

PCL:EHS: EC :2023/ II/ 1061

Dated : 26.12.2023

Government of India

Ministry of Environment, Forest and Climate Chang

(IA-II Section)

Indira Paryavaran Bhawan Jorbagh Road, New Delhi – 3

Ref. No. : F.No. IA-J-11011/332/2018- IA II(I) –dtd. 07.01.2020

SUB: STATUTORY COMPLIANCE BASED ON ENVIRONMENTAL CLEARANCE FOR THE EXPANSION OF OUR CHLOR ALKALI PLANT & ESTABLISHMENT OF OTHER PLANTS BY M/S PRIMO CHEMICALS LTD (Formerly known as PUNJAB ALKALIES & CHEMICALS LIMITED) .

This refers to the conditions as indicated in the Environmental Clearance granted by Govt. of India (MoEF) Vide No. . IA-J-11011/332/2018- IA II(I) dated. 07.01.2020 to our, we are ,hereby, submitting the six monthly compliance report for the period 01.04.2023 to 30.09.2023 for further necessary action, please.

The six-monthly compliance report has been uploaded on the Parvesh Portal of MoEF&CC and on the website of our unit.

It is further mentioned here that till date we have implemented the partial production capacity of caustic soda i.e 500 TPD out of 800 TPD for which EC was obtained from MoEF&CC i.e we are manufacturing only 500 TPD of caustic soda and other allied products out of allowed capacity of 800 TPD.

The expansion on account of production capacity of our Caustic Soda has been expanded to 500 TPD against 800 TPD as allowed as per our EC referred above. After obtaining CTOs for other products i.e 35 MW Power plant, SBP & Aluminium Chloride Plant have been commissioned.

This is for your kind information, please.

Thanking you,

Yours faithfully,



(M P S WALIA)

GENERAL MANAGER (WORKS)

For PRIMO CHEMICALS LIMITED

(Formerly known as PUNJAB ALKALIES & CHEMICALS LIMITED)

CC : Government of India

Ministry of Environment, Forest and Climate Chang

Integrated Regional Office , Bays No. 24-25 , Dakshin Marg , Sector 31-A,

CHANDIGARH , PIN : 160030

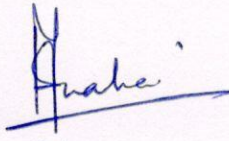
COMPLIANCE REPORT OF EC CONDITIONS FOR THE PERIOD 01.04.2023 TO 30.09.2023
PRODUCTION OF 500TPD OF CAUTIC SODA AND ALLIED PRODUCTS

EC compliance report

For Expansion of:

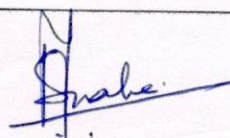
1. Chlor Alkali Plant from 99000 TPA to 264000 TPA.
2. Establishment of Flaker Plant.
3. Establishment of Stable Bleaching Powder Plant.
4. Establishment of Hydrogen peroxide Plant.
5. Establishment of Captive Power Plant.
6. Establishment of AlCl₃ Plant as per EC Ammendment

Sr. No.	EC Conditions /Recommendation	Compliance Status
A.	Specific Conditions:	
i	Solvent management shall be carried out as follows:	
a)	Reactor shall be connected to chilled brine condenser system.	Since we are not using any kind of Solvent, as such, there is no need to install chilled brine condenser system.
b)	Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	There is no reactor in which reaction is carried out and there is no use of any solvent for manufacturing of products for which EC has been obtained.
c)	The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.	No such condenser for recovery of any material has been installed in our unit.
d)	Solvents shall be stored in a separate space specified with all safety measures.	There is no use of any kind of solvent. How ever, only FO is used as fuel in the existing boilers, which is properly stored as per PESO guidelines for direct consumption in our existing Boilers.
e)	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	Proper earthing is provided as per PESO guidelines for storage of FO.
f)	Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	Entire plant wherever LDO/FO storage, H2-building and Cell House are flame proof. The storage tank of LDO/ FO is provided with breather valve.
g)	All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	There is no storage of solvents as there is no use of solvents for the products for which EC has been obtained.
ii	Industrial/trade effluent shall be segregated into High COD/TDS and Low COD/TDS effluent streams. High TDS/COD shall be passed through stripper followed by MEE and ATFD (agitated thin film drier). Low TDS effluent stream shall be treated in ETP/RO to meet the prescribed standards.	We have installed an ETP consisting of collection tank, neutralization tank, equalization tank, flash mixer, clarifier, MGF, ACF, DMF, RO feed tank, RO Plant, evaporator and 2 no. sludge drying beds.

