INFORMATION ON PLANNED SAFETY MEASURES SAFETY AND ACTION PLAN IN THE EVENT OF A MAJOR ACCIDENT AT MONBAT AD

2025, Montana

1. Name and/or trade name of the operator.

"Monbat" AD

2. Name and full address of the enterprise/facility.

Monbat AD

Production site: Montana, Montana, Montana, ul. "Industrialna" No. 76

3. Number and date of the current notification for classification of the enterprise/facility, submitted pursuant to Article 103, paragraph 2 or 5 of the Environmental Protection Act; number of the decision pursuant to Article 10C, paragraph 4 of the Environmental Protection Act for the PSNRP; number of the decision under Article 11C(1) or Article 11C(g)(4) of the Environmental Protection Act (number of the decision under Article 33(2) of the Environmental Protection Act) for PSVRP.

- Notification of updated classification under Article 103, paragraph 5 of the Environmental Protection Act - Ref. No. 7068/28.10.2022
- Confirmation Ref. No. UK-4532/22.12.2022 of the Executive Environment Agency, approving the updated classification of an enterprise/facility with "high risk potential";
- Decision No. 259-A0/2024 of the Executive Environment Agency for approval of a Safety Report pursuant to Article 116(1)(1) in conjunction with Article 109(1) of the Environmental Protection Act.

4. Brief description of the activity or planned activities in the enterprise/facility.

Monbat AD is an enterprise specialising in the production of lead-acid storage batteries, including an installation for the production of lead-acid storage batteries - the production of starter batteries and stationary batteries for heavy goods vehicles, buses, road construction, agricultural and railway equipment, and batteries for cyclic use.

The company's production site also operates a facility for recycling non-ferrous metals from end-of-life batteries (IRB). The recycling plant is operated by the subsidiary Monbat Recycling EAD, which is owned by Monbat AD.

The company's activities are authorised under a complex permit.
No. 2-N3/2019, updated by Decision No. 2-N3-I0-A1/2022 of the Executive Director of the Executive Environment Agency.

5. General information on the hazardous substances available at the enterprise/facility from Annex No. 3 to the Environmental Protection Act, which contains a general name, or in the case of a hazardous substance/hazardous substances from Part 1 of Annex No. 3 to the Environmental Protection Act – generic name and classification of the hazards of the hazardous substances listed in Annex No. 3 to the Environmental Protection Act available at the enterprise that may cause a major accident, and a description of their main hazardous properties.

Chemical name[1]	CAS No	EC No	Hazard category(ies) according to Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP) (OJ, L 353/1 of 31 December 2008)	Classification according to Annex No 3 to Article 103(1) to ZOOS[2]	Design capacity of the technological facility/facilities (in tonnes)[3]	Available quantity (in tonnes)[4]	Physical properties [5]
1	2	3	4	5	6	7	8
Lead-acid battery production plant (IPOKAkB)							
Lead (Pb) - metal	7439-92	231-100-4	Lact. H362 Repr. 1A H360FD Repr. 1A; H360D: C ≥ 0.03 %	Not classified	900 t	250 t	Solid
Lead alloys	7439-92 7440-36	231-100-4 231-146-5	Aquatic Chronic 3 H412 Carc. 2 H351 (Inhalation) Acute Tox. 4 H302 Acute Tox. 4 H332 Aquatic Chronic 2 H411 Aquatic Chronic 2 H411 Acute Tox. 2 H300 Acute Tox. 2 H310 Carc. 2 H351 Acute Tox. 3 H301	Part 1 – Health hazard, H2 Part 1-Dangerous for the environment, E2	600 t	200 tonnes	Solid
Sulphuric acid H_2SO_4, 37%*	7664-93	231-639-5	Skin Corr. 1A H314 Eye Irrit. 2; H319: 5 ≤ C < 15 % Skin Corr. 1A; H314: C ≥ 15 % Skin Irrit. 2; H315: 5 ≤ C < 15 %	Not classified	90	35	liquid storage – atmospheric pressure, T =10 – 25 °C
Sulphuric acid	7664-93-9	231-639	Skin Corr. 1A-H314	Not classified	80	75	Liquid
Lubricating and hydraulic oils	64742-65-0	265-169-7	Skin Irrit. 2-H315 Eye Dam. 1-H318 Eye Irrit. 2-H319 Aquatic Acute 1-H400 Aquatic Chronic 1-H410 Aquatic Chronic 2-H411	Not classified	5	3.5 t	Liquid
Calcium oxide /for WWTP/	1305-78-8	215-138-9	Skin Irrit. 2 H315 Eye Dam. 1 H318 STOT SE 3 H335	Not classified	50 m^3	40 m^3	Dust
Lead powder – PbO up to 80% (intermediate product – mixture)**	7439-92-1 1335-25-7	231-100 4215-626-1	Acute Tox. 4, H302; Acute Tox. 4, H332; STOT RE 2, H373; Aquatic Chronic 1, H410. Repr. 1A H360 (Df) STOT RE 2 H373(not specified)	Part 1 - E1 Dangerous for aquatic environment in Category Acute hazard	220	220 t	Dust-like

