ANNEX 6

<u>REPUBLIC OF BULGARIA</u>

IMPLEMENTATION PROGRAMME FOR

COUNCIL DIRECTIVE 94/63/EC

on control of VOC emissions resulting from the storage of petrol and its distribution from terminals to service stations

March 2003

CONTENTS

ABBREVIATONS

AAQ	Ambient Air Quality
BAT	Best Available Techniques
BSR	“Bulgarian State Railways” EAD
CAA	Clean Air Act
CLRTAP	Convention on Long-Range Transboundary Air Pollution
DGSAI	Directorate General “State Automobile Inspection”
DGRRI	Directorate General “Railroad inspection”
EU	European Union
EC	European Commission
EAAA	Executive Agency “Automobile Administration”
EAMA	Executive Agency “Maritime Administration”
EARRA	Executive Agency “Railroad Administration”
EEA	Executive Environmental Agency
EIA	Environmental Impact Assessment
EMEPA	Enterprise for Management of Environmental Protection Activities
ELV	Emission Limit Values
IPS	Installation/Installations for Petrol Storage
IPLU	Installation/Installations for Petrol Loading and Unloading
kt	kilotons
MD	Ministry of Defense
MIA	Ministry of Internal Affairs
MOEW	Ministry of Environment and Water
MTC	Ministry of Transport and Communications
NMVOC	Non-Methane Volatile Organic Compounds
NSI	National Statistical Institute
NP	Negotiation Position of Bulgaria (CONF-BG13/01)
RIEW	Regional Inspectorates on Environment and Water
SAMTS	State Agency on Metrology and Technical Surveillance
SASRWS	State Agency “State Reserve and War-time Stocks”
SCBRN	Shipping Company “Bulgarian River Navigation”
SS	Service Station
SR	State Reserve
VRU	Vapour Recovery Unit
VOC	Volatile Organic Compounds

1. INTRODUCTION

The present implementation program covers the activities necessary to implement Directive 94/63/EC on the reduction of VOC emissions resulting from storage and transport of petrol from terminals to service stations (referred further as the "Directive") in Republic of Bulgaria.

1.1 Priorities and goals

The reduction of VOC emissions is among the priorities of the national policy on reduction of emissions of harmful substances released in the ambient air. Depending on the time-schedule for their implementation, the measures intended for this purpose are medium-term and long-term as compared to the measures on reduction of emissions of heavy metals, particulate matter and sulphur oxides (from industrial and traffic activities), most of which are of short-term priority.

The international obligations, assumed by the country within the scope of the Gothenburg Protocol from 1999 under the Geneva CLRTAP are for 15% additional reduction of the total annual VOC emissions in comparison with their level in base year 1990 (from 217 kt per year in 1990 to 185 kt after 2010). Moreover, during the last ten years the VOC emissions resulting from storage and transport of petrol are in the range of 2% of the total national VOC emissions. For example, in 2000 they amount to only 3.5 kt.

Within this context the implementation of the Directive is one of the primary measures for fulfilment of the above mentioned international obligations.

1.2 Legal acts and links with other sectors

The following EU legislation is related to the VOC Directive:

- Framework Directive 96/62/EC on ambient air quality (AAQ) assessment and management

- Directive 1999/30/EC on ambient air quality standards with regard to levels of sulphur dioxide, nitrogen oxides, PM10 and lead in ambient air (First Daughter Directive)

- Directive 2000/69/EC on ambient air quality standards with regard to levels of benzene and carbon oxide (Second Daughter Directive)

- Directive 2002/3/EC relating to ozone in ambient air (Third Daughter Directive)

- Directive 98/70/EC on the quality of motor fuels

- Directive 1999/32/EC relating to the sulphur content in certain liquid fuels.

- Directives 70/156/EEC, 70/220/EEC, 72/306/EEC, 77/537/EEC, 88/77/EEC and 97/68/EC on reduction of emissions of the mobile sources, as amended.

The Bulgarian legislation, related to the transposition of the Directive is considered in section 2.1. below.

1.3 Data sources

The description of the present situation in relation with implementation of the Directive is based on the information and data from RIEW, SAMST, NSI, SASRWS, MTC and other institutions, as well as personal research work of the operators of affected installations.

