

# CCAL

## CHEMFAB ALKALIS LIMITED

CCAL/MOEF&amp;CC/J-019/2022

20.12.2022

The Deputy Director-General of Forests (C),  
Ministry of Environment, Forest and Climate Change,  
Regional Office (SEZ), I and II Floor,  
Handloom Export Promotion Council,  
34, Cathedral Road,  
Nungambakkam,  
Chennai - 600034.

Dear Sir,

**Sub : Submission of a six-monthly monitoring report for the period Mar-Aug 2022.**

**Ref : Ministry of Environment, Forest and Climate Change (IA-II Section) Clearance vide F.No: J-11011/371/2017-IA II (I) dated: 27<sup>th</sup> August 2020.**

We are pleased to attach herewith our compliance report for the specific and general conditions mentioned in the Ministry of Environment, Forest and Climate Change (IA - II Section) Clearance vide F.No: J-11011/371/2017-IA II (I) dated: 27<sup>th</sup> August 2020.

Kindly acknowledge the receipt.

Thanking you,

Yours truly,

**For CHEMFAB ALKALIS LIMITED**

  
**V.R. Raguraman**  
**Vice President - Corporate**

Encl: As above.

**Copy to: Puducherry Pollution Control Committee**

Certificate No. OHS 66228 / EMS 71746  
An OHSAS 18001 and ISO 14001 Certified Company

CIN No.: L24290TN2009PLC071563

**Member - Dr. Rao's Group of Companies**

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**Responsible Care®**  
OUR COMMITMENT TO SUSTAINABILITY

Sl. No.	Condition	Compliance
(i)	All the conditions / recommendations stipulated in the Ministry's CRZ clearance dated 2 <sup>nd</sup> March, 2020 and Puducherry SCZMA letter dated 27 <sup>th</sup> September, 2019 shall be strictly followed.	Being followed
(ii)	The project proponent shall ensure 75% recycling and reuse of treated water. As approved by the Puducherry CZMA and as per the CRZ clearance, the project proponent shall not discharge more than 700KLD of rejects which include RO rejects and treated effluent from process.	Will adhere to
(iii)	The project proponent shall use solar power for meeting at least 5 MW of power requirements.	10 MW Solar power plant was installed and commissioned on 24.03.2021 and started utilizing the power generated from this unit for plant operation. In addition we have installed 220 KW rooftop solar panels and the energy generated is being used for plant operation.
(iv)	Volatile organic compounds (VOCs) / Fugitive emissions shall be controlled at 99.95% with effective chillers / modern technology. The gaseous emissions shall be dispersed through stack of adequate height as per CPVB / SPCB guidelines.	Fugitive emissions are controlled with Fully Enclosed Negative Pressure System installed at Chlorine liquefaction, Chlorine storage and Chlorine filling sections.
(v)	Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c)	No solvents are used in the process. Hence not applicable.

	<p>Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.</p>	
(vi)	<p>Total freshwater requirement shall not exceed 986 cum / day, proposed to from Seawater Desalination plant / Treated sewage water (PWD) RO Plant. The unit shall be permitted to draw 490 cum/ day from the existing open / dug wells, during emergency, after obtaining necessary permissions from the concerned authorities / CGWA.</p>	<p>We are strictly adhering to the conditions and for additional water requirement over and above 490 KLD, we are consuming STEW being transported from STP, Karuvadikuppam by road. PWD has initiated the process of laying pipeline for the supply.</p>
(vii)	<p>Process effluent / any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system. All the vent pipes should be above the roof level.</p>	<p>Being followed strictly.</p>
(viii)	<p>Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys, etc. flame arresters shall be provided on tank farm, and solvent transfer through pumps. Raw material and products should be stored in leak proof containers. Spent acid to be stored over the ground tank and to be sent to TSDF.</p>	<p>As stipulated by PPCC in their Authorization for Hazardous waste, used oil being stored in carboys under lock and key in a closed room</p>
(ix)	<p>Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP Sludge, process inorganic &amp; evaporation salt</p>	<p>No organic chemicals are used in the process. Hence not applicable</p>