			Repr. 1A H360 (unborn child) Aquatic Acute 1 H400				
Natural gas	74-82-8	200-812-7	Press.Gas Flam. Gas 1 H220	Listed by name in point 18, P2	1	1,345	gas
Liquefied propane-butane	68512-91-4 68477-71 74-98-6 68606-26-8	270-990-9 270-752-4 200-827-9 271-735-4	Flam. Gas 1, H220 Press. Gas, H280 Muta. 1B, H340 Carc. 1A, H350	Listed by name in point 18, P2, Part 1 Categories of dangerous substances, Health hazards	43.95	0	Liquefied hydrocarbon gas
Installation for recycling non-ferrous metals from waste batteries /IRB/							
Arsenic	7440-38	231-148-6	Acute Tox. 3 (*)-H331 Acute Tox. 3 (*)-H301 Aquatic Acute 1-H400	Part 1, hazard category – H2-Acute toxicity, Category 3 E1- Dangerous for the environment	10	8 t	Solid
Selenium	7782-49	231-957-4	Acute Tox. 3 (*)-H331 Acute Tox. 3 (*)-H301 STOT RE 2 (*)-H373 Aquatic Chronic 4 (*)-H413	H2	3	2 t	Solid
Sodium base, flakes	1310-73	215-185-5	Skin Corr. 1B- H314; H290	Not classified	40	30 t.	Solid
Sodium base, solution	1310-73-2	215-185-5	Skin Corr. 1B- H314; H290	Not classified	15	10 t	Inorganic chemical /IBC containers/
Sodium nitrate	7631-99-4	231-554-3	Oxid. Solid 3- H272 Eye Irrit. 2- H319	P8	30	20 t	Solid
Calcium	7440-70	231-179-5	Oxid. Solid 2-H261	Not classified	10 t	5 t	Solid
Sodium sulphide	1313-82-2	215-211-5	Met. Corr. 1-H290 Acute Tox. 3-H301 Skin Corr. 1B- H314 Aquatic Acute 1-H400	Part 1 - Health hazard -H2 Part 1 - Dangerous for the environment Environment, E1	50	50 t	Solid
Sodium carbonate	497-19-8	207-838-8	Eye Irrit. 2-H319	Not classified	100 points	80 points	Solid
Sodium sulphate, Na_2SO_4	7757-82-6	231-820-9	Skin Sens 1-H317 Aquatic Chronic 3- H412 Skin Irrit. 2-H315 Eye Irrit. 2-H319	Not classified	100	82	Powdery
Hydrogen peroxide	7722-84	231-765-0	Ox. Liq. 1-H272 Acute Tox. 4 (*)-H332 Acute Tox. 4 (*)-H302 Skin Irrit. 2-H315 Eye Damage-H318 STOT SE 3-H335	Part 1, Hazard category of hazard – P8-Oxidising liquids and solids	4	4 t	liquid
Zinc	7440-66	231-175-3	Water-react. 1-H250 Pyr. Sol. 1-H260 Aquatic Acute 1-H400 Aquatic Chronic 2-H410	Part 1-Dangerous for the environment, E1	100 t	45 t.	Solid

