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20/01/2015.

To

The Director,  
Ministry of Environment and Forests,  
Regional Office, South Zone  
E&F Blocks, 4th Floor, Kendriya Sadan,  
Kormangala,  
BANGALORE 560034

**Sub: Berger Paints India Limited, - Half Yearly Compliance Report.**

Please find our Half - Yearly report (Apr'14 to Sep'14) on compliance with conditions and environmental safeguards as laid down by you.

Trust this is in order.

We would be pleased to provide you with additional information if required.

Kindly acknowledge the receipt.

**With Regards,  
For Berger Paints India Ltd**

**Devashish Nath  
General Manager.**

**CC: To: 1. The joint chief EE, AP Pollution Control Board, Paryavaran Bhawan, A-3,  
Industrial Estate, Sanathnagar, Hyderabad 500018**

**2. The EE, AP Pollution Control Board, 1<sup>st</sup> Floor, Shankar Shopping Complex, Krishna  
Nagar Main Road, Kurnool, AP**

### Point-Wise Six Month Compliance Report Apr 2014 – Sep 2014

SI No	Conditions	Compliance Status(under construction stage)	Remarks
<b>A</b>	<b>SPECIFIC CONDITIONS:</b>		
i)	Only water Paint shall be manufactured. No solvent paint shall be manufactured without prior permission obtained from ministry.	Complied	
ii)	No lead and chromium based [paint shall be manufactured.	Complied	
iii)	Adequate stack height shall be provided to HSD/LDO fired steam boilers (5 Nos) to control air emissions. As proposed adequate dust extraction system shall be provided to capture fugitive emissions of fine particles from mixers during powder charging.	Will comply when installed	
iv)	The gaseous emissions (SO <sub>2</sub> , Nox, Co and HC) and particulate matter from boiler stack shall conform to the norms prescribed by the CPCB/AP pollution Control Board (APPCB) from time to time. At no time, the emission levels shall go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measure are rectified to achieve the desired efficiency. Stack emissions shall be monitored regularly.	Will comply.	
v)	The levels of PM <sub>2</sub> s, NOX Co HC (Methane and Non –methane) and VOCs shall be monitored in the ambient air and displayed at a convenient location near the main gate of the company and at important public places. The company shall upload the results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office MOEF, the respective Zonal office of CPCB and APPCB.	Work under progress	
vi)	In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals /materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and uploading	Adequate dust extraction system is installed in the Process system to control the fugitive emissions	



	areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emission shall conform to the limits stipulated by the APPCB.		
vii)	VOCs detectors shall be installed in the work zone. When monitoring results indicate above the permissible limits, effective measures shall be taken immediately.	It is not applicable for our case since we are not going to use any solvent. Even though we have procured portable VOC digital meter	
viii)	For further control of fugitive emissions, following steps shall be followed		
a	Closed handling system shall be provided for chemicals	Raw material (powder & liquids) are being charged through closed pipelines from storage area to process area	
b	Reflux condenser shall be provided over reactor.		
c	System of leak detection and repair of pump/pipeline based on preventive maintenance.		
d	The acid shall be taken from storage tanks to reactor through closed pipeline. Storage tanks shall be vented through trap receiver and condenser operated on chilled water.		
e	Cathodic protection shall be provided to the underground solvent storage tanks.		
ix)	The gaseous emission from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the Dg sets to mitigate the noise pollution.	Complied	
x)	Total fresh water requirement from APIC water supply shall not exceed 524 cum/day and prior permission shall be obtained from the concerned authority and a copy submitted to the ministry Regional office at Bangalore. No ground water shall be used.	Will not be used more than 525 cum/day.	
xi)	Total industrial waste water generation shall not exceed 84 cum/day. Industrial effluent shall be treated in ETP comprising physiochemical treatment facility, biological treatment and tertiary treatment. Treated effluent shall be recycled/reused within factory premises after achieving desired water quality for various purposes.	Complied	
xii)	No effluent shall be discharged outside the factory premises and Zero discharge concept shall be	Complied	

