



FRAPORT TAV ANTALYA TERMINAL MANAGEMENT C.O.



WASTE WATER MANAGEMENT PLAN

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DOCUMENT REVISION FOLLOW UP FORM

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P01	Operational Definitions		0.1	16/09/2022
P02	Water Quality Measurements Updates		1.1	23.12.2022
P03	First draft		1.2	07/04/2023
P04	Final draft incorporating FTA comments		1.3	05/05/2023
P05	Final draft incorporating FTA comments		1.4	24/05/2023
P06	Revised in according to water consumption amount in current well permits		1.5	19/02/2024
P07	Mott MacDonald updates ahead of operation phase commencing (Q1 2025)	All	2.0	31/01/2025
P08	Mott MacDonald updates ahead of operation phase commencing (Q1 2025)	All	3.0	01/04/2025
P09	Addition of Sothern WWTP & Operations	All	4.0	31/03/2026

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1. PURPOSE

This Wastewater Management Plan (WWMP) has been developed as part of the Antalya Airport Expansion Project. The Project involves the expansion of Antalya Airport as part of a multi-phased work program to accommodate future passenger traffic and aircraft movements. FTA was awarded the tender for the operation of Antalya Airport ("AYT") for 25 years from 2027 to 2051. The Joint Venture will increase the capacity of AYT and obtain a new concession for its operation.

The financing for Phase I of these planned works is provided by the "Lenders". The existing passenger terminals and related facilities are operated under a concession until January 1, 2027, by Fraport TAV Antalya Terminal İşletmeciliği A.Ş. (FTA) as the Project Sponsor. The part of FTA that focuses on terminal operations is referred to as "FTA1".

Another part of FTA is organizationally separate from FTA1 and is responsible for financing and construction works for FTA - this organization is referred to as FTA2. Following the completion of the ongoing construction works for the expansion of Terminal 2 (T2) and the Domestic Terminal by FTA2 in early 2025, the terminals will be operated by FTA1 until early 2027. After January 1, 2027, FTA1 and FTA2 will merge and operate the terminals.

The purpose of the plan is to manage compliance controls from wastewater generation to discharge to the receiving environment, and impacts on wastewater and ambient water from all activities, in order to minimize impacts on human health and the environment in FTA area of responsibility.

2. SCOPE

The FTA's Project Management Office (PMO) (FTA2) appoints and supervises an Engineering, Procurement and Construction (EPC) Contractor to deliver these construction works on behalf of the airport owner, the Turkish General Directorate of State Airports Authority ("DHMI" - Devlet Hava Meydanları İşletmesi Genel Müdürlüğü). Once the Project has been completed, FTA2 will merge with FTA1 and retain responsibility for the management of passenger-focused assets. Any aspects that are not controlled by FTA during the operational phase will be handed over to DHMI as part of their operational obligations.

This report considers only water-related areas and employees that fall under FTA's operational responsibility. Under this plan, in addition to the existing operational airport, the FTA's operational responsibilities areas¹:

Terminal Buildings

- Operation of T2 International Terminal Building and T4 Domestic Terminal building (this would be a new terminal to the south of existing domestic terminal) including baggage handling facilities (both arrivals and departures systems), passenger boarding bridge (PBB), FTA offices, security check points, security, and IT systems.
- Operation of CIP and VIP Terminal buildings.

¹ The new fuel farm site, due to its distinct operational and logistical characteristics, falls outside the boundaries of this plan and is therefore not included within its scope.

Car parks

- Operation of multistorey car park (east of existing domestic terminal). This will include a helicopter landing pad on the roof.
- Operation of flat car parks.

Energy Center

- Operation of trigeneration system, emergency generators, boilers, chillers, service/potable water supply and heating/cooling water supply.

Landside Areas

- Irrigation of Landscape responsibility for FTA.

Miscellaneous Facilities

- Mosque, Police Station, DHMI Headquarter, Catering Area.

This Plan has been developed in accordance with FTA policies, commitments undertaken by FTA in the IMS, the requirements of the local regulatory framework, EBRD Performance Requirements (especially PR3) and IFC Performance Standards (especially PS3). The Plan considers the adoption of Good International Industry Practices (GIIP) where no national regulations or international standards/rules are applicable. The Plan covers wastewater generation in relation to operational areas of responsibility, as listed above.

