

Ref: CIL: KKD: EHS: 03:06:22

Date: 28.06.2022

Environmental Engineer
Andhra Pradesh Pollution Control Board
Plot No 2-2, Ramanayyapeta Industrial Area
Kakinada 533003

Dear sir,

Sub: Submission of Self Compliance CFE & CFO Six monthly compliance report - Reg.

Ref:

1. Consent & Hazardous waste Authorisation Order No: APPCB/VSP/RJY/285/HO/CTO/2021 Dated: 07.03.2023
2. CFE Order No: Order No: 65/APPCB/CFE/RO-VSP/HO/2012 Dated: 17.03.2019
3. CFE Order No: Order No: 65/APPCB/CFE/RO-VSP/HO/2021 Dated: 28.10.2021
4. CFE Order No: Order No: 65/APPCB/CFE/RO-VSP/HO/2010 Dated: 09.11.2022
5. EC Order No: No. J-11011/381/2006-IA-II(I) Dt: 11.05.2007
6. EC Order No: F.NO. J-11011/1303/2007-IA-II(I) Dt: 11.06.2008
7. EC Order No: F.NO. J-11011/158/2016-IA-II (I) Dt: 10.09.2016

With reference to the above subject, we are here with enclosing self-certified half yearly compliance status to the conditions specified in references (1), (2), (3), (4), (5), (6) & (7) for the months from Oct 2022 to March 2023. The status of compliance is being uploaded in the pcb.gov.in.

This is for your kind information and necessary records.

Thanking You,

Yours faithfully,

FOR COROMANDEL INTERNATIONAL LTD, Kakinada.

PV Rao
DGM - EHS





Encl: Condition wise Compliance Report along with Attachments

RECEIVED COVER
CONTENTS NOT KNOWN
B-6 3-06/23
A.P. POLLUTION CONTROL BOARD
KAKINADA



EC Condition Compliance

No. J-11011/381/2006-IA II(I) dated: 11-05-2007.



Expansion Project of NPK Grade Fertilizers.

	Environment Compliance report to the Terms and Conditions issued by MoEF for capacity enhancement of NPK fertilizer	
	No. J-11011/381/2006-IA-II(I) Dt: 11.05.2007	
	Six Monthly (i.e., October 2022 - March 2023) Compliance Report	



Sl. No.	Condition	Status of Compliance																
1.	The Provision to manufacture four grades of NPK will be there but only one product will be manufactured at any given point of time and production of C train product will not exceeds 4.25 lakhs MTPA.	<p>Complied., Obtained Permission from APPCB to produce 20.5 Lakh tons per Annum for all three trains A, B & C, vide Consent Order No: APPCB/ VSP/ RJY/ 285/HO/CTO/2021 Dated: 07.03.2023 Valid up to 30.09.2026. CTO Copy is enclosed in <u>Annexure I</u>. The details of production for the last six months are here with</p> <table><tr><th>Month</th><th>Total Qty (in MT)</th><th>Month</th><th>Total Qty (in MT)</th></tr><tr><td>Oct-22</td><td>176044</td><td>Jan-23</td><td>200151</td></tr><tr><td>Nov-22</td><td>200100</td><td>Feb-23</td><td>144724</td></tr><tr><td>Dec-22</td><td>187209</td><td>Mar-23</td><td>75771</td></tr></table> <p>Total Qty: 9,83,999 MT</p>	Month	Total Qty (in MT)	Month	Total Qty (in MT)	Oct-22	176044	Jan-23	200151	Nov-22	200100	Feb-23	144724	Dec-22	187209	Mar-23	75771
Month	Total Qty (in MT)	Month	Total Qty (in MT)															
Oct-22	176044	Jan-23	200151															
Nov-22	200100	Feb-23	144724															
Dec-22	187209	Mar-23	75771															
2.	The gaseous emissions (SO ₂ , NO _x , NH ₃ , HC, VOC & Fluoride) matter from various process units shall conform to the prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. The stack height shall be as per the CPCB guidelines. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiently. Further, the company shall interlock the production system with the pollution control devices.	<p>Complied.,</p> <ul style="list-style-type: none">- A wet Scrubbing system is in place to ensure that the emissions generated from the process are treated and emissions to meet the standards prescribed by the board. <u>Enclosed photographs of the scrubbing system in Annexure II</u>- Online Emission Monitoring system (OCEMS) is in place for continuously monitoring the emissions generated from the process stacks.- Regular Third-Party Monitoring is being done & submitted to the APPCB, Regional Office. The average stack emissions for the last six months from the third-party analysis report are furnished below: PM: 53.23 mg/Nm³; Ammonia:74.16 mg/Nm³ Total Fluorine: 1.42 mg/Nm³. <u>Enclosed Analysis Reports of process stacks in Annexure III</u>- Necessary interlocks were envisaged to cut off the feeds in case of failure of pollution control devices.																
3.	To limit various pollutants within the prescribed limits, multiple scrubbing systems along with a stack of 50 m will be provided. The stack height of DG sets will be 13 m.	<p>Complied.,</p> <ul style="list-style-type: none">- Wet Scrubbing system is in place to ensure that the emissions generated from the process to meet the prescribed standards by the board. The total height of the stack in C Train is 62 mts.- 2 No's of DG Sets (2x1000KVA) are available in the plant for use in case of the emergency situations. The height of the DG stack is above 15 mts.																
4.	Additional ambient air quality monitoring stations shall be set up, if required, in consultation with the MPCB.	<p>Complied.,</p> <p>3 Nos., of online AAQ monitoring systems were provided and the stations have been connected to APPCB Server as per the statutory requirement. <u>Enclosed CAAQM Station photos in Annexure IV</u></p>																
5.	The fugitive emission in the work zone environment, product, raw material storage	<p>Complied.,</p> <p>Fugitive emissions monitoring is being carried out on</p>																

