



सत्यमेव जयते

भारत सरकार
GOVERNMENT OF INDIA

पर्यावरण, वन एवं जलवायु परिवर्तन
मंत्रालय

MINISTRY OF ENVIRONMENT, FOREST &
CLIMATE CHANGE

क्रमांक: 5-14/2002(ENV)/257
प्रति,

डॉ. ललित बोकोलिया,
अति. निदेशक,
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,
इंदिरा पर्यावरण भवन,
जोर बाग रोड, अलीगंज,
नई दिल्ली - 110003

SPEED POST

क्षेत्रीय कार्यालय, पश्चिम क्षेत्र,
Regional Office, Western Region,

"केन्द्रीय पर्यावरण भवन"

"Kendriya Paryavaran Bhavan"

लिंक रोड नं०-3/Link Road No. 3

E-5, रविशंकर नगर/Ravi Shankar Nagar,

भोपाल (म०प्र०)/Bhopal-462016 (M.P.)

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दिनांक: 14.5.2015

विषय: Manufacture of technical pesticides and intermediates at the existing unit in MIDC, Tarapur, District Thane, Maharashtra by M/s SC Enviro Agro India Pvt. Ltd. (now M/s Sumitomo Chemical India Pvt. Ltd.) – reg.

संदर्भ: Ministry's letter no. J-11011/71/2001-IA.II dated 14.6.2002.

महोदय,

मंत्रालय के उपरोक्त संदर्भित पत्रांकों के संदर्भ में उक्त परियोजना को पर्यावरणीय दृष्टिकोण से अनुमति देते समय अनुबद्ध शर्तों के अनुपालन एवं certification of compliance की अनुवीक्षण प्रतिवेदन (मॉनिटरिंग रिपोर्ट) एतद् द्वारा संलग्न कर प्रेषित है। अनुवीक्षण प्रतिवेदन मंत्रालय की वेबसाइट पर भी अपलोड की जा रही है।


भवदीय

संलग्न: उपरोक्तानुसार


निदेशक (एस)

- प्रतिलिपि:-
1. डॉ. पी. बी. रस्तोगी, निदेशक, पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, इंदिरा पर्यावरण भवन, जोर बाग रोड, अलीगंज, नई दिल्ली - 110003 की ओर सूचनार्थ एवं आवश्यक कार्यवाही हेतु।
 2. Shri V. S. Raju, Plant Manager, M/s Sumitomo Chemical India Pvt. Ltd., T-137/138/113/251, MIDC, Tarapur, Boisar, Thane - 401 506- for information.

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निदेशक (एस)

Monitoring the Implementation of Environmental Safeguards
Ministry of Environment, Forest & Climate Change
Western Region, Regional Office, Bhopal
MONITORING REPORT

PART – I
DATA SHEET

1.	Project type: River- valley/ Mining/ Industry/ Thermal/ Nuclear/Other (specify)	:	Industry
2.	Name of the project	:	Manufacture of technical pesticides and intermediates at the existing unit in MIDC, Tarapur, Dist. Thane by M/s SC Enviro Agrochemical India Pvt. Ltd. (now M/s Sumitomo Chemical India Pvt. Ltd.)
3.	Clearance letter (s)/OM No. & date	:	J-11011/71/2001-IA.II dated 14.6.2002
4.	Location: a) District (s) b) State (s) c) Location Latitude/Longitude	:	Thane Maharashtra 18°42' – 20°20' N / 72°45' – 73°45' E
5.	Address for correspondence a) Address of the Concerned Project Chief Engineer (with Pin Code & telephone/ telex/ fax numbers) b) Address of Executive Project Engineer/ Manager (with Pin Code/fax numbers)	:	The Director, M/s Sumitomo Chemical India Pvt. Ltd., Moti Mahal, 7 th Floor, 195, J. Tata Road, Churchgate, Mumbai – 400 020 The General Manager (Mfg), M/s Sumitomo Chemical India Pvt. Ltd., T-113/137/138/251, MIDC, Tarapur, Boisar Ph. 02525 – 272888/272889
6.	Salient features a) Of the project b) Of the EMP	:	EIA/EMP has been submitted to the Ministry and details were included in the earlier monitoring reports.
7.	Breakup of the project area a) Submergence area: forest & non-Forest b) Others	:	18196 sq.m.
8.	Breakup of the project affected population with enumeration of those losing houses/dwelling units only agricultural land only, both dwelling units & agricultural land & landless laborers/artisans: a) SC, ST/Adivasi b) Others (Please indicate whether these figures are based on any scientific and systematic survey carried out or only provisional figures, if a survey is carried out give details & year of survey)	:	NA
9.	Financial details: a) Project cost as originally planned and subsequent revised estimates and the year of price reference b) Allocation made for EMP with item wise	:	Rs. 5.28 Cr. Details not provided

