



PROVINCE OF ALESSANDRIA

DETERMINATION		DIGITAL SIGNED ORIGINAL
Prot. Gen. N.	20200021126	
Date	14-04-2020	
Code e Num. Det. DDAP2 - 362 - 2020		

OBJECT:

D.LGS.152/06 E SMI, ART. 208. AUTHORIZATION TO OPERATE THE RECOVERY OF SPECIAL NON-HAZARDOUS WASTE - RESERVE R13 AND RECOVERY R3 - COMPANY ECOPLASTEAM S.P.A. - SPINETTA MARENCO - ALESSANDRIA.

ENVIRONMENTAL DIRECTION AND TERRITORIAL PLANNING Waste Management Service

The undersigned Ing. Claudio Coffano in his capacity as Director of the Environment and Territorial Planning Directorate.

Given the law 241/90 and subsequent amendments concerning "New rules on administrative procedure and right of access to administrative documents".

Given the art. 107 of Legislative Decree 18.08.2000 n. 267 "Consolidated text of the laws governing local authorities" showing the functions and responsibilities of management.

Given the art. 4 of Legislative Decree 165/2001, as regards the managerial functions of the Public Bodies. Given the art. 35 of the Statute of the Province of Alessandria.

Given the Decree of the President of the Province of Alessandria n. 64 of 17/04/2018 Prot. No. 28111 of 04/16/2018 with which the body's macrostructure was adapted.

Given the Decree of the President of the Province of Alessandria n.31 of 14/02/2020 Prot. N. 9620 of 02/14/2020 relating to the extension of the executive position to Eng. Claudio Coffano.

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Given the Service Order of the Director of the Environmental Management OSAP2 - 3 - 2019 Prot. Prov. TO THE. n. 49237 of 07/25/2019 "Environment and Territorial Planning Department - Internal organizational structure - personal location - assignment of specific responsibilities".

Given the L.R. n. 44 of 26/04/2000 "Assignment of administrative functions and duties of the State to the Regions and local Bodies, in implementation of Chapter I of the law 15 March 1997 n. 59 "and in particular articles 36 and 50.

Given the art. 3 of the L.R. n. 24 of 24.10.2002 "Rules for the management of waste (competence of the Provinces)".

Given the L.R. n. 23 of 29/10/2015 reorganization of the administrative functions assigned to the Provinces in implementation of the law of 7 April 2014 n. 56.

Given the Legislative Decree of April 3, 2006 n. 152 "Environmental Regulations" and subsequent amendments
Seen the Ministerial Decree 05/02/98 and as amended

Given the DGR n. 20-192 of 12 June 2000 and subsequent amendments showing criteria and methods for presenting and using the financial guarantees provided for the disposal and recovery of waste pursuant to Legislative Decree 22/97 (now Legislative Decree 152/2006 and subsequent amendments).

Given the DDAP2 - 118 - 2018 Prot. N. 39818 of 31/05/2018 relating to the Verification of V.I.A. pursuant to art. 19 of Legislative Decree 152/2006 and subsequent amendments which shows the exclusion from the V.I.A. of the plant in question.

Given the request Prot. Prov. AL no. 80408 of 17/12/2019 presented to the Province of Alessandria by the company Ecoplasteam S.p.a. with registered office in Milan - Via Monte di Pietà 21, and operational headquarters in Alessandria - Fraz. Spinetta Marengo - Via Gambalera 180, for the operation of a special non-hazardous waste recovery plant consisting of mechanical preparation waste in the production of pulp from waste paper and cardboard CER 030307, for the construction of a plastic material called EcoAllene®. The instant firm is currently already authorized with AUA for the production of plastic polymers after using paper mill by-products consisting of the residual plastic / aluminum fraction of the so-called "tetrapack" packaging. The polymer obtained from the current processing is called EcoAllene®. and is covered by a European patent. The request concerns the insertion into the already existing production cycle of a similar input matrix, however made up of waste. In particular, this is the pulper waste from the paper mill identified with CER 030307 composed mainly of the plastic and metal (aluminum) fraction almost entirely deprived of the cellulosic fraction. The product matrix of the waste basically follows that of the by-product currently used.

Given that:

a) with note Prot. no. 81374 of 20/12/2019 the Province of Alessandria initiated the above procedure and convened the Conference of Services on 23/01/2020 communicating, inter alia, to the Bodies and Provincial Services concerned:

b) that since it is a single authorization, pursuant to art. 208 paragraph 6) of Legislative Decree 152/2006 and subsequent amendments, any other visa, opinion, authorization and concession of regional, provincial and municipal

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bodies issued to the company Ecoplasteam S.p.a. by the interested Bodies or Provincial Services should have been integrated into the authorization provision pursuant to Art. 208 of Legislative Decree 152/2006 and subsequent amendments;

c) that, given the decision-making nature of the Services Conference, pursuant to article 14 ter paragraph 7 of Law 241 of 07/08/1990 and subsequent amendments, the unconditional consent would have been considered acquired of the Administration whose representative had not definitively expressed the will of the Administration represented.

a) following the above Conference of Services, whose report Prot. no. 4562 of 23/01/2020 refers in full, the need arose to request some additions in order to complete the preliminary investigation.

