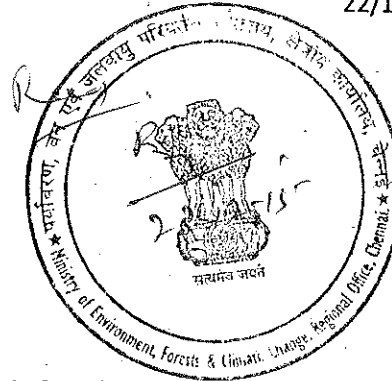


22/12/2015

To,

The Additional Principle Chief Conservator of Forests  
Ministry of Environment and Forests, Climate Change  
1<sup>st</sup> and 11<sup>th</sup> Floor, Handloom Export Promotion Council  
34, Cathedral Garden Road, Nungambakkam  
Chennai -600034



Sir,

Sub: Submission of Compliance Report for period of April 2015 – September 2015 – and Request for Environmental Clearance Compliance certification - Momentive Performance Materials India Private Limited, Oragadam– Regd.

Ref: EC issued vide MoEF Letter No. J-11011/518/2011-IA,II(I) dt. 07.12.2012

With reference to the above, Environmental Clearance has been accorded for the expansion of multi-product speciality silicones product plant at B-3, SIPCOT Industrial Estate, Oragadam, Sriperumbudur, Kanchipuram District, Tamil Nadu. Our project is implemented and operational.

In compliance to general condition XIV of above mentioned EC, we hereby enclosed the EC Compliance report for a period of April 2015 – September 2015 for your kind ready reference and records.

Meanwhile, we have proposed to further expand our silicone derivatives production capacity in our site. For the reason, now we are in the process of applying for Environmental Clearance to SEIAA, Tamilnadu for increasing the production capacity as per the conditions stipulated in EIA notification, 2006.

Further to inspection of our site on 15.10.2015 by Director, MoEF Regional Office, Chennai, We request your good office to issue the EC compliance certificate at the earliest to enable us to process our EC application.

Thanking you.

Yours sincerely,

For Momentive Performance Material India (P) Limited,

  
Authorized Signatory

B. Balaji

GM – Operations &amp; Supply Chain

b.balaji@momentive.com

Mobile No. 95000 33561

Encl: EC Compliance Statement and it's Annexures

**Momentive Performance Materials (India) Pvt. Ltd**  
**Compliance Status of Environmental Clearance Conditions**  
**April 2015 – September 2015**

Status of the Project : Operational & applied for EC for expansion		
S. No	CONDITIONS	COMPLIANCE
<b>EC CONDITIONS</b>		
<b>SPECIFIC CONDITIONS</b>		
1	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended time to time shall be followed by the unit.	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended time to time is being followed by the unit. The monitoring reports for the month of April 2015 to September 2015 are enclosed in <b>Annexure I</b> . Condition complied
2	Compliance to all the specific and general conditions mentioned in the existing environmental clearance letter no. J-11011/603/2007-IAII (I) dated 1 <sup>st</sup> April, 2008 shall be ensured.	Compliance to all the specific and general conditions mentioned in the existing environmental clearance letter no. J-11011/603/2007-IAII (I) dated 1 <sup>st</sup> April, 2008 are complied.
3	Stack of adequate height shall be provided to the FO fired boiler to disperse gaseous emissions. Boiler shall be provided with the automatic modulation control systems to ensure right air to fuel ratio to reduce the emission.	No FO is being used. We are using HSD for boiler and to that stack height of 30 m are provided to disperse gaseous emissions. The photograph was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015. Boiler is provided with the automatic modulation control systems to ensure right air to fuel ratio to reduce the emission.
4	Adequate scrubbing arrangement shall be provided to process stack to control process emissions. The scrubbing media shall be sent to effluent treatment plant (ETP) for treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. At no time, the emission levels shall go beyond the prescribed standards.	Scrubbing arrangements (Off Gas System) are provided to process stack to control process emissions. The waste water from scrubbing media is treated through effluent treatment plant (ETP). Efficiency of scrubber is monitored regularly and the monitoring reports are enclosed in <b>Annexure I</b> .
5	Ambient air quality data shall be collected as per NAAQES standards notified by the Ministry vide G.S.R. No. 826(E) dated 16th September, 2009. The levels of PM10, SO2, NOX, VOC and CO shall be monitored in the	Ambient air quality is monitored through external lab as per NAAQS standards. The monitored levels of PM10, SO2, NOX, VOC and CO in the ambient air and emissions from the stacks are displayed at main gate of the company.