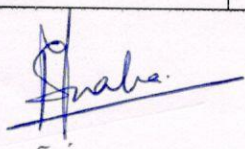


	RO permeate, evaporator condensate and steam condensate is collected in a tank for further using in the cooling tower as make up water.
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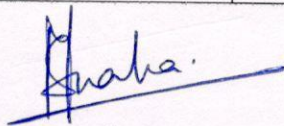
S. No.	EC Conditions/Recommendation	Compliance Status
I.	Statutory compliance	
	<p>(i) The project proponent shall obtain Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State Pollution Control Board/ Committee.</p>	<p>Reference to the EC Number: IA-J-11011/332/2018- IA II(I) – dated. 07.01.2020 and subsequently after obtaining CTE from Punjab Pollution Control Board (CTE Number: CTE/Exp/RPN/2021/16314815) we have started construction work for the following projects:</p> <p>1. Caustic Soda Expansion from 300 TPD to 500 TPD , Commissioning of 100 TPD Stable Bleaching Powder Plant , Commissioning of 35 MW Captive Power Plant and 50 TPD (step-wise) Aluminum Chloride Plant under progress and CTO obtained from PPCB having details:</p> <p>i.) CTO(water)/varied/PBIP/RPR/2023/ 210791735 dt. 31.03.2023 valid till 30.09.2023 and CTO(water)/varied/PBIP/RPR/2023/ 2309721444 dt. 29.11.2023 valid till 31.03.2025</p> <p>ii.) CTO(Air))/varied/ PBIP/RPR/2023/ 210791735 dt. 31.03.2023 valid till 30.09.2023 and CTO(Air))/varied/ PBIP/RPR/2023/ 2309247558 dtd.29.11.2023 valid till 31.03.2025</p> <p>2 CTE obtained from PPCB having details: CTE/Exp/RPN/2022/19354378 dt. 26.10.22 for 50 TPD Hydrogen Peroxide Plant.</p> <p>3 The work for the said projects :i.e Caustic Soda Expansion from 300 TPD to 500 TPD , 100 TPD Stable Bleaching Powder Plant , 35 MW Power plant & 50 TPD (step-wise) Aluminium Chloride Plant have been completed.</p>



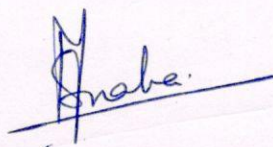
		<p>The total estimated investment for above projects shall be = RS. 300.78 Cr.</p> <p>While construction work of 50 TPD Hydrogen Peroxide Plant yet to start.</p>
	(ii) The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.	Authorization obtained under the HWM Rules, 2016, No. HWM/renew/RPN/2022/17840118 dtd. 17.04.2022 which is valid up to 31.03.2026.
	(iii) 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.	Complied : as the chemicals covered under the ambit of the Manufacture, Storage and Import of Hazardous Chemicals, 1989 are being handled as per the provisions of the said rules. Also the approval of Chief Inspectorate of Factories (Factory License) and Chief Controller of Explosives have been obtained.
II.	Air quality monitoring and preservation	
	(i) The project proponent shall install 24x7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB and CPCB online servers and calibrate these systems from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.	Complied with for the existing operational plant of 500 TPD Chlor-Alkali as the industry has installed OCEMS on the stack of HCl Plant and Sodium Hypo Plant for monitoring of HCl mist (vapours) and Chlorine gas parameters, and recently installed on the stacks of PP boiler and Flaker which are connected with the server of PPCB/CPCB. The unreacted Cl ₂ gas (if any) from upcoming SBP plant shall be neutralized at our existing sodium hypo plant /neutralizer .
	(ii) The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognized under Environment (Protection) Act, 1986.	Complied with as we have installed 32 no. of Cl ₂ sensors to monitor the leakages of chlorine gas in the plant area, which can detect chlorine to the level of 100.0 µg/Nm ³ . (0.10 mg/Nm ³).
	(iii) The project proponent shall install system to carryout Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released (e.g. PM ₁₀ and PM _{2.5} in reference to PM emission, and SO ₂ and NO _x in reference to SO ₂ and NO _x emissions) within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120° each), covering upwind and downwind directions.	<p>We have installed three HVS at different locations inside the industrial premises to monitor the ambient air quality, which are being operated on regular basis to monitor PM, Chlorine and HCl-Vapours in ambient air.</p> <p>In addition PPCB has installed RDS to monitor PM, SO₂, chlorine and NO_x in ambient air in the premises of our unit. This data is being uploaded by the PPCB on its website.</p>



