

**ASSAM PETRO-CHEMICALS LIMITED**

(A Government of Assam Undertaking) | An ISO 9001:2008 Certified Company
CIN- U24116AS1971SGC001339, GSTN: 18AABCA6913A1Z6

Head Office & Factory Site:

Assam Petro-chemicals Ltd., Namrup, P.O. Parbatpur,
District: Dibrugarh, Assam-786623
Phone: (0374) 2500331/2500246/2500518, Fax: (0374) 2500231
Email: nrapl@sancharnet.in, admin_apl@assampetrochemicals.co.in

Ref No: APL/Proj/04/ 2018/ 1122

5 Sept, 2018

To
The Addl. Principal Chief Conservator of Forest (C),
Ministry of Environment, Forest and Climate Change,
North Eastern Regional Office (NEZ),
Law-U-Sib, Lumbatngen, Near MTC Workshop,
Shillong – 793021

Kind attn.: Shri S.K. AGGARWAL, IFS

Ph. No.- 0364- 2537609/7340/7395/7278 ; Fax – 0364-2536041

E-mail:- ronez.sng-mef@nic.in ; ro.nez.shil@gmail.com

Sub: Compliance of Specific and General Conditions as per the conditions of
Environmental Clearance (EC) letter.

Ref. No.: EC letter No.: F.No.J-11011/469/2011-IA II (I) Dated 19.05.2014.

Dear Sir,

In compliance of the Specific and General conditions as stipulated by the Environmental Clearance (EC) accorded by MoEF for the 500 TPD Methanol and 200 TPD Acetic Acid expansion project of APL, in their above mentioned letter, please find herewith our compliance report for the six-monthly period between 20 Nov,2017 to 19 May,2018 as given below:

Point no.	Description	APL's reports/views
A. SPECIFIC CONDITIONS		
i.	Environmental clearance is subject to their obtaining prior clearance from the Standing Committee of the National Board for Wildlife as applicable regarding Patkai Wildlife Sanctuary. Grant of environmental clearance does not necessarily imply that wildlife clearance shall be granted to the project and that their proposals for wildlife clearance will be considered by the respective authorities on their merits and decision taken. No work at the site shall be started without prior permission. The investment made in the project, if any, based on environmental clearance so granted, in anticipation of the clearance from wildlife angle shall be entirely at the cost and risk of the project proponent and Ministry of Environment & Forests shall not be responsible in this regard in any manner" and all the	In the 36 th meeting of the Standing Committee of National Board for Wildlife (NBWL), held on 4 Nov, 2015 at New Delhi, the Committee recommended the Project of APL for wildlife clearance.



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	recommendations shall be implemented in a time bound manner.	
ii	The project proponent shall prepare a plan for reducing leopard-human and elephant-human conflict in consultation with the Wildlife/Forest Department of the Government of Assam within 10 km of the project site.	<p>The recommendations of the management plan for human-elephant and human-leopard conflict prepared for Assam Petrochemicals Ltd by Aaranyak, Guwahati shall be implemented as mentioned after completion of construction activities at our Project site.</p> <p>Currently, Piling and Civil construction activities are going on at our site.</p>
iii	Adequate stack height shall be provided to gas turbine as per CPCB/Assam State Pollution Control Board (ASPCB) guidelines to disperse gases emissions into the atmosphere. Low NOx burners shall be provided with on-line analyzers.	As the Expansion Project of our company, Assam Petro-Chemicals Ltd, is in the initial stages of Project design and implementation (till date, only 24% of the overall Project is complete, with Piling work and Civil Construction work going on currently), we shall submit the stack height design to your good office as soon as we receive the same from our Project consultant.
iv	Ambient air quality data shall be collected as per NAAQES standards notified by the Ministry vide G.S.R.No.826(E) dt. 16 th Sept, 2009. The levels of PM _{2.5} , PM ₁₀ , SO ₂ , NO _x , CO and VOC shall be monitored in the ambient air 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 ASPCB. One air quality monitoring station shall be set up at Namrup Beat Office under Jeypore range of Dibrugarh Division of Forest Dept.	<p>Regular online monitoring of air has started in the existing plant. The same shall be continued in the new plant.</p> <p>Report on ambient air analysis dated 12.06.2018 is enclosed for ready reference as Annexure –I.</p> <p>Purchase order (enclosed as Annexure – PO) has been already placed for online monitoring of CO, NOx and SO₂ gas, which shall be installed soon.</p>
v.	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, scrubber and water sprinkling system. Dust suppression system including water	The updated data for all the specified constituents have been provided in Annexure- I as enclosed.

