



United Phosphorus Limited

117, G.I.D.C., Ankleshwar 393 002, Gujarat (India)
Phone : (02646) 250336, 251223, 251249, 250279 Fax : (02646) 250297



Responsible Care®

Ref: U1/EC-2010/11
August 03, 2011

Unit # 1
Plot # 117 / 118, GIDC, Ankleshwar – 393 002

Dr A Mehrotra, Director (S)
Ministry of Environment and Forests
Western Region Office
Kendriya Paryavaran Bhavan
Link Road # 3, E – 5, Ravi Shankar Nagar
Bhopal – 462 016 (M.P.)

Ack. copy

Dear Sir;

Sub: - Compliance to conditions of Environmental Clearance

Ref: - Environmental Clearance # J.11011/117/2002-IA.II dated 17.07.2003

Kindly refer above Environmental Clearance # J.11011/117/2002-IA.II dated 17.07.2003 to our Unit#1 located at plot no 117/118, GIDC Estate, Ankleshwar-393002, Dist – Bharuch, Gujarat.

We are sending herewith the compliance report along with various other required information with respect to our unit-#1 for your kind reference and records. The details given are with respect to the period January 2011 to June 2011.

The Company has constructed Hazardous Incinerable Waste Storage as per CPCB Guidelines. TOC / TKN Meter is available at ETP for continuous monitoring.

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

Thanking you

Yours faithfully
For, United Phosphorus Ltd

DR P.N. PARAMESWARAN
DR P.N. PARAMESWARAN
Vice President -Environment

CC: SD

Encl : a/a

Received
Gujarat Pollution Control Board
R.O. Ankleshwar
6.8.2011



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Copy to:

The Zonal Officer
Central Pollution Control Board
Parivesh Bhavan
Opp VMC ward Office-10
Subhanpura, Baroda-390023

: Mr. J D Kalyani – Regional Officer
Gujarat Pollution Control Board
Plot # 1501, GIDC Estate
Ankleshwar – 393 002,
Dist Bharuch

GPCB ID # 15833

*Compliance Report for the conditions in the
Environmental Clearance # J.11011/117/2002-IA.II dated 17.07.2003
issued by Ministry of Environment and Forests, New Delhi
for expansion of pesticide unit by
United Phosphorus Ltd., Unit # 1, Ankleshwar, Gujarat
Period Jan- Jun 2011*

Condition		Compliance Status
No	Description	
*	<p>The Environmental Clearance is issued for the following products</p> <ul style="list-style-type: none"> ⇒ Penoxaline @ 150 MT / Month ⇒ Cartap @ 50 MT / Month ⇒ Metabromuron @ 50 MT / Month ⇒ Phosphamidon @ 150 MT / Month ⇒ Dichlorovos @ 200 MT / Month; and ⇒ Antracol / Mancozeb @ 500 / 800 MT / Month <p>Environmental Clearance also contains the following by-products</p> <ul style="list-style-type: none"> ⇒ Hydrated Sodium Sulphate @ 737 MT / Month ⇒ Sodium Sulphite Solution @ 298 MT / Month ⇒ Sodium Bromide Solution @ 95 MT / Month ⇒ Sodium Sulphite Solids @ 31 MT / Month ⇒ Liquefied Methyl Chloride @ 131 MT / Month; and ⇒ 30 % HCL @ 138 MT / Month 	<p>Complied.</p> <p>Production details are attached for the period of Jan to Jun 2011</p>
*	<p>The land area of the project is 1,36,777 m². Project does not involve forest land and displacement of people. Water requirement is 951.1 kl / day. Solid waste in the form of ETP Sludge (30 MT / Month); Incinerator Ash (4.5 MT / Month) and Inorganic Solids from Monocrotophos Plant (75.6 MT / Month); Solid Salts (82 MT / Month); and Salt from RO System will be disposed off in the secured landfill facility. NOC from GPCB was obtained on 29.06.2002. Public Hearing was held on 16.01.2002</p>	
*	<p>MOEF accords Environmental Clearance to the project under provisions of EIA Notification dated 27.01.1994 as amended subsequently subject to compliance of various special and general conditions</p>	

