

To,

The Additional Principle Chief Conservator of Forests
Ministry of Environment and Forests, Climate Change
Ist and IInd 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-11011/603/2007-IA,II(I) dt. 01.04.2008

With reference to the above, Environmental Clearance has been accorded for the project of
multi-product specialty 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 XI 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.

Also we have submitted compliance report for EC issued vide MoEF Letter No. J –
11011/518/2011 – IA, II(I) dt. 07.12.2012 for the period of April 2015 – September 2015 on
22/12/2015.

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 & 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

F.No: J-11011/603/2007-IA II(I) Dated 1st April 2008

For the Period - April 2015 – September 2015

S.No	Conditions	Compliance																														
I	<p>This has reference to your letter no nill dated 11th June , 2007 on the above subject along with form I , pre-feasibility report ,EIA/EMP and subsequent communications vide letter dated 12th October 2007 and 1st November , 2007.</p>	Noted.																														
II	<p>The ministry has examined the proposal and it is noted that the proposal involves manufacturing of multi - product specialty silicon plant at B-3,SIPCOT Industrial Estate orangadam , sriperumpudur, Kancheepuram, TamilNadu .The unit will be located in notified SIPCOT industrial area.Total project area is 15.10 acres Total coast of the project is RS 88.60 Crores.Following will be manufactured:</p> <table border="1"> <thead> <tr> <th>S.NO</th> <th>PRODUCT</th> <th>QUANTITY(TPM)</th> </tr> </thead> <tbody> <tr> <td colspan="3">A.MAIN PRODUCTS</td> </tr> <tr> <td>1</td> <td>Aminofluids</td> <td>117</td> </tr> <tr> <td>2</td> <td>Abn ,Quats</td> <td>27</td> </tr> <tr> <td>3</td> <td>Emulsion</td> <td>78</td> </tr> <tr> <td>4</td> <td>UV hard coats</td> <td>4</td> </tr> </tbody> </table>	S.NO	PRODUCT	QUANTITY(TPM)	A.MAIN PRODUCTS			1	Aminofluids	117	2	Abn ,Quats	27	3	Emulsion	78	4	UV hard coats	4	<p>We have strictly adhered to the conditions as stipulated by MoEF.</p> <p>The Total area of the plot is 15.10 acres. The allotment letter is enclosed in Annexure I.</p> <p>The total cost of the project is 88.60 cores. The latest balance sheet is enclosed in Annexure II.</p> <p>We are manufactured the following products during April – September 2015. The production details enclosed in Annexure III.</p> <table border="1"> <thead> <tr> <th>S.NO</th> <th>PRODUCT</th> <th>Quantity Permitted (MTPM)</th> </tr> </thead> <tbody> <tr> <td colspan="3">A.MAIN PRODUCTS</td> </tr> <tr> <td>1</td> <td>Aminofluids</td> <td>117</td> </tr> <tr> <td>2</td> <td>Abn ,Quats</td> <td>27</td> </tr> </tbody> </table>	S.NO	PRODUCT	Quantity Permitted (MTPM)	A.MAIN PRODUCTS			1	Aminofluids	117	2	Abn ,Quats	27
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	(UA/Personal blend)	Care	
	Intermediate Products		
1	Octa Methyl Cyclo Tetra Siloxane (OMCTS)/Poly Dimethyl Siloxane (PDMS)	150	35
2	HCR Gum	49	0
	Total	1104	

Boiler is provided with the automatic modulation control systems to ensure right air to fuel ratio to reduce the emission Stack height of 30 m is provided to the HSD fired boiler to disperse gaseous emissions. The photograph is enclosed in **Annexure IV**.

Our project requirement will not exceed 231 m³/day of fresh water which is obtained from SIPCOT. The agreement with SIPCOT is enclosed in **Annexure V**. No ground water is used.

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 is reused for our gardening purposes. The Adequacy report & Photographs for STP & ETP is enclosed in **Annexure VI**.

We are disposing silicone residue, MEE salt and ETP sludge to the TSDF. The TSDF agreement is enclosed in **Annexure VII**. Spent solvent is being disposed to authorized recyclers. Agreement copy of the same is

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	The condition shall be monitored by the Regional office of this ministry located at Bangalore.	
7.0	The ministry may revoke or suspend the clearance if implementation of any of the above condition is not satisfactory.	Noted.
8.0	Any other conditions or alteration in the above conditions shall have to be implemented by the project authorities in a time bound manner.	We have strictly adhered to the conditions as stipulated.
9.0	Any appeal against this environmental clearance shall lie with national Environment appellate Authority, if preferred within a period of 30 days as prescribed under section 11 of the National Environment Appellate Act 1997.	Noted.
10.0	The above conditions shall be enforced inter - alia under the provision of the water (prevention and control of pollution)Act,1981 the Environment (protection)Act,1986 and the public Liability Insurance Act,1991 along with their amendments and rules.	We have strictly adhered to the conditions as stipulated.

