

**Compliance Report for the conditions in the
Environmental Clearance # J.11011/914/2008-IA II(I) dated 29.04.2009
issued by Ministry of Environment and Forests, New Delhi
proposed expansion of pesticides unit by
United Phosphorus Ltd., Unit # 9, Haldia, West Bengal
Period December -10 to May - 11**

Condition		Compliance
No	Description	Status
01	Refer letter dated 04.11.2008 and subsequent communication dated 26.02.09 along with Form # 1, Pre-Feasibility Report and additional information on the abovementioned subject seeking environmental clearance under the Environmental Impact Assessment notification, 2006.	Noted and complied
02	MoEF has examined the application. It is noted that M/s, United Phosphorus Ltd. have proposed for expansion of Pesticide manufacturing unit from 325 MTPM to 950 MTPM. Besides by products will also be manufactured. The details of the products to be manufactured are annexed. The unit is located at Durgachak, Haldia, Dist. Purba Medinipue, West Bengal. Proposed expansion will be carried within the existing unit having land area of 60,703 m ² . No eco-sensitive areas are located within 10 km radius of the plant. Cost of the project will be Rs. 17.20 Crores.	Complied Company has obtained NOC & CFO for Asulam & Asulox. We have started manufacturing of Asulam & Asulox (formulation of Asulam) only. For other products we obtained NOC only. Capital investment for Asulam Plant is Rs 5.15 Crores.
03	It is noted that water requirement after the proposed expansion will be 453 m ³ /day and will be met from the Geonkhali water supply and bore well. The present effluent generation is 25 m ³ /day having facility for primary and secondary treatment which will be increased to 45 m ³ /day. Presently the effluent are treated in existing ETP and subsequently mixed with other streams like cooling tower blow down, and used for green belt development. About 15 m ³ /d of high TDS effluent from process are treated in multistage evaporated system and additionally 18 m ³ /d of high TDS effluent will be generated which will be treated in multi effect evaporator. The mother liquor will have mercury content of 3 to 5 ppm which will be treated by addition of caustic solution /lime and sodium sulphide to convert the soluble mercury to insoluble mercury sulphide. Subsequently, polyelectrolyte or alum will be added for flocculation followed by sludge separation. The effluent will have mercury level less than 0.01 mg/lit before sending to ETP. Power requirement of 4250 KW will be sourced from the WBSEB. Fuel requirement for boiler will be coal (60 MT/day). Fuel requirement for DG set will be HSD(250 lts/hr). Process emissions in the form of SO ₂ and HCl will be controlled by alkali and water scrubber respectively. The sodium sulphide and 30 % HCl will be recovered as by-product. The cyclone separator has been installed and stack height of 30 m is proposed for the 1 MT and 3MT coal fired boiler to control the particulate emissions.	Complied. Company has obtained NOC & CFO for Asulam & Asulox. We have started manufacturing of Asulam & Asulox only. For other products we obtained NOC only. Generated effluent is being treated in existing ETP.
04	Hazardous waste generation will be in the form of waste from process (6.5 MT/M) and waste from liquid effluent treatment (1.465 MTPM) which will be disposed at WBWM . Waste from MMT process Liquid (Hydrazine Hydrate) (100 MT/M) / Solid (Na Sulphate) (170 MTPM) will be consumed for MMT/sold. Waste from MMT process solid (Hydrazine Sulphate) (166.25	Noted and complied Company has obtained NOC & CFO for Asulam & Asulox. We have started manufacturing of Asulam & Asulox only. For other products we obtained NOC only. Hazardous waste is being disposed to WBWML. Company have