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	<p>The levels of PM10, SO2, NOX, VOC and CO shall be monitored in the ambient air and emissions from the stacks and displayed at a convenient location near the main gate of the company and at important public places. The company shall upload the results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and the Tamil Nadu Pollution Control Board (TNPCB).</p>	<p>displayed at main gate of the company.</p> <p>Regular monitoring reports are submitted every month to the TNPCB and once in every Six months to Regional office of MOEF at Chennai.</p>
6	<p>In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling &amp; conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits stipulated by the TNPCB.</p>	<p>Necessary control measures for checking fugitive emissions from all the vulnerable sources are provided in the plant.</p> <p>No dust evolved in our loading and unloading area.</p> <p>Fugitive emissions in the work zone environment, product, raw materials storage area etc. are regularly monitored and it is in compliance with TNPCB Standards. (Reports enclosed in <b>Annexure I</b>). Condition complied.</p>
7	<p>For further control of fugitive emissions, following steps shall be followed:</p> <p>a. Closed handling system shall be provided for chemicals.</p> <p>b. Reflux condenser shall be provided over reactor.</p>	<p>The specific measures are in place to control of fugitive emissions, such as</p> <p>a. Closed handling system provided for chemicals. The photograph of the same was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015.</p> <p>b. Reflux condenser provided over reactor.</p>

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	<p>c. System of leak detection and repair of pump/pipeline based on preventive maintenance.</p> <p>d. The acids shall be taken from storage tanks to reactors through closed pipeline. Storage tanks shall be vented through trap receiver and condenser operated on chilled water.</p> <p>e. Cathodic protection shall be provided to the underground solvent storage tanks.</p>	<p>c. Preventive maintenance system for leak detection and repair of pump/pipeline in place.</p> <p>d. No acids are used in our site.</p> <p>e. No underground storage at our site.</p>
8	<p>The gaseous emissions from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.</p>	<p>2 Nos. of 700 KVA DG sets are provided with proper acoustic enclosures to reduce noise pollution while operation with a stack height of 15 m each. A photograph of the DG set &amp; Stack was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015.</p>
9	<p>Total fresh water requirement from SIPCOT water supply shall not exceed 231 m<sup>3</sup>/day and prior permission shall be obtained from the concerned Authority. No ground water should be used. Copy of permission from the CGWA/SGWA shall be submitted to the Ministry's Regional Office.</p>	<p>Our project requirement will not exceed 231 m<sup>3</sup>/day of fresh water which is obtained from SIPCOT. The agreement with SIPCOT was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015. No ground water is being used. Condition complied.</p>
10	<p>Trade effluent shall be treated in effluent treatment plant (ETP) followed by reverse osmosis (RO). Treated effluent shall be recycled /reused in the process. RO rejects shall be evaporated in multiple effect evaporators (MEE). Treated water shall be recycled / reused within factory premises. Sewage shall be treated in STP.</p>	<p>We are operating ETP with reverse osmosis and the treated water is recycled to process. RO reject is evaporated in multiple effect evaporators as ZLD concept. Sewage is treated in STP and the treated sewage water is reused for our gardening purposes.</p> <p>The Photographs and adequacy report for STP &amp; ETP was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015. Condition complied.</p>
11	<p>No effluent shall be discharged outside the factory premises and 'Zero'</p>	<p>Our ETP is based on ZLD concept hence no liquid is discharged outside our factory premises.</p>

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	Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	
17	<p>The company shall undertake following waste minimization measures :</p> <p>a. Metering and control of quantities of active ingredients to minimize waste.</p> <p>b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.</p> <p>c. Use of automated filling to minimize spillage.</p> <p>d. Use of Close Feed system into batch reactors.</p> <p>e. Venting equipment through vapour recovery system.</p> <p>f. Use of high pressure hoses for equipment clearing to reduce wastewater generation.</p>	<p>We have taken action to minimize waste as prescribed and a separate team is appointed for waste minimization project.</p> <p>a. Raw materials consumption is reduced by process optimization.</p> <p>b. By-products are being reused in the process.</p> <p>c. Filling process is fully automated.</p> <p>d. Closed feed system is used in the batch reactors.</p> <p>e. High pressure hoses are being used for equipment clearing to reduce waste water generation.</p>
18	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Firefighting system shall be as per the OISD 117 norms.	We have made arrangements for protection of possible fire hazards during manufacturing process in material handling. Fire license obtained from Tamil Nadu Fire & Rescue Service was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015. Condition Complied.
19	The company shall comply with the recommendations made in the EIA/EMP/Risk assessment report. Risk assessment shall be included in the safety Manual.	We have complied with the recommendation in EMP and risk assessment as stipulated in EIA report.
20	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be	Training is being imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees are undertaken on regular basis. Training to all employees on handling of chemicals is being imparted. Occupational health surveillance of the workers is done on a regular basis and records maintained

