



MCPI Private Limited

(Formerly MCC PTA India Corp. Private Limited,
Materials Chemicals and Performance Intermediaries Private Limited)

Ref. No.MOEF&CC/11/22/ 1122

Date: 24.11.2022

The IGF& In charge,
GOI, MoEF&CC, Integrated Regional Office, Kolkata
IB – 198, Sector-III, Salt Lake City,
Kolkata - 700106

KA: MS. SOMA DAS, IFS

Sub: Six monthly status reports on the Compliance of the Conditions of the
Environment Clearance for new plant.

Ref: Environment Clearance No: J-11011/139/2006-IA II (I) Dated. June 19, 2006
& MOEF&CC EC Transfer: J-11011/139/2006-IA II (I) Dated: 19.01.2021

Dear Sir,

We are enclosing herewith EC compliance status report for the period (**April'2022 – September'2022**) 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.

The necessary 'Consent to Operate' under Air & Water Act, Public Liability Insurance Policy, and authorization for hazardous waste etc. is being periodically renewed and updated. We sincerely hope that the above compliance status report is in line with the approval letter accorded by MoEF&CC for our new plant and would meet your requirements. We are ready to provide any further clarifications, if necessary.

Thanking You,

Sincerely yours,
For **MCPI Private Limited**

A.C.Mishra
Plant Head

Encl: as stated

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

HALF YEARLY COMPLIANCE REPORT OF ENVIRONMENTAL CLEARANCE CONDITIONS

1. Name of the Project: **M/s MCPI Private Limited – Haldia (West Bengal)**
2. MOEF&CC EC Clearance: J-11011/139/2006-IA II (I) Dated:19.06.2006
&
MOEF&CC EC Transfer: J-11011/139/2006-IA II (I) Dated: 19.01.2021
3. **Period of Compliance Report: From 01.04.2022 to 30.09.2022**

Sl. No	Specific conditions	Compliance Status
(i)	<p>The gaseous emissions (SO₂, NO_x, HC & VOCs) from the various process units shall conform to the standards prescribed under Environment (Protection) Rules, 1986 or norms stipulated by the SPCB whichever is more stringent. At no time, the emissions level shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the units, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.</p>	<p>It is complied.</p>
(ii)	<p>Requisite numbers of ambient air quality monitoring stations, [SPM, SO₂, NO_x, &HC] shall be set up in the Petrochemical complex in consultation with SPCB, based on occurrence of maximum ground level concentration and down-wind direction of wind i.e maximum impact zone. The monitoring network must be decided based on modeling exercise to represent short-term GLCs. Continuous on-line stack monitoring equipment shall be installed for measurement of SO₂ and NO_x. Data on VOCs shall be monitored and submitted to the SPCB / Ministry.</p>	<p>Emissions are 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</p> <p>The monitoring was started in January'22 and was continued up to March'22 at six different locations (Five outside the factory & One inside the factory). Results enclosed in Annexure- IIa.</p> <p>Online ambient air quality monitoring station was commissioned in the month of April'12. Result of October'21 to March'22 is enclosed in Annexure – IIb Online stack monitoring data is transferring to WBPCB & CPCB server. Online effluent monitoring data is transferring to CPCB /WBPCB server</p>



Sl. No	Specific conditions	Compliance Status
(iii)	The company shall take measures for control of fugitive emissions for storage of Para –Xylene. Measures shall be taken for provision of double mechanical seals to all the pumps handling high vapors pressure materials, sensors for detecting HC/ toxic gas leakages at strategic locations, regular inspection of fixed roof tanks, maintenance of valves and other equipments.	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. Work zone air quality monitoring done in the month of December'21 for SPM, RPM, organic and inorganic vapors throughout the plant by third party. The result is enclosed in Annexure – IIc.
(iv)	All new standards/norms that are being proposed by the CPCB for petrochemical plants shall be applicable for the proposed PTA plant. The company shall conform to the proposed vent standards for organic chemicals including non-VOCs and all possible VOCs i.e. TOCs standard and process vent standards for top priority chemicals. The company shall install online monitors for VOC measurements. The project authorities shall take necessary measures to comply with the above proposed emission norms including monitoring facilities and intimate the same to this Ministry.	The new standards are being followed. The process vents is being monitoring regularly. On-line VOC monitors have been installed at various strategic locations.
(v)	M/s MCPI shall adopt Leak Detection And Repair (LDAR) program for quantification and control of fugitive emissions.	LDAR monitoring was done in our new plant. LDAR report is enclosed as Annexure-IId.
(vi)	To mitigate NOx emissions, the company shall install low NOx burners for hot oil heater. Adequate stack height for discharge of flue gas emissions from the hot oil heater, the DG set and incinerator shall be provided as per the CPCB guidelines.	Low NOx burner already provided for HOH. Adequate stack heights for HOH, DEG & Incinerator made as per CPCB guidelines.
(vii)	The company shall undertake measures for control of emissions by installation of scrubbers with adequate height as per the CPCB guidelines. All vents from the scrubber units shall be connected to off gas combustion system for complete incineration of off gases.	Scrubbers installed at various stages of the process & the vents from the scrubbers are connected to off-gas unit for complete destruction