3. ABBREVIATIONS

AIIB	Asian Infrastructure Investment Bank
AHU	Air Handling Units
CAP	Correction Action Plan
CLO	Community Liaison Officer
DHI	Accredited laboratory
DHMI	Devlet Hava Meydanları İşletmesi Genel Müdürlüğü (in Turkish) The Turkish General Directorate of State Airports Authority (in English)
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
EPC	Engineering, Procurement and Construction
ESHS	Environmental, Safety, Health and Sustainability

ESMS	Environmental and Social Management System
ESMP	Environmental and Social Management Plan
ESIA	Environmental and Social Impact Assessment
ESAP	Environmental and Social Action Plan
Fraport TAV	Fraport TAV Antalya Terminal Management
FTA	Collaboration between Fraport and TAV Airports Holding Co
GIIP	Good International Industry Practice
GWD	Groundwater Directive
HR	Human Resources
HVAC	Heating Ventilating and Air Conditioning
IFC	International Finance Corporation
IMS	Integrated Management System
OHS	Occupational Health and Safety
PMO	Project Management Office
PS	Performance Standard
PR	Performance Requirement
SC25	Drinking and Potable Water Disinfectant
SEP	Stakeholder Engagement Plan
SDS	Safety Data Sheet
TKEDY	No abnormal change acceptable to consumers or any abnormal change
Top Management	General Manager at Fraport TAV
T1, T2, T3	Terminal 1, Terminal 2, Terminal 3
HAPS	Hangar Area Power Substaion
AYT3PS	Power Substation 3
NPC	New Power Center
EDC	Electric Distiribution Center

GTB	General Aviation Technic Building
GAT	General Aviation Terminal
HC3	Heating Center-3 (For Terminal-2 Expansion)
DKE	State Guesthouse
VIP	VIP
CP	Multi Storey Carpark
WHO	World Health Organisation
WFD	Water Framework Directive
WMP	Water Management Plan
WWMP	Waste Water Management Plan
WWTP	Waste Water Treatment Plant
WAS	Waste Activated Sludge
RAS	Return Activated Sludge

4. RELATED DOCUMENTS

- Environmental and Social Management System Guide
- Pollution Prevention and Monitoring Procedure
- Wastewater Treatment Operating Instructions
- Wastewater Treatment Report Book
- Treatment PH Values Monitoring Form
- 8.46KY.1.05 - Audit Procedure

5. LEGAL FRAMEWORK

This WWMP ensures compliance with the legal and regulatory framework governing wastewater management at Antalya Airport. It aligns with national and international standards, including those set by financial institutions, aviation authorities, and environmental regulations.

International Legal Framework

- IFC Performance Standard 3 (PS3) - Resource Efficiency and Pollution Prevention
- World Bank Group Environmental, Health, and Safety Guidelines (General and Airports-specific, 2007).
- EU Directive 91/271/EEC on Urban Wastewater Treatment and Directive 98/15/EC (amendment)
- EU Groundwater Directive 2006/118/EC
- EBRD Environmental and Social Policy, specifically:
- Performance Requirement 3 (PR3): Pollution Prevention and Abatement
- AIIB Environmental and Social Framework, focusing on environmental management and resource efficiency.

- ISO 14001:2015 – Environmental Management System

Turkish National Legal Framework

- Environmental Law No. 2872
- Water Pollution Control Regulation (WPCR)
- Regulation on Wastewater Discharges to Sewerage System
- Regulation on the Protection of Groundwater Against Pollution and Deterioration
- Regulation on Control of Pollution Caused by Hazardous Substances in Aquatic Environment
- Groundwater Law No. 167
- Watershed Protection and Control Regulation
- Regulation on Environmental Audit
- Regulation on Environmental Permit and License

6. ROLES AND RESPONSIBILITIES

Roles and responsibilities are outlined based on functions of relevance to water management.

6.1 Environmental Engineer (FTA) Responsibilities

The Environmental Engineer of FTA, as the designated responsible person, shall oversee the implementation and continual improvement of the WWMP. Responsibilities under this Plan include:

- Ensuring that the WWMP is fully integrated into the overall Environmental and Social Management System (ESMS) and complies with national regulations, IFC Performance Standards (especially PS3), EBRD Performance Requirements (especially PR3), and relevant GIIP such as the IFC General EHS Guidelines.
- Overseeing the operation and maintenance of the wastewater treatment plant, including ensuring appropriate staffing, training, and resources for wastewater management.
- Ensuring that wastewater discharge parameters are regularly monitored and remain within the limits defined by national regulations and the EU Urban Wastewater Treatment Directive.
- Reviewing and endorsing the annual review and any updates to the WWMP based on audit results, monitoring data, and operational feedback.
- Ensuring that corrective actions arising from audits, incidents, or regulatory inspections are implemented in a timely and effective manner.
- Coordinating with the Technical Department and Quality Department to ensure responsibilities are clearly defined and carried out for the monitoring, reporting, and evaluation activities outlined in the WWMP.
- Ensures proper functioning of infrastructure (pumping stations, sensors, treatment units) and organizes maintenance
- Responsible for day-to-day operation of the wastewater treatment plant, monitoring discharge quality, and preparing internal reports.

6.2 Functional Responsibilities

FTA has assigned departments or specialized employees within the organization to monitor Environmental and Social Responsibility, Human Resources, Occupational Health and Safety (OHS), Community Liaison and other specific areas.

- Quality Manager – Responsible for overseeing audits, management reviews, and ensuring corrective actions are completed.
- Community Liaison Officer (CLO) – Manages external communications with authorities and lenders related to wastewater performance and grievances.
- Environmental Chief – Managing external communication, including engagement with regulatory authorities and lenders on matters related to wastewater compliance, through the FTA Community Liaison Officer (CLO).
- WWTP Technician – Carries out sampling, testing, and recording of wastewater parameters as per regulatory and plan requirements.

