into surface water bodies No. 13140017/14.06.2007 amended and continued by Decision No. 2623/23.04.2019. until 14.06.2025 - - reinjection No. 12570003/16.12.2015 amended and continued by Decision No. 2757/30.09.2019. until 25.11.2023 <p>In the event that some of the parameters in the currently valid permits are changed, BDDR should be notified of the need to amend the permit. In the event that for the implementation of the planned activities, it is necessary to change any of the parameters of the issued permits, the Holder should take actions according to the requirements of Chapter Four of the Law on Water.</p> <p>According to Art. 46, para. 2 of the Civil Code, the construction of structures, engineering and construction facilities, buildings and others, in which contact with groundwater takes place or is possible, is carried out under the conditions and according to the order of the SDA, in compliance with the requirements for the protection of groundwater according to Chapter Eight of WA.</p> <p>For the protection of water and water bodies and protection from the harmful effects of water, it is necessary to observe the prohibitions in Art. 118a, para. 1, items 2, 3, and 4 of WA.</p> <p>In case of emergencies, creating prerequisites for water pollution, the requirements of Art. 131, para. 1 of WA.</p>		

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		<p>To describe and analyze the impact on surface and groundwater, incl. and the zones for water protection during the implementation and operation of the IP, including and cumulatively:</p> <ul style="list-style-type: none"> - At all stages of the realization (construction and operation) of the IGI, to describe, according to the requirements of the Civil Code and the sub-normative acts for water protection: the need, quantities and ways of supplying water for production and domestic needs; the method of treatment of the separated household-faecal and industrial waste water, incl. pollutants and quantities; the method of treating rainwater; construction of facilities for purification of captured atmospheric waters from the deposit from possible releases and spills of petroleum products - fuels and oils. - To describe and analyze the potential types of impacts and their significance on the state of surface and underground waters. incl. and water protection zones at all stages of implementation and operation of the IP - Given the above, I consider it necessary to assess in the EIA: <ul style="list-style-type: none"> - The impact of the activity on the state of surface and underground waters; - The cumulative impact on the state of surface and groundwater from all existing or permitted impacts in the area; - The achievement of the intended goals for the specified surface and underground water bodies, resp. preservation and prevention of deterioration of surface and underground water bodies. <p>Director of BDDR</p>		

5.	Ministry of energy	<p>Ex. No. E-26-B-566/04.10.2021 TO MR [REDACTED] Executive Director of "Bulgartransgaz" EADHa Baur № 04-09-17(6)/16.09.2021 r.</p> <p>DEAR MR [REDACTED],</p> <p>In response to your letter under the above number received by the Ministry of Energy regarding the holding of consultations to determine the scope and content of the Environmental Impact Assessment Report of the Investment Proposal in connection with the Chiren underground gas storage facility, I am notifying you of the following: The Ministry of Energy has no comments on the Terms of Reference provided to us for the scope and content of the environmental impact assessment for the investment proposal described above.</p> <p>[REDACTED] Deputy Minister of Energy</p>	-	-
----	--------------------	--	---	---

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
6.	Major of the village of Chiren	<p>Ex. No. 45/21.10.2021</p> <p>No objections [REDACTED] - Mayor of the village of Chiren</p>	-	-

7.	Община Враца	<p>Ex. No. 0400-139(3)/28.09.2021 TO Mr. [REDACTED] EXECUTIVE DIRECTOR OF "BULGARTRANGAZ" EAD "[REDACTED]"</p> <p>DEAR MR [REDACTED]</p> <p>In connection with a letter received in the Municipality of Vratsa with No. 0400139(1)/17.09.2021 and No. 0400-139(2)/21.09.2021, for the consultation of the Assignment for the scope and content of the EIAR for an investment proposal: "Design and construction of new above-ground facilities - a compressor station with all its adjacent technical equipment to ensure reliable and continuous operation in gas compression and extraction mode, as well as a new gas measuring station (GIS), in connection with the expansion of the capacity of the underground gas storage facility "Chiren" and their connection with the existing ones" and the presented information, for conducting consultations according to Art. 95. para. 3 of the EPA under the Assignment for determining the scope and content of the EIA report of the abovedescribed investment proposal, we have no comments, suggestions for additions or amendments to the document.</p> <p>Please note that after approval and positive assessment under Art. 96. para. 6 of the EIA, the contracting authority organizes together with the affected municipalities, town halls and regions determined by the competent authority or an official authorized by it, a public discussion of the EIA report in accordance with Article 97 of the EIA.</p> <p>Engineer [REDACTED] Deputy Mayor UT</p>	Accepted	<p>After approval and positive assessment under Art. 96. para. 6 of the EIA, the contracting authority will organize, together with the affected municipalities, town halls and districts determined by the competent authority or an official authorized by it, a public discussion of the EIA report in fulfillment of Art. 97 of the EPA.</p>
----	--------------	---	----------	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	-----------------------	--

