

RIL/VCD/HSEF/MoEFCC/144

27.11.2023

To,
Ministry of Environment, Forest and Climate Change,
Integrated Regional Office (IRO),
Aranya Bhawan, Near CH-3 Circle, Sector 10A,
Room No 407, Gandhinagar
Gujarat - 382010

Sub.: Half Yearly Environmental Clearance Compliance Report for the period April'2023 to Sept.'2023.

Ref.: (I) EC Order No. J-11011/247/2007-IA - II (I), dated 19.06.2008.
(II) EC Amendment Order No. J-11011/24/2011-IA - II (I), dated 03.02.2015.

Dear Sir,

This has reference to above mentioned EC order, we are submitting herewith half yearly Environmental Clearance compliance report for the period of April'2023 to Sept.'2023.

Kindly request to acknowledge the same.



Thanking you,

For Reliance Industries Limited
(Vadodara Composites Division)



Authorized Signatory

Encl.: As above.

Environmental Clearance Compliance Report

Half yearly compliance report, for the period April'2023 to Sept.'2023 of Environmental Clearance Order No. J-11011/247/2007-IA II(II) dated June 19, 2008 granted to erstwhile M/s. Kemrock Industries and Exports Ltd., Village - Asoj, Vadodara - Halol Express Way, Taluka - Waghodia, Dist.-Vadodara, 391510 (Now, M/s. Reliance Industries Ltd. – Vadodara Composites Division)

Sr. No.	Conditions	Compliance Status																																																							
2	The ministry of Environment and Forest has examined the proposal. It is noted that proposal of M/s. Kemrock Industries & Exports Limited is for manufacturing of product like Pultruded Grating, Moulding Grating, Phenol Formaldehyde Resin, Unsaturated polyester Resin, Epoxy Resin and Carbon Fibre. The production capacity will increase from 1100 MTPM to 6100 MTPM. Total plot area is 2.17 ha. Out of which 1.25 ha. has been developed as green belt. The industry is 100% EOU. The cost of project is 97.45 crores.	Noted.																																																							
3	The present and proposed increased capacity of various products are as below.	Noted & being complied. During compliance period no production of Phenol Formaldehyde Resin, Epoxy Resin & Carbon Fibre.																																																							
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Sr. No.	Conditions	Compliance Status
3	<p>It is noted that total water requirement of 735 m³/day will be met from the ground water source and Sardar Sarovar Nigam. The effluent after primary, secondary and tertiary will be sent to CETP of M/s. Enviro Infrastructure Co Ltd., Umaraya, 50% of treated effluent will be recycled and remaining will be sent to CETP. Power requirement of 6000 KVA will be sourced from the GSEB. 2 DG sets of 750 KVA will be installed. IBR Boiler and thermic fluid heater will be the main source of air pollution. For control of particulate emission from the boiler and thermic fluid heater, multi cyclone separator will be installed. Wet scrubber using a water as scrubber media will be installed to control emission from the spinning process and incinerator. Solid waste would be generated in the form of ETP sludge (7.2 MTPA), salt cake (38.0 MTPA), distillate residue (2.5 MTPA), distillation salt from MEE (378 MTPM), used resin (6 MTPA), 3.95 KLPA of used/spent oil and 14640 no./annum of discarded containers, ETP sludge, salt cake, distillation residue and filter cake will be sent to TSDF of M/s. Nandesari Environment Control Ltd. for secured land filling. Used/spent oil will be sent to TSDF for incineration or sold to CPCB approved recyclers. Recovered solvents 67 MTPM of IPA, 66 MTPM of acrylonitrile and 1460 MTPM of dimethyl acetamide will be used in the next batch.</p>	<p>Being complied. Present water requirement is well below 735 m³/day, which is sourced from ground water. At this stage on average basis only 2.0 KLD effluent get generated from Unsaturated polyester Resin Plant & utility. Effluent generated is being treated at existing ETP plant. Treated water confirming CETP inlet norms is regularly transfer to CETP of M/s. Enviro Infrastructure Co. Ltd (EICL), Umaraya, Taluka - Padra, Dist. Vadodara for further treatment. Designated tanker have been deployed through EICL authorized transporter for transportation of effluent to CETP. For control of particulate matter from thermic fluid heater, multi cyclone separator & mechanical Dust collector have been installed. Power requirement is being sourced from GSEB and stand by DG sets are provided in case of power failure. No effluent & emission from spinning process & incinerator as Carbon Fiber plant was not operational during compliance period. Hazardous waste generated from ETP in the form of ETP sludge is being disposed at TSDF of M/s. Nandesari Environment Control Ltd. Used Oil generated from plant is being sold to authorized used oil recycler. Used Resin (i.e. Resin contaminated Haz. waste) generated is being disposed through co-processing at cement plant.</p>

