

Rama
Rama Phosphates Ltd.

FACTORY :
4807/11, UMRA JHAMARKOTRA ROAD,
TEHSIL GIRWA,
DISTT. UDAIPUR-313 901 (RAJASTHAN)

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FAX : 2342070
E-MAIL : rama.udaipur@ramagroup.co.in
CIN : L24110MH1984PLC033917

K To,
Dy. Director - MoEF
Regional office (Central Region)
Kendria Bhawan, 5th Floor,
Sector "H", Aliganj
Lucknow-226024

Date-29/08/2017

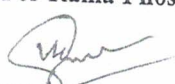
Sub: Regarding Compliance of Environment clearance issued for Expansion Project of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 30,00,00 TPA converted in Granular SSP), NPK (60,000 TPA) and additional Boronated SSP(25,000 TPA) and LABA(20,000 TPA) of M/s Rama Phosphate Ltd. At plot no.4807/11,jhamarkotra Road, Village -Umra, Tehsil -Girwa, Dist. Udaipur, (Rajasthan)

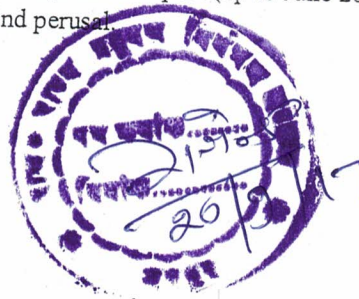
Ref: 1.Environmental Clearance issued vide F.No. J-11011/292/2011-IA II (I) dated 18/09/2014

Dear Sir,

In regards to the above, please find the enclosed six monthly Compliance Report (up to June 2017) of the conditions laid in the Environmental Clearance for your kind perusal.

Thank you
For Rama Phosphate Ltd


K.P. Sukthanker
General Manager(Works)



✓ CC to: - 1. Member Secretary, Rajasthan State Pollution Control Board, 4, Institutional Area, Jhalana Doongri, Jaipur- 302004

POSTAL ADDRESS : 1, New Vidhya Nagar, Hiran Magari, Sector - 4, UDAIPUR - 313002 (Rajasthan)

Project :Expansion Project of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 30,00,00 TPA converted in Granular SSP), NPK (60,000 TPA) and additional Boronated SSP(25,000 TPA) and LABA(20,000 TPA) **Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017**

Promoter : M/s Rama Phosphates Ltd

COMPLIANCE REPORT TO THE CONDITIONS LAID IN THE ENVIRONMENTAL CLEARANCE

PREAMBLE:

EIA follow up commonly referred to as Compliance reporting is the process of monitoring, evaluation and validation of the outcomes of EIA. It is followed by management and communication to the stakeholders. EIA Notification, 2006 (S. No. 1533) mandates the project management to submit the half yearly compliance in respect of the stipulated prior environmental clearance terms and conditions in hard and soft copies to the regulatory authority concerned, on 1st June and 1st December of each calendar year (Para 10, sub para (i) of said Notification).

Follow-up is internationally considered essential to determine the outcome of EIA through evaluating environmental performance of projects (*Marshall et al., 2005; Morrison-Saunders et al., 2007*). It is also termed as monitoring and auditing. EIA follow up relates to the construction as well as operational phase of the project. EIA follow-up is in place until the very end of the project's life cycle. It plays an important role in tracking the environmental performance of the project.

EIA follow-up comprises of four elements {*Art et al, 2010 (page 176)*} which are as follows:

1. Monitoring:

Monitoring compares data that has been collected in the assessment with the standards, predictions and expectations outlined prior to the project's commencement. Post project monitoring takes into consideration compliance to the guidelines set out and the effectiveness of the project. In some cases, multiple projects may be included in the monitoring process in order to compare effects and outcomes from various studies.

2. Evaluation:

Evaluation takes into account the findings of the project in relation to standards, pre-project predictions and expectations. It often includes scientific and technical policies.

3. Management:

Management is the act of responding to the issues which may arise from the monitoring

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Promoter : M/s Rama Phosphates Ltd

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

and evaluation processes. The role of management is undertaken by the parties including the proponent and the regulator.