Signature



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	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 ASPCB. Regular monitoring of Volatile Organic Compounds (VOCs) should be carried out.	
vi.	For further control of fugitive emissions, following steps shall be followed: <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 reactors 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.	The engineering design and implementation plan for the required parameters of the upcoming plant shall be submitted to your good office upon receipt from our consultant during the later part of our Project execution.
vii.	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.	The design and implementation plan for the same shall be submitted to your good office upon receipt from our consultant. We shall comply with the required conditions during and after commissioning of our new expansion Project.
viii.	Total fresh water requirement from River Dilli shall not exceed 2809 m ³ /day after expansion and prior permission shall be obtained from the Competent Authority.	The new water intake plan of the Project has incorporated the requirements and the same shall be implemented during and after the commissioning of the Project.
ix.	Industrial effluent generation shall not exceed 1443 m ³ /day. Industrial effluent shall be treated in ETP comprises primary, secondary and tertiary treatment facilities. RO rejects shall be concentrated in MEE. Treated effluent (894 m ³ /day) shall be reused/recycled in process or horticulture purpose. Water quality of treated effluent shall meet the norms prescribed by CPCB/SPCB.	We have incorporated a plan for the required industrial effluent treatment with specifications not exceeding the given limit per day.
x.	No effluent shall be discharged outside the premises and 'Zero' effluent discharge shall be followed.	A Zero Liquid Discharge Plant (ZLDP) with required capacity is incorporated.
xi.	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	The same is designed accordingly.
xii.	Surface and ground water monitoring with regular interval will be done in the vicinity of the project by taking water samples	Surface and ground water are being monitored regularly.



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	from different locations to ensure that no objectionable wastewater is flowing out of the operating plants which may have impact on any wildlife under the category of schedule-I fauna.	The monitoring reports of water samples (surface and ground) dated 28.04.2018 have been enclosed for ready reference as Annexure-II.
xiii.	Process organic residue and spent carbon shall be sent to cement industries. ETP sludge and MEE concentrates shall be disposed off to the TSDF. Spent catalyst/resin shall be sent to authorized recycler/reprocessor.	Will be complied with. Presently the mentioned material is disposed of through a vendor.
xiv	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 MPCB shall be obtained for disposal of solid/Hazardous waste in the TSDF. Measures shall be taken for fire facilities in case of emergency.	Is being complied with for the existing plant, which shall be integrated with the new Plant.
xv.	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.	Is being complied with for the existing plant, which shall be integrated with the new Plant.
xvi	All the recommendations made in the risk assessment report shall be satisfactorily implemented.	<p>The recommendation are made basically on storage details of products and other materials, w.r.t. possible risk at plant area, i.e. pipeline rupture or leakage, material storage/dyke fire (instantaneous release). The implementation of recommendations for the same are as below which are being implemented during construction of project, pre-commissioning and commissioning, respectively:</p> <ol style="list-style-type: none"> 1. Storage tanks: Arrangements like independent high level alarm and trip off liquid inlet-line, low level alarm and provision of auto deluge water sprinkler system for each bulk storage tank to be made during commissioning stage. 2. The turbine building, switchyard, transformer yard, administrative building, pantry, first aid centre, fire stations, etc are to be located safely in light of worst accident scenarios. 3. In case of any tank on fire or fire in the vicinity, the cooling of adjoining tank to be resorted promptly. 4. The night vision wind sock is mounted on top of administrative building, and



