

Minutes of the 117th SEAC Meeting held on 28th July 2018

117-F. 6439/2017	<p>Proposed capacity expansion of Water based Latex Polymer & Latex Polymer cake in their existing Emulsion Plant of M/s. The Dow Chemical International Private Limited located at Plot No.L-7,SIPCOT Industrial Park (Phase II), Mambakkam Post, Sriperumbudur Village, Kancheepuram District, Tamilnadu – Category “B1”- under item No. 5 (f) of the Schedule of EIA Notification 2006 ‘Synthetic Organic chemicals Industry’ – Environmental Clearance - Regarding</p>
	<p>A Consent to Establish Water based Latex Polymer & Latex Polymer cake in their existing Emulsion Plant in the name of M/s. ROHM and HARS India Private Limited was issued vide proceeding dated: 05.06.2006. Subsequently, the proponent has obtained Consent to Operate vide proceedings dated: 07.09.2007 for the Water Based Latex Polymer and Latex Polymer Cake from TNPCB.</p> <p>In 2016, the name of the company has been changed from M/s. ROHM and HARS India Private Limited to M/s. Dow Chemicals International Private Limited.</p> <p>The project proponent has applied for ToR on 21.08.2017 for the proposed capacity expansion of Water based Latex Polymer from 40000 MT/Year to 70000 MT/Year & Latex Polymer cake from 407 MT/Year to 1462 MT/Year and the subject was placed in the 94th SEAC Meeting held on 08.09.2017. Subsequently, the matter was placed in the 241st SEIAA Meeting held on 09.10.2017. Both the Committee and the Authority decided to recommend for ToR subject to applicability of EIA Notification, S.O. 60 (E), dated: 27.01.1994 for the project vide Lr.No. SEIAA-TN/F.No. 6439/2017/5(f)/SOC/ToR- 291/2017 dated: 09.10.2017.</p> <p>Now, M/s. The Dow Chemical International Private Limited has applied for Environment Clearance by submitting the EIA report for the Proposed capacity expansion on 08.12.2017.</p> <p>The application was scrutinized and additional details were requested vide letter dated: 18.01.2018 and the project proponent has submitted the details on 31.01.2018.</p> <p>The project proposal was placed in the 102nd meeting of the SEAC held on</p>

Member-Secretary, SEAC

1


Chairman, SEAC

Minutes of the 117th SEAC Meeting held on 28th July 2018

01.02.2018. The proponent also made a presentation about the salient features of the project proposal. The SEAC Members interacted with the proponent regarding the regulatory aspects and environmental aspects related to the project.

1. From regulatory point of view, the SEAC members noted that as per EIA Notification, S.O. 60 (E), dated: 27.01.1994, the project requires Environmental Clearance. As per the Schedule – I, integrated paint complex including manufacture of resins and basic raw materials required in the manufacture of paints will require EC. When this was pointed out to the proponent, the proponent was of the opinion that his project does not require EC according to his interpretation of the rule.
2. The salient features of the project are as follows:
 - a) Water based Latex polymer – 40000 (MT/year) & Latex Polymer Cake - 407 (MT/year)
 - b) For setting up the proposed expansion there will be no additional land purchased as adequate land is available at the existing facility.
3. The proponent informed that appropriate gaseous emission control, effluent treatment and hazardous waste management measures will be implemented.

The SEAC felt that it is better to make an on the spot inspection of the industry to assess the current status of the environmental compliance of the industry and then take a decision regarding their request for future expansion.

As per the order Lr.No.SEAC-TN/F.No. 6439/2017 dated: 01.02.2018 of the Chairman, SEAC, a Technical Team was constituted to inspect and study the field conditions in the proposed capacity expansion of Water based Latex Polymer & Latex Polymer cake by M/s. The Dow Chemical International Private Limited in their existing Emulsion Plant located at Plot No.L-7, SIPCOT Industrial Park (Phase II), Mambakkam Post, Sriperumbudur Village, Kancheepuram District on 10.02.2018.

The Technical Team made the inspection on 10.02.2018 and submitted

Minutes of the 117th SEAC Meeting held on 28th July 2018

the report on 19.02.2018. The report of the Technical team was placed in the 103rd meeting of SEAC held on 23.02.2018.

The SEAC noted that, during the inspection, the Technical Team has instructed the proponent to revise the EIA report to include various pollution control measures. The proponent has revised the EIA report and submitted the same to the SEAC on 23.02.2018.

Considering the inspection report and the revised EIA report of the proponent, the SEAC decided to recommend to SEIAA to consider the grant of EC to M/s. Dow Chemicals International Private Limited for the proposed capacity expansion of Water based Latex Polymer from 40000 MT/ Year to 70000 MT/Year & Latex Polymer cake from 407 MT/Year to 1462 MT/Year, subject to the fulfilment of the following conditions in addition to the normal conditions:

1. Due to the expansion of the industry, there will be increased air emission. At present the air emission (mainly monomers) is estimated to be 2860 kg/annum. After expansion this will increase to 4960 kg/annum. To manage the increased air emission, the proponent should implement the following additional air pollution control measures.
 - a) The scrubber column internal packing must be revamped by going for a combination of structured packing and random packing to improve the caustic scrubber efficiency to 80% from 60%.
 - b) Caustic circulation pump capacity must be increased from 17cu.m/hr to 25 cu.m/hr after checking the flooding conditions.
 - c) The forced draft caustic blower capacity must be increased from 170 cu.m/hr to 250 cu.m/hr by change of impeller / motor.
2. The ETP treats at present 79 KLD from process vessel and equipment flushing and 8 KLD from domestic use. Thus, the total flow into the ETP now is 87 KLD. This flow will increase to 147.5

Member-Secretary, SEAC

3


Chairman, SEAC

Minutes of the 117th SEAC Meeting held on 28th July 2018

KLD in future (138 + 9.5 KLD). Since the process effluent flow has almost doubled, the ETP capacity also needs to be doubled. Hence, the industry is directed to go for an additional ETP of similar configuration as it is existing now.

