

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI
OA 108 of 2024

Bhagat Singh and Ors.

...Applicants

v.

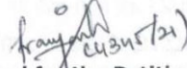
Union of India and Ors.

...Respondents

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Sl. No.	Date	Description	Pg. No.
1.	16.12.1993	Environment Clearance	184
2.	21.07.2023	TNPCB letter certifying that there is "No increase in Pollution Load"	190

Certified to be true copies of the respective originals.
Dated at Chennai on this the 26th day of November, 2024
Through



Iraiyanbu P.
Counsel for the Applicants
Ph: 9094722907
Email: iraiyanbup14@gmail.com

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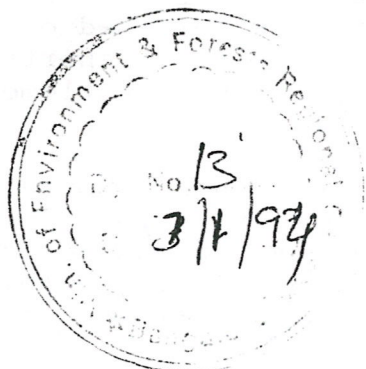
EP/12-1/66/TN

No. J-11011/7/93-IA.II

Government of India

Ministry of Environment & Forests

IA-II(I) Section



Paryavaran Bhavan,
C.G.O. Complex,
Lodhi Road,
New Delhi-110003.

16th December, 1993.

OFFICE MEMORANDUM

Sub: Expansion-cum-Modernisation of Compound Fertilizer Complex (APS 1,70,000 TPA, Sulphuric Acid 1,81,000 TPA & Phosphoric Acid 35,800 TPA) by M/s. EID Parry (India) Ltd., Ennore.

This has reference to letters dated 17th Nov. 1992 and 22nd July, 1993 on the above subject from General Manager, EID Parry (India) Limited, Ennore.

2. The project has been examined and environmental clearance is accorded to the expansion scheme, except the proposal for ammonia storage facilities to be created at Madras Port, subject to implementation of the following conditions and environmental safeguards:

- i. The project authorities must strictly adhere to the stipulations made by the Tamil Nadu Pollution Control Board and the State Government;
- ii. No expansion or modernisation of the plant should be carried out without prior approval of the Ministry of Environment & Forests.
- iii. The gaseous emissions (SO₂, F, NO_x, NH₃, particulate matter and hydrocarbons) from the various processes/units should conform to the load/mass based standards notified by this Ministry on 19th May, 1993 or those may be notified from time to time. The State Board may specify more stringent standards for the relevant parameters keeping in view the nature of the industry and its location. At no time, the emissions should go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the units, the respective unit should be immediately put out of operation and should not be restarted until the control measures are rectified to achieve the desired efficiency.
- iv. Atleast four ambient air quality monitoring stations should be set up in the down wind direction as well as

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where maximum ground level concentrations of Fluorine, SO₂, NO_x, NH₃ and SPM are anticipated in consultation with the State Pollution Control Board. The air quality monitoring stations should be selected on the basis of modelling exercise to represent short-term ground level concentrations, human settlements, sensitive targets etc.

Port holes and sampling facilities should be provided for all the stacks as per the Central Pollution Control Board Guidelines. Stack emissions should be monitored by setting up an automatic continuous stack monitoring unit in consultation with the State Pollution Control Board.

Data on ambient air quality and stack emissions should be submitted to this Ministry once in six months and to the State Pollution Control Board once in three months along with the statistical analysis and interpretation.

- v. Rock Phosphate Storage area should be separated from the APS storage site. Regular monitoring within and outside the APS Store House, and product packing zone should be carried out for ammonia.
- vi. The Sulphur storage yard should have a separate drain to collect surface run-off water.
- vii. On-line SO₂ monitor should be provided with the Sulphuric Acid Plant.
- viii. Ammonia gas leakages from storage and loading points should be efficiently controlled or collected and scrubbed or may be sent to incinerator for flaring.

