

建设项目环境影响报告表

(污染影响类)

项目名称：昆山扩庄智能装备有限公司塑料制品制造项目

建设单位（盖章）：昆山扩庄智能装备有限公司

编制日期：2022 年 11 月

中华人民共和国生态环境部制

一、建设项目基本情况

建设项目名称	昆山扩庄智能装备有限公司塑料制品制造项目		
项目代码	2210-320583-89-05-947241		
建设单位联系人	章**	联系方式	181*****40
建设地点	昆山市千灯镇鹿场路 468 号 12 号房		
地理坐标	(31 度 13 分 54.7248 秒 , 121 度 3 分 20.5056 秒)		
国民经济行业类别	C2929 塑料零件及其他塑料制品制造	建设项目行业类别	二十六、橡胶和塑料制品业 29—53 塑料制品业 292—其他；
建设性质	☒ 新建（迁建） ☐ 改建 ☐ 扩建 ☐ 技术改造	建设项目申报情形	☒ 首次申报项目 ☐ 不予批准后再次申报项目 ☐ 超五年重新审核项目 ☐ 重大变动重新报批项目
项目审批（核准/备案）部门（选填）	昆山市行政审批局	项目审批（核准/备案）文号（选填）	昆行审备（2022）40 号
总投资（万元）	200	环保投资（万元）	10
环保投资占比(%)	5	施工工期	2 个月
是否开工建设	☒ 否 ☐ 是：_____	用地（用海）面积（m ² ）	1300
专项评价设置情况	对照《建设项目环境影响报告表编制技术指南（污染影响类）（试行）》中表1，本项目无需开展专项评价		
规划情况	昆山市 F04 规划编制单元控制性详细规划，见附图 4		
规划环境影响评价情况	无		
规划及规划环境影响评价符合性分析	本项目位于昆山市千灯镇鹿场路468号12号房，根据出租方（昆山世昊木业有限公司）所提供的土地证、房权证以及《昆山城市总体规划（2017-2035）》 本项目所使用场地为工业用地；根据昆山市F04规划编制单元控制性详细规划，该地块属于规划中的工业用地。通过对本项目的影响预测分析，项目建成后对周边环境影响较小，不会降低项目区域的环境功能区划，项目选址合理。		

其他符合性分析	1、与产业政策的相符性 本项目为C2929塑料零件及其他塑料制品制造项目，不属于国家发展和改革委员会《产业结构调整指导目录(2019年本)》中鼓励类、限制和淘汰类项目，不属于《江苏省工业和信息产业结构调整限制、淘汰目录和能耗限额》（2015年本，苏政办发〔2015〕118号）中限制、淘汰类项目、不属于《江苏省工业和信息产业结构调整指导目录（2012年本）》及关于修改《江苏省工业和信息产业结构调整指导目录(2012年本)》部分条目的通知(苏经信产业[2013]183号)中规定的限制类，不属于《苏州市产业发展导向目录（2007年本）》中所列禁止、限制和淘汰类项目，亦不属于其它相关法律法规要求淘汰和限制的产业，根据《促进产业结构调整暂行规定》（国发〔2005〕40号），本项目属于允许类项目，因此，本项目符合国家和地方产业政策。 2、与《太湖流域管理条例》相符性分析 ①与《太湖流域管理条例（2011）》相符性 根据《太湖流域管理条例》： 第二十八条禁止在太湖流域设置不符合国家产业政策和水环境综合治理要求的造纸、制革、酒精、淀粉、冶金、酿造、印染、电镀等排放水污染物的生产项目，现有的生产项目不能实现达标排放的，应当依法关闭。 第二十九条新孟河、望虞河以外的其他主要入太湖河道，自河口1千米上溯至5千米河道岸线内及其岸线两侧各1000米范围内，禁止下列行为：（一）新建、扩建化工、医药生产项目；（二）新建、扩建污水集中处理设施排污口以外的排污口；（三）扩大水产养殖规模。 第三十条太湖岸线内和岸线周边5000米范围内，淀山湖岸线内和岸线周边2000米范围内，太浦河、新孟河、望虞河岸线内和岸线两侧各1000米范围内，其他主要入太湖河道自河口上溯至1千米河道岸线内及其岸线两侧各1000米范围内，禁止下列行为：（一）设置剧毒物质、危险化学品的贮存、输送设施和废物回收场、垃圾场；（二）设置水上餐饮经营设施；（三）新建、扩建高尔夫球场；（四）新建、扩建畜禽养殖场；（五）新建、扩建向水体排放污染物的建设项目；（六）本条例第二十九条规定的行为。 已经设置前款第一项、第二项规定设施的，当地县级人民政府应当责令拆除或者关闭。 本项目距离太湖65.2km，非太湖岸线范围内，非入湖河道上溯区域，为三级保护区。距离淀山湖7.1km，非淀山湖岸线范围内。
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	本项目属于塑料零件及其他塑料制品制造项目，项目无生产废水排放，生活污水经市政污水管网排入昆山市千灯琨澄水质净化有限公司，不属于《太湖流域管理条例》规定的禁止行为，因此本项目的建设符合《太湖流域管理条例》的相关规定是相符的。 ②与《江苏省太湖水污染防治条例》的相符性 根据《江苏省太湖水污染防治条例》（2021年修订）第四十三条规定太湖流域一、二、三级保护区禁止下列行为：（一）新建、改建、扩建化学制浆造纸、制革、酿造、染料、印染、电镀以及其他排放含磷、氮等污染物的企业和项目，城镇污水集中处理等环境基础设施项目和第四十六条规定的情形除外；（二）销售、使用含磷洗涤剂；（三）向水体排放或者倾倒油类、酸液、碱液、剧毒废渣废液、含放射性废渣废液、含病原体污水、工业废渣以及其他废弃物；（四）在水体清洗装贮过油类或者有毒有害污染物的车辆、船舶和容器等；（五）使用农药等有毒物毒杀水生生物；（六）向水体直接排放人畜粪便、倾倒垃圾；（七）围湖造田；（八）违法开山采石或者破坏林木、植被、水生生物的活动；（九）法律、法规禁止的其他行为。 根据《省政府办公厅关于公布江苏省太湖流域三级保护区范围的通知》苏政办发[2012]221号文，本项目所在区域为太湖流域三级保护区，不属于上述禁止建设项目，本项目运营过程中无生产废水排放，废水为生活污水。因此本项目不涉及以上禁止行为，符合《江苏省太湖水污染防治条例》（2021年修订）的要求。 3、“三线一单”相符性分析 ①生态保护红线 （1）与江苏省国家级生态保护红线规划的相符性 本项目位于昆山市千灯镇鹿场路 468 号 12 号房，与本项目直线距离最近的江苏省国家级生态功能保护区为北侧的江苏昆山天福国家湿地公园，本项目到其核心区边界的最短距离约 6km，在项目评价范围内不涉及昆山市范围内国家级生态功能保护区，不会导致昆山市辖区内国家级生态空间管控区域生态服务功能下降。因此本项目不违背《江苏省国家级生态保护红线规划》要求。 （2）与江苏省生态空间管控区域规划的相符性 本项目位于昆山市千灯镇鹿场路 468 号 12 号房，与本项目直线距离最近的江苏省生态空间管控区域为南侧的淀山湖（昆山市）重要湿地，本项目到
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	其核心区边界的最短距离约 7.1km，在项目评价范围内不涉及昆山市范围内生态功能保护区，不会导致昆山市辖区内生态空间管控区域生态服务功能下降。因此本项目不违背《江苏省生态空间管控区域规划（苏政发[2020]1 号）》要求。 （3）与《昆山市生态红线区域保护规划》的相符性 根据《昆山市生态红线区域保护规划》，距本项目最近的生态红线区域为“淀山湖（昆山市）重要湿地”，本项目距离淀山湖（昆山市）重要湿地约 7.1km，不在该管控范围内。因此，本工程的建设与《昆山市生态红线区域保护规划》相符。 ②环境质量底线 根据《2021 年度昆山市环境状况公报》，项目区域大气环境中二氧化硫、二氧化氮、PM₁₀、PM_{2.5} 年均值浓度均达到国家二级标准，CO₂ 4 小时平均第 95 百分位数浓度达标，臭氧日最大 8 小时滑动平均值第 90 百分位数浓度均超过《环境空气质量标准》（GB3095-2012）二级标准，超标倍数为 0.08 倍，因此判定为非达标区。 大气超标整改措施：《苏州市空气质量改善达标规划(2019~2024)》做出如下规定：达标期限：苏州市环境空气质量在 2024 年实现全面达标。近期目标：到 2020 年，二氧化硫（SO₂）、氮氧化物（NO_x）、挥发性有机物（VOCs）排放总量均比 2015 年下降 20%以上；确保 PM_{2.5} 浓度比 2015 年下降 25%以上，力争达到 39 微克/立方米；确保空气质量优良天数比率达到 75%；确保重度及以上污染天数比率比 2015 年下降 25%以上；确保全面实现“十三五”约束性目标。远期目标：力争到 2024 年，苏州市 PM_{2.5} 浓度达到 35μg/m³ 左右，臭氧浓度达到拐点，除臭氧以外的主要大气污染物浓度达到国家二级标准要求，空气质量优良天数比率达到 80%。 2021 年度，全市集中式饮用水水源地水质均能达到《地表水环境质量标准》（GB3838-2002）III类水标准；全市 7 条主要河流的水质状况在优~轻度污染之间；全市 3 个主要湖泊中，阳澄东湖（昆山境内）水质符合IV类水标准（总氮IV类），综合营养状态指数为 52.3，轻度富营养；傀儡湖水质符合III类水标准（总氮IV类），综合营养状态指数为 49.5，中营养；淀山湖（昆山境内）水质符合V类水标准（总氮V类）综合营养状态指数为 56.1，轻度富营养；我市境内 10 个国省考断面对照 2021 年水质目标均达标，优III比例为 90%（其中河流断面优III比例保持 100%），均达到年度目标要求；项目地
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	声环境达到《声环境质量标准》（GB3096-2008）3类标准。项目运营期，产生的非甲烷总烃废气经2套二级活性炭吸附处理达标后经2根15米高排气筒（DA001、DA002）排放。生活污水纳入市政污水管网接入污水处理厂处理。噪声源采用减振、隔声、距离衰减等有效降噪。产生的固废分类收集、妥善处置。 ③资源利用上线 本项目拟购置注塑机、搅拌机、粉碎机、空压机、冷却塔等共计40台（条）设备，项目建成后年生产汽车配件65吨、输送配件35吨。本项目年用水量650吨（生活用水450t/a，冷却用水200t/a），折算为标准煤量为0.1232吨（折标系数参考《综合能耗计算通则》GB/T2589-2020，水的折标系数为1.896 tce/万t）；本项目用电50万千瓦时/年，折算为标准煤量为61.45吨（折标系数参考《综合能耗计算通则》GB/T2589-2020，电的折标系数为1.229tce/万kw·h），则本项目总能耗折算为标准煤为61.5732吨，由于本项目用电量用水量较低，能耗少用水用电在供应能力范围内，不会突破区域资源利用上线；本项目不属于《江苏省工业和信息产业结构调整限制、淘汰目录和能耗限额》（2015年本，苏政办发【2015】118号）中限制、淘汰类项目，本项目实施后对苏州市能源消费的增量影响较小，对昆山市能源消费的增量影响较小。 本项目无高耗能设备，项目生产过程中消耗一定量的电等资源消耗，项目资源消耗量相对区域资源利用总量较少，全过程贯彻清洁生产、循环经济理念，严格执行土地利用规划等，项目占地符合当地规划要求，亦不会达到资源利用上线。 ④环境准入负面清单 本次环评对照国家及地方产业政策和《昆山市产业发展负面清单（试行）》环境准入负面清单表进行说明，不在昆山市环境准入负面清单之内，具体见表1-1。 表 1-1 本项目与昆山市产业发展负面清单对照分析 <table><tr><th>序号</th><th>负面清单内容</th><th>是否属于</th></tr><tr><td>1</td><td>禁止《国家产业结构调整指导目录》《江苏省产业结构调整限制、淘汰和禁止目录》《外商投资准入特别管理措施（负面清单）（2019年版）》等法律法规及政策明确的限制类、淘汰类、禁止类项目，法律法规和相关政策明令禁止的落后产能项目，以及明令淘汰的安全生产落后工艺及装备项目。</td><td>否</td></tr></table>	序号	负面清单内容	是否属于	1	禁止《国家产业结构调整指导目录》《江苏省产业结构调整限制、淘汰和禁止目录》《外商投资准入特别管理措施（负面清单）（2019年版）》等法律法规及政策明确的限制类、淘汰类、禁止类项目，法律法规和相关政策明令禁止的落后产能项目，以及明令淘汰的安全生产落后工艺及装备项目。	否
序号	负面清单内容	是否属于					
1	禁止《国家产业结构调整指导目录》《江苏省产业结构调整限制、淘汰和禁止目录》《外商投资准入特别管理措施（负面清单）（2019年版）》等法律法规及政策明确的限制类、淘汰类、禁止类项目，法律法规和相关政策明令禁止的落后产能项目，以及明令淘汰的安全生产落后工艺及装备项目。	否					

	2	禁止化工园区外（除重点监测点化工企业外）一切新建、扩建化工项目。化工园区外化工企业（除重点监测点化工企业外）只允许在原有生产产品种类不变、产能规模不变、排放总量不增加的前提下进行安全隐患改造和节能环保设施改造。禁止设立化工园区内环境基础设施不完善或长期不能稳定运行企业的新改扩建化工项目。	否
	3	禁止在化工园区外新建、改建、扩建、生产《危险化学品目录》中具有爆炸特性化学品的项目。	否
	4	禁止《危险化学品名录》所列剧毒化学品、《优先控制化学品名录》所列化学品生产项目。	否
	5	禁止在化工企业周边建设不符合安全距离规定的劳动密集型的非化工项目和其他人员密集的公共设施项目。	否
	6	禁止尿素、磷铵、电石、烧碱、聚氯乙烯、碱新增产能项目。	否
	7	禁止高毒、高残留以及对环境影响大的农药原药项目，禁止农药、医药和染料中间体化工项目。	否
	8	禁止不符合行业标准条件的合成氨、对二甲苯、二硫化碳、氟化氢、轮胎等项目。	否
	9	禁止在合规园区外新建、扩建钢铁、石化、化工、焦化、建材、有色等高污染项目（合规园区指昆山经济技术开发区、昆山高新技术产业开发区、昆山综合保税区、江苏昆山花桥经济开发区、昆山精细材料产业园）。	否
	10	禁止水泥、石灰、沥青、混凝土、湿拌砂浆生产项目。	否
	11	禁止平板玻璃产能项目。	否
	12	禁止化学制浆造、制革、酿造项目。	否
	13	禁止染料、染料中间体、有机染料、印染助生产项目（不包括鼓励类的染料产品和生产工艺）。	否
	14	禁止电解铝项目（产能置换项目除外）	否
	15	禁止含有毒有害氰化物电镀工艺的项目(电镀金、银、铜基合金及予镀铜打底工艺除外)。	否
	16	禁止互联网数据服务中的大数据库项（PUE 值在 1.4 以下的云计算数据中心除外）。	否
	17	禁止不可降解的一次性塑料制品项目（范围包括：含有聚乙烯（PE）、聚丙烯（PP）、聚苯乙烯（PS）、聚氯乙烯（PVC）、乙烯—醋酸乙烯共聚物（EVA）、对苯二甲酸乙二醇酯（PET）等非生物降解高分子材料的一次性膜、袋类、餐饮具类）。	否
	18	禁止年产 7500 吨以下的玻璃纤维项目	否
	19	禁止家具制造项目（利用水性漆工艺除外；使用非溶剂性漆工艺的创意设计家具制造除外）。	否
	20	禁止缫丝、棉、麻、毛纺及一般织造项目。	否
	21	禁止中低端印刷项目（书、报刊印刷除外；本册印制除外；包装装潢及其他印刷中涉及金融、安全、运行保障等领域且使用非溶剂型油墨和非溶剂型涂料的印刷生产环节除外）。	否
	22	禁止黑色金属、有色金属冶炼和压延加工项目。	否