Given the additions transmitted by the company Ecoplasteam S.p.a. on 30/12/2019 Prot.Prov.AL n. 132 of 02/01/2020 and subsequently with note Prot. Prov. AL no. 7107 of 04/02/2020.

Given that following the presentation of the above integrations, the Province of Alessandria, with the note Prot. Prov. AL no. 7350 of 05/02/2020, restarted the procedure and convened the II Conference of Services on 10/03/2020.

Considering that, following the emergence of the health emergency due to the onset of COVID19 which imposes restrictive safety measures and in compliance with the consequent national decrees issued by the government that prohibit gatherings, the Province of Alessandria provided, with note Prot. Prov. AL no. 14380 of 05/03/2020 to suspend the terms of the procedure again and to postpone the conference of the services to a date to be destined, and subsequently, with the note Prot. Prov. AL no. 15523 of 11/03/2020, proceeded to restart the terms of the procedure and to convene the conference of the services referred to in the previous point, asynchronously, pursuant to art. 14 bis of Law 241/90, with request for opinions by 21/03/2020.

Seen the opinions received and collected in the minutes Prot. Prov. At no. 18458 of 25/03/2020 which refers in full, from which the positive outcome of the investigation emerges.

In particular:

Given the joint technical contribution of the Waste Management Service of the Province of Alessandria and ARPA, Prot. N. 11931 of 25/02/2020 which shows the compatibility of the proposed activity with the current legislation on End Of Waste pursuant to the new formulation of art. 184 ter of Legislative Decree 152/2006 and subsequent amendments on the subject of cessation of the refusal qualification and authorization for the production of EOW on a case by case basis.

Given the technical contribution established by the Approval of the Prevention and Management Plan for Meteoric Runoff and Washing Waters of the external areas no. 119/18 Prot. No. 1206 GR / mc of 09/19/2018 and from the authorization to deliver to the public sewer n. 35/18 Prot. No. 989 GR / mc of 06/08/2018, issued to the company Ecoplasteam S.p.a. by AMAG Reti Idriche as sewer manager, which are acquired as an attachment to this provision as it is a single authorization pursuant to art. 208 paragraph 6) of Legislative Decree 152/2006 and subsequent amendments, which must be integrated with any other authorization issued to the company Ecoplasteam S.p.a., by

other bodies or by the provincial services concerned.

Given the opinion Prot. N. 17337 of 18/03/2020 issued by the Energy and Air Quality Protection Service of the Province of Alessandria, containing the provisions relating to the noise impact and the annexes relating to the authorization for emissions into the atmosphere, which are fully acquired internally of this provision as it is a single authorization pursuant to art. 208 paragraph 6) of Legislative Decree 152/2006 and subsequent amendments, which must be integrated with any other authorization issued to the Ecoplasteam company S.p.A. by other Bodies or Provincial Services concerned.

Given the provision DDAP2 - 976 - 2019 Prot. N. 69228 of 10/31/2019 of the AUA pursuant to Presidential Decree 59/2013 on discharges and emissions into the atmosphere, the requirements of which are fully acquired within this procedure as it is a single authorization pursuant to art. 208 paragraph 6) Legislative Decree 152/2006 and subsequent amendments, which must be integrated with any other authorization issued to the company Ecoplasteam S.p.a. by other Bodies or Provincial Services concerned.

Having read the art. 208 of Legislative Decree 152/2006 and subsequent amendments;

Given that this Determination was made, pursuant to art. 147 bis of Legislative Decree 267/2000, the administrative regularity check and, with its signature, the issue of the technical regularity opinion.

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to AUTHORIZE pursuant to art. 208 of Legislative Decree no. 152 of 3 April 2006 and subsequent amendments the company Ecoplasteam S.p.A. with registered office in Milan - Via Monte di Pietà n. 21, and operational headquarters in Alessandria - Fraz. Spinetta Marengo - Via Gambalera n. 180 - P. IVA 11643480012 in the person of its Legal Representative Stefano Richaud born in Pinerolo on 23/03/1989, C.F. RCHSFN89C23G674U, for the operation of a non-hazardous special waste recovery plant - CER 030307 - putting [R13] and recovery [R3] activities (Annex C part IV of Legislative Decree 152/06 and subsequent amendments) ", in compliance with current legislation and the requirements set out below.

REQUIREMENTS for the course of the business

POINT A) - Attachments.

The seven annexes identified with the letters A, B, C, D, E1, E2, E3 form an integral part of this act and their content constitutes an authorization prescription. These attachments are made up of the documentation presented by the company during the preliminary investigation and are the subject of the final positive assessments of the competent Bodies and Provincial Services on the basis of which this authorization is issued, or they are made up of documentation provided by the Bodies and Provincial Services involved in the process. The attachments are as follows:

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- Attachment A - Plant plan.