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Condition		Compliance Status
No	Description	
A → SPECIFIC CONDITIONS		
1	Gaseous emissions (SO ₂ , NO _x , HCl, HC and Cl ₂) and PM from various process units should conform to standards prescribed by authorities. At no time, emissions to go beyond standards. During failure of pollution control systems, unit should not be restarted until measures are rectified to achieve the efficiency	<p>Complied.</p> <p>Monitoring done internally and through external agency.</p> <p>Reports are attached herewith for the period of Jan to Jun 2011</p> <p>All parameters are within permissible limit.</p>
2	Fugitive emissions in workplace environment, product, raw material storage areas must be monitored. Flue gas emissions should conform to standards prescribed by GPCB	<p>Complied.</p> <p>Fugitive emission monitoring at various locations are being carried out by our QA Department.</p> <p>Fugitive Emission Reports are attached herewith for the period of Jan to Jun 2011</p>
3	Process emissions (SPM, HCl, SO ₂ , Methyl Chloride and VOC) should be scrubbed through caustic ventury scrubber and conform to standards. Efficiency of scrubber to be improved and maintained as per best practicable technology. VOC data to be monitored and submitted to MOEF. Additional ventury scrubber for Mancozeb, Penoxaline, Phosphamidon plant and a scrubber for Cartap plant to be installed in addition to process scrubbers already installed in the unit	<p>Complied.</p> <p>Air pollution control systems are provided.</p> <p>VOC Monitoring is done through M/S Bharuch Enviro Infrastructure Ltd.</p> <p>The monitoring data is attached herewith.</p>

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Condition		Compliance Status
No	Description	
4	As reflected in EIA / EMP Report, effluent generation should not exceed 195 m ³ / day. The waste streams to be segregated into high and low pollution load streams. Effluent with high organic load to be incinerated and dilute streams like from R & D, washing, domestic, dilute streams from process and scrubber blow down, to be given primary, secondary and tertiary treatment before discharging into GIDC drain. Treated effluent to conform to standards. Non toxic effluent to be diverted to RO plant and re cycled to minimize fresh water consumption	<p>Complied.</p> <p>Treated effluent is discharged to GIDC drain to final Effluent treatment plant, BEAIL, Ankleshwar for further treatment & disposal to deep sea. Details of quantity discharged are attached herewith.</p> <p>The permeate from RO System is taken to cooling tower water make up.</p>
5	Waste stream should be treated before taking into solar evaporation pond. Solvent from effluent to be recovered before discharging into solar evaporation pond. As reflected in EIA / EMP Report, Company to install forced evaporation system for aqueous waste to avoid discharge of effluent into solar evaporation pond	<p>Complied.</p> <p>Company has discontinued Solar Evaporation ponds.</p> <p>Forced Evaporation System is in operation. Details are attached for the period Jan to Jun 2011</p>
6	Company to recover Methyl Chloride (CH ₃ CL) by installation of CH ₃ CL recovery plant. Solvent recovery to be improved and attempts to be made to achieve at least 90 % recovery wherever possible. Rest solvent which can't be recovered, to be incineration. Action to be submitted to Ministry within 3 months	<p>Complied.</p> <p>Methyl Chloride Plant is in operation.</p> <p>We have EDC solvent in Monocrotophos & having recovery of @ 97%</p>
7	Company to up grade existing incinerator for incineration of hazardous waste. Organic waste, solid waste generated, to be collected and incinerated for total destruction. As reflected in EIA / EMP Report, solid waste and ash obtained after incinerator should be stored in plant premises in a pit with impervious flooring and leachate collection system. Ash and sludge from ETP to be finally disposed off in a TSDF of BEIL. Leachate to be sent to ETP for treatment	<p>Complied.</p> <p>Company has discontinued operation of Incinerator.</p> <p>Company has taken membership of Common Incinerator at BEIL, Ankleshwar.</p> <p>Details of incinerable waste send to BEIL, Ankleshwar is attached for the period Jan to Jun 2011</p>