7. WASTE WATER MANAGEMENT PRACTICES

All wastewater generated within the jurisdictional boundaries of Fraport TAV Antalya Airport Operation is managed in accordance with the provisions of the Ministry of Environment, Urbanization and Climate Change Urban Wastewater Treatment Regulation and the provisions of the EU Urban Wastewater Treatment Directive under IFC-EBRD PS3-PR3.

Within the scope of the Environmental Permit and License Regulation, the Environmental Permit for Air Emission and Wastewater Discharge was obtained on 29.12.2025. The environmental permit for the discharge of wastewater continues for 5 years, until 29.12.2030.

Additionally, a South Wastewater Treatment Plant with a capacity of 200 m³/day has been commissioned in the Hangar Area for domestic and aircraft wastewater. Within the scope of the Environmental Permit and Licensing Regulation, there is a wastewater discharge permit valid for 5 years, from 31.12.2025 to 31.12.2030.

7.1 Types of Wastewater

All domestic wastewater and wastewater from airplanes are treated at the wastewater treatment plant located within the airport and discharged to the receiving environment.

Rainwater is collected and drained underground to the receiving environment or to Aksu Stream. Wastewater and rain lines are designed separately. Rainwater does not drain to the wastewater treatment plant.

Industrial wastewater is collected within the airport with the help of vacuum trucks and transported to be treated at industrial wastewater treatment plants.

a) Domestic Wastewater

Domestic wastewater is generated as a result of sanitary use in Terminals, Official Institution Buildings, restaurants, catering areas, main airport entrance, CIP, VIP and Cargo areas.

b) Waste Water From Aircraft

Aircraft wastewater is considered domestic polluted water that is generated as a result of sanitary use in the aircraft and is discharged into the airport sewage line.

c) Industrial Wastewater

Wastewater from industrial sources cannot be treated in a domestic wastewater treatment plant as it would not meet discharge parameters in terms of pollution concentration. Generally, industrial wastewaters have high chemical content, difficult biodegradability and require special treatment techniques.

d) Storm Water

Where storm water is generated from adverse weather conditions, from terminal buildings, apron areas and parking areas, it is discharged to the receiving environment by underground drainage and canals.

7.2 Collection of Domestic Waste Water

At Antalya Airport facilities, degreased sewage wastewater is transferred to the wastewater treatment plant by pumps from 20 main pumping stations located in different regions.

Figure 1. Location of main pumping stations



Pumping stations:

1. Main Guard Station Pumping Station
2. Housing Chemical Treatment Pumping Station
3. Housing Pumping Station
4. T1 Parking Lot Pumping Station
5. Security Service Building Pumping Station
6. Dog Training Center Pumping Station
7. DHMİ Head Office Pumping Station
8. Heat Center Pumping Station
9. Mosque Pumping Station
10. T3 Apron Pumping Station

11. T3 Land Side Pumping Station
12. B Gate Pumping Station
13. T2 East Block Pumping Station
14. T2 Solid Waste Pumping Station
15. T2 Parking Lot Pumping Station
16. YKS (New Power Plant) Pumping Station
17. IM3 (Heat Center 3) Pumping Station
18. GAT Chemical Treatment Pumping Station
19. GAT Pumping Station
20. Wastewater Treatment Main Pumping Station

- The wastewater generated in **the main gate and police station** comes to the pumping station located next to the building. From this point, it is transferred to the pumping station located at the T1 Parking Lot exit point with pumps. From the T1 Parking Lot pumping station, it is transferred to the heat center pumping station with pumps and from the heat center, it is transferred to the wastewater treatment plant with pumps.
- The wastewater collected in **Terminal 1** is conveyed by gravity to the heat center pumping station and from the heat center to the wastewater treatment plant by pumps.
- The wastewater generated by **the DHMI lodgings, fuel farm, lodging house guardhouse, D gate buildings** from sanitary or washing sources comes to the pumping station located next to the lodgings with its own flow. From this point, it comes to the pumping station located at the exit point of T1 Parking Lot with pumps. From the T1 Car Park pumping station, it is transferred to the heat center pumping point with pumps. It is transmitted from the heat center pumping station to the treatment center with pumps.
- The wastewater generated by the sanitary or washing wastewater of **the state guesthouse, VIP buildings** comes to the pumping station located at the exit point of the T1 Parking Lot with its own flow. It is conveyed from the T1 Car Park pumping station to the heat center pumping point with pumps. It is transmitted to the treatment center with pumps from the heat center pumping station.
- The wastewater generated by **DHMI head office** sanitary or washing wastewater comes to the pumping station located next to the head office with its own flow. From this point, it is transmitted to the treatment center with pumps.
- The wastewater generated by the **mosque's** sanitary or washing wastewater comes to the pumping station located next to the mosque with its own flow. From this point, it is transferred to the Chief Directorate pumping station with pumps. From the Chief Directorate pumping station, it is transferred to the treatment center with pumps.
- Wastewater from the **police service building** is collected at the pumping station located next to the building. From this point, it is transferred to the treatment center with the help of pumps.
- Wastewater from **the dog training center building** is collected at the pumping station located next to the building. From this point, it is transferred to the treatment center with the help of pumps.