- Attachment B - Approval of the Prevention and Management Plan of Meteoric Runoff and Washing Waters of the external areas n. 119/18 Prot. No. 1206 GR / mc of 09/19/2018 and authorization for delivery to public sewer n. 35/18 Prot. No. 989 GR / mc of 06/08/2018, issued to the company Ecoplasteam S.p.a. by AMAG Reti Idriche as sewer manager, which are acquired as an attachment to this provision as it is a single authorization pursuant to art. 208 paragraph 6) of Legislative Decree 152/2006 and subsequent amendments, which must be integrated with any other authorization issued to the company Ecoplasteam S.p.a., by other bodies or by the provincial services concerned.

- Attachment C - Complete list of Ecoallene® versions produced, relative identification and composition codes.

- Attachment D - Ecoallene® safety data sheet.

- Attachments E - 1 - 2 - 3 Emissions into the atmosphere.

POINT B) - Types and quantities of waste to be disposed of or recovered.

The waste used in the proposed activity consists exclusively of waste resulting from the processing of the tetrapak in paper mill plants. Tetrapak is a poly laminate material made up partly of cellulose (about 70%), partly of polyethylene (about 20%) and minimally of aluminum (max 10%).

After the treatment at the paper mill plants, following which most of the cellulosic fraction is removed, the residual waste, consisting of a poly laminate composed of polyethylene, aluminum and a minimal part of cellulose, is included in the recovery cycle of the company. Ecoplasteam Spa.

It is identified in the CER code 030307 - Mechanical separation waste in the production of pulp from paper and cardboard waste.

The maximum instantaneous total quantity of waste admitted for storage is 97 (ninety-seven) tons.

The maximum total annual quantity of waste admitted to the plant is 6,000 (six thousand) tons.

POINT C) - Authorized treatment and recovery method, equipment used and authorized activities and specific requirements relating to the production of raw materials through a waste recovery operation.

1) The authorized activity, without prejudice to the provisions contained in this document, must be carried out following the operating procedures described in the technical documentation presented by the company and assumed by the Province of Alessandria to the following protocols:

- Prot. Prov. AL no. 80408 of 17/12/2019;

- Prot. Prov. AL n. 132 of 02/01/2020;

- Prot. Prov. AL no. 7107 of 04/02/2020.

This technical documentation is referred to in its entirety.

Waste treatment process.

The waste treatment process is the same as that already used by Ecoplasteam S.p.a. for the production of plastic polymers after using paper mill by-products consisting of the residual plastic / aluminum fraction of the so-called "tetrapack" packaging. The polymer obtained from the current processing is called EcoAllene®. and is covered by a European patent. The request concerns the insertion into the already existing production cycle of a similar input matrix, however made up of waste. The product matrix of the waste basically follows that of the by-product currently used.

The waste referred to in CER 030307, coming from the paper mills, arrives at the plant in tied bales. The average composition of the waste is 50% polyethylene, 25% aluminum, 1% cellulose with 24% humidity.

After being checked visually, the waste bales are freed from the iron wire and are transferred to the loading pit with a forklift.

The pit built in steel is positioned inside a pit in c.a. waterproofed and resinated, obtained in the floor. It is equipped with conveyor belts, one of which is inclined for the transport of waste.

Then, the material is sent to a manual inspection belt where the operators carry out the visual inspection and possible interception of foreign bodies, to prevent any small stones or pieces of metal from damaging the mill present in the next phase.

After the manual inspection, the material is immersed in water in a settling tank that allows impurities (tiny foreign bodies not intercepted in the previous phase) to sink.

An extractor belt periodically and automatically discharges the decanted impurities.

The separation of impurities from the plastic material to be recovered takes place through mechanical procedures; the first energetic washing action occurs during grinding with a water mill using a 50 mm grid.

The water circulating inside the mill is continuously filtered and then recycled. Subsequently, through a screw, the material is transferred to another intensive washing equipment, called FrictionWasher.

The final washing of the ground surface is carried out by the FrictionWasher through a continuous process. Through an intense flow of water, the ground coffee is subjected to a strong friction which allows the extraction of the residual cellulose fibers and the subsequent rinsing of their surface.

The rinsing is completed inside a special tank, where the material is cleaned of any last remaining impurities that have been separated by the action of the Turbo Washer.

In this tank, the water is continuously renewed at 30% with clean water and 70% with purified water from the plant's treatment system.

After a further rinsing, the material is transferred to a drying press for a first mechanical drying stage and then, with a pneumatic conveying system, sent to a dryer for a second drying stage with hot air. In this drying phase, a continuous flow of steam is generated which is extracted from the work environment. For this purpose there is an extraction duct that conveys to a demolition system outside the building. The steam is previously treated in a cyclone for the separation of any polyethylene particles ("confetti") which are recovered and placed at the head of the production cycle. After the drying phase, the ground coffee is transported to a large 20 m³ storage silo. From this silo, an extractor belt feeds the agglomerator / compactor, a unit that deals with increasing the apparent density of the ground by transforming it into flakes (agglomerate) from 0.3 to 0.5 Kg / dm³. Now the material can be easily handled, stored and mixed before the extrusion process. After agglomeration, a pneumatic conveying system transfers the material to two mixing silos, each having a capacity of 10 m³. Its operation gives

rise to a steam emission which, like the previous one, is conveyed to the blast chiller. Again, the emission of steam is previously treated in a cyclone. In order to avoid further dispersion of steam into the environment, on the occasion of the opening of the agglomerator, a dedicated extractor hood is installed equipped with flat filters and connected by a suitable duct to the aforementioned blast chiller. The steam emissions described above are conveyed to the outside in an abatement system that provides counter-current washing (SCRUB) for cleaning and cooling the vapors. The cooling water is treated in a closed circuit and any "confetti" present, deriving from the filtration process of the same, are returned to the production cycle. Both silos of the agglomeration section can feed the extrusion line through a "cascade" process.