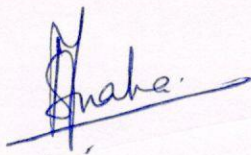
<p>(iv) To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.</p>	<p>There are only fugitive emissions of chlorine from different sections, which are collected by providing hoods attached to a common duct which eventually leads to chlorine neutralizer.</p> <p>The pre commissioning activity of the Power Plant is on and we ensure the compliance with regard to sulphur contents in the coal as fuel.</p>
<p>(v) Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions</p>	<p>Common Salt is the raw material, which is stored in a shed.</p> <p>There is no use of coal as a fuel for the present production. However, coal will be used as fuel in the co-generation power plant, which will be stored in a shed to rule out the possibility of generation of any kind of fugitive emissions.</p>
<p>(vi) National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.</p>	<p>Our is a Caustic-Chlor plant for which industry specific effluent/emission standards have been laid down by the MoEF&CC, which are being complied with in letter and spirit.</p>
<p>(vii) The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be complied with.</p>	<p>Compliance of the National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 is being ensured in letter and spirit.</p>
<p>III. Water quality monitoring and preservation</p>	
<p>(i) The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.</p>	<p>The industry has installed Online continuous Emission monitoring system (OCEMS) at the pipeline through which Treated Wastewater is being Re-used back into the processes and data of the same is being transmitted to the portal of CPCB and PPCB.</p>
<p>(ii) As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises.</p>	<p>Complied. We are a ZLD plant and are maintaining our ZLD status and no waste/treated water is being discharged outside the premises.</p>
<p>(iii) Total fresh water requirement shall not exceed 11936 cum/day, proposed to be met from Irrigation Department, Government of Punjab. Prior permission in this regard shall be obtained from the concerned regulatory authority.</p>	<p>Only surface water from river Sutlej is taken to meet the water supply demand and permission in this regard has been obtained from Department of Water Resources. A copy of the said permission is attached herewith.</p>
<p>(iv) Process effluent/any wastewater shall not be allowed to mix with storm water .The storm water</p>	<p>In order to collect the storm water, a garland drain has been constructed. The process effluent/ wastewater is</p>



	from the premises shall be collected and discharged through a separate conveyance system.	conveyed to collection tank through pipeline, to rule out the possibility of mixing of process water/wastewater from surface run-off.
	(v) The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.	Agreed. Site has been identified & approval process is underway for its implementation
	(vi) The DG sets shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.	All the DG sets are equipped with proper canopies and stacks of adequate heights. The stack monitoring of DG Sets is not required as running hours are negligible. While stack monitoring/testing of DG sets from NABL Lab (3 rd party) has been done and report of the same is enclosed.
IV.	Noise monitoring and prevention	
	(i) Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Proper acoustic enclosures have been provided to DG set for controlling the sound pressure level.
	(ii) The overall noise levels in and around the plant 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 overall noise levels in and around the plant area is well within the standards by providing noise control measures including acoustics. Report of the same is enclosed.
	(iii) The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.	Noise levels at the prominent places of the unit are being monitored at regular basis and are found within the prescribed standards.
V.	Energy Conservation measures	
	(i) The energy sources for lighting purposes shall preferably be LED based.	Complied with as LED based lighting system has been provided. Use of hydrogen as fuel in boilers instead of petroleum fuels <ul style="list-style-type: none"> • Installation of variable frequency drive (VFD) in cooling water pump • Installation of variable frequency drive (VFD) in Air compressors • Replacement of conventional light with LED light in plant area and offices • Replacement of V belts with composite V belt with vacuum pump • IE3/IE4 Motors Installation in place of existing IE1/IE2



		<ul style="list-style-type: none"> • Installation of Energy efficient agitators for process mixing • In place of vehicles to transport raw material we will install pipelines to pump raw materials for proposed project • Process optimization and use of latest technology for specific power consumption reduction
VI.	Waste management	
	(i) Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame Arrester shall be provided on tank farm and the solvent transfer through pumps.	Hazardous chemicals are being stored in the specified tanks, which are provided with necessary flame arrester system.
	(ii) Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.	<p>The brine sludge is stored in the earmarked area. Possibility is being explored to manufacture bricks as per SOP framed by the CPCB.</p> <p>The ETP sludge is given to the operator of the common TSDF and Used oil is given to the registered recycler.</p>
	<p>(iii) The company shall undertake waste minimization measures as below:-</p> <p>(a) Metering and control of quantities of active ingredients to minimize waste.</p> <p>(b) Reuse of by-products from the process as raw materials or as raw material Substitutes in other processes.</p> <p>(c) Use of automated filling to minimize spillage.</p> <p>(d) Use of Close Feed system into batch reactors.</p> <p>(e) Venting equipment through vapour recovery system.</p> <p>(f) Use of high pressure hoses for equipment clearing to reduce waste water generation.</p>	Efforts are being made on regular basis to minimise the waste generation by recycling and reuse etc.
VII	Green Belt	
	(i). The green belt of 5-10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.	<p>Complied with:</p> <p>At present, green belt will be provided in 33 % of the total plant/project Area of 3,26,174 m².</p> <p>As on date over 32000 trees have been planted.</p>



