



Director (S)

Ministry of Environment & Forests
Eastern Regional office, Govt. of India
A/3, Chandrasekharpur, Bhubaneswar
Orissa -751023

Date: 30/11/09

Kind Attn: Dr. V P Upadhyay

Sub: Status Report of Compliance of the Conditions as per Environment Clearance letter No. J-11011/33/97. IA.II (I) dated 20/7/98

Dear Sir,

We are submitting herewith the status report for the period from **April'09–Sept'09** on the point wise compliance to the conditions as mentioned in the Environmental clearance for your kind perusal.

1. We had been continuing our monitoring of various Stacks with the help of approved Vendor of WBPCB/MoEF & as well as internally on periodic basis. Only quarterly monitoring of stacks are required as per the guidelines of the Air Consent letter & WBPCB is monitoring the same on quarterly basis. Analysis result from these stacks is enclosed as **Annexure - I**.
2. We have conducted ambient air quality monitoring from different locations inside as well as outside of the Factory (Within 10 km radius) depending upon predominant wind direction with the help of the approved vendor of WBPCB from each location on 24 hourly basis. The last monitoring has been conducted from April'09 – May'09 at five different locations (three inside the factory & other two outside the factory). All results are much below compared to the permissible limits. Refer **Annexure – II** for details.
3. Work environment monitoring is being done by the on-line static gas detectors, which are installed at various strategic locations inside the process plant & Tank farm area. These are being continuously monitored from DCS, which are provided with audio-visual signal & alarm. This time, the personal & static sampling will be conducted in Dec'09 for SPM, RPM, organic and inorganic vapour throughout the plant by third party.
4. Our Effluent Treatment Plant is operated under activated sludge with diffused aeration system. The treated effluent is being monitored on-line regularly through DCS. The Influent & Final discharge effluent quality standards are enclosed as **Annexure-III**. Besides, WBPCB is also collecting samples of final discharge treated effluent every month.
5. We have installed four number of waste water storage tanks having sufficient holding capacity for storage of Wastewater coming from various process discharges of the plant. This influent is being fed to the Aeration Tank at controlled rate as per their BOD & COD load through DCS. Besides, we have ETP pit of capacity 16,250 m³ (Big pit) & Small pit (17.85 m³)

from where the treated effluent is pumped and discharged to the river Hoogly through underground pipeline after monitoring pH, Temperature.

6. Effluent Quality Monitoring Station has been installed in the final effluent discharge stream. The treated effluent from ETP is collected in the ETP pit from where it is discharged through underground pipeline through sluice gate by pump to the river after continuously monitoring pH, Temp. by on-line analyzers. As the final treated effluent discharge is through a closed system so there is no chance of any contamination/mixing. In view of the above one monitoring station in the final effluent discharge stream is considered adequate. This was also physically inspected by WBPCB, Kolkata & Haldia officials. The total Effluent Treatment Plant is being connected with our system of the Plant (Distributed Control System). The analysis of different waste-water streams (COD & BOD) are being done by Laboratory regularly and the results are fed to DCS. Thus the feed rate of different waste water streams (Influent loads) to the inlet of ETP is controlled, so that the treated effluent quality meet the permissible limit. Thus the Effluent Treatment Plant is operated smoothly. The final treated effluent samples before discharge are being tested for all the parameters at our own laboratory once in a month, which is well equipped with all testing facilities. The test result of the final discharge effluent is enclosed as **Annexure-III**. In this regard, we would like to inform that due to our commissioning activities of the expansion project some of the parameters for final discharge were above the limit in April'09. We have replied to WBPCB regarding the probable reasons for such failure. Refer **Annexure – III a**.
7. The Marine Impact Assessment study for assessing the impact on Hooghly River due to disposal of treated effluent had been done and the same report had been submitted to MOEF & WBPCB, Kolkata before commissioning of the Project. From the report it was concluded that no impact on the river body is envisaged due to discharge of our treated effluent.
8. Permission under CRZ notification is not necessary for the location of our Factory as per the notification since Haldia development area is categorized as CRZ-II. The distance prescribed for CRZ-II is 100m for HTL. A Certificate on this issue provided by Haldia Development Authority along with the endorsed drawing of site-location had already been submitted to your office earlier.
9. All the hazardous & non-hazardous wastes are stored at our site in an Integrated scrap yard in a segregated manner. Refer **Annexure – IV** for details. The hazardous wastes are finally disposed through CHW-TSDF at Haldia & CPCB approved parties from the Scrap yard complying all the necessary legal requirements. A separate shed for used oil & waste oil had been constructed for storage of same to avoid environmental pollution. The amount of hazardous wastes disposed to TSDF during this period is enclosed (**Refer Annexure – V**).
10. WBPCB, Kolkata & Haldia are taking Air (Stack) & Waste water (treated & untreated) samples on regular basis as per the consent terms. Water Cess return is also being sent to WBPCB monthly for Water Cess Assessment. Moreover, rebate in water cess payment is being given by WBPCB for regularly complying with the final discharged norms.

