

TGV SRAAC LIMITED

Sy. No. 51/1, 2A, 2B, 2C1, 2C2, 2C3, 56/1, 58/1, 59/1, 60, 62/3/2D2, 2C1/A2, 2C1/A3, 2C2/C,
2G/1, 2E, 2F, 1A, 1B, 62A, 62 B, 63, 64, 70/C2, 72/P, GONDIPARLA VILLAGE,
KURNOOL MANDAL AND DISTRICT, ANDHRA PRADESH

CFO Order No. APPCB/KNL/KNL/16332/CFO&HWA/HO/2021, DATE: 16.07.2021
COMPLIANCE REPORT OF CFO (Chlor-Alkali - 280 TPD)

S.No.	Conditions	Compliance
SCHEDULE A		
1.	Any up-set condition in any industrial plant / activity of the industry, which result in, increased effluent / emission discharge and/ or violation of standards stipulated in this order shall be informed to this Board, under intimation to the Collector and District Magistrate and take immediate action to bring down the discharge / emission below the limits.	Condition noted and same will be followed.
2.	The industry should carryout analysis of waste water discharges or emissions through chimneys for the parameters mentioned in this order on quarterly basis and submit to the Board.	Being Complied Analysis of wastewater was being carried out in In-house laboratory and results are submitting to RO, APPCB on monthly basis. Continuous online (24x7) monitoring system installed for 100 TPH, 110 TPH and 42 TPH and results are within standards.
3.	All the rules & regulations notified by Ministry of Law and Justice, Government of India regarding Public Liability Insurance Act, 1991 should be followed as applicable	Agreed to comply Will follow rules & regulations notified by Ministry of Law and Justice. GoI regarding PLI. valid till 28.05.2024
4.	The industry shall install display boards at outside the factory containing information related to effluent discharge, air emissions and waste generation, the format is available in the APPCB website.	Complied. We have displayed two sign boards (6 X 4 feet each) at the main gate indicating the products being manufactured, hazardous waste quantities generated and validity of the CFO.
5.	Notwithstanding anything contained in this consent order, the Board hereby reserves the right and powers to review / revoke any and/or all the conditions imposed herein above and to make such variations as deemed fit for the purpose of the Acts by the Board.	Condition noted and we will adhere revisions to the existing consent order issued by the Board from time to time.
6.	The industry shall ensure that there shall not be any change in the process technology, source & composition of raw materials and scope of working without prior approval from the Board.	Condition Noted and same will be followed.
7.	The applicant shall submit Environment statement in Form V before 30th September every year as per Rule No.14 of E(P) Rules, 1986 & amendments thereof	Complied. Submitted in Form-V, dated 30.06.2023 as per Rule No.14 of E(P) Rules, 1986 & amendments thereof.
8.	The applicant should make applications through Online for renewal of Consent (under Water and Air Acts) and Authorization under HWM Rules at least 120 days before the date of expiry of this order,	Complied. All the applications fresh or renewal of any consents will be applied over AP Single Desk web portal.

S.No.	Conditions	Compliance
	along with prescribed fee under Water and Air Acts and detailed compliance of CFO conditions for obtaining Consent & HW Authorization of the Board. The industry should immediately submit the revised application for consent to this Board in the event of any change in the raw material used, processes employed, quantity of trade effluents & quantity of emissions. Any change in the management shall be informed to the Board. The person authorized should not let out the premises / lend / sell / transfer their industrial premises without obtaining prior permission of the State Pollution Control Board	
9.	The industry should immediately submit the revised application for consent to this Board in the event of any change in the raw material used, processes Employed, quantity of trade effluents & quantity of emissions. Any change in the management shall be informed to the Board. The person authorized should not let out the premises / lend / sell / transfer their industrial premises without obtaining prior permission of the State Pollution Control Board	Condition Noted and same will be followed.
10.	Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules 1982, to Appellate authority constituted under Section 28 of the Water(Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air(Prevention and Control of Pollution) Act, 1981.	Condition Noted.
11.	The industry shall be liable to pay Environmental Compensation / Other Environmental Taxes, if any environmental damage caused to the surroundings, as fixed by the Collector & District Magistrate or any other competent authority as per the Rules in vogue	Condition Noted. All necessary pollution control measures will be implemented based on the guidelines and standards prescribed by the CPCB, MoEFCC, and APPCB.
12.	The industry may explore the possibility of tapping the solar energy for their energy requirements.	Complied. Installed 22.5 MW solar panel-based power plant to meet part of our power requirements.
13.	The industry should educate the workers and nearby public of possible accidents and remedial measures.	Complied. Conducting mock drills and safety training programs are conducting at regular intervals and submitted reports to the RO: Kurnool.
SCHEDULE - B		
1.	The Board vide order dated 07.08.2018 issued CFO (Expansion) to the industry to manufacture Chlor-Alkali Chemicals i.e., Caustic Soda lye (or) Flakes or Potassium Hydroxide Lye (or) Flakes (100% basis)	Complied. Obtained CFO for 2 x 15 lakh k.cal/hr salts furnaces, Thermo pack unit - 20 Lakh K.Cal/hr & DG Set of Capacity - 500 KVA

