



Tamilnadu Petroproducts Limited

Ref: TPL – ECH - PO/ 2020

05th October 2020

The Director (S)
Ministry of Environment & Forest,
Regional Office, First & Second floor
Handloom Export Promotion Council
34, Cathedral Garden Road
Nungambakkam,
Chennai – 600 034.

Dear Sir,

Sub: TPL – ECH – PO Plant – Environmental Clearance (EC) – Six Monthly
Compliance Report – reg.

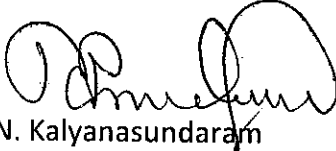
Ref: 1) F.No. J-11011/280/2013-IA-II (I) dated 15.05.2015
2) F.No. J-11011/280/2013-IA-II (I) dated 31.01.2017

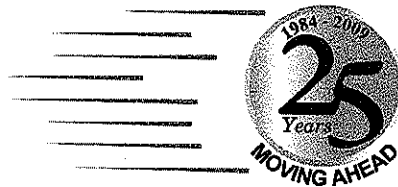
This has reference to the Environmental Clearance obtained from MoEF, New Delhi for product mix change a existing ECH plant located at Manali, Chennai.

We enclose herewith the compliance status report for the period from April 2020 to September 2020 for your kind reference.

Thanking you,

Yours faithfully,
For Tamilnadu Petroproducts Limited


N. Kalyanasundaram
VP – Operations



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TPL GSTIN : 33AAACT1295M1Z6




**Environmental Clearance Compliance Status Report
For the period from April 2020 to September 2020**

Ref : No. J – 11011/280/2013 – IA.II(I) dated 15.05.2015

(A) Specific Condition:

No	Condition	Status
i	<p>Caustic scrubber shall be provided to control Chlorine emissions. The scrubbed water should be sent to ETP for further treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. Scrubber vent shall be provided with on-line detection and alarm system to indicate higher than permissible value of controlled parameters. At no time, the emission levels shall go beyond the prescribed standards. The system should be interlocked with the pollution control equipments so that in case of any increase in pollutants beyond permissible limits, plant should be automatically stopped.</p>	<p>Caustic scrubber is provided to control Chlorine emissions and is being efficiently maintained and monitored.</p> <p>The scrubbed water is sent to ETP for further treatment.</p> <p>Online Chlorine analyser is installed in the scrubber vent stack and monitoring data has been connected to TNPCB.</p> <p>Monitoring system is provided with interlock.</p>
ii	<p>Ambient air quality data shall be collected as per NAAQS standards notified by the ministry vide GSR No. 826 (E) dated 16.09.2009 the levels of PM₁₀, PM_{2.5}, SO₂, NO_x, CO, Cl₂, VOC and HC (methane and non-methane) shall be monitored in the ambient air and emission from stacks and displayed at a convenient location near the main gate of the company and at important public places. The company shall upload the 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 Tamilnadu Pollution Control Board /TNPCB)</p>	<ul style="list-style-type: none"> • Continuous Ambient Air Quality online analyser for monitoring PM₁₀, PM_{2.5}, Chlorine and VOC in ambient air is installed and monitoring data has been connected to TNPCB / CPCB. • Continuous stack analyser for monitoring PM, SO₂, NO_x and CO in Boiler stack is installed and monitoring data has been connected to TNPCB / CPCB. • Continuous stack analyser for monitoring Chlorine in Scrubber stack is installed and monitoring data has been connected to TNPCB / CPCB. • DG is not in operation and hence no stack analyser provided. • Display board is installed at the main gate for displaying the Air Quality monitoring and water quality monitoring data. • Ambient Air Quality is being monitored periodically through internal / external accredited