8.	Regional Environmental Inspection Vratsa -	<p>TO Mr. [REDACTED] EXECUTIVE DIRECTOR OF "BULGARTRANGAZ" EAD "[REDACTED]"</p> <p>DEAR MR [REDACTED],</p> <p>In connection with the assignment to determine the scope and content of the EIA report submitted by you to the Regional Environment and Water Inspection (RIOSV) - city of Vratsa (with entry No. EIA-EO-271 of 17.09.2021) of the above-mentioned IP, and according to the competences of RIOSV-Vratsa. I provide you with the following opinion:</p> <p>Given that the structure of the task, in principle, follows the requirements of Art. 95, para. 2 and para. 3 of the Environmental Protection Act (EPA) and Art. 10, para. H of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment (EIA Ordinance), REI-Vratsa has no comments on the scope of the EIA.</p> <p>Regarding the content of the EIAR, the inspection has the following recommendations:</p> <p>-Regarding the "Biodiversity" component: During the development of the EIA, the following should be taken into account: During the stage of biological reclamation of the disturbed terrains, during landscaping activities, the use of local plant species should be foreseen, and the use and spread of invasive alien species should not be allowed. More information on the full Union list of invasive alien species under Regulation 1143/2014. which affect the PS after the last changes of 2019" can be found on the website of the Ministry of Internal Affairs and Communications at the following Internet address: https://www.moev.gov.bg/hg/hg/priroda/biologichno-raznoobra/ie/nemeslni-iinvasive-chiidi-vidove/invasive-chuidi-vidovc/ [REDACTED] Director REI Vratsa</p>	Accepted	During the stage of biological reclamation of the disturbed terrains, during landscaping activities, in item 8 of the EIA, it is recommended to provide for the use of local plant species, while not allowing the use and spread of invasive alien species.
9.	Ministry Healthof	<p>Ex. № 26-00-2950/10.11.2021 TO Mr. [REDACTED] EXECUTIVE DIRECTOR OF "BULGARTRANGAZ" EAD "[REDACTED]"</p>	Accepted	The information from the letter was taken into account when preparing item 3, item

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

4, item 5, item 6, item 7 and item 8 of the Environmental Impact Assessment Report

DEAR MR [REDACTED],

In connection with your letter received at the Ministry of Health with No. 26-00-2950/17.09.2021 and attached documentation, with a request for consultations regarding the Terms of Reference for the scope and content of an environmental impact assessment of an Investment Proposal (IP): "Design and construction of new above-ground facilities - a compressor station with all and adjacent technical facilities to ensure reliable and continuous operation in gas compression and extraction mode, as well as a new gas measuring station, in connection with the expansion of the capacity of the underground gas storage "Chiren"4 and their connection with the existing ones with the contracting authority" Bulgartransgaz EAD, we inform you of the following:

By Decision of the Council of Ministers (MC) No. 755 of September 21, 2004, the Chiren gas storage facility was designated as a strategic object of national importance. Based on the prepared in 2009 technological project of the Czech company "MND" for the operation and expansion of the "Chiren" LNG, in 2011 "Bulgartransgaz" EAD accepted the technological project and approved an option for expansion at formation pressure up to 150 bar, volume of active gas - 1 billion m³ (currently 550 million m³) and daily flow rate of injection and extraction up to 10 million m³/day (currently the maximum daily capacity of extraction is 3.82 million m³/day, and of injection - up to 3.2 million m³/day). The subject of the current EIA procedure is the first of the three directions of the expansion project, namely the design and construction of new above-ground facilities - a compressor station (CS) with all its adjacent technical facilities to ensure reliable and continuous operation in compression mode and extraction of d I. as well as a new gas measuring station (GIS).