A gravimetric control doser feeds a single screw extruder directly connected to a special "planetary section", where a strong separation action is applied to the base material, necessary to reduce the fraction of aluminum to the required dimensions.

At the exit of the "planetary section", in the transition phase to the final "metering" section, a high efficiency degassing system is provided.

The "metering" section is based on a special co-rotating twin-screw extruder which offers the possibility of perfectly adding and mixing the mineral fillers to the base material.

For a better mixing of high percentages of mineral load, two lateral feeders and an additional degassing area have been provided for the evacuation of any humidity present in the charges.

The suitably mixed material is filtered and granulated in a granulation group (03.08) with hot water overhead cutting. The product obtained is a new plastic polymer, Ecoallene®, perfectly balanced and with constant technical characteristics, which in turn can be colored and economically competitive with comparable virgin materials. It can be used with great quality of adaptation in various industrial sectors for the production of products made with the technology of injection molding, extrusion, lamination and rotational technology.

In the cutting phase, the contact between hot material and water from steam origin which is conveyed to the outside by means of an extractor hood equipped with flat filters connected to a duct that flows beyond the coverage of the building.

The granules produced in the previous section are transported to the final Big Bag filling station through a pneumatic conveying system, where the product, after electronic weighing, is packaged for sale.

1) The authorized operations must be carried out exclusively at the plant described above and through the use of the plants detailed in the following list:

- 01.01 In-ground loading hopper.
- 01.02 Inclined belt for feeding from the pit to the manual inspection belt
 - 01.02.1 Draining drum for level control on the inclined belt
- 01.03 Manual inspection belt to check the quality of the material
- 01.05 Settling tank to eliminate any impurities from the incoming material flow
- 01.06 Water mill for the dimensional reduction of the material
- 01.07 Drainage auger for material transfer
- 01.08 FrictionWasher for adequate washing of the material
- 01.09 Inclined unloading auger for the extraction of the material from the FrictionWasher
- 01.10 Washing for the intense rinsing of the flakes and the separation of any further impurities
- 01.11 Inclined transport auger for material transfer

- 01.12 Rotary disc separator and water recirculation for filtering water from impurities
- 01.13 Rinse and settling tank for rinsing the material and final settling of impurities
- 01.14 Drainage auger for material transfer
- 01.15 Drying press for a first mechanical drying stage
- 01.16 Pneumatic transport for material transfer
- 01.17 Dryer for a second drying stage with hot air
- 01.18 Pneumatic transport for material transfer
- 01.19 Steam evacuation from dryer
- 01.10 Electric control system for automatic control of the machines
- 02.01 Warehouse for light material to store the material
- 02.02 Agglomerator to agglomerate the material, increasing its apparent density
- 02.03 Steam cleaning system for reducing fumes from agglomerator
- 02.04 Unloading hopper to collect the material and to dose the pellets to the subsequent transport system.
- 02.05 Pneumatic transport for the transport of the material
- 02.05b Steam suction pipe from agglomerator
- 02.05c Extractor hood (and relative duct) from agglomerator.
- 02.06 Mixing silos for the storage and mixing of the material.
 - 02.06.1 Additional extraction auger for the extraction of the material from the mixing silos
- 03.01 Gravimetric dosing system for dosing the material in the extruder
- 03.03 Twin-screw co rotating extruder to add and mix additives and extrude the material in granules.
- 03.06 Single-screw extruder for extrusion and reduction of the aluminum fraction
 - 03.06.2 Hydraulic filter changer with oversized filter section for filtering the extruded material
- 03.07 Filter hood and steam evacuation duct from extruder
- 03.08 Granulation group with overhead cutting in water to obtain granules
- 03.09 Electrical power and control panel for automatic control of the extruder
- 04.01 Pneumatic conveying for material handling
- 04.02 Mixer silo for mixing the material
- 04.03 Filling station for n. 2 Big Bags for bagging the material

The modification or replacement of the aforementioned machinery must be previously communicated to the Waste Management Service of the Province of Alessandria in order to establish whether there is a need to modify the authorization act.

1) The activity authorized by the company consists of:

- [R13] - storage of waste for submission to one of the operations indicated from R1 to R12.
- [R3] - recycling / of organic substances not used as solvents.

In particular, the R3 recovery activity concerns the insertion into the already existing production cycle of the pulper waste from the paper mill identified with CER 030307 composed mainly of the plastic and metal (aluminum) fraction deprived of the cellulosic fraction almost entirely. The product matrix of the waste basically follows that of the by-product currently used.