Other important sources have also contributed with relevant information to the elaboration of the present programme:

- PHARE TWINNING BG 98/IB-EN-01/02 “EU Air Quality legislation” - Technical Report on Task 3 “Directive 94/63/EC on Reduction of VOC emissions”; ADEME, France

- DAC/OECD “Integrated System for continuous monitoring and reduction of VOC emissions resulting from usage of solvents and transport of petrol in Bulgaria” Athens University, Greece 1999

- “Research for development of methods for assessment of VOC emissions resulting from storage, loading and unloading of petrol”, Laboratory for scientific and research work “Environmental technologies and management” at the Technical University-Sofia (contract № 1204-2658/07.11.2000 with MOEW);

- National Plan for Institutional Strengthening of the Administrative Capacity for implementation of the EU Environmental Legislation within the period from 2003 to 2006;

- PHARE Project: Development of Directive-Specific Implementation and Financing Plans for Lithuania; subcontractor AEAT, UK;

- Handbook on the Implementation of EC Environmental Legislation (European Commission).

In addition, the data relating to the affected installations, represented in the next chapters, are based on the detailed information about IPS and IPLU at terminals, owned by “PETROL” Co (the former national fuel distributor). This information is included in the Additional Information CONF-BG 64/01 to the initial NP of Republic of Bulgaria CONF-BG 13/01.

2. PRESENT SITUATION

The administrative structure of Republic of Bulgaria constitutes of two management levels in addition to that of the central government - 27 districts for which governors are appointed by the Council of Ministers (CM) and approximately 270 self-governing municipalities. Each of them both has a department for environmental protection. At the central level MOEW has 15 RIEW, which are responsible for implementation and enforcement of the environmental legislation on the territory of one or two districts.

2.1 Transposition

The Directive 94/63/EC is transposed in Bulgarian legislation through Regulation №16 from 1999 on the reduction of VOC emissions resulting from storage, loading/unloading and transport of petrol **(**State Gazette, issue №75 from 99). The Regulation entered into force on 24.05.2000. This date is considered to be determining for the differentiation of “new” and “existing/operating” installations in the country.

2.2 Competent authorities and stakeholders

The institutions, related to the harmonization of the national legislation with the requirements of this Directive, as well as their implementation and enforcement, are listed in Table №1 below. To facilitate, the responsibilities and functions of the institutions are separated in two different sections (paragraphs). The first paragraph gives their general obligations within the national policy on protection of the environment. The specific competencies regarding the implementation of the Directive are represented in the relevant second paragraphs in the table’s second column.

Table №1

Institution	Responsibilities
MOEW	Carries out the national policy in the field of environmental protection and AAQ management; National competent authority (through its Air Protection Directorate) for the approximation of the Directive; responsible for harmonization of the legislation as a whole, for organization, coordination and control of activities on its implementation and enforcement. When necessary, reports to EC on the process of fulfilling the indicated activities.
EEA (at MOEW)	Maintains and develops the national information/monitoring system and data bases on emissions of harmful substances released in the atmosphere; responsible for the methodological guidance of the RIEW in their activities**;** Organizes and maintains the data base of VOC emissions resulting from storage and transport of petrol, in relation with reporting on the process of the Directive implementation in the country, including emissions from mobile containers (through its Air Monitoring

	Department); Ensures methodologically the measurements and the control inspections, carried out by RIEW (through its Laboratory and Analytical Directorate), i.e. provides the necessary standardization documents, methodologies, guidebooks, etc.
RIEW (at MOEW)	Responsible for implementation and enforcement of the environmental legislation in relevant districts of the country's territory; In charge of implementation and enforcement of the technical requirements of the Directive, referring to relevant stationary sources (terminals and service stations).
MTC	Carries out the national policy as regards development of transport activities and vehicles, and the approximation of the European environmental requirements in this field; Through its executive agencies responsible for approximation with the EC legislation, for application and enforcement of the relevant EU and international requirements for transport of dangerous goods. In charge of the implementation and enforcement of the technical requirements of the Directive regarding the relevant mobile sources (road and rail tankers and vessels).
EAAA (at MTC)	National competent authority for application of the European Agreement for International Road Transport of Dangerous Goods. (ADR) Responsible for application and enforcement of the technical requirements of the Directive concerning the road tankers.
EARRA (at MTC)	National competent authority for the implementation of the Common Rules for International Railway Transport of Dangerous Goods (RID) Responsible for the application and enforcement of the technical requirements of the Directive concerning the rail tankers.
EAMA (at MTC)	National competent authority for implementation of the International Code for Transport of Dangerous Goods along the river Danube Responsible for application and enforcement of the technical requirements of the Directive concerning the vessel used for transport of petrol inland waterways.
SASRWS (at CM)	Carries out the national policy of ensuring the necessary state reserves and wartime stocks. Responsible for bringing its terminals (IPS and IPLU) into compliance with the technical requirements of the Directive.