	23	禁止生产、使用产生“三致”物质的项目。	否																						
	24	禁止使用油性喷涂（喷漆）工艺和大量使用挥发性有机溶剂的项目。	否																						
	25	禁止产生和排放氮、磷污染物的项目（符合《江苏省太湖水污染防治条例》要求的除外	否																						
	26	禁止经主管部门会商认定的属于高危行业的项目（金属铸造企业、涉及爆炸性粉尘的企业、涉氨制冷企业）。	否																						
	27	禁止其他经产业主管部门会商认定的排量大、耗能高、产能过剩项目。	否																						
⑤与江苏省“三线一单”生态环境分区管控方案相符性分析																									
2020年6月21日江苏省人民政府发布了《省政府关于印发江苏省“三线一单”生态环境分区管控方案的通知》（苏政发[2020]49号），该方案提出了江苏省重点区域（流域）生态环境分区管控要求，本项目位于重点管控单元，属于太湖流域。本项目与太湖重点流域生态环境分区管控要求的符合性见表1-2。																									
表 1-2 与太湖重点流域生态环境分区管控要求的符合性																									
<table border="1"> <thead> <tr> <th>管控类别</th><th>重点管控要求</th><th>本项目情况</th><th>符合性</th></tr> </thead> <tbody> <tr> <td colspan="4">一、太湖流域</td></tr> <tr> <td rowspan="3">空间布局约束</td><td>在太湖流域一、二、三级保护区，禁止新建、改建、扩建化学制浆造纸、制革、酿造、染料、印染、电镀以及其他排放含磷、氮等污染物的企业和项目，城镇污水集中处理等环境基础设施项目和《江苏省太湖水污染防治条例》第四十六条规定的情形除外。</td><td>本项目位于太湖流域三级保护区内，本项目不属于该区域禁止建设项目，无含磷、氮生产废水排放。</td><td>符合</td></tr> <tr> <td>在太湖流域一级保护区，禁止新建、扩建向水体排放污染物的建设项目，禁止新建、扩建畜禽养殖场，禁止新建、扩建高尔夫球场、水上游乐等开发项目以及设置水上餐饮经营设施。</td><td>本项目不在太湖流域一级保护区内</td><td>符合</td></tr> <tr> <td>在太湖流域二级保护区，禁止新建、扩建化工、医药生产项目，禁止新建、扩建污水集中处理设施排污口以外的排污口。</td><td>本项目不在太湖流域二级保护区内</td><td>符合</td></tr> <tr> <td>污染物排放管控</td><td>城镇污水处理厂、纺织工业、化学工业、造纸工业、钢铁工业、电镀工业和食品工业的污水处理设施执行《太湖地区城镇污水处理厂及重点工业行业主要水污染物排放限值》。</td><td>本项目不属于所列行业</td><td>符合</td></tr> </tbody> </table>				管控类别	重点管控要求	本项目情况	符合性	一、太湖流域				空间布局约束	在太湖流域一、二、三级保护区，禁止新建、改建、扩建化学制浆造纸、制革、酿造、染料、印染、电镀以及其他排放含磷、氮等污染物的企业和项目，城镇污水集中处理等环境基础设施项目和《江苏省太湖水污染防治条例》第四十六条规定的情形除外。	本项目位于太湖流域三级保护区内，本项目不属于该区域禁止建设项目，无含磷、氮生产废水排放。	符合	在太湖流域一级保护区，禁止新建、扩建向水体排放污染物的建设项目，禁止新建、扩建畜禽养殖场，禁止新建、扩建高尔夫球场、水上游乐等开发项目以及设置水上餐饮经营设施。	本项目不在太湖流域一级保护区内	符合	在太湖流域二级保护区，禁止新建、扩建化工、医药生产项目，禁止新建、扩建污水集中处理设施排污口以外的排污口。	本项目不在太湖流域二级保护区内	符合	污染物排放管控	城镇污水处理厂、纺织工业、化学工业、造纸工业、钢铁工业、电镀工业和食品工业的污水处理设施执行《太湖地区城镇污水处理厂及重点工业行业主要水污染物排放限值》。	本项目不属于所列行业	符合
管控类别	重点管控要求	本项目情况	符合性																						
一、太湖流域																									
空间布局约束	在太湖流域一、二、三级保护区，禁止新建、改建、扩建化学制浆造纸、制革、酿造、染料、印染、电镀以及其他排放含磷、氮等污染物的企业和项目，城镇污水集中处理等环境基础设施项目和《江苏省太湖水污染防治条例》第四十六条规定的情形除外。	本项目位于太湖流域三级保护区内，本项目不属于该区域禁止建设项目，无含磷、氮生产废水排放。	符合																						
	在太湖流域一级保护区，禁止新建、扩建向水体排放污染物的建设项目，禁止新建、扩建畜禽养殖场，禁止新建、扩建高尔夫球场、水上游乐等开发项目以及设置水上餐饮经营设施。	本项目不在太湖流域一级保护区内	符合																						
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污染物排放管控	城镇污水处理厂、纺织工业、化学工业、造纸工业、钢铁工业、电镀工业和食品工业的污水处理设施执行《太湖地区城镇污水处理厂及重点工业行业主要水污染物排放限值》。	本项目不属于所列行业	符合																						

环境 风险 防控	1、运输剧毒物质、危险化学品的船舶不得进入太湖。	本项目不涉及	符合
	2、禁止向太湖流域水体排放或者倾倒油类、酸液、碱液、剧毒废渣废液、含放射性废渣、废液、含病原体污水、工业废渣以及其他废弃物。		
	3、加强太湖流域生态环境风险应急管理，着力提高防控太湖蓝藻水华风险预警和应急处置能力。		
资源 利用 效率 要求	1、太湖流域加强水资源配置与调度，优先满足居民生活用水，兼顾生产、生态用水以及航运等需要。	本项目用水量适较少；项目所在园区已开展园区循环化改造	符合
	2、2020 年底前，太湖流域所有省级以上开发区开展园区循环化改造。		
⑥与苏州市“三线一单”生态环境分区管控方案相符性分析			
对照《苏州市“三线一单”生态环境分区管控方案》（苏环办字〔2020〕313 号）文件中“全市共划定环境管控单元 454 个，分为优先保护单元、重点管控单元和一般管控单元，实施分类管理”。本项目所在地属于昆山千灯镇，属于新型工业物流园，为重点管控单元。对照苏州市重点管控单元生态环境分区管控要求，具体分析见表 1-3。			
表 1-3 与苏环办字[2020]313 号符合性分析表			
管 控 类 别	重 点 管 控 单 元 管 控 要 求	相 符 性 分 析	
空 间 布 局 约 束	禁止引进列入《产业结构调整指导目录》《江苏省工业和信息产业结构调整指导目录》《江苏省工业和信息产业结构调整、限制、淘汰目录及能耗限额》淘汰类产业；禁止引进列入《外商投资产业指导目录》禁止类的产业。（2）禁止引进不符合园区产业准入要求的项目。（3）严格执行《江苏省太湖水污染防治条例》的分级保护要求，禁止引进不符合《条例》要求的项目。（4）严格执行《阳澄湖水源水质保护条例》相关管控要求。（5）严格执行《中华人民共和国长江保护法》（6）禁止引进列入上级生态环境负面清单的项目。	（1）本项目为 C2929 塑料零件及其他塑料制品制造，不属于《产业结构调整指导目录》《江苏省工业和信息产业结构调整指导目录》《江苏省工业和信息产业结构调整、限制、淘汰目录及能耗限额》淘汰类产业。（2）本项目符合园区总体规划及控规中的提出的空间布局和产业准入要求，符合园区产业定位。（3）本项目符合《江苏省太湖水污染防治条例》的分级保护要求（4）本项目符合《阳澄湖水源水质保护条例》相关管控要求（5）本项目建成后严格执行《中华人民共和国长江保护法》（6）本项目不属于上级生态环境负面清单的项目	

	污染物排放管控	(1) 园区内企业污染物排放应满足相关国家、地方污染物排放标准要求。(2) 严格实施污染物总量控制制度,根据区域环境质量改善目标,采取有效措施减少主要污染物排放总量,确保区域环境质量持续改善。	(1) 本项目污染物排放能满足相关国家、地方污染物排放标准要求。(2) 本项目污染物排放总量严格实施污染物总量控制制度,采用采取有效措施减少主要污染物排放总量,确保区域环境质量持续改善。
	环境风险防控	涉及环境风险源的企业应严格按照国家标准和规范编制事故应急预案,并与区域环境风险应急预案实现联动,配备应急救援人员和必要的应急救援器材、设备,并定期开展事故应急演练。	本项目投产后会完善事故应急预案和突发环境事件应急预案,并配备足够的应急救援人员和必要的应急救援器材、设备,同时定期开展事故应急演练。
	资源开发效率要求	禁止销售使用燃料为“Ⅲ类”(严格),具体包括:1、煤炭及其制品(包括原煤、散煤、煤矸石、煤泥、煤粉、水煤浆、型煤、焦炭、兰炭等); 2、石油焦、油页岩、原油、重油、渣油、煤焦油; 3、非专用锅炉或未配置高效除尘设施的专用锅炉燃用的生物质成型燃料; 4、国家规定的其它高污染燃料	本项目使用的能源为电能。

综上所述,本项目符合“三线一单”的相关要求。本项目的建设均符合上述管理要求,项目符合国家及地方的产业政策要求。

4、与《江苏省重点行业挥发性有机物污染控制指南》(苏环办〔2014〕128号)相符性。

表 1-4 与苏环办[2014]128 号文的相符性分析

苏环办[2014]128 号文的要求	本项目
所有产生有机废气污染的企业,应优先采用环保型原辅料、生产工艺和装备,对相应生产单元或设施进行密闭,从源头控制非甲烷总烃的产生,减少废气污染物排放。	本项目生产过程中使用 PP、PC、PE 等塑料粒子,生产过程中产生有机废气,项目拟采用 2 套集气装置+二级活性炭吸附装置进行处理,治理后的尾气于 2 根 15m 高排气筒有组织排放。
鼓励对排放的非甲烷总烃进行回收利用,并优先在生产系统内回用。对浓度、性状差异较大的废气应分类收集,并采用适宜的方式进行有效处理,确保非甲烷总烃总去除率满足管要求,其中有机化工、医药化工、橡胶和塑料制品(有溶剂浸胶工艺)。	本项目生产过程中使用 PP、PC、PE 等塑料粒子,生产过程中产生有机废气,项目拟采用 2 套集气装置+二级活性炭吸附装置进行处理,治理后的尾气于 2 根 15m 高排气筒有组织排放,收集效率 95%,去除效率 90%。

5、与《挥发性有机物无组织排放控制标准》（GB37822-2019）相符性分析			
表1-5 与GB37822-2019的相符性分析表			
文件	要求	相符性分析	相符判断结果
VOCs物料储存无组织排放控制要求	VOCs 物料应储存于密闭的容器、包装袋、储罐、储库、料仓中。	本项目原材料为PC、PP、PE等，主要成分均属于聚合物，储存于密闭包装袋中。	相符
VOCs物料转移和输送无组织排放控制要求	(1)液态 VOCs 物料应采用密闭管道输送。采用非管道输送方式转移液态 VOCs 物料时，应采用密闭容器、罐车。 (2)粉状、粒状 VOCs 物料应采用气力输送设备、管状带式输送机、螺旋输送机等密闭输送方式，或者采用密闭的包装袋、容器或罐车进行物料转移。	本项目粉状、粒状 VOCs物料采用密闭的包装袋、容器或罐车进行物料转移。	相符
工艺过程 VOCs无组织排放控制要求(含 VOCs产品的使用过程)	有机聚合物产品用于制品生产的过程，在混合/混炼、塑炼/塑化/熔化、加工成型（挤出、注射、压制、压延、发泡、纺丝等）作业中，应采取密闭设备或在密闭空间内操作，废气应排至 VOCs 废气收集处理系统；无法密闭的，应采取局部气体收集措施，废气应排至 VOCs 废气收集处理系统。	本项目生产过程中使用PP、PC、PE等塑料粒子，生产过程中产生有机废气，采用局部气体收集措施，废气排放至 VOCs废气收集处理系统。	相符
工艺过程 VOCs无组织排放控制要求(其他要求)	企业应建立台账，记录含 VOCs 原辅材料和含 VOCs 产品的名称、使用量、回收量、废弃量，去向以及 VOCs 含量等信息。台账保存期限不少于 3 年。	企业拟建立台账，记录含有机聚合物的名称、使用量、回收量、废弃量，去向以及 VOCs 含量等信息。台账保存期限将不少于 3 年。	相符
	通风生产设备、操作工位、车间厂房等应在符合安全生产、职业卫生相关规定的前提下，根据行业作业规程与标准、工业建筑及洁净厂房通风设计规范等的要求，采用合理的通风量。	通风生产设备、操作工位、车间厂房等均在符合安全生产、职业卫生相关规定的前提下，根据行业作业规程与标准、工业建筑及洁净厂房通风设计规范等的要求，采用合理的通风量。	相符

		载有 VOCs 物料的设备及其管道在开停工（车）、检维修和清洗时，应在退料阶段将残存物料退净，并用密闭容器盛装，退料过程废气应排至 VOCs 废气收集处理系统；清洗及吹扫过程排气应排至 VOCs 废气收集处理系统。	载有 VOCs 物料的设备及其管道工程产生的废气排至 VOCs 废气收集处理系统。	相符
		工艺过程产生的含 VOCs 废料（渣、液）应按照第 5 章、第 6 章的要求进行储存、转移和输送。盛装过 VOCs 物料的废包装容器应加盖密闭。	废渣转移、储存均加盖密闭进行。	相符
		VOCs 废气收集处理系统应与生产工艺设备同步运行。VOCs 废气收集处理系统发生故障或检修时，对应的生产工艺设备应停止运行，待检修完毕后同步投入使用；生产工艺设备不能停止运行或不能及时停止运行时，应设置废气应急处理设施或采取其他替代措施。	VOCs 废气收集处理系统与生产工艺设备同步运行。VOCs 废气收集处理系统发生故障或检修时，对应的生产工艺设备停止运行，待检修完毕后同步投入使用。	相符
		企业应考虑生产工艺、操作方式、废气性质、处理方法等因素，对 VOCs 废气进行分类收集。	本项目根据废气组成、浓度、风量等参数选择适宜的技术，低浓度大风量废气采取活性炭吸附，削减有机废气排放。	相符
		废气收集系统的输送管道应密闭。废气收集系统应在负压下运行。	本项目废气收集系统的输送管道密闭，在负压下运行	相符
		企业应建立台账，记录废气收集系统、VOCs 处理设施的主要运行和维护信息，如运行时间、废气处理量、操作温度、停留时间、吸附剂再生/更换周期和更换量、催化剂更换周期和更换量、吸收液 pH 值等关键运行参数。台账保存期限不少于 3 年。	本项目拟建立台账，记录废气收集处理设施的主要运行和维护信息。台账保存期限不少于 3 年。	相符
	6、结论 综上所述，本项目符合相关产业政策、江苏省生态环境保护法律法规、昆山市 F04 规划编制单元控制性详细规划以及相关生态环境保护规划等相关规划要求。			

二、建设项目工程分析

建设内容

1、项目基本情况

昆山扩庄智能装备有限公司（内资）成立于 2019 年 3 月 4 日，注册地点为昆山市千灯镇鹿场路 468 号 12 号房，企业经营范围为：一般项目：智能基础制造装备制造；智能基础制造装备销售；电子元器件与机电组件设备制造；电子元器件与机电组件设备销售；金属成形机床制造；机械设备销售；模具制造；模具销售；塑料制品制造；塑料制品销售；机械零件、零部件销售；机械零件、零部件加工；计算机软硬件及辅助设备批发；计算机软硬件及辅助设备零售；软件开发；通讯设备销售；通讯设备修理；电子产品销售；玩具制造；玩具销售；金属制品销售；金属链条及其他金属制品销售；金属链条及其他金属制品制造；五金产品制造；五金产品零售；货物进出口；技术进出口（除依法须经批准的项目外，凭营业执照依法自主开展经营活动）。

原企业未进行投资，现因市场发展需要，昆山扩庄智能装备有限公司拟投资 200 万元，于昆山市千灯镇鹿场路 468 号租赁昆山世昊木业有限公司的 12 号房从事生产经营活动，租赁厂房建筑面积 1300m²，项目建成后预计年生产塑料制品（汽车配件、输送配件）120 万件。

根据《中华人民共和国环境保护法》、《中华人民共和国环境影响评价法》、《建设项目环境保护管理条例》等法律、法规的规定，对照《建设项目环境影响评价分类管理名录（2021 年版）》中的有关要求，本项目属于“二十六、橡胶和塑料制品业 29—53 塑料制品业 292”中“其他”项目类别，本项目的环评报告须编制环境影响报告表。因此，昆山扩庄智能装备有限公司委托我公司进行环境影响评价工作。我公司接受委托后，通过现场踏勘、研究有关文件资料，编制了该项目的环评报告表。

2、项目主体工程

建设项目主体工程及产品方案见表 2-1。

序号	工程名称	产品、规格指标	设计能力（/a）	年运行时数
1	生产车间	汽车配件	55 万件	4800h
2		输送配件	65 万件	

3、原辅材料及主要设备

项目主要原辅材料见表 2-2，主要原辅材料理化性质见表 2-3，主要设备见表 2-4。

表 2-2 项目主要生产原辅材料一览表					
名称	形态	单位	数量	包装方式	最大存放量
PP	颗粒状	吨/年	150	袋装	20
PC		吨/年	45	袋装	5
PE		吨/年	55	袋装	5
尼龙		吨/年	20	袋装	2

注：注塑成型过程中会挥发产生少量的有机废气，原辅材料中尼龙会产生少量的氨气，非甲烷总烃挥发比例按照 0.35kg/t 计，氨气挥发比例按照 0.04kg/t 计。

表 2-3 主要原辅材料理化性质	
名称	理化特性
PP	聚丙烯，是丙烯通过加聚反应而成的聚合物。系白色蜡状材料，外观透明而轻。化学式为(C ₃ H ₆) _n ，密度为 0.89~0.91g/cm ³ ，易燃，熔点 165℃，在 155℃左右软化，使用温度范围为-30~140℃。在 80℃以下能耐酸、碱、盐液及多种有机溶剂的腐蚀，能在高温和氧化作用下分解。聚丙烯广泛应用于服装、毛毯等纤维制品、医疗器械、汽车、自行车、零件、输送管道、化工容器等生产，也用于食品、药品包装。
PC	聚碳酸酯，为非结晶性热塑性塑料。化学式为 2,2'-双(4-羟基苯基)丙烷聚碳酸酯，密度 1.18-1.22 g/cm ³ ，熔点 220-230℃，热变形温度 135℃，不溶于水，具有特别好的抗冲击强度、热稳定性、光泽度、抑制细菌特性、阻燃特性以及抗污染性。PC 工程塑料的三大应用领域是玻璃装配业、汽车工业和电子、电器工业，其次还有工业机械零件、光盘、包装、计算机等办公室设备、医疗及保健、薄膜、休闲和防护器材等。
PE	聚乙烯，是乙烯经聚合制得的一种热塑性树脂。为白色蜡状半透明材料，柔而韧，比水轻，无毒，具有优越的介电性能。易燃烧且离火后继续燃烧。透水率低，对有机蒸汽透过率则较大。聚乙烯的透明度随结晶度增加而下降在一定结晶度下，透明度随分子量增大而提高。聚乙烯熔点为 100-130℃其耐低温性能优良。在-60℃下仍可保持良好的力学性能，但使用温度在 80~110℃。化学稳定性好，能耐大多数酸碱的侵蚀（不耐具有氧化性质的酸）。常温下不溶于一般溶剂，吸水性小，电绝缘性优良。
尼龙	PA 塑料、聚酰胺，结晶料，熔点较高，熔融温度范围窄，热稳定性差，料温超过 300 度、滞留时间超过 30 分钟即分解。较易吸湿，需干燥，含水量不得超过 0.3%。PA 具有良好的综合性能，包括力学性能、耐热性、耐磨损性、耐化学药品性和自润滑性，且摩擦系数低，有一定的阻燃性，易于加工，适于用玻璃纤维和其它填料填充增强改性，提高性能和扩大应用范围。

表 2-4 项目主要生产设备一览表					
序号	主要生产单元	主要生产工艺/工序	设备名称	型号	数量（台/套）
1	注塑生产线	注塑成型	注塑机	国盛	19
2			拌料机	乔峰	4
3			粉碎机	峰豪	5
7		辅助	空压机	屹邦	2
8		辅助	冷却塔	屹邦	2

