

1. Modeling and presenting the results of the dispersion and concentration of all possible pollutants from organized and non-organized sources during the construction works and the operation of the installation as well as the necessary measures that should be taken to ensure that there is no excess of the air pollution in the nearest area of the territory of the Republic of Bulgaria - the city of Tutrakan, even in the worse weather conditions (North-East winds are the most common in the region):

The Beneficiary has conducted a pollutant dispersion study into the atmosphere that has taken into account all sources of air pollution that may occur during the plant's operating process as well as the worst weather conditions. For modeling the dispersion of pollutants on mediation times of 8 hours, 24 hours and annually a climate database for the last 33 years (1985 - present) developed by the Swiss company Meteoblue AG - Basel, as follows:

- for the 8-hour and 24-hour mediation times, the climatic data for 05.07.2017 (summer), 02.10.2017 (autumn) and 15.01.2018 (winter) have been used;
- for the annual mediation, the climate database corresponding to the calendar year 2017 has been used.

The modeling and presentation of dispersion results include the explanation for each type of pollutant in this study.

2. Assessment of the envisaged noise level and its spatial distribution, including on the territory of the Republic of Bulgaria, and comparison with the admissible levels.

Observance of the sound level within the maximum permissible limits at the limit of the functional area shall comply with the limits imposed as per STAS 10009-88 as follows:

Noise level at the limit of the functional area

- Lech equivalent noise level = 65 dB (A)
- the value of the noise curve Cz = 60 dB

Noise level inside the functional area

- Lech equivalent noise level = 70 dB (A)
- the value of the noise curve Cz = 65 dB

Also, according to Government Ordinance no 6/2006 issued by the Bulgarian Government, the admissible limit for industrial areas is 70 dB.

3. Description of possible sources of pollution in the area which may cause a cumulative effect, particularly with regard to ambient air pollution and the assessment of the expected cumulative effect:

On-site emission sources (internal sources)

Following the analysis of the technical documentation provided by the Beneficiary, the following directed emission sources were identified:

- Technological furnace for thermal fluid heating, with methane gas and process gas operation;
- Technological boiler, running on methane gas;
- Two heat exchangers for heating work areas with methane gas operation;
- Flare, equipped with a continuous operation pilot on methane gas
- Internal road traffic

External emission sources

To estimate the current state by modeling air pollution dispersion of air quality in the area of Oltenita Municipality, the following categories of emission sources were considered:

- Emissions of pollutants from economic activities: technological processes and storage, internal road traffic on the sites of economic operators from neighboring activities;
- Emissions of pollutants from residential and activities and other alike - preparation and heating of food, heating of dwellings and commercial and office premises;
- Emissions from road traffic.

After analyzing the results of the pollutant dispersion calculations resulting from the activities carried out at the Green Oil and Lubes SRL site - waste oil recycling plant, in the context of the cumulative impact, it was concluded that the activities to be carried out on site will have an INSIGNIFICANT impact on the environmental factor AIR.

4. The actual emissions that will occur during plant operation, as well as the manner in which they were calculated. For the purposes of its modeling and assessment, the

standards for the allowable emission levels that the operator should not exceed during the operation of the plant

In the dispersion study, the emissions that can occur during the operation of the plant and how they are calculated, as well as the relation to the limits of the legislation in force are presented.

5. Modeling to determine the unique maximum concentration of SO<sub>2</sub> and NO<sub>x</sub> emissions as well as the annual dust emission in the wind direction to the city of Tutrakan and the territory of the Republic of Bulgaria with a view to taking into account the cross-border transfer of these pollutants

The dispersion study presents the maximum SO<sub>2</sub>, NO<sub>x</sub> and dust emission concentrations depending on climatic conditions (including the direction and speed of winds) and the modeling of each parameter, including on the territory of Tutrakan City.

6. Based on the above, the risk factors should be identified depending on the territorial spread of the impact on the environment and, if necessary, the number of potentially affected people and territories as well as the areas and/ or sites subject to health impact on the territory of Bulgaria. Also, the degree of risk to the health of the Tutrakan population should be identified and measures should be suggested to prevent it

As a result of the dispersion study, the foreseen impact is insignificant, therefore there are no negative effects on the health of the population.

In order to prevent any possible air pollution, the beneficiary has foreseen the implementation of a burnt gas treatment system resulting from the wet scrubber-based thermal fluid heating system (oven), which ensures a guaranteed minimum cleaning output of 95%, so that the SO<sub>2</sub> flow rate taken into account is 3,050 kg/ h.

7. Possible disastrous and emergency situations and the territorial extent of their consequences as well as the measures to be taken to prevent and eliminate their consequences

The possible disasters that may occur in the operation of the waste oil recycling plant are as follows:

- Explosion hazard
- Danger of cracking storage tanks
- Danger of flooding

The activity holder is required to:

- to take all necessary measures to prevent the occurrence of major accidents and to limit their consequences on the health of the population and on the quality of the environment;
- to inform the competent public authorities when a facility, storage unit, nature or quantity of dangerous substances existing on site is changed, at that time, which could have significant effects regarding major accident hazards;
- to provide its own personnel and those who may be affected, in the event of a major accident caused by the objective, information on in-service security measures and actions required for the intervention.
- to immediately inform the territorial public authorities for civil protection and environmental protection in the event of a major accident

The unit must establish an Intervention Plan in case of accidental pollution.

According to the Intervention Plan in case of accidental pollution to combat accidental pollution, the following are established:

- List of critical points in the unit where accidental pollution may occur;
- Potential pollutant sheet;
- Schedule of measures and works to prevent accidental pollution;
- Composition of the team set up to settle internal emergency situations with the responsibilities of the leaders;
- Composition of accidental pollution fighting teams;
- List of facilities and materials required to stop accidental pollution;
- Procedure for recording information on the occurrence of accidental pollution events;
- Alert procedure in case of accidental pollution.

The plan will be reviewed on an annual basis and updated as appropriate.

The plan must be made available to the verification and control bodies at any time within the unit

Operating deficiencies that may have significant effects on the environment must be recorded in written form. Such written records, which must be made available to the responsible authorities, must state:

- The type, time and duration of the fault,
- The amount of harmful substances released (if applicable, an assessment is required),
- The consequences of the malfunction both inside and outside the site,
- All measures initiated.

Faults whose effects can spread throughout the site or which raise health or life threats must be notified

- immediately to the Emergency Situations Inspectorate
- urgently to the authority responsible for environmental protection.

As far as the danger of land flooding is concerned, the unit will raise on the platform the refinery plant and storage tanks so as to exceed the flood rate.

8. Regarding the establishment of the risk degree according to art. 4 of the Convention on the cross-border effects of industrial accidents, the Beneficiary has submitted the SEVESO notification to APM Calarasi and shall receive an answer regarding the establishment of the plant classification and depending on this classification it will be decided the necessity of drawing up the Security Report.