		<p>laboratory as per the NAAQS standard notified by MOEFCC and the monitoring results are displayed near the main gate.</p> <ul style="list-style-type: none"> • The monitoring data of AAQ, Stack emission, Trade treated Effluent and sewage treated Effluent and drinking water results are attached as Annexure - 1 • The monitoring data is uploaded in the TPL website and is being updated periodically.
iii	<p>In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling and conveyance of chemical/materials, multi cyclone separator and water sprinkler system. Dust suppression system including water sprinkler system shall be provided at loading and unloading areas to control dust emissions. Fugitive emission in the work zone environment. Product, war materials storage area, etc., shall be regularly monitored. All necessary steps should be taken for monitoring of Chlorine as well as VOC in the proposed plant.</p>	<p>Raw material and products are handled in closed pipelines. Lime is being handled in a closed shed. The storage areas, loading and unloading areas shall be regularly monitored and housekeeping shall be maintained to control fugitive emission. Continuous online analyser for monitoring Chlorine and VOC in ambient air is provided and monitoring data has been connected to TNPCB / CPCB.</p>
iv	<p>The gaseous emissions from DG set shall be disposed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.</p>	<p>Presently DG is not in operation.</p>
v	<p>Leak Detection and Repair programme shall be prepared and implemented to control HC/VOC emissions. Focus shall be given to prevent fugitive emissions for which preventive maintenance of pumps, valves, pipelines are required. Proper maintenance of mechanical seals of pumps and valves shall be given. A preventive maintenance schedule for each unit shall be prepared and adhered to. Fugitive emissions of HC from product</p>	<p>Leak Detection And Repair (LDAR) programme is prepared and implemented to control HC/VOC emission. LDAR survey was carried out thro accredited laboratory during July 2020 and implemented. Preventive maintenance schedule of pumps, valves and pipelines is prepared and being followed. Mechanical seals of pumps and valves are being properly maintained.</p>



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	storage tank yards etc., must be regularly monitored. Sensors for detecting HC leakage shall be provided at strategic locations. Company shall protect their equipments from aging.	Preventive maintenance schedule for each unit is available and being adhered. Online detector for monitoring VOC / HC is provided in the propylene storage bullet area.
vi	Alarm for chlorine leakage if any in the liquid chlorine storage area is provided along with automatic start of the scrubbing system.	Chlorine is not stored in storage tanks and is transferred through pipeline from HCD plant. Chlorine Scrubber is provided for evacuation of chlorine in line during any emergency and it is monitored by Online analyser with alarm.
vii	Total water requirement from CMWSSB water supply shall not exceed 1650 m ³ /day and prior permission should be obtained from competent authority.	City sewage water treated by tertiary treatment from CMWSSB (TTRO water) is being used instead fresh water and not exceeding the authorised quantity.
viii	As proposed, industrial effluent shall be treated in ETP. Treated effluent from ETP shall be discharged to sea after conforming to the standards prescribed for the effluents discharge and obtaining permission from the TNPCB. Domestic sewage should be treated in STP.	Effluents generated from PO plant are treated in the Effluent Treatment plant and is disposed to sea after conforming to the prescribed standards as stipulated by TNPCB. Sewage effluent is treated in STP.
ix	Treated effluent should be passed through guard pond. Monitoring (24*7) through online pH meter, flow meter and TOC analyser should be installed. The data to be made available to the respective SPCB and in the company's website.	Online Monitoring System for water monitoring is provided for the parameters pH, TOC (BOD / COD), TSS, Flow and Temperature and the monitoring data has been connected to TNPCB and company website.
x	The company shall obtain Authorisation for collection, storage and disposal of hazardous waste under the Hazardous waste (MH and TB) Rules 2008 and amended as on date for management of Hazardous wastes and prior permission from TNPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. Measures shall be taken for fire fighting facilities in case of emergency.	Hazardous waste authorisation is obtained from TNPCB as per Hazardous waste (MH and TB) Rules 2008 for disposal of hazardous waste generated at PO plant. Authorisation No: 3563 valid up to 10.03.2020 and extended to 30.09.2020. Renewal applied and awaits approval. Fire fighting facilities are provided to mitigate any emergency.
xi	The company shall strictly comply with the rules & guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules 1989 as amended time to time. All	Hazardous chemicals are being handled as per the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules 1989 and Hazardous Chemicals shall be transported as per the Motor Vehicle Act



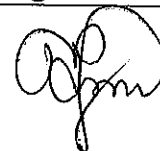
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	transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA) 1989	(MVA) 1989.
xii	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms. Fire hydrant system shall be provided along with fire monitor and flame detection system in the process as well as storage areas.	Fire fighting system inclusive of fire water reservoir, fire water pumps, fire hydrants, water monitors, Portable extinguisher and flame detection system is provided and covered to the entire plant area.
xiii	All the recommendations made in the risk assessment report should be satisfactorily implemented.	All the recommendations given in the risk assessment report are complied.
xiv	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the factories Act	Occupational health surveillance for regular employees and new employees is being carried out and the health records are maintained as per the Factories Act.
xv	As proposed, greenbelt should be developed at least 48561 m ² area in and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Selection of plant species should be as per the CPCB guidelines.	Existing green belt area: Total area: 48561 m ² (4.8562 Hectare) Green belt is developed in and around the plant premises as per the CPCB guidelines in consultation with DFO to mitigate the fugitive emission.
xvi	Provision shall be made for the housing for the construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, safe drinking water, medical health care, crèche etc., the housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	Contract workers for construction activity are engaged from nearby location and hence housing facility is not provided. Construction wastes were properly managed.