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4	The project activity is listed at S. No. 5(f) under Category 'A' The proposal was considered and appraised at Centre in 81 st meeting of the Expert Appraisal Committee (Industry) held during 12-14 th May'2008. Public hearing for the proposed project was conducted on 13 th February 2008.	Noted.
5	Based on the information submitted by the Project Authorities, the Ministries of Environment and Forests hereby accorded the Environmental Clearance to the above project under the provision of EIA Notification dated 14 th September,2006 subject to compliance of the following specific and general conditions.	Noted.
A. SPECIFIC CONDITION		
1	The effluent generation shall not exceed 204 m ³ /day. The process effluent after primary, secondary and tertiary treatment and meeting the prescribed standards shall be disposed in the CETP of M/s. Enviro Infrastructure Co. Ltd., Umaraya. The company shall install two new ETP's. Measures shall be taken recycling of treated effluent for industrial use to the extent possible. The domestic effluent after treatment in the STP shall be used for green belt development.	<p>Being complied.</p> <p>At this stage on daily average basis only 2.0 KLD effluent generated from Unsaturated polyester-Resin Plant & utility. Effluent generated is treated at existing ETP plant. Treated water confirming CETP inlet norms is regularly transfer to CETP of M/s. Enviro Infrastructure Co. Ltd (EICL), Umaraya, Taluka - Padra, Dist. Vadodara for further treatment.</p> <p>Sewage generated is being treated at STP plant & treated sewage water confirming the permissible limit is utilized for green belt development.</p>

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II	Process emission in the form of CO, CO ₂ , NO _x from the spinning process, incinerator and oxidation oven shall be scrubbed with wet scrubber using water as scrubber media. Particulate emissions from the thermic fluid heaters and IBR boilers shall be controlled by Multi-cyclone separators and emissions shall be discharged through each stack of 30 m height and emission shall confirm to the prescribed standards. Emission from the DG sets shall be controlled by installation of stacks as per the CPCB norms.	Being complied. During compliance period spinning process, incinerator and oxidation oven were not in operation. Only Thermic Fluid Heater stack & DG (Standby) stacks were in operation. For the operational stack adequate stack height have been provided and regular emission monitoring is being performed. Six monthly Stack Emission Monitoring summary is attached as Annexure- I .
III	The company shall undertake measures for solvent recovery and chilled brine secondary condensers shall be provided for control of evaporation of low boiling solvents. Spent solvents shall be recovered as far as possible and recovery shall not be less than 98 percent. All venting equipment shall have vapour recovery system.	During compliance period Epoxy Resin Plant & Carbon Fiber Plant were not in operation, so there were no generation of spent solvent.
IV	Regular monitoring of HC and VOC shall be carried out at all vents in work zone area and in the ambient air at probable locations in and around the plant.	Regular Ambient air quality monitoring is being done for various stipulated parameter by GPCB. Six monthly AAQ Monitoring summary is attached as Annexure- I .

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Sr. No.	Conditions	Compliance Status
V	Fugitive emission in the work zone environment, product, raw material storage area etc. shall be regularly monitored. The section hood shall be connected to main headers leading through scrubber system shall be provided to control the fugitive emissions. The emissions shall conform to the limit imposed by GPCB.	Six monthly ambient air quality summary is attached as Annexure I . Scrubber provided at carbon fiber plant was not in operation during compliance period as carbon fiber plant was not in operation during compliance period.
VI	During transfer of materials, spillage shall be avoided and garland drain be constructed to avoid mixing of accidental spillage with domestic waste and storm drains.	Point noted. Dyke wall have been provided for control of accidental spillage at liquid tank farm. Separate storm water drain network is in place across the plant premises.
VII	The project authorities shall develop greenbelt in 33% of project area as per the guideline of CPCB to mitigate the effect of fugitive emissions.	After acquisition of assets from Bank, available greenbelt is being refurbished and further greenbelt improvement work is being undertaken by RIL in phased manner. Total available area under greenbelt is around 46 acre.
VIII	Adequate financial provision shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be diverted for any other purpose.	Noted.
IX	Occupational health surveillance of the workers shall be done on a regular basis and record maintained as per the Factories Act.	Occupation Health Centre is available at site for regular occupational health surveillance. Regular medical checkup of employees and workers are being performed and record are maintained.