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	<p>- 280 TPD, Barium Sulphate - 5 TPD and Sodium Sulphate - 10 TPD which was valid upto 31.05.2019 and the validity of CFO (Expansion) was extended through auto renewal on 15.04.2019 for a period up to 31.05.2021. The industry also obtained CFO (amendment) on 28.08.2018 for inclusion of Liquid Chlorine - 217 TPD, Hydrochloric Acid (100% basis) - 35 TPD, Sodium Hypochloride (100% C12 basis) - 5. Now the industry applied for renewal of CFO (Expansion), for a period upto 31.05.2026, for a total project cost of Rs. 109.6 Crs, with a total area of 376.58 acres. The issue of CFO was placed in the CFO committee meeting held on 05.05.2021 and the committee observed 6 non-compliance. The committee recommended to issue Renewal of CFO & HWA (Expansion) order to the industry for a period up-to 28.02.2026, so as to tally the date with the existing CFO order, with time bound conditions for the non-compliances, subject to submission of Bank Guarantee of Rs. 2 Lakhs towards compliance of time bound conditions for the following non-compliances: 1) As informed by the industry, the industry shall apply CFE & CFO of the Board for the new salt furnaces 55 lakhs K.cal/hr x 2 Nos. (Fuel Hydrogen), Thermo pack unit - 20 Lakh K.Cal./hr & DG Set of Capacity - 500 KVA, by 12.05.2021 and 2) As informed by the industry, The industry shall install fluorescent wind vane at the highest point in the industry premises so as to escape, chlorine leakages occurs (if any), in the opposite direction to avoid adverse impacts on the workers and surrounding residents, by 05.06.2021</p>	<p>vide CFO order no. APPCB/KNL/KNL/16322/CFO&HWA/HO/1987 dated 01.04.2021.</p> <p>Installed fluorescent wind vane at the highest point in the industry premises so as to escape, chlorine leakages occurs (if any), in the opposite direction</p>
2.	The industry shall comply with the following conditions within time limits stipulated, failing which the bank guarantees of Rs. 2 lakhs submitted by the industry will be forfeited without any notice:	Complied.
i	The industry has installed new salt furnaces 55 lakhs K.cal/hr x 2 Nos. (Fuel Hydrogen), Thermo pack unit - 20 Lakh K.Cal./hr & DG Set of Capacity - 500 KVA in addition to the air pollution sources permitted in the CFO order dated. 26.02.2014 and the industry have not obtained CFE and CFO of the Board. The industry shall obtain CFE & CFO of the Board for the new salt furnaces 55 lakhs K.cal/hr x 2 Nos. (Fuel- Hydrogen), Thermo pack unit - 20 Lakh K.Cal./hr & DG Set of Capacity - 500 KVA, immediately	<p>Complied.</p> <p>Obtained CFO for 2 x 15 lakh k.cal/hr salts furnaces, Thermo pack unit - 20 Lakh K.Cal./hr & DG Set of Capacity - 500 KVA vide CFO order no. APPCB/KNL/KNL/16322/CFO&HWA/HO/1987 dated 01.04.2021.</p>
ii	The industry shall install fluorescent wind vane at the highest point in the industry premises so as to escape, chlorine leakages occurs (if any), in the opposite direction to avoid adverse	<p>Complied.</p> <p>Installed fluorescent wind vane at the highest point in the industry premises so as to escape, chlorine leakages occurs (if</p>