	and year wise break-up c) BC ratio/IRR and the year of assessment d) Whether (c) includes the cost of EMP as shown in the above e) Actual expenditure incurred on project so far f) Actual expenditure incurred on EMP so far	: - : - : Details not provided : Rs. 5.80 Lakhs incurred on monthly basis on O&M of ETP, monitoring of air & water quality, hazardous waste disposal charges & green belt development and its maintenance
10.	Forest land requirement a) The status of approval for diversion of forest land for non-forestry use b) The status of clearing felling. c) The status of CA, if any d) Comments on the viability & sustainability of CA program in the light of actual field experience so far	: NA : : :
11.	The status of clear felling in non-forest areas (Such as submergence area or reservoir, approach Roads.), if any with quantitative information required.	: NA
12.	Status of construction (Actual &/or planned) a) Date of commencement b) Date of completion	: 1.9.2001 : 15.2.2002
13.	Reasons for delay if the project is yet to start	: NA
14.	Dates of site visits a) The dates on which project was monitored by the RO on previous occasions, if any b) Date of site visits for this monitoring report	: 30.1.2003, 31.10.2007 : 4.2.2015
15.	Details of correspondence with PA for obtaining act on plans/information on status of compliance to safeguards other than the routine letters for logistic support for site visits. (The first monitoring report may contain the details of all the letters issued so far, but the later reports may cover only the letter issued subsequently)	: As below
Date	Letter from R.O.	Date Reply from P.A.
-	-	6.3.08 Compliance report sub.
-	-	27.3.09 Compliance report as per EC sub.
-	-	5.3.09 Compliance report as per EC sub.
-	-	28.7.09 Compliance report as per EC sub.
-	-	4.3.10 Compliance report as per EC sub.
-	-	27.7.10 Compliance report as per EC sub.
-	-	12.2.11 Compliance report as per EC sub.
-	-	21.7.11 Compliance report as per EC sub.
-	-	12.1.12 Compliance report as per EC sub.
14.2.12	Six monthly compliance report req.	30.7.12 Compliance report as per EC sub.

-	-	29.1.14 Six monthly compliance, data sheet & analysis report sub.
-	-	15.2.14 Compliance certification req.
21.3.14 CTE/CTO, EIA/EMP, show cause notices/ closures, details of court cases, Form-V, expenditure incurred on EMP, status of uploading, data sheet, chronology of events, TOR, monitoring schedule req.		29.5.14 Req. information sub.
-	-	6.6.14 Soft copy of EIA sub.
-	-	20.1.15 Six monthly compliance, data sheet & analysis report sub. & compliance certification again req.
-	-	27.2.15 Information sought sub. after the visit
-	-	25.3.15 Information sought sub. after the visit

PART – II & III
DESCRIPTIVE REPORT ON STATUS OF COMPLIANCE TO CONDITIONS OF
ENVIRONMENTAL CLEARANCE AND ENVIRONMENTAL MANAGEMENT
O.M. No.: J-11011/71/2001-IA.II dated 14.6.2002