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	area shall be regularly monitored and data shall be submitted to the concerned authorities. The emissions shall be controlled and conform to the limits prescribed by the CPCB in future.	quarterly basis in work zone environment for SPM. All the internal roads are concreted to prevent the dust emissions generated from the roads and the raw materials are stored in the sheds to prevent the dust emissions generated from the storage area. <u>Enclosed photographs of the Raw Material Storage Sheds in Annexure V along with Fugitive Analysis reports</u>																
6.	Total water requirement shall not exceed 1270 KLD as per the permission accorded by the State Irrigation Department.	Complied., Total Water Requirement for the entire plant is 1685 KLD (which includes the Enhancement of Complex fertilizer Plant Capacity for which EC clearance taken in 11.06.2008). Permission was taken in CFO Order also. The details of Water consumption for the month wise is as follows: <table><tr><th>Month</th><th>Total Qty in KL</th><th>Month</th><th>Total Qty in KL</th></tr><tr><td>Oct-22</td><td>43408</td><td>Jan-23</td><td>48218</td></tr><tr><td>Nov-22</td><td>49382</td><td>Feb-23</td><td>42211</td></tr><tr><td>Dec-22</td><td>49249</td><td>Mar-23</td><td>30662</td></tr></table> Avg Consumption - is 1446 KLD (for the past 6 months i.e. 182 days)	Month	Total Qty in KL	Month	Total Qty in KL	Oct-22	43408	Jan-23	48218	Nov-22	49382	Feb-23	42211	Dec-22	49249	Mar-23	30662
Month	Total Qty in KL	Month	Total Qty in KL															
Oct-22	43408	Jan-23	48218															
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Dec-22	49249	Mar-23	30662															
7.	There shall be no discharge of waste water from the unit. The effluent shall be treated in the augmented Effluent Treatment Plant (ETP) and shall be reused in the process and for Green Belt development.	Complied., - The plant is designed on basis of Zero effluent discharge. The scrubber liquor spills will be collected in a sump and recycled back to system. - PTZ Camera and online effluent water usage is in place and the same was connected to the CPCB / SPCB office. <u>Enclosed photographs of the central Sump & PTZ camera in Annexure VI</u> Domestic water is being treated in the STP and treated water is used for greenbelt development. <u>Enclosed photographs of the Sewage Treatment Plant- in Annexure VII</u>																
8.	The company shall undertake following Waste Minimization measures:	Complied., Company was Certified for ISO 14001 and taken all steps for waste minimization of Raw materials, Lubricants and utilities.																
	➤ Metering and control of qualities of active ingredients to minimize waste.	Electronic weigh feeders and a metering system provided for raw materials.																
	➤ Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.	- No bye product from the process. - The spillage and off grade product will be used again in the process.																
	➤ Use of automated filling to minimize spillage.	Bin weighers are provided with indications and alarms for automated filling to minimize the spillages.																
	➤ Use of “Close Feed” systems.	Closed feed systems is in place.																

