

Ref. No.MOEF&CC/05/23/ 1167

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

KA: MS. SOMA DAS, IFS

Kolkata - 700106

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

Date: 25.05.2023

Dear Sir / Madam,

We are enclosing herewith the EC compliance status report for the period (October'2022 – March'2023) 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 will 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)

MOEF&CC EC Clearance: J-11011/33/97. IA. II (I) dated 20/07/1998.
 MoEF&CC EC Transfer: J-11011/33/97. IA. II (I) dated 19.01.2021.

3. Period of Compliance Report: From 01.10.2022 to 31.03.2023

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SI. No	Conditions	Compliance Status	
(i)	Gaseous and emissions (SPM, SO2, CO, HC & NOx) from the various process units should conform to the standards prescribed by the competent authorities from time to time. At no time, the emissions level should go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the units, the respective unit should be put out of operation immediately and should not be restarted until the control measures are rectified to achieve the desired efficiency.	It is complied.	
(ii)	Adequate number of air quality monitoring station should be set up in the down wind direction as well as where maximum ground level concentrations of SPM, SO2, NOx are anticipated in consultation with the State Pollution Control Board. The air quality monitoring stations should be selected based on modeling exercise to represent short term ground level concentrations, sensitive targets etc., Stack emission should be monitored regularly by setting stack monitoring devices in consultation with the state pollution control board.  Data on stack emissions and ambient air quality including work zone should be submitted to this Ministry once in six months and the state pollution control Board once in three months along with the statistical analysis.	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 bases.  The monitoring was started in October'22 and was continued up to March'23 at six different locations (Five outside the factory & One inside the factory). Results enclosed in Annexure-IIa.  An online ambient air quality monitoring station was commissioned in the month of April'12. Result of October'22 to March'23 is enclosed in Annexure – IIb	



SI. No	Conditions	Compliance Status
		We had been continuing our monitoring of various Stacks with the help of approved Vendor of WBPCB / MoEF&CC on periodic basis. Only quarterly monitoring of stacks is required as per the guidelines of the Air Consent letter & WBPCB is monitoring the same on quarterly basis. Analysis results from these stacks are enclosed as <b>Annexure - I</b> .
		Attached Stack Monitoring and AAQM monitoring vendor's NABL / MOEF&CC approval copies as <b>Annexure-1a</b>
(iii)	Work area air quality should meet the standards prescribed by the competent authorities/ OSHA. Fugitive emissions (HC) should be controlled, regularly monitored and data recorded.	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 was done in the month of <b>December'22</b> for SPM, RPM, organic and inorganic vapors throughout the plant by third party. The result is enclosed in <b>Annexure – IIc.</b> LDAR monitoring was done in our DP plant. Report is enclosed as <b>Annexure – IId</b>
(iv)	Liquid effluents coming out of the plant and the township should conform to the standards prescribed by the competent authorities from time to time. Recycling and reuse of the treated wastewater should be maximized to the extent possible. Tertiary treatment facilities should be provided as committed in the EMP	Our Effluent Treatment Plant is operated under activated sludge with diffused aeration system. The treated effluent is being monitored on-line (pH & Temp.) regularly through DCS. WBPCB also collects samples of final discharge treated effluent every month.  The Final discharge effluent quality results are



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	Guard ponds of sufficient holding capacity should be provided to cope up with the effluents discharge during the process disturbances. The contributing units should be immediately shut down and should not be restarted without bringing the system back to normalacy.	We have installed four number of wastewater storage tanks having sufficient holding capacity for storage of Wastewater coming from various process discharges of the plant.
(v)		This influence 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, COD, BOD & TSS.
(vi)	Adequate number of effluent quality monitoring stations should be set up in consultation with the State Pollution Control Board. Regular monitoring should be carried out for PH, SS, BOD, COD. The monitored data along with statistical analysis and interpretation in the form of a report should be submitted to this ministry once in six months and the SPCB once in three months.	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 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 monitored through DCS (Distributed Control System).  The analysis of different waste-water streams (COD & BOD) is being done by Laboratory regularly and the results are fed to DCS. Thus, the feed rate of different wastewater streams (Influent loads) to the inlet of ETP is controlled, so that the treated effluent quality meets the permissible limit. Hence the Effluent Treatment Plant is operated smoothly.



SI.No	Conditions	Compliance Status
		The final treated effluent samples before discharge are 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 <b>Annexure-III</b> .
		Online effluent monitoring system was installed at final discharge point and the online effluent monitoring data is transferring to CPCB server & WBPCB website.
(vii)	A study to assess the impact on Hooghly River due to disposal of treated effluent should be carried out. The marine outfall point, and route of the pipeline should be finalized based on the recommendation of the marine impact study before commissioning the project. Approval from WBPCB should be obtained for the above.	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&CC & 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.
(viii)	Permission under CRZ Notification must be obtained for the proposed facilities in the coastal stretch, if applicable and the conditions strictly adhered to.	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.
(ix)	A secured double lined landfill should be developed for disposal of solid waste by providing impervious liner and leachate collection system. The design of the landfill site should be submitted within 3 months for Ministry's consideration and approval.	All the hazardous & non-hazardous wastes are stored at our site in an integrated scrap yard in a segregated manner. Refer <b>Annexure</b> – <b>IV</b> for details. The hazardous waste is finally disposed through CHW-TSDF at Haldia & CPCB approved parties from the Scrap yard complying with all the necessary legal requirements. A separate shed for used oil & waste oil had been constructed for storage of some to avoid environmental pollution. The number of hazardous wastes disposed to TSDF during this period is enclosed. <b>Refer Annexure</b> – <b>V</b> .