3. Regarding hazardous waste, the industry produces pump seal oil, expired raw materials, empty raw material drums, bag liners which are contaminated with chemical powders and ETP sludge. The total hazardous waste now generated is 296 T/annum which will increase to 525.25 T/annum after expansion. The future hazardous waste should also be managed as per the existing Hazardous Waste and Other Waste (Management) Rules, 2016.
4. The industry should install an additional VOC monitor at the ground floor in the process area and the data generated should be fed to the TNPCB CARE AIR CENTRE.
5. Only approved species should be planted following proper planting technique in future for green belt development:
 - i) Calophyllum inophyllum (Punnai)
 - ii) Derris indica (pungan)
 - iii) Ficus religiosa (Arassa Maram)
 - iv) Ficus bengalensis (Ala Maram)
 - v) Mimusops elangi (Magilan Maram)
 - vi) Syzygium cumini (Naaval)
 - vii) Azadirachta indica (Vempu)
 - viii) Thespesia populnea (Poovarasu)
6. Regarding the Occupational Health Services (OHS), the surgeon or medical officer appointed for the purpose shall be trained in OHS by the expertise in the respective fields. Besides, the documents related to periodical medical examination carried out shall be maintained in all aspects.
7. The plant safety committee shall be constituted if not done earlier, incorporating the members representing the management and workmen representing the different working areas to review the

Minutes of the 117th SEAC Meeting held on 28th July 2018

existence of the safety standards. Ensuring the safety standards on day to day basis must be carried out.

8. Safety audit shall be carried out for all the working places including the functional components as per norms and at least once in a year whichever is earlier. The same shall be considered as a basis for reviewing the safety standards during the plant safety committee meeting.
9. Regarding CSR activities, the technical team noted that the industry has spent Rs. 10.10 Lakhs for the 3 years (2014-2015, 2015-2016 & 2016-2017). As per the norms, for this period, an amount of Rs. 25.30 Lakhs should have been spent on CSR activities. Thus, the industry has to spend the balance Rs. 15.20 Lakhs (25.3 Lakhs – 10.10 Lakhs). The amount of Rs. 15.20 Lakhs should be deposited with SMC (SSA), PU Primary School, Mullandiram Village, Tiruvannamalai District, for the construction of compound wall, providing toilet facilities for the school children and for the procurement of school furniture, in the form of DD before the receipt of EC. The proof for having transferred the funds should be produced to SEIAA.


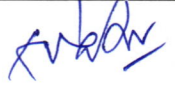

For the years 2017-2018 onwards, the industry has to spend at least Rs. 25 Lakhs per annum towards CSR activities as per the norms. The amount should be utilised only for infrastructure, useful for local communities for the cause of education and sports.

- 8 From regulatory point of view, the SEAC members noted that as per EIA Notification, S.O. 60 (E), dated: 27.01.1994, the project requires Environmental Clearance. As per the Schedule – I, “integrated paint complex including manufacture of resins and basic raw materials required in the manufacture of paints will require EC”. When this was pointed out to the proponent, the proponent was of the opinion that his project does not require EC according to his interpretation of the rule. This recommendation made by the SEAC is subject to the resolution of the point whether the EIA notification, 1994 was



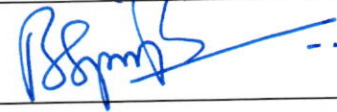
Member-Secretary, SEAC


Chairman, SEAC

Minutes of the 117th SEAC Meeting held on 28th July 2018

	<p>applicable in the case of this project in the year 2006 when the proponent planned to start the industry.</p> <p>The above recommendation of SEAC was placed in the 325th SEIAA Meeting held on 19.07.2018. The SEIAA decided to refer the proposal back to SEAC with the following remarks:</p> <ol style="list-style-type: none"> 1. The SEAC recommendation is not clear (obviously referring to the applicability of EIA Notification, 1994). 2. The proponent plea that there is no violation under Environment Impact Assessment notification, 1994, has not been supported by any documents. This needs to be examined appropriately by SEAC. <p>The project proposal along with SEIAA remarks were placed in the 117th SEAC Meeting held on 28.07.2018. The members of the SEAC discussed the matter and decided to offer the following response to the two points raised by SEIAA:</p> <p>As stated in the SEAC recommendation itself, the recommendation of the project for issue of EC was subject to the resolution of the point whether the EIA notification, 1994 was applicable for the project in 2006. The SEAC and the proponent had different opinion on this issue. Obviously, the MoEF & CC may be in a position to offer the final judgement on this issue. The statement which conveys the opinion of the proponent did not influence the decision of the SEAC and as part of the proceedings of the SEAC, this statement was included. The SEAC took an independent decision.</p>		
S.No	Name	Designation	Signature
1	Dr. K. Thanasekaran	Member	
2	Dr.K.Valivittan	Member	
3	Dr.Indumathi M. Nambi	Member	
4	Dr. G. S. Vijayalakshmi	Member	

Minutes of the 117th SEAC Meeting held on 28th July 2018

5	Dr. M. Jayaprakash	Member	
6	Shri V. Sivasubramanian	Member	
7	Shri V. Shanmugasundaram	Member	
8	Shri B. Sugirtharaj Koilpillai	Member	
9	Shri. P. Balamadeswaran	Co-opt Member	
10	Shri. M.S. Jayaram	Co-opt Member	

Member-Secretary, SEAC


Chairman, SEAC

Member-Secretary, SEAC

Chairman, SEAC