

Ref: U2/EC-2010/11
February 20, 2011

Unit # 2
Plot # 3405 / 3406, 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.)

Dear Sir;

Sub: - Compliance to conditions of Environmental Clearance

Ref: - Environmental Clearance #J.11011/77/2002-IA.II dated 17.07.2003

Kindly refer above Environmental Clearance #J.11011/77/2002-IA.II dated 17.07.2003 to our Unit#2 located at plot no 3405/3406, 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 #2 for your kind reference and records. The details given are with respect to the period July to December -2010.

ETP expansion work is undertaken to meet future requirements.

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
Vice President -Environment

Encl : a/a

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
 GIDC Phase II
 Narmada Nagar
 Bharuch – 392 015

Period July-10 to December -2010
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Condition		Status of Compliance
No	Description	Period: July-2010 to December-2010
<p>The Ex Post Facto Environmental Clearance is granted for the following products;</p> <p>⇒ Phorate / Turbuphos @ 3600 MT / Year; and (2400 MT after product mix) Complied.</p> <p>⇒ Acephate @ 960 MT / Year (1920 MT after product mix) the product mix have been revised without increasing pollution load and after obtaining No Increase in Pollution Load certificate from GPCB.</p> <p>Land of project area is 65,625 m². Project does not involve forest land and displacement of people. Water requirement is 340.1 m³ / day. Solid waste in form of ETP Sludge (7.5 MT / Month), incinerator ash (9 MT / Month) and Inorganic Salts from Evaporation System (30 MT / Month) will be disposed off in BEIL landfill. Public Hearing was done on 16.01.2002. GPCB has granted NOC for 300 MT / Month of Phorate / Turbuphos on 17.11.1995; and 80 MT / Month of Acephate on 02.04.1996. Cost of the project is Rs 16.50 Crores.</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>		

A → SPECIFIC CONDITIONS

1	<p>Gaseous emissions (SO₂, NO_x, HCl, HC, NH₃, H₂S Cl₂) and PM from various process units to be conform to standards. At no time, emissions to go beyond standards. In case of failure of pollution control systems, unit should not be restarted until the systems are rectified to achieve desired efficiency</p>	<p>Complied.</p> <p>For all parameters monitoring is done through internally by our lab and externally through M/s Mahabal Enviro Engineering Pvt Ltd</p>
2	<p>Fugitive emissions in workplace environment, product, raw material storage areas, to be monitored. Fugitive emissions containing solvent from process and storage tank vents and accidental leakage of EM and TBM to be subjected to thermal destruction in fume incinerator. Flue gas emissions from incinerator to conform to the standards prescribed by GPCB</p>	<p>Complied.</p> <p>Fugitive emission monitoring at various locations are being carried out by our Quality Assurance Department and data being maintained.</p> <p>Fume incinerator is in operation</p>

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3	Process emissions (H ₂ S, NH ₃ , MECL, and VOC) to be scrubbed through ventury and packed column scrubbers and conform to prescribed standards. The efficiency of scrubber to be improved and maintained as per best practicable technology. VOC data to be monitored and submitted to the Ministry	Complied. VOC Monitoring is done

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4	<p>As reflected in EIA / EMP Report, effluent generation not to exceed 218 m³ / day. To reduce organic load, various effluent streams to be segregated and following treatment system to be followed;</p> <p>⇒ Organic waste water streams generated from process, low boilers and distillation residues generated from process, which are organic in nature, to be collected separately and incinerated</p> <p>⇒ Effluent stream containing high dissolved solids before discharging in solar evaporation pond having an area of 4000 sq m, to be treated suitably. Solvents from effluent to be recovered before discharging in solar evaporation pond. Besides, as reflected in EIA / EMP Report, aqueous stream containing high dissolved solid to be evaporated by installation of forced evaporation system with the help of steam</p> <p>⇒ Streams with high organic load (high COD and BOD) to be treated chemically with Hydrogen Peroxide and sent to ETP for treatment</p> <p>⇒ Dilute waste streams generated from process, utilities including blow downs of cooling towers and boilers, and waste water from softening plant and domestic waste water to be given primary, secondary and tertiary treatment. Treated effluent after conforming the standards, to be discharged in GIDC drain. The effluent quality before disposal to Amla Khadi, to be as follows;</p> <p>⇒ PH @ 5.5 to 8.5</p> <p>⇒ BOD @ 30 mg / l</p> <p>⇒ COD @ 100 mg / l</p> <p>⇒ SS @ 100 mg / l</p>	<p>Complied.</p> <p>Complied.</p> <p>Organic waste and Aqueous waste is being sent to common Incinerator, BEIL, Ankleshwar for incineration.</p> <p>Complied.</p> <p>Four Reactors of forced evaporator are in operation. About 40 kl / day can be evaporated in this system.</p> <p>Complied.</p> <p>In the chemical treatment section, effluent having high COD is treated with Hydrogen Peroxide. The treated effluent is further treated at ETP.</p> <p>Complied.</p> <p>Primary, secondary and tertiary treatment facilities are in operation. Company is sending treated effluent through GIDC drain to FETP, BEAIL, Ankleshwar for further treatment & disposal to deep sea.</p>