Due to the scope of the planned construction and installation activity at the new site and the increase in the pumping capacity of the equipment, achieved mainly by a general increase in the power of the used compressor units, as well as due to the upcoming extended operating period, the EIA report should contain comprehensive information on the potential risk factors and assessment of the possible harmful effect of their impact on the quality of individual components of the environment, living and working environment and human health. Счита́ме, че заданието за обхвата и съдържанието на доклада за ОВОС. следва да изисква в доклада да бъде представена информация, анализи и оценки по следните основни въпроси:

1. Complete, comprehensive and well-illustrated information regarding the location and exact distances from the nearest borders of residential areas and other areas and objects subject to health protection in the sense of § 1. item 3 of the additional provisions of the Ordinance on the conditions and the procedure for carrying out an assessment of the impact on the environment (promulgated SG No. 25 of 2003, adopted, amended SG No. 3 of 2011) to all objects, potential sources of harm. included in the investment proposal.

--	--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

		<p>2. The EIA report should contain comprehensive information on the state of the individual components and factors of the environment - atmospheric air, surface and underground water (including water sources for drinking and domestic purposes and mineral water sources and sanitary protection zones around them), soils, etc.</p> <p>2.1 Atmospheric air The analysis of atmospheric air quality should include all the nearest settlements located in the area of the IP. as well as all objects subject to health protection in the sense of § 1. item 3 of the additional provisions of the Ordinance on EIA. The expected emissions of harmful substances during construction, transport and operational activities should not be interpreted in isolation, but should be taken into account with the existing atmospheric air pollution in the specific settlements.</p> <p>Both for the period of construction and for operation, the mathematical modeling of the distribution and surface concentrations of the expected pollutant emissions should also include a variant where there is a combination of maximum production load and the most unfavorable meteorological conditions for dispersion and deposition of pollutants, as well as a study of the cumulative effect with emissions from other industrial facilities in the area. the EIA report, measures to reduce the local impact of the expected dust and gas emissions should be developed in detail.</p> <p>2.2. When assessing the risk of major accidents and/or disasters, the so-called 'worst case scenario'. After the identification of the possible accidents and disasters, the preventive measures and protective barriers that will be provided at the site should be described, as well as conclusions should be drawn about the possible emergency scenarios, including about the defeat zones.</p> <p>2.3. Leads</p> <ul style="list-style-type: none"> - In view of the possibilities of impact of the investment proposal on the quality and safety of the water used for domestic drinking water supply, supplied by aquifer facilities with or without an established sanitary protection zone, the EIA report must include up-to-date information on: - the existing drinking-domestic water supply of the settlements located near the IM - water bodies and water catchment facilities for drinking-domestic water supply, POPs, data on the quantity and quality of water supplied for drinking-domestic purposes to users in accordance with the requirements of Ordinance No. 9/2001 on the quality of water intended for drinking-domestic purposes (Announcement of SG No. 30/28 March 2001, amended and supplemented by SG No. 6/16 January 2018); - analysis and assessment of the possible impact upon the implementation of the IP at the construction and operation stages - impact on the natural water bodies used for water supply to the settlements, impact on the relevant POPs, impact on the supplied quantity and on the quality of water for drinking and domestic purposes among consumers . - availability of aquifer facilities for mineral waters falling within the territorial scope of the IP, the way of using the mineral waters and their purpose, as well as analysis and assessment of the possible impact upon the implementation of the IP at the construction and operation stages 		
--	--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