2.3. Main implementation difficulties

The completed analysis has shown that the implementation of the Directive can be accomplished within the existing administrative structure.

The technical requirements of the Directive did not have analogues in Bulgarian legislation before the entering into force of Regulation №16 (see section 2.2. above). Hence the affected installations have not been subject to similar control by the competent environmental authorities.

In this respect, a decision was taken at Governmental level to strengthen and extend the capacity of RIEW with regard to implementation and enforcement of the requirements of the Directive. For this purpose, between 2003 and 2005 the National Plan for Institutional Strengthening of the Administrative Capacity envisages the recruitment of 30 new experts in RIEW, who will have the responsibility to control relevant target ELV and technical requirements, prescribed by both EU VOC directives (94/63/EC and 1999/13/EC). In addition, the National Plan provides for a set of measures intended for training of the newly appointed RIEW personnel, including through twinning projects and measurement equipment supply.

To ensure the implementation of the requirements regarding mobile containers, the MTC should adopt the relevant regulation on transport of dangerous goods by road, rail and water ways (respectively ADR, RID and etc.).

2.4. Affected installations

All installations and service stations (SS), build up or put into operation after the date of enforcement of Regulation №16, transposing the Directive into Bulgarian legislation, are in compliance with the technical requirements fixed in it. Therefore, in this section of the implementation plan the existing (or operating) installations and service stations in the meaning of the national legislation of Bulgaria are considered in details. If the requiested transition period is granted, it would refer to these very installations (to achieve their compliance with the technical requirements of the Directive). It means that, since there are no terminals (i.e. IPS and IPLU) in the country, built up or put into operation from 01.01.1996 to 24.05.2000, in the scope of the transition period will come, except the existing SS, only a small number of “new” ones in the meaning of the Directive, put into operation during the mentioned period. As a result, the requested transition period does not affect any “new” terminal (for more information regarding the different installations within the scope of the requested transitional period see also CONF-BG 64/01).

In the following description of measures, needed to achieve compliance of every single installation, service station or mobile tanker, all deadlines are in accordance with the announced request for determining a transitional period in the initial NP of the country.

2.4.1. Terminals

The existing terminals, covered by the Directive, are represented in Table №2, allocated in accordance with their throughput (or turnover) and operators, as follows:

Table №2

Operator	Total number of terminals	Throughput [10^3 t/y]			
		Over 50	Over 25	Over 10	Below 10
PETROL AD	19	1	6	1	11
LUKOIL NEFTOCHIM - BOURGAS AD	2	2	-	-	-
SASRWS (State reserve)	4	-	-	1	3
Army and Police	7	-	-	-	7
SCBRN	2	-	-	-	2
Total	34	3	6	2	23
Number of existing terminals after 30.12.2005 (No of terminals for which a transitional period is requested is given in **bold**)	28	3	**6**	**2**	**17**
Year of compliance		2005	2007	2009	2009
Transitional period needed (in years)		-	1	3	3

No later than the end of 2005, 6 small terminals (with total throughput below 10 000 tonnes per year) owned by “PETROL”AD will be decommissioned. With this decommissioning the total number of existing terminals will be diminished to 28. In this relation, the number of the terminals and the deadlines for achieving compliance (respectively – duration of the transitional period needed) are given in Table 2.

As of the beginning of 2003, none of the terminals is in compliance with the technical requirements of the Directive. The requisited for this purpose preliminary investigations were made and the entire reconstruction of the terminals, owned by “LUKOIL NEFTOCHIM – BURGAS”AD (the national refinery) as well as of the largest terminal of “PETROL”AD (the national distributor of fuels) in Illianci, near Sofia is forthcoming. These 3 terminals terminals, with throughput over 50 000 tonnes per year and their IPLU, will be in compliance with the requirements of the Directive till the end of 2005.

Meanwhile, the reconstruction of terminals with medium throughput, e.g. over 25 thousands t/y, will start under the terms of compliance schedule, agreed with “PETROL”AD (according to Art.4 of the Directive). As a result, other 6 terminals of the company, including their IPLU (road and railway loading arms) will be put into compliance till the end of 2007.