A.	SPECIFIC CONDITIONS:	
1.	The gaseous emissions (SO ₂ , NO _x) and suspended particulate matter, from various process units should conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission level should go beyond the stipulated standards. In the event of failure to pollution control system(s) adopted by the unit, the respective unit should not be restarted until the control measures are rectified to achieve the desired efficiency.	Complied. The gaseous emissions and suspended particulate matter from various process units, boilers & DG sets have been monitored weekly by third party and analysis report of the same, as submitted, do not show anomaly.
2.	A minimum of three AAQ monitoring stations should be set up based on the micro meteorological conditions as well as where maximum ground level concentration of SPM, SO ₂ , NO _x are anticipated in consultation with the SPCB. The data recorded should be submitted to the RO at Bhopal every six months and to the SPCB every three months.	Complied. Company has set up the three locations for AAQ monitoring on the basis of micro meteorological conditions. Weekly analysis reports show all the parameters within prescribed norms.
3.	As reflected in the EMP, the process effluent and utilities should be adequately treated to meet the norms prescribed for CETP and should be regularly monitored prior to disposal into the CETP at Tarapur.	Partly Complied. The process effluent and waste water from various utilities was being treated in ETP having capacity 300 KLD to meet the inlet norms of CETP. Weekly samples of process effluent were collected and analyzed for the parameters stipulated by the MPCB. Analysis reports do not show any anomaly. However, bioassay test reports were not submitted and PA was directed to do so. The yearly consumption of water was 22379 m ³ and about 7302 m ³ effluent was generated during 2012-13.
4.	The hazardous solid waste (ETP sludge) should be incinerated. As per the commitment given in the EMP the incinerator ash should be disposed off in the common secured landfill site approved by the SPCB at MIDC, Taloja being developed by M/s Mumbai Waste Management Ltd. The secured landfill site should be provided with impermeable HDPE lining and leachate collection facility.	Complied. Total waste generated was being disposed at CHWSTDF site developed by M/s Mumbai Waste Management Ltd. About 24.88 MT waste was generated during 2012-13 which was within the limits.
5.	The company shall monitor and maintain the cyanide concentration in all the batches before dispatching the effluent to the CETP in	Complied. Cyanide concentration in all the batches as well in effluent outlet was being monitored regularly. Analysis reports have been

	addition to the existing checks. Sensors for detecting CN leakage should be provided at strategic locations at the work place.	submitted which do not show any anomaly. PA has submitted that sensors for detection of cyanide leakage have been provided.
6.	The cyclonic scrubber design should be modified to facilitate the proper flue gas flow so that desired separation efficiency is achieved. Company must take up this matter with the suppliers and modify the same. Incinerator emissions should be regularly monitored.	Complied. The cyclonic scrubber design has been modified for deriving by-products from waste gases.
7.	Company should follow a well-planned environmental monitoring programme to monitor the release of obnoxious vapours/ fugitive emissions and housekeeping of the plant.	Complied. An environment monitoring plan was submitted which was being followed.
8.	The company should have in place noise mitigation measures like noise level monitoring, use of noise protection plugs etc.	Complied. A noise mitigation measure has been implemented within plant. Noise monitoring was being carried at various locations within plant.
9.	The PP shall also comply with all the environmental protection measures and safeguards recommended in the EIA and risk analysis reports.	Complied. Unit has already provided safety equipments to all the workers as recommended in EIA.
B. GENERAL CONDITIONS:		
1.	The PA must strictly adhere to the stipulations made by the MPCB and the State Govt.	Complied. PA has obtained CTO vide letter no. BO/AS (T)/EIC no. TN-3173-10/R/CC-1198 dated 13.6.2013 which valid up to 31.8.2016.
2.	No further expansion or modifications in the plant should be carried out without prior approval of the MOEF.	Agreed to Comply. PA has submitted that the condition is "Noted" and assured to abide by the condition.
3.	In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference should be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	Agreed to Comply. PA has submitted that the condition is "Noted" and assured to abide by the condition.
4.	The PA must strictly comply with the rules and regulations under MSIHC Rules, 1989 as amended on 3 rd October, 1994. Prior approvals from Chief Inspectorate of Factories, Chief Controller of Explosives, etc. must be obtained.	Partly Complied. All relevant approvals have already been obtained which are as below: <ul style="list-style-type: none"> • Chief Inspectorate of Factories (Ref. no. 2(M)(i)-24119 Vasai • Chief Controller of Explosives (Ref. no. P/HQ/MH/15/2031 (P7322) The status of solvent storage area is shown in Photo 1 . Copy of onsite emergency plan and mock drill reports were not submitted.
5.	The PA must strictly comply with the rules and regulations with regard to the handling and disposal of hazardous wastes in accordance with the HWMH Rules, 2000. Authorization from the SPCB must be	Complied. PA has obtained CTO vide letter no. 1.0/BO/AS(T)/TN-5163-14/CC Cell/A/CC-9108 dated 30.9.2014 valid up to 31.8.2016. Details of hazardous waste have been submitted. Liquid waste was stored in barrels at designated area