- **Terminal 4, Gate A, Gate B's** sanitary or washing wastewater comes to the pumping station located in front of Gate B with its own flow. From this point, it is transmitted to the treatment center with pumps.
- All wastewater collected in **the catering area** is conveyed to the wastewater treatment plant by gravity.
- Wastewater collected in **Terminal 2** area is conveyed to the wastewater treatment plant by gravity. Wastewater generated from sanitary or washing wastewater in **Terminal 2 east area** comes to Terminal 2 east block pumping station with its own flow. It is conveyed to the treatment center with pumps from the pumping station.
- Sanitary or washing wastewater accumulated in **T2 Waste Separation area** comes to T2 Solid Waste pumping station with its own flow. From this point, it comes to T2 Parking lot pumping station with pumps. It is delivered to the treatment center with pumps from the T2 Car Park pumping station.
- The wastewater collected in the **T1 Heating Center, T2 Energy Center and DHMI Transportation Building** area is conveyed to the wastewater treatment plant via a pumping line in its own flow.
- Wastewater generated in the **new power center** area is collected at the pumping station located next to the building. From this point, it is transferred to the treatment center with the help of pumps.
- **AYT3KS** building wastewater comes to the treatment center through the newly constructed wastewater line with its own flow.
- **HC3** building wastewater is collected at the pumping station located next to the building. From this point, it is transferred to the treatment center with the help of pumps.
- The wastewater generated from the sanitary or washing of the **multi storey car parking building** comes to the heat center pumping station with its own flow. It is transmitted from the pumping station to the treatment center with pumps.
- The sanitary or washing wastewater of **GAT, HAPS, GTB, Cargo Buildings, Hangars** comes to the chemical pumping station located in front of the biological treatment near this area with its own flow. From this point, the water, which turns into surface water as a result of chemical treatment processes, goes to the storm water open channel with pumps.

7.3 Wastewater from airplanes

Wastewater generated from aircraft is collected by ground handling companies and discharged into the Northern Wastewater Treatment Plant located on the T1 apron, adjacent to the staff accommodation facilities. The Northern Wastewater Treatment Plant functions as a pumping station, and no discharge to the receiving environment occurs at this stage. The wastewater passes through a coarse screen in the collection chamber by gravity flow and is then conveyed to the adjacent pumping station. From there, it is pumped to the chemical treatment unit. The treated effluent is transferred via overflow to the pumping station serving the staff accommodation facilities. Subsequently, it is conveyed by pumps to the pumping station located at the T1 car park exit. From this point, the wastewater is pumped to the central pumping station at the heating centre. Finally,

from the central pumping station, the wastewater is conveyed to the Central Wastewater Treatment Plant for further treatment.

Pre-treatment Applications in Waste Water Line

Wastewater collected within the boundaries of Fraport TAV Antalya Airport's jurisdiction undergoes pre-treatment before reaching the wastewater treatment plant. At the required points on the wastewater line, there are sieves for the separation of solids and oil traps for the separation of oils. The control and cleaning procedures applied at the pumping stations and wastewater treatment plant are detailed in the Wastewater Treatment Operating Instructions.

There are sieves at the entrance of the lodging house sewage line and wastewater treatment plant for solid (coarse) materials. The solid materials kept in these screens are sent to disposal by licensed transportation vehicles.

Oil traps are located at the outlet sections of the airport waste water lines. Waste oil pulps collected in the grease traps located in the wastewater line and wastewater treatment plant are cleaned at regular intervals and sent to disposal by licensed transportation vehicles.

Figure 2. Overview of the wastewater collection system.



7.4 Collection of Storm Water

The storm water collected at Fraport TAV Antalya Airport is drained underground or into the Aksu Stream with the help of manholes and canals. Underground drainage of storm water is carried out with 80-85 meter drainage pipes. Storm water collected in the canals is drained into the Aksu Stream.

Rainwater is separated from wastewater, to comply with the requirement to avoid the dilution of wastewater under the Regulation on Water Pollution Control. Rainwater is conveyed and collected in the following manner around the site:

- Rainwater from **the main gate and police station** goes into the surrounding soil area.
- **Terminal 1** rainwater lines are conveyed to the open channel and drained to Aksu Stream.