Adequate precautions for handling ammonia vapours in case of emergency situation arising due to closure of the plant should be taken.

- ix. Fugitive emissions should be controlled, regularly monitored and data recorded. Automatic monitors for ammonia should be provided at appropriate places in the plant. Fugitive emissions of sulphur dust during the charging operations should be controlled. Fumes of sulphur emanating from molten sulphur tank should also be controlled.
- x. Oil bearing waste water should be treated for removal of oily matter and oil traps should be properly maintained so as to conform to the prescribed standards.

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- xi. Guard Pond(s) of sufficient holding capacity should be provided to cope up with the effluents discharged during the process disturbances. The contributing units should be immediately shut down and should not be restarted without bringing the system back to normalcy.
- xii. The industry should practice "zero discharge" from the plant, except the cooling tower blow down. The waste water should be recycled to the extent possible and should conform to the prescribed standards of TNPCB.
- xiii. The ground water tapping should be completely stopped by June, 1994 either by commissioning RO/multi-stage distillation plant.
- xiv. Adequate number of effluent and ground water monitoring stations should be set up in consultation with the State Pollution Control Board. Regular monitoring should be carried out for relevant parameters. Monitored data along with statistical analysis and interpretation in the form of a report should be submitted to this Ministry once in six months and to the State Pollution Control Board once in three months.
- xv. The hazardous wastes should be handled as per the Hazardous Waste (Management & Handling) Rules, 1989 of the Environment (Protection) Act, 1986.
- xvi. Handling, manufacture, storage and transport of hazardous chemicals should be carried out in accordance with the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989.
- xvii. The project authorities should prepare and submit detailed quantitative risk assessment report along with on-site and off-site emergency preparedness plans (EPP) especially for ammonia stored within the premises of the fertilizer plant as required under the Rules 13 and 14 of the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 within six months. EPPs should have approval from the competent authorities.
- The approval of the Chief Inspector of Explosives should also be obtained.
- xviii. Adequate measures for the control of noise within the plant should be taken so as to keep the noise levels below 85 dB in the working environment.

Persons working near the noisy machines in Compressor Room, DMP etc. should use ear muffs/plugs.

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- xix. Suitable alarm system and standard procedure for transmitting the information on the occurrence of an accident to the proper focal point should be established. Steps should also be taken to ensure access to information on weather conditions prevailing at the time and weather forecast. Wind socks at appropriate locations should be provided.
- xx. The workers entering the APS Godown and product packing areas should be provided with protective clothes, safety shoes, gloves etc.
- xxi. The height of containment wall all around the gypsum yard should be raised by atleast 1.5 metres to avoid overflow of water and gypsum. Periodically, strength of the impervious LDPE lining provided in the pond should be checked to avoid ground water contamination.
- xxii. Health status of the Ammonia Storage Tank, Stacks and other metallic structures should be carried out regularly and anti-corrosion measures be undertaken to ensure structural soundness.
- xxiii. A workable plan for 100 percent gypsum utilisation should be prepared and submitted to this Ministry for approval within 3 months.
- xxiv. A green belt of adequate width and density should be raised all around the fertilizer complex and the township. Native plant species should only be selected for this purpose in consultation with the local DFO.
- xxv. A separate Environmental Management Cell with suitably qualified people to carry out various functions should be set up under the control of Senior Executive, who will report directly to the Head of the organisation.
- xxvi. Periodic medical check-up of the workers should be done and records maintained.
- xxvii. The funds earmarked for the environmental protection measures should not be diverted for other purposes and yearwise expenditure should be reported to this Ministry.
- xxviii. The industry should obtained necessary approval from this Ministry for the proposed ammonia storage facilities (12,500 Tonnes) to be provided at Madras Harbour. They should also abide by the provisions of CRZ notification.

