

Date: 30th September 2015

COMPLIANCE STATUS TO THE CONDITIONS SPECIFIED IN THE LETTER GRANTING ENVIRONMENTAL CLEARANCE TO PRASOL CHEMICALS LIMITED FOR THE EXPANSION OF THEIR SYNTHETIC ORGANIC CHEMICALS MANUFACTURING FACILITY

| S. No. | Description | Compliance Status / Remarks |
|-------------------------------|--|--|
| A. SPECIFIC CONDITIONS | | |
| i | National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R.608 dated 21 st July, 2010 and amended time to time, shall be complied with by the Unit. | <i>The existing unit is already in compliance with the norms by National Emission Standards for Organic Chemicals Manufacturing and the proposed expansion will also comply with the same when in operation.</i> |
| ii | Scrubber shall be provided 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. Efficiency of scrubber shall be monitored regularly and maintained properly. | <i>Scrubber and Flare installed to control the process emissions. The emission levels will be within the prescribed limits.</i> |
| iii | Ambient air quality data shall be collected as per NAAEQS standards notified by the Ministry vide G.S.R. No. 826€ dated 16 th September, 2009. The levels of PM ₁₀ , PM _{2.5} , SO ₂ , NO _x , 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 Maharashtra Pollution Control Board (MPCB). | <i>The Ambient Air Quality data is collected as per the NAAEQS standards and are displayed at a location near the main gate. The results will also be sent to the Regional Office of MoEF, the MPCB office and the zonal office of the CPCB. Adequate monitoring and control systems have been provided for the same</i> |

| S. No. | Description | Compliance Status / Remarks |
|--------|---|---|
| iv | <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 & 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 MPCB.</p> | <p><i>Fugitive emissions will be controlled with the help of guidelines provided above</i></p> |
| v | <p>For further control of fugitive emissions, following steps shall be followed:</p> <ol style="list-style-type: none"> 1. Closed handling system shall be provided for chemicals. 2. Reflux condenser shall be provided over reactor. 3. System of leak detection and repair of pump/pipeline based on preventive maintenance. 4. The acids shall be taken from storage tanks to reactor through closed pipeline, storage tanks shall be vented through trap receiver and condenser operated on chilled water. 5. Cathodic protection shall be provided to the underground solvent storage tanks. | <ol style="list-style-type: none"> 1. <i>A closed handling system is provided for all chemicals handled in the manufacturing process</i> 2. <i>Reflux systems including condensers are provided for all reactors in the process.</i> 3. <i>A preventive maintenance procedure and schedule are in place for all manufacturing plants and utilities.</i> 4. <i>The acid to be used in the proposed expansion will be in a closed system as required.</i> 5. <i>No Underground Storage tanks are used.</i> |

| S. No. | Description | Compliance Status / Remarks |
|--------|---|---|
| vi | 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. | <i>Stack with adequate height is provided for DG and is enclosed acoustic enclosure</i> |
| vii | Total fresh water requirement from ground water source and tanker supply shall not exceed 480m ³ /day and prior permission shall be obtained from the CGWA/SGWA. | <i>The necessary permission from CGWA has been applied for and is in process</i> |
| viii | Industrial wastewater generation shall not exceed 27m ³ /day. Effluent shall be segregated into low organic effluent (Low TDS/COD) stream and high organic effluent stream (TDS/COD) effluent stream. Low TDS/COD effluent stream shall be treated in ETP, High Organic effluent stream (TDS/COD) effluent stream shall be concentrated in triple effect evaporator. Condensate will be reused for cooling tower make up. No effluent will be discharged outside the plant premises and Zero effluent discharge concept. | <i>The effluent management system will be executed as per the scheme proposed. The segregation and treatment of Low COD and high COD effluent stream will be processed as per the proposal with the water being recycled to suitable purposes such as Cooling Tower Makeup, gardening/afforestation, etc.</i> |
| ix | Process effluent/any wastewater shall not be allowed to mix with storm water, Storm water drain shall be passed through guard pond. | <i>A Guard pond has been provided for Storm Water and separate collection tanks for process effluents are provided for every plant to prevent mixing of any wastewater with the storm water.</i> |
| x | Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be by pumps. | <i>All hazardous chemicals are stored in closed tanks installed with the necessary safety devices. Dedicated pumps are provided for the transfer of all these chemicals.</i> |
| xi | 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 | <i>The Hazardous wastes will be disposed as per the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date for management of Hazardous wastes. A fully pressurized firefighting system is already available at the facility.</i> |

| S. No. | Description | Compliance Status / Remarks |
|--------|---|---|
| | prior permission from MPCB shall be obtained for disposal of solid hazardous waste in the TSDF. Measures shall be taken for firefighting facilities in case of emergency. | |
| xii | Fly ash shall be stored separately as per CPCB guidelines so that it shall not adversely affect the air quality, becoming air borne by wind or water regime during rainy season by flowing along with the storm water. Direct exposure of workers of fly ash & dust shall be avoided. | <i>Fly ash will be stored separately as per the CPCB guidelines and will be sold to authorized parties.</i> |
| xiii | 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. | <i>The company complies with the rules and Guideline under MSIHC rules, 1989. All transportation of the hazardous chemicals is as per the Motor Vehicle Act, 1989.</i> |
| xiv | 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 norms. | <i>A fully pressurized firefighting system is provided at the facility with hydrant points provided at the necessary locations.</i> |
| xv | Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act. | <i>The guidelines prescribed as per the Factories Act are followed for Occupation health and safety. Medical tests are done for workers at regular intervals and the records are maintained as per the Factories Act.</i> |
| xvi | All the commitment made regarding issues raised during the Public Hearing/consultation meeting held on 16 th May, 2014 shall be satisfactorily implemented. | <i>All the commitments made regarding the issues raised during the public hearing/consultation meeting have been satisfactorily implemented.</i> |
| xvii | At least 5 % of the total cost of the project shall be earmarked towards the Enterprise social responsibility based on Public Hearing issues and item-wise details along with time bound action plan | <i>A specific budget has been earmarked for CSR activities based in public hearing issues and will be executed in a time bound manner.</i> |