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	impacts on the workers and surrounding residents, by 05.06.2021	any), in the opposite direction.
3.	On 12.04.2021, the Regional office, Kurnool verified the Real Time Data generated online continuous Effluent & Emission Monitoring Systems pertaining to M/s. TGV SRAAC Ltd., from website of appcb.glensserver.com to know the HCL & Chlorine emission values for the last one year i.e., from 01.01.2020 to 12.04.2021, As per the data captured from this website, it is noted that, from 01.01.2020 to 12.04.2021, with regard HCL emission, the data displayed only in 7 months and with regard to total chlorine emissions no values were recorded in Real time data and showing as NA for last one year four months. The industry has not justified the reasons for no display of values and also industry has not rectified lapses related to process emissions monitoring system. The industry shall maintain the process emissions monitoring system, ensure the data will always be displayed properly and submit the compliance report to RO, Kurnool.	Complied. Continuous online (24x7) monitoring system installed for 100 TPH, 110 TPH and 42 TPH and connected to PCB server and results are within standards.
4.	Not complied with the condition of "The industry shall not store the treated/ untreated effluents in the unlined lagoons and to empty the unlined lagoons and dismantle the unlined lagoons within one month" and the industry storing the unlined lagoons belongs to their sister concern unit namely M/s SRHHL. The industry shall not store the treated/untreated effluents in the unlined lagoons. The updated compliance report on emptying and dismantle of unlined lagoons shall be submitted to RO and ZO Kurnool.	Complied. Unlined lagoons are dismantled and same submitted to RO: Kurnool.
5.	The industry has to take up the following mitigation measures (Where significant adverse effects are identified, description of the remedial measures to be taken to avoid, reduce those effects):	
	i The industry has to take up regular preventive maintenance to check the functioning of chlorine sensors and also install additional sensors to identify the fugitive emissions/ leakages of chlorine and HCL within the plant premises & outside the plant premises i.e., near the habitation and maintain the records for the same.	Complied. Calibration of chlorine sensors will be done on time to time basis. Installed Chlorine, Hydrogen and HCl sensors at storage and process area to identify any leakages.
	ii The industry shall install leak proof pipe valves etc., to avoid leakages and shall carryout regular preventive measures.	Complied. Complete closed system and DCS system is used for process, chlorine, and hydrogen and HCl storage.
	iii The industry shall operate the 4 MLD Effluent Recycling plant continuously and effectively to cater all the effluents generated from Chlor-alkali, Oil & fatty acid division & Power plant	Complied. Established ETP of 4 MLD capacity for treatment of wastewater from Chlor-Alkali, Power plant division & CMS

S.No.	Conditions	Compliance
	and shall not discharge any waste water to outside the factory premises as Tunghabadra river is at distance of 600mtrs.	division. No wastewater discharged outside the factory premises.
	iv Chemical drums and other drums shall be stored in closed roof and on the concrete platform only. The Platform shall be provided with sufficient dyke wall and effluent collection system.	Complied. Drums are stored on elevated concrete platform with dyke and leachate collection provision.
	v The industry shall give more emphasis on improving housekeeping all around the unit.	Complied. Good housekeeping is being maintained all around the plant area.
	vi The industry shall implement all the recommendations made in the Safety Audit report and other required measures to avoid accidents, Environmental Damages	Complied. All the recommendation made in annual safety audit conducted during 2023 by third party is implemented.
	vii The industry shall update the onsite and offsite emergency plans, risk analysis reports periodically and shall comply the MSIHC Rules 1989, carryout calibration of safety equipments and leak detection system at regular intervals and shall certify the same with Factories Department and submit the certified copies to the Board office, Zonal and Regional offices on regular basis.	Being Complied We will follow all the rules and guidelines under manufacture, Storage and import of hazardous Chemicals (MSIHC) Rules, 1989 and transportation of Hazardous Chemicals Shall be as per the Motor Vehicle Act (MVA), 1989.
6.	Not complied with the condition of "The Expert committee will study the issue of transferring waste stored in the pits to the newly constructed landfill. The industry shall comply with the recommendations of the committee" and no expert Committee was visited the industry to study the issue of transferring waste stored in the pits to the newly constructed landfill. As per the records industry has not submitted any compliance report with regard to the committee and its recommendations. The Expert committee will study the issue of transferring waste stored in the pits to the newly constructed landfill. The industry shall comply with the recommendations of the committee. The industry shall submit compliance report with regard to committee and its recommendations to RO, Kurnool.	Will be complied.
7.	Not uploaded the six monthly compliance reports in APPCB Website. The industry shall upload the six monthly compliance reports in APPCB Website, immediately and thereafter once in six months.	Complied. Six months compliance uploaded at at website i.e., https://pcb.ap.gov.in .