	shall be disposed off to the TSDF.	
(x)	The Project Proponent shall undertake waste minimization measures as below: (a) Metering and control of quantities of active ingredients to minimize waste (b) Reuse of by products from the process as raw materials or as raw material substitutes in other processes, (c) Use of automated filling to minimize spillage, (d) Use of close Feed system into batch reactors, € Venting equipment through vapour recovery system, (f) Use of high pressure hoses for equipment clearing to reduce waste water generation.	Wastewater generated in the process is being re-used and recycled after treatment. Obtained CTO for converting solid waste (brine mud) on 13.07.2021. Pilot plant is in operation and the brick manufactured are being used in house.
(xi)	The green belt of at least 5 – 10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along roadsides etc., selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.	67% of the project area is covered with green belt.
(xii)	As proposed Rs. 2.1208 crore shall be allocated towards Corporate Environment Responsibility (CER). As proposed, the CER allocation shall be spent mainly for addressing the issues in the study area, including drinking water facility for villages / schools, educational/ infrastructural assistance in school/ university, skill development, plantation, solar lights, etc. preference shall be given to local villagers for employment in the unit.	We have already undertaken project pertaining to rejuvenation of Village Tanks, Educational assistance, and promotion of Miyawaki Foresting. We will continue to work on CER initiatives.
(xiii)	The unit shall make the arrangement for protection of possible fire hazards during	Full-fledged overhead fire hydrant

	manufacturing process in material handling. Firefighting system shall be as per the norms.	system is available.
(xiv)	All the safety and risk management suggested during the advanced study shall be implemented.	Noted
(xv)	Continuous online (24 x 7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. Proper effluent monitoring shall be done for the quality and quantity send for mine disposal.	Online continuous emission monitoring system (OCEMS) installed for measuring process stack emission and effluent discharge quantity and quality parameters, and the data being transmitted to CPCB and PPCC servers.

### 13.1 General Conditions:

(i)	No further expansion or modification in the plant, other than mentioned in the EIA Notification, 2006, and its amendments, shall be carried out without prior approval for the Ministry of Environment, Forest and Climate Change. 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.	Will ensure.
(ii)	The energy source for lighting purpose shall be preferably LED based, or advance having preference in energy conservation and environment betterment.	Overall, 78% lights were converted to LED in the as of March-2022. Remaining 22% replacement planned during financial year 2022-23.
(iii)	The locations of ambient air quality monitoring stations hall be decided in	Ambient air quality monitoring stations are finalized in

	consultation with the State Pollution Control Board (SPCB) and it shall be ensure that at least one station each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	consultation with PPCC always.
(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 hall conforms to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz 75 dBA (day time) and 70 dBA (night time).	Being maintained and monitored.
(v)	The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and to utilize the same for process requirements.	Implemented.  Total quantity of rainwater harvested per year 187643.9736 Cubic meter.  Total quantity of rainwater harvesting provision per day is 514.09 Cubic meter.  Total quantity of rainwater collection pits 94 Nos. collection well 3 Nos & Check dams 2 Nos.
(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.	We have exclusive Safety Department, who will be training our employees continuously on all safety requirements. Periodic medical examinations and health awareness camps are being conducted for the benefit of our employees.
(vii)	The Company shall also comply with all the environmental protection measures and safeguards proposed in the documents	Complied with

	submitted to the Ministry.	
(viii)	The Company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented.	Please refer point no. xii above.
(ix)	The Company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	The unit was established in the year 1985, since then we are contributing for the socio-economic upgradation of the society. We are aiding 8-10 surrounding villages /kuppams regularly through the respective Village Panchayats apart from supporting Government in their welfare activities.
(x)	A separate Environmental Management Cell (having qualified person with Environmental Science / Environmental Engineering / specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	A separate Environmental Management Cell has been set up and is equipped with full-fledged laboratory facility.
(xi)	The Company shall earmark sufficient funds to wards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management / pollution control measures shall not be diverted for any other purpose.	Provided.
(xii)	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, ZillaParishad / Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions /	The communication w.r.t the clearance has been passed on to all stake holders including advertisement in local dailies.

	representations, if any, were received while processing the proposal.	
(xiii)	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF & CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and Six monthly compliance status report shall be posted on the website of the Company.	Yes, will strictly adhere to the condition.
(xiv)	The environmental statement for each financial year ending 31 <sup>st</sup> March in Form - V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the Company along with the status compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by email.	Environment Statement ending 31 <sup>st</sup> March 2022 was submitted to PPCC on 26.09.2022.
(xv)	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 and at <a href="http://parivesh.nic.in/">http://parivesh.nic.in/</a> . this shall be advertised within seven days from the date of issue of 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	Complied. Also, the information is uploaded in the company's web site: <a href="http://chemfabalkalis.com">http://chemfabalkalis.com</a>

	forwarded to the concerned Regional Office of the Ministry.	
(xvi)	The project authorities shall inform the Regional Office as well as the Ministry, the date of final closure and final approval of the project by the concerned authorities and the date of start of the project.	Noted. CTO for the partial enhancement of capacity to 155 TPD from 125 TPD was obtained on 08.04.2021. Application for CTO for further expansion to 180 TPD was submitted online through OCMS portal to PPCC on 19.01.2022.
(xvii)	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any , as may be applicable to this project.	Noted.