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5	Heat cured rubber(HCR)	250
6	Sealants-repacking	25
7	Urethane additive blends	83
B. Intermediate products		
1	Octa methyl cyclo tetra siloxane(D4)	150
2	HCR-Gum	183

3	Emulsion	78
4	UV hard coats	4
5	Heat cured rubber(HCR)	250
6	Sealants-repacking	25
7	Urethane additive blends	83
B. Intermediate products		
1	Octa methyl cyclo tetra siloxane(D4)	150
2	HCR-Gum	183

We are manufactured the following products during last year as per the EC 2012.

S.No	Products	Quantity Permitted (MTPM)	Quantity Produced (Average)
1	Silicon Fluids (Aminos/PDMS/)	141	37
2	A (B)n /Quatrz	78	32
3	Silicon Emulsion	156	87
4	Hard Coats	27	9
5	Silicon Polymer & Elastomers-(HCR/)	135	32
6	Silicon Sealant Repacking	125	22
7	Silicon Surfactants	243	218

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		enclosed in Annexure VIII.
IV	No public hearing/consultation is required due to location of the project in notified SIPCOT Industrial Estate.T.N.as per section (iii).stage (3),para(i) (b) of the EIA Notification 2006.	Noted
V	The ministry of environment and forest hereby accords environmental clearance to the above project under the EIA Notification 2006 subject to the compliance of the terms and conditions mentioned below.	Noted.
Specific Conditions		
1	The gaseous (SO ₂ , NO _x) and particulate matter emissions from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the particulate emissions from the cement plant shall exceed TNPCB limit. Stacks of appropriate height as per the CPCB guidelines shall be provided to control process emissions. Interlocking facility shall be provided in the pollution control equipment so that in the event of the pollution control equipment not working, the respective unit is shut down automatically. In the event of failure of pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.	Conditions complied. Emission monitoring is done on monthly basis as per the monitoring program stipulated and the results are found to be within the prescribed limits. A copy of the reports is enclosed in Annexure IX. Stacks of appropriate height as per the CPCB guidelines is provided to control process emissions

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2	<p>Venturi scrubbers shall be provided to control air emissions from both specialty and Elastomer plants. Two - Stage-cleaning system with stacks of adequate height shall be provided to control process emissions before discharging into the atmosphere. The flue gas and process emissions shall conform to the standards prescribed by the T.N. Pollution control board and reports submitted to the ministry of regional office at Bangalore, CPCB and TNPCB.</p>	<p>Instead of Venturi Scrubbers we provided advanced Packed bed counter flow water spray scrubber. The scrubbers are provided to control air emissions from both specialty and Elastomer plants. The emissions from the scrubbers are monitored on monthly basis and the results are found to be in compliance with the norms specified. A copy of the reports is enclosed in Annexure IX.</p>						
3	<p>One ambient air quality monitoring station shall be installed in downwind direction. Ambient air quality including ambient noise levels shall not exceed the standards stipulated under EPA or by the state authorities. Monitoring of ambient air quality and stack emissions shall be carried out regularly in consultation with TNPCB and report</p>	<p>The following process specific APC Measures have been installed:</p> <table border="1" data-bbox="710 100 949 1008"> <thead> <tr> <th>S.No</th> <th>Source</th> <th>APC Measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Off gas from Elastomer and specialty plants storage tank vents</td> <td>Packed bed counter flow water spray scrubber</td> </tr> </tbody> </table> <p>Process emissions are controlled by stacks provided at an elevation of 13 mts from the GL The copy of the reports for the last month is enclosed. The six monthly reports shall be sent to MoEF- Bangalore.</p>	S.No	Source	APC Measures	1	Off gas from Elastomer and specialty plants storage tank vents	Packed bed counter flow water spray scrubber
S.No	Source	APC Measures						
1	Off gas from Elastomer and specialty plants storage tank vents	Packed bed counter flow water spray scrubber						
<p>Conditions complied. We have tie up with an authorized laboratory to undertake the emission monitoring and ambient air quality survey, wherein the stack emission and waste water analysis are being done on monthly basis. The AAQ survey is done on all four locations [directions commensurate with the wind pattern] around the project boundary.</p>								