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WATER POLLUTION																							
1.	<p>The source of water is Infiltration well from Tungabhadra river. The following is the permitted water consumption;</p> <table border="1"> <thead> <tr> <th>S.No</th> <th>Purpose</th> <th>Quantity (KLD)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Process</td> <td>390</td> </tr> <tr> <td>2</td> <td>Floor Washings</td> <td>5</td> </tr> <tr> <td>3</td> <td>Pump Gland Cooling</td> <td>25</td> </tr> <tr> <td>4</td> <td>Cooling make-up</td> <td>275</td> </tr> <tr> <td>5</td> <td>Domestic</td> <td>5</td> </tr> <tr> <td></td> <td>Total</td> <td>700</td> </tr> </tbody> </table>	S.No	Purpose	Quantity (KLD)	1	Process	390	2	Floor Washings	5	3	Pump Gland Cooling	25	4	Cooling make-up	275	5	Domestic	5		Total	700	<p>Will be complied. The water consumption is not exceeding 700 KLD as mentioned in consent. We have obtained permission from Tungabhadra River for withdraw of 20 MLD of water.</p>
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1	Process	390																					
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2.	The industry shall maintain properly the separate flow meters for assessing the quantity of water used for the above purposes and maintain records	<p>Complied. Provided digital water meter with totalizers at raw water sump, process, washings, cooling tower and boiler feed and domestic.</p>																					
3.	The industry shall provide flow meters with totalizers at the inlet and outlet of effluent recycling plant and treated water utilization sources.	<p>Complied. Provided flow meters with totalizers at the inlet and outlet of ETP.</p>																					
4.	The industry shall not discharge any waste water outside the premises and shall maintain Zero Liquid Discharge System.	<p>Complied. No effluent is discharged outside the plant premises. Total effluent is treated in ZLD system and reused.</p>																					
5.	The Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to low TDS collection tank for treatment and disposal.	<p>Complied. Detoxification provision with concrete platform and dyke walls for Container & Container washings is provide. Wastewater sent to LTDS effluent treatment plant and recycles the same.</p>																					
AIR POLLUTION																							
6.	The industry shall regularly operate the air pollution control equipment's provided to the existing boilers of capacity 42 TPH, 100 TPH & 110 TPH and meet the standards prescribed in the CFO& HWA order dt. 26.02.2014.	<p>Complied. Provided ESP as APC to 42 TPH, 100 TPH & 110 TPH boilers. Continuous online (24x7) monitoring system installed for 100 TPH, 110 TPH and 42 TPH and results are within standards.</p>																					
7.	<p>The industry shall comply with ambient air quality standards of PM10 (Particulate Matter size less than 10mm) - 100 mg/ m³; PM2.5 (Particulate Matter size less than 2.5 mm) - 60 mg/ m³; SO2 - 80 mg/ m³; NOx - 80 mg/m³, outside the factory premises at the periphery of the industry. Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No. B-29016/20/90/PCI-I, dated 18.11.2009.</p> <table border="1"> <tbody> <tr> <td rowspan="2">Noise Levels</td> <td>Day Time (6AM to 10PM)</td> <td>75 dB(A)</td> </tr> <tr> <td>Night Time (10PM to 6AM)</td> <td>70 dB(A)</td> </tr> </tbody> </table>	Noise Levels	Day Time (6AM to 10PM)	75 dB(A)	Night Time (10PM to 6AM)	70 dB(A)	<p>Complied. Installed continuous Ambient Air Quality monitoring station and results are found to be within the NAAQ standards. Noise level monitoring is being carried out MoEF&CC recognized third party laboratory and noise levels are within the standards.</p>																
Noise Levels	Day Time (6AM to 10PM)		75 dB(A)																				
	Night Time (10PM to 6AM)	70 dB(A)																					
8.	The industry shall comply with emission limits for	<p>Complied.</p>																					