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		<p>dyke area is to have adequate illumination so that people can move in upwind directions in event of massive spillage.</p> <p>5. Population growth around the plant and colony should be watched by appropriate authorities so that unauthorised growth of shanty colonies and hutments around the plant is avoided.</p> <p>No machinery of vital importance like fire fighting pump house, hydrant and fuel oil pump house should be placed within radiation contours of 32.0 kw/m² heat intensity.</p>
xvii.	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 norms.	We shall incorporate the requisites in our new Project designs.
xviii.	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	It is being done on an annual basis. The latest report is enclosed as Annexure-IV.
xix	Green belt shall be developed in 9.538 acres of land. Selection of plant species shall be as per the CPCB guideline	We have ensured maintenance and development of green belt in the existing and new Project sites, respectively.
xx.	All the commitments made to the public during the Public Hearing/Public Consultation meeting held on 6 th September, 2012 shall be satisfactorily implemented and a separate budget for implementing the same shall be allocated and information submitted to the Ministry's Regional Office at Shillong.	<p>The points are being implemented including:</p> <ol style="list-style-type: none"> 1. Pollution should be controlled at any cost which should be ensured: Regular air, water, soil samples are being tested which shows pollution under control. Report attached as Annexure-I. 2. Sample should be collected for air, water, soil, etc as suggested in the TOR: Is being done as shown in Annexure-I and Annexure-II. 3. Green belt should be developed: Is being developed further as APL already has sufficient green belt cover.
xxi	At least 5% of the total cost of the project shall be earmarked towards the Enterprises Social Commitment and item-wise details along with time bound action plan should be prepared and submitted to the Ministry's Regional office at Shillong. Implementation of such program shall be ensured accordingly in a time bound manner.	The guideline shall be complied with during the Project execution period.
xxii	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	<p>The current contractor working on the site, in consultation with us, has provided all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, etc.</p> <p>Moreover, we have provided housing facilities to the engineers and workers at our company quarters which have been allocated separately for</p>

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	construction wastes shall be managed so that there is no impact on the surrounding environment.	the Project duration. We have conducted health camps for the engineers and workers.
B. GENERAL CONDITIONS		
i.	The project authorities must strictly adhere to the stipulations made by the Assam Pollution Control Board (APCB), State Government and any other statutory authority.	Is being complied with.
ii	No further expansion or modification in the project shall be carried out without prior approval of the Ministry of Environment & 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.	Will comply with the requirements.
iii	The project authorities must strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 2000 as amended subsequently. Prior approval from Chief Inspectorate of Factories, Chief Controller of Explosives, Fire Safety Inspectorate etc. Must be obtained, wherever applicable.	Will be complied during commissioning of the new plant onwards.
iv	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 EPA Rules, 1989 viz. 75 DbA (daytime) and 70 DbA (nighttime)	The latest report of noise level monitoring is attached as Annexure-III.
v	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.	Already complied with.
vi.	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office	Is being complied with.

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	of MoEF, the respective Zonal Office of CPCB and the APCB. The Regional Office of this Ministry/CPCB/APCB shall monitor the stipulated conditions.	
vii.	The environmental statement for each financial year ending 31 st March in Form - V as is mandated to be submitted by the project proponent 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 conditions and shall also be sent to the respective Regional Offices of the MOEF by e-mail.	Has been submitted as Annexure-V.
viii.	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 APCB and may also be seen at Website of the Ministry of Environment and Forests at http://envfor.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 Regional office.	Already complied with.
ix.	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 commencing the land development work	Already informed through mail and hard copy vide letter no.: APL/Proj/04/242 dt. 12.11.2014.

Thanking you,

For and on behalf of
Assam Petrochemicals Ltd.

(S.K. Bora)
Sr. Manager (Project)



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Copy :

1. Kind attn: Dr. Sudheer Chintalapati
Scientist 'D'
Ministry of Environment, Forest & Climate Change,
Government of India (I.A. Division),
Indira Paryavaran Bhawan,
Jor Bagh Road, Aliganj
New Delhi – 110003
2. Member-Secretary,
Assam Pollution Control Board (PCBA),
Bamunimaidam, Guwahati-21
Ph: 0361-2652774/2550258
Email : membersecretary@pcbassam.org
3. Executive Engineer,
Regional Office, State Pollution Control Board, Assam,
Behind ASTC, Chowkidingee,
Dibrugarh- 786001