(B) General Condition:

	Conditions	
i	The project authorities shall strictly adhere to the stipulations made by the State Government and TN Pollution Control Board.	Shall be complied
ii	No further expansion or modification 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.	Shall be complied. Expansion or Modification shall be carried out after getting prior approval of the Ministry of Environment and Forests.
iii	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control board (SPCB) and it shall be ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentration are anticipated.	Locations of ambient air quality monitoring stations shall be decided as per the TNPCB requirement. Also ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentration is anticipated.
iv	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 1989 viz 75 dBA (day time) and 70 dBA (night time)	Adequate noise control measures including acoustic hoods, silencers, enclosures, etc., are installed at all sources of noise generation and the noise level is within the prescribed standards. Ambient noise level results of analysis are attached as Annexure.
v	The company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	Rain water harvesting facility was provided in Mechanical workshop and Fire water pump house building to collect rain water into freshwater reservoir. The harvested water is utilised for process activities to conserve fresh water. Recharge percolation pits were provided to recharge the ground water.




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vi	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. Training to all employees on handling of chemicals shall be imparted.	Safety induction training for new employees and safety refreshing training for regular employees are being conducted on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis.
vii	Usage of personal protective Equipments (PPEs) by all employees / workers shall be ensured	Ensured the usage of Personal protective Equipments (PPEs) by all employees / workers.
viii	The company shall also comply with all the environmental protection measures and safe guards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management. Risk mitigation measures and public hearing relating to the project shall be implemented.	All the recommendations made in the EIA/EMP in respect of environmental management. Risk mitigation measures and public hearing relating to the project shall be implemented to protect the environment.
ix	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area CSR activities shall be undertaken by involving local villages and administration	Constructed New Toilet block in Government High School at Manali New Town by AM Foundation on behalf of Tamilnadu Petroproducts Ltd, Manali under its CSR project and inaugurated on 24.10.2019. Facility provided: * Boys unit - 28 urinals & 2 Closets. * Girls unit - 12 urinals, 2 Closet with sanitary napkin changing facility for girls. * Two wash basins provided * Rain water harvesting systems provided in the toilet blocks. * Galvalume roof sheet fixing on existing toilet including roof MS Structural purlin support. * Renovation of existing toilets.
x	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Shall be complied
xi	A separate Environmental management cell equipped with full fledged laboratory	Environmental management cell equipped with full fledged laboratory facilities is



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	facilities shall be set up to carry out the Environmental Management and Monitoring functions.	available for carrying out the Environmental Management and Monitoring functions.
xii	The company shall earmark sufficient funds towards capital cost and recurring cost/annum 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 earmarked for environmental management / pollution control measures shall not be diverted for any other purpose.	Adequate funds are allocated and the funds so earmarked for environmental management / pollution control measures shall not be diverted for any other purpose.
xiii	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat / Municipal corporation, urban local body and local NGO, if any from who suggestions/representations, if any were received while processing the proposal.	Shall be complied
xiv	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental clearance conditions including results of monitored data (both in hard copies as well as email) to the respective Regional office of MoEF, the respective Zonal office of CPCB and the TN pollution Control Board. A copy of Environmental clearance and six-monthly compliance status report shall be posted on the website of the company.	Six monthly reports on the status of the compliance of the stipulated environmental clearance conditions including results of monitored data for the period Sep 19 to Mar 20 was submitted to MOEF regional office thro email on 29.06.2020 and also uploaded in the MOEFCC portal. A copy of Environmental clearance and six-monthly compliance status report was posted on the website of the company
xv	The environmental statement for each financial year ending 31 st March in Form – V as is mandated shall be submitted to the concerned State pollution Control Board as prescribed under Environment (Protection) Rules 1986, as amended subsequently shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also sent to the respective Regional offices of MoEF by email.	The environmental statement (Form – v) for the period April 19 – March 20 was submitted to TNPCB on 30.09.2020. Copy of the Form – V is attached as Annexure – 2. A copy of Form V was posted on the website of the company.



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xvi	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 news papers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy	Details of the Environment clearance obtained from the MOEFCC was advertised in English and Tamil news paper. Copy of the public notice is attached as Annexure - 3.
xvii	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. Details were informed to Regional Office, MOEFCC.