VII I	Safety, Public hearing and Human health issues	
	(i) Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.	Hazard Identification and Risk Assessment (HIRA) and Disaster Management Plan are already in place. We have already submitted copies of the on-site emergency plan, off-site emergency plan and Disaster Management Plan to the Regional Office of MoEF&CC at Chandigarh.
	(ii) 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 norms.	Adequate Fire fighting system is available along with fire hydrants, extinguishers etc., duly approved by Third party.
	(iii) The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.	Complied with. All the PPE have been issued to individual employee as per Factory Act,1948 and all the workers are only allowed in the working area with Personal Protection Equipment (PPE) as per the norms of Factory Act.
	(iv) Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Time to time training is being imparted to the workers regarding safety and health aspects. Their pre-employment medical check-up and routine medical check-up is mandatory. Accordingly medical check-up of all employees is carried out once in a year and those working in hazardous areas are covered twice in a year.
	(v) Provision shall be made for the housing of 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, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.	Complied with as all the requisite facilities for the labour deployed in construction activities, are provided.
	(vi) Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Complied with as Occupational health surveillance of the workers is being done on a regular basis and records in this regard is being maintained as per the Factories Act ,1948.
	(vii) There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.	Complied with as there is adequate parking space is available in the premises of the unit.
IX.	Corporate Environment Responsibility	
	(i) As proposed, Rs.8 Crore shall be allocated for Corporate Environment Responsibility (CER). The CER plan shall be implemented during the plant construction stage and before commissioning of the project.	Out of Rs.1240 Crore originally planned, presently undertaken projects worth Rs.300.78 Crore. As per balance sheet and audited report the total amount spent on the projects under construction is Rs.300.78 Cr till 30.09.2023 for which CER spending comes out to be Rs.1.941 Crore on pro-rata basis (i.e. Rs.8.00 Crore has to be spent on CER for project worth Rs.1240 Crore) against which Rs.1.95 Crore has been spent on CER activities.
	(ii) The company shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should	Complied as the company has prepared environmental policy, which has been duly approved by the Board of Directors. This policy contains SOPs for proper checks and

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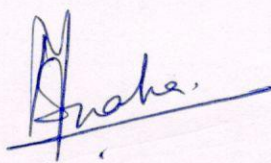
<p>prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/forest/wildlife norms/conditions. The company shall have defined system of reporting infringements/deviation/violation Norms/conditions and/or shareholders/stake holders. The copy of the board resolution in this regard shall be submitted to the MOEF & CC as a part of six-monthly report.</p>	<p>balances and to bring into focus the environmental concerns.</p> <p>Environment policy duly signed by competent authority is attached.</p>
<p>(iii) A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly to the head of the organization.</p>	<p>Environmental Management Cell has been set up both at HO and site under the control of Sr. Executives of the company.</p> <p>A) AT HO :</p> <ol style="list-style-type: none"> 1. Sr. Vice President 2. Chief Financial Officer <p>B) AT SITE</p> <ol style="list-style-type: none"> 1. GM (Works) 2. DGM (Works) 3. DGM (Projects) 4. DM (Env.&Pollution Control)
<p>(iv) Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.</p>	<p>Agreed & following has been completed in current year</p> <p>Soil:</p> <ol style="list-style-type: none"> i) Lifting of MEE Sludge ii) Plantation <p>Air:</p> <ol style="list-style-type: none"> iii) Installation of APCD as ESP , bag filters at crushers & Silo in PP iv) Covering of coal conveyer belts in PP v) Installation coal shed & showers in PP vi) Installation of APCD as cyclone & bag filters at in Flaker boiler vii) Covering of husk conveyer belts in flaker plant viii) Installation of 10 feet sheets around flaker husk storage. ix) Installation alkali scrubber as APCD in AICI3 plant. x) Cost of running OCEMS xi) Quarterly 3rd party stack analysis.

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		<p>Water:</p> <p>xii) Running of RO plant which include cost of electricity, cost of steam , cost of chemicals , man power cost & maintenance cost.</p> <p>xiii) Pumping of septic tank water to plantation</p> <p>xiv) Rainwater harvesting</p> <p>xv) Lifting of used oils.</p> <p>xvi) Quarterly 3rd party analysis of piezometers, ETP O/L, drinking water, & ground waters.</p> <p>xvii) Cost of running OCEMS</p> <p>xviii) Environment consultancy fees on monthly basis</p> <p>xix) Environment audit and Environment statement.</p>
	(v) Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.	Compliance of this is ensured. Regular environmental audit from third party is being got done.
X.	Miscellaneous	
	(i) The project proponent shall make public the environmental clearance granted for their project along with the environmental conditions and safeguards at their cost by prominently advertising it at least in two local newspapers of the District or State, of which one shall be in the vernacular language within seven days and in addition this shall also be displayed in the project proponent's website permanently.	Complied with: An advertisement was published in two newspapers on 12.01.2020 regarding the EC granted by the MoEF&CC was published.
	(ii) The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayat and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt	Complied with
	(iii) The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and update the same on half-yearly basis.	Complied: with: Half yearly compliance report of EC conditions is being prepared and submitted to the MoEF&CC/PPCB on regular basis.
	(iv) The project proponent shall monitor the criteria pollutants level namely; PM-10, SO2, NOx (ambient levels as well as stack emissions) or critical sectoral	We have installed three HVS at different locations inside the industrial premises to monitor the ambient air