4. **Communication:**

Communication is the act of informing project stakeholders and the general public about the results from the EIA follow-up. Again the proponent and the regulator may be involved in the communication process.

PROJECT INTRODUCTION:

Expansion Project of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 30,00,00 TPA converted in Granular SSP), NPK (60,000 TPA) and additional Boronated SSP(25,000 TPA) and LABA(20,000 TPA) of M/s Rama Phosphates Ltd., at Plot No. 4807/11, Jhamarkotra Road, Village Umra, Tehsil-Girwa, Dist.- Udaipur, Rajasthan. This project has been granted Environmental Clearance by MoEF&CC, Government of India vide letter no. J-11011/292/2011-IA II(I) dated 18th September 2014. Copy of environmental Clearance is enclosed as **Annexure I**.

PROJECT BRIEF:

Location : Plot No. 4807/11, Jhamarkotra Road, Village Umra, Tehsil-Girwa, Dist.- Udaipur, Rajasthan.

Plot Area : 73,200 sq. m

Capacity :

S.NO	Particulars	Capacity (TPA)		
		Existing	Proposed	Total
1	SSP	1,81,000	1,34,000	3,15,000
2	GSSP	66,000	2,34,000	3,00,000
3	NPK	60,000	--	60,000
4	Boronated SSP	--	25,000	25,000
5	LABSA	--	20,000	20,000

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Promoter : M/s Rama Phosphates Ltd

Water Demand : 313.5 KLD

Power Demand : 2550 kVA (Connected Load) Source: AVVNL

STP Capacity : 2 KLD

OBJECTIVES:

- To analyze the outcomes of EIA studies.
- To monitor the environmental data that has been collected in the assessment with the standards, predictions and expectations outlined prior to the projects' commencement.
- To evaluate taking into account the findings of the project in relation to standards, pre-project predictions and expectations.
- To establish the links between pre-project goals and targets and post project achievements.
- Control of project and environmental impacts.

METHODOLOGY:

1. Monitoring – Collection of Environmental data (one day) post project scenario during construction phase. The parameters include:
 - a. Ambient Air Monitoring
 - b. Ambient Noise levels at the project boundary
 - c. Ground water analysis
 - d. Soil analysisOther related information was collected during site visits as well as compliance of the conditions were monitored and recorded during site visits.
2. Evaluation – the appraisal of the conformance with standards, predictions or expectations as well as the environmental performance of the activity.

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Promoter : M/s Rama Phosphates Ltd

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

AGENCY:

The study has been carried out by:

Gaurang Environmental Solutions

501, Paris Point, Near Collectorate Circle, Banipark, Jaipur (Raj)

Contact: 0141-4029115

Email: gaurangenviro@gmail.com

Gaurang Environmental Solutions (GES) is formed with the vision of providing simplified and one point solutions for all the Environmental needs of the clients. GES provide multi disciplinary services offering unique portfolio of services ranging from planning & design of Environment, Health & Safety, Risk, Quality Systems, infrastructure & core sector and offers the most innovative and revised techniques in Hydrogeological investigations, Rain water harvesting techniques & its implementation, Ground and Surface water management, Water treatment services, etc.

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

COMPLIANCE OF THE CONDITIONS LAID IN THE ENVIRONMENTAL CLEARANCE

COMPLIANCE STATUS

PART A: SPECIFIC CONDITION

S. No.	Condition in EC	Compliance status
i.	Silicon Fluoride gases shall be passed through three stage-wet scrubbers before discharging into atmosphere through adequate stack height to control fluorine content with 15 mg/m ³ . After three stages, if fluorine content in emission is not meeting the prescribed norms then efficiency of scrubber shall be improved by adding additional stage of scrubber. Scrubbing shall have interlocking system with main plant. Cyclone followed by bag filter shall be provided to SSP plant and grinding section for controlling fugitive emissions. Cyclone dust collector will be provided to dryer in GSSP manufacturing and NPK manufacturing	<p>Proposed plant Silicon Fluoride gases passed through five stage-wet scrubbers before discharging into atmosphere through adequate stack height of 50 meters to control fluorine content with 15 mg/m³. In existing plant Scrubbing is already interlocking system with main plant Present plant the Cyclone followed by bag filter has been provided to SSP plant in grinding section for controlling emissions. Cyclone dust collector is provided to dryer in GSSP manufacturing and NPK manufacturing. Cemented roads made and Water sprinkled on roads to control the fugitive emission.</p> <p>Latest Monitoring report from RSPCB is enclosed as Annexure-1I and Photographs of Air Pollution monitoring Equipments Enclosed as Annexure-1II.</p>

