

**Rashtriya Chemicals and
Fertilizers Limited**
(Government of India Undertaking)



साथ बढें समृद्धि की ओर

**राष्ट्रीय केमिकल्स एण्ड फर्टिलाइजर्स
लिमिटेड**
(भारत सरकार का उपक्रम)

पंजीकृत कार्यालय : "प्रियदर्शनी", ईस्टर्न एक्सप्रेस हाइवे, मुंबई - 400 022.

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वेबसाईट / Website : www.rcf Ltd.com • CIN No. : L24110MH1978GOI020185

RCF/Tr/ENV/Nano Urea /2024-25

17.10. 2024

To,
Additional Principal Chief Conservator of Forests
Ministry of Environment, Forests & Climate Change
Regional Office (West Central Zone)
Ground Floor, East Wing,
"New Secretary Building" Civil lines,
Nagpur-440 001

Sub.: Submission of compliance report of "Installation of New Nano-Urea Fertilizer Plant" of total capacity 27,375 KL/annum at Trombay unit, Mumbai (Maharashtra)-

Ref.: MOEF&CC memorandum File No. Proposal No. IA/MH/IND3/426519/2023; File No. IA-J-11011/216/2021-IA-II(I)] dated 29.05.2023

Dear Sir,

With reference to your above mentioned letter we are sending compliance report of "Installation of New Nano Urea Fertilizer Plant" of total capacity 27,375 KL/Annum at R.C.F. Trombay Unit, Chembur, for the period of April 2024 to September 2024 for your kind perusal.

Thanking you,

Yours Sincerely,

Vikram Jawale

Executive Director (Trombay)

le NBK

Compliance report on proposed project of "Installation of New Nano-Urea Fertilizer Plant" of total capacity 27,375 KL/annum located at RCF Trombay Unit. [MOEF&CC memorandum File No. Proposal No. IA/MH/IND3/426519/2023; File No. IA-J-11011/216/2021-IA-II(I)] dated 29.05.2023

A. Compliance of the terms and Conditions mentioned in point 22:

S. N.	Conditions	Compliance Status
i)	<p>The PP shall develop Greenbelt over an area of atleast, 57.93Ha (34.43 Ha in Trombay unit & 23.5 Ha in RCF Trombay Township) by planting 33306 within a period of one year of grant of EC. The saplings selected for the plantation should be of sufficient height, preferably 6-ft (about 2 m). The budget earmarked for the plantation shall be kept in separate account and should be audited annually. PP should annually submit the audited statement along with proof of activities viz. photographs (before & after with geo-location date & time), details of the expert agency engaged, details of species planted, number of species planted, survival rate, density of plantation etc. to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.</p>	<p>1) From Apr'23 to Sep'24, in house tree plantation done in Factory & admin and township area: 10249 Nos. Types of trees - Karanj, Kanchan, Satvin, Neem, Rain tree, Ficus, Palm tree, Bahava, Bakul, Teubia, Badam, Chinch, Jamun, Vad, Kadamba, Ashoka, Sitafal, Avala, Taman, Guava, Kailaspati, Sapota etc.</p> <p>2) Mass tree plantation contract line up in process by contract cell for 12500 Nos. of tree plantation at Factory, Admin and Township area.</p> <p>3) The remaining tree quantity of 10557 are proposed to be planted during coming monsoon.</p>
ii)	<p>A separate Environmental Management Cell (having qualified persons with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions. PP shall engage executive director- dy. general manager (HSE)- Assistant general manager chem (Env)- chief manager (chem) Env- Engineer chem (Env). In addition to this one safety & health officer as per the qualification given in Factories Act</p>	<p>The RCF Trombay unit has Separate Environmental Management Cell comprising Chief Manager (Chem), Sr. Engineer (Chem) and Environmental Engineer headed by Deputy General Manager.</p> <p>RCF Trombay unit is equipped with full-fledged Central Chemical Laboratory (NABL Certified) to carry out the Environmental Management and Monitoring functions.</p> <p>RCFL also have a fully functional Safety dept. compiling all required statutory needs in accordance to Factories Act</p>

	<p>1948 shall be engaged within a month of grant of EC. PP should annually submit the audited statement of amount spent towards the engagement of qualified persons in EMC along with details of person engaged to the Regional Office of MoEF &CC before 1st July of every year for the activities carried out during previous year.</p>	<p>1948. The safety department consists of DGM(HSE), AGM(F&S), Five number of Safety officers and one electrical safety officer.</p>
iii)	<p>The company shall 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, and risk mitigation measures relating to the project shall be implemented. The budget propose under EMP is ₹ 129 Lakh (Capital cost) and ₹ 54.12 Lakhs /annum (Recurring cost) shall be kept in separate account and should be audited annually.</p> <p>The PP should submit the annual audited statement along with proof of implementation of activities proposed under EMP duly supported by photographs (before & after with geo-location date & time) and other document as applicable to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.</p>	<p>Compliance assured.</p>
iv)	<p>The total water requirement for the proposed project shall be 90 KLD Out of 90 KLD. 5 KLD freshwater shall be provided by BMC for drinking purposes. The PP should ensure that water supply should not be above the permissible limit as mentioned in the letter and fresh water shall be withdrawn only after obtaining valid agreement from Concerned Authority. The PP should submit the details of utilization to the Integrated Regional Office (IRO), MoEF&CC before 1st July of every year for the activities carried out during the previous year.</p>	<p>Will be complied.</p>

