

### EC CONDITIONS COMPLIANCE STATUS

Ref: Order No. SEIAA/TN/EC/5(f)/005/f-117/2009 dt. 09.07.09

Sub: Enhancement in Production Capacity - Reg.

S.No.	EC Conditions	Compliance Status - For the period October 2011 to March 2012.
01.	"Consent for Establishment" shall be obtained from the Tamil Nadu Pollution Control Board and a copy shall be furnished to the SEIAA, Tamil Nadu before taking up of any construction activity at the site.	CTE / CTO obtained from TNPCB vide their Water Act Consent order: 22034 dt.18.11.2009. Proceeding No.T11/TNPCB/CHEM/F-37/EXP/RL/CUD/W/09 dt.18.11.2009. Air Act Consent Order: 18073 dt.18.11.2009. Proceeding No.T11/TNPCB/CHEM/F-37/RL/EXP/CUD/A/09 dt.18.11.2009.  Consent renewal obtained for both up to 31 <sup>st</sup> March 2013.
02.	Domestic effluent and trade effluent generated from the unit shall be treated in the combined effluent treatment plant consisting of equalization tank, settling tank, buffer tank, nutrient addition tank, aeration tank, clarifier, settling tank - 2 Nos, WTP/Cooling tower effluent collection tank, sludge drying beds, pressure sand filter and activated carbon filters and the treated effluent shall satisfy the standards prescribed by TNPCB. The treated effluent shall be disposed through the marine out fall of CUSECS as committed.	Domestic effluent and trade effluent generated from the unit are treated in the combined effluent treatment plant consisting of equalization tank, settling tank, buffer tank, nutrient addition tank, aeration tank, clarifier, settling tank -2 Nos, WTP/Cooling tower effluent collection tank, sludge drying beds, pressure sand filter and activated carbon filters and the treated effluent are thereby satisfying the standards prescribed by TNPCB and the consent conditions are complied with. Our unit is a Zero Liquid Discharge unit.
03.	The water requirement shall not exceed 695 KLD which shall be met from SIPCOT supply.	The water consumption has not exceeded 695 KLD and it is entirely met from SIPCOT supply only, thereby complied with.

04.	Emergency or accidental process emissions & the off gas from the process vents shall be scrubbed. The scrubbing liquid shall be sent to ETP for treatment.	Emergency or accidental process emissions & the off gas from the process vents are scrubbed. The scrubbing liquid is recycled back to process for reuse thereby we are Complying with the conditions.
05.	The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemical Rules 1989, as amended in 2000 and the Public Liability Insurance Act for handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives must be obtained before commissioning of the project. Requisite On-site Disaster Management Plan have to be prepared and implemented.	<p>We are complying with the provisions made in Manufacture, Storage and Import of Hazardous Chemical Rules 1989, as amended in 2000 and the Public Liability Insurance Act for handling of hazardous chemicals etc.</p> <ol style="list-style-type: none"> <li>1. Public liability insurance Policy No.4007/71177516/00/000 valid up to 31.03.2013.</li> <li>2. All necessary approvals from the Chief Controller of Explosives have been obtained.</li> <li>3. Onsite disaster Management plan has been implemented.</li> </ol>
06.	The project authorities shall provide adequate funds both recurring and non-recurring to implement the Environmental Management Measures stipulated by the SEIAA along with the implementation schedule for all the conditions stipulated herein. The funds so provided should not be diverted for any other purposes.	<p>Adequate funds both recurring and non-recurring to implement the Environmental Management Measures stipulated by the SEIAA are provided. Funds are not diverted for any other purpose.</p> <p>All the proposals are implemented and the stipulated conditions are complied with.</p>

07.	A separate Cell with adequate technically competent staff should be appointed to operate the Environmental Control measures and which should report directly to the top Executive of the plant premises.	Separate cell for Environment management is available, which is reporting directly to head of the plant. Complied with.
08.	Regular Ambient Air Quality Monitoring shall be carried out for VOC and HC besides other parameters in ambient air around the Plant.	Ambient air quality monitoring is carried out by the in-house facility. TNPCB also monitors twice a year. VOC and HC analysis has been carried out by MOEF approved lab regularly. Complied with.
09.	Occupational health surveillance of workers shall be done on a regular basis and records maintained as per the Factories Act, 1948.	Occupational health surveillance of workers are being carried out on regular basis and records are maintained as per the Factories Act, 1948. Health records are being archived year wise and will be maintained for 10 years. Preventive measures like usage of appropriate PPEs, vapour exhaust systems and other engineering controls are done to prevent direct exposure to emissions and other hydrocarbons.
10.	Proper House keeping and adequate occupational health programme shall be taken up. Regular occupational health surveillance programme for the relevant diseases shall be carried out and the records shall be maintained properly for atleast 10 years. Sufficient preventive measures shall be adopted to avoid direct exposure to emissions and other hydrocarbons.	
11.	The proponent shall undertake periodical health monitoring of the workers with special reference to the impact on the respiratory and renal system and maintain the document and appropriate monitoring gadget to be deployed to monitor VOC.	A comprehensive medical check-up with special focus on respiratory and renal system is being carried out on yearly basis and records are maintained. Monitoring gadgets like online VOC analyser and portable VOC analyser are deployed to monitor VOC. Complied with.