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	submitted to the TNPCB quarterly and to the ministry regional office at Bangalore half – yearly.	Regular monitoring reports are submitted every month to the TNPCB and once in every Six months to Regional office of MOEF.
4	All the transfer points shall be connected with the bag filters to avoid fugitive emissions and vents of suitable height shall be provided for dispersion of pollutants. Adequate arrangements such as water sprinkling, asphaltting of the road etc. shall be made to control fugitive emissions in the work place environment, product, raw material storage areas. Fugitive emissions including VOCs shall be regularly monitored in the work zone environment and report submitted to the ministry/s regional office at Bangalore, TNPCB and CPCB. The emissions shall conform to the limits imposed by TNPCB.	Conditions complied. All the process transfer points have been duly addressed with extraction hoods connected to an air pollution control device [Scrubber]. As far as the process area the entire zone is properly ventilated and air exhaust systems with vents of suitable height provided. The road / pathways and the areas around the project boundary is asphalted and addressed with water sprinklers so as to mitigate the dust propagation if at all arise. VOC's are regularly monitored, though the usage of solvents in our process is very less and specific to only selective products. Monitoring report submitted to the ministry's regional office at Chennai, TNPCB and CPCB. The emissions results within the limits prescribed by TNPCB.
5	The company shall undertake following waste minimization measures: <ul style="list-style-type: none"> • Metering of quantities of active ingredients to minimize waste. • Reuse of by- products from the process as raw materials or as raw material substitutes in other processes. • Maximizing recoveries. 	We undertake the measures as suggested to minimize the waste during the process activities. i) Measured quantity of solid handled & required quantity of liquid incidents handled through pipelines to minimize wastage.

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	<ul style="list-style-type: none"> • Use of automated material transfer system to minimize spillage. • Use of / close Feed/ system into batch reactors. 	<p>ii) No By- products from the process.</p> <p>iii) No By- products from the process.</p> <p>iv) Automated material transfer system available to minimize spillage.</p> <p>v) Close feed system into the batch reactor is in usage.</p>
6	<p>Total water requirement from SIPCOT water supply and effluent generation shall not exceed 231m³/ day and 67m³/ day respectively. Permission for the drawl of 231-m³/ day water shall be obtained from the concerned department. The process effluent shall be treated in the effluent treatment plant (ETP) to meet the TNPCB norms and used for green belt development. Reverse osmosis plant shall be installed to recycle and reuse the maximum waste water and reduce water consumption. No effluent will be discharged outside the premises and zero discharge will be adopted. Domestic effluent shall be treated in septic tank followed by soak pit.</p>	<p>Our project requirement will not exceed 231 m³/day of fresh water which is obtained from SIPCOT. The agreement with SIPCOT is enclosed in Annexure V. No ground water is used.</p> <p>We ensure that the quantity of effluent generation not exceed 67m³/ day as given. The effluent generated is treated in the ETP of capacity 70 KLD followed by two stage RO system and the treated water is reused in the process activities. Hence zero discharge concepts are compiled.</p> <p>The sewage shall be treated through STP of capacity 10 KLD and ensure to reuse the treated sewage for gardening within the premises</p>
7	<p>During transfer of materials spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains</p>	<p>Dikes are provided for all Bulk storage to contain leaks / spills, if at all. Proper drains has been provided for domestic waste and storm drains</p>
8	<p>As reflected in the EIA / EMP report, the solid waste in the form of organic residue shall be incinerated in the incinerator. ETP sludge shall be disposed of in the hazardous waste disposal facility of TNPCB.</p>	<p>Since TNPCB imposed restrictions on installation of incinerator and advised to join with the common facilitator no incinerator is installed for in house disposal of the solid waste generated out of the facility</p>

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	Waste oil shall be sold to the registered recyclers/ re-processors	production. The solid waste to be generated from the facility have been disposed through authorized facilitators along with ETP sludge after securing due authorization from TNPCB. Used oil generated from the unit stored in MS drums in kept separate shed and same will be sold to the registered recyclers/reprocesses. Contract facility document as attached.
9	Project authorities shall ensure valid membership to hazardous waste disposal facility of TNPCB all the time	We have already secured the membership and have also signed up with the authorized facilitator as identified by TNPCB. Disposal of Hazardous waste to the authorized facilitator is regularly done. A copy of agreement is as attached as Annexure VII .
10	The incinerator shall be installed as per the guidelines of CPCB to meet the standards / norms prescribed by the CPCB.	Since TNPCB imposed restrictions on installation of incinerator and advised to join with the common facilitator no incinerator is installed for in house disposal of the solid waste generated out of the facility production.
11	As proposed, green belt shall be developed in 4.5 acre out of total 15 acre to mitigate the effects of fugitive emissions all around the plant as per the Central Pollution Control Board guidelines.	The green belt is maintained in the area of 4.98 acres earmarked in our plant premises. The photographs and the list of plant species grown are as per CPCB guidelines and enclosed as Annexure X .