Oxygen, (cooled)	7782-44-7	231-956-9	Ox. Gas 1-H270 Press. Gas-H280	Listed by name in section 25, P4	50	50	Liquefied gas
Tin	7440-31-5	231-141-8	Eye Irrit 2-H319 STOT SE 3-H335 Acute Tox 4-H302 Aquatic Chronic 4-H413 Flam. Sol 1-H228	Not classified	30	0	Solid
Sulphur	7704-34	231-722-6	Skin Irrit. 2-H315	Not classified	25	0	Solid
Antimony, Sb	7440-36-0	231-146-5	Carc. 2 (Inhalation)- H351 Aquatic Chronic 3- H412	Not classified	10	6 t	Solid
Calcium-aluminium alloy	7440-70-2 7429-90-5	231-179-5 231-072-3	Water-React. 2- H261	O1	10	10 t	Solid
Dicot 11 coating	-	-	Skin Corr. 1B-H314, Skin Irrit. 2-H315, Eye Dam. 1-H318, Eye Irrit. 2-H319, STOT SE 3-H335 Aquatic Acute 1-H400	Part 1-Hazardous to the environment Environment, E1	1 t	0.9 t	liquid
Lubricating and hydraulic motor oils	-	-	Skin Irrit. 2-H315 Eye Dam. 1-H318 Eye Irrit. 2-H319 Aquatic Acute 1-H400 Aquatic Chronic 1- H410 Aquatic Chronic 2-H411	Not classified	1	1 point	Liquid
Liquid for windscreen washer fluid - summer/winter	-	-	EUH210	Not classified	1 t	0.700 t	Liquid
Antifreeze	-	-	Acute Tox. 4(*)-H302 STOT RE. 2-H373	P5a	0.5 t	0.4 t	liquid
Acrylic spray paint	-		Flam. Gas 1-H224 Eye Irrit. 2-H319 STOT EE;H336	P5a	0.3 t	0.2 t	Liquid
Fuel for diesel engines	68334-30-5	269-822-7	Flam. Liq. 3; H226, Asp. Tox. 1; H304, Skin Irrit. 2; H315, Acute Tox. 4; H332, Carc. 2; H351, STOT RE 2; H373, Aquatic Chronic 2;H411	Listed by name in point 34, P5b, Dangerous for the environment - E1	5 t	3 t	liquid

Note:* Sulphuric acid (H_2SO_4) with a concentration of 37% - for production purposes, the highly concentrated sulphuric acid obtained is diluted.** Lead powder PbO up to 80% (intermediate product – mixture) – obtained as a result of an additional process in the "Mill" section (lead cylinders are stored in a silo and automatically fed to the lead powder mill. In the mill, the cylinders are ground by air, and the resulting lead powder is extracted and stored in a lead powder silo).

On the premises of Monbat AD and Monbat Recycling EAD, the following types of hazardous waste, classified in accordance with Ordinance No. 2 of 23 July 2014 on the classification of waste, are generated and/or may be generated and stored, and accepted for recovery (recycling) the following types of hazardous waste, classified in accordance with Ordinance No. 2 of 23 July 2014 on the classification of waste (published in State Gazette No. 66 of 8 August 2014, as amended and supplemented).