11. The Authorization for handling & storage of Hazardous Waste has been taken from WBPCB, Kolkata as per Hazardous Waste (Management & Handling) Rules, 1989 amended till date and is valid upto 31/01/2011. Refer **Annexure-VI**.
12. All the rules and regulations of Manufacture, Storage & Import of Hazardous Chemicals Rules, 1989, amended up to date, are being followed by us and relevant reports and returns are being submitted to CIF, WBPCB & MOEF - Bhubaneswar. Approval/NOC/License had been taken separately from CIF, Govt. of W.B., Dock Safety Board - Kolkata, WBPCB - Kolkata, WBFSO - Kolkata & Petroleum & Explosives Safety Organisation (PESO).
13. "Occupational Health Centre" with trained doctor in Occupational health assisted by nurses & Dresser cum compounders with modern facilities had been set up. Periodic Medical Surveillance & Occupational Health Check -ups programme including pre - employment medical check up are being conducted as per schedule and records are maintained as per the statutory norms. Besides, various improvement work like Heat stress, Noise dosimetry, Ergonomics, Nutrition survey are being conducted.
14. A green belt of around 52 acres with adequate density (2000 trees/hector) has been developed surrounding the existing Factory. Species selected for green belt development are evergreen trees. We have planted 200 trees of pollution attenuation species in our expansion project area during celebration of World Environment Day'09. The green belt is being periodically maintained as per the requirement. New plantations of local species (Fruits, Flower etc) are done during celebration of World Environment day in every year.
15. A separate Environment Management Cell headed by GM - Health, Safety & Environment along with Sr. Manager, Senior Executive supported by Quality Control Laboratory, well equipped with modern Environment Monitoring and analytical Instruments, being handled by qualified & experienced Chemists under guidance of Executives & Sr. Managers had already been set up for carrying out various functions and various tests.
16. During previous visit of Dr. Upadhyay, he had been kind enough to waive the condition of a separate account in the bank for expenditure related to environmental protection. This had been minuted in the earlier MOM, a copy of which has already been sent to your office. Moreover, there is separate budget approved for Safety & Environment section, where all the environment management expenses are included.
17. The company is ISO 9001:2000, ISO:14001:2004 & OHSAS: 18001:2007 certified. Following awards have been received till date: a) 1st prize in Environment Excellence in manufacturing sector given by WBPCB & Indian Chamber of Commerce, 2004. b) 2nd prize in SHE by Confederation of Indian Industry (Eastern Region) - 2004-2005. c) 3rd prize in NSCI Safety award -2006.



18. Presently, a new PTA Plant is under construction (capacity of maximum 900000 TPA) within the existing premises. The necessary clearances from MoEF & WBPCB have been taken & half yearly project monitoring report is being sent.

We sincerely hope that the above compliance status report is in line with the approval letter accorded by MOEF for our Project and would meet your requirements. We are ready to provide any further clarifications, if necessary.

Thanking You,

Sincerely yours,
For **MCC PTA India Corp. Private Limited**

A handwritten signature in blue ink that reads "M Numata".

M Numata
Director - Production
Encl: a/a

CC: Sr. Env. Engineer (Planning), WBPCB
Sr. Env. Eng. & Incharge, CPCB, Kolkata