SI.No	Specific conditions	Compliance Status
(viii)	As reflected in the EIA/EMP reports, the effluent generation shall not exceed 20832 m ³ /d (8100 m ³ /d of process effluent, 6615 m ³ /d from DM plant, and 120 m ³ /d of domestic effluent and 600 m ³ /d from other sources). The treated effluent after primary and secondary treatment shall comply with the standards stipulated by WBPCB/ Central Pollution Control Board. The treated effluent shall be discharged into the river Hooghly after conforming the prescribed standards.	The treated effluent is being discharged to river Hooghly only after meeting the prescribed standards. Separate effluent treatment plant has been constructed and the treated water of both the plants is being discharged through a common outlet. Monitoring data is attached herewith. (Refer Annexure – III)
(ix)	The company shall install incinerator for incineration of ETP and process sludge. The incinerator shall meet CPCB specifications.	The new incinerator was installed based on CPCB specifications & norms. At present Incinerator was stopped on temporary basis. Process and utility Sludge (ETP) send to OCL India Ltd (Cement Unit) for Co-processing and WBWML (authorized TSDF) for safe disposal.
(x)	Green belt shall be provided to mitigate the effects of fugitive emissions all around the plant in an area of 10 ha in consultation with DFO as per CPCB guidelines.	Total plantations around the project have been completed & yearly maintenance of green belt is going on. Taken consultation from DFO – Enclosed copy of letter received from DFO as Annexure -VIII and as per recommendations we will further develop by plantation with local plants in existing green belt. Every Year we are celebrating World Environment Day and distributing plants to local community and doing plantation in side our Factory Green Belt, some photographs are enclosed as Annexure -VI
(xi)	Occupational Health Surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	The Occupational health surveillance is conducted for the existing plant as well as new plant.



Sl.No	General conditions	Compliance Status
(i)	The project authorities must strictly adhere to the stipulations made by the West Bengal State Pollution Control Board and the State Government.	Complied
(ii)	No further expansion or modernization in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.	No expansion is done
(iii)	At no time, the emissions should go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the units, the respective units should be immediately put out of operation and should not be restarted until the desired efficiency has been achieved.	Yes, it is complied
(iv)	All the recommendations made in the EIA/EMP report and risk assessment reports should be implemented.	The recommendations of the EIA/ EMP report and risk assessment report have been completed.
(v)	The overall noise levels in and around the plant area should be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Noise levels are being monitored periodically in the work environment as well as the ambient noise levels. Test Reports are enclosed as Annexure-VII
(vi)	The project authorities must strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules 1989 as amended in 2000 for handling of hazardous chemicals etc. Necessary approvals from Chief Controller of Explosives must be obtained before commission of the project.	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))



Sl.No	General conditions	Compliance Status
(vii)	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2008. Authorization from the State Pollution Control Board must be obtained for collections/treatment/storage/disposal of hazardous wastes.	All the relevant provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 as amended till date followed and necessary approval/ amendment is being taken from WBPCB.
(viii)	The project authorities will provide adequate funds both recurring and nonrecurring 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 should not be diverted for any other purposes.	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. Last 3 years Environmental Expenditure details are also attached as Annexure IX
(ix)	The stipulated conditions will be monitored the Regional of this Ministry at Bhubaneswar Kolkata (new Regional office was established in Kolkata in the year 2020)/Central Pollution Control Board/State Pollution Control Board. A six-monthly compliance report and the monitored data shall be submitted to them regularly.	Six monthly compliance report and monitoring data submitted to new MoEF&CC, Regional Office located in Kolkata, periodically.
(x)	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 State Pollution Control Board/Committee and may also be seen at Website of the Ministry of Environment and Forests at http://www.envfor.nic.in . This should 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.	Complied
(xi)	The Project Authorities should 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 of the land development work.	Complied

