



**Nazar Tekstil San. ve Tic.  
A.Ş.**

**Yarn Production Plant**

**Air Quality Management  
Plan**

**January 2022**

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## 1.0 Introduction

### 1.1 Proje Tanımı

Nazar Textile San. ve Tic. A.Ş. (Nazar Textile ) is producing 100% cotton yarn in Ring Compact Mill with a capacity of 35.000 kg per day, count range is between Ne 24/1 – Ne 60/1 both knitting and weaving torsion in Balsuyu Bulvarı No:53/1, Kılılı Mahallesi in Kahramanmaraş Province. The facility has a co-generation facility with a capacity of 4,592 MW and solar energy panels with a capacity of 2.2 MW on the roof of the facility, the energy produced in these facilities is used in yarn production. Construction activities is ongoing within the scope of the capacity increase project for the daily production of 75 000 kg yarn in addition to the existing capacity in the factory area.

BCA Group (BCA) has carried out a comprehensive review to determine the current environmental and social obligations and reviewed the existing environmental and social documents in order to assess the technical/legal risks related to the Plant and the Environmental and Social Management Plans have been prepared in accordance with Environmental Legislation, World Bank Environmental and Social Standards, IFC Performance Standards and IFC / WB Guidelines (Environment, Health and Safety General Guidelines, Environmental, Health, and Safety Guidelines for Textile Manufacturing).

### 1.2 Purpose and Scope

Within the scope of this study, Air Quality Management Plan (AQMP) has been prepared in order to minimize the effects of the existing facility and the proposed Capacity Increase Project and to keep it at acceptable levels. The plan covers the construction and operation periods of the project.

IFC Performance Standard 3 outlines a project approach to pollution prevention and reduction in line with common international technologies and practices. The AQMP has been prepared taking into account the IFC Performance Standard 3, World Bank Environmental and Social Standards 3, IFC / WB Environment, Health and Safety Guidelines and relevant international criteria, as well as local regulations.

The AQMP prepared for the proposed project specifies the measures to eliminate or minimize the health, safety and security risks that the society may face as a direct or indirect result of the project, which may occur during the construction and operation phases of the project, and the details of the defined measures. This management plan aims to minimize and continuously improve the number of reported air quality-related incidents.

Air Quality Management Plan is valid for Nazar Textile and Contractors. Contractors are responsible for developing site procedures to meet the requirements of this plan.

### 1.3 Legislative Requirements

#### 1.3.1 National Legislation

The list of legislation considered within the scope of the study is as follows, but not limited to:

- Environmental Law No. 2872,
- Environmental Impact Assessment Regulation, published in the Official Gazette dated 25.11.2014 and numbered 30025,
- Environmental Permit and License Regulation, published in the Official Gazette dated 10.09.2014 and numbered 29115;
- Regulation on Environmental Management Services, published in the Official Gazette dated 30.07.2019 and numbered 30847,
- Regulation on Control of Industrial Air Pollution, published in the Official Gazette dated 03.07.2009 and numbered 27277,
- Regulation on Regulation Regarding Landfilling of Wastes published in the Official Gazette dated 26.03.2010 and numbered 27533,
- Exhaust Gas Emission Control Regulation, published in the Official Gazette dated 04.04.2009 and numbered 27190,
- Water Pollution Control Regulation, published in the Official Gazette dated 31.12.2004 and numbered 25687,
- Waste Management Regulation, published in the Official Gazette dated 02.04.2015 and numbered 29314,
- Regulation on Control of Excavated Soil, Construction and Demolition Wastes, published in the Official Gazette dated 18.03.2004 and numbered 25406,
- Packaging Waste Control Regulation, which entered into force by being published in the Official Gazette dated 27.12.2017 and numbered 30283,
- Waste Oil Management Regulation, published in the Official Gazette dated 21.12.2019 and numbered 30985,
- Regulation on Control of Medical Wastes, which entered into force by being published in the Official Gazette dated 25.01.2017 and numbered 29959,
- Regulation on Control of Waste Batteries and Accumulators, published in the Official Gazette dated 31.08.2004 and numbered 25569,
- Regulation on Control of End-of-Life Tires, published in the Gazette dated 25.11.2006 and numbered 26357,
- Regulation on Control of Soil Pollution and Point Source Contaminated Sites, which entered into force by being published in the Official Gazette dated 08.06.2010 and numbered 27605,
- Regulation on Health and Safety Precautions in Working with Chemical Substances, published in the Official Gazette dated 12.08.2013 and numbered 28733,

- Occupational Health and Safety Regulation in Construction Works, published in the Official Gazette dated 05.10.2013 and numbered 28786,
- Occupational Health and Safety Risk Assessment Regulation published in the Official Gazette dated 29.12.2012 and numbered 28512.