12.	The overall noise levels in and around the plant area shall be kept well within the standards prescribed by the TNPCB by providing noise control measures on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Ambient noise level monitoring is carried out by the in-house facility. TNPCB also monitors twice a year. Overall noise levels in and around the plant area are kept well within the standards prescribed by the TNPCB by providing noise control measures on all sources of noise generation. Complied with.  The safety valve outlets, steam vents and blowers are fitted with silencers. The DG set is housed in an acoustic enclosure.
13.	HCl, HBr and vapour emissions from the reactors / process vents shall be provided with suitable scrubbers and condensers. Scrubber efficiency shall be minimum 99%.	We do not use HBr in our process. Process emissions & the off gas from the process vents are scrubbed. The scrubbing liquid is recycled back to process for reuse. Complied with. Scrubber efficiency is ensured at a minimum 99%. Evaluation of scrubber efficiency is done regularly and sample evaluation is done for the month of April 2012.
14.	Regular monitoring of VOC and HC in the Work Zone Area in the Plant shall be carried out and data be submitted to SEIAA / TNPCB. Quarterly monitoring of fugitive emissions shall be carried out as per the Guidelines of CPCB.	Regular monitoring of VOC in the Work Zone Area in the Plant is carried out and the data is uplinked online to TNPCB. Quarterly monitoring of fugitive emissions are carried out as per the Guidelines of CPCB. Complied with.
15.	The Company shall harvest surface as well as rainwater from the rooftops of the buildings in the project and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Surface as well as rainwater from the rooftops of the buildings in the project and storm water drains are collected and the ground water is recharged through Rain water collection and harvesting system. Complied with.

16.	The proponent shall furnish an undertaking that they will abide by the conditions / recommendations mentioned in the EIA/ RA report furnished by them.	We are abiding by the conditions / recommendations mentioned in the EIA/ RA report.
17.	Green belt shall be developed to mitigate the effect of fugitive emissions all around the plant in a minimum 30% plant area in consultation with the District Forest Officer (DFO) as per CPCB guidelines.	Green belt is developed to mitigate the effect of fugitive emissions all around the plant > 30% plant area. Complied with.
18.	Hazardous Solid Waste from process (ETP sludge & spent carbon) shall be sent to the Common Sipcot Industrial Complex, TSDF, and Gummidipoondi. Handling and disposal of Hazardous waste should comply with TNPCB norms.	Hazardous Solid Waste from process (ETP sludge & spent carbon) are being sent to the Tamilnadu waste management association (TSDF), at Gummidipoondi. Handling and disposal of Hazardous waste are complied with TNPCB norms. Complied with.
19.	Stringent odour control measures should be implemented to prevent totally odour nuisance totally to the neighbourhood population and industrial units in a complete and adequate manner.	Stringent odour control measures are implemented to prevent totally odour nuisance to neighbourhood population and industrial units in a complete and adequate manner. Storage tank vents are fitted with vent balancing and vapour collection system to eliminate emission. Complied with.
20.	It is mandatory for the project proponent to furnish to the SEIAA. Half yearly compliance report in hard and soft copies on 1 <sup>st</sup> June and 1 <sup>st</sup> December in the prior Environmental Clearance.	Half yearly reports are submitted. Complied with.
21.	The unit has to continue to monitor their new product with appropriate gadgets.	No new product is proposed for manufacturing.