The waste management activity meets the sector technical regulations (Ministerial Decree 05/02/98 point

6.1 and / or 6.2) only as regards the methods for carrying out the actual recovery cycle. The legislation provides for the placing in reserve [R13] for the production of secondary raw materials for the plastics industry, by removing foreign substances (if any), treatment for obtaining plastic materials compliant with Uniplast-Uni specifications 10667 and for the production of plastic products in the forms usually marketed [R3].

The plant is equipped to carry out all the working phases necessary for the cycle as it foresees, through machines interconnected in series on the production line, all activities from the selection and washing of materials (and possibly waste) to extrusion and drawing for the pellet reduction of the polymer called Ecoallene®.

Waste identified with CER 030307 is entered at the entrance, not covered by the Ministerial Decree 05/02/98 for the recovery activity in question (Ministerial Decree 05/02/98 point 6.1 and / or 6.2).

Furthermore, as regards the final product obtainable from the proposed activity in the project, the UNIPLAST-UNI 10667 specifications are not applicable, a requirement instead prescribed by the reference standard. In particular, the polymer obtained downstream of the recovery operations is made up, in variable percentages and in a homogenized form, of both the plastic fraction of the tetrapack and the aluminum fraction, so the specifications mentioned above are not applicable as a technical reference for the characteristics of the product obtained. In light of this premise, the application was assessed pursuant to art. 184 ter of Legislative Decree 152/2006 regarding the cessation of the qualification of refusal and authorization for the production of EOW on a case by case basis. The legislation provides that in the absence of specific criteria adopted pursuant to paragraph 2 of the same article, the authorizations referred to in articles 208, 209, 211 and referred to in title III-bis of the second part of the decree, for the performance of recovery, are issued (or renewed) in compliance with the conditions referred to in article 6, paragraph 1 of Directive 98/2008 / EC and on the basis of detailed criteria, defined within the same authorization procedures, which include:

- a. incoming waste materials admissible for recovery purposes;
- b. permitted treatment processes and techniques;
- c. quality criteria for materials that have ceased to qualify as waste obtained from the recovery operation in line with the applicable product standards, including limit values for polluting substances, if necessary;
- d. requirements so that the management systems demonstrate compliance with the criteria relating to the cessation of the waste qualification, including quality control, self-monitoring and accreditation, if applicable;
- e. a requirement relating to the declaration of conformity.

a - With regard to criterion a) CER 030307 is compatible by analogy, by origin and composition with the waste allowed by the Ministerial Decree 05/02/98 to the recovery activity in points 6.1 and 6.2. In fact, these are wastes consisting of composite food packaging, with a predominantly plastic matrix, originally subject to separate collection and already subjected to a first processing (in the pulper plants of the paper mill) through which the cellulosic fraction is removed, which in the cycle under examination is definitely to be considered unwanted. The chemical-physical product characteristics of the waste, also in light of the original use of the packaging from which it is generated, given the homogeneity of the supply chain of origin (the plant only recovers pulp waste deriving

from tetrapack for which it has entered into specific commercial agreements), are to be considered free of danger.

b - As regards criterion b) the activity is suitable both as regards the composition of the plant and the related processing phases.

c - With regard to criterion c) the use of the EN 71-3: 2013 + A3: 2018 certification relating to the migration of certain elements and the chemical requirements for the safety of toys as per European Directive 2009/48 is considered suitable /THERE IS. This certification is to be considered a basic requirement for the compatibility of the polymer with the normal industrial uses to which it can potentially be destined. In particular, if the material is suitable for the production of toys, it can also be reasonably considered compatible with the other industrial uses typical of plastic polymers. In this regard, refer to Annex C - Complete list of Ecoallene® versions produced, relative identification codes and composition and to Annex D - Ecoallene® Safety Data Sheet.

d - Regarding the quality criteria of each single type of Ecoallene®, the following internal procedures must be followed:

- COMPANY MANAGEMENT SYSTEM - traceability of the recycling chain upstream of Ecoplasteam.
- COMPANY MANAGEMENT SYSTEM - mass balance and traceability procedure.
- PROCESS MANAGEMENT SYSTEM - process control procedure.

The documentation relating to the management system must be kept in the factory available to the control bodies. In the event of substantial changes to the management system referred to, written notification must be given to the Province of Alessandria for the purpose of evaluating the case.

Products made with Ecoallene® cannot be intended for human consumption.

Since the plant treats batches of raw material / by-product alternatively and batches of waste, whenever it is used to treat waste, it must then be reclaimed before the treatment of the raw material / by-product.

The waste management activity must be organized in homogeneous batches whose maximum quantity cannot exceed the volume that can be stored in the EOW BATCH VERIFICATION AREA (60 m²).

The checks necessary to establish the suitability of the recovered product must be carried out on each batch, based on the criteria identified in point c) above. Compliance with EN 71-3: 2013 + A3: 2018 must also be checked as a basic precautionary requirement.

