

MOMENTIVE PERFORMANCE MATERIALS(I) PVT LTD.,
B-3, SIPCOT Industrial Growth Centre, Oragadam, Sriperumbudur Taluk

COMPLIANCE STATEMENT FOR ENVIRONMENTAL CLEARANCE

JAN - JUNE 2012

SI. NO	GENERAL CONDITION	STATUS
1	The project authorities shall strictly adhere to the stipulations made by the T.N. Pollution Control Board.	We have strictly adhered stipulations 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.	If any deviation or alteration in the project we will follow the MoEF direction .
3	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Based on SPCB direction, we have 4 AAQ stations which covered all boundaries of factory premises & ensured the predominant wind direction also.
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 covered with acoustic measures & once in a month engaged external approved lab for Noise monitoring around plant and results will be submitted to SPCB on monthly basis
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 have provided rainwater harvest pit to collect the rain water from roof tops of building and storm water drains for recharge of our ground water
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.	We are conducting Safety & health awareness training to all employees on daily/weekly/monthly basis. Pre employment & Periodical medical examination are conducted on regular intervals
7	Usage of Personnel Protection Equipments (PPEs) by all employees/ workers shall be ensured	We have separate management program for PPE's & ensured PPEs Adherence and effectiveness for all employees
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 all environmental protection measures based on EIA/EMP recommendation of environment management & 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 taken substantial measures for improving socio-economic conditions under CSR activities.
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 actively participated/sponsored an eco-developmental measures including community welfare measures
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.	We have full fledged environmental lab facility to monitor the parameters of ETP/STP

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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 for any other purpose.	We have allocated sufficient funds for environmental management & monitoring functions
13	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from who suggestions/ representations, if any, were received while processing the proposal.	complied with
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 report shall be posted on the website of the company.	Monthly reports submitted to SPCB before 9th of every month. Herewith we have attached the monthly report from Jan - Dec 2012. We will take initiative to posted our monthly report & EC clearance to our company web site.
15	The environmental statement for each financial year ending 31 st 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.	We have submitted environmental statement Form V for each financial year to SPCB & regional offices of MoEF
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 seen at Website of the Ministry at http://emf.or.gov.in . 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.	we have advertised our project expansion environmental clearance to the local/regional language news papers dated on 25/12/2012. Copies attached.
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.	complied with
18	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	complied with
19	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	complied with
20	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986 Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	complied with

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COMPLIANCE STATEMENT FOR SPECIFIC CONDITIONS

JAN - JUNE 2013

Sl. NO	SPECIFIC CONDITION	STATUS
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.	AS per MOEF notification for organic chemicals Industry GSR 608(E) dated 21st July 2010, we have monitored Effluent standards & Strom water. Not applicable for Emission standards for incinerator.
2	Compliance to all the specific and general conditions mentioned in the existing environmental clearance letter no. J-11011/603/2007-III (I) dated 1st April, 2008 shall be ensured.	We have complied all specific & general condition mentioned in the existing environmental clearance dated 1st april 2008
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.	complied with
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	We have provided wet scrubber arrangement in all process stacks to control process emission. The waste water from surubber unit connected to ETP
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, NOR, 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).	We have engaged external approved lab for AAQS/SM monitoring and results being submitted to SPCB by every month & Six month reports submitted to Regional MoEF periodically
6	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 & 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.	We have ensured there is no fugitive emission from our project
7	For further control of fugitive emissions, following steps shall be followed: a. Closed handling system shall be provided for chemicals. b. Reflux condenser shall be provided over reactor. c. System of leak detection and repair of pump/pipeline based on preventive maintenance. d. The acids shall be taken from storage tanks to reactors through closed pipelines. Storage tanks shall be vented through trap receiver and condenser operated on chilled water. e. Cathodic protection shall be provided to the underground solvent storage tanks.	We have ensured there is no fugitive emission from our project
8	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.	We have provided adequate height of DG stack as prescribed by CPCB.
9	Total fresh water requirement from SIPCOT water supply shall not exceed 231 m ³ /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.	We have ensured SIPCOT water supply not exceed 231 m ³ /day & special approval for ground water usage from water authorities.
10	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 evaporator (MEE). Treated water shall be recycled/reused within factory premises. Sewage shall be treated in STP.	We are operating ETP with reverse osmosis & its treated water recycled to process. RO reject is evaporated in multiple evaporator as ZLD concept. Sewage is treated in STP the treated sewage reuse for our gardening purposes.
11	No effluent shall be discharged outside the factory premises and 'Zero' discharge concept shall be adopted.	Our ETP is ZLD concept hence that no liquid discharge to outside of factory premises.

12	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	We have ensured to avoid process effluent/any waste water mix with storm water drain
13	All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	We have provided vent condensers with chilled circulation in solvent storage tank exhaust
14	As proposed, silicon residue, MEE salt and ETP sludge shall be sent to the TSDF. Spent catalyst/ resin and spent oil shall be sent to authorized recycler/processor.	We are giving silicon residue, MEE salt & ETP sludge to TSDF. Used oil is being disposed to PCB authorised recycler
15	The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date for management of Hazardous wastes and prior permission from TNPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. Measures shall be taken for fire fighting facilities in case of emergency.	We have obtained Hazardous waste authorization to dispose our Hazardous waste to TSDF as prescribed Hazardous waste Rules 2008
16	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All Transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	We have complied the rules and guidelines under manufacture, storage & Import of Hazardous chemicals rules 1989 & Motor vehicle act 1989
17	The company shall undertake following waste minimization measures: a. Metering and control of quantities of active ingredients to minimize waste. b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. c. Use of automated filling to minimize spillage. d. Use of Close Feed system into batch reactors. e. Venting equipment through vapour recovery system. f. Use of high pressure hoses for equipment cleaning to reduce wastewater generation.	We have taken action to minimise waste as prescribed & separate team formed for waste minimisation project.
18	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the OISD 117 norms.	We have complied for fire protection as per OISD 117 norms
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 the recommendation in EIA/EMP/Risk management
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 imparted. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	We are conducting Safety & health awareness training to all employees by daily/weekly/monthly. Preemployment & routine periodical medical examination are conducted regularly
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.	We have developed green belt as prescribed by CPCB guidelines
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.	complied with

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