

## COMPLIANCE REPORT

A	MoEF _ SPECIFIC CONDITIONS	REMARKS
i	<p>The gaseous emissions (PM, RSPM, SO<sub>2</sub>, NO<sub>x</sub> and HCl) from various process units shall conform to the standards prescribed from time to time. The Kerala SPCB may specify more stringent standards from relevant parameters keeping in view the nature of the industry, its size and location. On-line monitoring of various pollutants with centralized data logging for relevant parameters shall be measured and reports submitted to the Ministry's Regional Office at Bangalore / CPCB. HCl in vent gas shall be controlled and kept within the permissible limits. At no time, the emission level shall go beyond the prescribed standards. In the event of failure of any pollution control system (s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.</p>	<p>1) Three numbers of Ambient Air Monitoring Systems were installed at different identified locations around KMML and the data are being forwarded to State Pollution Control Board regularly. The readings are well within the stipulated standards. In addition to this there is a system owned by PCB installed at KMML premises.</p>
ii	<p>The National Ambient Air Quality Standards issued by the ministry vide G.S.R. No. 826(E) dated November, 2009 should be followed</p>	<p>2) The stack monitoring by KSPCB approved external agency is done during the 1<sup>st</sup> half of June 2014 and the reports are received.</p>
iii	<p>Gaseous emissions levels including secondary fugitive emissions from all the sources should be controlled within the latest permissible limits issued by the ministry vide G.S.R 414(E) dated 30th May, 2008 and regulatory monitored. Guidelines / code of practice issued by the CPCB should be followed.</p>	<p>3) HCl in vent gas is scrubbed using Caustic solution, before venting.</p>
iv	<p>Total water requirement shall not exceed 362 m<sup>3</sup>/day. Efforts shall further be made to use maximum water from the rain water harvesting sources. The process effluent after treatment and conforming to the prescribed standard shall be recycled to the maximum extent and the remaining effluent shall be discharged to sea through the existing pipeline. Sanitary sewage should be treated in septic tank followed by soak pit.</p>	<p>1) As our plant is running under trial, the utilization is only 33%. The current average water consumption is in the order of 5.8M<sup>3</sup> / day against our projected requirement of 362M<sup>3</sup> /day.</p> <p>2) Water conservation pond/ rain water harvesting facility with 9000 M<sup>3</sup> capacity (Approx) has been made available.</p> <p>3) The primary Effluent treatment is getting commissioned by 1<sup>st</sup> half of July, where the recycling of treated effluent is envisaged. Now, the process effluent generated is treated to the prescribed standard at our KMML centralised ENP and discharged to sea through our existing pipe line.</p> <p>4) Sanitary sewages are treated in septic tanks followed by soak pit.</p>
v	<p>Risk and Disaster Management plan along with the mitigation measures should be prepared and a copy submitted to the Ministry's Regional office at Bangalore. SPCB and CPCB within three months of issue of environment clearance letter. The company shall undertake measures for emergency preparedness against the impact of Tsunami.</p>	<p>1) The Risk and Disaster Management Plan is prepared.</p> <p>2) Emergency Preparedness against Tsunami is prepared.</p>

vii	All the commitments made to the public during the public hearing / public consultation meeting held on 17th January, 2011 shall be satisfactorily implemented and a separate budget for implementing the same shall be allocated and information submitted to the Ministry's Regional office at Bangalore.	<p><i>As a commitment made during public hearing, following major actions were taken.</i></p> <ol style="list-style-type: none"> <li><i>1. Assistance to nearby hospitals by way of paying salary to one doctor and one pharmacist (≈ ` 40Lkajs) at public health centre,</i></li> </ol>
viii	At least 5% of the total cost of the project should be earmarked towards the Enterprise Social Commitment (ESC) based on Public Hearing issues and item-wise details along with time bound action plan should be prepared and submitted to the Ministry's Regional Office at Bangalore. Implementation of such program should be ensured accordingly in a time bound manner.	<ol style="list-style-type: none"> <li><i>contribution of ` 50 Lakhs for the construction of a ward at Chavara PH Centre, Donation of Ambulance ,etc</i></li> <li><i>2. Contributions for medical assistance to local resident.</i></li> <li><i>3. Company is arranging drinking water supply to nearby area through a pipeline network of approx 80kms.</i></li> <li><i>4. An amount of ` 5.7 Lakhs(approx)has been incurred for setting up Rain water harvesting System to improve ground water replenishment by percolation.</i></li> </ol>
ix	The company shall adopt well laid down corporate environment policy and identified and designate responsible officers at all levels of its hierarchy for ensuring adherence to the policy and compliance with environmental clearance, environmental laws and regulations.	<p><i>KMML is having a well laid Environment Policy</i></p>
x	The company shall submit within three months their policy towards Corporate Environmental Responsibility which should inter-alia address (i) Standard operating process / procedure to bring into focus any infringement/deviation/violation of environmental or forest norms /conditions. (ii) Hierarchical system or Administrative order of the company to deal with environmental issues and ensuring compliance to the environmental norms to the Board of Directors of the company and / or stake holders or shareholders.	<p><i>Environmental Policy is prepared based on the Guidelines and requirements of ISO 14001 International standards with PDCA approach by the following activities.</i></p> <ul style="list-style-type: none"> <li><i>• Planning</i></li> <li><i>• Implementation and Operation</i></li> <li><i>• Checking and Corrective Action</i></li> <li><i>• Management Review</i></li> </ul> <p><b><i>Objectives:</i></b></p> <p><i>To define the components of environmental management.. To prepare an environmental hierarchy.</i></p> <p><i>To prepare a checklist for statutory compliance. To prepare environmental organization.</i></p> <p><i>To prepare a schedule for monitoring and compliance. To establish a watchdog committee voluntarily.</i></p>