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<p>parameters, indicated for the projects and display the same at a convenient location for disclosure to the public and put on the website of the company.</p>	<p>quality, which are being operated on regular basis to monitor PM , chlorine and HCl-mist in ambient air if any.</p> <p>In addition PPCB has installed RDS to monitor PM , SO₂ ,chlorine and NO_x in ambient air in the premises of our unit. This data is being uploaded by the PPCB on its website.</p> <p>The data for disclosure to the public has been displayed at a convenient location at the Factory Main Gate .</p>
<p>(v) The project proponent shall submit six-monthly reports on the status of the compliance of the stipulated environmental conditions on the website of the ministry of Environment, Forest and Climate Change at environment clearance portal.</p>	<p>Complied as Half yearly compliance report of EC conditions is being prepared and submitted to the MoEF&CC/PPCB and same was uploaded on the company's website and also submitted on MoEF Portal (parivesh).</p>
<p>(vi) The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.</p>	<p>Complied as Environmental statement in Form-V is being prepared every year and submitted to the PPCB and same was uploaded on the company's website.</p>
<p>(vii) The project proponent 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, commencing the land development work and start of production operation by the project.</p>	<p>Being Complied as the project is still under execution / construction stage. Project financial closure and its approval by concerned authorities will be informed on actual basis after the completion of the project.</p>
<p>(viii) The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.</p>	<p>All PPCB Directions complied.</p>
<p>(ix) The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.</p>	<p>Complied as we are agreeing to comply.</p>
<p>(x) No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change.</p>	<p>Complied as we are agreeing to comply.</p>
<p>(xi) The Regional Office of this Ministry shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data / information/monitoring reports.</p>	<p>Complied</p> <p>Proper cooperation was provided and will be during the visits.</p>





ਜਲ ਸਰੋਤ ਵਿਭਾਗ, ਪੰਜਾਬ

Office of Executive Engineer/ Ropar Canal & Ground Water Division WRD, Punjab, Ropar
ਦਫਤਰ ਕਾਰਜਕਾਰੀ ਇੰਜੀਨੀਅਰ/ਰੋਪੜ ਨਹਿਰ ਅਤੇ ਗਰਾਊਂਡ ਵਾਟਰ ਮੰਡਲ ਜਲ ਸਰੋਤ ਵਿਭਾਗ, ਪੰਜਾਬ, ਰੋਪੜ
ਫੋਨ ਨੰਬਰ 01881-222210 ਈ-ਮੇਲ ਆਈ. ਡੀ.- xen.roparcanal@gmail.com

No. 4057-58/50-R

Dated. 05.06./2023

To,

The General Manager (Works) ✓
PRIMO Chemical Limited,
Naya Nangal


Sub:- Copy of Agreement for the year 2023-2024(10-05-2023 To
11-05-2024

Ref:- Your Office Letter No. PCL:EHS:2023/2.25/330 Dated 01-05-
2023

Photo copy of the Agreement duly signed for the above cited
period is sent herewith for record in your Office.

This is for your information.

DA/As above


Executive Engineer,
Ropar Canal & Ground Water Division,
WRD, Punjab, Ropar

Copy :-
Sub Divisional Officer, Head Works Sub Division Rupnagar for
information & further necessary action please.

DA/As above



PUNJAB POLLUTION CONTROL BOARD
AIR LABORATORY, HEAD OFFICE, VATAVARAN BHAWAN, PATIALA
Telefax: 0175-2302392 Email : ppcbairlab@gmail.com

26/5

1. Laboratory Sample No. 56-61/H.O.Lab./Air/Monitoring/2023-24
2. Name of Industry M/s Punjab Alkalies & Chemicals Ltd, Naya Nangal, Distt. Rupnagar
3. Name of Sample Collecting Officer Er. Vijay Kumar EE, Er. Harsimran Singh, AEE & Dr. Gurpreet Singh, ASO
4. Designation of authorizing Test Environmental Engineer, RO- Roopnagar
5. Type of Sample Stack Emission
6. Date & Time of Sample collection 12.05.2023
7. Date & Time of Sample receipt in Lab. 15.05.2023
8. Point of Sample collection Details as given below

RESULTS

S.N o.	Point of Sample Collection	Parameter	Results	Prescribed Standard	
				A Area upto 5 km from the periphery of class I and class II town	B Other than "A"
1.	From port hole on stack after APCD (Sterling Boiler- 10 TPH)	Particulate Matter (mg/Nm ³)	31	350	500
2.	From port hole on stack after APCD (Thermax Boiler- 5 TPH)	Particulate Matter (mg/Nm ³)	12	350	500
3.	From port hole on stack after APCD (Hypo Plant-II)	Chlorine (mg/m ³)	9.2	15	
4.	From port hole on stack after APCD (Hypo Plant-I)	Chlorine (mg/m ³)	5.8	15	
5.	From port hole on stack after APCD (HCl Furnace I of Unit-II)	Acid Mist as HCl (mg/m ³)	22	35	
6.	From port hole on stack after APCD (HCl Furnace II of Unit-II)	Acid Mist as HCl (mg/m ³)	14	35	

Note:- If any, other limits/specific standard has been prescribed time to time by MoEF&CC, CPCB and PPCB then those limits/specific standard would prevail subject to clarification from the concerned Regional Office.