Respectively, the remaining 19 terminals (excluding the 6 terminals of "PETROL" AD with capacity below 10 000 t/y, which should be decommissioned towards the end of 2005) with their IPS and IPLU will achieve compliance on the concluding stage of implementing Regulation № 16, i.e. till the end of 2009.

2.4.2. Service stations (SS)

290 new service stations have been constructed or totally renovated from the date of entry into force of Regulation No 16 to the end of 2002. All of them are in compliance with the requirements of the Directive.

The number of existing service stations, operating in the country, allocated in accordance with their throughput and operators are represented in Table №3, as follows:

Table №3

Operator	Total number of service stations	Throughput [m^3/y]			
		Over 1000	Over 500	Over 100	Others
PETROL AD	443	18	93	293	39
SHELL BULGARIA AD	56	56	-	-	-
Other operators	951	243	262	319	127
Army and police	120	-	-	41	79
Total (No of SS for which a transitional period is requested is given in **bold**)	1570	317	**355**	**653**	245
Year of compliance		2005	2007	2009	2009
Transitional period needed (in years)		-	1	3	-

The above data shows that around 16% from a total of 1570 existing service stations are excluded form the scope of the Directive, because of their small capacity. The great part of them is owned by the army and the police, and also by former agricultural co-operations. The remaining service stations will be stepwise upgraded in accordance with the terms, laid down in Regulation №16, as follows:

- the service stations with throughput over 1000 m^3/y, including those situated in residential districts - till the end of 2005,
- the service stations with throughput over 500 m^3/y - till the end of 2007 (i.e. with a one-year transitional period)
- the remaining (653 service stations) service stations, covered by the Directive - till the end of 2009 (i.e. with a three-year transitional period)

For this purpose, "PETROL" AD has worked out and implements a special investment programme, which is a subject to control by RIEW.

The service stations, owned by "SHELL – BULGARIA" AD are in compliance with the technical requirements of the Directive. When accounting the newly constructed and renovated service stations, as well as these falling out of the scope of the Directive, at present the total number of SS complying with the requirements of the Directive amounts to 32% of the total number.

2.4.3. Mobile containers

The number of operating mobile containers, registered in the country, allocated according to their operators is given in the Table №4 below:

Table №4

Operator	Number of mobile containers (MC)	Type of MC			Required number of new ones
		road	rail	vessels	
PETROL AD	130	130	-	-	48
SHELL BULGARIA AD	23	23	-	-	
LUKOIL TRANS	10	10	-	-	2
OMV	12	12	-	-	-
Other operators	189	189	-	-	90
Army and Police	300	300	-	-	45
Total No of SS	534 (incl. SS in compliance with the requirements of the Directive)				-
BSR	75	-	75	-	-
SCBRN	9	-	-	9	-

At present, from all road tankers, only those owned SHELL BULGARIA AD, LUKOIL TRANS and OMV, as well as 3 owned by PETROL AD (48 in total) are equipped for bottom loading and comply with the requirements of the Directive. Meanwhile, as a result of agreements with the operators, by 30.12.2005 at least 100 mobile containers will be decommissioned, and by 30.12.2007 – at least 50 MCs. Thus, the number of mobile containers, for which a transitional period is needed, will diminish to 366, and after 2007 – to less than 316. For these, according to the agreements with the operators, a stepwise replacement with new road tankers (carried out simultaneously with the reconstruction of the loading arms at the terminals) is envisaged for the remaining ones, respectively till the end of 2007 or 2009. As a result, all registered road tankers, used for transport of petrol, will be equipped for bottom loading according art.5 of the

Directive by end 2009. The latter will be guaranteed with the issuance of licences for transport of dangerous goods by SAAA – MTC. Moreover, in consequence of increasing effectiveness of petrol transport, the total number of road tankers will diminish considerably. In reference to the Army, the curtailment of outfits (within the framework of its reorganisation) additionally contributes to this decrease. Within this context in the last column of Table №4 above is given the required number of new road tankers, which will replace the existing ones.

The number of the new mobile containers which will be put stepwise into operation in the years is as follows:
34 – by the end of 2005 (out of which – 12 of PETROL AD and 2 of LUKOIL TRANS);
48 - by the end of 2007 (out of which – 18 of PETROL AD);
103 - by the end of 2009 (out of which – 18 of PETROL AD and 45 of the Army and Police).

