



# Assam Petro-Chemicals Ltd.

CIN-U24116AS1971SGC001339

(A Government of Assam Undertaking)

"An ISO 9001:2008 Certified Company"

NAMRUP - P.O. PARBATPUR - 786623 ASSAM (INDIA)

Phone : MD-2160776, 2500217 EPBX- 2500331,2500212,2500518,2500246

FAX : 2500231. STD : (0374) Email : nrapl@sancharnet.in

Ref No: APL/Proj/04/ 2018/ 068

25<sup>th</sup> Jan, 2018

✓ Kind attn: SHRI S.K AGGARWAL, IFS

Add. Principal Chief Conservator of Forests (C),  
Ministry of Environment, Forest and Climate Change,  
Regional Office (NEZ),  
Law-U-Sib, Lumbatngen, Near MTC Workshop,  
Shillong

Ph. No. 0364- 2537609/7340/7395/7278

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**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 with 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 reply for the six-monthly period between 20 May,2017 to 19 Nov,2017 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 Wild life Sanctuary. Grant of environmental clearance does not necessarily implies that wildlife clearance shall be granted to the project and that their proposals for wildlife	In the 36 <sup>th</sup> 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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	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 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.	Has already been complied with.
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.	Will be complied with.
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 <sup>th</sup> Sept, 2009. The levels of PM <sub>2.5</sub> ,PM <sub>10</sub> ,SO <sub>2</sub> ,NO <sub>x</sub> ,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	Enclosed herewith the report of the consultant engaged for the monitoring of the same as Annexure I. Data of the report shall be uploaded in our website.



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	Office under Jeypore range of Dibrugarh Division of Forest Dept.	
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 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.	The data for all the specified constituents have been provided in Annexure I as enclosed.
vi.	For further control of fugitive emissions, following steps shall be followed: <ol style="list-style-type: none"><li>1. Closed handling system shall be provided for chemicals.</li><li>2. Reflux condenser shall be provided over reactor.</li><li>3. System of leak detection and repair of pump/pipeline based on preventive maintenance.</li><li>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.</li><li>5. Cathodic protection shall be provided to the underground solvent storage tanks.</li></ol>	Will be complied with.



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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.	Will be complied with.
viii.	Total fresh water requirement from River Dilli shall not exceed 2809 m <sup>3</sup> /day after expansion and prior permission shall be obtained from the Competent Authority.	Will be complied with.
ix.	Industrial effluent generation shall not exceed 1443 m <sup>3</sup> /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 <sup>3</sup> /day) shall be reused/recycled in process or horticulture purpose. Water quality of treated effluent shall meet the norms prescribed by CPCB/SPCB.	Will be complied with.
x.	No effluent shall be discharged outside the premises and 'Zero' effluent discharge shall be followed.	Will be complied with.
xi.	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	Will be complied with.
xii.	Surface and ground water monitoring with regular interval will be done in the vicinity of the project by taking water samples 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.	Will be complied with.



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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.	Will be complied with.
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.	Will be complied with.
xvi	All the recommendations made in the risk assessment report shall be satisfactorily implemented.	Will be complied with.
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.	Will be complied with.



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xviii.	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Will be complied with.
xix	Green belt shall be developed in 9.538 acres of land. Selection of plant species shall be as per the CPCB guidelines.	Will be complied with.
xx.	All the commitments made to the public during the Public Hearing/Public Consultation meeting held on 6 <sup>th</sup> 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.	Has been complied with.
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.



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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 construction wastes shall be managed so that there is no impact on the surrounding environment.	Is being complied with.
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.	Will be 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 be complied with.



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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 with.
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)	Will be complied with.
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 of MoEF, the respective Zonal Office of CPCB and the APCB. The Regional Office of this Ministry/CPCB/APCB shall monitor the stipulated conditions.	Is being complied with.
vii.	The environmental statement for each financial year ending 31 <sup>st</sup> March in Form-V as is mandated to be submitted by the project proponent to the	Has been submitted as Annexure-II.





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	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.	
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 <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 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.



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Thanking you,  
For and on behalf of  
Assam Petro-Chemicals Ltd.

(A.C.Barman)  
General Manager (Project)

Copy to:

1. **Member Secretary,**  
State Pollution Control Board (PCBA), Assam,  
Bamunimaidam, Guwahati -21.

Phone: 0361-2652774/2550258  
Email: [membersecretary@pcbassam.org](mailto:membersecretary@pcbassam.org)  
[membersecretary@pcbassam.org](mailto:membersecretary@pcbassam.org)

2. **Executive Engineer,**  
Regional office, State Pollution Control Board, Assam,  
Behind ASTC, Chowkidingee,  
Dibrugarh-786001.

Phone: 0373-2325527  
Email: [ro\\_dibrugarh@pcbassam.org](mailto:ro_dibrugarh@pcbassam.org)