Name	Waste code	Hazard category/ies according to Regulation (EC) No. 1272/2008	Classification according to Annex No. 3 to Article 103, paragraph 1 ZOOS	Design capacity t t. (in m^3 and tonnes) 2	Available quantity creation (in tonnes)	Physical form of substance the
Lead-acid battery production plant (IPOKAkkB)						
Other dust particles, containing hazardous substances (lead slag)	10 10 11*	Aquatic Chronic 2; H411	Part 1, hazard category – hazardous to the environment environment E2	Site 5A – 60 t	15 t	solid
Other dust particles, containing dangerous substances (batteries plates) from sections "Grazing", Forming, Cutting and "Assembly"	10 10 11*	Aquatic Chronic 2; H411	Part 1, category hazard – dangerous for the environment Environment E2	Site 37A – 30 t.	2 t	solid
Other dust particles, containing hazardous substances (lead scraps and "ears") from areas "Grazing", "Cutting" section "Punching".	10 10 11*	Aquatic Chronic 2;H411	Part 1, category hazard – dangerous the surrounding Environment E2	Site 37A – 30 t.	2 t	solid
Non-chlorinated motor and lubricating oils and oils for gear transmissions of mineral-based (operation and maintenance of gearboxes)	13 02 05*	Aquatic Chronic 2;H411	Part 1, category hazard – hazardous for the environment Environment E2	Site 20 – 1 point	0	Liquid
Lead accumulator batteries /scrap/	16 06 01	Harmful to aquatic, H412	Part 1, category nazardous – dangerous for the environment E1	500 t	13 t	hazard
Fluorescent tubes and other waste, containing mercury	20 01 21*	Acute Tox. 2 * H330 Repr. 1B H360D STOT RE 1 H372 Aquatic Acute 1 H400 Aquatic Chronic 1 H410	Part 1, category hazard – dangerous for the environment environment E2	Site 25 – 0.100 t	0.040 t	Solid
Battery recycling facility (BRF)						
Slags from the first and second stages of	10 04 01*	Aquatic Chronic 2;H411	Part 1, hazard category –	Area 5a – 400 tonnes	65,860 t	Solid

production (lead slag)			hazardous to the environment E2			
Dross and light slag from the first and second stages of production	10 04 02	Aquatic Chronic 2; H411	Part 1, hazard category – dangerous for the environment E2	Sites 5a – 450 t., 21 – 1500 t, 36 – 500 t, 41 – 1500 t	100 t	solid
Separately collected electrolyte from batteries and accumulators (CX Engitec section)	16 06 06	Aquatic Chronic 2;H411 Skin Corr.1A, H314	Part 1, hazard category – hazardous to the environment E2	Area 4a, tank with a capacity of 6,950 tonnes	0 t	liquid
Other lining and refractory materials from metallurgical processes containing dangerous substances	16 11 03*	Aquatic Chronic 2; H411	Part 1, hazard category – hazardous to the environment E2	Area 4D – 1 t.	0 t	Solid
Other waste (including mixtures of materials) from mechanical treatment of waste containing dangerous substances (polypropylene waste – CX Engitec)	19 12 11	Aquatic Chronic 2; H411	Part 1, hazard category – dangerous for the environment E2	Site 5G – 150 t	0	Solid
Other waste (including mixtures of materials) from mechanical treatment of waste containing dangerous substances (PE separator – CX Engitec)	19 12 11*	Aquatic Chronic 2; H411	Part 1, hazard category – dangerous for the environment E2	Site 16 B – 425 t., 41 – 400 t	675,596 t	Solid
Other waste (including mixtures of materials) from mechanical treatment of waste containing dangerous substances (lead oxide fraction, desulphated fraction – CX Engitec)	19 12 11*	Acute Tox. 4, H302 Acute Tox. 4, H332 STOT RE 2, H373 Aquatic Chronic 2, H411	Part 1, hazard category – dangerous for the environment E2	Site 5 – 800 t, 41 – 300 t	100.6 t	Solid
Other waste (including mixtures of materials) from mechanical treatment of waste containing dangerous substances (lead-metal fraction – CX Engitec)	19 12 11	Aquatic Chronic 2, H411	Part 1, hazard category – dangerous for the environment E2	Site 5 – 100 t	98.8 t	Solid
Hazardous waste for the site, generated by both installations						
Dust from waste gases containing hazardous substances (lead dust from bag filters)	10 10 09	Aquatic Chronic 1; H411	Part 1, hazard category – hazardous to the environment E2	Site 5A – 37 t, 41 – 200 t	0.080 t	dust
Packaging containing residues of dangerous substances or contaminated with dangerous substances	15 01 10	Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E2	Sites 4D – 1 t, 43 – 9 t.	1 t	Solid
Absorbents, filter materials (including oil filters, not mentioned elsewhere),	15 02 02*	Aquatic Chronic 2; H411	Part 1, hazard category – dangerous for	Sites 5A – 6 t, 43 – 6 t.	3 t	solid