4、公辅工程

（1）给排水

企业共有员工 15 人，建设项目用水量为 650t/a，其中员工生活用水 450t/a、冷却用水 200t/a，均来自当地自来水管网。

建设项目所在厂区排水实行“雨污分流”。建设项目生活污水 360t/a 进入昆山市千灯琨澄水质净化有限公司处理，达“苏州特别排放限值标准”标准及《城镇污水处理厂污染物排放标准》（GB18918-2002）的表 1 一级 A 标准后排入吴淞江。

项目生产过程中需要进行间接水冷，冷却水循环使用，不外排，本项目冷却水循环使用量为 0.83t/h，预计补充水量 200t/a。

水平衡图：

```

graph LR
    FreshWater[新鲜水 650] --> LifeWater[生活用水 450]
    FreshWater --> CoolingWater[冷却用水 200]
    LifeWater -- 损耗 90 --> Loss1[ ]
    LifeWater -- 360 --> WWTW[昆山市千灯琨澄水质净化有限公司]
    WWTW -- 360 --> WuSongJiang[吴淞江]
    CoolingWater -- 损耗 200 --> Loss2[ ]
    CoolingWater -- 循环使用 0.83t/h --> CoolingWater
  
```

图 2-1 项目水平衡图（t/a）

（2）供电

建设项目用电量为 50 万 kWh/年，由当地电网供电。

（3）绿化

建设项目依托租赁方周边现有绿化。

（4）贮运

建设项目原材料及产品进出厂均使用汽车运输，主要原辅材料及产品均储存于原料仓库区及成品仓储区。

建设项目公用及辅助工程见表 2-5。

表 2-5 公用及辅助工程一览表

类别	建设名称			设计能力	备注
主体工程	生产加工车间			租赁厂房建筑面积 1240m ²	租赁昆山市世昊木业有限公司的 12 号房
辅助工程	办公区			建筑面积 60m ² ，用于办公	
贮运工程	原材料、产品（一般性物品，非危险化学品）			依托生产车间	汽车运输
公用工程	给水	自来水		650t/a	由市政自来水管网直接供给
	排水	生活污水		360t/a	由市政污水管道排入昆山市千灯琨澄水质净化有限公司
	供电			50 万 kWh/a	市政电网
	绿化			—	依托厂房现有绿化
环保工程	废气	有组织	注塑废气（非甲烷总烃、氨气）	经 2 套集气罩+二级活性炭吸附装置处理后通过 2 根 15m 排气筒排出（DA001、DA002）	有组织达标排放
		无组织	注塑废气未捕集（非甲烷总烃、氨气）	加强车间通风	无组织达标排放
			粉碎粉尘（颗粒物）		
	废水	生活污水		进昆山市千灯琨澄水质净化有限公司处理	达标排放
	噪声	噪声		厂房隔声、消声、减振	达标排放
	固废	废包装材料		5m ² 固废暂存处（车间东侧中部）	收集后外售综合利用
		粉尘			
		废活性炭		5m ² 危废暂存处（车间东北侧）	委托有资质单位回收处理
		生活垃圾		垃圾收集桶若干	环卫部门统一收集处理

5、环保投资

建设项目环保投资 10 万元，占总投资的 5%，具体环保投资情况见表 2-6。

	表 2-6 项目环保投资一览表				
	序号	污染源	环保设施名称	环保投资(万元)	处理效果
	1	废气	排风扇、废气处理设施等	8	达标排放
	2	废水	依托厂区现有的污水管网、阀门等	—	达标排放
	3	噪声	隔声、消声、减振	1	达标排放
	4	固废	固废分类收集	1	零排放
	合计		—	10	—
6、职工人数及工作制度					
本项目预计员工人数为 15 人，项目年生产 300 天，两班制工作，每班工作 8 小时，年运营时间 4800 小时。厂区不提供住宿，食物外包。					
7、周边环境概况及项目平面布置					
项目周边环境关系见附图 2，项目地址为昆山市千灯镇鹿场路 468 号 12 号房，位于昆山市世昊木业有限公司 12 号房内中部。本项目厂区东侧为闲置厂房，南侧为昆山斯坦福家具有限公司；西侧为松川南路，北侧为昆山华时代新材料有限公司。项目周边 500m 范围内无环境敏感点。					
本项目租赁昆山市世昊木业有限公司的闲置厂房从事生产经营活动，租赁面积 1300m ² ，主要包括生产车间、仓库和办公室，具体情况详见厂区平面布置图（附图 3）。					
工艺流程和产污环节	1、工艺流程简述（图示）：				
图 2-2.1 塑料制品（汽车配件、输送配件）工艺流程及产污环节图					
工艺流程说明：					
投料、搅拌：根据产品性质选择不同原料，将塑料粒子拆包后投入注塑机料筒内进行搅拌均匀。塑料粒子均为颗粒状，此过程相对密闭不起尘。投料、搅拌过程产生少量的废包装材料。					
注塑成型、冷却：将搅拌配色过得塑料粒子直接投入注塑机料斗，通过螺杆的转动将塑料原料输送至机筒的前端，之后加热器将对筒内的原料进行加热，加热采用电加热，加					

	热温度为 140~260℃，使塑料原料成为熔融状态；计量后的熔融塑料滞留于机筒前端，螺杆不断向前将塑料原料射入模腔，最后经冷却水冷却循环使用。加工过程中会产生少量边角料及塑料挥发性气体（主要成分为非甲烷总烃，氨气等废气）。 成品：加工完成后通过人工和检测仪器进行检验出成品和不良品。 粉碎：注塑过程中产生的边角料及检验过程中产生的不良品经粉碎机粉碎之后回用于生产，粉碎机运行过程中均处于密闭状态，仅在进出料过程有少量粉尘溢出。 包装：待全部检验完毕通过人工进行包装后出货。 2、产排污情况 项目产排污情况见表 2-7。 <table><tr><th colspan="4">表 2-7 项目主要污染工序一览表</th></tr><tr><th>污染物类别</th><th>来源</th><th>编号</th><th>污染物种类</th></tr><tr><td>生活污水</td><td>员工生活</td><td>W1</td><td>COD、SS、NH₃-N、TP</td></tr><tr><td rowspan="2">废气</td><td>注塑成型</td><td>G1</td><td>非甲烷总烃、氨气</td></tr><tr><td>粉碎粉尘</td><td>G2</td><td>颗粒物</td></tr><tr><td>噪声</td><td>注塑机、粉碎机、空压机等</td><td>N</td><td>噪声</td></tr><tr><td rowspan="4">固体废物</td><td>原料拆包</td><td>S1</td><td>废包装材料</td></tr><tr><td>废气处理</td><td>S2</td><td>废活性炭</td></tr><tr><td>废气处理</td><td>S3</td><td>粉碎粉尘</td></tr><tr><td>职工生活</td><td>S4</td><td>生活垃圾</td></tr></table>	表 2-7 项目主要污染工序一览表				污染物类别	来源	编号	污染物种类	生活污水	员工生活	W1	COD、SS、NH ₃ -N、TP	废气	注塑成型	G1	非甲烷总烃、氨气	粉碎粉尘	G2	颗粒物	噪声	注塑机、粉碎机、空压机等	N	噪声	固体废物	原料拆包	S1	废包装材料	废气处理	S2	废活性炭	废气处理	S3	粉碎粉尘	职工生活	S4	生活垃圾
表 2-7 项目主要污染工序一览表																																					
污染物类别	来源	编号	污染物种类																																		
生活污水	员工生活	W1	COD、SS、NH ₃ -N、TP																																		
废气	注塑成型	G1	非甲烷总烃、氨气																																		
	粉碎粉尘	G2	颗粒物																																		
噪声	注塑机、粉碎机、空压机等	N	噪声																																		
固体废物	原料拆包	S1	废包装材料																																		
	废气处理	S2	废活性炭																																		
	废气处理	S3	粉碎粉尘																																		
	职工生活	S4	生活垃圾																																		
与项目有关的原有环境问题	本项目为新建项目，租用昆山世昊木业有限公司的 12 号房进行生产，无与本项目有关的原有污染情况及主要环境问题。 本项目所使用的厂房内已铺设好雨水管、污水管，并已实现雨、污分流。																																				

三、区域环境质量现状、环境保护目标及评价标准

区域 环境 质量 现状	1、大气环境质量状况					
	本次评价选取 2021 年作为评价基准年，根据《2021 年度昆山市环境状况公报》，项目所在区域昆山市各评价因子数据见表 3-1。					
	表 3-1 大气环境现状情况一览表					
	评价因子	年评价标准	现状浓度 (mg/m³)	标准值 (mg/m³)	超标 倍数	达标 情况
	SO ₂	年均值	8	60	/	达标
	NO ₂	年均值	36	40	/	达标
	PM ₁₀	年均值	52	70	/	达标
	PM _{2.5}	年均值	27	35	/	达标
	CO	24 小时平均第 95 百分位数	1100	4000	/	达标
	O ₃	日最大 8 小时滑动平均值第 90 百分位数	173	160	0.08	超标
由表 3-1 可知，2021 年度昆山市环境空气中二氧化硫、二氧化氮、PM10、CO、PM2.5 年均值浓度达标，臭氧日最大 8 小时滑动平均值第 90 百分位数浓度超过《环境空气质量标准》（GB3095-2012）二级标准，超标倍数为 0.08 倍，因此判定为非达标区。						
根据《苏州市空气质量改善达标（2019-2024）》，苏州市以到 2020 年空气质量优良天数比率达到 75%为近期目标，以到 2024 年环境空气质量实现全面达标为远期目标，通过调整能源结构，控制煤炭消费总量；调整产业结构，减少污染物排放；推进工业领域全行业、全要素达标排放；加强交通行业大气污染防治；严格控制扬尘污染；加强服务业和生活污染防治；推进农业污染防治；加强重污染天气应对措施，提升大气污染防治能力，届时昆山市的环境空气质量将会得到改善。						
2、水环境质量状况						
根据《2021 年度昆山市环境状况公报》，区域水环境质量情况如下。						
(1) 集中式饮用水源地水质						
2021 年，昆山市集中式饮用水水源地水质均能达到《地表水环境质量标准》（GB3838-2002）III类水标准，达标率为 100%，水源地水质保持稳定。						
(2) 主要河流水质						
昆山市 7 条主要河流的水质状况在优~轻度污染之间，庙泾河、七浦塘、张家港 3 条河流水质为优，急水港桥、吴淞江 2 条河流为良好，杨林塘、娄江河 2 条河流为轻度污染。与上年相比，杨林塘、娄江河、急水港 3 条河流水质有不同程度下降，其余 4						

条河流水质保持稳定。

（3）主要湖泊水质

昆山市 3 个主要湖泊中，阳澄东湖（昆山境内）水质符合Ⅳ类水标准（总氮Ⅳ类），综合营养状态指数为 52.3，轻度富营养；傀儡湖水质符合Ⅲ类水标准（总氮Ⅳ类），综合营养状态指数为 49.5，中营养；淀山湖（昆山境内）水质符合Ⅴ类水标准（总氮Ⅴ类）综合营养状态指数为 56.1，轻度富营养。

（4）国省考断面水质

昆山市境内 10 个国省考断面（吴淞江赵屯、急水港急水港桥（十四五）、千灯浦口、朱厓港朱厓港口、张家港巴城湖口、娄江正仪铁路桥、浏河振东渡口、杨林塘青阳北路桥、淀山湖淀山湖中、道褐浦新开泾桥）水质达标率为 100%，优Ⅲ比例为 90%（其中河流断面优Ⅲ比例保持 100%），均达到年度目标要求。

本项目区域内吴淞江的水质为良好。

3、声环境质量状况

项目区域声环境现状委托江苏坤实检测技术有限公司对其进行现场监测，监测时间为 2021 年 11 月 6 日。具体监测结果见表 3-2。

表 3-2 声环境现状监测结果一览表

监测日期	监测位置	Leq [dB (A)] (昼间)	标准
2021.11.6	N1 东边界	56	GB3096-2008《声环境质量标准》3类区 昼间≤65dB (A)
	N2 南边界	54	
	N3 西边界	54	
	N4 北边界	59	

从上表可看出，区域声环境质量满足《声环境质量标准》（GB3096-2008）3类区的限值要求。由此说明，项目区声环境质量良好。

4、生态环境质量

根据《2021 年度昆山市环境状况公报》，昆山市最近年度（2021 年）生态环境质量指数为 61.1，级别为“良”。生态系统处于较稳定状态，植被覆盖度较好，生物多样性丰富，适合人类生活。

5、地下水环境质量现状

本项目不存在地下水环境污染途径，根据《建设项目环境影响报告表编制技术指南（污染影响类）（试行）》要求，项目无需开展地下水环境质量现状调查。

6、土壤环境质量现状

	根据《建设项目环境影响报告表编制技术指南（污染影响类）（试行）》要求，项目无需开展土壤环境质量现状调查。 7、电磁辐射 本项目不涉及电磁辐射影响，不需开展电磁辐射现状监测与评价。
环境保护目标	1、大气环境保护目标 厂界外 500m 范围内无大气环境保护目标。 2、声环境保护目标 厂界外 50m 范围内没有声环境保护目标。 3、地下水环境保护目标 厂界外 500m 范围内无地下水集中式饮用水水源和热水、矿泉水、温泉等特殊地下水资源。 4、生态环境保护目标 本项目不新增用地，不涉及生态环境保护目标。
污染物排放控制标准	1、废气排放标准 本项目粉碎粉尘废气排放执行江苏省《大气污染物综合排放标准》（DB32/4041-2021）表 3 标准，注塑成型过程产生的非甲烷总烃废气排放执行《合成树脂工业污染物排放标准》（GB31572-2015）表 5、表 9 标准，注塑成型过程产生的氨气废气有组织排放执行《合成树脂工业污染物排放标准》（GB31572-2015）表 5 标准，无组织排放执行《恶臭污染物排放标准》（GB14554-93）表 1 恶臭污染物厂界“二级新扩改建”标准，厂区内标准执行江苏省《大气污染物综合排放标准》（DB32/4041-2021）表 2 标准。具体见表 3-4~3-5。

表 3-4 大气污染物排放限值标准							
污染源	污染物	最高允许排放浓度 (mg/m ³)	污染物排放监控位置	最高允许排放速率 (kg/h)	无组织排放监控浓度限值		执行标准
					浓度 (mg/m ³)	监控点	
注塑成型 (DA001、DA002有组织)	非甲烷总烃	60	车间或生产设施排气筒	—	—	—	执行《合成树脂工业污染物排放标准》 (GB31572-2015)表 5 标准
	氨气	20		—	—	—	
注塑成型未捕集 (无组织)	非甲烷总烃	—	—	—	4.0	厂界	执行《合成树脂工业污染物排放标准》 (GB31572-2015)表 9 标准
	氨气	—	—	—	1.5	厂界	执行《恶臭污染物排放标准》 (GB14554-93)表 1 恶臭污染物厂界“二级新扩改建”标准
	臭气浓度	—	—	—	20(无量纲)	边界外浓度最高点	
粉碎粉尘 (无组织)	颗粒物	—	—	—	0.5	周界外浓度最高点	执行江苏省《大气污染物综合排放标准》 (DB32/4041-2021)表 3 标准

表 3-5 厂区内非甲烷总烃无组织排放限值（单位 mg/m ³ ）				
污染物项目	排放限值	限值含义	无组织排放监控位置	执行标准
非甲烷总烃	6	监控点处 1h 平均浓度值	在厂房外设置监控点	执行江苏省《大气污染物综合排放标准》 (DB32/4041-2021)表 2 标准
	20	监控点处任意一次浓度值		

2、废水排放标准

本项目无生产废水外排，项目废水主要为职工生活产生的生活污水，生活污水排入市政管网纳管执行昆山市千灯琨澄水质净化有限公司接管标准；污水经处理后从昆山市千灯琨澄水质净化有限公司排入外环境时执行“苏州特别排放限值标准”及《城镇污水处理厂污染物排放标准》（GB18918—2002）一级 A 标准，具体值见下表 3-6。

表 3-6 污水排放标准限值表					
排污口名称	执行标准	取值表号及级别	污染物指标	单位	标准限值
项目排放口	昆山市千灯琨澄水质净化有限公司接管标准	—	pH	无量纲	6.5-9.5
			COD	mg/L	350
			SS		190
			氨氮		48
			TP		6
			TN		55
污水处理厂排口	《城镇污水处理厂污染物排放标准》(GB18918-2002)	一级 A 标准	pH	—	6-9
			粪大肠杆菌	个/L	50
			SS	mg/L	10
	“苏州特别排放限值标准”	—	COD	mg/L	30
			氨氮		1.5(3)*
			总氮		10
			总磷		0.3

注：根据苏州市《关于高质量推进城乡生活污水治理三年行动计划的实施意见》（苏委办发[2018]77 号要求执行苏州特别排放限值）。

（1）*括号外数值为水温>12℃时的控制指标，括号内数值为水温≤12℃时的控制指标。

（2）全市生活污水处理厂 2021 年 1 月 1 日起按照苏州特别排放标准考核。根据《城镇污水处理厂污染物排放标准》（GB18918-2002）第 4.1.4.2 款规定取样频率为至少每 2h 一次，取 24h 混合样。

3、噪声排放标准

营运期噪声执行《工业企业厂界环境噪声排放标准》（GB12348-2008）3 类标准，见表 3-7。

表 3-7 《工业企业厂界环境噪声排放标准》（GB12348-2008）3 类标准 Leq dB (A)

类别	昼间	夜间
3	65	55

4、固体废物

项目产生的一般工业固体废物贮存执行《一般工业固体废物贮存和填埋污染控制标准》（GB18599-2020）要求。

危险废物贮存按照《危险废物贮存污染控制标准》（GB18597-2001）及修改单要求、《危险废物收集储存运输技术规范》（HJ2025-2012）要求及《省生态环境厅关于进一步加强危险废物污染防治工作的实施意见》（苏环办【2019】327 号）要求进行危险废物

	本项目新增挥发性有机物 0.01375 吨/年，颗粒物 0.00675 吨/年。 项目生活污水水污染物排放总量已包括在昆山市千灯琨澄水质净化有限公司申请的污染物总量中，无需另行申报，可在昆山市千灯琨澄水质净化有限公司申请的污染物总量内平衡。 固废均得到了有效处置。
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四、主要环境影响和保护措施