All documentation (e.g. periodic reports, recipe formulation, analytical reports, etc.) divided by each batch, must be kept at the operational headquarters for at least 5 years and shown in the event of a check.

The different production batches must be kept separate and must be identifiable from the moment of entry, entry of the waste lot into the plant, up to the production of the finished product.

The Company is not subject to the registration obligations of substances provided by the EC Regulation n. 1907/2006 (REACH) for producers and importers of substances and articles intended to release substances during use, as a downstream user of substances, mixtures and articles and in turn producer of articles not intended to release substances during the foreseeable use. However, the related verification obligations of the aforementioned conditions remain in relation to any variation on the supplies received or on their own production cycle.

e - Regarding the criterion e) the instant company must produce for each batch of EOW a declaration of conformity, pursuant to articles 47 and 38 of the Presidential Decree December 28, 2000, no. 445, certifying compliance with the conditions and criteria required above in points a), b), c) and d) for the termination of the qualification of refusal.

The compliance form must contain the following minimum sections:

- company name of the producer;
- characteristics of the substance / object that ceases to qualify as waste;
- the quantification of the reference lot;
- analytical test reports for compliance with technical, environmental and health standards, in addition to the wording of the reference Ecoallene®. It is recalled that the analytical methods to be used must be certified and recognized by the scientific world and / or at European level.
- product safety sheet. This form must be completed for each production batch and must be kept at the operating site and exhibited in case of inspection.

POINT D) - General requirements for safety and environmental hygiene.

1 - The waste treated in the plant cannot be stored for a period exceeding 12 months.

2 - The authorized storage and processing of waste must only be carried out in the authorized areas. The storage, storage and treatment of waste must be carried out inside the industrial warehouse and on the areas best identified in the plan referred to in Annex A. The waste entering the plant must be kept separately and orderly with respect to the raw materials and by-products used, as better indicated in the planimetric representation.

3 - The waterproofed area on which the authorized activity must be carried out, as well as the water collection and regulation network must be subject to continuous maintenance such as to guarantee the initial set-up conditions and to guarantee the protection of the soil and subsoil with collection and treatment of rainwater and wastewater. The inspection and sampling wells must be made accessible at all times and indicated in appropriate signs.

4 - The waterproofed area on which the authorized activity must be carried out, as well as the water collection and regulation network must be subject to continuous maintenance such as to guarantee the initial set-up conditions and to guarantee the protection of the soil and subsoil with collection and treatment of rainwater and wastewater. The inspection and sampling wells must be made accessible at all times and indicated in appropriate signs.

5 - In order to disclose the nature and danger of the waste, all containers and storage areas must be marked with labels or plates indicating the CER code and the description of the waste; these marks must be clearly visible in terms of size and location.

6 - All waste produced by the activity carried out and held under temporary storage must be kept in accordance with the provisions of art. 183, c. 1, lett. bb, Legislative Decree 152/2006 and subsequent amendments, identified by suitable signage, and managed according to current legislation on environmental protection and public health. They must also be kept separate from the waste entering the plant.

7 - the areas provided for the storage of waste cannot be used for the storage of recovered raw materials or other material, which must be stored separately as indicated in the plan referred to in Annex A to this deed.

8 - In order to avoid access to non-professionals, the operational headquarters, and in particular the industrial warehouse, where the activity is permitted, must be kept adequately closed both at night and in the absence of the personnel.

9 - The Company must guarantee the regular cleaning of the operational site subject to storage and waste treatment and must take all the necessary measures to avoid the dispersion of dust and odors and disturbing noises in the surrounding environment and in the work environments . Any disinfection and rat extermination interventions as well as the methods and frequency of these operations, the products used and the periods of the year must be agreed with the offices of the ASL responsible for the territory.

10 - The internal traffic of the system must be guaranteed, in easy and safe conditions, at all times of the year.

11 - The plant and the activity must comply with the provisions of the fire regulations, and in particular the activity must be carried out in compliance with the specific fire authorizations issued or by the Provincial Command of the Alessandria Fire Brigade, which, if modified, must be sent in copy to the Province of Alessandria.

12 - When operating the plant, the environmental and hygiene-health criteria established pursuant to the current provisions of the law on environmental protection and public health and workers must be respected; accidental loss or abandonment of waste must be avoided, pollution of the soil and subsoil and the formation and dispersion of polluting or toxic emissions into the atmosphere as well as the formation and dispersion of unpleasant odors and dust must be avoided.

13 - The operators involved in the work referred to in the object must be adequately trained and informed in accordance with the provisions of current legislation on safety and health in the workplace, and must be equipped with adequate personal protective equipment (PPE) . Work risks must be included in the risk assessment document to be drawn up pursuant to art. 28 Legislative Decree 81/08 and as amended, or considered in the self-certification provided for by art. 29, paragraph 5, of the same Decree.

14 - Reference is made to DDAP2 - 118 - 2018 Prot. No. 39818 of 31/05/2018 relating to the Verification of V.I.A. pursuant to art. 19 of Legislative Decree 152/2006 and subsequent amendments and the provisions contained therein.