Wiping cloths, protective clothing contaminated with hazardous substances			environment E2			
Laboratory chemicals consisting of or containing hazardous substances, including mixtures of laboratory chemicals	16 05 06*	Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E2	Site 25 – 0.200 t	0	Miscellaneous
Sludge containing hazardous substances from other types of industrial wastewater treatment wastewater treatment (lead paste from SOOT and WWTP)	19 08 13*	Acute Tox. 4, H302 Acute Tox. 4, H332 Repr. 1A, H360 STOT RE 2, H373 Aquatic Chronic 2, H411	Part 1, hazard category – dangerous for the environment E2	Site 5A – 38 t.	0	suspension -zia
Hazardous waste accepted for recovery, recycling						
Metal oxides containing heavy metals	06 03 15*	Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E2	Area 5A – 25 t	0	Solid
Waste containing other heavy metals	06 04 05	Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E2	Area 5A – 25 points	0 points	Solid
Sludge from on-site wastewater treatment containing hazardous substances	06 05 02	Acute Tox. 4, H302 Acute Tox. 4, H332 Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E1	Site 5A – 25 t	0	suspension -zia
Slags from the first and second stages of production	10 04 01	Aquatic Chronic 2, H411	Part 1, hazard category – dangerous for the environment E2	Site 5a – 400 t	0	Solid
Other particulate matter and dust	10 04 05	Acute Tox. 4, H302 Acute Tox. 4, H332 Repr. 1A, H360 STOT RE 2, H373 Aquatic Acute 1, H400 Aquatic Chronic 1, H410	Part 1, hazard category – hazardous to the environment E2	Area 5A – 25 t.	0 t	dust
Dust from waste gases containing hazardous substances (lead dust from bag filters)	10	Aquatic Chronic 1; H411	Part 1, hazard category – hazardous to the environment E2	Site 5A – 37 t, 41 – 200 t	0 t	dust
Other dust particles containing hazardous substances	10 10 11*	Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E2	Area 5A – 25 points	0 points	dust
Lead accumulator batteries	16 06 01	Harmful to aquatic, H412	Part 1, hazard category – hazardous to the environment E1	Site 5 – 3,000 t	50 t	Solid

Sludge containing dangerous substances from other types of industrial waste water treatment	19 08 13	Acute Tox. 4, H302 Acute Tox. 4, H332 Repr. 1A, H360 STOT RE 2, H373 Aquatic Chronic 2, H411	Part 1, hazard category – hazardous to the environment E2	Site 5A – 37.5 t	0 t	suspended -zia
Other waste (including mixtures of materials) from mechanical treatment of waste, containing dangerous substances (lead paste)	19 12 11*	Acute Tox. 4, H302 Acute Tox. 4, H332 STOT RE 2, H373 Aquatic Chronic 2, H411.	Part 1, hazard category – hazardous to the environment E2	Site 5 – 800 t, 41 – 300 t	0 t	Solid
Other waste (including mixtures of materials) from mechanical treatment of waste containing dangerous substances (lead-metal fraction)	19 12 11	Aquatic Chronic 2, H411	Part 1, hazard category – dangerous for the environment E2	Site 5 – 100 t	100 t	Solid

6. General information related to the nature of major accident hazards, including their potential effects on the population and the environment.

The production site of Monbat AD and Monbat Recycling EAD is located in the Northern Industrial Zone of Montana. The land is designated for permanent use as "for machine building and machine processing industry" and "for other types of production and storage facilities". The minimum distance to the nearest residential areas (buildings) is 600 m to the southwest. The production site borders industrial facilities (enterprises) and railway and road infrastructure facilities.

The production site borders industrial facilities (enterprises) and railway and road infrastructure facilities.

The location of the production site does not fall within or affect sites of the NATURA 2000 national ecological network or other areas with special protection status.

The process of identifying production hazards and assessing risks involves determining the situations and events that cause accidents, assessing the probability, vulnerability and consequences of such situations and events occurring.

The activities and technical equipment at the site suggest the possibility of accidents occurring if safety requirements are not complied with in production premises and open areas. Emergency situations represent a deviation from normal operating conditions, which can cause human casualties and material damage.