**GENERAL CONDITIONS COMPLIANCE STATUS**

S.No.	General Conditions	Compliance Status
01	The Environmental Clearance does not absolve the applicant / proponent of his obligation / requirement to obtain other statutory and administrative clearance from the concerned statutory and administrative authorities.	We have obtained statutory and administrative clearance from TNPCB.
02.	"Consent for Establishment" shall be obtained from the Tamil Nadu Pollution Control Board and a copy shall be furnished to the SEIAA. Tamil Nadu before taking up of any construction activity at the site.	<p>CTE / CTO obtained from TNPCB vide their Water Act Consent order: 22034 dt.18.11.2009. Proceeding No.T11/TNPCB/CHEM/F-37/EXP/RL/CUD/W/09 dt.18.11.2009. Air Act Consent Order: 18073 dt.18.11.2009. Proceeding No.T11/TNPCB/CHEM/F-37/RL/EXP/CUD/A/09 dt.18.11.2009.</p> <p>Consent renewal obtained for both up to 31<sup>st</sup> March 2013. Complied with.</p>
03.	No further expansion or modifications in the plant shall be carried out without prior approval of the SEIAA. In case of deviations or alterations in the project proposal from those submitted for clearance, a fresh reference shall be made to the SEIAA to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	<p>No further expansion or modifications in the plant has been carried out without prior approval of the SEIAA.</p> <p>Complied with.</p>
04.	Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per the Factories Act, 1948.	<p>Occupational health surveillance of workers are being carried out on regular basis and records are maintained. Complied with and records maintained as per the Factories Act, 1948.</p> <p>Complied with.</p>

05.	Usage of Personal Protective Equipments (PPEs) by all employees / workers shall be ensured.	Usage of Personal Protective Equipments (PPEs) by all employees / workers are ensured. Complied with.
06.	The project proponent shall also comply with all the environmental protection measures and safeguards proposed in the EMP report.	Compliance with all the environmental protection measures and safeguards are proposed in the EMP report.
07.	<p>The project proponent shall advertise in atleast two local newspapers widely circulated in the region, one of which shall be in the vernacular language informing the public that</p> <p>i. The project has been accorded Environmental Clearance.</p> <p>ii. Copies of Clearance letters are available with the Tamil Nadu Pollution Control Board.</p> <p>iii. Environmental Clearance may also be seen on the website of the SEIAA.</p> <p>The advertisement should be issued within 7 days from the date of issue of the clearance letter and a copy of the same shall be forwarded to the SEIAA. The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.</p>	<p>We have advertised in two local newspapers (Dinamani &amp; The Hindu ) which are widely circulated in the region, one of which in the vernacular language (in Dinamani )informing the public that</p> <p>i. The project has been accorded Environmental Clearance.</p> <p>ii. Copies of Clearance letters are available with the Tamil Nadu Pollution Control Board.</p> <p>Complied with.</p>
08.	The SEIAA reserves the right to stipulate additional conditions , if found necessary. The company in a time bound manner will implement these conditions.	
09.	The above condition will be enforced interalia under the provision of the water (Prevention and Control of Pollution ) Act 1974, Air (Prevention and Control of Pollution ) Act 1981, The Environment Protection Act 1986, Hazardous waste ( Management , Handling and Transboundary movement ) Rules 2008 and the Public liability insurance act 1991 along with their amendments and rules.	We will implement activities to ensure compliance when asked for.

10.	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office of MoEF, Bengaluru, the Zonal Office of CPCB, Bengaluru and the TNPCB. This shall also be put on the website of the Company by the proponent.	Six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e-mail) are submitted to the Regional Office of MoEF, Bengaluru, and the TNPCB. Complied with.
11.	The Environmental Statement for each financial year ending 31 <sup>st</sup> March in Form - V as is mandated has to be submitted by the project proponent to the Tamil Nadu Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and shall also be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the Regional Office of MoEF, Bengaluru by e-mail.	The Environmental Statement for the financial year ending 31 <sup>st</sup> March in Form - V has been submitted for the year 2011-12 to the Tamil Nadu Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently. The status of compliance of EC conditions and Form V was sent to the Regional Office of MoEF, Bengaluru. Complied with.
12.	The proponent shall upload the status of compliance of the stipulated EC Conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, Bengaluru, the Zonal Office of CPCB, Bengaluru, and the TNPCB. The criteria pollutant levels namely; SPM, RSPM, SO <sub>2</sub> , NO <sub>x</sub> (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	The status of compliance of the stipulated EC Conditions are sent to the Regional Office of MoEF, Bengaluru and the TNPCB. The criteria pollutant levels namely; SPM, RSPM, SO <sub>2</sub> , NO <sub>x</sub> (ambient levels as well as stack emissions) indicated for the project are monitored and displayed in scrolling board near the main gate of the company in the public domain. Complied with.
13.	A copy of the clearance letter shall be sent by the proponent to the Commissioner, Cuddalore Panchayat union and the local NGO ,if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website of the company by the proponent.	A copy of the clearance letter was sent to the Commissioner, Cuddalore Panchayat union.