

MOVEMENT FOR GREEN BULGARIA

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TO
Mr. OLLI REHN –
EURO COMMISSAR ON EU
ENLARGEMENT

DEAR MR. REHN,

On behalf of Movement for Green Bulgaria, allow me to inform you as to the environmental situation at the three illegal dumpsites – Trebich quarter, Isskar quarter, Kremikovtsi quarter, and within the territory of Bulgaria's capital city – Sofia, where solid residential waste is being baled and kept since the closure of the waste depot at Suhodol quarter.

Isskar quarter

The baler installations often go out of work. This leads to a buildup of dozens and hundreds tons of unprocessed waste. A large number – over 10 – of standing by waste collection vehicles are crowding in the quarter streets.

Minor fractions are spilled within the site.

Dozens of car tires, construction waste, etc., have accumulated at the site. The installations are a crusher and a magnetic separator for metal waste, and they are not processed by the packaging machine. Also unknown is the location where these are landfilled.

Many of the ready bales have ruptures. The ruptured bales are not repackaged. There are visible spillages, and accumulated leachate beneath the ruptured bales.

Inspections were carried out when the installation was not operating.

The site has not been cleaned; it is not kept clean either.

Organoleptically, unpleasant odors are established at the bale storage area, at the leachate collection shaft, at the solid residential waste readied for processing.

The site is half full with the stored ready bales, it is not known where they will be stored after a month.

There are leachate and waste-water leakages resulting from the washing of the installation.

Winds scatter minor fractions at the site and beyond it.

The installation has operated for at least 2 months without a submitted plan of the existing water supply and sewage network, and without a contract with Sofiiska Voda AD (Sofia Water S.A.) for their discharge into the sewage system.

Whenever the installations at the other two quarters broke down, the site operated under overload on a 24-hour regime, in contravention with the announced technology.

There is no coordination with the Labor Inspectorate as to night work, safety, and healthy working conditions.

Although envisaged to process waste from 8 city areas, it has also processed waste from other city areas – **a total of 12 city areas.**

Instead of being collected and transported to a treatment station, the wastewater and leachate leakages are covered up with sand and gravel.

The site borders on a departmental block of flats of Energosnabdyavane (Electricity Supply Company) and is just 100 m. away from the Isskar River, which is used for agricultural irrigation and tourist attractions, and for fishing. **Our doubts are that the discharge of wastewaters and leachate was done straight into the river.** The leachate leakages adversely affect the residents in the nearby block of flats.

No instructions have been made to the site investor during inspections by the supervisory bodies, apart from a single protocol.

At and around the site, dusting and unorganized emissions from bypassing vehicles have been established. No information is available from metering taken.

The net and polyethylene foil packaging is performed visibly less times than what has been announced in the technology. This results in a number of ruptured bales with leachate leakage.

The separation of the metal, glass, and other wastes is performed manually although the technology designates a crushing system and a metal separator.

The vehicles transporting the ready bales are open, which is harmful to the health and environment wherethrough they pass.

The information in the supervisory bodies' protocols has not been obtained through their own gauges and inspections but by staff working at the site, **which presumes partiality and a probability for false data.**

The ready bales transported to the site from the Trebich quarter site have numerous ruptures even at delivery. **How are they supposed to be stored and transported yet another time?**

There is no concrete shaft for collection of the resulting leachate. No information is available for leachate being collected and transported to a treatment station.

The existing sewage network does not meet the new requirements related to the new activity of the site.

The installation biologically dissolving liquid wastes, which are, nevertheless, abundantly available. **How are these processed and landfilled?**

No areas have been designated for waste generated by the operation of the installation and its servicing equipment: oils, accumulators, tires, leachate. The management of oil and lubrication agents, the storage, recharging, etc., has not been arranged according to the requirements for Fire Prevention and Failure-Free Safety.

The manual waste separation has not been coordinated with the Labor Inspectorate for healthy and safe working environment.

The announced technology involving the water supplement for compacting the bales is not complied with.

There is no coordination of the incoming waste collection machines, with some 10-20 vehicles cramming together, if they cannot be handled, they leave for another site, and when the situation repeats there, they return, **which leads to unhealthy transportation and dispersal of wastes several times, throughout the entire city.**

Kremikovtsi quarter

The site has operated for at least a month and a half with no electronic scales for the incoming quantities of waste.

The available quantities of unprocessed waste, sometimes exceeding 50 tons, stay for days.

The installation often goes out of work. In the event of continuous rain(snow)fall, the access road to the site becomes blocked with accumulated rain waters, and the waste collection vehicle are redirected to other locations for handling.

During inspections, the supervisory bodies have established no dusting with no control metering actually taking place.

The findings of the supervisory body announce absence of ruptured bales, which is contrary to the real situation. **Each inspection, even an outside one, without actually accessing the very site, would establish an availability of ruptured bales, which are further ruptured and spilled by rodents and birds.**

The site has operated for at least two months without a ventilation system, given that the work is performed indoors. No harmful effect was established.

Unpleasant odors reek mainly from the stored bales area, from the leachate collection shaft, from the wastes unloaded for processing, and from the very site within a radius of at least one kilometer.

The metal tank supplied for the leachate is there for decorative purposes only, it has not been installed and utilized until the end of November. Concurrently, leachate freely leaks all around.

Leachate visibly flows and accumulates beneath the bales, as a result of which, the foil beneath them is uplifted with car tires, with sand having been poured in. It is not known where the leachate-soaked sand is subsequently landfilled in order to be replaced.

Within a period of some 2-3 months, just one tank of leachate was transported away. **Where did the remaining leachate flow, given that some 30 thousand bales were prepared (during the period – translator’s note)?**

There are false findings in the supervisory bodies’ protocols – “no wastewaters originate”. It is obvious that the bales are nearly sunk in leachate and wastewater, with a strong, unpleasant odor easily sensed.