- **Terminal 2** rainwater is collected by means of the crenellations around the buildings and open channels around the parking lot. It is drained underground through the groundwater wells located in Terminal 2.
- **Terminal 3** (domestic flights) both apron and landside rainwater lines are conveyed to an open channel and drained to Aksu Stream.
- The rainwater of **DHMI lodgings, fuel farm, lodging lodging, gate D buildings** are conveyed to the open channel and drained to Aksu Stream.
- The rainwater from **the state guesthouse and VIP buildings** is conveyed to the open canal and drained into Aksu Stream.
- Rainwater from **the police service building, dog training center, T1 Heating Center, T2 Energy Center, HC3, AYT3PC, NPC, EDC** buildings is drained underground from the nearby groundwater wells.
- The rainwater from the buildings of **Terminal 4, Gate A, Gate B** is conveyed to the open canal and drained to Aksu Stream.
- Rainwater from the buildings in **the catering area** is conveyed to the open channel and drained into Aksu Stream.
- Rainwater collected by open channels throughout the airport is drained into Aksu Stream.

Figure 3. Overview of the waste water collection system.

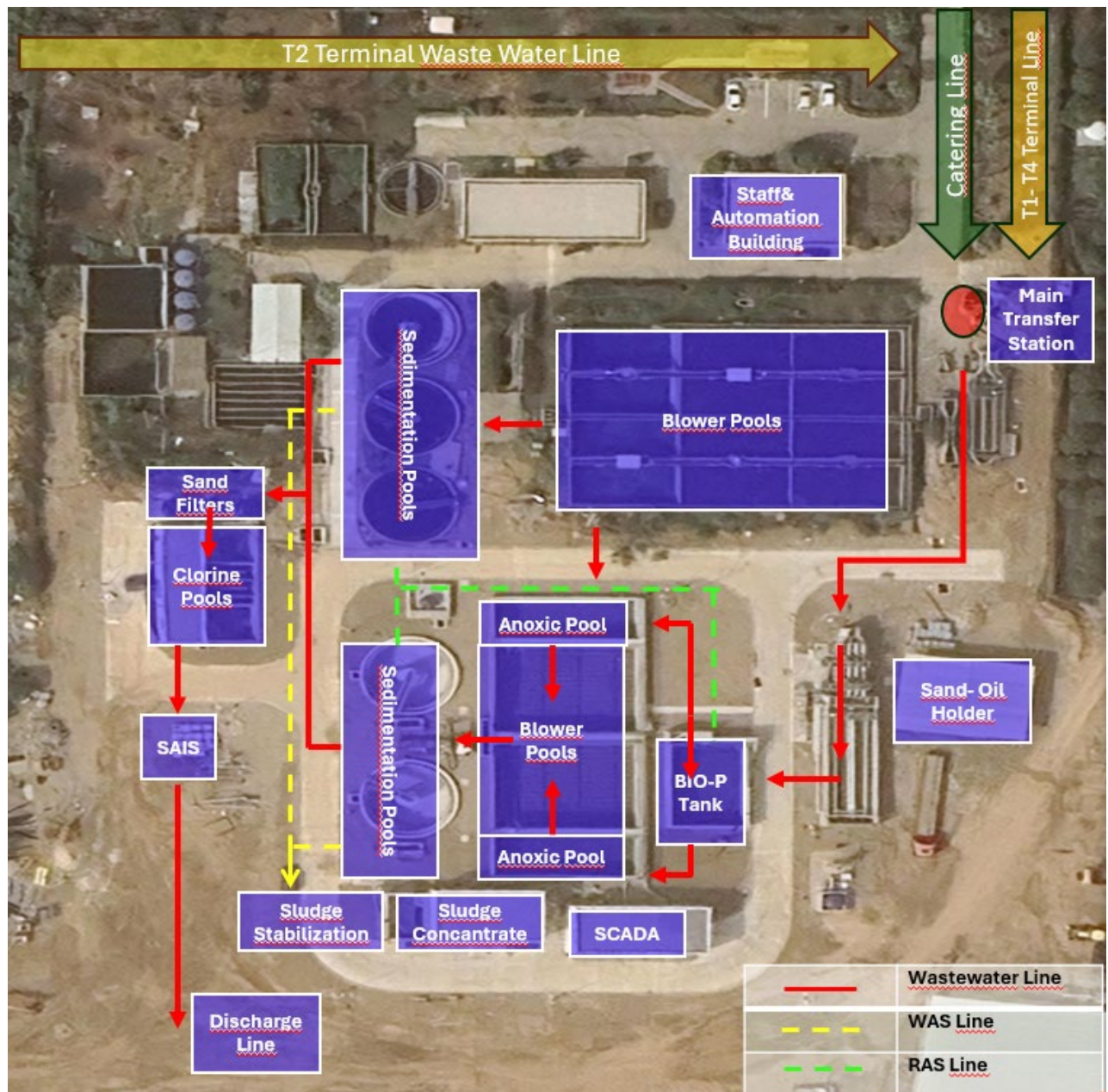


(Note – green lines show storm water collection points)

7.5 Operation of Main Waste Water Treatment Plant

Fraport TAV Antalya Airport has put into operation an advanced biological (tertiary) wastewater treatment plant with a treatment capacity of 7,500 m³/day for the management of domestic wastewater. All domestic wastewater generated at Antalya Airport is treated at this facility. Detailed operational procedures and guidelines for the wastewater treatment plant are provided in the Wastewater Treatment Operating Instructions.