	adopted.		
xiii)	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arrestors shall be provided on tank farm. Solvent transfer shall be by pumps.	Solvent will not be used in process.	
xiv)	The company shall obtain Authorization for collection, storage and disposal of hazardous waste under hazardous Waste (management, Handling and Trans – Boundary Movement) rules, 2008 and amended as on date for management of Hazardous wastes and prior permission from APPCB shall be obtained for disposal of solid /hazardous wastes in the TSDF. Measures shall be taken from for firefighting facilities in case of emergency.	The solid waste will be disposed to M/s. Ramky, Hyderabad	
xv)	The company shall strictly comply with the rules and guidelines under manufacture, Storage and Import of hazardous chemicals (MSIHC) Rules 1989 as amended time to time. All Transportation of hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	Will be complied.	
xvi)	The company shall undertake following waste minimization measures :		
a	Metering and control of quantities of active ingredients to minimize waste.	All the powder and liquid ingredient will be taken from pneumatic conveying system with load cell and flow meter which automatically decreases the wastage.	
b	Reuse of by – products from the process as raw materials or as raw material substitute in other processes.	There is no by product in our process.	
c	Use of automated filling to minimize spillage.	Complied	
d	Use of close feed system into batch reactor.	Closed system for TSD's & mixers	
e	Venting equipment through vapour recovery system	Will be compiled.	
f	Use of high pressure hoses for equipment cleaning to reduce waste water generation.	Complied	
xvii)	Proper spillage management plan shall be prepared and implemented. A copy of spillage management plan shall be submitted to the	Complied	



	Ministry's regional office at Bangalore.		
xviii)	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the OISD 117 norms. Fire hydrant system shall be provided along with fire monitor and flame detection system in the process as well as storage areas.	Complied	
xix)	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Complied	
xx)	Green belt shall be developed in 80,617 sqm out of total land 1, 92, 831 sqm. Thick green belt with suitable plant species shall be developed around the unit to mitigate the odour problem.	Complied More than 16 Acres	
xxi)	Provision shall be made for the housing for the construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	Complied	
<b>B.</b>	<b>GENERAL CONDITIONS:</b>		
i	The project authorities shall strictly adhere to the stipulations made by the AP Pollution Control Board.	Shall be adhered.	
ii	No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of environment and Forests. In case of deviations or alterations 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 environment protection measures required if any.	Will comply in those circumstances	
iii	The locations of ambient air quality monitoring stations shall be decided in consultation with the State pollution Control Board and it shall be ensured that at least one stations is installed in the up wind and downwind direction as well as where maximum ground level concentrations are anticipated.	Complied	
iv	The overall noise levels in and around the plant	Complied.	

	area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under environment (protection) Act 1986 rules viz. 75 dBA (9day time) and 70 dBA (night time)		
v	The company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	Storm water in plant are directed towards rain water harvesting pits	
vi	Training shall be imparted to the employees on safety and health aspects of chemicals handling. Pre employment and routine periodical medical examinations for the all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Complied	
vii	Usage of Personnel protection equipments (PPEs) by all employees/ workers shall be ensured.	Complied	
viii	The company shall also comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.	Complied	
ix	The company shall undertake all relevant measures for improving the socio economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administrations.	Complied.	
x	The company shall undertake eco developmental measures including community welfare in the project area for the overall improvement of the environment.	Complied.	
xi	A separate environmental Management cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	Complied.	
xii	The company shall earmark sufficient funds to implement the conditions stipulated y the Ministry of Environment and Forests as well as state Government along with the implementation schedule for all the conditions stipulated herein.	Adhered.	

	The funds so earmarked for environment management/pollution control measures shall not be diverted for any other purposes.		
xiii	A copy of the clearance letter shall be sent by the project proponent to concerned panchayat, Zila parisad/Municipal corporation, union local body and the local NGO, if any from who suggestions representations, if any, were received while processing the proposal.	XXXXXXXXXXXXXXXXXX	