The mobile tankers for railway transport are owned by BSR or are owned by certain enterprises and put into transport under a BSR No. Moreover, all operating 75 rail tankers have been upgraded in the last years following the reconstruction of the railway loading facility of ”LUKOIL NEFTOCHIM – BURGAS” AD, accomplished in 1999 by building up appropriate VRU to meet the requirements of the Directive. Their number is enough to ensure this kind of transportation in the future. As a result, at the present moment, all rail tankers comply with the technical requirements for vapour capture and retainment, according to art.5 of the Directive (since, only in this case, the costs for reconstruction are justified and it is not necessary to replace the registered tankers with new ones).

As regards to vessels, the state Shipping Company ”Bulgarian River Navigation” owns 9 vessels for transportation of oil products which are not in operation. Out of these, 2 are “Europe” type and are in compliance with the European standards. The other 7 will be decommissioned and shredded.

3. IMPLEMENTATION ACTION PLAN

3.1. Approach and milestones

The Directive does not require granting of permits to the affected installations for their operation activity. In this connection, the application of its requirements in the country will be carried out through the general approach, including issuing the relevant permits by RIEW and subsequent control to ensure their fulfilment. In addition, with the large operators are agreed programmes for achieving compliance, which are subject to control by MOEW, within the framework of the actual decisions on EIA.

The Directive allows a derogation from its requirements for IPLU within existing terminals with a throughput of less than 10000 t/y and service stations with a throughput a less than 100 m^3/y. In this respect, Regulation №16 to the CAA also provides for these exceptions.

The primary milestones for application of the Directive are given in Table №5 below. The detailed implementation action plan is represented in Section 3.7.

Table 5.

Milestones	**Responsible authority**	**Deadline**
Revision of existing measurement, analysis and testing methods	MOEW	done
Inventory of existing installations and survey to determine possible technical solutions for achieving compliance	MOEW	done
Establishment of appropriate measurement, analysis and testing methods; adoption of implementation guidebooks (for RIEW and operators)	MOEW and MTC	2004
Training of RIEW personnel with regard to implementation and enforcement of the technical requirements	MOEW	2005
Issuing of relevant prescriptions for achieving compliance	RIEW	2004
Beginning of control inspections	RIEW	2006
Achievement of compliance by terminals and SS with high capacities	RIEW	2005
Achievement of compliance by terminals and SS with medium capacities	RIEW	2007
Achievement of compliance by terminals and SS with small capacities	RIEW	2009
Achievement of compliance by all mobile containers used for transport of petrol	MTC	2009

3.2 Competency (distribution of responsibilities)

At present, after the full transposition of the Directive, the competent authorities will be the same such as the currently determined by Regulation No:16 to the CAA. It means that RIEW will issue permits and will control the compliance. Where the installations are subject to e.g. IPPC permits, these will be granted by EEA and controlled by RIEW. If it is necessary, to support RIEW in their control activity, MOEW will enter into agreement with private entities to ensure the technical measurements and tests.

3.3 Administration (administering of the implementation plan)

Regulation №16 to the CAA, transposing the Directive into Bulgarian legislation is agreed with the affected industrial sectors and the other ministries and stakeholders involved in its development. At the same time, it is based on the existing inventory of operating installations, including on an assessment of the compliance status. Based on the conclusions from discussions and the revised inventory, Regulation №16 determines the compliance schedule (laid down also in the transitional period requested by the country).

In the MOEW one person will be appointed and have the responsibility for this Directive and Directive 99/13/EC on VOC emissions of solvents. Meanwhile, the air protection departments at RIEW will be reinforced by two persons to strengthen the control and enforcement of the technical requirements established by the two VOC directives. Necessary training will be provided according to the National Plan for Institutional Strengthening of the Administrative Capacity.

3.4 Technical compliance

The technical compliance of the existing or operating installations and service stations, as well as the registered mobile tankers, is considered in details in section 2.4 above.

Depending on their throughput, the non-complying terminals and service stations will be stepwise reconstructed and driven to compliance till the end of 2005, 2007 and 2009 respectively.

The non-complying mobile containers will be gradually suspended from traffic in parallel of the reconstruction of relevant IPLU at the terminals, depending on the special need for different types of tankers. Because of that, at present, it is difficult to determine the exact number of existing mobile containers, which will be stopped from operation till the end of 2005 and 2007. In any case by 2009 all mobile containers, registered and operating in the country will be equipped for bottom loading in accordance with the requirements of the Directive. This is the deadline when the last IPLU - with low capacity - has to be put into compliance and all loading arms at the terminals have to be equipped for bottom loading.