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

ii.	The gaseous emissions (SO ₂ , NO _x , CO & Fluoride) & particulate matter from process stacks shall conform to the norms prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.	In existing plant Scrubbing is already interlocking system with main plant Present plant the Cyclone followed by bag filter has been provided to SSP plant in grinding section for controlling emissions. Latest Monitoring report from RSPCB is enclosed as Annexure-1I.
iii.	Ambient air quality data shall be collected as per NAAQES standards notified by the Ministry vide G.S.R. No. 826(E) dated 16th September, 2009. The levels of PM ₁₀ , SO ₂ , NO _x & Fluoride shall be monitored in the ambient air 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 & RSPCB.	Ambient air quality data is being collected as per NAAQS standards notified by the Ministry vide G.S.R. No. 826(E) dated 16th September, 2009. The levels of PM ₁₀ , SO ₂ , NO _x & Fluoride is being monitored regularly. Latest Monitoring report from RSPCB is enclosed as Annexure-1I. NAAQS notified are displayed on board at the gate. We already are online giving emission data to CPCB & RSPCB. Photographs of Online Air Pollution monitoring System Enclosed as Annexure-1V.

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

iv.	In plant control measures for checking fugitive emission form all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals / materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored.	<p>To control fugitive emission following measures have been taken</p> <ul style="list-style-type: none"> • Water sprinkling is being attended regularly at loading and unloading areas • Roads are being converted to concrete roads • Fugitive emissions are being controlled by providing closed storage, closed handling & conveyance of chemicals / materials, multi cyclone separator and water sprinkling system. • Fugitive emissions in the work zone environment, product, raw materials storage area etc. are regularly monitored. • Thick green cover is maintained to control fugitive emission. <p>Photographs of Fugitive Emission Control Enclosed as Annexure-V.</p>
v.	Fluoride monitoring through continuous fluoride analyzer shall be carried out in ambient air as well as stack.	<p>Point noted and complied. Continuous fluoride is being monitored.</p> <p>Photographs of fluoride analyzer Enclosed as Annexure-VI.</p>
vi	The gaseous emissions from DG Set shall be dispersed through adequate stack height as per CPCB standards. Acoustic	Acoustic enclosures have been provided to the DG sets to mitigate the noise sets to mitigate the noise

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

	enclosures shall be provided to the DG Acoustic enclosures have been provided to the DG sets to mitigate the noise sets to mitigate the noise pollution.	pollution. Stack is of standard height. Photographs of Acoustic Enclosure and Stack of DG Set_Enclosed as Annexure-VI.
vii.	Total fresh water requirement from tanker supply shall not exceed 313.5 m ³ /day. No ground water shall be used	Total Fresh water requirement will not exceed 313.5 m ³ /day. Fresh water requirement meet through tanker supply Receipts of the same are enclosed as Annexure-XIV. Water is being/will be reused in process. Application for NOC from CGWA for ground water abstraction has been applied. The acknowledgement of the same is Enclosed as Annexure-XV.
viii.	Effort shall be made to make use of rainwater harvested. If needed, capacity of the reservoir shall be enhanced to meet the maximum water requirement. Only balance water requirement shall be met from other sources. As proposed check dams with water storage capacity 3780 m ³ and 4500 m ³ respectively	The point is noted and is being followed
ix.	As proposed , industrial effluent shall be treated in ETP and recycled back in the process	The point is noted and is being followed
x.	No effluent shall be discharged outside the premises and 'Zero' discharge shall be	The point is noted and complied. Photographs enclosed as Annexure-