| S. No. | Description | Compliance Status / Remarks |
|------------------------------|--|--|
| | shall be prepared and submitted to the Ministry's Regional office at Bhopal. Implementation of such program shall be ensured accordingly in a time bound manner. | |
| xviii | As prosed, green belt over 33 % of the total project area shall be developed within plant premises with at least 10 meter wide green belt on all sides along the periphery of the project area, in downward direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO. | <i>The development of green belt area has been started and is being developed as per the proposed plan submitted.</i> |
| xix | Provisions 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, 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. | <i>Since the project was for expansion on existing plant facility and a local workforce is used, no housing required. Other basic facilities are already available at the existing site.</i> |
| B. GENERAL CONDITIONS | | |
| i | The Project authorities shall strictly adhere to the stipulations made by the Maharashtra Pollution Control Board. | <i>The stipulations made by the MPCB are adhered to.</i> |
| ii | No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forest. 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. | <i>The project is being executed as proposed. For any alterations and expansions in the project proposal, a prior approval of the MoEF shall be sought and obtained.</i> |

| S. No. | Description | Compliance Status / Remarks |
|--------|--|--|
| iii | The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826 dated 16 th November, 2009 shall be followed. | <i>The NAAQES are being followed.</i> |
| iv | The locations of ambient air quality monitoring stations shall be decided in consultation with the MPCB 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. | <i>The quality monitoring for ambient air is being carried out by NABET accredited laboratory and the monitoring stations are as per the guidelines provided by the MPCB.</i> |
| v | 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). | <i>The Noise levels in and around the plant area within standards as prescribed by the CPCB and the suitable sound control measures have been adopted.</i> |
| vi | During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste water and storm water drains. | <i>All precautions are being taken to avoid spillage of materials. Also, garland drains are provided at the periphery of the plant to avoid mixing of accidental spillages with domestic waste water and storm water drains. Utmost care is being taken to avoid any kind of spillages at all times.</i> |
| vii | Usage of Personnel Protection Equipments by all employees / workers shall be ensured. | <i>The use of PPE by all employees/workers is ensured.</i> |
| viii | 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. | <i>Regular training is imparted to the workers on safety and health aspects of handling and operation for the chemicals used. Medical examinations are for all workers are conducted on a timely basis.</i> |

| S. No. | Description | Compliance Status / Remarks |
|--------|---|---|
| ix | The company shall also comply with all the environmental protection measures and safeguards proposed in the project report 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. | <i>All the recommendations made in the EIA/EMP related to the project are implemented and all environmental protections measures are complied with.</i> |
| x | The company shall undertake CSR activities and all relevant measures for improving the socio-economic conditions of the surrounding area. | <i>Various CSR have already been undertaken. The company shall undertake further CSR activities as per the guidelines to improve the socio-economic conditions of the surrounding area.</i> |
| xi | The company shall undertake eco-developmental measures including community welfare measures in the surrounding area. | <i>Tree plantation drives and provision of free vocational training to the local population have been undertaken for community welfare.</i> |
| xii | A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be setup to carry out the Environmental Management and Monitoring functions. | <i>A full-fledged laboratory facility for environment management and monitoring purposes is being established for the Environment Management Cell.</i> |
| xiii | As proposed, the company shall earmark sufficient funds toward capital cost and recurring cost per 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. | <i>A separate budget for capital cost and the recurring cost has been allotted for environment management and pollution control measures. These funds are dedicated to the purpose as mentioned and shall not be diverted for any other purpose</i> |
| xiv | A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad /Municipal Corporation, Urban local Body and the local NGO. If any, from whom | <i>A copy of the clearance letter has been sent to the local Gram Panchayat body for perusal.</i> |

| S. No. | Description | Compliance Status / Remarks |
|--------|---|--|
| | <p>suggestions / representations, if any were received while processing the proposal.</p> | |
| xv | <p>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 Maharashtra Pollution Control Board. A copy of Environmental Clearance and six monthly compliance status reports shall be posted on the website of the company.</p> | <p><i>A six monthly report on the status of the compliance of the stipulated EC conditions will be periodically sent to the Regional office of the MoEF, the zonal office of the CPCB and the MPCB.</i></p> |
| xvi | <p>The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the Maharashtra 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 Bhopal Regional Offices of MoEF by e-mail.</p> | <p><i>The environment statement for each financial year ending March 31st in Form-V is being submitted to the MPCB. It will also be sent to the Bhopal Regional Offices of MoEF by e-mail. A copy for the year 2014-15 is enclosed herewith.</i></p> |
| xvii | <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 SPCB/Committee and may also be seen at Website of the Ministry at http://moef.nic.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</p> | <p><i>The public have been informed that the project has been accorded environmental clearance. The advertisement was placed in two local newspapers, namely The Free Press Journal (English) and Navshakti (Marathi) on 30th September 2014.</i></p> |

| S. No. | Description | Compliance Status / Remarks |
|--------|--|--|
| | concerned Regional Office of the Ministry. | |
| xviii | 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 date of start of the project. | <i>The dates of financial closure and final approval of the project along with the project start date have been informed to the Regional office.</i> |