



KR.HSE.ENV.05.HSSE.HECCR/01/2022/EC No: J-11011/552/2017-IA II (I)  
15.06.2022

To

The Additional Principal Chief conservator of Forests (C)  
Ministry of Environment, Forest & Climate Change  
4<sup>th</sup> Floor, E&F Wings, Kendriya sadan, Koramangala  
Bangalore-560 034

Dear Sir,

**Sub: Submission of Half yearly compliance report on Environmental Clearance issued by the Ministry of Environment, Forests and Climate Change (MoEF & CC)**

**Ref: MoEF&CC letter no. J-11011/552/2017-IA II (I) dated 30<sup>th</sup> October, 2018 granting Environmental Clearance for Polyols Petrochemical Project at Kochi.**

Ministry of Environment, Forest and Climate Change (MoEF&CC) vide the reference letter J-11011/552/2017-IA II (I) dated 30<sup>th</sup> October 2018 had accorded Environmental Clearance (EC) for the Polyols Petrochemical Project of BPCL Kochi Refinery. With reference to the aforementioned letter, please find enclosed Half Yearly Compliance Report (HYCR) for the period 1<sup>st</sup> October 2021 to 31<sup>st</sup> March 2022 on various conditions laid down by MoEF&CC. (Attached as **Annexure – 1**).

In addition to the above, Polyols project was approved by BPCL Board in Sep 2018 at an estimated project cost of Rs: 10000 crore (+/- 20). As per the proposal put up to the Board, the project was to be developed further by carrying out activities such as award for licensing of technology and related activities to licensing and appointing PMC. During the development of the project, cost estimate with an accuracy level of +/- 10 % was prepared based on Front End engineering design of the facilities and the estimated project cost has increased substantially from earlier estimate, mainly due to Global market condition post Covid pandemic. In Feb'22, BPCL board took decision to discontinue polyols project proposed at Kochi Refinery in view of substantial increase in project cost and consequent reduction in expected IRR.

Thanking you,

Very truly yours

For BPCL Kochi Refinery

  
General Manager in Charge (HSE)

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Encl: 1.Six Monthly Compliance Report  
2. Annexure 1 - Status of Green Belt \_ dated 31<sup>st</sup> March.2022

Cc:

- |  |   |
|--|---|
| 1. The Member Secretary<br>Central Pollution Control Board<br>Parivesh Bhawan<br>East Arjun Nagar<br>Delhi - 110 032   | 2. The Member Secretary<br>Kerala State Pollution Control Board<br>Plamoodu Junction<br>Pattom Palace<br>Thiruvananthapuram - 695 004 |
| 3 The Member Secretary (Industry –II), Ministry of Environment, Forest & Climate Change<br>Indira Gandhi Paryavaran Bhavan, Jorbagh Road, New Delhi - 110003 |   |

**ANNEXURE - 1**

MoEF&CC letter no. J-11011/552/2017-IA II (I) dated 30<sup>th</sup> October, 2018 - Half yearly compliance status for the period 1<sup>st</sup> October 2021 to 31<sup>st</sup> March 2022

<b>SPECIFIC CONDITIONS:</b>		
Sl.No:	Stipulated Compliance Conditions	Compliance Status
i	Consent to Establish/Operate for the project shall be obtained from the State Pollution Control Board as required under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974.	Will be complied. Consent to establish will be obtained from Kerala State Pollution Control Board. The Project is dropped by BPCL management.
ii	Discharge of treated effluent after conforming to the prescribed norms to the nearby waste body shall not exceed 30 cum/hr.	Will be complied, facility will be designed to comply with this condition.
iii	Necessary authorization required under the Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and Solid waste Management Rules, 2016 shall be obtained and the provisions contained in the Rules shall be strictly adhered to.	Will be complied.
iv	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21 <sup>st</sup> July, 2010 and amended from time to time shall be followed.	Treatment facilities are being designed to comply with national emission standards. Condition will be complied by BPCL -KR.
v	To control source and the fugitive emissions, suitable pollution control devices shall be installed with different stacks to meet the prescribed norms and/or the NAAQS. The gaseous emissions shall be dispersed through stacks of adequate height as per CPCB/SPCB guidelines.	All treatment facilities and measurement devices to comply with CPCB/SPCB guidelines will be installed & NAAQS /norms will be met. BPCL - KR will comply.
vi	Total fresh water requirement shall not exceed 32060cum/day to be met from Muvattupuzha River. Necessary permission in this regard shall be obtained from the concerned regulatory authority.	In Principle approval already obtained from Kerala State Irrigation department vide letter no W4-27818/2017/WE. Registration of land was completed. Final clearance for the facility and water takeoff was obtained from Kerala state Irrigation department vide letter no – F1-5766-17 dated 03-03-2020.