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	MTPM) will be sold to authorized party / WBWML. Rejected material/scrap (1.22 MT/month) will be disposed at WBWML. Coal ash from boiler (60 X 0.25 X 30 MT/month) will be sent for land filling. Asulam formulation (2 MT/month) and Pretilachlor Plant (3.85) will be disposed at WBWML. Used oil (1MTPM) will be sold to MoEF recyclers.	membership of WBWML for disposal of waste generated for landfilling and Incineration.
05	The pesticides manufacturing units have been listed at Sl.no. 5(b) under category 'A' of Environmental Impact Assessment Notification, 2006. The proposal was considered by the Expert Appraisal Committee (Industry) in its 90 th meeting held on 6-8 th January, 2009. The Committee sought additional information and deferred the proposal. On receipt of information, proposal was placed before the Expert Appraisal Committee in its 92 nd meeting held on 18-20 th March, 2009. The committee recommended the proposal for grant of environmental clearance as per para 7 (ii) of EIA Notification, 2006. As the unit is located in the industrial estate, the public hearing/ consultation of the project is not required as per para 7 (i)-III (b) Stage (3) – public consultation of EIA Notification, 2006.	Noted and Complied
06	Based on the information submitted by the project authorities, the Ministry of Environment and Forests hereby accords environmental clearance to above project under the provisions of EIA Notification, dated 14 th September 2006 subject to the compliance of the following Specific and General Conditions:	Noted and Complied
SPECIFIC CONDITIONS		
01	The effluent shall be segregated based on the pollution load. The biodegradable effluent shall be treated in the ETP for primary and secondary treatment and treated effluent after conforming to the prescribe standards shall be used for green belt development. The high TDS effluent shall be evaporated in the multistage evaporator. The mother liquor after mercury recovery shall be treated before discharging into ETP and shall be ensured that concentration of mercury conform to the prescribed standards.	Complied. Company has obtained NOC & CFO for Asulam & Asulox. We have started manufacturing of Asulam & Asulox only. For other products we obtained NOC only. Generated effluent is being treated in an existing ETP. Proposed ETP up gradation approved & will start shortly.
02	Process emissions in the form of SO ₂ and HCl shall be scrubbed with alkali and water scrubber respectively to control SO ₂ and HCL emissions. The by-product shall be recovered as sodium sulphite and 30 % HCl. The emissions shall be dispersed through stack of adequate height as per CPCB standards. The gaseous emissions from the DG sets shall be dispersed through stack of adequate height as per CPCB standards. Acoustic enclosures shall be provided to the DG set to control the noise pollution. The particulate emissions from the coal fired boiler shall be controlled by cyclone separator and emissions shall be dispersed through of stack of height as per CPCB standards.	Complied. Company has obtained NOC & CFO for Asulam & Asulox. We have started manufacturing of Asulam & Asulox only. For other products we have obtained NOC only.
03	The company shall upload the status of compliance of the stipulated environmental	Complied.

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	clearance conditions, including 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 the State Pollution Control Board. The criteria pollutant levels namely; SPM, RSPM, SO ₂ , NO _x (ambient levels as well as stack emissions) or critical sectoral parameters like VOC, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	Flue gas stacks and process stacks Monitoring results are well within limit.
04	The company shall adopt cleaner production technology to minimize the quantity of fresh water requirement and process effluent generation.	Complied.
05	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 for management of hazardous wastes and prior permission from GPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. The concerned company shall undertake measures for fire fighting facilities in case of emergency.	Complied.
06	The project authorities shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October, 1994 and January, 2000. All Transportation of Hazardous Chemicals shall be as per the MVA,1989.	Complied.
07	The company shall undertake following Waste Minimization measures :- a) Metering and control of quantities of active ingredients to minimize waste. b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. c) Use of automated filling to minimize spillage. d) Use of "Close Feed" system into batch reactors. e) Venting equipment through vapour recovery system. f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.	a) Complying. b) We are working on this at our R&D. c) We are using semi automatic machine for liquid filling. d) All liquids are being charged through day tank to reactor. And solid is being charged through rotary feeder. e) Complying. f) Complying.
"08	Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.	Complied . Company have stopped manual handling of Hazardous Chemicals.
09	The project authorities shall provide the chilled brine solution in secondary condenser for condensation of the VOCs. The project authority shall ensure that the solvent recovery shall not be less than 95%. The VOC monitoring shall be carried in the solvent storage area and data submitted to the Ministry.	Complied. We will arrange party shortly for VOC monitoring.