施工期环境保护措施	本项目租赁昆山市世昊木业有限公司 12 号房从事生产经营活动，租赁面积 1300m ² ，施工期无土建作业，仅进行设备安装调试等，因此施工期对外环境基本无影响。																				
运营期环境影响和保护措施	1、废气																				
	（1）产污分析																				
	①产污环节和污染物种类																				
	本项目废气主要为注塑成型废气，粉碎废气。																				
	②污染物产生量及排放方式分析																				
	A、注塑成型																				
	<table><tr><th>序号</th><th>类别</th><th>热分解温度（℃）</th><th>本项目加工温度（℃）</th></tr><tr><td>1</td><td>PP</td><td>>350</td><td>160-180</td></tr><tr><td>2</td><td>PC</td><td>>340</td><td>260</td></tr><tr><td>3</td><td>PE</td><td>>320</td><td>140</td></tr><tr><td>4</td><td>尼龙</td><td>>300</td><td>210</td></tr></table>	序号	类别	热分解温度（℃）	本项目加工温度（℃）	1	PP	>350	160-180	2	PC	>340	260	3	PE	>320	140	4	尼龙	>300	210
序号	类别	热分解温度（℃）	本项目加工温度（℃）																		
1	PP	>350	160-180																		
2	PC	>340	260																		
3	PE	>320	140																		
4	尼龙	>300	210																		
	本项目注塑成型在特定温度环境下进行。熔融温度一般略高于熔化温度，但低于分解或裂解温度。因此，塑料的造粒过程为物理熔化过程，无裂解废气产生。由于塑料内含有少量单体，在分子间的剪切挤压下发生断链、分解、降解过程中产生的游离单体废气。本项目塑料粒子成型温度低于分解问题，塑料不易分解。但是，在固态废塑料挤出加热转化为流态塑料的过程中，会有少量异味气体挥发产生，即挥发性有机废气，由于这部分废气的成分及含量不固定，亦无相对应的具体排放标准，而其共同的特性是作为挥发性有机物质，以碳氢化合物成分为主，因此以非甲烷总烃计。																				
	根据《空气污染物排放和控制手册》（美国国家环保局）中推荐的公式和本项目建成后物料的实际使用量计算非甲烷总烃排放量，该手册认为在无控制措施时，非甲烷总烃的排放系数为 0.35kg/t 树脂原料。																				
	本项目使用到 PE（聚乙烯）、PP（聚丙烯）、PC（聚碳酸酯）、尼龙（PA、聚酰胺树脂），本项目注塑工序在加热过程中加热温度虽未达热分解温度，但熔融状态下，PP 塑料粒、PE、PC、尼龙等均会挥发出少量非甲烷总烃废气，尼龙还会挥发出少量的氨气。																				
	根据文献《聚酰胺工程塑料，嵌段共聚酰胺 611 的合成、表征及性能的研究》、《新型半芳香聚酰胺的合成与表征》等，PA66 塑料注塑工序废气主要为非甲烷总烃与少量的氨气，其中非甲烷总烃废气占比 90%，氨气占比 10%，由此计算，氨的产污系数以 0.04kg/t																				

计。根据上述系数，本项目注塑成型过程中废气产生量见表 4-1。

表 4-2 注塑成型工段污染物产生量挥发系数

工段	塑料粒子类型	年消耗量(t)	污染物名称	产污系数(kg/t 产品)	污染物产生量(t)
车间北侧注塑成型	PP	105	非甲烷总烃	0.35	0.03675
	PC	30	非甲烷总烃	0.35	0.0105
	PE	40	非甲烷总烃	0.35	0.014
	尼龙	15	非甲烷总烃	0.35	0.00525
			氨气	0.04	微量
车间南侧注塑成型	PP	45	非甲烷总烃	0.35	0.01575
	PC	15	非甲烷总烃	0.35	0.00525
	PE	15	非甲烷总烃	0.35	0.00525
	尼龙	5	非甲烷总烃	0.35	0.00175
			氨气	0.04	微量

恶臭主要产生于原料堆放、塑料熔融挤出过程。本项目使用的塑料粒会挥发出少量恶臭气体，如氨气等，在实际生产中恶臭气体产生量较小，类比同类项目，车间的臭气浓度均低于 10mg/m³，对周围环境影响不大。

根据苏环办[2014]128 号关于印发《江苏省重点行业挥发性有机物污染控制指南》，本项目有机废气应收集处理，收集及处理效率原则上不低于 90%。企业拟对建设项目产生的有机废气收集后经 2 套+二级活性炭吸附装置吸附后经过 2 根 15m 高排气筒（DA001、DA002）有组织排放。

B、粉碎粉尘

塑料边角料、残次品进行破碎时，材料从大块转变为碎片，高速剪切和相互频繁摩擦下会产生少量粉尘，从破碎机投料口和出料口逸散出来。此类粉尘比重较大，大部分易于沉降下来，积聚在破碎机周围，只有少量会随气流向四周飘散。参考《空气污染物排放系数和控制手册》，一般塑料加工过程中粉尘的产生系数为 2.5~5kg/t 原料，本评价按 5kg/t 原料计算。

(2) 治理措施及可行性简要分析

A、注塑成型

针对以上废气，拟在注塑机等上方（出料口）设集气装置，经集气罩收集后通入废气处理系统，本项目注塑机分别设在两个车间，因此废气经过2套滤装置+二级活性炭吸附装置收集处理后经2根15m排气筒（DA001、DA002）达标排放，风机风量均为10000m³/h，排气管内径0.5m。

①厂房车间北侧，按有机废气的收集效率95%计算，非甲烷总烃废气有组织产生量为0.06318t/a，产生速率为0.01316kg/h，产生浓度为1.3163mg/m³。按去除效率90%计算，本项目非甲烷总烃废气有组织排放量为0.006318t/a，排放速率0.00132kg/h，排放浓度为0.1316mg/m³。

②厂房车间南侧，按有机废气的收集效率95%计算，非甲烷总烃废气有组织产生量为0.0266t/a，产生速率为0.00554kg/h，产生浓度为0.5542mg/m³。按去除效率90%计算，本项目非甲烷总烃废气有组织排放量为0.00266t/a，排放速率0.00055kg/h，排放浓度为0.0554mg/m³。

由于两条注塑生产线在一个车间内，所以整个注塑成型工序未捕集非甲烷总烃废气总量约为0.004725t/a，排放速率0.000984kg/h。

经过车间加装通风设施及时换风，无组织达标排放。本项目氨气废气产生、排放量微量，故不对其进行定量分析，只进行定性分析。

B、粉碎粉尘

本项目塑料边角料、残次品的产生量约为原材料使用量的0.5%，即1.35t/a，则破碎粉尘产生量为0.00675t/a，排放速率为0.00141kg/h，粉尘产生量较少，通过加强车间通风，无组织达标排放，对周围环境影响较小。

（3）废气排放源强分析

本项目有组织、无组织废气产生及排放情况详见表4-1、4-2。

表4-1 本项目有组织废气产生及排放情况一览表

来源	污染物名称	废气量 m ³ /h	产生情况			处理措施	处理效率	排放状况			排放方式
			产生量 t/a	浓度 mg/m ³	产生速率 kg/h			排放量 t/a	浓度 mg/m ³	排放速率 kg/h	
DA001	非甲烷总烃	10000	0.06318	1.3163	0.01316	二级活性炭吸附装置	90%	0.006318	0.1316	0.00132	有组织
	氨气		/	/	微量		0	/	/	微量	

DA002	非甲烷总烃	10000	0.0266	0.5542	0.00554	二级活性炭吸附装置	90%	0.00266	0.0554	0.00055	有组织
	氨气		/	/	微量		0	/	/	微量	

表 4-2 项目无组织废气排放源强

污染源位置	污染物名称	产生量(t/a)	排放量(t/a)	排放速率(kg/h)	面源面积(m²)	面源有效排放高度
生产车间	非甲烷总烃	0.004725	0.004725	0.000984	1300	8
	氨气	微量	微量	/		
	颗粒物	0.00675	0.00675	0.00141		

(4) 活性炭吸附装置可行性分析:

A 工作原理

活性炭吸附的实质是利用活性炭吸附的特性把低浓度大风量废气中的有机溶剂吸附到活性炭中并浓缩,经活性炭吸附净化后的气体直接排空,其实质是一个吸附浓缩的过程,是一个物理过程。活性炭颗粒吸附适于处理浓度低、间歇排放、无回收价值的有机废气。活性炭颗粒吸附法不产生废水,能适应废气浓度的变化,而且可以吸附卤代经类物质。现有相关研究表明,活性炭对挥发性有机废气等的吸附均有一定的去除效果。吸附法是处理 VOC 最常用的方法之一。经实际调查、类比同类企业同类废气采用同类处理工艺,采取活性炭吸附去除有机可吸附废气的效率可达 90%以上。

本项目使用颗粒活性炭,本项目共设置两套活性炭吸附装置,活性炭吸附法治理效率取值为 90%,为保证有机废气吸附净化效率,企业在运行过程中将定期更换吸附饱和的活性炭,确保各废气处理装置一直处于正常稳定的工作状态。本项目 2 套活性炭吸附装置参数一致,具体见表 4-3。

表 4-3 活性炭吸附装置设计参数表

参数名称	主要参数
填充物	颗粒活性炭
比表面积	≥1000m³/g
吸附阻力	700
结构形式	抽屉式
停留时间	0.2~2s
活性炭碘值	≥800mg/g
总填充量	0.5t
填充层	2 层
活性炭密度	0.5g/cm³

更换周期		每年更换一次	
活性炭底座		—	
排气筒参数	高度	15	
	直径	0.5m	
	风量	10000m ³ /h	

表 4-4 项目废气排放环节、污染物及污染物处理设施信息表								
产污环节	污染物类型	排放形式	治理措施					排放源编号
			治理工艺	处理能力	是否为可行性技术	收集效率	处理效率	
注塑工序	非甲烷总烃、氨气	有组织	二级活性炭吸附装置	10000 m ³ /h	是	90%	90%	DA001、DA002
注塑、粉碎等等未捕集	非甲烷总烃、氨气、颗粒物	无组织	加强车间通风	—	是	—	—	生产车间

B 技术可行性分析

根据《吸附法工业有机废气治理工程技术规范》（HJ2026-2013）：采用颗粒状活性炭吸附时，气体流速宜低于 0.6m/s，采用纤维状活性炭时，气体流速宜低于 0.15m/s，采用蜂窝状活性炭时，气体流速宜低于 1.20m/s。

本项目废气处理方式属于针对烘干产生的有机废气采用吸附法，活性炭吸附技术广泛应用于有机废气处理中，是一种技术成熟、高效和经济的废气处理方式，本项目注塑工序中产生的有机废气经活性炭吸附处理后通过 15m 排气筒排放，从废气处理方式上是可行、可靠的。

活性炭的多孔结构赋予其优异的吸附性能，本项目车间北侧注塑工序有机废气产生量为 0.0665t/a。经一套废气处理设施收集处理后达标排放，有机废气收集效率为 95%、处理效率为 90%。则 DA001 处有机废气有组织产生量为 0.06318t/a，有机废气有组织排放量为 0.006318t/a，有机废气的去除量为 0.05686t/a；车间南侧侧注塑工序有机废气产生量为 0.028t/a。经一套废气处理设施收集处理后达标排放，有机废气收集效率为 95%、处理效率为 90%。则 DA001 处有机废气有组织产生量为 0.0266t/a，有机废气有组织排放量为 0.00266t/a，有机废气的去除量为 0.0239t/a。

根据《省生态环境厅关于将排污单位活性炭使用更换纳入排污许可管理的通知》，活性炭更换周期 $T=m \times s \div (c \times 10^{-6} \times Q \times t)$ 。

上式中：

	T—更换周期，天； m—活性炭的用量，kg，取值 500kg； s—动态吸附量，%；（一般取值 15%） c—活性炭削减的 VOCs 浓度，mg/m³，DA001 取 1.1846，DA002 取 0.4979； Q—风量，单位 m³/h，取值 10000； t—运行时间，单位 h/d，取值 16。 则车间北侧：T=500×15%÷（1.1846×10⁻⁶×10000×16）=395.7，因此活性炭更换周期为 1 年；车间南侧：T=500×15%÷（0.4979×10⁻⁶×10000×16）=941.45，因此活性炭更换周期为 1 年。 则实际每年所需活性炭量总计为 1t，产生的废活性炭的量约为 1.08t/a（其中包含活性炭和吸附的废气）。 为保证项目有机废气有效的收集，建设单位应确保整个废气产生区域密闭，在工序开始前，预先开启排风装置，使整个区域处于负压状态，工作结束一段时间后，再行关闭排风装置，保证该区域内的废气有效收集处理。 C.达标分析 本项目有机废气经活性炭吸附装置处理后有机废气排放浓度满足《合成树脂工业污染物排放标准》（GB31572-2015）中的有组织排放相关要求，项目废气达标排放。 综上所述，本项目营运期经采取有效措施后，污染物均能达标排放，对周围环境影响较小。 （5）污染源参数调查 项目污染源参数调查情况见表 4-5、4-6。
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表 4-5 主要废气污染源参数一览表（点源）									
污染源名称	排气筒底部中心坐标		排气筒底部海拔高度(m)	排气筒参数				污染物名称	排放速率（kg/h）
	X	Y		高度(m)	内径(m)	温度(℃)	流量(m³/h)		
点源（DA001）	东经121.056198	北纬31.231964	2	15.0	0.5	30.0	10000	非甲烷总烃	0.00132
								氨气	/
点源（DA0-02）	东经121.055991	北纬31.231737	2	15.0	0.5	30.0	10000	非甲烷总烃	0.00055
								氨气	/

表 4-6 主要废气污染源参数一览表(矩形面源)						
污染源名称	海拔高度/m	矩形面源			污染物	排放速率（kg/h）
		长度（m）	宽度（m）	有效高度（m）		
矩形面源	2	44	22	8	非甲烷总烃	0.000984
					氨气	/
					颗粒物	0.00141

（6）正常情况下废气排放情况分析

由上述可知，本项目正常情况排放的大气污染物对大气环境影响可接受，项目大气污染物排放方案可行。

本项目注塑成型过程产生的有组织非甲烷总烃、氨气排放浓度满足《合成树脂工业污染物排放标准》（GB31572-2015）表 5 标准；未能收集到的无组织非甲烷总烃排放达《合成树脂工业污染物排放标准》（GB31572-2015）表 9 标准，无组织氨气排放达《恶臭污染物排放标准》（GB14554-93）中表 1 标准，粉碎粉尘排放达《江苏省大气污染物综合排放标准》(DB32/4041-2021)表 3 标准。

（7）非正常情况下废气排放情况分析

本项目的非正常工况主要是污染物排放控制措施达不到应有效率，即活性炭失效，造成排气筒废气中废气污染物未经净化直接排放，其排放情况如表 4-7 所示。

表 4-7 非正常工况排气筒排放情况								
污染源	非正常排放情况	污染物	非正常排放浓度 mg/m³	非正常排放速率 kg/h	单次持续时间 min	年发生频次/ 次	年排放量 t/a	应对措施
DA001	废气处理设施故障	非甲烷总烃	0.6582	0.00658	30	1	0.00329	定期进行设备维护，当废气处理装置出现故障不能短时间恢复时停止生产
		氨气	/	/			/	
DA002	废气处理设施故障	非甲烷总烃	0.2771	0.00277	30	1	0.00139	
		氨气	/	/			/	

由上表可知，非正常工况下，DA001、DA002 排气筒非甲烷总烃、氨气排放浓度都达标。为防止生产废气非正常工况排放，企业必须加强废气处理设施的管理，定期检修，确保废气处理设施正常运行，在废气处理设备停止运行或出现故障时，产生废气的各工序也必须相应停止生产。为杜绝废气非正常排放，应采取以下措施确保废气达标排放：

①安排专人负责环保设备的日常维护和管理，每个固定时间检查、汇报情况，及时发现废气处理设备的隐患，确保废气处理系统正常运行；

②定期更换活性炭；

③建立健全的环保管理机构，对环保管理人员和技术人员进行岗位培训，委托具有专业资质的环境检测单位对项目排放的各类污染物进行定期检测；

④应定期维护、检修废气净化装置，以保持废气处理装置的净化能力和净化容量。

（8）大气监测计划

对照环保部印发的《重点排污单位名录管理规定（试行）》（环办监测[2017]86 号）和《2020 年苏州市重点排污单位名单》，本项目建设单位不属于重点排污单位。依据《排污单位自行监测技术指南总则》（HJ 819-2017），全厂废气的日常监测计划建议见表 4-8。

表 4-8 本项目日常监测计划建议			
监测点位	监测指标	监测频次	执行排放标准
厂界上风向、下风向	非甲烷总烃	一次/年	《合成树脂工业污染物排放标准》（GB31572-2015）表 9 标准
	氨气		执行《恶臭污染物排放标准》（GB14554-93）中表 1 标准
	颗粒物		执行《江苏省大气污染物综合排放标准》（DB32/4041-2021）表 3 标准
排气筒进出口（DA001、DA002）	非甲烷总烃、氨气		执行《合成树脂工业污染物排放标准》（GB31572-2015）表 5 标准
厂区内	非甲烷总烃		执行《江苏省大气污染物综合排放标准》（DB32/4041-2021）表 2 标准
综上所述，本项目投产后对区域大气环境质量影响极小。			
2、废水 （1）废水类别 建设项目采取“雨污分流”原则，雨水经市政雨水管网收集后排入区域雨水管网； 本项目产生的废水为生活污水，经市政污水管网排入昆山市千灯琨澄水质净化有限公司处理。冷却用水循环使用不外排。			
（2）产污环节 建设项目用水量为 650t/a，其中员工生活用水为 450t/a，冷却用水 200t/a，员工办公生活产生生活污水，冷却用水全部循环使用不外排。			
（3）污染物种类、浓度、产生量 建设项目职工定员 15 人，生活用水按 100L/（人•天）核算，职工生活用水为 450t/a，产污系数按 0.8 计，则生活污水产生量约为 360t/a，污水中的主要污染物为 COD、SS、氨氮、总磷，接管进入昆山市千灯琨澄水质净化有限公司，达“苏州特别排放限值标准”标准及《城镇污水处理厂污染物排放标准》（GB18918-2002）的表 1 一级 A 标准后排入吴淞江。 建设项目脱模过程需要冷却水冷却，冷却水循环使用，不外排，本项目冷却水循环使用量为 0.83t/h，预计补充水量 200t/a。 具体数据详见表 4-9。			