### **1.3.2 International Criteria**

In accordance with IFC / WB Guidelines (Environmental, Health, and Safety General Guidelines and Environmental, Health, and Safety Guidelines for Textile Manufacturing), World Bank Environmental and Social Standards 3 and IFC Performance Standards 3, concentrating on the core business activities of Nazar Textile, in order to increase the efficiency of energy, water, other resources and material inputs consumption, technically and financially feasible, cost-effective measures should be taken. These measures should be applied together with clean production principles in product development and production processes in order to save raw materials, energy and water.

In addition, in order to reduce the greenhouse gas emissions from the project, alternatives should be evaluated and technically and financially feasible, cost-effective options should be implemented.

Performance Standard 3 specifies the requirement to meet the Environmental, Health and Safety Guidelines, where applicable at the project stage. Projects should also be designed to meet applicable national laws, and projects should be maintained and operated in accordance with national law and regulatory requirements. When host country regulations differ from the levels and measures presented in the Environmental, Health and Safety Guidelines or other appropriate established environmental standards, projects are expected to meet the stricter standards.

## **2.0 Roles and Responsibilities**

### **2.1 Nazar Textile**

Nazar Textile is responsible for the comprehensive implementation of this plan, its transmission to the contractors, regular inspection of the applications related to this plan and communication with the local administrations when necessary.

### **2.2 Contractors**

All contractors assigned to the site are obliged to carry out their work in accordance with the Air Quality Management Plan. It is responsible for notifying Nazar Textile of activities that may cause unnecessary dust, emissions or risks.

### **2.3 Employees**

#### **2.3.1 Project Manager**

Nazar Textile Project Manager is responsible for allocating resources for the implementation of this plan, ensuring that the plan is communicated to the project team and the contractors, and providing the necessary training, being in contact with the Environmental Responsible/Officer in the field to monitor the performance, and making the necessary inspections to close the identified nonconformities.

#### **2.3.1 Environmental Responsible/Officer**

The Environmental Responsible/Officer employed within the scope of the project is to update this plan at least annually in accordance with the project needs, to ensure that it is implemented by the project team and contractors, to monitor and control the practices related to the protection of air quality and to provide trainings, to share the monitoring and performance data with the Project Manager, with the contractors. It is responsible for ensuring communication on air quality management, implementation and follow-up of corrective actions.

They should also ensure that air quality monitoring is carried out as outlined in the Applicable Management Plans and Procedures and work with the HR Manager to address any offsite air quality issues and/or complaints.

#### **2.3.2 All Employees**

All employees assigned in the field are obliged to carry out their work in accordance with the Air Quality Management Plan. They are responsible for notifying the Environmental Responsible/Officer of activities that may cause potential risks to other employees or communities.

### 3.0 Training

Nazar Textile will assign personnel with vocational training and competence within the scope of the Air Quality Management Plan. Within the scope of this plan, training requirements will be determined annually and included in the Annual Training Plan.

Both managers and employees will be involved in the trainings. All employees will be informed about their role in air quality management and the hazards that need to be prevented and controlled.

All Project and contractor employees are responsible for attending air quality management training and understanding the Project's approach to air quality management. These trainings will be conducted by the Environmental Responsible/Officer.

All employees will be provided with on-the-job and periodic training on emissions activities that may cause dust, and registration and follow-up procedures related to the implementation of the Air Quality Management Plan,:

Job-specific training will be provided for operators and key personnel involved in activities involving land clearing, construction or handling materials.



## **4.0 Air Quality Management and Mitigation Measures**

### **4.1 Air Quality Management**

Nazar Textile and the contractors will implement these plan requirements by adapting them to their own procedures.

Air quality issues during the construction phase of the project are dust and exhaust emissions. During the construction phase, mitigation measures such as loading/unloading without tossing and irrigation were taken for dust formation caused by excavation activities.

Chimneys of the regeneration unit, process ventilation chimney emissions will be the main emission sources during the operation period.

The emission concentrations that will arise from the project will provide the emission limits given in the Regulation on Control of Industrial Air Pollution and the IFC - Environmental, Health, and Safety General Guidelines.

Since the total rated thermal power of the existing facility is below 20 MW, it is not within the scope of the Regulation on the Monitoring of Greenhouse Gas Emissions.

The mitigation measures to be taken on air quality management during the construction and operation phases of the project are presented in Table 4-1. In the table, the subject of the impact, necessity, action to be taken, timing, monitoring activity and frequency are indicated.