3.5 Reporting

The national competent authority for implementation of the Directive is MoE, which will make up reports about the course of its implementation in accordance with the relevant reporting requirements. For this purpose MOEW will organize and co-ordinate the activities of other involved institutions (EEA, RIEW, MTC, MD, MIA, etc.).

According to the requirements of the directives 94/63/EC and 91/692/EEC, the reporting will start after the recruitment and training of the relevant new staff in EEA and RIEW is finalized, in relation with control on the observation of the technical requirements and the establishment of a national data base, concerning VOC emissions, i.e. till the end of 2006.

3.6 Transitional periods

In its NP Bulgaria has requested a one-year transitional period for installations and SS following within the “second” category (i.e. with medium capacity) and three-year transitional period for the ones within the “third” category (i.e. with low capacity). The installations and SS from the “first” category (i.e. with high capacity according to the classification in the Directive) will be put into compliance with its requirements before 01.01.2006, i.e. one year before the proposed date for accession to EU. It means that the requested transitional period do not concern them.

The detailed implementation action plan (see section 3.7 below) is made up in conformity with the request for determination of transitional period described above.

3.7. Implementation action plan

Detailed implementation plan concerning administrative establishment and development and bringing the existing installations into compliance with the technical requirements of the Directive is represented in Table №6 below.

When more than one institution is listed, the first mentioned takes the entire responsibility and is the leading one for the application of the relevant measure, including for coordination between activities of the rest institutions.

Table №6.

Requirement	**Activities**	**Responsible authority**	**Control authority**	**Term**
Regulation				
Article 3, Annex 1	Analysis of compliance status of existing installations for petrol storage (IPS) in the terminals	RIEW	MOEW	Done
	Harmonization of legislation	MOEW	CM	Done
	Determination of competent authorities responsible for the implementation and enforcement of the technical requirements and target ELV	MOEW	CM	Done

	Establishing of procedures for control of terminals to ensure their compliance	MOEW	CM	Done
	Development of appropriate technical guidebooks and methodologies	EEA	MOEW	2003
	Achieving compliance of IPS with throughput over 50 000 t/y	RIEW	MOEW	2005
	Achieving compliance of IPS with throughput over 25 000 t/y	RIEW	MOEW	2007
	Achieving compliance of IPS with throughput over 10 000 t/y	RIEW	MOEW	2009
Article 4, **Annex 2**	Analysis of compliance status of existing installations for petrol loading/unloading (IPLU) at the terminals	RIEW	MOEW	Done
	Harmonization of the legislation	MOEW	CM	Done
	Determination of competent authorities, responsible for implementation and enforcement of relevant technical requirements and target ELV	MOEW	CM	Done
	Establishing of procedures for control to ensure the compliance of IPLU at terminals	MOEW	CM	Done
	Development of appropriate technical guidebooks and methodologies	EEA	MOEW	2003
	Achieving compliance of IPLU with throughput over 150 000 t/y	RIEW	MOEW	2005
	Achieving compliance of IPLU with throughput over 50 000 t/y	RIEW	MOEW	2007
	Achieving compliance of the rest IPLU	RIEW	MOEW	2009
Article 5, **Annex 4**	Analysis of compliance status of registered mobile containers (MC) for petrol transport	MOEW and MTC	CM	Done
	Harmonization of the legislation	MTC	CM	Done
	Determination of competent authorities responsible for implementation and enforcement of relevant requirements to MC	MTC	CM	Done
	Establishing of control procedures to ensure the compliance of MC	EASAI DGBSR and SIN	MTC	Done
	Adoption of appropriate guidebooks and methodologies in connection with the control of relevant requirements to MC	EAAA, EARRA and EAMA	MTC	2004
	Decommissioning of the last MC that do not meet the established technical requirements	EAAA, EARRA and EAMA	MTC	2009
Article 6, **Annex 3**	Analysis of the status of compliance of existing service stations	RIEW	MOEW	Done
	Harmonization of the legislation	MOEW	CM	Done
	Appointment of competent authorities, responsible for application and enforcement	MOEW	CM	Done