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The Secretary
Ministry of
Shastri Bha
New Delhi -

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3. This Ministry or any competent authority may stipulate any further condition(s) on receiving reports from the project authorities.

4. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.

5. The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the Public Liability Insurance Act, 1991 along with their amendments and rules.

(K.K. JAIN)
Joint Director.

The Secretary,
Ministry of Chemicals & Fertilizers,
Shastri Bhavan,
New Delhi - 110001.

Copy to :-

1. Chairman & Managing Director, EID Parry (India) Ltd., "Dare House", Post Box No. 12, Madras - 600 001.
2. Chairman, Tamil Nadu Pollution Control Board, 32, Santhome High Road, 3rd & 4th Floors, Madras - 600 004.
3. Chairman, Central Pollution Control Board, Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 110 032.
4. Chief Conservator of Forests(Central), Regional Office (South Zone), No. 463, 1st Main, IIIrd Block, IIIrd Stage, Basaveswara Nagar, Bangalore - 560 079.
5. Guard File.
6. Monitoring File.
7. Record File.

(K.K. JAIN)
Joint Director.

moesro@gmail.com

Sridhar-mef@nic.in



TAMIL NADU POLLUTION CONTROL BOARD



From
Thiru R.Kannan, M.Tech.,
Member Secretary,
Tamil Nadu Pollution Control Board
76, Mount Salai, Guindy
Chennai – 600 032.

To
The Managing Director
M/s. COROMANDEL INTERNATIONAL LIMITED,
S.F.No. 37/B2,38/5A,39/B1,39/6A,246/2,3,4,
5,6,7,247/(part)1A,2A,3C,3A,
ERNAVOOR Village,
Thiruvottiyur Taluk,
Chennai District

Lr No. T1/TNPCB/F.016460/CHN/RL/2023 Dated : 21.07.2023

Sir,

Sub: TNPCB- Industries – M/s. Coromandel International Limited, located at S.F.No. 37/B2, 38/5A, 39/B1, 39/6A, 246/2,3,4,5,6,7 & 247/1A,2A,3C,3A, Ernavoor Village, Thiruvottiyur Taluk, Chennai District - application for " No Increase in Pollution Load Certificate" - Decision of Pollution Load Assessment Committee meeting held on 29.05.2023 - Communicated - Reg.

- Ref:**
1. Environmental Clearance issued by MoEF MoEF Lr. No. J-11011/358/2007-IA II (I) dated 03.09.2007.
 2. Your application submitted for requesting " No increase in Pollution Load Certificate Dt. 12.01.2023
 3. Minutes of PLAC meeting held on 29.05.2023.

I invite attention to the reference 2nd cited, wherein the unit M/s. Coromandel International Limited, located at S.F.No. 37/B2, 38/5A, 39/B1, 39/6A, 246/2,3,4,5,6,7 & 247/1A,2A,3C,3A, Ernavoor Village, Thiruvottiyur Taluk, Chennai District has applied for "No increase in pollution load certificate" for the proposed production enhancement of Ammonium Phosphate Potash Sulphate from 300000 TPA to 400000 TPA in the existing Chemical Fertilizer Plant, without any additional equipments and without generation of any additional effluent as well as air pollution.

Existing Products:

I	Products	
a	Ammonium Phosphate Potash Sulphate	3,00,000 MT/Year
II	By-Products	
a	Gypsum	41,000 MT/ Month
III	Intermediate Products	
a	Phosphoric Acid	66,000 MT/Year
b	Sulphuric Acid	2,58,000 MT/Year
c	Captive Power	4 MW

Proposed:

I	Products	
a	Ammonium Phosphate Potash Sulphate	4,00,000 MT/Year
II	By-Products	
a	Gypsum	492000 MT/ yEAR

III	Intermediate Products	
a	Phosphoric Acid	66,000 MT/Year
b	Sulphuric Acid	2,58,000 MT/Year
c	Captive Power	4 MW