v)	The wastewater generation shall not exceed 9.25 KLD (sewage: 4 KLD, Industrial Effluent 5.25 KLD), Sewage shall be treated in STP & reused for horticultural purposes while Industrial effluent shall be treated in ETP & reused in gardening purposes. The plant shall achieve ZLD.	Compliance assured.
vi)	No banned chemicals shall be manufactured by the project proponent. No banned raw materials shall be used in the unit. The project proponent shall adhere to the notifications/guidelines of the Government in this regard.	Compliance assured.
vii)	The project proponent shall comply with the environment norms for fertilizer Industry as notified by the Ministry of Environment, Forest and Climate Change, <i>vide</i> GSR 1607(E), dated 29.12.2017 under the provisions of the Environment (Protection) Rules, 1986.	Yes, RCF Trombay unit is complying all environment norms for fertilizer Industry as notified by the Ministry of Environment, Forest and Climate Change, <i>vide</i> GSR 1607(E), dated 29.12.2017 under the provisions of the Environment (Protection) Rules, 1986.
viii)	The species-specific conservation plan of Schedule-I species shall be implemented within time limit and as per the approval of the Chief Wildlife Warden of the State Government.	RCF has submitted the species-specific conservation plan of Schedule-I species for approval of Chief Wildlife Warden (CWW), Nagpur through Additional Principal Chief Conservator of Forest (APCCF), Maharashtra State. Approval of the conservation plan is awaited. Chief Wildlife Warden, Nagpur has sought map of the project site superimposed on Toposheet of Survey of India and marked with protected forest area with 10 KM radius of project site. Revised Maps as sought by CWW, Nagpur are being prepared and same shall be submitted through APCCF, Mumbai.
ix)	The project proponent shall utilize modern technologies for capturing of carbon emitted and shall also develop carbon sink/carbon sequestration resources capable of capturing more than emitted. The implementation report shall be submitted to the IRO, MoEF&CC in this regard.	No gaseous effluents are involved in the plant operations.

x)	All necessary precautions shall be taken to avoid accidents and action plan shall be implemented for avoiding accidents. The project proponent shall implement the onsite/offsite emergency plan/mock drill etc. and mitigation measures as prescribed under the rules and guidelines issued in the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996.	RCFL had onsite/ offsite emergency plan (ECP-Emergency Control Plan) as per statutory requirement and had submitted the document to the respective authorities. Regular mock drills are being conducted to check emergency preparedness and handling. The Emergency Control Plan will be revised for inclusion of Nano-urea plant activities.
xi)	The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.	The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs is being carried out by MOEFCC approved third party laboratory.
xii)	The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.	Compliance assured.
xiii)	The occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.	RCFL have fully functional Occupational Health Centre (OHC) with ambulance, qualified doctor and nurse. RCFL also have its own Hospital in company township which is approx. 1 KM away from factory.
xiv)	Training shall be imparted to all employees on safety and health aspects for handling chemicals. Safety and visual reality training shall be provided to employees. Action plan for mitigation measures shall be properly implemented based on the safety and risk assessment studies.	Safety training is a continuous process in RCFL, all plant employees, contractor employees, Tanker drivers & helpers etc. were given safety training in a periodic manner on safety and health aspects for handling chemicals. Safety and visual reality training shall be imparted to employees of Nano Urea plant on their deployment.

		RCFL has established ISO 45001, PSM & HSE index systems and continuously maintaining the same. Based on the safety and risk assessment studies of Nano Urea plant, action plan for mitigation measures shall be developed and implemented.
xv)	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.	<p>Firefighting system for Nano Urea plant shall be developed & established as per the norms and plant design requirement in coordination with project department.</p> <p>In Trombay unit factory premises, set up of full fledged Firefighting system with fire engines & other equipments/accessories and trained fire personnel is available round the clock. Mock drills are being conducted regularly.</p>
xvi)	The solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	Compline assured.
xvii)	The PP shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d)	<p>a) This will be complied after project will commissioned.</p> <p>b) No by-products in the process</p> <p>c) This will be complied.</p> <p>d) Manufacturing process is equipped with close feed system.</p> <p>e) Will be complied</p> <p>f) Will be complied</p>

	Use of Close Feed system into batch reactors. (e) Venting equipment through vapor recovery system. (f) Use of high pressure-hoses for equipment cleaning to reduce wastewater generation.	
xviii)	The activities and the action plan proposed by the project proponent to address the issues raised during the public hearing as well as the related socio-economic issues in the study area shall be completed as per the schedule presented before the Committee and as described in the EIA report in letter and spirit.	Compliance assured