**Table 4-1 Mitigations- Air Quality Management**

ISSUE	MITIGATION MEASURE	REQUIREMENT	TIMING	MONITORING	MONITORING/CONTROL PERIOD
Reducing environmental risks caused by Dust Emissions and protecting public health	Activities that will generate significant dust generation will be monitored and dust control measures implemented as recommended. Dust-emitting operations will be suspended during periods of strong winds.	IFC Environment, Health and Safety General Guidelines, Regulation on Control of Industrial Air Pollution	Construction and Operation Period	Visual inspection	Daily and on strong winds
	Soil and similar material piles will be carefully managed to reduce the risk of dust being carried by wind. E.g; During the transportation and unloading of soil piles and other materials in dry weather, mitigation measures such as water spraying will be taken in order to prevent dusting.	Regulation on Control of Industrial Air Pollution	Construction and Operation Period	Visual inspection	Daily
	At the emission source, filling and discharging operations will be carried out without tossing.	-	Construction and Operation Period	Visual inspection	Daily
	During the rehabilitation of the roads and the transportation of materials, the vehicles will be covered with tarpaulin and the upper part of the material will be kept moist.	-	Construction and Operation Period	Visual inspection	Daily
	On-site roads will be sprinkled at regular intervals.	Regulation on Control of Industrial Air Pollution	Construction and Operation Period	Visual inspection	Daily
	In order to prevent dusting on the roads that will be used during material transportation, watering will be done on the roads with a sprinkler when necessary.	-	Construction and Operation Period	Visual inspection	Daily
Reducing environmental risks caused by exhaust emissions and protecting public health	In order to prevent emissions from vehicles, all vehicles will be regularly maintained. Vehicles will not be kept running in unnecessary situations.	-	Construction and Operation Period	Vehicles maintenance records	Monthly

Protection of employee health due to dust emissions	Frequent cleaning will be done in order to reduce dust in the working areas. Indoor dust (total dust and respirable dust) measurements will be made.	IFC PS2 Dust Fighting Regulation	Operation Period	Personel exposure measurement reports	Daily visual inspection Annual
Reducing the environmental risks of emissions from the project and protecting public health	SO <sub>2</sub> emission in flue gas will not exceed 100 mg/Nm <sup>3</sup> .	Regulation on Control of Industrial Air Pollution	Operation Period	Emission report	Annual
	Dust emission in the flue gas will not exceed 10 mg/Nm <sup>3</sup> .	Regulation on Control of Industrial Air Pollution	Operation Period	Emission report	Annual
	NO <sub>x</sub> emission in flue gas will not exceed 800 mg/Nm <sup>3</sup> .	Regulation on Control of Industrial Air Pollution	Operation Period	Emission report	Annual
	CO emission in flue gas will not exceed 100 mg/Nm <sup>3</sup> .	Regulation on Control of Industrial Air Pollution	Operation Period	Emission report	Annual
	Each year, an emission measurement report will be prepared.	Regulation on Control of Industrial Air Pollution	Operation Period	Emission report	Annual
	Emissions from the facility will be forwarded to the Banks.	Environmental and Social Action Plan of the Bank	Operation Period	Emission report will shared with the Bank.	Annual
	In case the emission values remain above any limit value specified in the relevant legislation, an action plan will be submitted to the Banks within 30 days to reduce the relevant values to the said legal limits.	Regulation on Control of Industrial Air Pollution	Operation Period	Aksiyon Planı Bankaya sunulacaktır.	When necesary
Management of grievances	In case of receiving a grievance, Air Quality measurements will be made at nearest sensitive receptors.	Regulation on Control of Industrial Air Pollution	Operation Period	Air Quality Measurement Report	When necesary

## 5.0 Audits and Reporting

### 5.1 Audits and Monitoring

Nazar Textile will regularly monitor and audit the measurement results in order to evaluate the performance of air quality management.

In case of an environmental pollution risk or an event, Nazar Textile will immediately convey the problem to the Provincial Directorate of Environment, Urbanization and Climate Change. The Field Team has the responsibility to report air quality issues to Nazar Textile Project Manager.

In order to control whether the contractors fulfill the requirements of the Air Quality Management Plan, Nazar Textile Environmental Responsible/Officer will conduct daily and weekly field tours, and monitor the reported incidents, complaints and training records on a monthly basis. In addition, the Project Manager will be informed if non-compliance is detected.

### 5.2 Reporting

Field tours and daily inspections will be conducted by the Environmental Responsible/Officer, covering a wide range of operational aspects, including air quality protection.

An Emissions Inventory that includes all major atmospheric emission sources related to the Project will be prepared. This inventory will be kept up-to-date periodically to verify that the monitoring of emission sources and control of the Project's performance against the relevant Project Standards.

Any non-compliance or incident detected during monitoring, audits, periodic measurements will be reported to the Project Manager. Studies will be carried out to take and follow up the necessary actions.

All relevant records will be kept in the field office, including all air quality management procedures/instructions, monitoring, inspection and training records for the Project.