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

	ensured	VIII.
xi.	Process effluent / any waste water shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	The storm water & process water do not mix. Storm water drain is passing through garden pond
xii.	As proposed, H ₂ SiF ₆ liquor shall be filtered through filter press and clear liquor shall be reused to plant premises for acid dilution. The SiO ₂ shall be used as filler material for SSP final products. Adequate pollution control system shall be provided	H ₂ SiF ₆ liquor is being filtered through filter press and clear liquor is reused to plant premises for acid dilution. The SiO ₂ is used as filler material for SSP final products. Adequate pollution control system has been provided.
xiii.	The Company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date for management of Hazardous wastes and prior permission from RSPCH shall be obtained for disposal of solid/ hazardous waste in the TSDF. A copy of the same shall be submitted to the ministry and ministry's regional office at lucknow.	CCTV Camera focusing the outlet drains (storm water). Photographs enclosed as Annexure-VIII . Unit has taken Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans- Boundary Movement) Rules, 2008 from RSPCB valid up to 31/7/2020. Copy of Authorization from RSPCB is enclosed as Annexure-IX .
xiv.	The company shall strictly comply with the rules and guidelines under Manufacturer, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All Transportation of Hazardous Chemicals	Point noted and complied

Project :Expansion Project of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 30,00,00 TPA converted in Granular SSP), NPK (60,000 TPA) and additional Boronated SSP(25,000 TPA) and LABA(20,000 TPA)

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

	shall be as per the Motor Vehicle Act (MVA), 1989.	
xv.	<p>The company shall undertake following waste minimization measures:-</p> <p>a) Metering & control quantities of active ingredients to minimize waste.</p> <p>b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.</p> <p>c) Use of automated filling to minimize spillage.</p> <p>d) Use of close feed system into batch reactors.</p> <p>e) Venting equipment through vapour recovery system.</p> <p>f) Use of high pressure hoses for equipment clearing to reduce waste water generation</p>	<p>Point noted and complied</p> <p>As proposed all H_2SiF_6 is being used after filtration for acidulation dilution SiO_2 filtered & used as filler in SSP.</p>
xvi.	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.	The company has installed the all safety equipments / arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system has been installed.
xvii.	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act	Occupational health surveillance of the workers is being done on a regular basis and records maintained as per the

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

		Factories Act in Form No 30. Health Records are enclosed as Annexure-X.
xviii.	A comprehensive Green belt Development plan shall be developed in at least 33% area in and around the plant as per the CPCB guidelines to mitigate the effects of air emissions in consultation with local DFO. The plan shall be submitted to the Regional Office of the Ministry at Lucknow 3 months of issue of environment clearance letter	The plan for green belt development already made and also submitted to CPCB. Total Green Belt Area - 40000M ² Total Plant surveillance up to date- 2990 nos. Photographs Showing Green cover along with list of no. of plants and species is enclosed as Annexure-XI.
xix.	All the commitments made to the public during Public Hearing / Public consultation meeting held on 25th April, 2013 shall be satisfactorily implemented and adequate budget provision shall be made accordingly.	All commitments made during the Public Hearing are to be complied for the same plan will submitted and is stage wise complied with.
xx.	At least 5% of the total cost of the project shall be earmarked towards the Enterprises Social Commitment (ESC) based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Lucknow. Implementation of such program shall be ensured accordingly in a time bound manner.	The commitment during the public hearing for EC application is year marked for the purpose and as the project work progress this amount shall be used in implementation of the plan. The expenditure incurred towards CSR for welfare of the community during the years 2014-15 - Rs 95600/- 2015-16 - Rs 63400/- 2016-17 - Rs 87500/-

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

Promoter : M/s Rama Phosphates Ltd

		2017 -18 - Rs. 22500/- The List of detailed CSR activates of last three years has been enclosed as Annexure-XII .
xxi.	The company shall submit within three months their policy towards Corporate Environment Responsibility which should inter-alia address (i) Standard operating process / procedure to being into focus any infringement / deviation / violation of environmental clearance conditions and (iii) System of reporting of non-compliance /violation environmental norms to the Board of Directors of the company and / or stakeholders or shareholders.	The CER is being prepared for expansion project, however on site and off site plans in case of disaster or Environment countervention are already in place and mock drills are also conducted at intervals. A committee is formed to make policy towards Corporate Environment Responsibility is being prepared and will be submitted within one month.
xxii.	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, mobile sewage treatment plant, safe drinking water, medical health care creche 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.	The contents are noted and are Undisputed.