1. Raw materials (Product – wise) for existing:

S. No	Name of Product	Quantity (TPA)	Name of the Raw material (product wise)	Quantity (TPA)	Remark
A Main Product					
1	Ammonium Phosphate Potash Sulphate (APPS)	300000	Ammonia	54780	
			Sulphuric Acid	93720	
			Phosphoric Acid	171270	
			MOP	79200	
			Water	33000	
Sub Total				431970	
B By-Products					
1	Gypsum	492000	-	-	
C Intermediate Product					
1	Sulphuric Acid	258000	Sulphur	81840	
			Water	7590	
Sub Total				89430	
2	Phosphoric Acid	66000	Rock Phosphate	239250	
			Sulphuric Acid	164340	
			Water	229350	
Sub Total				632940	
3	Captive Power	4 MW	-		

1. Raw materials (Product – wise) for proposed:

S. No	Name of Product	Quantity (TPA)	Name of the Raw material (product wise)	Quantity (TPA)	Remark
A Main Product					
1	Ammonium Phosphate Potash Sulphate (APPS)	400000	Ammonia	44880	
			Sulphuric Acid	44880	
			Phosphoric Acid	188100	
			MOP	105600	
			Water	39930	
			Ammonium Sulphate	107910	
Sub Total				531300	
B By-Products					
1	Gypsum	492000	-	-	
C Intermediate Product					
1	Sulphuric Acid	258000	Sulphur	81840	
			Water	7590	
Sub Total				89430	
2	Phosphoric Acid	66000	Rock Phosphate	239250	
			Sulphuric Acid	164340	
			Water	229350	
Sub Total				632940	
3	Captive Power	4 MW	-		



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2. Sewage:

Details	Existing – KLD				Proposed - KLD			
	Existing (Quantity in KLD) – 0.0029 KL/ton of product				Proposed*(Quantity in KLD) - 0.0027 KL/ton of product			
	Pollution load before treatment		Pollution load after treatment		Pollution load before treatment		Pollution load after treatment	
	mg/lit	kg/Ton of Product	mg/lit	kg/Ton of Product	mg/lit	kg/Ton of Product	mg/lit	kg/Ton of Product
BOD	-	-	6.60	0.000019	-	-	6.60	0.000017
TSS	-	-	12.0	0.000035	-	-	12.0	0.000032

Status of Online Connectivity in TNPCB and CPCB – Effluent

Station Name	Type of Monitoring System	Process Attached	Parameter Monitored	Device Make	Device Vendor	Last Calibrated on
STP – pH	Effluent	Sewage Treatment Plant	pH	GLI International	Hach	04.10.2022
STP – Flow	Effluent		Flow	Krohne – Forbes Marshall	Forbes Marshall	04.10.2022
MED Outlet	Effluent	Multi Effect Desalination	pH	GLI International	Hach	07.10.2022
MED Outlet	Effluent		Flow	Forbes Marshall	Forbes Marshall	07.10.2022

3. Trade Effluent:

Concentration of Pollution (for all manufacturing process and utilities)				
Details	Existing ---KLD- (---KL/ton of product)		Proposed ---KLD* (---KL/Ton of product)	
	Pollution concentration before treatment (mg/l)	Pollution concentration after treatment (mg/l)	Pollution concentration before treatment (mg/l)	Pollution concentration after treatment (mg/l)
pH	1095 KLD of total trade effluent generated from Cooling Tower Blow down			
BOD	I & II (96 KLD + 105 KLD), Boiler Blow down I & II (7 KLD + 9 KLD),			
COD	Condensate Recovery from Sulfuric Acid Plant I & II (778 KLD), Captive			
TSS	Power Plant & Instrument Air Compressor water (10 KLD) and Multiple			
TDS	Effect Desalination Plant Seal Water (90 KLD) is directly reused in			
Chlorides	Sulfuric Acid Plant I & II (372 KLD + 532 KLD) and Phosphoric Acid plant			
Sulphates	(191KLD).			