	obtained for collection/treatment/storage/disposal of hazardous wastes.	(Photo 2). With regard to ETP sludge, it was stored near the ETP before its disposal to TSDF.
6.	Occupational health surveillance program should be undertaken as regular exercise for all the employees, specially for those engaged in handling hazardous substances.	Complied. Occupational health surveillance program was being conducted on quarterly basis and records for all the employees as per the Factories Act and records were maintained.
7.	The overall noise levels in and around the plant area should be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Complied. Noise levels in and around the plant area (11 stations) was being monitored at various locations within plant. Analysis reports do not show any anomaly.
8.	The PP should have a scheme for social upliftment in the nearby village with reference to contribution in road construction, education of children, festivals, health centre, sanitation facilities, drinking water supply, community awareness & employment to local people whenever possible both for technical and non technical jobs.	Partly Complied. Since the industry is located in the industrial area, PA has donated Rs. 5600 from July – December 2014 towards social festival in the area. Although PA has claimed during earlier inspection that social up-liftment is yet to be prepared but no such plan was prepared so far.
9.	Green belt of adequate width and density should be provided to mitigate the effects of fugitive emission all around the plant. A minimum of 25% of the total land acquired should be developed as green belt in consultation with the local DFO.	Complied. About 4500 sqm area has been brought under green belt (Photos 3 – 4). PA was directed to raise plantation in the vacant place available within the premises.
10.	The PA will set up separate EMC for effective implementation of all the above stipulations under control of Sr. Executive.	Complied. EMC is headed by plant manager who is assisted by co-coordinator and ETP operators.
11.	The PA will provide adequate funds both recurring and non-recurring to implement the conditions stipulated by the MOEF as well as the State Govt. along with the implementation schedule for all the conditions stipulated herein. The funds so provided should not be diverted for any other purposes.	Complied. Rs. 5.80 Lakhs have been incurred on monthly basis on O&M of ETP, monitoring of air & water quality, hazardous waste disposal charges & green belt development and its maintenance.
12.	The RO of this Ministry at Bhopal/CPCB/SPCB will monitor the stipulated conditions. A six monthly compliance status report and the monitored data along with statistical interpretation should be submitted to them regularly.	Complied. A six monthly compliance status along with analytical data have been submitted regularly.
13.	The PP 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	Complied. PA has been advertised in two local newspapers namely “Free Press” and “Sakal” on 18.6.2002 i.e. within stipulated period of seven days.