Figure 4: Plan of the Main Wastewater Treatment Plant



The 120 m³/day facility for the treatment of aircraft “blue water” (e.g., toilet wastewater) and the total 200 m³/day wastewater treatment plant serving the new southern apron area have been commissioned during the planned operational stage. Currently, the blue water is chemically treated and discharged into the existing wastewater treatment plant. The wastewater treatment plant serving the southern apron area has obtained an Environmental Permit for wastewater discharge under the Environmental Permit and License Regulation, issued on 31.12.2025 and valid until 31.12.2030, allowing discharge to the receiving environment

The provisions and principles within the Regulation on Water Pollution Control (SKKY) are to be complied with. This includes compliance with limit values in Annex 1 of SDGPLRM, Article 6 of SDHCPD, and limit values in Annex 5 of SDGPLRM. In addition, the provisions of Article 11 of the Environmental Permit and Licence Regulation (EILR) are to be complied with in relation to any changes to be made in the facility.

7.6 Discharge of Waste Water

Wastewater treated at the facilities is discharged into the receiving environment in compliance with the discharge limit values defined under the Water Pollution Control Regulation and aligned with the requirements of International Finance Corporation Performance Standard 3 (PS3) and European Bank for Reconstruction and Development Performance Requirement 3 (PR3).

Main Wastewater Treatment Plant (>5,000 m³/day)

Due to its treatment capacity exceeding 5,000 m³/day, the plant is subject to the provisions of the Regulation on Continuous Wastewater Monitoring Systems.

Accordingly, a Continuous Wastewater Monitoring System (SAIS) is installed at the discharge point, enabling real-time monitoring and recording of key parameters including COD, TSS, pH, temperature, conductivity, and dissolved oxygen. Monitoring data are recorded and tracked in accordance with regulatory requirements.

South Wastewater Treatment Plant (51–200 m³/day)

At the outlet of the plant, internal monitoring is conducted through sampling every two months. In addition, compliance monitoring is carried out by the Ministry at a minimum frequency of once every six months. If compliance with discharge standards is confirmed through three consecutive sampling results within the first year, monitoring of parameters other than pH, COD, BOD, Oil & Grease, and TSS may be reduced to once per year, subject to written notification to the Ministry. If any parameter fails to comply with discharge standards, monitoring shall continue in accordance with the frequencies defined under the applicable legislation in the subsequent year.

7.7 Treatment Plant Maintenance

The wastewater treatment plant will be maintained to minimise the risk of malfunction or failure to meeting standards. Should a malfunction or treatment failure occur, then the will be notified immediately and action taken to rectify the fault.

Where treatment capacity is increased or stopped, either temporarily or permanently, then the is to be notified immediately.

7.8 Disposal of Sludge

The treatment sludge and solids accumulated in the wastewater treatment plant or screens are, following the commissioning of the new facility, collected by, a company holding an Environmental Permit and License, and managed for processing as Refuse-Derived Fuel (RDF).

8. MONITORING

Wastewater treated at the wastewater treatment plant must be analysed and meet certain parameters before discharge. The treated wastewater from the Main Wastewater Treatment Plant (WWTP) is monitored prior to discharge to ensure compliance with applicable discharge standards and permit requirements.

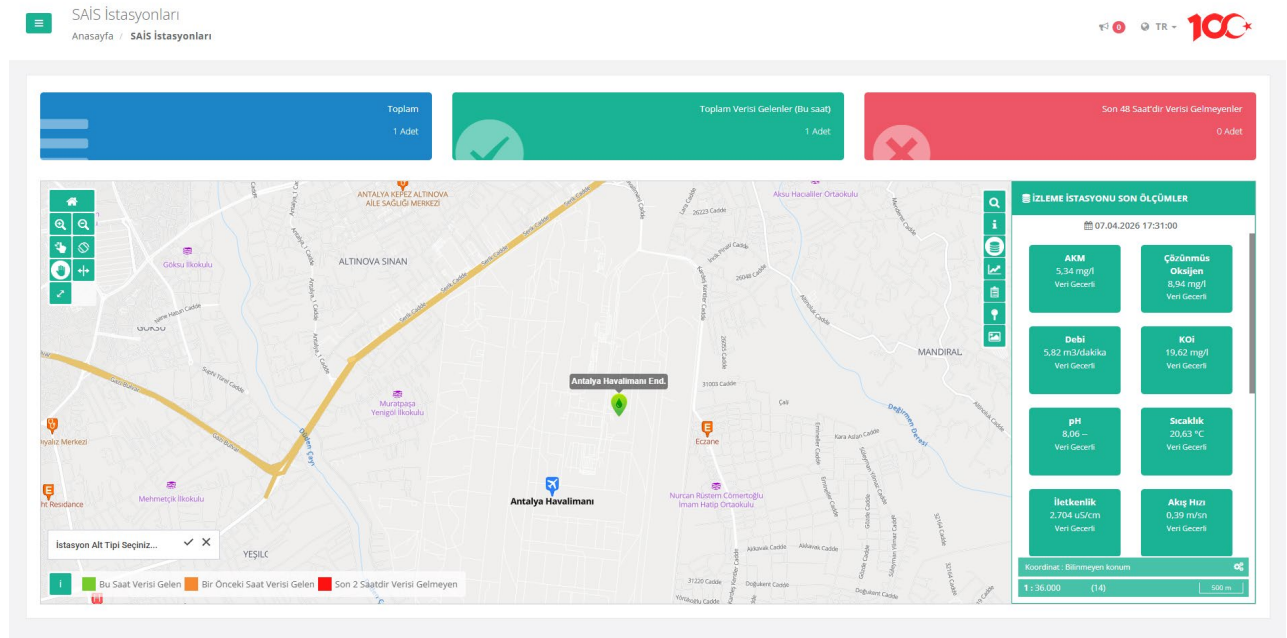
8.1. Main Wastewater Treatment Plant – Monitoring