S.No.	Conditions	Compliance
	DG sets of capacity upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Act Rules. In case of DG sets of capacity more than 800 KW shall comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.	Noted and same will be followed.
GENERAL		
9.	The industry shall not manufacture any product, other than those mentioned in this order, without CFE & CFO of the Board. The industry shall not increase the capacity beyond the permitted capacity mentioned in this order, without obtaining CFE & CFO of the Board.	Condition Noted and same will be followed.
10.	The industry shall install and operate multi stage scrubbers for scrubbing of process emissions at all emission sources. The details of chemicals consumption used in the scrubber should be recorded and kept accessible for the inspecting officials of the Board.	Complied. Installed 3 stage chlorine neutralization scrubbing system to mitigate process emissions. Records being maintained for caustic consumed for neutralization and power consumed for chlorine neutralization plant.
11.	The industry shall regularly operate scrubbers for scrubbing of Chlorine emissions generated from cell house, de-chlorination unit, chlorine liquefaction & chlorine storage and filling areas of chlor-alkali division.	Complied. Installed 3 stage chlorine neutralization scrubbing system to mitigate chlorine emissions from cell house, de-chlorination unit, chlorine liquefaction & chlorine storage and filling areas of chlor-alkali division
12.	The industry shall maintain the following records and the same shall be made available to the inspecting officers of the Board:	Complied. All the records will be made available during site inspection.
	a Daily production details (ER-1 Central Excise Returns).	ER-1 Central Excise Returns are being maintained
	b Characteristics of effluents and emissions	In-house laboratory analytical results made available.
	c Quantity of Effluents generated, effluent evaporated in MEE, recycled/reused.	Maintenance and operation staff of ETP is maintaining records for effluents generated, evaporated, MEE condensate collection and evaporation salts generated.
	d Log Books for pollution control systems	Energy readings records of APC are made available at power plant.
	e Hazardous/non-hazardous solid waste generated and disposed	Manifest copies of hazardous waste disposed are submitting to APPCB.
	f Manifest copies of effluents/hazardous waste	Manifest copies of hazardous waste disposed are submitting to APPCB.
	g Inspection book.	Inspection Observation File is maintained
13.	The industry shall submit compliance report on the conditions mentioned in the consent order every 6 months to the Regional Office/Zonal Office.	Complied. Submitted Six months compliance reports for the first half year by NABL accredited third party and same was uploaded at appcb.gov.in website.

S.No.	Conditions	Compliance
14.	The industry shall comply with the Task Force directions issued by the Board order dt. 18.12.2014 & 24.02.2015.	Complied. Submitted compliance report for the Task force directions.
15.	The industry shall comply with the conditions stipulated in the CFO & HWA order dt. 26.02.2014 and submit the updated compliance to RO and ZO Kurnool, immediately.	Complied. Compliance report for the conditions stipulated CFO & HWA order is also uploaded at website i.e., https://pcb.ap.gov.in and submitted to RO and ZO Kurnool.
16.	The industry shall comply with the conditions stipulated in the CFE order dt. 23.05.2018	Being Complied. All the conditions stipulated in the CFE order dt. 23.05.2018 is being complied.
Schedule C: Conditions of Authorization for Occupier Or Operator Handling Hazardous Waste		
1.	The operator should follow the Hazardous & Other wastes (Management and Trans boundary Movement) Rules, 2016 notified by the Ministry of Environment & Forests, Government of India.	Being Complied.
2.	The industry shall not store hazardous waste for more than 90 days as per the Hazardous and Other Wastes (Management & Trans boundary Movement Rules, 2016)	Being Complied. No hazardous waste is stored at site more than 90 days.
3.	The industry shall store Used / Waste Oil and Used Lead Acid Batteries in a secured way in their premises till its disposal to the manufacturers / dealers on buyback basis	Complied. Used oil and batteries are sent to authorize recyclers.
4.	The industry shall maintain 6 copy manifest system for transportation of waste generated and a copy shall be submitted to concerned Regional Office of APPCB. The driver who transports Hazardous Waste should be well acquainted about the procedure to be followed in case of an emergency during transit. The transporter should carry a Transport Emergency (TREM) Card.	Complied. 7 copy manifest system for transportation of waste generated are being maintaining.
5.	The industry shall maintain proper records for Hazardous and Other Wastes stated in Authorization in Form-3 i.e., quantity of Incinerable waste, land disposal waste, recyclable waste etc., and file annual returns in Form-4 as per Rule 20 (2) of the Hazardous and Other waste (Management & Trans boundary Movement Rules, 2016.)	Complied. All the records w.r.t Hazardous and other wastes are being maintained and same will be made available at site.