	accorded EC by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at website of the MOEF at 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 RO at Bhopal.	
14.	The PA should inform the RO 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.	Partly Complied. The date of final approval of the project was 14.4.2002 but details of financial closure were not submitted.
15.	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Agreed to Comply. PA has submitted that the condition is "Noted" and assured to abide by the condition.
16.	The Ministry reserves the right to stipulate additional conditions if found necessary. The company in a time bound manner will implement these conditions.	Agreed to Comply. PA has submitted that the condition is "Noted" and assured to abide by the condition.
17.	The above conditions will be enforced, inter-alia under the provisions of the Water (P & CP) Act, 1974, the Air (P & CP) Act, 1981, the EP Act, 1986 and the PIL Act, 1991 along with their amendments and rules.	Partly Complied. It is inferred from the above that PA has obtained CTO which is valid up to 31.8.2016. The production was found within the limits from 2011-14 as per the details submitted. The quantity of generation of effluent and hazardous waste found within the limits. The monitoring of air and water quality was found satisfactory. It was observed during the visit that an old incinerator was not put into operation (Photos 5 – 6) for which PA was directed to dismantle for safety reasons. New incinerator was installed and was found in operation (Photos 7 – 8) . Moreover, bioassay test reports were not submitted and PA was directed to do so. Copy of onsite emergency plan and mock drill reports were not submitted. Copy of the PLI was also not submitted.

END NOTE:

- 1. Chronology of events:** PA has submitted that TOR application was submitted to MOEF vide letter dated 20.1.2011 & proposed TOR was considered on 30-31.5.2011. Subsequently TOR was issued vide letter dated 15.7.2011. The presentation made before the EAC again on 12.6.2012 and EAC sub-committee had visited the site on 7.5.2013. PA has requested Regional Office of the Ministry for issuance of certification vide letters dated 15.2.2014 & 20.1.2015. The Regional Office requested for information w.r.t. issuance of certification vide letter dated 21.3.2014. Requested information was submitted vide letter dated 29.5.2014. The desired information was submitted after the visit vide letters dated 27.2.2015 & 25.3.2015.
- 2. Implementation of Conditions:** It is inferred from the above that PA has obtained CTO which is valid up to 31.8.2016. The production was found within the limits from 2011-14 as per the details submitted. The quantity of generation of effluent and hazardous waste found within the limits. The monitoring of air and

water quality was found satisfactory. It was observed during the visit that an old incinerator was not put into operation (**Photos 5 – 6**) for which PA was directed to dismantle for safety reasons. New incinerator was installed and was found in operation (**Photos 7 – 8**). Moreover, bioassay test reports were not submitted and PA was directed to do so. Copy of onsite emergency plan and mock drill reports were not submitted. Copy of the PLI was also not submitted.

3. **Housekeeping:** It was found satisfactory.
4. **Review w.r.f to MOEFs letter dated 30.5.2012:** The above mentioned report was prepared after site visit for the proposed expansion and implementation of stipulation was reviewed as on 4.2.2015.
5. **Court Cases:** PA has submitted that there is no court case against them.
6. **Uploading of compliance on web site:** It was submitted that PA does not have website and hence uploading was not carried out. Ministry may like to take up with PA during appraisal.
7. **With regards to issuance of show cause/closure notices:** PA has submitted the following details regarding show cause/closure notices which are issued over last three years:

Show cause notice No. & date	Points raised (Under Section)	Reason	Action taken by industry	Final action by SPCB
MPCB/AST /TS-CD/B-4625 dated 15.10.2013	33A of Water (P & CP) Act, 1974 and 31A of Air (P & CP), Act, 1981	Closure notice issued for following: <ul style="list-style-type: none"> • Direct draining of filter backwash into final outlet leading to CETP. • By passing arrangement for discharge of effluent directly to final treated tank. • Bioassay test was not conducted. • Non disposal of hazardous waste within stipulated time. • No flow meter at final effluent discharge. 	Reply submitted on 24.10.2013.	Revoke order was issued vide letter dated 1.11.2013 after considering the reply, personal hearing and visit of board officials.


Director(S)

Photo 1: Showing view of solvent storage area



Photo 2: Showing storage of HW in the earmarked area



Photos 3 – 5: Showing view of green belt



Photos 5 – 6: Showing view of old incinerator



Photos 7 – 8: Showing view of new incinerator