The Main Wastewater Treatment Plant (WWTP), with a capacity exceeding 5,000 m³/day, is subject to the requirements of the Regulation on Continuous Wastewater Monitoring Systems. Within this scope, monitoring activities are carried out through three complementary approaches: continuous online monitoring, periodic laboratory analyses, and verification/calibration tests.

8.1.1. Continuous Online Monitoring (SAIS)

Within the scope of the SAIS system, key operational parameters including Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Dissolved Oxygen (DO), conductivity, and pH are continuously measured at the effluent point, recorded, and monitored online. This enables real-time tracking of discharge quality, and in case of any non-compliance, the Ministry of Environment, Urbanization and Climate Change is informed instantly.

Figure 6: Continuous Wastewater Monitoring Center System Interface



8.1.2. Sensor Calibration and Data Verification

To ensure the accuracy of the SAIS monitoring system, sensor calibration and data verification processes are carried out through integrated comparison tests conducted twice per year by accredited laboratories under the coordination of the Provincial Directorate of Environment. These tests are performed in accordance with Table 1 of the Urban Waste Water Treatment Regulation Annex 4.

The results obtained are expected to be in agreement with laboratory measurements within a $\pm 10\%$ deviation margin.

Table 1: Wastewater Discharge Parameters according to Regulation on Urban Waste Water Treatment.

Parameters	Concentration (mg/l)
Without nitrification ¹ Biochemical oxygen demand (BOD ₅ at 20°C)	25
Chemical Oxygen Demand (COD)	125
Total Suspended Solids (TSS)	35
	35 Article 8 (c) (more than 10000 Equivalent Population) 60 Article 8 (c) (2000-10000 Equivalent Population)

*Urban Waste Water Treatment Regulation Annex 4

8.1.3. Periodic Laboratory Analyses (Table 2 Parameters)

Parameters that cannot be continuously monitored under SAIS, namely Total Nitrogen (TN) and Total Phosphorus (TP), are defined under Table 2 of the Urban Wastewater Treatment Regulation.

These parameters are analysed on a monthly basis by accredited laboratories under the supervision of the Provincial Directorate of Environment, in line with environmental permit and licence requirements.

Table 2: Wastewater discharge parameters according to the EU Urban Wastewater Treatment Directive.

Parameters	EU Urban Waste Water Treatment Directive (91/271/EEC) Limits for population < 100000
BOD	25 (mg/L)
COD	125 (mg/L)
TSS	35 (mg/L)
TN	15 (mg/L)
TP	2 (mg/L)

Urban Waste Water Treatment Regulation Annex 4

8.2. Southern Wastewater Treatment Plant – Monitoring

At the Southern Wastewater Treatment Plant, internal monitoring analyses are conducted every two months by an accredited laboratory in accordance with Table 1 of the Urban Waste Water Treatment Regulation Annex 4 to ensure compliance with applicable discharge standards.

Regular sampling and monitoring is carried out for wastewater discharged from the wastewater treatment plant in accordance with the discharge license conditions. In addition, the pH value is monitored daily by Fraport TAV technicians. The general operation and monitoring activities of the wastewater treatment plant are detailed in the Wastewater Treatment Operation Instruction.

8.3. Other Monitoring

In addition to chemical and physical parameters, the temperature of discharged wastewater shall be measured regularly to verify compliance with the IFC General EHS requirement that limits thermal variation to a maximum of 3°C above ambient conditions at the discharge boundary.

The results of all water monitoring, analysis and reporting is to be kept in digital format for a minimum of 5 years. This is to comply with monitoring requirements within the Regulation on Water Pollution Control (Article 54). The Table 3 below details the monitoring (measuring) activities defined for the Wastewater management.

