

Director(S)
Ministry of Environment & Forests
Eastern Regional office
Govt. of India
A/3, Chandrasekharapur
Bhubaneswar, Orissa -751023

Date: 22/11/2011

Kind Attn: Dr. V P Upadhyay

Sub: Six monthly Post Project monitoring progress report on the Compliance of the Conditions of the Environment Clearance

Ref: Environment Clearance No: J-11011/139/2006-IA II(I) Dtd. June 19,2006

Dear Sir,

We are submitting herewith the post project monitoring progress report for the period **(April'11 – September'11)** on the point wise compliance to the conditions as mentioned in Environmental clearance for your kind perusal. It may kindly be noted that all the Annexure mentioned in this letter as supplementary evidence/report are common & attached with the status report of Compliance of the Environment Clearance of Existing PTA plant.

A. Specific condition

- i. Emissions are being monitoring from various units and within the permissible limit. Stack monitoring is being done by approved third party. Result of stack emission is attached herewith. **(Refer Annexure - I)**. Moreover, Dioxin/Furan emission monitoring is being conducted from the Incinerator Emission. The Report is enclosed as **Annexure – I b**.
- ii. Ambient Air quality monitoring is started from September' 2011 and to be continued up to December'2011. **Refer Annexure - II**.
- iii. The PX tank is under Nitrogen blanketing with slight positive pressure to control fugitive emission from tank. Double mechanical seals are provided for pumps handling PX, Acetic acid, methanol. HC sensors installation completed.
- iv. The new standards will be followed. The process vents is being monitoring regularly. On-line VOC monitors have been installed at various strategic locations.
- v. LDAR programme has already been initiated and performed once in our existing plant. Out of 3115 points, major leakage was found from two sources and countermeasures taken immediately. Moreover, LDAR could not be conducted due to unstable operation & frequent break down of the new plant. The same will be

conducted on regular basis as soon as the plant will be stabilized. Summary report of LDAR programme is attached as **Annexure – VII**.

- vi. Low NOx burner already provided for HOH. Adequate stack heights for HOH, DEG & Incinerator made as per CPCB guidelines.
- vii. Scrubbers installed at various stages of the process & the vents from the scrubbers are connected to off-gas unit for complete destruction
- viii. The treated effluent is being discharged to river Hoogly only after meeting the prescribed standards. Separate effluent treatment plant has been constructed and the treated water of both the plants are being discharged through a common outlet. Monitoring data is attached herewith. **(Refer Annexure III)**
- ix. The new incinerator installed is based on CPCB specifications & norms.
- x. Total plantations around the project have been completed & yearly maintenance of green belt is going on.
- xi. The Occupational health surveillance conducted for the existing plant as well as for the expansion project.

B. General Condition

- i. The recommendations of the EIA/ EMP report and risk assessment report have been completed.
- ii. Noise levels are being monitored periodically in the work environment as well as the ambient noise levels. In this year the said monitoring will be conducted on December'11.
- iii. All the relevant provisions of Manufacture, Storage and Import of Hazardous Chemicals Rules 1989 as amended till date will be followed. Approval/ License from CCOE, Nagpur already taken for Storage for Petroleum products. (No. P/HQ/WB/15/854(P28267)
- iv. All the relevant provisions of Hazardous waste (Management, Handling & Transboundary Movement) Rules, 2008 as amended till date will be followed and necessary approval/ amendment is being taken from WBPCB.
- v. Adequate funds for recurring and non-recurring for the implementation of Environment Management Plan (EMP) have already been allocated. Separate HSE expense budget prepared and approved.
- vi. Six monthly compliance report and monitoring data submitted to MoEF, Bhubaneswar, periodically.
- vii. Already advertised in two local newspapers about the accordance of Environmental Clearance for the project.



The necessary 'Consent to Operate' under Air & Water Act, Public Liability Insurance Policy, authorization for hazardous waste etc. are being periodically renewed and updated.

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**


K. Fukui
Director – Production

Encl: as stated

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