The results of the hazard identification and risk assessment are used to develop specific measures to prevent accidents/reduce the risk of their occurrence.

Potentially hazardous areas on the production site have been identified.
Monbat AD, where a major accident could occur, and a description of the operational causes that are defined as conditions for the occurrence of major accidents:

Production accidents

- Fires and explosions – all production workshops and areas where natural gas is used for production purposes are fire hazardous.

The following are also fire hazards on the company's premises: power transmission facilities /cable penetrations and electrical panels/ are also fire hazards on the company's premises.
Under certain conditions, it is possible for fires to spread from neighbouring areas and spaces that are not fireproof, causing a fire on the premises.
Monbat has and maintains all necessary fire protection equipment in accordance with the requirements of the Fire Safety and Civil Protection Regional Service.

In the event of a fire, immediate action shall be taken in accordance with the Firefighting Action Plan for personnel, including the procedure for emergency shutdown of technological equipment.

The necessary type and number of fire extinguishers are installed on the premises of the enterprise.

Fire alarm systems (FAS), fire extinguishing systems and smoke and heat extraction ventilation systems (SHEVS) have been installed in the production premises where their installation is possible. The systems are inspected annually by a licensed company to ensure their proper functioning.

- Industrial accidents involving the release of toxic substances

Industrial accidents are likely to occur on the production site, creating a more complex situation in:

- The storage facility for auxiliary materials and chemicals. Incorrect use or damage or accidents leading to destruction/breakage/ of the containers in which they are stored or transported, including pipelines, may result in injury to personnel in the vicinity, cause material damage to the company and pollute the environment to a lesser or greater extent.

In the event of leakage (spillage) of sulphuric acid and sodium hydroxide or due to:

- a breach in the body of one of the tanks or units as a result of wear and tear or external impact, overfilling of the tank in the SGP;
- a breach in the body of a tanker or damage to the acid drainage valves as a result of ageing (wear and tear), a terrorist act or other external impact;
- leaks from pipelines.

The main danger for personnel working or passing near the accident site is exposure to sulphuric acid or sodium hydroxide on parts of the body, resulting in severe chemical and thermal burns. A localised source of chemical contamination will also arise, but the gas will only be present in a limited area (immediately adjacent to the spill site).

The production process is organised in such a way that, in the event of sulphuric acid leaks, the acid is collected in bunds built around the storage tanks.

In addition, a chemical sewerage system has been built on the production site, which, in the event of a large spill of concentrated sulphuric acid, will carry the spilled acid to the WWTP for neutralisation.

An analysis and assessment of natural causes has also been carried out:

- Earthquake;
- Floods;
- Snow drifts, icing, freezing.

A detailed description of accidents caused by natural disasters is provided in the approved Safety Report.

According to the quantitative risk assessment prepared for the DB, the following conclusion has been reached:

From the major accident scenarios considered, it can be concluded that the greatest danger exists in the event of deformation of connections and joints in the existing

plant pipeline network, accidents related to ignition due to the leakage of flammable substances.

Accidents involving dust would cause temporary discomfort to plant workers (a short period of time until the point of impact is treated).

Possible negative consequences related to injuries and/or burns may be expected to occur to personnel located within the enterprise. No adverse and irreversible effects are expected on people passing by the production fence of the enterprise. Based on the calculations and distances presented, no negative impact on residents in the residential area of Montana is expected. In the event of large spills of hazardous substances, it is mandatory to notify the employees at the wastewater treatment plant in Montana.

In the event of a major spill of hazardous substances, it is mandatory to notify the workers at the wastewater treatment plant in the town of Montana.

7. General information on the methods of warning and informing the affected population in the event of a major accident (information on appropriate behaviour in the event of a major accident or indication of the source where the information can be accessed electronically).