	responsible for application and enforcement of the established requirements and ELV to the service stations			
	Establishment of procedures for control of the service stations, ensuring their compliance in due time.	MOEW	CM	Done
	Elaboration of appropriate technical guidebooks (for the operators and the control authorities)	EEA	MOEW	2003
	Achieving compliance of the service stations with throughput over 1000 m^3/y and the ones situated in settlements	RIEW	MOEW	2005
	Achieving compliance of the service stations with throughput over 500 m^3/y	RIEW	MOEW	2007
	Achieving compliance of the service stations with throughput over 100 m^3/y	RIEW	MOEW	2009
REPORTING				
Article 10 **(Articles 5 and 9 of Directive 91/692/EC)**	Establishment of procedures for data gathering and reporting on emissions, resulting from loading and unloading of mobile containers and their status of compliance with the requirements of the Directive (including on the results from periodical control checks)	MTC	CM	2004
	Establishment of overall procedure for reporting on results of implementation of the Directive, including on emissions from stationary sources (terminals and service stations) and their status	MOEW	CM	2004
	Reporting in accordance with the requirements of the Directive	MOEW	CM	2006

4. IMPLEMENTATION COSTS

The costs for implementation of the Directive include the investment costs for achieving compliance of the existing installations and vehicles or their replacement with new ones, the additional operating costs resulting from reconstruction/replacement, as well as administrative costs for employment of additional staff and training the competent authorities.

The necessary investments are determined separately for each group of installations by the current prices valid at the moment of the programme's elaboration (end 2002).

The annual investment costs, estimated for groups of operators, in each year of the considered period, are calculated using a standard formula for annual payment schedule over the life* of the equipment at 7 % rate of interest. The life of equipment is assumed to be 20 years for the reconstructed or new installations and 7 years for the mobile containers.

The additional annual operating costs related to maintenance, electricity, salaries, etc., are estimated at 5% of annual investment costs amount. These refer solely to the terminals and service stations and are not calculated over the costs for purchasing new road tankers.

The costs for strengthening the administration include a lump sum of 4000 BGL for establishing each new work place and annual salary and insurance expenses to amount of 7000 BGL per employee for 2003. It is assumed that the annual staff expenditures increase by 5% and that the supplementary recruited personnel will be engaged at average of 50% during the first year of the period.

In addition, 50 000 BGL are provided for training the inspectors for the period till 2006.

The account of the compliance costs calculated in BGL for each group of economic operators are represented in Table № 7

The total annual implementation costs within the period 2003-2010 are estimated at 74 million BGL. The total amount of the necessary investments for the same period runs up to 142 million BGL.

The investment plan for the implementation of the Directive is given in Table № 8. The plan does not stipulate external financing to ensure the required investments. It is assumed that the operators of the relevant terminals and service stations as well as the transport companies will provide the compliance investments. The investments needed to apply the requirements of the Directive at Army, Police and State Reserve will be shared equally between the state budget and the Enterprise for Management of Environmental Protection Activities (former NEPF). All expenditures are presented in BGL till the end of 2002 and are re-computed in EURO at conversion rate 1.954 BGL for 1.00 EURO.

Table 7. Summary of the costs of implementing the Directive 94/63/EC in the period till 2010

№	Description of investments/ costs	Order	Years 2003	2004	2005	2006	2007	2008	2009	2010	Summary value
I. Administrative costs											
1.1.	Employment of additional staff	*thousand BGL*	120	112	118	123	130	136	143	150	1032
1.2.	Training	*thousand BGL*	10	15	15	10					50
II. COMPLIANCE COSTS											
OPERATORS:											
2.1.	**PETROL**										
2.1.1.	Investments, including:	*thous.BGL*	3384	3390	3390	14030	14035	16960	16960		72149
	terminals	*thous.BGL*	1800	1800	1800	10800	10800	13500	13500		54000
	service stations	*thous.BGL*	84	90	90	230	235	460	460		1649
	mobile tankers	*thous.BGL*	1500	1500	1500	3000	3000	3000	3000		16500
2.1.2	Annual investment costs	*thous.BGL*	456	913	1370	2967	4566	6440	8315	8315	33341
2.1.3	Additional operating costs	*thous.BGL*	9	18	27	79	131	197	263	263	985
2.2.	**LUKOIL**										
2.2.1.	Investments, including:	*thous.BGL*		6900	7500						14400
	terminals	*thous.BGL*		6900	6900						13800
	service stations	*thous.BGL*									
2.2.2.	mobile tankers	*thous.BGL*			600						600
2.2.3.	Annual investment costs	*thous.BGL*		651	1414	1414	1414	1414	1414		7721
	Additional operating costs	*thous.BGL*		33	65	65	65	65	65	65	423
2.3.	**OTHER OPERATORS**										
2.3.1.	Investments, including:	*thous.BGL*	3486	3486	3486	5155	5155	5120	5156		31044
	service stations	*thous.BGL*	486	486	486	655	655	620	656		4044
	mobile tankers	*thous.BGL*	3000	3000	3000	4500	4500	4500	4500		27000
2.3.2.	Annual investment costs	*thous.BGL*	603	1205	1808	2704	3601	4495	5392		19807
2.3.3.	Additional operational costs	*thous.BGL*	2	5	7	10	13	16	19	19	91
2.4.	**SRWS**										
2.4.1.	Investments (only for terminals)	*thous.BGL*				1700	1700	3600	3600		10600
2.4.2.	Annual investment costs	*thous.BGL*				160	321	661	1001	1001	3143
2.4.3.	Additional operating costs	*thous.BGL*				8	16	33	50	50	157