III. Total Pollution load (Kg/ton of product) (For all manufacturing process and Utilities)

Details	Existing			Proposed*		
	Qty of Effluent in KLD (----- KL/ton of product)			Qty of Effluent in KLD (----- kl/ton of product)		
	Pollution Load before treatment (kg/day) Kg/Ton	Pollution load after treatment Kg/Ton	Performance efficiency. (%) [(2-3)/2*100]	Pollution load before treatment Kg/Ton	Pollution load after treatment Kg/Ton	Performance efficiency. (%) [(5-6)/5*100]
1	2	3	4	5	6	7
BOD	Nil					
COD						
TSS						
TDS						
Chlorides						
Sulphates						

Boiler blow down and cooling tower bleed off is included in the calculation of all the above parameters *

4. AIR POLLUTION

Existing

S. No.	Source of emission	Fuel consumption	Stack Height (m)	Stack diameter (m)	Velocity (m/s)	Pollutant Conc. mg/Nm ³				
						PM	SO ₂	NO _x	F	NH ₃
Process stacks and Utility Stacks										
1	Sulfuric Acid Plant – I	-	38.2	1.4	16.5	-	320	6	-	-
2	Sulfuric Acid Plant- II	-	50	1.15	15.8	-	504	12	-	-
3	Phosphoric Acid Plant	-	36	0.75	9.83	3	-	-	6	-
4	Ball mill in Phosphoric Plant	-	24	0.6	22.68	48	-	-	-	-
5	Ammonium Phosphate Potash Sulphate	2.99 T/D Furnace oil	49	1.7	43.54	120	-	-	1	41
6	Bagging Plant	-	35	0.6	-	-	-	-	-	-
7	Sulfuric Acid Plant – steam Header	-	10	0.15	-	-	-	-	-	-
8	CPP Steam Header	-	15	0.15	-	-	-	-	-	-
9	MED Steam Header	-	8	0.15	-	-	-	-	-	-
10	DG Set – 1000 KVA	0.15 T/D Diesel	10.4	0.6	24.05	14	9	196	-	-



TAMIL NADU POLLUTION CONTROL BOARD

II) Pollution Load (Existing)

S. No.	Source of emission	Pollution load before treatment Kg/Ton of product					Pollution load after treatment Kg/Ton of product				
		PM	SO ₂	NO _x	F	NH ₃	PM	SO ₂	NO _x	F	NH ₃
Fuel Gas Stacks & Process gas stacks											
1	Sulfuric Acid Plant – I	-	-	-	-	-	-	2.251	0.042	-	-
2	Sulfuric Acid Plant- II	-	-	-	-	-	-	1.737	0.041	-	-
3	Phosphoric Acid Plant	-	-	-	-	-	0.005	-	-	0.010	-
4	Ball mill in Phosphoric Plant	-	-	-	-	-	0.128	-	-	-	-
5	Ammonium Phosphate Potash Sulphate	-	-	-	-	-	0.978	-	-	0.008	0.334
6	Bagging Plant	-	-	-	-	-	-	-	-	-	-
7	Sulfuric Acid Plant – steam Header	-	-	-	-	-	-	-	-	-	-
8	CPP Steam Header	-	-	-	-	-	-	-	-	-	-
9	MED Steam Header	-	-	-	-	-	-	-	-	-	-
10	DG Set – 1000 KVA	-	-	-	-	-	0.001	0.001	0.022	-	-

III) Details of Proposed Emission sources:

S. No.	Source of emission	Fuel consumption	Stack Height (m)	Stack diameter (m)	Velocity (m/s)	Pollutant Conc. mg/Nm ³				
						PM	SO ₂	NO _x	F	NH ₃
Process stacks and Utility Stacks										
1	Sulfuric Acid Plant – I	-	38.2	1.4	16.5	-	320	6	-	-
2	Sulfuric Acid Plant- II	-	50	1.15	15.8	-	504	12	-	-
3	Phosphoric Acid Plant	-	36	0.75	9.83	3	-	-	6	-
4	Ball mill in Phosphoric Plant	-	24	0.6	22.68	48	-	-	-	-
5	Ammonium Phosphate Potash Sulphate	2.77 T/D Furnace oil	49	1.7	43.54	11 8	-	-	1	40.4
6	Bagging Plant	-	35	0.6	-	-	-	-	-	-
7	Sulfuric Acid Plant – steam Header	-	10	0.15	-	-	-	-	-	-

8	CPP Steam Header	-	15	0.15	-	-	-	-	-	-
9	MED Steam Header	-	8	0.15	-	-	-	-	-	-
10	DG Set – 1000 KVA	0.15 T/D Diesel	10.4	0.6	24.05	14	9	196	-	-

IV) Pollution Load (Proposed)

S. No.	Source of emission	Pollution load before treatment Kg/Ton of product					Pollution load after treatment Kg/Ton of product				
		PM	SO ₂	NOx	F	NH ₃	PM	SO ₂	NOx	F	NH ₃
Fuel Gas Stacks & Process gas stacks											
1	Sulfuric Acid Plant – I	-	-	-	-	-	-	2.251	0.042	-	-
2	Sulfuric Acid Plant- II	-	-	-	-	-	-	1.737	0.041	-	-
3	Phosphoric Acid Plant	-	-	-	-	-	0.005	-	-	0.010	-
4	Ball mill in Phosphoric Plant	-	-	-	-	-	0.128	-	-	-	-
5	Ammonium Phosphate Potash Sulphate	-	-	-	-	-	0.724	-	-	0.006	0.247
6	Bagging Plant	-	-	-	-	-	-	-	-	-	-
7	Sulfuric Acid Plant – steam Header	-	-	-	-	-	-	-	-	-	-
8	CPP Steam Header	-	-	-	-	-	-	-	-	-	-
9	MED Steam Header	-	-	-	-	-	-	-	-	-	-
10	DG Set – 1000 KVA	-	-	-	-	-	0.001	0.0009	0.021	-	-

Details of Air Pollution Management:

S. No	Air Pollution Control Description	Existing Products	Proposed Products
1	To remove various pollutants and dust particles from flue gases and control the fumes from the process gases in sulfuric Acid Plants 1 & 2	Alkali Scrubber with stack	Alkali Scrubber with stack
2	To remove various pollutants and dust particles from flue gases and control the fumes from the process in phosphoric Acid Plant.	Wet scrubber with stack	Wet Scrubber with stack



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3	To remove various pollutants and dust particles from flue gases and control the fumes from the process in Ammonium Phosphate Potash Sulphate (APPS) Plant	Wet Scrubber with stack	Wet Scrubber with stack
4	To Remove dust particles and gases from the air Bagging Plant	Dust Collector with stack	Dust Collector with stack
5	To remove dust particles and gases from the air Ball mill	Bag Filter with stack	Bag Filter with stack
6	To remove gases from the air- Sulfuric Acid Plant steam header, CPP Steam Header & MED Steam Header	Steam vent	Steam Vent
7	To control the noise from Unit -DG set	Stack	Stack