The employees and management of MONBAT shall take the following actions in the event of a major accident:

- Calling 112 for emergency calls - to receive the emergency call and forward it to the competent institutions;
- Regional Operational Centre at the Regional Directorate "Fire Safety and Civil Protection" (ROC at RDFCP Montana) - Montana - dispatch of personnel and specialised equipment to carry out operational intervention in the event of an accident at the site;
- Municipal headquarters - tel. 096/300 412
- The necessary information to be disseminated to the affected population is provided:

In the event of a major accident, it shall be announced immediately, providing the following information:

- date, time and place of the event;
- brief description of the circumstances;
- information on the quantity and type of dangerous substances/mixtures that caused the accident or aggravated its consequences, and their immediate impact on human health and the environment;
- available data allowing for an assessment of the consequences of the event for human health and the environment;
- scale – quantity of dangerous substances/mixtures; consequences for human life and health (number of fatalities, injured persons) and for infrastructure (damaged/unusable facilities, equipment, buildings, interruption of water supply, electricity supply, telephone services, number/time), direct damage or contamination above the maximum permissible limits for environmental components);

- description of the emergency measures taken immediately after the occurrence and the immediate precautionary measures necessary to prevent a recurrence and limit the medium- and long-term consequences.

Additional information shall be provided upon receipt of new data related to the causes of the occurrence and its consequences, if further developments reveal additional facts that change the information initially submitted or the conclusions drawn.

8. Information on recommended actions and behaviour for the affected population in the event of a major accident.

- Upon receiving a signal from the civil protection authorities, remain calm and warn the people around you of the danger;
- If you you are outdoors outdoors, leave the area by moving moving perpendicular to the direction of the wind;
- If you are in a vehicle, close the windows, take the shortest route and leave the area of the accident;
- Send the injured to a hospital;
- When leaving the accident area, remove contaminated clothing and wash your mouth and eyes;
- When returning to your homes and workplaces (after the accident has been rectified), ventilate the premises;

G. Additional information on safety measures and behaviour in the event of a major accident, including a link to the public register under Article 111(1)(6) of the Environmental Protection Act.

https://public-seveso.moew.government.bg/enterprises/10404

10. Details of the person providing the information and date of preparation.

Denitsa Hristova - Director of Environmental, Waste and Water Management,
Monbat AD 31 March

2025

11. In addition to the information under items 1 to 10, the following shall also be included for high-risk enterprises/facilities:

11.1. general information on the nature of major accident hazards, including their potential impact on human health and the environment, as well as a description of the main major accident scenarios and the measures taken to limit their consequences;

Based on the analyses and calculations performed for the worst-case accident scenarios at the production sites of Monbat AD and Monbat Recycling EAD, it can be concluded that no residential areas, leisure and recreation areas, residential areas, protected areas, or sites of cultural and historical heritage.

In the event of an accident, there may be damage to the health and lives of people working on the production site.

The assessment of the consequences of a major accident is made using the Rapid Risk Assessment Methodology, which defines the standard distances (scope of the zones) for the distribution and determination of the spatial boundaries of the emergency planning zones.

Natural gas accident;

- Break in the natural gas pipeline

The probability of an accident occurring is low, but it has nevertheless been considered. In the event of a technical malfunction or operator error, a fire may occur in the area of the natural gas leak.

Based on the results obtained using the Rapid Risk Assessment Methodology, the following conclusions can be drawn regarding the identified consequences - territorial scope of the areas, number of workers and population affected, the degree and type of damage caused by direct and indirect effects as a result of an accident:

- First zone – high mortality zone The Rapid Assessment Methodology does not identify such a zone.
- Second zone – zone of serious damage. The rapid assessment methodology does not define such a zone
- Third zone – zone of special attention. This is the zone where weaker adverse effects are expected, mainly in vulnerable or predisposed individuals (young children, asthmatics, elderly people, etc.). In this zone, attention should be focused on high-risk facilities and installations that need to be protected from the occurrence of emergency operating modes, secondary fires or accidents, and any other incidents. The rapid assessment methodology defines such a zone as an area of 0.3 hectares or a sector of 36° with a radius of approximately 75.

The areas affected by possible major accidents are located exclusively within the territory of the enterprise. Only the personnel working on site at the time of the accident can be considered potentially at risk in the event of an accident.

Propane-butane accident – leakage of liquid/gaseous hazardous substances

Such hazardous substances at the MONBAT site are: diesel fuel, natural gas, propane-butane, oxygen, sulphuric acid, electrolyte. Leakage may occur for the following reasons:

- Breach in the storage containers for oxygen, diesel fuel, propane-butane, sulphuric acid, electrolyte.