POINT E) - Water Resources.

The company must comply with the provisions of the D.P.G.R. February 20, 2006 n. 1 / R as modified with D.P.G.R. August 2, 2006 n. 7 / R and with D.P.G.R. December 4, 2006 n. 13 / R on the subject of "Discipline of rainwater and washout water from external areas (L.R. 29 December 2000 n. 61)".

Furthermore, what is expressly contained in Annex B - Approval of the Prevention and Management of Meteoric Runoff and Washing Water from external areas must be respected.

n. 119/18 Prot. No. 1206 GR / mc of 09/19/2018 and authorization for delivery to public sewer n. 35/18 Prot. No. 989 GR / mc of 06/08/2018, issued to the company Ecoplasteam S.p.a. by AMAG Reti Idriche as sewer manager, which are acquired as an attachment to this provision as it is a single authorization pursuant to art. 208 paragraph 6) of Legislative Decree 152/2006 and subsequent amendments, which must be integrated with any other authorization issued to the company Ecoplasteam S.p.a., by other bodies or by the provincial services concerned.

The following provisions regarding water discharges deriving from the provision DDAP2 - 976 - 2019 Prot. N. 69228 of 10/31/2019 of the AUA pursuant to Presidential Decree 59/2013:

TECHNICAL REQUIREMENTS FOR THE DISCHARGE OF WASTEWATER IN PUBLIC SEWERAGE
(article 3.1 letter a) DPR 59/2013 - articles 124 and following, chapter II, title IV, section II, third part of Legislative Decree 152/2006 and subsequent amendments)

- 1) the wastewater must comply with the limits of Table 3, Annex 5, Part III of Legislative Decree 152/06 for discharges into the sewer;
- 2) without prejudice to the obligation to comply with the provisions of the General Sewerage Regulations of the A.T.O. n. 6 Alessandrino (<http://www.ato6alessandrino.it/index.php?idinfo=20>);
- 3) a complete analysis of all the parameters included in Table 3 Annex 5 part III of Legislative Decree 152/06 and subsequent amendments for sewage discharges to be submitted at the same time as the report of the water discharged by January 31 of each year must be carried out;
- 4) the analyzes must be carried out by public or private laboratories authorized to do so. The originals must be kept at the company for a period of 5 years. In the event of analyzes that do not comply with the table limits, immediate notification must be given to the public sewer operator. The possibility of carrying out checks at any time by the relevant Services remains unaffected;
- 5) a four-year period must be sent to the Public Sewer Manager if it declares that there have been no qualitative and / or quantitative changes to the drain and changes to the settlement;
- 6) Since the production activity has not yet started, the stress is obliged to communicate to the sewer manager at least 15 days in advance from the start of the start date of the production activity itself.
- 7) The company must send a complete analysis of all the parameters included in Table 3 Annex 5 part III of Legislative Decree 152/06 and subsequent amendments for sewage drains within 90 days from the start of

production;

8) the Company is bound to comply with the provisions of Part Three of Legislative Decree 152/2006 and subsequent amendments with particular regard to the provisions referred to in Articles 133 to 140 inclusive of the aforementioned standard, as well as to the provisions of Law 68/2015 and subsequent amendments.

POINT F) - Acoustic Impact.

TECHNICAL REQUIREMENTS FOR ACOUSTIC IMPACT (article 3 paragraph 1 letter e) Presidential Decree 59/2013 - communication or clearance pursuant to Law 447/1995)

1)the Company must ensure compliance with the following noise pollution regulations:

- Law 26 October 1995, n. 447: Framework law on noise pollution
- Prime Ministerial Decree of 1st March 1991: Maximum limits of exposure to noise in residential environments and in the external environment
- Prime Ministerial Decree of 14 November 1997: Determination of limit values for sound sources
- Regional Law of 20 October 2000, n. 52: Provisions for environmental protection with regard to noise pollution
- D.G.R. 2/2/2004, n. 9-11616: L.R. n. 52/2000, art. 3, paragraph 3, letter c). Criteria for drafting the acoustic impact documentation;

2)the Company must also ensure compliance with the rules contained in the Definitive Acoustic Classification Measure of the Municipality where the plant is subject to authorization, checking within 6 months of publication on the B.U.R. the notice of approval of the aforementioned Measure or its modification of the compatibility of the noise emissions generated with the limit values established by it and, if necessary, adapting; or, within the same term, by submitting a special recovery plan to the Province of Alessandria, as indicated in paragraph 1 art. 14 LR 52/2000;

3)Although not expressly mentioned in this deed, the Company is required to comply with the provisions imposed by the sector legislation with particular regard to Law 447/1995 and to Regional Law 52/2000, as well as to the provisions of Law 68/2015. In particular, the activity subject of this technical prescription is subject to the sanctioning regime indicated in the aforementioned laws.

POINT G) - Atmospheric emissions.

Please refer to Attachments E1 - E2 - E3 relating to the authorization for emissions into the atmosphere, which are acquired in full within this provision as it is a single authorization pursuant to art. 208 paragraph 6) of Legislative

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Decree 152/2006 and subsequent amendments, which must be integrated with any other authorization issued to the company Ecoplasteam S.p.a. by other Bodies or Provincial Services concerned.