表 4-9 本项目水污染物产生及排放情况											
污 染 源	污 水 量 t/a	污 染 物 名 称	产生情况		治 理 措 施	接管情况		治 理 措 施	排放情况		排 放 去 向
			产生浓度 (mg/L)	产生量 (t/a)		接管浓度 (mg/L)	接管量 (t/a)		排放浓度 (mg/L)	排放量 (t/a)	
职 工 生 活	360	COD	350	0.126	通过厂 区污水 管网与 城市污 水管网 对接	350	0.126	通过城市 污水管网 排入昆山 市千灯琨 澄水质净 化有限公 司处理	30	0.0108	吴 淞 江
		SS	190	0.0684		190	0.0684		10	0.0036	
		NH ₃ -N	48	0.01728		48	0.01728		1.5	0.00054	
		TP	6	0.00216		6	0.00216		0.3	0.000108	
(4) 废水排放信息表											
项目污水接管口已根据江苏省环保厅《江苏省排污口设置及规范化整治管理办法》进行规范化设置。											
表 4-10 废水间接排放口基本情况表											
序 号	排 放 口 编 号	排放口地理坐标		废 水 排 放 量 (万 t/a)	排 放 去 向	排 放 规 律	间 歇 排 放 时 段	受纳污水处理厂信息			
		经度	纬度					名称	污 染 物 种 类	国家或地方污 染物排放标准 浓度限值/ (mg/L)	
1	DW001	E 121.055192	N 31.231822	0.036	市 政 污 水 管 网	间 歇 式	排放期间 流量不稳 定，但有 周期性规 律	昆山市 千灯琨 澄水质 净化有 限公司	COD	30	
									SS	10	
									NH ₃ -N	1.5	
									TP	0.3	
表 4-11 废水污染物排放信息表											
序号	排放口编号	污染物种类	排放浓度 (mg/L)	日排放量 (t/d)	年排放量 (t/a)						
1	DW001	COD	350	0.00042	0.126						
2		SS	190	0.000228	0.0684						
3		NH ₃ -N	48	0.0000576	0.01728						
4		TP	6	0.0000072	0.00216						
全厂排放口合计		COD			0.126						
		SS			0.0684						
		NH ₃ -N			0.01728						
		TP			0.00216						

表 4-12 环境监测计划及记录信息表									
序号	排放口编号	污染物种类	监测设施	自动监测设施安装位置	自动监测设施的安 装、运行、维护等相 关管理要求	自动监测是否联网	手工监测采样方法及个数 ^a	手工监测频次 ^b	手工测定方法 ^c
1	DW001	COD	—	—	—	—	混合采样	1次/年	水质重铬酸钾测点法
2		SS	—	—	—	—	混合采样	1次/年	水质悬浮物的测定重量法
3		NH ₃ -N	—	—	—	—	混合采样	1次/年	纳氏试剂比色法或水杨酸分光光度法
4		TP	—	—	—	—	混合采样	1次/年	钼锑抗分光光度法

注：a 指污染物采样方法，如“混合采样（3 个、4 个或 5 个混合）”“瞬时采样（3 个、4 个或 5 个瞬时样）”。b 指一段时期内的监测次数要求，如 1 次/周、1 次/月等。c 指污染物浓度测定方法。按照《排污单位自行监测技术指南总则》（HJ819-2017）设定监测频次。

（5）依托污水处理厂的可行性评价

昆山市千灯琨澄水质净化有限公司位于千灯镇曼氏路 8 号，该污水厂按“统一规划、分期建设”的原则，建设总规模为 3 万吨/天，其中一期 0.5 万吨/天、二期 1.0 万吨/天、三期 1.5 万吨/天已建成并投入运行，处理工艺采用生物脱氮除磷 A²/O 氧化沟工艺，同时进行深度处理（活性砂滤+化学加药除磷+紫外消毒）。

据调查，目前昆山市千灯琨澄水质净化有限公司余量 0.55 万吨天，本项目废水产生 1.2 吨/天，占，污水处理厂余量的 0.0218%，且其废水排放量较小，水质简单，不会对污水处理厂正常运行造成影响，另外根据本项目废水产污情况分析，生活污水污染因子 COD350mg/L、SS 190mg/L、NH₃-N 48mg/L、TP 6mg/L，本项目产生的废水能够达到昆山市千灯琨澄水质净化有限公司的接管要求。因此，本项目生活污水排入昆山市千灯琨澄水质净化有限公司集中处理是可行的。。

区域污水管网建设情况：本项目位于昆山市千灯琨澄水质净化有限公司服务范围内，项目所在区域污水管网已建设到位，具备接管条件。

接管可行性：污水接管口根据江苏省环保厅《江苏省排污口设置及规范化整治管理办

	法》进行设置，建设项目必须实施“雨污分流”，建设项目生活污水达标后可由接管口进入市政污水管网，即整个企业只能设置污水排放口一个，雨水排口一个。同时应在排污口设置明显排口标志。 因此，项目建成后生活污水接入昆山市千灯琨澄水质净化有限公司集中处理是可行的，对周围水环境影响较小。 （6）结论 综上所述，本项目地表水环境评价等级为三级 B。污水处理厂有充足的容量容纳本项目排放的废水，不会导致污水厂超负荷运营，不会因为本项目的废水排放导致污水处理系统失效，本项目水质简单，可生化性强，不会对污水处理工艺造成冲击负荷，不会影响污水厂出水水质达标。项目废水经污水处理厂处理达“苏州特别排放限值标准”标准及《城镇污水处理厂污染物排放标准》（GB18918-2002）中的一级 A 标准后排入吴淞江，预计对纳污水体吴淞江水质影响较小。 建议该项目污水排放口根据江苏省环保厅《江苏省排污口设置及规范化整治管理办法》进行设置。厂区已实施“雨污分流”。同时应在排放口设置明显排口标志及装备污水流量计，对污水排放口设置采样点定期监测。 3、噪声 （1）噪声源强 本项目运行时的主要噪声源为注塑机（22 台）、拌料机（6 台）、粉碎机（8 台）、空压机（2 台）、冷却塔（2 台）、废气处理设施风机（2 台）等设备产生的噪声，其主要生产设备的噪声值约为 70~90dB(A)。噪声为间歇排放，存在的时间较短。项目选用低噪声设备，同时采取隔声、减振以及厂区绿化等措施，以起到隔声降噪作用。厂界噪声能达到《工业企业厂界环境噪声排放标准》（GB12348-2008）3 类标准。设备主要噪声源见下表。
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表 4-13 项目主要噪声源强调查一览表（室内源强）																				
序号	生产单元	声源名称	数量	噪声值 d B(A)	声源控制措施	空间相对位置/m			距室内边界距离/m				室内边界声级 /dB (A)	运行时段	建筑物插入损失 /dB(A)	建筑物外噪声				
						X	Y	Z	东	南	西	北				声压级 dB(A)	建筑物外距离/m			
																	东	南	西	北
1	车间	注塑机	22台	70	减振、隔声、距离衰减	99	200	0	19	16	22	6	70	07:00~23:00	25	45	60	200	99	34
2		拌料机	6台	70		99	200	0	19	16	22	6	70			45	60	200	99	34
3		粉碎机	8台	75		89	199	0	25	5	18	16	75			50	80	199	89	43
4		空压机	2台	90		101	194	0	6	19	34	2	90			65	61	194	101	30
5		冷却塔	2台	80		101	194	0	6	19	34	2	80			55	61	194	101	30
注：空间相对位置原点为企业西南角，Z 轴以地面高度为 0 点																				
表 4-14 项目主要噪声源强调查一览表（室外声源）																				
序号	声源名称	数量	空间相对位置			声源源强声功率级 /dB （A）	声源控制措施	运行时段												
			X	Y	Z															
1	废气处理设施风机	2台	99	193	0	85	减振、距离衰减	07:00~23:00												
注：空间相对位置原点为企业西南角，Z 轴以地面高度为 0 点.																				
(2) 噪声污染防治措施																				
1) 企业在选购设备时购置符合国家颁布的各类机械噪声标准的低噪声设备，保证运行时能符合工业企业车间噪声卫生标准，同时能保证达到厂界噪声控制值。																				
2) 对噪声污染大的设备，如风机等须配置减振装置，安装隔声罩或消声器。																				
3) 在噪声传播途径上采取措施加以控制，如强噪声源车间的建筑围护结构均以封闭为主，同时采取车间外及厂界的绿化，利用建筑物与树木阻隔声音的传播。																				

	4) 项目噪声污染防治工作执行“三同时”制度。对防振垫、隔声、吸声、消声器等降噪设备应进行定期检查、维修,对不符合要求的及时更换,防止机械噪声的升高。 5) 加强设备的维修保养,使设备处于最佳工作状态。 (3) 厂界和环境保护目标达标情况分析 项目区运营期噪声源主要为设备噪声,根据有关资料和类比调查,这些机械设备的单机噪声在 70~85dB(A)之间。依据《环境影响评价技术导则—声环境》(HJ2.4-2021)中的数学模型,选用点声源噪声发散衰减模式预测项目厂界噪声的达标情况。预测模式如下: a. 噪声贡献值 (Leqg) 计算公式为: $L_{eqg} = 10 \lg \left(\frac{1}{T} \sum_i t_i 10^{0.1 L_{Ai}} \right)$ 式中: Laqg——噪声贡献值, dB; T——预测计算的时间段, s; ti——i 声源在 T 时间段内的运行时间, s; LAi——i 声源在预测点产生的等效连续 A 声级, dB。 b. 无指向性点声源几何发散衰减的基本公式: $L_p(r) = L_p(r_0) - 20 \lg(r/r_0)$ 式中: LP(r)——预测点声压级, dB(A); LP(r0)——噪声源声压级, dB(A); r——预测点离噪声源的距离, m。 通过 a 公式得到叠加后的声源强度为 88.55dB(A), 考虑到设备基础减振能降低约 10dB(A), 厂房、车间窗隔声约 15dB(A), 因此本次预测按照降低后的声源强度进行。 c. 噪声预测值 预测点的贡献值和背景值按能量叠加方法计算得到的声级。 噪声预测值 (Leq) 计算公式为: $L_{eq} = 10 \lg (10^{0.1 L_{eqg}} + 10^{0.1 L_{eqb}})$ 式中: Leq——预测点噪声预测值, dB(A); Leqg——建设项目声源在预测点产生的噪声贡献值, dB(A); Leqb——预测点的背景噪声值, dB(A)。 d. 计算结果
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按上述预测模式，项目厂界噪声的达标情况见下表。

表 4-15 噪声预测结果与达标分析 单位：dB(A)

序号	声环境保护目标	噪声背景值 dB(A)	噪声现状值 dB(A)	噪声标准 dB(A)	噪声贡献值 dB(A)	噪声预测值 dB(A)	较现状增量 dB(A)	超标和达标情况
		昼间	昼间	昼间	昼间	昼间	昼间	昼间
1	东厂界	59	59	65	37.87	59.03	0.03	达标
2	南厂界	60	60	65	31.51	60.01	0.01	达标
3	西厂界	61	61	65	18.75	61	0	达标
4	北厂界	61	61	65	16.59	61	0	达标

综上，项目厂界外 50m 范围内没有敏感目标，经以上防护措施及墙体隔声和距离的自然衰减后，项目四周厂界昼间的噪声预测值全部低于《工业企业厂界噪声排放标准》（GB12348-2008）3 类标准限值，满足项目地声环境功能要求。因此，本项目的建设对项目地周边的声环境影响较小。

（4）噪声监测计划

表 4-16 噪声污染源监测计划

监测点位	监测项目	监测频率	执行排放标准
厂界四周外 1m 处	等效连续 A 声级	一次/季度	厂界执行《工业企业厂界环境噪声排放标准》（GB12348-2008）3 类

4、固体废弃物

（1）固废产生情况

根据《关于加强建设项目环评文件固体废物内容编制的通知》苏环办[2013]283 号，对建设项目生产过程中产生的各类固体废物进行分析。

本项目固废主要为原料拆包产生的废包装材料，注塑废气治理过程产生的废活性炭，粉碎粉尘收集过程产生的粉尘以及职工生活产生的生活垃圾。

一般工业固废：

①废包装材料

项目生产过程中伴有少量废包装材料产生，产生量约为 0.5t/a，属于一般工业固体废物，收集后外售综合利用。

②粉尘

项目粉尘产生量较少，通过加强车间通风，无组织达标排放，根据上述分析可知，粉尘产生量为 5kg/a，经收集后暂存于固废库内，外售给其他单位综合利用。

危险废物：

废活性炭

本项目废气处理设施中活性炭须定期更换，每套废气处理设施的活性炭填装量约 0.5t，活性炭每年更换一次，产生的废活性炭（HW49）约 1.08t/a，通过吨袋收集后委托有资质单位处理。

生活垃圾：

项目生活垃圾产生量按每人每天平均产生 0.5kg 计，则生活垃圾的产生量约 2.25t/a，采取袋装化，先集中，后由环卫部门定时清运进行无害化处理，无外排。

（2）固体废物属性判定

根据《中华人民共和国固体废物污染环境防治法》及《固体废物鉴别标准 通则》（GB34330-2017）的规定，判断建设项目生产过程中产生的副产物是否属于固体废物，判定依据及结果见下表。

表 4-18 建设项目副产物产生情况汇总表

序号	副产物名称	产生工序	形态	主要成分	预测产生量(吨/年)	种类判断*		
						固体废物	副产品	判定依据
1	废包装材料	拆包	固	塑料	0.5	√	×	《固体废物鉴别标准 通则》（GB34330-2017）
2	废活性炭	废气处理	固	活性炭、有机物	1.08	√	×	
3	粉碎粉尘	废气处理	固	塑料	0.005	√	×	
4	生活垃圾	员工生活	固	可燃物、可堆腐物	2.25	√	×	

注：*种类判断，在相应类别下打钩。

（3）固体废物产生情况汇总（2021 年）以及危险废物鉴别标准、《一般固体废物分类与代码》（GB/T 39198-2020），建设项目固体废物分析结果汇总如下表所示。

表 4-19 项目固体废物分析结果汇总表

序号	固废名称	属性	产生工序	形态	危险特性鉴别方法	危险特性	废物类别	废物代码	预测产生量
1	废包装材料	一般工业固废	拆包	固	《国家危险废物名录》（2021 年）以及危险废物	/	06	292-999-06	0.5

2	粉碎 粉尘		废气处理	固	物鉴别标准、 《一般固体废物 分类与代码》 (GB/T 39198-2020)		66	900-999-66	0.005
3	废活 性炭	危险废 物	废气处理	固		T	HW49	900-039-49	1.08
4	生活 垃圾	一般固 废	职工生活	固		/	99	900-999-99	2.25

为降低项目项目危险废物对周边或相关环境的影响，企业拟采取如下防治措施：项目危废拟交由专人进行管理，活性炭定期更换，废活性炭利用专用容器运送至危废贮存场所暂存，定期委托有资质单位处置。

建设项目危废产生、储存、处置等情况见表 4-18。

表 4-20 建设项目危险废物汇总表

危险 废物 名称	危 险 特 性	危险废 物类别	废物代码	产生量 (t/a)	产生 工序 及装 置	形 态	主要成 分	有 害 成 分	产 废 周 期	污染防治措施
废活 性炭	T	HW49	900-039-49	1.08	废气 处理	固	活性炭、 有机物	有机 物	1 次 1 年	袋装，厂内转运 至危废暂存点， 分区贮存

(3) 环境管理要求

一般工业固废：

企业在车间东侧设置 5m² 的一般固废暂存点，废包装材料等采用桶装盛装暂存于一般固废暂存点，最终外售综合利用，生活垃圾采取袋装化，先集中，后由环卫部门定时清运进行无害化处理。

一般固废暂存点按照《一般工业固体废物贮存和填埋污染控制标准》(GB18599-2020) 及 2013 年修改单的要求建设，且做到以下要求：

①一般固废贮存、处置场应采取防止粉尘污染的措施；

②为防止雨水径流进入贮存、处置场内，避免渗滤液量增加和滑坡，贮存、处置场周边设置导流渠；

③一般工业固体废物贮存、处置场，禁止危险废物和生活垃圾混入。

危险废物：

表 4-21 建设项目危险废物贮存场所（设施）基本情况

贮存场所 名称	危险废物名 称	废物 类别	废物代码	位置	占地面积 m ²	贮存方 式	贮存 能力 t	贮存 周期
危废间	废活性炭	HW49	900-039-49	车间东 北侧	5	袋装	2	1 年

	企业在车间东北侧设置 5m² 的危废暂存点，本项目危险废物共 1.08t/a，采用袋装方式密闭贮存，计划每年转运一次，项目危废储存区设计储存能力为 2t，满足危废储存要求，因此项目危废储存区是合理的。 （4）危险废物贮存场所（设施）环境影响分析 ①对环境空气的影响 项目危险废物储存时环境温度为常温，其内有机物挥发性很小，且贮存过程中按必须要求以密封包装，无废气逸散，因此对周边大气环境基本无影响。 ②对地表水的影响： 项目危废储存区位于车间内，地面做好防腐、防渗处理，同时针对液态危废还建有导流沟和收集槽（导流沟、收集槽做好防腐、防渗处理），因此具有防雨、防漏、防渗措施，当事故发生时，不会产生废液进入厂区雨水系统，对周边地表水产生不良影响。 ③对地下水的影响： 危险废物储存区按照《危险废物贮存污染控制标准（GB18597-2001）》及修改单要求，进行防腐、防渗，暂存场所地面铺设等效 2mm 厚高密度聚乙烯防渗层，渗透系数 $\leq 10^{-10}$ cm/s，设集液托盘，正常情况下不会泄漏至室外污染土壤和地下水，不会对区域地下水环境产生影响。 ④对环境敏感保护目标的影响： 本项目暂存的危险废物都按要求妥善保管，暂存场地地面按控制标准的要求做了防渗漏处理，一旦发生泄漏事故及时采取控制措施，环境风险水平在可控制范围内。 （5）运输过程的环境影响分析 项目危险废物在处置单位来厂收货或运输的过程中，如不按照有关规范和要求对危险废物进行包装，会污染厂区土壤和地下水，遇下雨经地表径流进入河流会引起地表水体的污染。应将危险废物全部采用加盖桶装，顶部的出料口旋紧后整体密闭，可以有效避免危险废物在厂区内收货、运输过程中的挥发、溢出和渗漏。 项目危险废物在运输过程中发生泄漏时，接触土壤、水体会造成一定程度的污染。项目各危险固废均按照相应的包装要求进行包装，企业危险固废外运委托有资质的单位进行运输；主要采用公路运输，运输过程严格按照《道路危险货物运输管理规定》执行，运输路线主体原则为：转运车辆运输途中不得经过医院、学校和居民区等人口密集区域，避开饮用水水源保护区、自然保护区等环境敏感区；运输车辆按 GB13392 设置车辆标志，且在危险废物包装上设置毒性及易燃性标志。 综上，危险废物运输严格按照《危险废物收集贮存运输技术规范》(HJ2025-2012)和
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《危险废物转移联单管理办法》相关要求执行，危险废物运输控制措施可行。