3 tanks of wastewater have been transported away by the Water Supply and Sewage S.A. company just during October, however, no contract has been signed clearly stipulating compliance with the hygiene-protective rules. There is no trace of where these waters were transported and under whose instructions.

No investigation was conducted on the site sewage system, and if one was even conducted, no results and steps to be made have been announced.

The inspections have been performed over the course of 30 minutes, whereas the operator filled in the data, which did not come as a result of the supervisor’s inspection.

For quite a while, the site has had no leachate shaft, its construction is forthcoming, the supervisory bodies have established.

The inspection protocols mainly deal with description of the technology announced by the operator.

No area has been allocated for large size waste. E.g., household pieces of equipment, wastes resulting from dismantling of old vehicles. Where are these stored, how and where are they transported for landfill?

The installed equipment is not designated for baling high-humidity or vegetable waste, wastes from kitchens, catering establishments, whereas these are prevalent in number.

The site, although not designated for storage of hazardous waste, receives undoubtedly hospital waste from the Pirogov Emergency Care Center, the Tsaritsa Ioanna Hospital, etc.

The Executive Environmental Agency has not performed a metering of the harmful substances emitted during bale storage.

No information is available for any inspections performed on the diesel electric plant and the storing of fuel-lubrication material by the Fire Prevention and Failure-Free Safety. No system for storing and supplying fuel for working purposes has been set up and approved.

Trebich quarter

The inspections of the supervisory bodies have been performed when the installation was not operational – how could these establish harm and failures to comply?

The installation often goes out of work – the mobile band, the gear-drives – this overloads the installations at the other two quarters.

An accumulation of a large amount of unprocessed waste can be observed – a quantity of over 200 tons on an area of 100 square meters, without this site being designated for storage of waste and bales.

A large number of ruptured bales may be observed. There is no control over whether they are re-baled or not. They are transported ruptured in open vehicles for storage at a site in the Isskar quarter.

The leachate leaks on a foil and not in a container, which would later be brought to a treatment station.

The installation operates concurrently with construction-installation works being performed, which prevents the precise execution of the technology announced by the operator, the schedule for handling waste transporting vehicle, the sending back of the ready bales.

For over 2 months the installation has operated without electronic scales installed for incoming control of wastes received.

The declared concrete fencing of the site has yet to be completed, conditions are thus created for the dispersal of minor fractions.

False data in the protocol of the supervisory body indicate that no pollution outside the site has been established. **The waters visibly accumulating in the nearby agricultural plots have a color and odor different from those of the rain waters.**

Often the protocols of the supervisory bodies would only describe the technology announced by the operator.

Unpleasant smells have been established and localized at the place of waste unloading and where the ruptured bales are stored.

No request has been made to a certified laboratory for emission metering, as per Ordinances No. 9 and No. 14 of the Ministry of the Environment and Waters.

In the event of breakdown, the waste collecting vehicles are not promptly redirected to another site but are being allowed in until the site becomes clogged.

The wastewater is not always collected and transported to a treatment station. Part of it is collected in a metal bunker and once it is filled up, they are poured back into the crusher of the baler installation – once per every 200-300 bales.

Part of the leachate goes into a concrete shaft at the site sewage system. A contract has been concluded with a treatment station but it is not transported away regularly because, allegedly, “the quantities are small”.

The Executive Environmental Agency has not performed a metering of the atmosphere air at the temporary sites due to its pressing working agenda.

The metal wastes separated by a magnet are transported to a site of the Phoenix Elite S.A. company, where a manual separation of metal and residential waste is performed. It is in no way clear whether the hygiene-sanitary norms for such activity are complied with or not.

No electronic scales have been installed for control of incoming wastes.

It is not clear where the water from the washing of the installation nozzles is discharged. Visibly, the wastewater streams down the site instead of being lead away.

Drinking water is used from civil water mains. No information is available for inspections made by a supervisory body as to the consumption suitability of this water, given the rather unhealthy environment at the site.

Water to wash the nozzle and the entire installation is obtained from own water source, which has not been authorized and legalized. It is necessary to obtain a use permit pursuant to the Waters Act.

There is no authorized switchgear kiosk, it is not clear how the site is using electricity – legally or illegally?

The construction of the access road was completed by 21.11.2005. How is it that up to now Traffic Police have allowed and have failed to penalize the site, where heavy-duty vehicles come in and out at a ring road more than a 100 times per day. A situation favorable for traffic accidents has been created.

The site has not been secured against fire creating premises for fires, which happen often at waste landfills – recently in Turkey, Germany – with alarming impact on human health, since the waste bales generate the methane gas, poisonous for man. Next to the administrative building, a tank truck is positioned, with a tank of 30 thousand liters volume, having an installed system for allocation of fuel distributing gun and a hose installed on the tank.

The tank truck has not been secured against potential fuel spillage, and it is designate to store diesel fuel for the electricity-generating machine (diesel electric plant), supplying the baler machine and the administrative building.

Just 12 cubic meters of leachate have been collected and transported away over the course of a month and a half. Was the shaft cleaned, who warrants and supervises that?

According to the technology, the packaging of the bales with net and foil is performed 8-10 times. In reality, no bale is wrapped up more than 3 times.

Having established the above, the active members of the environment protection NGO Movement for Green Bulgaria once again declare their belief that the Bulgarian authorities still fail to deal with the waste crisis in Sofia and have a pressing need for logistical support and immediate help in solving the problem with storing and processing solid residential waste in the one-million people European city that Sofia is.

I wish you a happy celebration of the Christmas holidays and a happy New Year.

Best Regards

Doncho Ivanov
Secretary General of
Movement for Green Bulgaria

19.12.2005
City of Sofia