Circumstances leading to damage to storage vessels (tanks) will result in the leakage of hazardous substances. In this situation, an accident is unlikely to occur, but due to the properties of diesel fuel and propane-butane, a fire may occur in the presence of an external source.

- Leakage of propane-butane from storage vessels and subsequent ignition Calculations show that two circular impact zones are formed.

The damage zones of possible major accidents lie exclusively within the territory of the enterprise. Only personnel working at the time of the accident and located in the area around the propane-butane storage site can be considered potentially at risk in the event of an accident. The property on which the facility is located is adjacent to the main production site. Personnel will be present around the propane-butane storage tanks when refuelling and/or other types of maintenance are carried out.

Agreed measures for action in various emergency situations have been taken and are being followed to limit and/or reduce unexpected adverse effects on people and the environment in the area of the facility. All legal requirements were taken into account when designing the facility.

With regard to the negative impact on the environment in the event of an accident involving a propane-butane leak, the following conclusions have been drawn:

The property on which the facility is located has a durable concrete floor, which in the event of a fire and/or LPG leak will not have a negative impact on the soil and groundwater;

- **Accident in an oxygen tank and pipeline;**

Possible accidents include: leaks from pipelines, flanges, opening of a pressurised oxygen supply system, use of oxygen for cutting and welding.

The leaked oxygen remains in the atmosphere and, if there is insufficient ventilation, becomes enriched there. As a result, a fire may occur.

- **Accidents involving liquid and solid raw materials/waste;**

Spillage of hazardous substances/waste during unloading or when the integrity of the containers in which they are stored is compromised. Spillage may be due to a defect/compromised integrity of the packaging, an external or natural cause.

The preventive measures against pollution that the companies have taken are: The storage areas and the internal road infrastructure are constructed of acid-resistant concrete. An internal sewage system (chemical) has been constructed, connected to the sewage system of the WWTP. Pollution of surface and groundwater is not possible.

- **Accidents caused by fire**

Fires may occur as a result of a combination of various accidental technological processes, chemical reactions, and hot work.

All necessary fire protection equipment is installed and available on the premises of the enterprises. In the event of a fire, the activities described in the Fire Action Plan are implemented.

The following measures have been taken to limit the consequences:

Work instructions have been developed and implemented to ensure the safe management of technological processes and the safe operation of all equipment and installations. The effectiveness of measures to prevent and limit

the consequences of major accidents depends on timely notification, periodic checks on the condition of equipment and installations, and good personnel organisation.

Resources

Monbat AD has provided the necessary means to prevent major accidents and limit their consequences. The following are provided on site:

- fire alarm system;
- gas detectors;
- hydrants located on the site;
- fire extinguishers**.**

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Operational headquarters for disaster and accident response have been set up at the production sites, consisting of a chairperson, deputy chairperson and secretary. In the event of an accident, the first group of people to join the SNAVR are those located at the site. After the accident has been reported, those arriving will join the SNAVR.

A number of systems have been set up at the production site to prevent and limit the consequences of major accidents.

11.2. information from the external emergency plan, which includes advice on cooperation with the relevant operational centre of the General Directorate "Fire Safety and Civil Protection" of the Ministry of the Interior and the mayor of the municipality directly threatened during an accident;

The municipal administration immediately mobilises a group of forces and resources to carry out rescue and urgent emergency recovery work in the affected area.

Municipal administration officials are put on standby in accordance with the approved External Emergency Plan. Under the leadership of the mayor of the municipality, tasks are assigned and the situation is assessed. The population is given instructions on how to behave and act in the specific situation.

The forces and resources for carrying out the SNAVR in the event of an accident are mobilised in the order determined by the mayor of the municipality or the established headquarters.

Cooperation is organised by the mayor of the municipality, the coordination headquarters or the operational teams on site.

11.3. information on the risk of a major accident at the establishment with transboundary impact in accordance with the Convention.

The activities of Monbat AD do not pose a risk of a major accident with transboundary impact.