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X	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.	In order to deal with possible fire emergency, dedicated fire team have been deployed with qualified staff. Three independent layers of fire protection viz., Portable firefighting equipment, mobile firefighting appliances (Fire tenders with crew) and Fixed Fire Protection System are available along with Pre Incident Plans for credible scenarios.
XI	Rain water harvesting measures shall be undertaken to control the fresh water consumption and recharge the ground water.	Erstwhile M/s. Kemrock Industries and Exports Limited had established rain water harvesting structure within plant premises, 07 nos. rain water harvesting structure are available at site, In addition to this RIL has developed roof top rain water collection and storage system at WMB plant roof top area.
XII	Recommendations made in the EIA/EMP/Risk assessment report and during public hearing shall be complied with.	Noted.
B. GENERAL CONDITION		
I	The project authorities shall strictly adhere to the stipulations of the SPCB/State Government or any statutory body.	Noted & being adhered.
II	No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment Forests. In case of deviations or alteration 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.	Noted.

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III	The project authority shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules,1989 as amended. Authorization from the SPCB shall be obtained for collection, treatment, storage and disposal of hazardous wastes.	Point noted & being complied. Hazardous waste authorisation have been obtained from GPCB.
IV	Ambient air quality monitoring stations shall be set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the State Pollution Control Board.	Being complied. Ambient air quality monitoring stations have been set up in downwind, upwind and cross wind direction, wherein regular ambient air quality monitoring is being performed through NABL accredited laboratory M/s. Kadam Environment Consultant. Six monthly AAQ Monitoring summary is attached as Annexure - I.
V	For control of process emission, stacks of appropriate height as per the Central Pollution Control Board guideline shall be provided. The scrubber water shall be sent to ETP for further treatment.	For control of process emission adequate stack height have been provided. No scrubber water generation, as scrubber provided at carbon fiber plant was not in operation during compliance period.

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VI	<p>The company shall undertake following Waste Minimization measures:</p> <ul style="list-style-type: none"> ▪ Metering of quantum of active ingredients to minimize waste. ▪ Reuse of by-product from process from the process as raw material or as raw material substitution in other process. ▪ Maximize recoveries ▪ Use of automated material transfer systems to minimize spillage ▪ Use of "closed Feed" system in to batch reactors. 	<p>For waste minimization following measures are undertaken :</p> <p>Recyclable material like plastic, paper, metal being separated and stored separately, which is being sent to recycler for recycling.</p> <p>Hazardous waste (i.e. Resin contaminated waste) generated is being disposed through resource recovery initiative (i.e. co-processing at cement plant).</p> <p>Recyclable hazardous waste like used oil, empty contaminated drums, batteries, e-waste is being sent to authorized recycler.</p>
VII	<p>The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous waste in accordance with the Hazardous Waste (Management & Handling) Rules,2003. Authorisation from the SPCB shall be obtained for collections/treatment/storage/disposal of hazardous wastes.</p>	<p>Being complied.</p> <p>Hazardous waste authorisation have been obtained from GPCB.</p> <p>Hazardous waste generated is being disposed at approved TSDF of M/s. Nandesari Environment Control Ltd. & at authorized cement plant for co-processing.</p> <p>Recyclable hazardous waste like used oil, empty contaminated drums, batteries, e-waste is being sent to authorized recycler.</p>
VIII	<p>The overall noise level in and around the plant area shall be kept well within the standards 85 dB(A) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall confirm to the standards prescribed under Environment (Protection) Act, 1986, Rules 1989 viz. 75 db((A) (day time) and 70 db(A) (Night time)</p>	<p>Being complied.</p> <p>Regular ambient noise monitoring is being done at various locations.</p> <p>Six monthly noise monitoring summary is attached as Annexure - II.</p>

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IX	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the environmental management and monitoring functions.	Environmental Management Cell is in place. NABL accredited laboratory M/s. Kadam Environment Consultant have been engaged for regular Environmental parameter monitoring.
X	The implementation of the project vis-à-vis environmental action plans shall be monitored by Ministry's Regional office/SPCB/CPCB. A six monthly compliance status report shall be submitted to monitoring agencies.	Noted & complied. Last six monthly compliance report submitted on 01.06.2023 to Ministry's Integrated Regional Office (IRO).
XI	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at website of the Ministry at 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 news papers that are widely circulated in the region of which one shall be in vernacular language of the locality concerned and copy of the same shall be forwarded to the Ministry's Regional office.	Noted & complied.
XII	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 the project.	Noted. Existing assets of M/s. Kemrock Industries & Export Ltd. have been acquired by RIL through E- auction from consortium of 11 banks lead by Allahabad Bank in the year 2017.
7	The ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted.