№	Description of investments/ costs	Order	Years 2003	2004	2005	2006	2007	2008	2009	2010	Summary value
2.5.	**Army and Police**										
2.5.1.	Investments, including:.	*thous.BGL*				2100	2400	11780	14184		30464
	terminals	*thous.BGL*						7200	9600		16800
	service stations	*thous.BGL*						80	84		164
	mobile tankers	*thous.BGL*				2100	2400	4500	4500		13500
2.5.2.	Annual investment costs	*thous.BGL*				390	835	2357	4106	4106	11794
2.5.3.	Additional operating costs	*thous.BGL*						34	80	80	194
2.6.	**SCBRN**										
2.6.1.	Investments (only for terminals)	*thous.BGL*						1800	1800		3600
2.6.2.	Annual investment costs	*thous.BGL*						170	340	340	850
2.6.3.	Additional operating costs	*thous.BGL*						8	17	17	42
	TOTAL INVESTMENTS, including:	*million BGL*	**7**	**14**	**14**	**23**	**23**	**39**	**42**	**0**	**162**
	Public inv. (SRWS, Army and Police)	*million BGL*	0	0	0	4	4	15	18	0	41
	Private investments	*million BGL*	7	14	14	19	19	24	24	0	121
	Total annual investment costs	*thous.BGL*	1059	2769	4591	7636	10737	15537	20567	13761	76656
	Additional operating costs	*thous.BGL*	11	55	99	162	225	354	494	494	1894
	TOTAL COSTS	*thous.BGL*	**1070**	**2824**	**4690**	**7798**	**10962**	**15890**	**21061**	**14255**	**78550**

Table 8. Financing plan of investments for the Directive 94/63/EC

		Year							
	unit	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**
GDP	million BGL	**35 287**	**38 431**	**41 797**	**44 848**	**48 211**	**51 827**	**55 714**	**59 893**
GDP increase	%	**4,72**	**5,41**	**5,26**	**4,30**	**4,50**	**4,50**	**4,50**	**4,50**
Inflation	%	**3,5%**	**3,5%**	**3,5%**	**3,0%**	**3,0%**	**3,0%**	**3,0%**	**3,0%**
Financing									
National financing	million EURO	3,5	7,1	7,4	11,8	11,9	20,1	21,3	
National financing	million BGL	6,9	13,8	14,4	23,0	23,3	39,3	41,7	
State budget – reconstruction of terminals	million EURO				1,0	1,0	3,9	4,6	
State budget – reconstruction of terminals	million BGL				1,9	2,1	7,7	8,9	
Environmental Activities Management Enterprise	million EURO				1,0	1,0	3,9	4,6	
Environmental Activities Management Enterprise	million BGL				1,9	2,1	7,7	8,9	
Private investment	million EURO	3,5	7,1	7,4	9,8	9,8	12,2	12,2	
Private investment	million BGL	6,9	13,8	14,4	19,2	19,2	23,9	23,9	
National financing as % of GDP	%	0,019	0,036	0,034	0,051	0,048	0,076	0,075	0,000
Total costs for investments	million EURO	3,5	7,1	7,4	11,8	11,9	20,1	21,3	
Total costs for investments	million BGL	6,9	13,8	14,4	23,0	23,3	39,3	41,7	
Total cumulative investment costs	million EURO	3,5	10,6	17,9	29,7	41,6	61,7	83,0	83,0
Total cumulative investment costs	million BGL	6,9	20,6	35,0	58,0	81,3	120,6	162,3	162,3