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vii	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	The Project is dropped by BPCL management.
viii	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm, and solvent transfer to be done through pumps.	Will be complied .All necessary precautions will be incorporated for storage and transfer of hazardous chemicals.
ix	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. The ash from boiler shall be sold to brick manufacturers/cement industry.	Organic residues and spent carbon are not expected to be generated in the complex. ETP sludge, Inorganic waste will be disposed-off to nearby TSDF identified for the purpose. Ash generation will not be occurring from boilers.
x	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.	MSIHC rules and MVA will be complied by BPCL-KR.
xi	Regular VOC monitoring to be done at vulnerable points.	VOC monitoring will be done using suitable measurement devices based on relevant CPCB guidelines and OISD guidelines.
xii	The oily sludge shall be subjected to melting pit for oil recovery and the residue shall be bio-remediated. The sludge shall be stored in HDPE lined pit with proper leachate collection system.	Oily sludge generation is not expected from the complex.
xiii	Comprehensive water audit to be conducted on annual basis and report to the concerned Regional Office of MoEF&CC. Outcome from the report to be implemented for conversation scheme.	BPCL-KR will comply to this condition after completion of the project..

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xiv	Oil catchers/oil traps shall be provided at all possible locations in rain/storm water drainage system inside the factory premises.	Oil catchers will be provided in the storm water sewer system of the facility. Being included in the design.
xv	The Company 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. c) Use of automated filling to minimize spillage. d) Use of Close Feed system into batch reactors. e) Venting equipment through vapor recovery system. f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.	BPCL KR will comply with this condition.  All of these best practices are being adopted in the design of the complex.
xvi	The green belt of 5-10m 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.	BPCL KR will comply with this condition.
xvii	At least 1% of the total project cost shall be allocated for Corporate Environment Responsibility (CER) and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry' Regional Office.	BPCL KR will comply.  Report with item-wise details will be submitted after firming up of details.
xviii	For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Will be complied.
xix	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.	All necessary firefighting facilities and safety systems will be provided as per relevant OISD norms and Petroleum Rules, MSIHC rules and other statutory guidelines. Approval for plot plan and safety systems will be taken from PESO.

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		Also international best practices for ensuring process safety is being adopted.
xx	Continuous online (24*7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. In case of the treated effluent to be utilized for irrigation/gardening, real time monitoring system shall be installed at the ETP outlet.	Real time monitoring of emissions from the complex will be carried out as per CPCB guidelines and in concurrence with SPCB.
xxi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Will be complied as per Factories Act.
xxii	The National Emission Standards for Petroleum Oil Refinery issued by the Ministry vide G.S.R 186(E) dated 18 <sup>th</sup> March, 2008 and G.S.R 595(E) dated 21 <sup>st</sup> August, 2009 as amended from time to time shall be followed.	Will be complied. Emission Treatment / process facilities are being designed to meet these effluent standards.
xxiii	The National Emission Standards for Petrochemical (Basic & Intermediates) issued by the Ministry vide G.S.R. 820(E) dated 9 <sup>th</sup> November, 2012 as amended time to time shall be followed.	Will be complied. Treatment facilities are being designed to meet these effluent standards.
<b>GENERAL CONDITIONS:</b>		
i	The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board, Central Pollution Control Board, State Government and any other statutory authority.	Will be complied.
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change. 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 environmental protection measures required, if any.	Will be complied.

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iii	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one station each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Will be complied and installed in consultation with State pollution control board.
iv	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16 <sup>th</sup> November, 2009 shall be followed.	Will be complied.
v	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 ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Will be complied
vi	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.	Will be complied. Facility is being designed for recycling of waste water and rain water harvesting.
vii	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 on handling of chemicals shall be imparted.	Will be complied. Already being practiced.
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, and risk mitigation measures relating to the project shall be implemented.	Will be complied. Compliance against this condition will be
ix	The Company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. ESC activities shall be undertaken by involving local villages and administration.	Will be complied

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x	The Company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Will be complied.
xi	The Company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/pollution control measures shall not be diverted for any other purpose.	Will be complied.
xii	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad /Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.	Already complied.
xiii	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF &CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.	Six monthly compliance reports submitted to MoEF&CC via e-mail and also uploaded in the website of BPCL. Link provided below <a href="https://www.bharatpetroleum.in/images/files/Polyols%20Compliance%20Report.pdf">https://www.bharatpetroleum.in/images/files/Polyols%20Compliance%20Report.pdf</a>
xiv	The environmental statement for each financial year ending 31 <sup>st</sup> March in Form-V as is mandated shall be submitted 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 clearance conditions and shall also be sent to the respective Regional Offices of MoEF &CC by e-mail.	Will be complied.
xv	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	Already complied.



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	<p>available with the SPCB/Committee and may also been seen at Website of the Ministry at <a href="http://moef.nic.in">http://moef.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 concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.</p>	
xvi	<p>The 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 start of the project.</p>	<p>The Board approval for the Polyols project was obtained on 28.Sept.2018. The date of start of project is considered from the Environmental clearance on 30.Oct.2018.</p> <p>Already complied. The project is currently in design and engineering phase and under Management Review.</p>