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General conditions

SNo	Conditions	Compliance
i	The project authority shall adhere to the stipulations made by T. N Pollution Control Board (TNPCB) and State Government	We have strictly adhered to the conditions as stipulated by TNPCB.
ii	No further expansion or modification of the plant shall be carried out without prior approval of this ministry.	Condition Complied. 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.
iii	The Company must harvest the rainwater from the rooftops 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.	Condition Complied. Implemented Rainwater harvest from the rooftops with percolation pits to recharge the ground water, A open reservoir of capacity 2023 KL storage is also constructed to collect the runoff and use it for various applications within the facility after due treatment. The photograph of the rainwater and storm water drain is enclosed in Annexure XI.
iv	The Company shall undertake eco-development measures including community welfare measures in the project area.	Condition Complied. Photographs of some of our CSR activities enclosed in Annexure XII.
v	The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing Noise control measures	Conditions complied. Noise prone area such as DG sets are covered with acoustic enclosures and once in a month noise monitoring around the

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	including acoustic hoods, Silencers, enclosures ect on all sources of Noise generation. The ambient noise levels shall conform to the standards prescribed under Environmental (Protection) Act, 1986 Rues, 1989 viz. 75 dBA (Day time and 70- dBA (Night time)	plant is carried out by an external approved lab the results of which are submitted to TNPCB on monthly basis. The results are within the limits as prescribed under Environmental (Protection) Act, 1986 Rues, 1989 viz. 75 dBA (Day time) and 70 dBA (Night time). The results are enclosed in Annexure IX .
vi	Proper Housekeeping and adequate Occupational Health programmes shall be taken up.	Condition Complied. Housekeeping is given top priority and frequently monitored the environment to ensure Housekeeping. Adequate Occupational Health programmes have been taken up.
Vii	A Separate environmental Management cell to carry out various management and monitoring functions shall be setup under the control of Senior Executive.	Condition Complied. The Environmental Management Cell details enclosed in Annexure XIII .
Viii	Occupational Health Surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Condition Complied. The Occupational Health surveillance of the workers done on regular basis and records maintained as per the Factories Act.
Ix	All recommendations made in the Corporate Responsibility for Environment Protection (CREP) for chemical plants shall be implemented.	Conditions Complied.
X	Adequate funds shall be allocated towards capital cost and recurring cost/annum for environmental pollution control measures and judiciously used to implement the conditions stipulated by the Ministry	Separate funds are earmarked for environment management/pollution control measures for implementation of MoEF conditions. Also, We are not be diverted this funds for any other purpose.

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	<p>of Environment and forest as well as the State Government. The funds so provided shall not be diverted for any other purpose.</p>	
xi	<p>The Regional office of this Ministry at Bangalore / CPCB/TNPCB shall monitor the stipulated conditions. A six monthly compliance report and the monitored data Along with statistical interpretation shall be substituted to them regularly.</p>	<p>We have submitted environmental compliance statement to MoEF Regional Office; Chennai and monthly monitoring reports are being submitted to TNPCB regularly.</p>
xii	<p>The project Authorities shall inform the Regional Office as well as Ministry, the date of Finance closure and final approval of the project by the concerned authorities and the date of commencing the land development work.</p>	<p>Condition complied. Informed the Regional Office, Bangalore.</p>
Xiii	<p>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 T N Pollution Control Board and may also be seen at Website of the Ministry of Environment and Forest at http://envfor.nic.in. This should be advertised within seven days from the date of issue of the clearance letter at least in tow local newspaper that are widely circulated in the region of which one shall be in the vernacular of the locality concerned and a copy of the same shall be forwarded to the Regional office at Bangalore.</p>	<p>Condition Complied. The copy of the newspaper advertisement is enclosed in Annexure XIV.</p>
6.0	<p>The ministry or any other competent authority may stipulate any further condition(s) on receiving reports from the project authorities.</p>	<p>Noted.</p>

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