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	<p>⇒ Oil and Grease @ 10 mg / l</p> <p>⇒ Phenol @ 1 mg / l</p> <p>⇒ Sulphide @ 0.5 mg / l</p>	
5	Company to recover MECL (CH ₃ CL) by installation of CH ₃ CL recovery plant. Further, 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 incinerated. Action plan to be submitted to Ministry within 3 months	<p>Complied.</p> <p>The Company has not manufactured Dichlorovos (one of products) at the site, which is major generator of MECL.</p>
6	Company to upgrade existing incinerator for incineration of hazardous waste. Organic aqueous and solid waste generated should be collected and incinerated for total destruction. As reflected in EIA / EMP Report, solid waste and ash to be stored in the plant premises in a pit with impervious flooring and leachate collection system. The ash and sludge from ETP to be finally disposed in BEIL landfill. Leachate to be sent to ETP for treatment	<p>Complied.</p> <p>Our Incinerator is dismantled.</p> <p>Company is utilizing Common Incinerator facility of BEIL, Ankleshwar.</p> <p>ETP sludge is being disposed to BEIL for landfilling. Leachate is taken to ETP for further treatment.</p>
7	As per commitment given to Ministry, existing incineration system to be up graded by 31.03.2004. Company to also take membership of Common Incineration System of BEIL	<p>Complied.</p> <p>The Company has taken membership of the Common Incineration System being set up at BEIL. The company is sending incinerable material to BEIL, Ankleshwar for Incineration.</p>

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8	Destruction efficiency of incinerator to be assessed by agency like CPCB and report submitted. Company to monitor VOC's and data submitted to Ministry / CPCB / GPCB regularly.	Complied. The Company has taken membership of the Common Incineration System set up at BEIL, Ankleshwar. The company has started sending incinerable material to BEIL, Ankleshwar
9	As per CREP, bio assay test method 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 to Ministry	Complied.
10	As per action plan submitted to Ministry, Company to adopt waste minimization and cleaner production techniques to reduce solvent, raw material, water and energy consumption. Company to install modified P ₂ S ₅ handling system with tote bins to prevent spillages. To reduce decontamination and disposal, company to recycle the drums	Complied. This is an on going activity. <ul style="list-style-type: none"> • Drums recycling for FG packing in Plants. • Steam condensate is recycled in to Boilers. • We have reduced the raw material consumption norms. • We have increased Solvent recovery upto 96%.

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11	Company to undertake rain water harvesting as per action plan submitted to this Ministry	Complied. The rain water harvesting system consists of collection of rain water from the total surface area of approximately 1400 Sq M. The total rain water collection (considering 24" rain fall) comes to 840 kl in a year. The collected rain water is used in cooling tower make up. Also, part of the rain water collected is taken to storage tanks. The storage tank capacity is 650 kl.
12	Company to comply with environmental protection measures and safeguards recommended in EIA / EMP / RRA Reports as well as recommendations of Public Hearing Panel	Complied.
13	Green belt of adequate width and density in project area of 1200 sq m in addition to 7642 sq m to be provided to mitigate effect of fugitive emissions all around plant. Development of green belt along boundary wall, open space and avenue roads, to be improved in consultation with local DFO as per CPCB guidelines	Complied. This is an ongoing activity. During July to December-2010, about 600 nos saplings have been planted

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14	As per policy decision taken by this Ministry, Company to earmark a separate fund @ 1 % of project cost (Rs 16.50 Crores) for eco development measures including community welfare measures in project area. Amount to be deposited within 2 months in a separate account to be maintained by GPCB. Plans to be submitted to Ministry and GPCB within 3 months. After approval of action plan by GPCB, amount deposited may be released in two installments based on progress of implementation	Complied. We have submitted details to GPCB as we have already spent more than Rs 16.50 Lacs for eco development and other community welfare schemes.
<u>B → GENERAL CONDITIONS</u>		
1	Company to adhere to stipulations made by GPCB	Complied.
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	Complied. We have obtained Environmental Clearance # F. No. J-11011/1281/2007-IA(II) dated 15.04. 2008 for proposed expansion of pesticide and Intermediate Products.
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. The company is having various statutory licenses and approvals

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4	Company to comply with HWM Rules and authorization from GPCB to be obtained	Complied. The unit was granted CCA vide no. 32225 dated 13.05.2009 & dated 13.10.2010 which was valid up to 01.09.2013.
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. Being monitored and found to be within limits Monitoring is done internally

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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 employee to be maintained.	<p>Complied.</p> <p>The company is having full time medical doctor and also OHC. Pre employment and routine medical examinations are being carried out. Regular BCA test for employees is also being carried out. All medical records are being maintained.</p> <p>Every two years, complete medical examination is carried out. The frequency of check up is as follows;</p> <ul style="list-style-type: none"> ● Blood Cholinesterase Activity (BCA) Test is carried out every 15 days ● Brief Medical examination is done half yearly for blood, urine etc ● Full medical examination is done every alternate year including Physical examination, Hemoglobin ,Complete Blood Count, ESR, Complete Urine Examination, Lever Function, Kidney Function, Creatinine, Blood Sugar, Electro Cardiogram, X Ray for chest and Sonography etc <p>During the period July to Dec- 2010 Medical check up done for 126 nos employees.</p>

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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. Environmental Cell is in operation. VP (Env) from Corporate Level supports the units in environmental compliances. The various environmental protection measures are coordinated by a Sr. Manager. Waste water analysis, bio assay test, ambient air monitoring, stack monitoring, solid waste analysis, noise level monitoring, VOC Monitoring are carried out. Also, environmental audit is being carried out
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 a 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	Being complied. Half yearly reports is being sent during first week of February and August every year
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. Advertisements were given in two news papers and copy submitted to MOEF

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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. Since this is an ex post-facto Environmental Clearance for an existing unit, this conditions is not applicable.
-	Ministry may revoke or suspend the clearance, if implementation of any of the conditions is not satisfactory	Noted
-	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