Kaushal
17/5/23
Analysed by

J. J. 17.05.23
Scientific Officer
(Air Lab)

Endst. No: 11532-34

Dt. 17/5/23

A copy of the above is forwarded to the following for information and necessary action:

1. The Chief Environmental Engineer (Air), Punjab Pollution Control Board, Jalandhar
2. The Senior Environmental Engineer, Punjab Pollution Control Board, ZO-I, Patiala
3. The Environmental Engineer, Punjab Pollution Control Board, Regional Office, Roopnagar

Kaushal
17/5/23
Asstt. Scientific Officer

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1)

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Laboratory

69

TEST CERTIFICATE

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Page 1 of 1

To
 M/s PRIMO CHEMICALS LIMITED
 NANGAL-UNA ROAD,NAYA NANGAL, DISTT. ROPAR(PUNJAB)

Report No	ST-040923-04	Report Date	09.09.2023
Your Ref. No/Work Order and date	---	Type of Sample	Stack Emission (D.G.SET)-01
Sample Code Given by Customer	OLD	Date of Sampling	02.09.2023
		Date of Sample Receipt	04.09.2023
Sampling Location	Within Premises	Sample I.D.	NTL/LAB-04
Sample Collected By	Lab Person	Date of Test	04.09.2023 - 09.09.2023
Sampling procedure	As per SOP		

TECHNICAL DATA

Instrument Used for Sampling	Stack Monitoring Instrument(VSSI)		
Source of Emission	D.G.Set (500 KVA) 1 No. Stack Attached to D.G.Set		
Engine S. No	25124388	Model Name	cummins
Mfg Year	21/04/1981	Fuel Used	H.S.D
		Type & Qty. of fuel used (lt/hr)	70 Liter/hr
Velocity of Flue Gases	11.74m/s	Type of Stack	Round of M.S
Ambient Air Temp	30°C	Sampling Time	40Min
Stack Height	30 feet	Stack Temperature	152°C
Diameter of Stack	6 inch		
Stack material Metal/RCC/Brick	Metal		
Identification single/multiple	Multiple		
Sampling port hole/platform	Sampling done by standing on Platform		

SR. NO	PARAMETERS	RESULTS	Limits (As per CPCB2010)	TEST METHOD
1	Particulate Matter, mg/Nm ³	51.9 mg/Nm ³	75	IS:11255(Pt -1): 1985
2	Carbon Monoxide, (as CO) mg/Nm ³	54 mg/Nm ³	150	IS 13270 : 1992
3	Oxides of Nitrogen, (as NO _x) mg/Nm ³	40 mg/Nm ³	710	NTL/CHEM/SOP-018, Issue No. 1: 2017
4	Sulphur Content, (as SO ₂)	ND	<2%	IS 11255 Part 2: 2006

1. The test report refers only to tested sample and applicable parameters.
2. This report can neither be used as evidence in the court of law nor can it be used in part or full in any media without prior permission.
3. The sample will be destroyed after Thirty days from the date of issue of test report unless otherwise specified.



End of Report

Branch Office-111A, Sunder Enclave,First Floor, Near maa Shimla Homes,Opposite radha swami Satsung Bhawan, Kharar, Mohali,Punjab-140301

Laboratory : GT-20, Sector-117, NOIDA, Gautam Budh Nagar - 201301

Branch Office :

HARIDWAR | RUDRAPUR | CHANDIGARH | DEHRADUN | PUNE

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For an Assured Future

M/s PRIMO CHEMICALS LIMITED
 NANGAL-UNA ROAD, NAYA NANGAL, DISTT. ROHAR (PUNJAB)

TEST CERTIFICATE

Accountant

Report No	ST-040923-05	Report Date	09.09.2023
Your Ref. No/Work Order and date:	...	Type of Sample	Stack Emission (D.G.SET)-02
Sample Code Given by Customer	NEW	Date of Sampling	02.09.2023
Sampling Location	Within Premises	Date of Sample Receipt	04.09.2023
Sample Collected By	Lab Person	Sample I.D.	NTL/LAB-05
Sampling procedure	As per SOP	Date of Test	04.09.2023 - 09.09.2023

