



2013 EMISSIONS FROM CURRENTLY **OPERATING PLANTS**

S0₂ 400mg/Nm³ NO_x 500mg/Nm³ DUST 50mg/Nm³

1,570 PREMATURE DEATHS

800

CASES OF CHRONIC BRONCHITIS (ADULTS)

410.960



39,160 ASTHMA SYMPTOM DAYS (CHILDREN)

€4.380m TOTAL HEALTH COSTS (MILLION EUROS)

(VSL. HIGH VALUE) 2013 PRICES

2016 IED **LIMITS**

S02 200mg/Nm³ NO_x 200mg/Nm³ DUST 20mg/Nm³

340 商 PREMATURE DEATHS

170 CASES OF CHRONIC BRONCHITIS (ADULTS)

78,320 WORK DAYS LOST

8.150 **ASTHMA SYMPTOM** DAYS (CHILDREN)

€930m TOTAL HEALTH COSTS (MILLION EUROS) (VSL. HIGH VALUE)

2013 PRICES

PROPOSED BREF **LIMITS**

S0₂ 130mg/Nm³ NO_X 175(L)/150(HC) mg/Nm³ DUST 8mg/Nm³

250 PREMATURE DEATHS

130 CASES OF CHRONIC BRONCHITIS (ADULTS)

56.950 WORK DAYS LOST

6.080 **ASTHMA SYMPTOM** DAYS (CHILDREN)

€700m TOTAL HEALTH COSTS (MILLION EUROS)

(VSL. HIGH VALUE) 2013 PRICES

BEST AVAILABLE TECHNIQUES (BAT)

SO₂ 10mg/Nm³ $NO_X < 85(L)/65(HC) \text{ mg/Nm}^3$ DUST 2mg/Nm³

160 PREMATURE DEATHS

80 CASES OF CHRONIC BRONCHITIS (ADULTS) \$

36,980 WORK DAYS LOST

3.800 **ASTHMA SYMPTOM** DAYS (CHILDREN)

€430m TOTAL HEALTH COSTS (MILLION EUROS) (VSL, HIGH VALUE)

2013 PRICES

TABLE DEROGATIONS OVERVIEW (BULGARIA)

COUNTRY /	Coal type	MWel		PREMATUI	RE DEATHS	Derogation	
Plant name			2013	IED	BREF	BAT	
BULGARIA							
Ruse Iztok	Hard coal	368	18	8	6	1	TNP
Brikel	Lignite	184	17	14	11	9	DR
Plovdiv North	Lignite	46	1	1	1	0	LLD
Sliven	Lignite	28	17	3	2	1	DH
Deven	Hard coal	791	48	24	16	4	LLD
Maritsa 3	Lignite	100	19	10	8	6	DR
TOTAL	: 	1,517	120		:		:

Six out of the 11 Bulgarian coal plants are making use of 'derogations'. This corresponds to 30% of its total coal generation capacity and 120 premature deaths.

2013 Currently operating plants **DH IED** 2016 IED limits **BREF** Proposed BREF limits **BAT** Best Available Techniques **TNP** Transitional National Plan

District Heating Desulphurisation Rate **LLD** Limited Lifetime

The **Bulgarian TNP** lists one coal LCP that will delay the implementation of the IED limits until mid-2020. The following extra pollution could be prevented each year if the lignite plant were withdrawn from the TNP:

TABLE POLLUTION LIMITS (BULGARIA)

POLLUTANT (in tonnes)	2013 emissions (same plants)	Derogations allow pollution up to	Maximum pollution under 2016 IED limits	Extra pollution allowed each year	TOTAL extra coal pollution allowed due to TNP (2016-Mid 2020)
SO ₂	524	1,187	594	593	2,669
NO _X	1,180	3,561	594	2,967	13,352
Dust	56	148	59	89	401

GENERAL ASSESSMENT OF POSITION TAKEN IN LCP BREF REVIEW RELATING TO COAL:

The Bulgarian authorities have not been active in the information exchange. The limited interventions from the Bulgarian representatives were always aimed at defending the polluters. Bulgaria argued in favour of the desulphurization rate for lignite to allow a tripling of SO_x emissions.