Status of Online Connectivity in TNPCB and CPCB – Emission

Station name	Type of monitoring system	Process attached	Parameter monitored	Device make	Device vendor	Last calibrated on
APPS Plant	Emission	Fertilizer – Complex Fertilizer Plant (NPK)	NH ₃ (Ammonia)	SIEMENS	ADAGE Automations	30.06.2022
APPS Plant	Emission		PM	SIEMENS	ADAGE Automations	25.11.2022
Phosphoric Acid Plant	Emission	Fertilizer – Phosphoric Acid plant	Hydrogen Fluoride (HF)	SIEMENS	ADAGE Automations	30.06.2022
Phosphoric Acid Plant	Emission		Particulate Matters (PM)	Forbes Marshall	Forbes Marshall	20.07.2022
Sulfuric Acid Plant - 1	Emission	Fertilizer – Sulphuric acid plant – I	Sulphur-di-oxide (SO ₂)	Emerson	Emerson	13.12.2022
Sulfuric Acid Plant - 1	Emission	Fertilizer – Sulphuric acid plant – II	Sulphur-di-oxide (SO ₂)	Emerson	Emerson	13.12.2022
Time office – SO ₂	Ambient	Time office	SO ₂	Horbia	Sun Technology	21.07.2022
Time office – NH ₃	Ambient		NH ₃	Horbia	Sun Technology	21.07.2022
Pump House – SO ₂	Ambient	Pump House	SO ₂	Horbia	Sun Technology	21.07.2022
Pump House – NH ₃	Ambient		NH ₃	Horbia	Sun Technology	21.07.2022

Hazardous waste generation:

Note: Trade effluent is not generated from the fertilizer plant. The following hazardous waste generated from the plant.

Sl. No.	Details of waste Category wise	Existing (T/T of product)	Proposed* (T/T of product)	Remark If Any	
1.	Schedule I/17. Production of mineral acids	17.2 – Spent Catalyst	0.000031	0.000031	
2.	Schedule I/5. Industrial operations using mineral or synthetic oil as lubricant in hydraulic systems or other applications	5.1- Used or Spent oil	0.000017	0.0000016	
3.	Schedule I/5. Industrial operations using mineral or synthetic oil as lubricant in hydraulic systems or other applications	5.2 – wastes or residues containing oil	0.00001	0.0000098	

B. As per Schedule-II of Hazardous and Other Waste (Management Handling and Transboundary Movement) Rules, 2016

Sl. No.	Details of waste Category wise	Existing (T/T of product)	Proposed* (T/T of product)	Remark If Any	
1.	Schedule-II / Class C: Based on Hazardous Characteristics – Cl- Flammable	37. Total Sulphur – Presence in the wastes	0.0031	0.0031	

The subject was discussed in the PLAC meeting held on 29.05.2023 and after detailed deliberation and discussion with the Industry, the committee inferred that the pollution load has not increased for the proposed enhanced production of Ammonium Phosphate Potash Sulphate from 300000 TPA to 400000 TPA in the existing Chemical Fertilizer Plant by optimizing operation parameters, adopting latest technologies and industrial best practices.

Further, in view of the following facts presented by the industry for NIPL to achieve the proposed enhanced production of Ammonium Phosphate Potash Sulphate from 300000 TPA to 400000 TPA in the existing Chemical Fertilizer Plant, the committee opined that the NIPL can be validated & accepted.

- Increasing Phosphoric Acid concentration 32.13% (Imported 53.5% + In house 25% usage in the ratio 1:3. Reduce water consumption and Fuel Consumption.
- Use of Ammonium sulphate to reduce consumption of Ammonia by 38.8% and sulphuric Acid 61.4% contribute for reduction in stack emissions.
- Fine Generation will be minimized due to usage of Ammonium Sulphate which contributes for reduction in recycle ratio.



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- Reduced Moisture content in the slurry will reduce Fuel Consumption for Dryer and contribute for reducing recycle ratio.
- Installation of On-line monitoring frequency control will improve the screening effectiveness I turn contribute for reducing recycle ratio.
- Installation of On-line tracking of product weightment will contribute for reducing recycle ratio and maintain consistency in the production.
- By implementation of the above technologies and measures Reduction in Recycle Ratio of the plant will be achieved from 3.4 to 2.30%
- By maintaining the reduced Recycle Ratio as 2.30% Production enhancement of Ammonium, Phosphate Potash Sulphate (APPS) from 3,00,000 TPA TO 4,00,000 TPA will be achieved.