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Condition		Compliance Status
No	Description	
8	Destruction efficiency of incinerator to be assessed by agency like CPCB and reported. Company to monitor VOCs and data submitted to MOEF / CPCB / GPCB regularly	Not Applicable. Company has discontinued operation of Incinerator. Company has membership of common facility BEIL, Ankleshwar.
9	As per CREP, bio assay test to be replaced by Toxicity Factor Test Method developed by CPCB. TF=4 to be achieved by December 2003 and TF=2 by July 2006. Action plan to be submitted within 3 months	Complied. TF factor monitoring results are attached for the period of Jan to Jun 2011
10	Green belt in 0.2 hectares in addition to 3.66 hectares to be provided to mitigate the effect of fugitive emissions in the plant. Development of green belt along the boundary wall, open space and avenue roads to be improved in consultation with local DFO as per CPCB guidelines	Complied. Green belt area provided approx. 0.5 hectares in addition to existing Green belt area 3.66 hectares. This is an on going activity. During period Jan to Jun 2011 trees planted @ 52 nos
11	Company to adopt waste minimization / cleaner production techniques to reduce pollution load and action plan to be submitted to Ministry within 3 months	Complied.
12	Company to undertake rain water harvesting measures as per action plan submitted to Ministry	Complied. Rain water harvesting area = 3070 m ² Rain water collection capacity for monsoon period is 2000 KL. Rain water is being used in cooling tower.
13	Company to comply with Environmental Protection measures and safeguards recommended in EIA / EMA / RRA reports as well as recommendations of Public Hearing panel	Complied.
B → GENERAL CONDITIONS		

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1	Company to adhere to stipulations made by GPCB	Complied.
Condition		Compliance Status
No	Description	
2	No further expansion / modifications in the plant to be carried out without prior approval of MOEF. In case of deviations / alterations in the project proposals from those submitted, a fresh reference to be made to Ministry to assess adequacy of conditions imposed and add additional environmental protection measures required, if any	Noted and will be complied
3	Company to comply with MSIHC Rules 2000. Prior approvals of Chief Inspector of Factories, Chief Inspector of Explosives, Fire Safety Inspectorate etc, to be obtained	Complied.
4	Company to comply with HWM Rules and authorization from GPCB to be obtained	Complied Company have Consent & Authorization CC&A #31505 dated 05/06/2010 valid up to 16.06.2013
5	Overall noise levels in and around plant area to be kept within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc, on all sources of noise generation. Ambient noise levels to conform to standards i.e. 75 dBA (day time) and 70 dBA (night time)	Complied. Noise level monitoring results at different location around Plants area are attached.
6	Occupational health surveillance program to be undertaken as regular exercise for all employees, specifically for those engaged in handling hazardous substances. First aid facilities in OHC to be strengthened and medical records of each employees to be maintained	Regular medical check up of each employee has been conducted. Pre employment medical check up for new joining @ 36 Nos. for the period of Jan to Jun 2011

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7	A separate Environment Management Cell with full fledged laboratory to be set up to carry out the environmental management and monitoring functions	Complied. Water, Stack Monitoring, Bio Assay Test, TF Factor Test, Ambient Air Monitoring, voc monitoring, Solid Waste Analysis, Noise Level Monitoring are carried out. Also, Environmental Audit is being carried out regularly.
Condition		Compliance Status
No	Description	
8	Company to provide adequate funds for recurring and non-recurring expenses to implement the conditions stipulated by MOEF as well as state government along with implementation schedule for all conditions stipulated. The funds should not be diverted for any other purposes	Complied. The funds are already provided as part of manufacturing activities and operation of ETP / Incinerator. Separate cost codes are also available.
9	Implementation of the project and Environmental Action Plan to be monitored by MOEF, Regional Office at Bhopal, GPCB / CPCB. A six monthly compliance report to be submitted to monitoring agencies	Complied. Half yearly reports are being sent during first week of February and August every year to Ministry of Environment and Forests Regional Office, Western Region, Bhopal.
10	Company to inform that public that project has been accorded Environmental Clearance by Ministry and copies are available with GPCB and may be seen at MOEF's web site. This should be advertised within 7 days in two local news papers and copies to be submitted to RO	Complied. Published in Gujarati and English news papers; and copies submitted to GPCB and MOEF
11	Company to inform RO as well as Ministry, date of financial closure and final approval of the project by concerned authorities and date of commencing the land development work, if any	Complied.
-	Ministry may revoke or suspend the clearance, if implementation of any of the conditions is not satisfactory	Noted

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-	Ministry reserves the right to stipulate additional conditions if required. Company, in a time bound manner, will implement the same	Noted
-	The above conditions will be enforced inter-alia under provisions of various acts and rules	Noted