(6) 委托利用或者处置的环境影响分析

建设单位须针对固废对员工进行培训，加强安全生产及防止污染的意识，培训通过后方可上岗，将危险废物的实际产生、贮存、利用、处置等情况纳入生产记录，建立危险废物管理台账和企业内部产生和收集、贮存、转移等部门危险废物交接制度。当危废需要委托有资质单位进行转移时，联系当地环保部门通过“江苏省危险废物动态管理信息系统”(<http://www.jswfgl.net/login.jsp>)进行危险废物申报登记。

通过采取上述措施和管理方案，可满足危险废物临时存放相关标准的要求，将危险废物可能带来的环境影响降到最低。

A、危险废物转运过程中的环境影响

建设项目危险废物产生后放入专门盛装危险废物的容器或防漏胶袋中，由带有防渗漏托盘的拖车转运至危废暂存点，转运过程中由于人为操作失误造成容器倒翻、胶袋破损等情况时，大部分会进入托盘中，对周围环境会产生一定的影响，因此企业在加强管理的情况下，转运过程中出现散落、泄漏概率较小，对周围环境影响较小。

B、委托利用或者处置的环境影响分析

项目产生的危废主要有废活性炭（HW49），危废需要由具有相应的危险废物经营许可证类别和足够的利用处置能力的供应商回收和委托有资质单位处理。具体的危废处置单位详见市环境保护局官方网站 http://sthjj.suzhou.gov.cn/szhbj/gfgl/xxgk_list.shtml。

建设项目所在地周边具有相关危废处置能力的单位详见下表。

表 4-22 建设单位周边危废处置单位详情

序号	单位名称	地址	联系电话	核准处置能力
1	苏州市荣望环保科技有限公司	相城区经济开发区上浜村	65796001	油/水/烃/水混合物或乳化液（HW09）、其他废物（HW49，仅限 309-001-49、900-039-49、900-040-49、900-041-49、900-042-49、900-046-49、900-047-49、900-999-49）、废催化剂（HW50，仅限 261-151-50、261-152-50、261-183-50、263-013-50、271-006-50、275-009-50、276-006-50、900-048-50）等处置量 20000t/a；
2	昆山市宁创环境科技发展有限公司	昆山市玉山镇高新区晨丰东路 228 号	57889576 、 13773143 912	收集、贮存 HW02（除 276-001-02、276-002-02、276-003-02、276-004-02、276-005-02）、HW03、HW04（除 263-001-04、263-002-04、263-004-04、263-005-04、263-007-04、263-009-04、263-012-04）、HW05、HW06（除 900-401-06、900-402-06 900-403-06、900-404-06）、HW08、HW09、HW11、HW12、HW13、HW16、HW17、

					HW35、HW37、HW49、HW50（限昆山市范围）
综上所述，本项目所产生的固体废物通过以上方法处理处置后，将不会对周围的环境产生影响，但厂内的堆放、贮存场所应按照国家固体废物贮存有关要求设置，在厂区内设置专门的区域作为固废堆放场地，树立显著的标志，由专门的人员进行管理，避免其对周围环境产生二次污染，采取上述措施后，建设项目产生的固废经妥善处理、处置后，可以实现零排放，对周围环境影响很小。 （7）污染防治措施及其经济、技术分析 ①一般固废贮存场所（设施）污染防治措施 本项目废包装材料等属于一般工业固废，应按照相关要求分类收集贮存，暂存场所应满足《一般工业固体废物贮存和填埋污染控制标准》（GB18599-2020）、《环境保护图形标志—固体废物贮存（处置场）》（GB15562.2-1995）等规定要求。 A、贮存、处置场的建设类型，必须与将要堆放的一般工业固体废物的类别相一致。 B、贮存、处置场应采取防止粉尘污染的措施。 C、为防止雨水径流进入贮存、处置场内，避免渗滤液量增加和滑坡，贮存、处置场周边应设置导流渠。 D、应设计渗滤液集排水设施。 E、为防止一般工业固体废物和渗滤液的流失，应构筑堤土墙等设施。 F、为保障设施、设备正常运营，必要时应采取防止地基下沉，尤其是防止不均匀或局部下沉。 ②危险废物贮存场所（设施）污染防治措施 危险废物贮存场所位于租赁车间，根据上文分析，本项目危险废物贮存场所贮存能力满足要求。 A、贮存物质相容性要求：在常温常压下不水解、不挥发的固体危险废物可在贮存场所内分别堆放，除此之外的其他危险废物必须存放于容器中，存放用容器也需符合(GB18597- 2001)标准的相关规定；禁止将不相容(相互反应)的危险废物在同一容器中存放；无法装入常用容器的危险废物可用防漏胶袋等盛装。 B、包装容器要求：危险废物贮存容器应当使用符合标准的容器盛装危险废物，装载					

危险废物的容器及材质要满足相应的强度要求，完好无损，盛装危险废物的容器材质和衬里要与危险废物相容。

C、危险废物贮存场所要求：对于危险废物暂存区域应严格按照《危险废物贮存污染控制标准》(GB18597-2001)及其修改单中的相关规定，地面进行耐腐蚀硬化处理，地基须防渗，地面表面无裂缝；不相容的危险废物需分类存放，并设置隔离间隔断；满足（防风、防雨、防晒、防渗漏），具备警示标识等方面内容。

表 4-23 危废暂存场所建设要求

项目	具体要求	简要说明
收集、贮存、运输、利用、处置固危废的单位	A.贮存场所地面硬化及防渗处理；	地面硬化+环氧地坪
	B.场所应有雨棚、围堰或围墙，并采取措施禁止无关人员进入；	防流失
	C.设置废水导排管道或渠道；	场所四周建设收集槽（仓库四周有格栅盖板），并汇集到收集池
	D.将冲洗废水纳入企业废水处理设施处理或危险废物管理；	冲洗废水、渗滤液、泄漏物一律作为危废管理
	E.贮存液态或半固态废物的，需设置泄露液体收集装置；	托盘
	F.装载危险废物的容器完好无损；	装载危险废物的容器完好无损

表 4-24 危废暂存场所“三防”措施要求

“三防”	主要具体要求	危废对象
防扬散	全封闭	易挥发类
	负压集气处理系统	
	遮阳	高温照射下易分解、挥发类
	防风、覆盖	粉末状
防流失	室内仓库或雨棚	所有
	围墙或围堰，大门上锁	
	出入口缓坡	
	单独封闭仓库，双锁	剧毒
防泄漏	包装容器须完好无损	液体、半固体类危废
	地面硬化、防渗防腐	
	渗漏液体收集系统	

D、危险废物暂存管理要求

危废暂存间设立危险废物进出台账登记管理制度，记录每次运送流程和处置去向，严格执行危险废物电子联单制度，实行对危险废物从源头到终端处理的全过程监管，确保危险废物 100%得到安全处置。

生活垃圾收集后，应袋装化，每日由环卫部门统一清运。

（8）运输过程的污染防治措施

危险废物的收集、运输按照《危险废物收集、贮存、运输技术规范》（HJ2025-2012）

| | <p>的要求进行。在运输过程中，按照《江苏省固体废物污染环境防治条例》中对危险废物的包装、运输的有关标准、技术规范和要求进行，有效防止危险废物转移过程中污染环境。项目需处理的危险废物采用专门的车辆，密闭运输，严格禁止抛洒滴漏，杜绝在运输过程中造成环境的二次污染。在危险废物的运输中执行《危险废物转移联单管理办法》中有关的规定和要求。</p> <p>建设单位须针对此对员工进行培训，加强安全生产及防止污染的意识，培训通过后方可上岗，对于固体废弃物的收集、运输要实施专人专职管理制度并建立好台账。</p> <p>(9) 环境管理与监测</p> <p>①本项目在日常营运中，应制定固废管理计划，将固废的产生、贮存、利用、处置等情况纳入生产记录，建立固废管理台账和企业内部产生和收集贮存部门危险废物交接制度。加强对危险废物包装、贮存的管理，严格执行危险废物转移联单制度，危险废物运输应符合本市危险废物运输污染防治技术规定，禁止将危险废物提供或委托给无危险废物经营许可证的单位从事收集、贮存、利用、处置等经营活动。</p> <p>②建设单位应通过“江苏省危险废物动态管理信息系统”（江苏省环保厅网站）进行危险废物申报登记。</p> <p>③企业为固体废物污染防治的责任主体，应建立风险管理及应急救援体系，执行环境监测计划、转移联单管理制度及国家和省有关转移管理的相关规定、处置过程安全操作规程、人员培训考核制度、档案管理制度、处置全过程管理制度等。</p> <p>④危险废物贮存场所按照要求设置警告标志，危废包装、容器和贮存场所应按照《危险废物贮存污染控制标准》（GB18597-2001）有关要求张贴标识。</p>

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	表 4-25 固废区环境保护图形标志																																																																																																																																																																																																																																																																																																																																																																																																																																																

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| | <table><tr><th>序号</th><th>排放口名称</th><th>图形标志</th><th>形状</th><th>背景颜色</th><th>图形颜色</th><th>提示图形符号</th></tr><tr><td>1</td><td>一般固废暂存点</td><td>提示标志</td><td>正方形边框</td><td>绿色</td><td>白色</td><td></td></tr><tr><td>2</td><td>危废暂存点</td><td>信息公开</td><td>长方形边框</td><td>蓝色</td><td>白色</td><td><div><p>危险废物产生单位信息公开</p><div><p>企业名称：XXXXXXXXXXXXXXXXXXXX</p><p>地址：XXXXXXXXXXXXXXXXXXXX</p><p>法人代表及电话：XXXXXXXXXXXXXXXXXXXX</p><p>环保负责人及电话：XXXXXXXXXXXXXXXXXXXX</p><p>危险废物产生过程：XXXXXXXXXXXX</p><p>危险废物的存放数量：仓库XXXX处，桶装XXXX处</p><p>危险废物的存放建筑面积（容积）：</p><p>仓库 XXXX 平方米，储罐 XXXX
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 | 序号 | 排放口名称 | 图形标志 | 形状 | 背景颜色 | 图形颜色 | 提示图形符号 | 1 | 一般固废暂存点 | 提示标志 | 正方形边框 | 绿色 | 白色 |  | 2 | 危废暂存点 | 信息公开 | 长方形边框 | 蓝色 | 白色 | <div><p>危险废物产生单位信息公开</p><div><p>企业名称：XXXXXXXXXXXXXXXXXXXX</p><p>地址：XXXXXXXXXXXXXXXXXXXX</p><p>法人代表及电话：XXXXXXXXXXXXXXXXXXXX</p><p>环保负责人及电话：XXXXXXXXXXXXXXXXXXXX</p><p>危险废物产生过程：XXXXXXXXXXXX</p><p>危险废物的存放数量：仓库XXXX处，桶装XXXX处</p><p>危险废物的存放建筑面积（容积）：</p><p>仓库 XXXX 平方米，储罐 XXXX
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| 2 | 危废暂存点

 | 信息公开 | 长方形边框 | 蓝色 | 白色 | <div><p>危险废物产生单位信息公开</p><div><p>企业名称：XXXXXXXXXXXXXXXXXXXX</p><p>地址：XXXXXXXXXXXXXXXXXXXX</p><p>法人代表及电话：XXXXXXXXXXXXXXXXXXXX</p><p>环保负责人及电话：XXXXXXXXXXXXXXXXXXXX</p><p>危险废物产生过程：XXXXXXXXXXXX</p><p>危险废物的存放数量：仓库XXXX处，桶装XXXX处</p><p>危险废物的存放建筑面积（容积）：</p><p>仓库 XXXX 平方米，储罐 XXXX
升</p><p>厂区平面示意图</p></div><table><tr><th>危险废物</th><th>危险废物</th><th>环评批文</th><th>产生来源</th><th>污染防治措施</th><th>危险废物</th><th>危险废物</th><th>环评批文</th><th>产生来源</th><th>污染防治措施</th></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXXXXXXXXXXXXXXXXXX</td></tr><tr><td>XXXXXXXXXXXXXXXXXXXX</td><td>XXXX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3	警示标志	长方形边框	黄色	黑色	危险废物贮存设施 (第×-×号) 企业名称: ×××××××××× 责任人及电话: ×××××××××× 管理员及电话: ×××××××××× 本设施环评批文: ×××××××××× 本设施建筑面积(容积): ×××××× 本设施环境污染防治措施: ☐ 防风 ☐ 防雨 ☐ 防晒 ☐ 防雷 ☐ 防扬散 ☐ 防流失 ☐ 防渗漏 ☐ 泄漏液体收集 ☐ 贮存废气收集 环境应急物资和设备: ×××××××××××××××× ×××××××××××××××× 本设施贮存危险废物清单: 种类1: ×××××××××× 危险特性: ×××××××× 环评批文: ×××××××× 种类2: ×××××××××× 危险特性: ×××××××× 环评批文: ×××××××× 种类3: ×××××××××× 危险特性: ×××××××× 环评批文: ×××××××× 种类4: ×××××××××× 危险特性: ×××××××× 环评批文: ×××××××× 种类5: ×××××××××× 危险特性: ×××××××× 环评批文: ×××××××× 种类6: ×××××××××× 危险特性: ×××××××× 环评批文: ×××××××× ×××生态环境局监制
4	警示标志	长方形边框	黄色	黑色	废物名称: ×××××× 废物代码: ***-***-*** 主要成分: ×××××× 危险特性: ×××××× ×××, ×××× 环境污染防治措施: ×××, ××××, ××× ××××, ×××××× 环境应急物资和设备: ×××××××××××× ×××××××× ×××生态环境局监制
5	危废标签	包装识别标签	桔黄色	黑色	危险废物 主要成分: 化学名称: 危险情况: 安全信息: 废物产生单位: 地址: 电话: 联系人: 地点: 数量: 出厂日期: 危险类别: ☐ 爆炸性 ☐ 易燃 ☐ 氧化 ☐ 毒性 ☐ 腐蚀性 ☐ 刺激性 ☐ 其他

(10) 结论与建议

经采取上述措施后，本项目产生的固废均能有效处置，实现零排放，符合环保要求，同时做到固废收集、贮存、运输和处置等环节的污染控制，不会对周围环境造成不良影响。

5、环境风险分析

本项目环境风险评价的目的是分析和预测项目存在的潜在风险、有害因素，项目运行期间可能发生的突发性事件或事故（一般不包括人为破坏及自然灾害），引起有毒有害和易燃易爆等物质泄漏，所造成的人身安全与环境影响和损害程度，提出合理可行的防范、应急与减缓措施，以使建设项目事故率、损失和环境影响达到可接受水平。

(1) 风险识别

根据《危险化学品重大危险源辨识》（GB 18218-2018）中规定，本项目不存在重大

	危险源。但本项目所产生的危废属于一般毒性物质。 (2) 风险类型 ①物质危险性识别：包括主要原辅材料、中间产品、副产品、最终产品、污染物、火灾和爆炸伴生/次生物等。 ②生产过程潜在危险性识别：在正常使用过程中本项目化学品一般对周围环境和人体造成的影响可以控制在允许范围内；但是如果发生泄漏，就可能产生意想不到的事故——火灾、爆炸危险物质泄漏可能造成火灾或爆炸。 ③储运设施风险识别：危险废物暂存于危废暂存间，一旦发生物料泄露，若危废仓库地面未做防渗处理，可能将通过地面渗漏，进而影响土壤和地下水。 ④运输工程风险识别：运输过程中，危险废物包装若遭遇事故发生破裂泄漏，可燃性物质若遇明火会引发火灾爆炸。 ⑤环保设施危险性识别：废气处理系统出现故障停运时，厂内的废气未经处理直接排放入大气中会影响周围环境空气质量，严重时危及人群健康。 ⑥危险废物若储存、处置不当，则会产生其内物质泄露，导致周围土壤、水体等的污染。 (3) 环境风险评价等级 根据《建设项目环境风险评价技术导则》（HJ/T169-2018）中附录 C，计算所涉及的每种危险物质在厂界内的最大存在总量与其在附录 B 中对应临界量的比值 Q。在不同厂区的同一种物质，按其在厂界内的最大存在总量计算。对于长输管线项目，按照两个截断阀室之间管段危险物质最大存在总量计算。 当只涉及一种危险物质时，计算该物质的总量与其临界量比值，即为 Q；当存在多种危险物质时，则按式（C.1）计算物质总量与其临界量比值（Q）： $Q = q_1/Q_1 + q_2/Q_2 + q_3/Q_3 + \dots + q_n/Q_n \quad (C.1)$ 式中：q₁, q₂, ..., q_n——每种危险物质的最大存在总量，t； Q₁, Q₂, ..., Q_n——每种危险物质的临界量，t。 当 Q<1 时，该项目环境风险潜势为 I。 当 Q≥1 时，将 Q 值划分为：（1）1≤Q<10；（2）10≤Q<100；（3）Q≥100。 当 Q<1 时，企业直接评为一般环境风险等级，该项目环境风险潜势为 I。当 Q≥1 时，将 Q 值划分为：（1）1≤Q<10；（2）10≤Q<100；（3）Q≥100，分别以 Q₁、Q₂ 和 Q₃ 表示。 对比《建设项目环境风险评价技术导则》（HJ169-2018）附录 B，本项目危险物质为
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废活性炭。其 Q 值计算如下：

表 4-26 突发环境事件风险物质 Q 值计算表

序号	物质品种	物质名称	最大量（吨）	临界量（吨）	Q 值
1	一般毒性物资 (类别 2,3)	废活性炭	1.08	50	0.0216
合计					0.0216