In view of the above, the committee decided to certify that there is "No increase in Pollution Load" for the proposed enhanced production of Ammonium Phosphate Potash Sulphate from 300000 TPA to 400000 TPA in the existing Chemical Fertilizer Plant and recommended that the request of the unit for the issue of consent without Environmental Clearance can be considered by the TNPCB subject to the following conditions:

1. Three months after obtaining CTO Expansion from TNPC Board for increased production capacity based on this NIPL certificate, the unit through the QCI consultant M/s. Natureanalytica Envirocare solutions Pvt. Ltd., Rajasthan shall analyse & validate the load based values projected to the 'Pollution Load Assessment Committee' and shall furnish the report to the TNPC Board.
2. The unit shall comply with all the basic conditions imposed in the Environmental Clearance issued by MOEF vide F.No.J-11011/358/2007-IA-II (I) dated: 03.09.2007.
3. The unit shall comply with all existing norms of discharge and emission as well as changes if any made by Authorities like MoEF & CC, CPCB and TNPCB from time to time.
4. The unit shall comply with all the conditions imposed by the TNPCB in the consent order when granted.
5. The TNPCB shall monitor the unit periodically to confirm the real time pollution load after operation.
6. The unit shall not go for any expansion or installation of new machineries without prior consent of the Board.
7. The unit shall under take to work out the pollution loads after commencing the operation of product mix change and submit report to TNPCB.

8. Sewage to be monitored for quantity and quality on monthly basis and the reports to be submitted to TNPCB.
9. The unit shall comply with all the conditions imposed in the office memorandum of MoEF&CC vide.No.J-11011/358/2007-IA-II(I) dated: 03.09.2007.
10. Ambient Air Quality and stack emission to be monitored by external agency once in a month and the reports to be submitted to TNPCB on regular basis.
11. Hazardous wastes to be segregated and stored in designated areas and properly disposed for recycling/TNWML for disposal.
12. The unit shall furnish Environmental Management Plan and 3rd party Audit.
13. The unit shall provide online monitors for ambient and emission parameters and shall make proper connectivity with CAC of TNPCB for continuous monitoring of water and Air Quality.
14. The unit shall connect the parameter of exit velocity from the emission stack with the O2 correction factor with Care Air Centre of TNPCB
15. The unit shall carry out analysis to determine U-238 and Ra-226 content in each imported consignment of rock phosphate as well as in phosphor gypsum produced from its processing and shall be examined by the AERB.
16. The unit shall comply with the consent order conditions, various directions issued by TNPCB/CPCB/NGT etc., from time to time.
17. The unit shall obtain NOC from the Tamil Nadu bio Diversity Board-National Bio diversity Authority if the unit is using any Biological resources or knowledge associated thereto as per the provisions of Biological Diversity Act 2002.
18. As per EIA notification, if on verification the TNPCB holds that the change or expansion or modernization will result or has resulted in increase in pollution load, the exemption claimed under this clause shall not be valid and it shall be deemed that the project proponent was liable to obtain prior Environmental clearance before undertaking such changes or increase , as per the clause (a) of sub para (ii) of para 7 of EIA notification and the provisions of Environment (Protection) Act, 1986 shall apply accordingly.

**TAMIL NADU POLLUTION CONTROL BOARD**

19. It shall be the responsibility of the project proponent to satisfy itself about "no increase in pollution load" as a result of changes, expansion or modernization, as the case may be, before under taking such changes or increase, and the project proponent shall be liable for action under the provisions of the Environment (Protection) Act, 1986 if on verification of facts or claim it is found that such change or expansion or modernization involves increase in pollution load.

The receipt of this letter shall be acknowledged

Man
21/7/23
For Member Secretary
du
21/7/2023

Copy to:

1. The Joint Chief Environmental Engineer,
Tamil Nadu Pollution Control Board,
Chennai
2. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Ambattur