

EC Compliance Statement for the Half-yearly period of January – June 2014

S. No.	CONDITIONS	COMPLIANCE
<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.	The emission standards are complied as prescribed by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and the related monitoring reports for the months December to May 2014 of our Unit are enclosed in Annexure I.
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.	Copy of the compliance statement for the EC dated 1 <sup>st</sup> April 2008 is enclosed in Annexure II.
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.	The stipulated conditions have been complied.
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.	Wet scrubber arrangements are provided in all process stacks to control process emission. The waste water from scrubbing media is treated through effluent treatment plant (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, 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).	Regular monitoring reports are submitted every month to the TNPCB and once in every Six months to Regional office of MOEF (Bengaluru).
6	In plant control measures for checking fugitive emissions from all the vulnerable	Fugitive emissions in the work zone environment, product, raw materials

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	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.	storage area etc. are regularly monitored and conformed to TNPCB Standards (Reports enclosed in Annexure I).
7	<p>For further control of fugitive emissions, following steps shall be followed:</p> <ul style="list-style-type: none"> <li>a. Closed handling system shall be provided for chemicals.</li> <li>b. Reflux condenser shall be provided over reactor.</li> <li>c. System of leak detection and repair of pump/pipeline based on preventive maintenance.</li> <li>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.</li> <li>e. Cathodic protection shall be provided to the underground solvent storage tanks.</li> </ul>	The specified measures are complied for control of fugitive emissions.
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 for the DG stacks as prescribed by CPCB.
9	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.	We have ensured that our project requirement will not exceed 231 m <sup>3</sup> /day of fresh water which is obtained from SIPCOT water supply. The SIPCOT agreement copy is enclosed in Annexure III.
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	We are operating ETP with reverse osmosis and the treated water is recycled to process. RO reject is evaporated in multiple effect evaporator as ZLD concept. Sewage is

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	shall be evaporated in multiple effect evaporators (MEE). Treated water shall be recycled/reused within factory premises. Sewage shall be treated in STP.	treated in STP and the treated sewage is reused for our gardening purposes.  The Adequacy report for STP and ETP is enclosed in Annexure IV.
11	No effluent shall be discharged outside the factory premises and 'Zero' discharge concept shall be adopted.	Our ETP is based on ZLD concept hence no liquid will be discharged outside our 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 the process effluent or any wastewater not mix with storm water drian.
13	All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	Solvent storage tanks are not available in our facility.
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/re-processor.	We are giving silicon residue, MEE salt and ETP sludge to the TSDF. The TSDF agreement is enclosed as Annexure V. Spent oil is being disposed to authorized recyclers. Agreement copy for the same is enclosed in Annexure VI.
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 firefighting facilities in case of emergency.	We have obtained Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008. Hazardous Waste Authorization is enclosed as Annexure VII.
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 and Import of Hazardous Chemicals (MSIHC) Rules, 1989 and the Motor Vehicle Act (MVA), 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	We have taken action to minimize waste as prescribed and a separate team is appointed for waste minimization project.

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	<p>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>	
18	<p>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.</p>	<p>We have complied for fire protection as per OISD 117 norms. Fire license obtained from Tamil Nadu Fire &amp; Rescue Service is enclosed as Annexure VIII.</p>
19	<p>The company shall comply with the recommendations made in the EIA/EMP/Risk assessment report. Risk assessment shall be included in the safety Manual.</p>	<p>We have complied with the recommendation in EMP and risk assessment as stipulated in EIA report. The risk assessment conduct is incorporated in our safety manual.</p>
20	<p>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.</p>	<p>All employees are provided necessary training in aspects of chemicals handling, health and safety on daily/weekly/monthly basis. Pre-employment &amp; routing periodical medical examinations are conducted regularly and records are maintained in our premises. Photographs of regular training events conducted are enclosed in Annexure IX.</p>
21	<p>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.</p>	<p>The green belt is maintained in the area of 4.98 acres earmarked in our plant premises. The list of plant species grown are as per CPCB guidelines and is enclosed as Annexure X.</p>
22	<p>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</p>	<p>Conditions were complied.</p>

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	the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	
<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.	If any deviation or alteration in the project we will follow the MoEF direction and necessary environmental protection measures will be in place should any further expansion or modifications are implemented.
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 stations is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Based on TNPCB direction, we have 4 Ambient air quality monitoring sampling points covering all boundaries of the factory premises corresponding to the predominant wind direction.
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 enclosures and once in a month engaged external approved lab for noise monitoring around the plant and results are submitted to TNPCB 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 rain water harvesting pit to collect the rain water from rooftops of building and storm water drains for recharging ground water.

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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.	All employees are provided necessary training in aspects of chemicals handling, health and safety on daily/weekly/monthly basis and workers are constantly under health surveillance through pre-employment & periodical medical examinations conducted on regular intervals. Photographs of regular training events conducted are enclosed in Annexure IX.
7	Usage of Personnel Protection Equipments (PPEs) by all employees/ workers shall be ensured.	We have separate management program to ensure 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 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 taken substantial measures and constantly involve in many programmes for improving socio-economic conditions in our local community under CSR activities. Photographs of some of our CSR activities are enclosed in Annexure XI.
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 eco-developmental measures including community welfare measures. Photographs of some of our community welfare activities are enclosed in Annexure XI.
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 set up an environmental laboratory within our unit for environmental management and monitoring functions. A separate Environmental Management Cell has been appointed whose details are enclosed as Annexure XII.
12	The company shall earmark sufficient funds toward capital cost and recurring cost/annum to implement the conditions stipulated by the Ministry of Environment	The details of the fund earmarked for environment management/ pollution control measures are enclosed in Annexure XIII.

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	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.	
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.	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 report shall be posted on the website of the company.	We have submitted environmental compliance statement to MoEF Regional Office, Bengaluru and monthly monitoring reports are being submitted to TNPCB regularly.
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.	The stipulated condition is complied. The environmental statement (Form-V) is being submitted to TNPCB and MoEF, Regional Office, Bengaluru every year. A copy of recently submitted Form-V is enclosed as <b>Annexure XV</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 seen at Website of the Ministry	The copy of the Environmental Clearance obtained as advertised in two local newspapers dated 25/12/2012 is enclosed as <b>Annexure XVI</b> and same was forwarded to MoEF, Bangalore/Chennai.

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	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.	
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 adhered to the stipulated condition.