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10	Solvent management shall be as follows : A. Reactor shall be connected to chilled brine condenser system. B. Reactor and solvent handling p=ump shall have mechanical seals to prevent leakages. C. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery. D. Solvents shall be stored in a separate space specified with all safety measures. E. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. F. Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	A. Complied. B. Mechanical seals provided for reactor and solvent pumps. C. Complied. D. Complied. E. Complied. F. Complied.
11	Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys etc. An area of 33% shall be developed as green belt. Selection of plants species shall be as per the Guidelines of CPCB.	Complied. We developed 1000 sq. meter for Green belt & 1000 Nos of more trees are being planted in coming monsoon.
12	The Company shall harvest surface as well as rainwater from the rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water	Complied. Prepared rain water harvesting plan and will be implemented before monsoon.
13	Occupational health surveillance shall be carried out on regular basis and record shall be maintained as per Factories Act.	Complied. Company have regular medical check up for employees.
GENERAL CONDITIONS		
01	The project authorities shall strictly adhere to the stipulations made by the state Pollution Control Board.	Complied. There was no violation regarding compliance
02	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and 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.	Complied. We are following MoEF guide line
03	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	Complied. Company have regular monitoring and all parameters are well within the limit.
04	The gaseous emissions (NOx, HCl, & SO ₂ and SPM) and Particulate matter along with RSPM levels from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency. Stack monitoring for SO ₂ , NOx and SPM shall be carried.	Complied. Company have regular monitoring and all parameters are well within the limit.
05	The locations of ambient air quality monitoring stations shall be decided in consultation with the	Complied.

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	State Pollution Control Board (SPCB) and it shall be ensured that at least one stations is installed in the up wind and downwind direction as well as where maximum ground level concentrations are anticipated.	Done and is being maintained
06	Dedicated scrubbers and stacks of appropriate height as per the Central Pollution Control Board guidelines shall be provided to control the emissions from various vents. The scrubbed water shall be sent to ETP for further treatment or sell to actual end users.	Complied
07	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).	Complied.
08	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.	Complied.
09	Usage of PPEs by all employees/ workers shall be ensured.	Complied.
10	The project proponent 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 respect of environmental management and risk mitigation measures relating to the project shall be implemented.	Complied.
11	The company will undertake all relevant measures for improving the Socio-economic conditions of the surrounding area. CSR activities will be undertaken by involving local villages and administration	Complied. We 4 / 5 industries at haldia made a society who are running a school (ICSE / ISE). Not only students form us but out side children are allowed to study in the school. We are also paying donation which goes for development of local students.
12	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Complied.
13	A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carryout the Environmental Management and Monitoring functions.	Complied. Company have separate Environment Management cell.
14	The project authorities shall earmark adequate funds 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 provided shall not be diverted for any other purpose.	Complied.
15	A copy of the 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 who suggestions/ representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website	Complied.

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	of the company by the proponent.	
16	The implementation of the project vis-à-vis environmental action plans will be monitored by Ministry's Regional Office at Bhubaneswar /State Pollution Control Board/Central Pollution Control Board.	Complied.
17	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://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 concerned Regional Office of the Ministry.	Complied. As directed we have made advertisement in two local newspapers and copy of same was sent to Bhuvaneshwar.
18	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 the date of start of the project.	Complied.
19		

ANNEXURE - I

	Acephate	Metamitron	Ethion	Dimethoate	Asulam
Dec 10	98.23	0	38.15	0	114
Jan 11	95.56	0	22.97	0	133
Feb 11	61	0	15.2	0	134
Mar 11	99.2	0	0	0	162
Apr 11	98.9	0	0	0	90
May 11	99.1	0	40.45	0	134
CFO	100	OR 40	60	OR 60	200

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June 08, 2011

To,
The Director,
Ministry of Environment & Forest,
Govt. of India,
Eastern Regional Office,
A / 3, Chandrasekharpur,
Bhubaneswar – 751 023.

Dear Sir,

Sub. : Half yearly Environmental Clearance Compliance status report

Ref :- Environmental Clearance # J.11011/914/2008-IA.II(I) dated 29.04.2009

Kindly refer above Environmental Clearance ## J.11011/914/2008-IA.II(I) dated 29.04.2009 to our unit located at Durgachak, Haldia - 721602, Dist. - Purba Midnapore, W.B.,

Enclosed please find hard copy of half yearly status report for the month of December 2010 to May 2011 for our unit. A CD containing all details is also forwarded.

We hope that the above is in order. In case you need any additional information, we can provide the same on hearing from you.

Kindly acknowledge receipt of the same.

Thanks & regards.

Yours faithfully,
For United phosphorus Limited

B Bhattacharya
General Manager

Encl. : Status report,