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	➤ Venting equipment through vapor recovery Systems.	The safety valve outlets are connected to scrubbing system.
	➤ Use of high pressures hoses for equipment clearing to reduce wastewater generation.	Implemented
9.	No solid waste will be generated from the expansion process. Used Oil and Batteries shall be sold to authorised reprocessors.	Complied., - Hazardous Waste shed is available under the Materials Department to store the Used Oil generated in the plant premises. <u>Enclosed photographs of Hazardous Waste Storage Shed in Annexure VIII</u> - Used Oil of 3000 litres was disposed in the month of September 22 to the authorised reprocessors and the same submitted to APPCB board office vide our Ltr Ref No: CIL:EHS: 03:10:22:01 dated 11.10.2022. - All the used Batteries generated is being disposed to the authorised vendor / buy back basis to the supplier. Latest Form VIII, the half yearly return is submitted to APPCB board office vide our Ltr Ref No: CIL:EHS: 03:12:23:01 dated 27.04.2023.
10.	All safety precautions, as submitted to Ministry shall be installed and undertaken.	Noted and will be complied with.
11.	The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October, 1994 and January, 2000 and Hazardous Wastes (Management and Handling) Rules, 2003 along with the Emergency Preparedness Rules. Authorization from the State Pollution Control Board must be obtained for collection/treatment/storage/disposal of hazardous wastes, if any.	Complied., - Dyke walls are constructed for the Storage tanks of Ammonia, Sulphuric Acid and Phosphoric Acid. - Ammonia detectors are provided at 52 locations for monitoring the Ammonia content in atmosphere. - Natural Gas Detectors are provided at 11 locations for monitoring the Natural Gas content in the atmosphere. - Onsite Emergency plan was developed to meet the Emergencies. - Mock Drills were conducted for every three months. Last Mock drill was conducted on 11.11.2022 and a report for the same was submitted to boards office vide Ref No: CK: EHS:3.1.12 Dated: 01.12.2022 - The Company has also implemented Process Safety Management System (PSMS) on voluntary basis. - Obtained combined order i.e., CFO & HWA from APPCB. (Consent Order No: APPCB/ VSP/ RJY/ 285/HO/CTO/2021 Dated: 07.03.2023 Valid up to 30.09.2026)
12.	The Company shall strictly follow all the recommendations mentioned in the Charter on Corporate Responsibility for Environmental Protection (CREP).	Complied., The Charter on Corporate Responsibility points are complied with. <u>Enclosed the status of compliances in Annexure IX</u>
13.	The company must harvest surface as well as rainwater from the rooftops of the buildings proposed in the expansion project and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Complied., As the ground water table is very high as the plant location is very near to the sea, construction of rain water harvesting is difficult. However, two rain water harvesting structures are constructed at Technical Building & Bagging Plant.

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		In addition to that we have a large water storage collection pond to collect the water during the rains. <u>Enclosed the photographs of the Collection Pond in Annexure X.</u>
14.	Occupational Health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Complied., We have an Occupational Health Centre and regular health check-ups are being carried out as per the statute and records are being maintained as per the Factories Act.