WASTE WATER MANAGEMENT PLAN
Wastewater Monitoring Plan

ID	Source Doc.	Description of Monitoring Action/measure	Frequency / Timing	KPI	Target/ Acceptance criteria	Responsibility
WWTP_01	Local Legislation No.27527, 20/03/10 IFC PS3, EBRD PR3	Recording the amount of treated water discharged underground and the pH parameter.	Continuous	Amount (m ³) pH	pH(6-9)	Technical Department
WWTP_02	Local Legislation No.27527, 20/03/10 IFC PS3, EBRD PR3, BP	Collection and disposal of solid wastes segregated in wastewater collection lines and at the inlet of wastewater treatment plant	Continuous	n.a	Transportation and disposal documents	Technical Department
WWTP_03	Local Legislation No.27527, 20/03/10 IFC PS3, EBRD PR3, BP	Collection and disposal of waste oil pulp collected in Wastewater collection lines and oil traps at the inlet of Wastewater Treatment Plant	Continuous	n.a	Transportation and disposal documents	Technical Department
WWTP_04	Local Legislation No. 26047, 08.01.2006 EU Urban Wastewater Treatment Directive IFC PS3, EBRD PR3, BP	Analysis of discharged treated water by accredited laboratories	Monthly	Urban Waste Water Treatment Regulation Annex 4 Table 1 and EU Urban Waste Water Treatment Directive	Table 1 of the Urban Wastewater Treatment Regulation and the limit values specified in the EU Urban Waste Water Treatment Directive	Technical Department
WWTP_05	Local Legislation No.27527, 20/03/10 – No.25687, 31/12/2004 – No.30847, 30/07/2019 IFC PS3, EBRD PR3, BP	Evaluation of Waste Water Treatment plant operation within the scope of Environmental Law and Regulations (Environmental Officer site visit)	Twice a month	n.a	General functioning evaluation	Technical Department Quality Department
WWTP_06	Main WWTP Regulation on Continuous Wastewater Monitoring Systems	Confirmation of compliance with regulatory discharge limits.	Continuous	100% compliance with regulatory limits	As per the limits set out in Table 1 of this Plan	Technical Department

WASTE WATER MANAGEMENT PLAN

	Main WWTP Regulation on Continuous Wastewater Monitoring Systems	Confirmation of sensor calibration and data verification processes	Twice a year	100% compliance with regulatory limits	Laboratory measurements is expected within a $\pm 10\%$ deviation margin	Technical Department
	Main WWTP Urban Waste Water Treatment Regulation Annex 4 (Table 2) EU Urban Waste Water Treatment Directive (91/271/EEC) Limits for population < 100000	Confirmation of compliance with regulatory discharge limits.	Monthly	100% compliance with regulatory limits	As per the limits set out in Table 2 of this Plan	Technical Department
WWTP_07	Southern WWTP Urban Waste Water Treatment Regulation Annex 4 (Table 1)	Confirmation of compliance with regulatory discharge limits.	Every two months	100% compliance with regulatory limits	As per the limits set out in Table 1 of this Plan	Technical Department

9. AUDIT AND REVIEW

The correct implementation of this plan shall be verified through internal audits and monitoring in accordance with the requirements of the "Internal audit" section of the "ESMS manual and 8.46KY.1.05-Audit Procedure.

The schedule, frequency, scope and objectives of the audit and the responsible internal auditors will be specified in the Audit Program, which will be developed and updated by the Quality Department.

Internal audit will cover the following:

- The correct implementation of this Plan;
- The correct and timely implementation of the audit and review system;
- Each of the points set out in the tables in Section 6 (mitigation actions/measures) of this Plan.

The main areas that auditors will specifically address during the audit are given in the Wastewater Treatment Operating Instructions.

The evidence and results of the site visit and audit activities are included in the "Site Observation Reports" and "Corrective Actions" records.

Fraport TAV Management reviews the site visit, audit results and the progress of Corrective actions and takes additional appropriate measures if necessary.

This plan shall be reviewed annually to ensure alignment with evolving regulatory requirements, operational practices, and environmental performance results. Revisions shall be documented in the document revision form and distributed to all relevant personnel.

10.REPORTING

Evidence of the implementation of Actions/Measures (detailed in section 7 of this plan) and related results are collected through site visit and audit activities as detailed in section 9 "audit and review" of this plan; this evidence is described in audit and site observation reports.

Fraport TAV is responsible for collecting Environment, Health and Safety statistics, which will include the number of environmental incidents, spills/spills and training statistics. Fraport TAV will also monitor daily records of wastewater management activities. If any Subcontractor is involved, they are responsible for the proper implementation of the requirements contained in the supplier's instructions under the supervision of FTA.

The findings and monitoring activities observed during the audit and site visits will be reported to the lenders in an annual monitoring report.

11. EXECUTION AND REVISION

The Technical Department is responsible for the preparation of the Wastewater Management Plan, and responsible for its execution as a whole, the Quality Department is responsible for its revision, publication and distribution when necessary, and its cancellation in case of abolition. All management/employees are responsible for keeping this plan in the departments, announcing it to the personnel and acting in accordance with the principles of the plan.