根据表 4-24，本项目 Q 小于 1，环境风险潜势为 I，故开展环境风险简单分析即可。

①评价等级判定：

根据《建设项目环境风险评价技术导则》（HJ 169-2018），本项目环境风险潜势为 I，评价等级为简单分析。

表 4-27 风险评价工作等级划分

环境风险潜势	IV、IV+	III	II	I
评价工作等级	一	二	三	简单分析 a

a 是对于详细评价工作内容而言，在描述危险物质、环境影响途径、环境危害后果、风险防范措施等方面给出定性的说明。见附录 A。

②事故风险分析结论：

建设项目经采取有效的事故防范、减缓措施，加强风险防范和应急预案，环境风险可控。

表 4-28 建设项目环境风险简单分析内容表

建设项目名称	昆山扩庄智能装备有限公司塑料制品制造项目				
建设地点	（江苏） 省	（苏州）市	（/）区	（/） 县	昆山市千灯镇 鹿场路 468 号 12 号房
地理坐标	经度	121.055696	纬度	31.231868	
主要危险物质 及分布	主要危险物质			分布	
	废活性炭			危废暂存场、原料仓	
环境影响途径 及危害后果 （大气、地表 水、地下水等）	本项目风险物质主要分布在危废暂存间、原料仓，环境影响途径主要是：废活性炭泄漏引起的环境事故，对环境造成影响。				
风险防范措施 要求	（1）完善危险物质贮存设施，加强对物料储存、使用的安全管理和检查，避免物料出现泄漏。 （2）落实安全检查制度，定期检查，排除火灾隐患；加强厂区消防检查和管理，在厂区按照消防要求设置灭火器材。 （3）要加强对各岗位员工进行风险意识、风险知识、安全技能、规章制度、应变能力等素质等各方面的培训和教育。 （4）企业应当按照安全监督管理部门和消防部门要求，严格执行相关风险控制措施。 （5）企业编制突发环境事件应急预案，配备应急器材，在发生泄漏、				

	火灾和爆炸等事故时控制泄漏物和消防废水进入下水道。企业应完善突发环境事故应急措施。 (6) 做好总图布置和建筑物安全防范措施。 (7) 准备各项应急救援物资。 (8) 仓库区禁止吸烟, 远离火源、热源、电源, 无产生火花的条件, 禁止明火作业; 设置醒目易燃品标志。
填表说明(列出项目相关信息及评价说明)	本表根据《建设项目环境风险评价技术导则》(HJ/T169-2018)中“简单分析”工作等级在危险物质、环境影响途径、环境危害后果、风险防范措施等方面给出定性的说明。
(5) 环境风险评价结论 综上, 在各环境风险防范措施落实到位的情况下, 将可大大降低建设项目的环境风险, 最大程度减少对环境可能造成的危害。在企业落实本评价提出的各项风险防范措施后, 项目对环境的风险影响可接受。 6、土壤、地下水影响分析 根据《建设项目环境影响报告表》内容、格式及编制技术指南, 本次评价将分析地下水、土壤污染源、污染物类型和污染途径, 按照分区防控要求提出相应的防控措施。 6.1 土壤、地下水污染源分析 对土壤和地下水的污染类型主要为液体渗透进入土壤, 造成土壤及地下水的污染, 主要包括污水管道、危险废物暂存间对土壤及地下水的污染。 根据项目所在地深、浅层地下水的补给、径流和排泄途径方式, 结合本工程排放的主要污染物, 分析得出建成工程对浅层空隙水和深层空隙水的污染途径和影响主要有以下方面: (1) 厂区内生活污水管网若发生渗漏, 会对厂区所在地的浅层空隙水水质造成污染。对污水排放管道进行防腐、防渗处理, 同时定期进行隐患排查, 可避免正常情况下的渗漏。 (2) 危险废物暂存间若发生液体渗漏, 有可能污染周边土壤, 并下渗进而污染地下水。严格按照《危险废物贮存污染控制标准》(GB18597-2001 及 2013 年修改单) 建设危险废物暂存间, 可避免正常情况下的渗漏。 6.2 分区防控措施 (1) 污水管道属于一般防渗区, 防渗技术要求为等效黏土防渗层 $M_b \geq 1.5m$, $K \leq 1 \times 10^{-7} cm/s$, 或参照 GB16889 执行。 污水管道采用柔性防渗结构, 采用厚度不小于 1.0mm 的土工膜防渗。 (2) 危险废物暂存间属于重点防渗区, 防渗技术要求为等效黏土防渗层 $M_b \geq 6.0m$, $k \leq 1 \times 10^{-7} cm/s$, 或参照 GB18598 执行。 危险废物暂存间按照《危险废物贮存污染控制措施》(GB 18597-2001 及 2013 修改	

单)的防渗设计要求,防渗层为至少 1m 厚黏土层(渗透系数 $\leq 10^{-7}\text{cm/s}$),或 2mm 厚高密度聚乙烯,或至少 2mm 厚的其它人工材料,渗透系数 $\leq 10^{-10}\text{cm/s}$ 。严格按照施工规范施工,保证施工质量。

全厂分区防渗区划见表 4-29。

表 4-29 本项目分区防渗方案及防渗措施表

序号	防治分区	分区位置	防渗要求
1	一般污染防治区	污水管道	地面基础防渗和构筑物防渗等级达到渗透系数 $\leq 1.0 \times 10^{-7}\text{cm/s}$,相当于不小于 1.5m 厚的粘土防护层
2	重点防渗区	危废库	危险废物暂存间按照《危险废物贮存污染控制措施》(GB 18597-2001 及 2013 修改单)的防渗设计要求,防渗层为至少 1m 厚黏土层(渗透系数 $\leq 10^{-7}\text{cm/s}$),或 2mm 厚高密度聚乙烯,或至少 2mm 厚的其它人工材料,渗透系数 $\leq 10^{-10}\text{cm/s}$ 。
3	简单防渗区	办公	一般地面硬化
4		普通仓库	

7、清洁生产与循环经济分析

清洁生产是实现经济和环境协调持续发展的重要途径之一,它是把工业污染控制的重点从原来的末端治理转移到全过程的污染控制,全过程体现在原料、工艺、设备、管理、三废排放、产品、销售、使用等各方面,从而使污染物的发生量、排放量最小化。该项目建成后,企业将做好清洁生产,可从以下几方面进行:

(1) 采用先进设备,改进工艺,尽量降低用电量,积极开展企业节能降耗工作。

(2) 减少污染物的产生量,加强废弃物的综合利用。

(3) 加强管理,完善清洁生产制度。加强生产中的现场管理,加强生产管理和设备维修,尽量减少和防止生产过程中的事故性排放,降低原辅材料的消耗。

8、安全风险辨识

依据苏州生态环境局《关于做好生态环境和应急管理部门联动工作的意见》要求,企业要对脱硫脱硝、煤改气、挥发性有机物回收、污水处理、粉尘治理、RTO 焚烧炉等六类环境治理设施开展安全风险辨识管控,要健全内部污染防治设施稳定运行和管理责任制度,严格依据标准规范建设环境治理设施,确保环境治理设施安全、稳定、有效运行。企业具有挥发性有机废气环境治理措施(活性炭),因此需开展安全风险辨识。

(1) 环保设施辨识

表 4-30 建设项目环保设施一览表

序号	类别	环保设施
1	挥发性有机物回收环境治理设施	二级活性炭吸附

	(2) 废气处理装置主要危险有害因素分析 火灾、爆炸 ①本装置处理尾气含醇脂类等高沸点物质，这类物质具有可燃特性，在高温时有易爆性，若在工艺过程中因操作不当或设备、管道破损、阀门损坏、设备故障或安全措施不到位、管理不善等而引起泄漏，则泄漏的尾气与空气可形成爆炸性混合物，在爆炸极限内遇明火、火花等激发能量则会导致火灾、爆炸事故； ②涉及易燃易爆尾气的设备、管道、机泵等未设置导除静电装置或失效，可能引起火灾、爆炸事故。 ③装置区存在着雷击的可能性，若无避雷设施或避雷设施未定期检测、失效，遭雷击时，可能发生火灾、爆炸事故。 ④若装置区电气设备选型不当或质量不合格，或电气设备老化、绝缘破损、过流、短路、接线不规范、电器使用不当等，易引起电气火灾并引发二次事故的发生。 ⑤装置内电气设备不防爆（机泵、开关、照明灯等）、使用易产生火花的工具或遇火源，均有引起着火灾、爆炸事故的可能。 ⑥装置区如安全管理不到位，在工艺过程中有工作人员或外来人员抽烟、使用手机，人体静电火花以及穿戴铁钉鞋与地面摩擦产生火花，若遇易燃蒸气，可能发生火灾、爆炸事故。 ⑦装置区属若与周边装置、设施的安全距离不足，一旦周边装置、设施发生火灾、爆炸事故，有可能会影响到本项目装置区，甚至引发火灾、爆炸事故。 ⑧违章动火有引起火灾、爆炸的危险。 ⑨设备及管线、机泵等开工时若未采用惰性气体氮气将设备、管线中的空气换掉，进料后物料等与空气混合达到一定比例时，会发生爆炸事故。 (3) 安全风险措施 生产设备自带多种安全装置，大致可分为物理防呆和机械防呆，每台设备均配有紧急停止按钮，遇到突发状况拍下即可使整个机台停止工作。机器的物理防呆为通过一些控制元器件对有安全隐患的区域进行防呆。 车间设备的四周设置安全指示黄线，当设备运作时，非作业人员一律不能进行安全黄线内，只有待设备进行维护或者检修时才能够进入。 废气处理设施安全措施如下： ①系统主要管道均采用 PP 材质，管道内设置静电导除设施； ②活性炭箱接地；
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	③排气筒设置防雷接地措施； ④进入活性炭前的主要管道处设置阻火装置； ⑤活性炭箱体设置应急喷淋降温装置； ⑥活性炭箱设置带有检测联动的温度传感装置； ⑦活性炭箱体设置泄爆口； ⑧活性炭箱设置火焰探测器、熄火装置及温度监测； 9、环境管理 企业应设置专门的环境管理部门，同时制定各类环境管理的相关规章、制度和措施的要求，具体包括： （1）定期报告制度 要定期向当地环保部门报告污染治理设施运行情况、污染物排放情况以及污染事故、污染纠纷等情况。 （2）污染处理设施的管理制度 对污染治理设施的管理必须与生产经营活动一起纳入企业的日常管理中，要建立岗位责任制，制定操作规程，建立管理台帐 （3）奖惩制度 企业应设置环境保护奖惩制度，对爱护环保设施，节能降耗、改善环境者实行奖励；对不按环保要求管理，造成环保设施损坏、环境污染和资源、能源浪费者予以处罚。 （4）制定各类环保规章制度 制定了全公司的环境方针、环境管理手册及一系列作业指导书以促进全公司的环境保护工作，使环境保护工作规范化和程序化，通过重要环境因素识别、提出持续改进措施，将全公司环境污染的影响逐年降低。
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五、环境保护措施监督检查清单

要素 \ 内容	排放口(编号、名称)/污染源	污染物项目	环境保护措施	执行标准
大气环境	排气筒 DA001	非甲烷总烃、氨气	集气罩+活性炭吸附装置+通过15m 排气筒排出	《合成树脂工业污染物排放标准》(GB31572-2015)表 5 标准
	排气筒 DA002	非甲烷总烃、氨气	集气罩+活性炭吸附装置+通过15m 排气筒排出	
	厂界无组织	颗粒物	厂区通风	《江苏省大气污染物综合排放标准》(DB32/4041-2021)表 3 标准
		非甲烷总烃		《合成树脂工业污染物排放标准》(GB31572-2015)表 9 标准
		氨气		《恶臭污染物排放标准》(GB14554-93)表 1 标准
	厂区内	非甲烷总烃	车间通风	《江苏省大气污染物综合排放标准》(DB32/4041-2021)表 2 标准
地表水环境	生活污水	pH、COD、SS、氨氮、TP	市政污水管网	昆山市千灯琨澄水质净化有限公司接管标准
声环境	注塑机、粉碎机等设备	Leq (A)	厂房隔音、距离衰减等	《工业企业环境噪声排放标准》(GB12348-2008) 3 类标准
电磁辐射	—	—	—	—
固体废物	一般工业固废收集后外售综合利用。一般固废由环卫清运处理。危险废物委托具有相应处理资质的单位处置。			
土壤及地下水污染防治措施	分区防控。主要包括污染区地面的防渗措施和泄漏、渗漏污染物收集措施,即在污染区地面进行防渗处理,防止洒落地面的污染物渗入地下,从而避免对地下水的污染。根据项目场地天然包气带防污性能、污染控制难易程度和污染物特性对项目进行分区防控。			
生态保护措施	不涉及			
环境风险防范措施	1、建立健全各种有关消防与安全生产的规章制度,建立岗位责任制。仓库、生产车间严禁明火。生产车间、仓库等场所配置足量的泡沫、干粉等灭火器,并保持完好状态。 2、厂区留有足够的消防通道。生产车间、仓库设置消防给水管道和消防栓。厂部要组织义务消防员,并进行定期的培训和训练。对有火灾危险的场所设置自动报警系统,一旦发生火灾,立即做出应急反应。			

	3、对于危废仓库，建设单位拟设置监控系统，主要在仓库出入口、仓库内、厂门口等关键位置安装视频监控设施，进行实时监控，并与中控室联网。贮存过程拟在液态危险废物贮存容器下方设置不锈钢托盘，或在危废暂存场所设置地沟等，发生少量泄漏立即将容器内剩余溶液转移，并收集托盘、地沟内泄漏液体，防止泄漏物料挥发到大气中。 4、厂区内的雨水管道、事故沟收集系统严格分开，设置切换阀。
其他环境 管理要求	本项目配套建设的环境保护设施必须与主体工程同时建成和投产使用，并按规定程序实施竣工环境保护验收，验收合格方可投入生产。

六、结论

综上所述，通过对项目所在地区的环境现状评价以及项目产生的环境影响分析，认为本项目在认真执行设计方案及环评中提出的污染防治措施后，产生的污染物对环境的影响很小，从环境保护的角度分析，昆山扩庄智能装备有限公司塑料制品制造项目的建设是可行的。

附表

建设项目污染物排放量汇总表

项目 分类	污染物名称		现有工程 排放量（固体废物产生量）①	现有工程 许可排放量 ②	在建工程 排放量（固体废物产生量）③	本项目 排放量（固体废物产生量）④	以新带老削减量 （新建项目不填）⑤	本项目建成后 全厂排放量（固体废物产生量）⑥	变化量 ⑦
	废气	有组织	非甲烷总烃	/	/	0	0.008978	/	0.008978
氨气			/	/	0	微量	/	微量	+微量
无组织		非甲烷总烃	/	/	0	0.004725	/	0.004725	+0.004725
		氨气	/	/	0	微量	/	微量	+微量
		颗粒物	/	/	0	0.00675	/	0.00675	+0.00675
废水	生活污水		/	/	0	360	/	360	+360
	COD		/	/	0	0.0108	/	0.0108	+0.0108
	SS		/	/	0	0.0036	/	0.0036	+0.0036
	氨氮		/	/	0	0.00054	/	0.00054	+0.00054
	TP		/	/	0	0.000108	/	0.000108	+0.000108
一般工业固体废物			/	/	0	0.505	/	0.505	+0.505
危险废物			/	/	0	1.08	/	1.08	+1.08

注：⑥=①+③+④-⑤；⑦=⑥-①

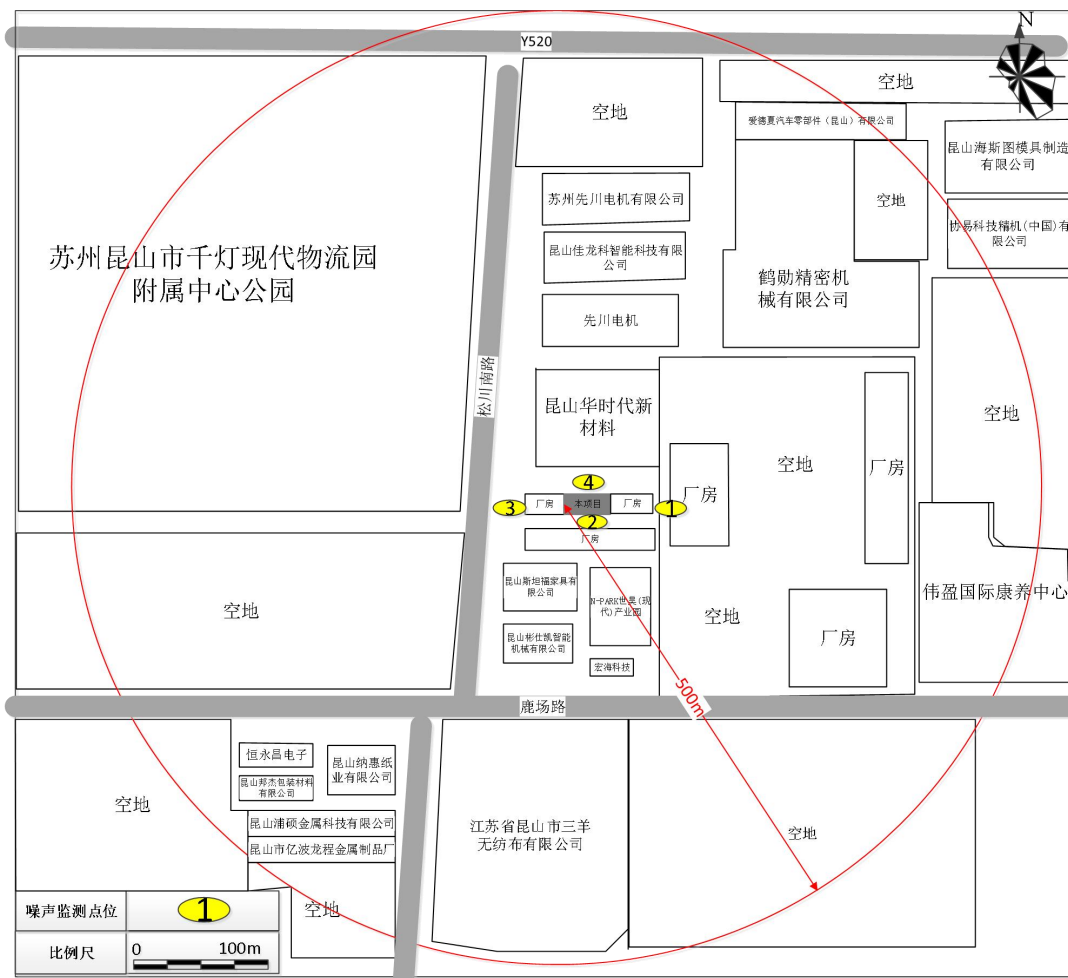
注释

- 附件 1 咨询合同
- 附件 2 备案证
- 附件 3 房屋租赁合同
- 附件 4 租赁方土地证
- 附件 5 营业执照
- 附件 6 城市排水许可证
- 附件 7 噪声监测报告
- 附件 8 固废承诺书
- 附件 9 公示截图