	<p>on the quantity and quality of the mineral waters regarding compliance with health requirements.</p> <p>2.4. It is necessary to include in the EIA report a reasoned justification that the planned activities at the stages of construction and operation of the IP will not lead to non-compliance with the applicable regulations, such as the regulations on the safety of drinking and mineral waters - Regulation No. 9 and Regulation No. 14 of August 3, 1987 for resort resources, resort areas and resorts (Promulgation of SG No. 79 of 1987. adopted, amended SG No. 70 of 2004), and in cases where mineral water is used for bottling and the Ordinance on the requirements for bottled natural mineral, spring and table waters intended for drinking purposes (Promulgated SG No. 68 of 2004, amended SG No. 66 of 2008), as well as Regulation No. 3/16.10.2008. for research, design, approval and operation of the sanitary protection zones around the water sources and the facilities for drinking and domestic water supply around the water sources of mineral waters. used for medical, prophylactic, drinking and hygiene needs (Official Gazette No. 88/27 October 2000) and the security regimes within the boundaries of the POPs.</p> <p>2.5. Soil Disturbance of the soil cover is mainly related to the excavation works during the construction and installation activities of the site. The EIA report should indicate the locations of the temporary landfills intended to store the humus horizon of the soils, and the removed humus should be used in the reclamation of the disturbed soil. It is necessary to provide specific measures against possible pollution of the adjacent lands as a result of the construction of the individual technological units. This is especially important for the current IP. since a considerable part of the affected lands. as well as the properties in the neighborhood, are of III and IV category and represent an object of intensive agricultural use. The methanol tank with a capacity of 30 m³ should meet the technical requirements, including the presence of a shell of sufficient capacity.</p> <p>2.6. Waste During construction and assembly activities, significant amounts of waste will be released - soil, stones, concrete, iron, steel and other metals, used oils and consumables from construction machines, mixed household waste. The EIA report should include measures for their safe management in accordance with the Waste Management Act and by-laws.</p> <p>2.7. The technology of operation will be related to regular separation of industrial waste. The EIA report must describe all types of waste in a structured manner by groups of hazardous and non-hazardous. which will be generated during the construction and operation of the IP. to assess their impact on the environment and people's health, as well as to foresee work-organizational measures when carrying out repair activities. All replaced technical elements and assemblies should be collected and temporarily stored in designated places until they are removed from the site.</p> <p>2.8. Physical factors It is necessary to develop in detail the sections in the EIA report analyzing the physical factors</p>		
--	--	--	--

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
---	--	---	--------------------	--

in the construction activities and the operation of the IP. considering the following:

- During the construction of additional capacity at the new site of the "Chiren" PGH, 4 gas turbine compressor units (GTCA) are installed. each with a nominal thermal output of 18 MW. At the same time, the distance of the object to the village of Chiren is reduced from 1500 m to about 1200 m. With these changes, it is necessary to study in detail the level of noise that the new gas turbine engines will generate, taking into account the noise from the existing facilities at the work site.

- In order to preserve the noise regime of the inhabited territory, it is necessary:
 - ensure a noise level of 70 dBA within the territory of the enterprise;
 - when calculating the noise reaching the nearest residential buildings in the village of Chiren, yes the norm for settlements, according to item 1 ..Residential zones and territories", must be observed. Table 2 of Appendix 2, to Art. 5 of Ordinance N96/2006 (SG No. 58/2006, amended and supplemented by SG No. 26 of March 29, 2019).

3. Based on the estimated estimates, to identify the risk factors for damage to people's health from the working and living environment during construction and during the operation of the site.

To determine the number of potentially affected population and territories, zones and/or objects with a specific hygiene and safety status and/or subject to health protection, depending on the territorial scope of the environmental impacts.Характеристика на отделните рискови фактори по отношение на въздействието им върху човешкото здраве и съпоставянето им с действащите хигиенни норми и изисквания, както за работна среда, така и за засегнатите жилищни и други територии, подлежащи на здравна защита. Определяне на водещите по значимост рискови фактори.

4. Assessment of the potential for combined, complex, cumulative and remote effects of the identified factors, both for workers and for the affected population.

5. To carry out a health risk assessment and propose measures for health protection and risk management regarding the factors of the living and working environment (water, non-ionizing and ionizing radiation, noise, vibrations, etc.).

6. Analysis of the health and demographic status of the population in the nearest settlements based on current data on the demographic situation (in terms of birth rate, mortality, natural increase, infant mortality, etc.) and morbidity by level and structure. According to data for the last available 3-5 year period. To make a forecast assessment of the impact after the implementation of the investment proposal.

7. Analysis of the health status and occupational morbidity of the employees of the "Chiren" PGH, based on data for past periods from the occupational medicine service serving the facility.

Dr. [REDACTED]

№	Competent Authority / Interested Party	Description of expressed opinions/recommendations/notes, etc.	Accepted/ Rejected	A description of the actions taken to address the comments
		Deputy Minister of Health		