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Promoter : M/s Rama Phosphates Ltd

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

B. GENERAL CONDITIONS

Conditions		Compliance Status
i.	The project authorities must strictly adhere to the stipulations made by the Rajasthan State Pollution Control Board (RSPCB), State Government and any other statutory authority	The contents undisputed.
ii.	No further expansion or modification in the project shall be carried out without prior approval of the Ministry of Environment & 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.	The contents undisputed.
iii.	The project authorities must strictly comply with rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 2000 amended	The contents are noted and are undisputed.

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Promoter : M/s Rama Phosphates Ltd

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

	subsequently. Prior approvals from Chief Inspectorate of Factories, Chief Controller of Explosives, Fire Safety Inspectorate etc. must be obtained, wherever applicable.	
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 confirm to the standards prescribed under EPA Rules, 1989 Viz. 75 DbA (Day time) and 70dBA (night time).	The necessary control measures are being/will be provided while installing the machines
v.	A separate Environmental Management Cell equipped with full fledged laboratory facilities must be set up to carry out the environmental management and monitoring functions.	Yes, a separate Environmental management cell equipped with full fledged lab to carry out the management and monitoring functions exist. Photographs of the same have been enclosed as Annexure-XIII .
vi.	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zilla Parishad / Municipal Corporation, Urban Local Body and the local NGO, if any, form whom suggestions/	All ready notified and published in news papers. Uploaded on company web site.

Project :Expansion Project of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 30,00,00 TPA converted in Granular SSP), NPK (60,000 TPA) and additional Boronated SSP(25,000 TPA) and LABA(20,000 TPA)

Promoter : M/s Rama Phosphates Ltd

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

	representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.	
vii.	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEF, the respective Zonal Office of CPCB and the RSPCB. The criteria pollutant levels namely; PM10, SO ₂ , NO _x , HC (Methane & Non-methane), VOCs (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	Continuous monitoring system is in place for existing plants and is periodically submitted to RPCB, CPCB and ministry regional office. A board is placed in front of main gate where the data is updated daily.
viii.	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data	We are submitting the six monthly reports on the status of the compliance to Regional Office, MOEF, The Zonal Office of CPCB & RSPCB through hard copy & e-mail. Same is posted on

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Promoter : M/s Rama Phosphates Ltd

Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

	(both in hard copies as well as by e-mail) to the Regional Office of MOEF, the respective Zonal Office of CPCB and the RSPCB. The Regional Office of this Ministry / CPCB / RSPCB shall monitor the stipulated conditions. Environmental Clearance and six monthly compliance status reports shall be posted on the website of the company	company website.
ix.	The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent 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 of compliance of environmental conditions and shall also be sent to the respective Regional Offices of the MOEF by e-mail.	The environmental statement in form V is submitted to RSPCB & MOEF Regional Office also being uploaded on company web site.
x.	The Project Proponent shall inform the public that the project has been Complied with reported to SPCB,	Complied with reported to SPCB, MOEF, regional office & he4ad office. Published in two local news papers as public notice

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Compliance Report of the conditions laid in the Environmental Clearance: up to June'2017

	MOEF, Regional Office & Head Office. Published in Accorded environmental clearance by the Ministry and copies of the clearance letter are available with the RSPCB and may also be seen at Website of the Ministry of Environment and Forests and 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 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 forwarded to the Regional Office.	copies were sent as above.
xi.	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 commencing the land development work.	Noted and undisputed. The existing Location is only being used for the proposed expansion.