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	imparted. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	as per the Factories Act. Photographs of regular training events conducted was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015.
21	As proposed, green belt shall be developed in 4.98 acres out of total land 15.10 acres. Selection of plant species shall be as per the CPCB guidelines.	The green belt is maintained in the area of 4.98 acres earmarked in our plant premises. Plant species grown are as per CPCB guidelines and The photographs & list of plant species was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015.
22	Provision shall be made for the housing for the construction Labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	Conditions were complied.
<b>GENERAL CONDITIONS</b>		
1	The project authorities shall strictly adhere to the stipulations made by the T.N. Pollution Control Board.	We have strictly adhered to the conditions as stipulated by TNPCB.
2	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	No further expansion or modifications in the plant will be carried out without prior approval of the Ministry of Environment and Forests. Now we have proposed to further expand our Silicone derivatives production capacity in our site. For the reason, now we are in the process of applying for Environmental Clearance to SEIAA, Tamilnadu due to the increase in the production capacity as per the conditions stipulated in EIA notification, 2006. Also, we request the earlier EC Compliance certificate from MoEF Regional Office. Condition Complied.
3	The locations of ambient air quality monitoring stations shall be decided in	Based on TNPCB direction, we have 6 Ambient air quality monitoring sampling points covering all

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	consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one stations is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	boundaries of the factory premises corresponding to the predominant wind direction. Condition complied.
4	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Noise prone area such as DG sets are covered with acoustic enclosures and once in a month noise monitoring around the plant is carried out by an external approved lab the results of which are submitted to TNPCB on monthly basis. The results are enclosed in <b>Annexure I</b> . Conditions complied.
5	The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	We are harvesting rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and using the same water for the process activities of the project to conserve fresh water. The photograph of the rainwater and storm water drain was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015.
6	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Training is being imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees are undertaken on regular basis. Training to all employees on handling of chemicals is being imparted. Photographs of regular training events conducted was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015.
7	Usage of Personnel Protection Equipment's (PPEs) by all employees/workers shall be ensured.	Necessary PPEs are provided to all employees in our plant and are encouraged to use PPE at all times through management program to ensure PPEs adherence and effectiveness.

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8	The company shall also comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.	We have complied with all environmental protection measures based on EIA/EMP recommendations for environmental management and risk mitigation.
9	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administration.	We have undertaken measures for improving the socio-economic conditions of the surrounding area. CSR activities are undertaken by involving local villages and administration. Photographs of some of our CSR activities was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015.
10	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	We have undertaken eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment. Photographs of some of our community welfare activities was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015.
11	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	Condition Complied. The Environmental Management Cell details was submitted along with EC compliance statement to MoEF Regional Office on 07/10/2015.
12	The company shall earmark sufficient funds toward capital cost and recurring cost/annum to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted	We have earmarked sufficient funds toward capital cost and recurring cost/annum to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.

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	for any other purpose.	
13	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parisad/Municipal Corporation, Urban local Body and the local NGO, if any, from who suggestions/representations, if any, were received while processing the proposal.	A copy of the clearance letter was sent to y the project proponent to Vaipur Panchayat. We have complied with the stipulated condition.
14	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the T.N. Pollution Control Board. A copy of Environmental Clearance and six monthly compliance status reports shall be posted on the website of the company.	We have submitted environmental compliance statement to MoEF Regional Office, Chennai and monthly monitoring reports are being submitted to TNPCB regularly. The submitted copies of EC compliance report was submitted along with EC compliance statement to MoEF Regional Office, Chennai on 07/10/2015.
15	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF by e-mail.	Condition Complied. A copy of recently submitted Form-V is enclosed as <b>Annexure II</b> .
16	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be	We have informed the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at <a href="http://envfor.nic.in">http://envfor.nic.in</a> . This also advertised within

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	seen at Website of the Ministry at <a href="http://envfor.nic.in">http://envfor.nic.in</a> . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	seven days from the date of issue of the clearance letter, in two local newspapers that are widely circulated in the region of which one in Tamil and a copy of the same was forwarded to the concerned Regional Office of Ministry. Condition Complied.
17	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	We have informed the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project. We have adhered to the stipulated condition.