GENERAL CONDITIONS

1.	The Project authorities must strictly adhere to the stipulations made by the Andhra Pradesh Pollution Control Board (APPCB) and the State Government.	Complied with All the directions issued by the board offices in CFE & CFO are being followed without any deviations.
2.	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.	Noted.
3.	Adequate number of influent and effluent quality monitoring stations shall be set up in consultation with the APPCB, Regular monitoring shall be carried out for relevant parameters.	Noted., & Complied As the plant is designed for Zero effluent discharge. There will not be any effluents generated from the process. Any washings, spills if any is collected in a separate sump at respective trans and reused back to process. PTZ cameras and Data Analogers for Flow meters were provided and connected to APPCB Server. <u>Enclosed the Photographs of the Central Sump & PTZ Camera in Annexure VII</u>
4.	The project proponent shall also comply with all the environmental protection measures and safeguards proposed in the EIA/EMP report.	Complied., All measures were taken to safeguard the environment as specified in EMP.
5.	Industrial waste water shall be properly collected and treated so as to conform to the standards prescribed under GSR 422 dated 19 th May, 1993 and 31 st December, 1993 or as amended from time to time. The treated wastewater shall be utilized for plantation purpose.	Complied., <ul style="list-style-type: none"> - There will not be any effluent generation from the process plants as the system is designed for Zero Discharge System. The process washings, spills if any is being collected in the collection sumps at respective trains and reused back into the process. - The wastewater generated from cooling tower and boiler is pumped back to the plant to reuse in the process. - The domestic water is sent to the STP and the treated water is being used to the Green belt. <u>Enclosed the Photographs of the Central Sump & PTZ Camera in Annexure VII & STP in Annexure VIII</u>
6.	The overall noise levels in and around the plant area shall be limited within the prescribed standards (85 dBA) by providing noise control	Complied., The noise levels are monitored in and around the plant on monthly basis by NABL & MoEFCC approved

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	measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation.	third party lab and the same reports are being submitted to APPCB, RO, Kakinada. <u>Enclosed the Noise Monitoring Reports in Annexure XI</u>
7.	Proper House keeping and adequate occupational health programmes shall be taken up. Regular Occupational Health Surveillance Programme shall be carried and records shall be maintained properly for at least 30-40 years. The Programme shall include lung function and sputum tests once in six months. Sufficient preventive measures shall be adopted to avoid direct exposure to dust etc.	Complied., <ul style="list-style-type: none"> - Dedicated Housekeeping and specialized cleaning personnel were engaged in the plant to maintain good housekeeping. - PPE was issued to all personnel working in the plant. - Regular health Surveillance Programmes are being carried out as per the statute and records are being maintained as per the Factories Act.
8.	A separate Environment Management cell with full fledge laboratory facilities to carry out various management and monitoring functions shall be set up under the control of a Senior Executive.	Complied., Coromandel is having full-fledged laboratory attached to Quality Assurance Department, which is having the infrastructure to carry out environmental related parameters in-addition to the periodical MOEF approved third party monitoring.
9.	As proposed in the EIA/EMP, Rs. 0.11 Crores and Rs. 0.52 Crores/annum shall be earmarked to meet the capital cost and recurring cost / annum for the environmental protection measures shall be used judiciously to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government. The funds so provided shall not be diverted for any other purpose.	Complied., Adequate funds are provided in Capital and Revenue Budget.
10.	The company shall undertake welfare measures and community development measures for the local people in the vicinity of the project area.	Complied., The Company is being undertaken welfare measures and community development measures for the local people in the vicinity of the project area. Sufficient funds have been allocated under CSR activity.
11.	Regional office of this Ministry at Bangalore / Andhra Pradesh Pollution Control Board / Central Pollution Control Board shall monitor the implementation of the stipulated conditions. Six monthly compliance status report and monitoring data along with statistical interpretation shall be submitted to them regularly.	Complied., Six monthly compliance reports are being submitted as per the statutory requirements. Last submitted on 28.11.2022
12.	The Project proponent should advertise in at least two local newspapers widely circulated in the region around the project, one of which shall be in the vernacular language of the locality concerned informing that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the Andhra Pradesh Pollution Control Board / Committee and may also be seen at Website of the Ministry at	Complied., Notification was published on 17 th May, 2007 in local news papers Vaartha and Hindu in local language and in English respectively. Copy of the same was sent to Additional Director, MOEF, Bangalore and Regional Office, APPCB, Kakinada vide our letter No. GFK: SHE:3.1:07 Dt: 17.05.2007.

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	http://envfor.nic.in . The advertisement should be made within seven days from the date of issue of the clearance letter and a copy of the same should be forwarded to the Ministry's Regional Office at Bangalore.	
13.	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 land development work.	Complied., Project approved by MoEF in May 2007. Work started in January, 2011 and completed by March, 2013. Subsequent approvals from the APPCB are being taken during the consent renewals.