TECHNICAL DATA

Instrument Used for Sampling	Stack Monitoring Instrument(VSSI)		
Source of Emission	D.G.Set (500 KVA) 1 No. Stack Attached to D.G.Set	Model Name.	Cummins
Engine S. No	25232699	Fuel Used	H.S.D
Mfg.Year	27.12.1997	Type & Qty. of fuel used (lt/hr.)	70 Liter/hr
Velocity of Flue Gases	12.20m/s	Type of Stack	Round of M.S
Ambient Air Temp	31 °C	Sampling Time	46Min
Stack Height	30 feet	Stack Temperature	185°C
Diameter of Stack	6 inch		
Stack material Metal/RCC/Brick	Metal		
Identification single/multiple	Multiple		
Sampling port hole/platform	Sampling done by standing on Platform		

SR. NO	PARAMETERS	RESULTS	Limits (As per CPCB2010)	TEST METHOD
1	Particulate Matter, mg/Nm ³	51.2 mg/Nm ³	75	IS:11255(Pt-1): 1985
2	Carbon Monoxide, (as CO) mg/Nm ³	51mg/Nm ³	150	IS 13270 : 1992
3	Oxides of Nitrogen, (as NO _x) mg/Nm ³	49 mg/Nm ³	710	NTL/CHEM/SOP-018, Issue No. 1: 2017
4	Suphur Content. (as SO ₂)	ND	<2%	IS 11255 Part 2: 2006

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(Authorized Signatory)

End of Report

Branch Office-111A, Sunder Enclave, First Floor, Near maa Shimla Homes, Opposite radha swami Satsung Bhawan, Kharar, Mohali, Punjab-140301

Laboratory : GT-20, Sector-117, NOIDA, Gautam Budh Nagar - 201301

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NANGAL DINA ROAD, NAYA NANGAL, DISTT. ROHAR (PUNJAB)

TEST CERTIFICATE			
Report No.	SI-040923-04	Type of Sample	Stack Emission (D.G.SET)-03
Visit Ref. No./Work Order and Date		Date of Sampling	02.09.2023
Sample Code Given by Customer	Nil	Date of Sample Receipt	04.09.2023
Sampling Location	Within Premises	Sample ID	NTL/LAB-06
Sample Collected By	Lab Person	Date of Test	04.09.2023 - 09.09.2023
Sampling procedure	As per SOP		

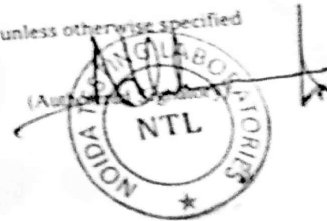
TECHNICAL DATA

Instrument Used for Sampling	Stack Monitoring Instrument(VSSI)		
Source of Emission	D.G.Set (500 KVA) 1 No. Stack Attached to D.G.Set		
Engine S. No	25318279	Model Name	cummins
Mfg Year	12/2006	Fuel Used	H.S.D
		Type & Qty. of fuel used (lt/hr.)	70 Liter/hr
Velocity of Flue Gases	12.48m/s	Type of Stack	Round of M.S
Ambient Air Temp	30 °C	Sampling Time	38Min
Stack Height	40 feet	Stack Temperature	169°C
Diameter of Stack	8 inch		
Stack material Metal/RCC/Brick	Metal		
Identification single/multiple	Single		
Sampling port hole/platform	Sampling done by standing on Platform		

SR NO	PARAMETERS	RESULTS	Limits (As per CPCB2010)	TEST METHOD
1	Particulate Matter, mg/Nm ³	52.7 mg/Nm ³	75	IS 11255(Pt -1): 1985
2	Carbon Monoxide, (as CO) mg/Nm ³	59.2 mg/Nm ³	150	IS 13270 : 1992
3	Oxides of Nitrogen, (as NO _x) mg/Nm ³	49.6 mg/Nm ³	710	NTL/CHEM/SOP-018, Issue No. 1, 2017
4	Sulphur Content, (as SO ₂)	ND	<2%	IS 11255 Part 2, 2006

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End of Report



Branch Office-111A, Sunder Enclave, First Floor, Near maa Shimla Homes, Opposite radha swami Satsung Bhawan, Kharar, Mohali, Punjab-140301

Laboratory : GT-20, Sector-117, NOIDA, Gautam Budh Nagar - 201301

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TEST CERTIFICATE

Page 1 of 1

To M/S PRIMO CHEMICALS LIMITED NANGAL-UNA ROAD,NAYA NANGAL, DISTT. ROPAR(PUNJAB)		Report Date	09.09.2023
Report No.	ST-040923-07	Type of Sample	Stack Emission (D.G.SET)-04
Your Ref. No/Work Order and date		Date of Sampling	02.09.2023
Sample Code Given by Customer	Nil	Date of Sample Receipt	04.09.2023
Sampling Location	Within Premises	Sample I.D	NTL/LAB-07
Sample Collected By	Lab Person	Date of Test	04.09.2023 - 09.09.2023
Sampling procedure	As per SOP		