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8	The Ministry reserve the right to stipulate additional conditions, if found necessary. The company in a time bound manner shall implement these conditions.	Noted.
9	Any appeal against this environmental clearance shall lie with the National Environment Appellate Authority. If preferred within a period of 30 days as prescribed under section 11 of the National Environment Appellate Authority Act, 1997.	Noted.
10	The above conditions shall be enforced, inter-alia under the provisions of the Water(Prevention & Control of Pollution) Act 1974, Air (Prevention & Control of Pollution) Act 1981, The Environment (Protection) Act 1986, Hazardous Wastes (Management & Handling) Rules,2003 and the Public Liability Insurance Act 1991 along with their amendments and rules.	Noted.

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--	<p>This is in continuation of this Ministry's letter referred above and your letter under reference, wherein you have requested for amendment in environmental clearance for end product (i.e. Carbon Fibre) including 3 nos. of equivalent intermediate product (i.e. PA,SAF,PAN Fibre) without changing production capacity granted in earlier environmental clearance. Following products will be manufactured.</p> <table border="1"> <thead> <tr> <th>Sr. No.</th> <th>Product</th> <th>As per EC received</th> <th>Amendment required</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Phenol Formaldehyde Resin</td> <td>300</td> <td>300</td> <td>No change</td> </tr> <tr> <td>2</td> <td>Unsaturated Polyester Resin</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>a. Isophthalic</td> <td>1300</td> <td>1300</td> <td rowspan="3">No change</td> </tr> <tr> <td></td> <td>b. Orthophthalic</td> <td>1600</td> <td>1600</td> </tr> <tr> <td></td> <td>c. Vinyl</td> <td>300</td> <td>300</td> </tr> <tr> <td>3</td> <td>Epoxy Resin</td> <td>1500</td> <td>1500</td> <td>No change</td> </tr> <tr> <td>4</td> <td>Carbon Fibre (Including 3 nos. Intermediate product like PAN,SAF, PAN Fibre)</td> <td>100</td> <td>100</td> <td>Carbon Fibre including intermediate products</td> </tr> </tbody> </table>	Sr. No.	Product	As per EC received	Amendment required	Remarks	1	Phenol Formaldehyde Resin	300	300	No change	2	Unsaturated Polyester Resin					a. Isophthalic	1300	1300	No change		b. Orthophthalic	1600	1600		c. Vinyl	300	300	3	Epoxy Resin	1500	1500	No change	4	Carbon Fibre (Including 3 nos. Intermediate product like PAN,SAF, PAN Fibre)	100	100	Carbon Fibre including intermediate products	<p>Noted & being complied.</p> <p>During compliance period no production of Phenol Formaldehyde Resin, Epoxy Resin & Carbon Fibre.</p>
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2	The proposal referred above was placed before the reconstituted Expert Appraisal Committee (Industry) in its 28 th , 36 th , 1 st & 19 th meetings held during 17 th -18 th October'2011, 11 th -12 th June,2012,24 th -25 th September,2012 and 28 th -30 th May,2014 respectively. The committee exempted project from EIA/EMP report preparation and public hearing as per section 7(ii) of EIA Notification, 2006. After detailed deliberations, the committee recommended for the amendment in the EC for as referred above subject to the specific and general environmental conditions.	Noted.
3	The Ministry accepts the recommendations of the REAC (Industry) for amendment in the existing environmental clearance subject to the specific and general environmental conditions.	Noted.

A. SPECIFIC CONDITION

I	Monitoring report of vent attached to solvent recovery plant, incinerator, HC & VOC, noise levels, AAQ and common stack attached to the Thermic Fluid Heater shall be submitted regularly.	During compliance period solvent recovery plant & Incinerator were not in operation as Epoxy Plant & Carbon Fiber were not in operation. Regular Ambient air quality monitoring is being done for various stipulated parameter by GPCB. Thermic fluid heater stack being monitored regularly. Monthly Ambient air quality & stack emission monitoring report are being regularly submitted to GPCB. Six monthly AAQ & Stack Emission Monitoring summary is attached as Annexure – I.
II	Copy of the Policy under PLI Act,1991 shall be submitted to MoEF regional office, Bhopal within 1 month from date of issue of letter.	Copy of PLI Policy of Reliance Industries Ltd. is attached as Annexure - III.
III	Uploading of EC and compliance report along with analytical report shall be uploaded on the company's website.	Noted and being complied.