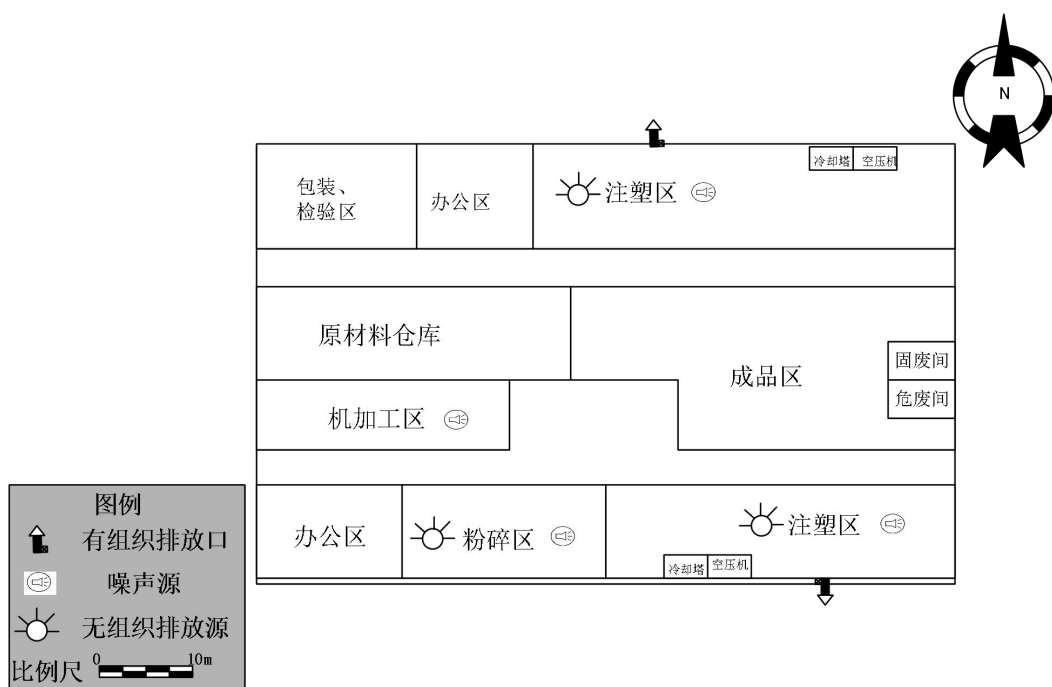
- 附图 1 建设项目地理位置图
- 附图 2 建设项目周边环境概况及噪声监测点位图
- 附图 3 厂区平面布置图
- 附图 4 昆山市 F04 规划编制单元控制性详细规划图
- 附图 5 昆山市生态红线图
- 附图 6 声环境功能区图
- 附图 7 项目厂区平面布置图



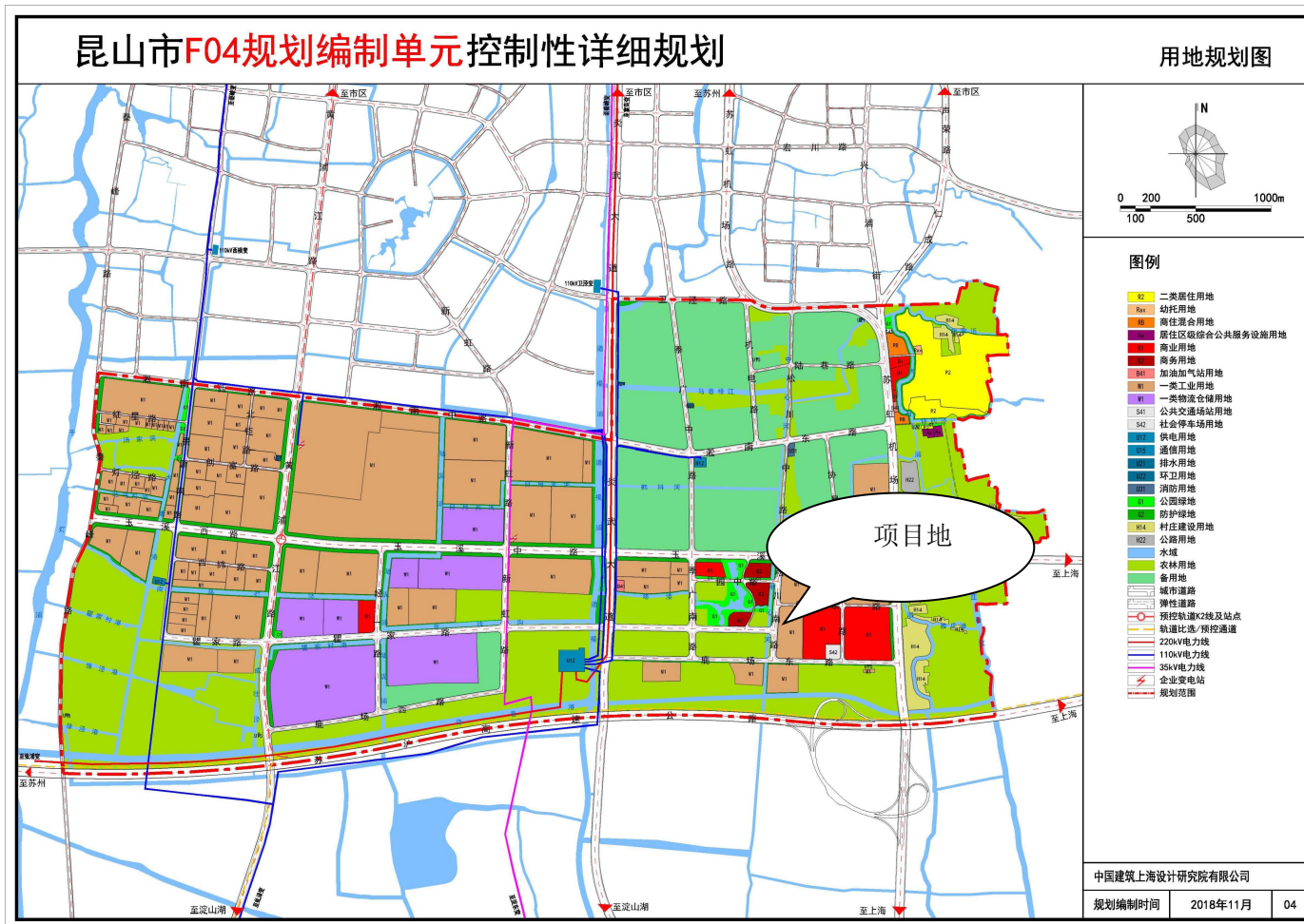
附图 1 项目地理位置图



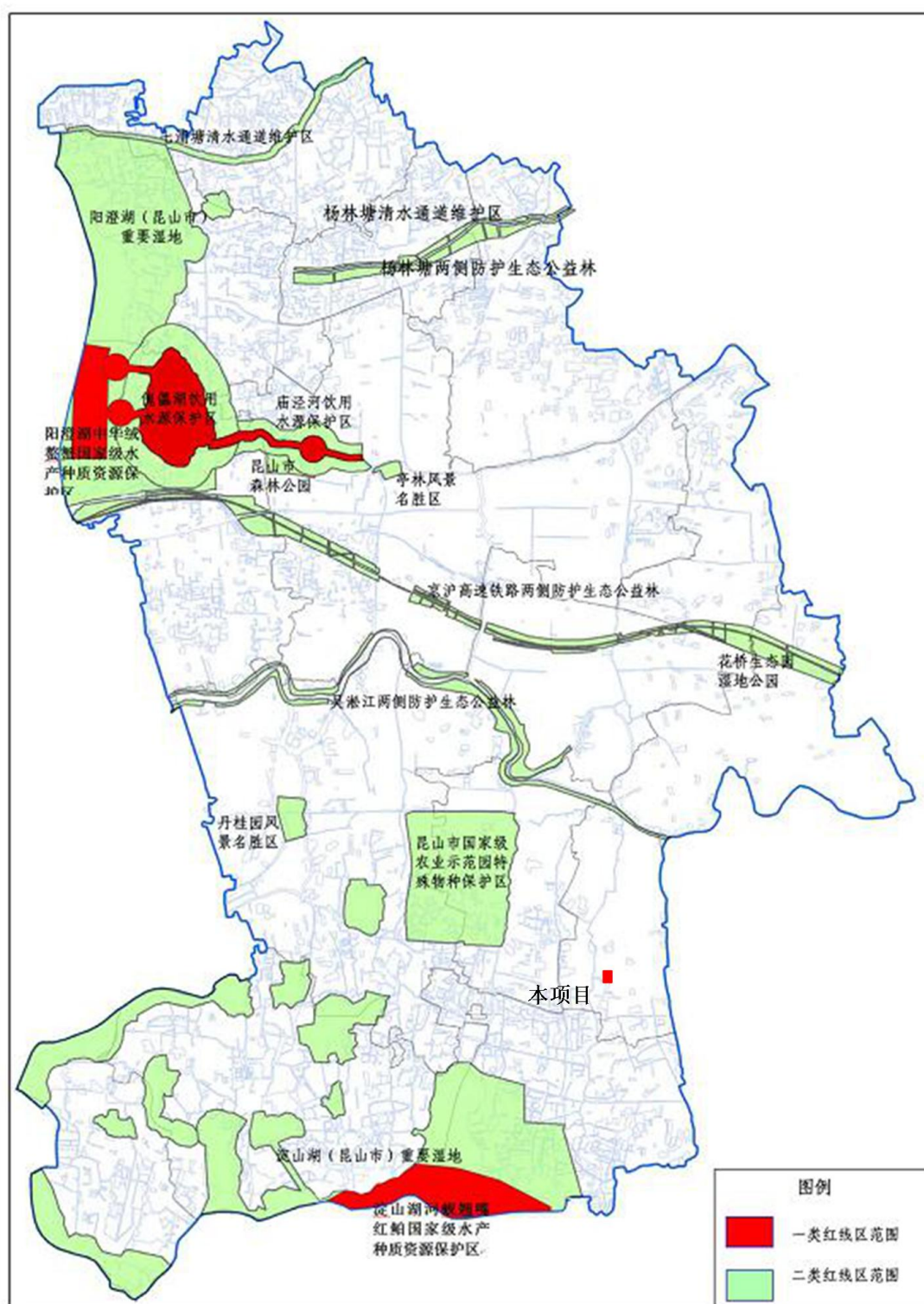
附图 2 周边 500 米范围环境示意图



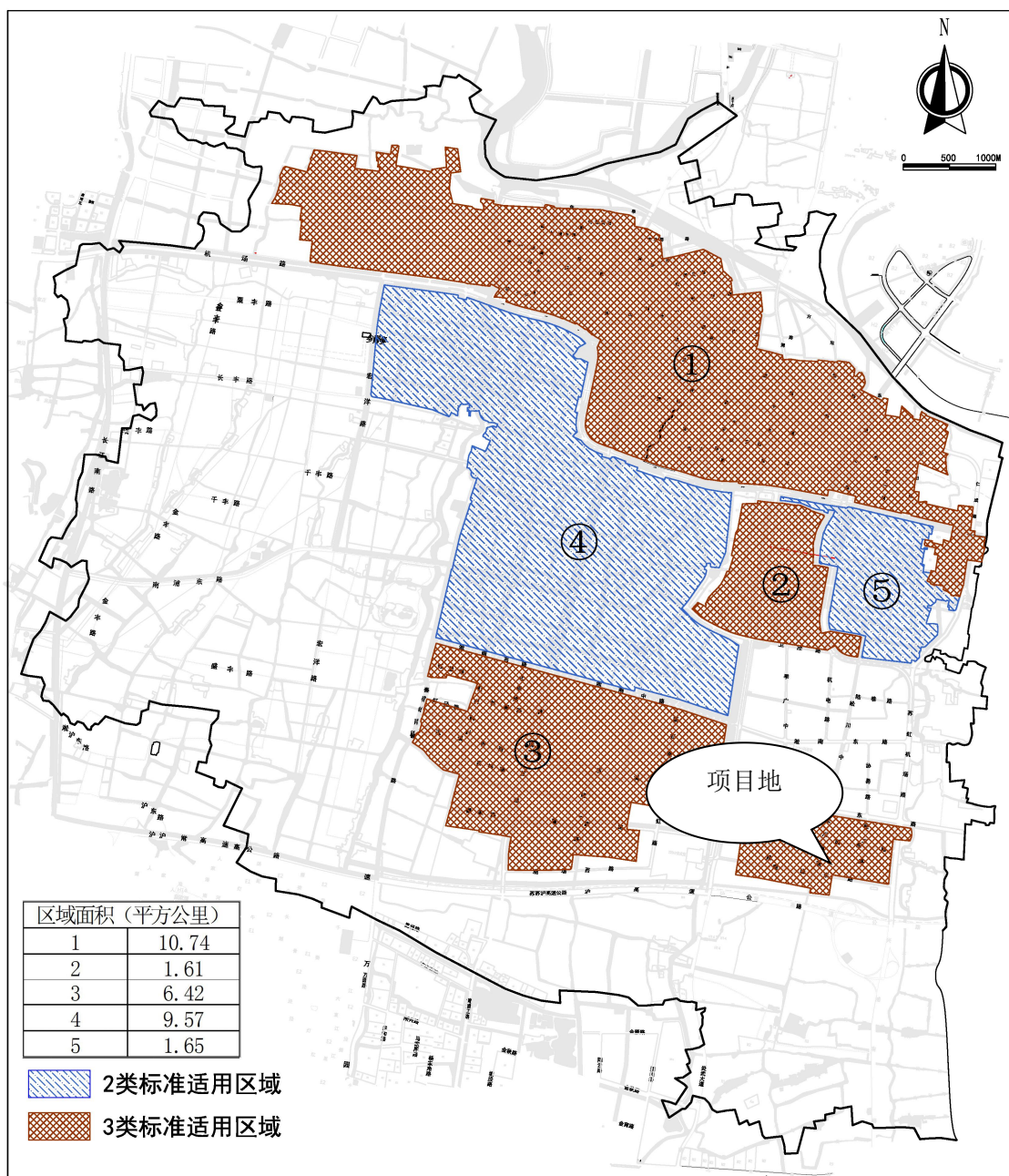
附图 3 车间平面布置图



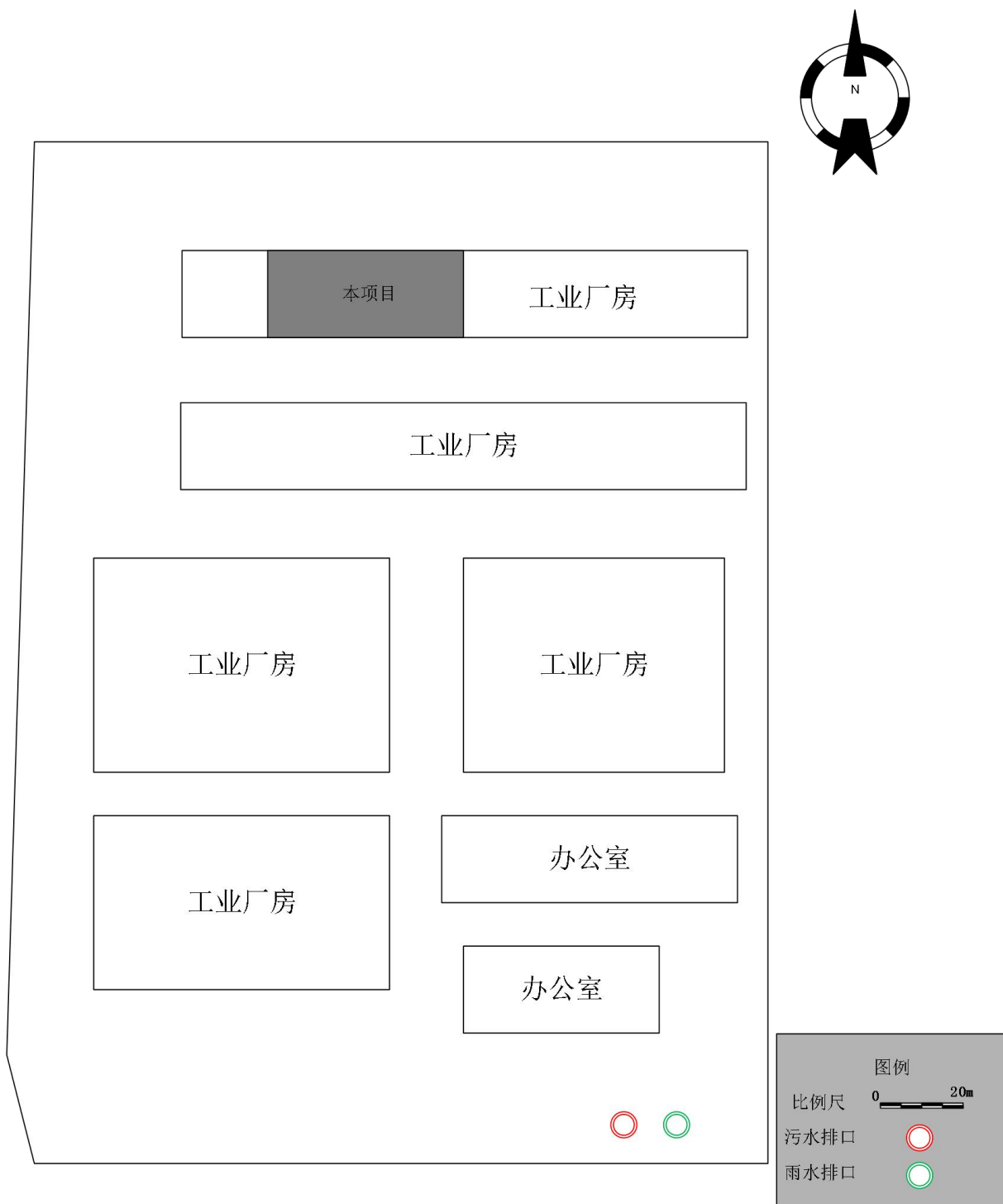
附图 4 昆山市 F04 规划编制单元控制性详细规划图



附图 5 昆山市生态红线规划图



附图 6 声环境功能区图



附图 7 项目厂区平面布置图