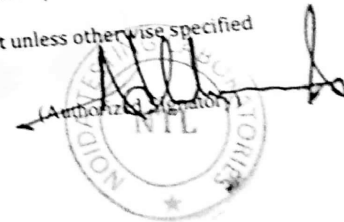
TECHNICAL DATA

Instrument Used for Sampling	Stack Monitoring Instrument(VSSI)		
Source of Emission	D.G.Set (500 KVA) 1 No. Stack Attached to D.G.Set	Model Name.	cummins
Engine S. No	25318012	Fuel Used	H.S.D
Mfg Year	12/2006	Type & Qty. of fuel used (lt./hr.)	70 Liter/hr
Velocity of Flue Gases	11.85m/s	Type of Stack	Round of M.S
Ambient Air Temp	30°C	Sampling Time	40Min
Stack Height	40 feet	Stack Temperature	162°C
Diameter of Stack	8 inch		
Stack material Metal/RCC/Brick	Metal		
Identification single/multiple	Single		
Sampling port hole/platform	Sampling done by standing on Platform		

SR NO	PARAMETERS	RESULTS	Limits (As per CPCB2010)	TEST METHOD
1	Particulate Matter, mg/Nm ³	51.2 mg/Nm ³	75	IS:11255(Pt-1): 1985
2	Carbon Monoxide, (as CO) mg/Nm ³	58.6 mg/Nm ³	150	IS 13270 : 1992
3	Oxides of Nitrogen, (as NO _x) mg/Nm ³	51.6 mg/Nm ³	710	NTL/CHEM/SOP-018, Issue No. 1: 2017
4	Sulphur Content, (as SO _x)	ND	<2%	IS 11255 Part 2: 2006

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End of Report



Branch Office-111A, Sunder Enclave, First Floor, Near maa Shimla Homes, Opposite radha swami Satsung Bhawan, Kharar, Mohali, Punjab-140301

Laboratory : GT-20, Sector-117, NOIDA, Gautam Budh Nagar - 201301

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SOUND LEVEL MONITORING.

S.No.	Locations	10/2/23	17/3/23	20/4/23	16/5/23	15/6/23	14/7/23	16/8/23	14/9/23	20/10/23
1.	Lignite Area II	72.4	73.00	71.00	68.02	70.00	67.10	68.00	67.17	65.00
2.	QC Lab	63.0	60.00	62.00	60.00	58.00	59.20	60.70	60.00	55.00
3.	HCL Plant U-II			68.13	70.00		73.00	72.07	69.20	70.17
4.	Cl ₂ Comp. U-II	70.1	71.03	70.05	69.03	72.13	71.10	72.00	73.00	71.19
5.	Elect. Workshop U-II	72.	70.00	72.00	70.00	71.07	69.20	70.27	67.50	66.10
6.	Cell House U-II	73.0	68.00	69.00	67.13	66.77	64.11	67.40	67.00	64.15
7.	Brine plant U-II	70.0	65.00	68.00	70.00	71.45	74.13	73.00	71.33	70.00
8.	Hypo Sec. U-II	72.0	68.00	70.00	65.11	70.11	72.00	71.20	69.71	67.17
9.	Cl ₂ Filling Area II	75.0	71.00	72.00	73.00	75.35	78.45	76.15	71.00	73.13
10.	Boiler Area U-II	68.0	70.00	69.00	70.00	70.88	70.00	69.10	70.00	70.18
11.	SBP Plant U-II						67.10	68.22	63.10	
12.	Sub. Station U-II	66.0	69.00	70.00	72.00	71.50	70.90	71.55	70.15	69.17
13.	Utility sec U-II	70.0	74.00	72.00	70.00	75.42	79.80	80.12	84.03	85.00
14.	Sub. Station I	68.0	62.00	65.00	69.01	70.00	71.11	69.10	67.10	68.00
15.	Cell House I	65.0	69.00	70.00	68.00	71.11	73.10	72.00		
16.	Brine plant I	70.0	75.00	73.00	70.00	69.55	76.80	77.17		
17.	Boiler Area U-I	68.0	68.05	70.00	70.00	72.59	71.00	69.55	73.10	
18.	Utility Section U-I	68.0	70.00	71.00	73.13	75.61	76.00	78.22	76.13	74.10
19.	Mech. Wash. U-I	68.1	70.00	68.00	71.00	70.50	72.10	70.90	71.00	69.03
20.	Hypo Section U-I	69.0	75.00	68.10	70.00	71.11	73.90	74.15		
21.	Grate 1	65.7	62.00	60.00	62.00	60.40	62.00	63.13	60.00	61.00
22.	Grate 2	61.2	58.00	60.00	63.00	60.10	60.00	59.51	59.10	60.00
23.	Binewal Vill. Boundary	60.0	55.00	60.00	61.00	59.13	59.00	60.00	60.00	60.00
24.	Railway Siding	62.0	59.00	62.00	60.00	61.89	60.00	61.15	63.16	62.00
25.	Elect. Wash (U-I)	63.0	64.00	61.00	62.00	65.27	66.10	69.50	67.10	68.00