POINT H) - Location of the system.

The waste management activity can only be carried out in the areas listed in the NCT sheet 177 particle 80 of the Municipality of Alessandria Industrial Zone D5 Via Gambalera 180.

POINT I) - Requirements for safety measures, plant closure and site restoration.

The emergency plan, remediation, safety, closure of the plant and restoration of the operational headquarters must be carried out according to what is stated in the technical report relating to the exercise of the waste management activity, point 11, presented by the company and registered by the Province of Alessandria Prot. Prov. TO THE n. 80408 of 17/12/2019. This technical documentation is referred to in its entirety.

POINT L) - Financial guarantees.

The Company is obliged to present or adapt (if already in place), within 60 (sixty) days of notification of this deed, pursuant to Legislative Decree 152/06, of the L.R. 24/2002 and of the D.G.R. n.20-192 of 12/06/2000 and as amended, a specific insurance policy or bank guarantee as a financial guarantee, in favor of the Province of Alessandria, for the authorized waste management activities and for any negative effects on the environment caused by it.

The amount and the methods of presentation are those provided by the Piedmont Region with resolution of the Regional Council n. 20-192 of 12/06/2000 and as amended.

POINT M) - Expiration of the authorization.

This authorization is issued pursuant to art. 208 of Legislative Decree 152/2006 and subsequent amendments and is valid for 10 (ten) years from the date of issue. This deadline is extended to all authorizations that become part of this deed. All the measures absorbed by this deed and without expiry, in the absence of changes to what has already been authorized / approved, will be again attached as they are when the present Executive Determination is renewed.

The applicant must communicate with 30 days' notice to the Province of Alessandria and to the bodies responsible for checking the cessation of the activity in question.

The Single Environmental Authorization measure DDAP2 - 976 - 2019 Prot. No. 69228 of 10/31/2019 already issued to the company pursuant to Presidential Decree 59/2013 on discharges and emissions into the atmosphere, is fully replaced by this deed and will lose effectiveness upon acceptance of the financial guarantees referred to in the previous POINT L).

POINT N) - Other requirements.

1 - The Company must notify the Province of Alessandria - Environment and Territorial Planning Department of any changes to its business or any changes in name, company name, registered office or legal representative, except for the obligation to request new authorizations where necessary.

2 - The company is required to respect and comply with the community, national, regional and provincial laws in force, as well as to comply with and comply with the administrative documents relating to the matters covered by this executive decision, issued by the Province of Alessandria in date following the issue to the company of the authorization pursuant to art. 208 of Legislative Decree 152/2006 and subsequent amendments However, the Company is obliged to comply with any new or supervening legislative provisions on matters subject to this authorization.

3 - The effectiveness of this authorization is subject to any further fulfillment and / or authorization provision necessary for the performance of the company's activity, deriving from legislation other than that on waste management, as well as the responsibility of different entities and / or subjects from the Province of Alessandria, as well as from the Province itself outside the waste sector. In this case, any of the aforementioned deeds must be absorbed by this deed pursuant to art. 208 paragraph 6 of Legislative Decree 152/2006 and subsequent amendments Therefore, considering all of the above, the company Ecoplasteam S.p.a. must submit a specific request for modification of this deed, unless otherwise provided by the Province of Alessandria.

4 - Any event subsequent to the date of this authorization that modifies the complete availability of the authorized places will result in the suspension of the authorization.

5 - Any event that changes the suitability of the applicant of the company will result in the suspension of the authorization.

6 - This provision must be kept, even in copy, at the operational headquarters.

7 - As of the closure of the plant, the authorized person is responsible for any harmful event that may occur, pursuant to current civil and criminal legislation, within the prescription limits set by it.

Although not expressly provided for in this authorization, reference is made to Legislative Decree 152/2006 e subsequent amendments as well as the provisions referred to by it and issued in implementation of the same.

This authorization is subject to suspension, modification or revocation, if it arises from dangerous elements or harmfulness of the activity carried out, or in cases of ascertained violation of the law, of the technical regulations, of the regulations or of the provisions referred to in this provision .

However, the Province remains empowered to arrange all the necessary additions to guarantee the correct exercise of waste management operations.

This digitally signed Executive Determination is kept in the archive of the digitized documents in accordance with current legislation (Legislative Decree no. 82/2005 "CAD" as amended by Legislative Decree no. 235/2010 articles 43 and 44 bis "Digital preservation in accordance with the digitized documents to ensure that they are opposable to third parties").

Stamp duty paid by stamp duty of Euro 16.00 bearing the identification number 01160484065672 in the possession of the authorization holder.

Against the final provision, it is possible for anyone interested to appeal to the Piedmont Regional Administrative Court within 60 days of full knowledge of the act.

The Director of the Environment and Spatial Planning Department
Ing. Claudio COFFANO

(This document is signed, omitting the holographic signature, exclusively with a digital signature pursuant to articles 20 and 21 of Legislative Decree 82/2005 which attribute full probative value)