<b>B</b>	<b>MoEF GENERAL CONDITIONS</b>	<b>REMARK</b>
i	The project authorities must strictly adhere to the stipulations made by the Kerala state pollution Control Board (KSPCB) and the state Government	<i>The stipulations made by the Kerala state pollution Control Board (KSPCB) and the state Government are</i>
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.	<i>Will be complied</i>
iii	At least four ambient air quality monitoring stations shall be established in the downward direction as well as where maximum ground level concentration of PM, SO <sub>2</sub> and NO <sub>x</sub> are anticipated in consultation with the KSPCB including one ambient air quality monitoring station in the downwind direction. Data on ambient air quality and stack emission should be regularly submitted to this Ministry including its Regional office at Bangalore and the KSPCB/ CPCB once in six months.	<i>1) Three numbers of Ambient Air Monitoring Systems were installed at different identified locations around KMML and the data are being forwarded to State Pollution Control Board regularly. In addition, there is a system owned by PCB installed at KMML premises. The readings are well within the stipulated standards.</i>
iv	Industrial wastewater shall be properly collected, treated so as to conform to the standards prescribed under GSR 422 (E) dated 19th May, 1993 and 31 st December, 1993 or as amended from time to time. The treated wastewater shall be utilized for plantation purpose.	<i>The treatment plant is commissioned in July 2014. The treated water is re- using for floor washing.  Currently, the industrial waste water (1.81M<sup>3</sup> / day) generated is treated to the prescribed standard at our treatment plant in TSP.</i>
v	The overall noise levels in and around the plant area shall be kept well within the standards (85dBA) 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 (daytime) and 70 dBA ( night time).	<i>The overall noise levels in and around the plant area is kept well within the standards. The sources of noise generation like Diesel Generators, Air Compressors are fully isolated by acoustic silencers /enclosures.</i>
vi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the factories Act.	<i>Occupational Health Surveillance of employees were conducted regularly and the records were maintained as per factories act</i>
vii	The company shall develop rain water harvesting structures to harvest the rain water for utilization in the lean season besides recharging the ground water table.	<i>Water conservation pond/ rain water harvesting facility with 9000 M3 capacity (Approx) has been made available for effective recharging of ground water table.</i>
viii	The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report. Further, the company must undertake socio-economic development activities in the surrounding villages like community development programmes , educational programmes , drinking water supply and health care etc.	<i>The environmental protection measures and safeguards recommended in the EIA/EMP report, socio-economic development activities in the surrounding villages like Community development programmes , educational programmes , drinking water supply and health care etc being fulfilled through KMML's CSR activities.</i>

ix	Requisite amount shall be earmarked towards the capital cost and recurring cost/annum for environmental protection measures and judiciously utilized to implement the conditions stipulated by the Ministry of Environment and Forests as well as the state government. The funds so provided shall not be diverted for any other purpose.	<i>Capital budget of ` 880 Lakhs were earmarked and approved for environmental protection measures stipulated by MoEF for the year 2014-15. The identified fund will not be diverted for any other purpose. Concurrence is awaited from VSSC regarding necessary funds.</i>
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x	A copy of clearance letter shall be sent by the proponent to concerned panchayat, Zila perished/ Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions / representations, if any, were received while processing the proposal. The clearance letter shall be put on the web site of the company by the proponent.	<i>The Environment Clearance Letter has been published as stipulated.</i>
xi	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional office of the MOEF, the respective Zonal office of CPCB and the KSPCB. The criteria pollutant levels namely SPM, RSPM, SO <sub>2</sub> , NO <sub>x</sub> (ambient levels as well as stack emissions ) or critical sectoral parameters , indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	<p><i>1) Three numbers of Ambient Air Monitoring Systems were installed at different identified locations around KMML and the data are being forwarded to State Pollution Control Board regularly. The readings are well within the stipulated standards.</i></p> <p><i>2) The stack monitoring by KSPCB approved external agency is done during June 2014.</i></p> <p><i>The following details are updated in web site of KMML</i></p> <ul style="list-style-type: none"> <li><i>A. Status of Specific conditions &amp; gen conditions</i></li> <li><i>B. and results of monitored data</i></li> <li><i>C. Form V</i></li> </ul> <p><i>Monitored data (Ambient and Stack) are displayed in public domain near the main gate.</i></p>
xii	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data ( both in hard copies as well as by e-mail) to the Regional office of MOEF at Bangalore , the respective Zonal office of CPCB and the SPCB. the Regional office of this Ministry at Bangalore /CPCB/(No Suggestions) shall monitor the stipulated conditions	
xiii	The environmental statement for each financial year ending 31 <sup>st</sup> March in Form-V as is mandated to be submitted by the project proponent to the concerned state pollution Control Board as prescribed under the Environment (protection rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental conditions and shall also be sent to the respective Regional offices of the MOEF by e-mail.	<i>Updated in the Web site</i>
xiv	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 KPCB and may also be seen at website of the Ministry of environment and forests at <a href="http://envforc.nic.in">http://envforc.nic.in</a> . this shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality in the region of which one shall be forwarded to the regional office at Bangalore.	<i>The Environment Clearance Letter has been published as stipulated and forwarded the same to regional office at Bangalore.</i>

xv	Project authorities shall inform the Regional office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work.	
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