

***POINT-WISE STATUS OF CONDITIONS MENTIONED IN THE
“NO OBJECTION CERTIFICATE” VIDE NO. WB/T-843/89-90/154
DATED 01.09.1990
OF
POLLUTION CONTROL BOARD, ASSAM***

- 1. No Air, Water, Soil pollution shall be created by the industry beyond the permissible limits prescribed by this Board. The industry would incorporate adequate pollution control measures before they put the plant into operation.**

- This has been complied. For abatement of pollution, the following environment initiatives have been incorporated:

- *Effluent Treatment Plant with tertiary treatment facilities. This is further enhanced by implantation of ETP modernization and VOC recovery system in ETP. .*
- *Sulphur Recovery Block*
- *Ambient Air Quality monitoring*
- *Automatic online stack monitoring system*
- *Green Belt around refinery and NRMT*
- *Non-illuminating ground flare*
- *Low NOx burners incorporated in design*
- *Township sewage treatment plant and composting plant*
- *Hazardous oily waste and other solid waste management by Secured Landfill Facility, Bio-remediation and selling to approved recyclers.*

- 2. To maintain the environmental and ecology in the area provision for planting selected species of these within the compound and approaches along with provisions for park, garden and fountain shall have to be made. Massive afforestation will have to be made by the industry in the factory and township.**

-Within the refinery premises, few gardens have been developed near various units like Hydrocracker(HCU), Captive Power Plant (CPP), Effluent Treatment Plant (ETP), QC lab, Central Control Room (CCR) etc. Plantation of different variety of saplings have been widely carried out mainly along the all roadside areas all throughout the refinery. Fountain has been made in front of the Administrative Building. Massive plantations have been also carried out on all along the road sides in the Township and plantation also have been done in wide scale in the Butterfly Valley, Herbal garden, public places and club premises and few other places in the Township.

3. **As per provisions of water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981 any officer empowered, by this Board in its behalf shall without any interruption, the right at any time to enter the industry for inspection, to take samples for analysis and may call for any information etc. Violation of this right will be withdrawal of the “NO OBJECTION CERTIFICATE”.**

-This has been followed without any exception.

4. **As per provisions of the Acts, regular monitoring are to be done by the industry from the locations/points fixed by this Board and the reports to be submitted to the Board timely as prescribed.**

- Regular monitoring of air pollution and effluent quality has been carried out and results are submitted to the PCBA Regional office, Golaghat in every month.

5. **Effluent carrying drains must be segregated from storm water drains and effluent must be disposed in effluent pond. In no case, effluent will be discharged into nearby nullah / natural watercourse etc. without treatment and bringing it within ISI permissible limits or limits fixed by the Board.**

-Effluent collection and segregation philosophy was submitted to PCBA. Discharge of any effluent ex-refinery into the River Dhansiri has been stopped since October, 2006.

6. **Standard linings and flat embankment of effluent pond shall have to be provided in the pond to prevent and control of overflow, seepage and leakage of effluent to the nearby areas.**

-This was incorporated in the design of the storage ponds of the Effluent Treatment Plant and constructed accordingly.

7. **To regularise the subsequent process, the legal provisions of CONSENT LICENCE and RETURNS shall have to be timely adhered to.**

-Submission of application for revalidation of Consent from PCB, Assam for running of the various units and Returns are being timely adhered to.

8. **Gaseous pollutants due to the burning of the fuel to run engine, boiler, etc. should be controlled by adopting preventive measures.**

-Low NOx burners have been installed in all the furnaces and also, low sulfur fuels are being used.

- 9. Solid waste that arises during the operation should be properly graded and disposed off scientifically without causing nuisance.**

-Solid waste has been properly graded, hazardous oily waste and other solid waste disposed off through the Secured Land Fill facility and bio-remediation after taking due authorization from PCBA. Spent catalyst is disposed off through approved recyclers and few quantity of oily sludge has been sold to approve recyclers.

- 10. For low-lying areas, special care is to be taken by the Industry to prevent any overflow, seepage and leakage of the effluent.**

-Does not arise.

Presently no effluent is discharged from the refinery and township into the River Dhansiri or any water Body.

- 11. For warning systems (Alarm, Siren) is to be installed by the Industry to guard against accidental pollution/mishap together with fire fighting devices.**

-Sirens have been installed at the refinery site and Township to alert workers on emergency and a complete fire fighting network has been installed. Fire tenders are readily available at site and in operation.

- 12. All pipes connections, joints, fittings etc in the factory and plant are to be frequently checked and leak proof all the time by the industry.**

-These are being physically checked on regular basis and in case of any leakage corrective action is taken at the earliest. However, for the detection of very minor gas/vapour leak - fugitive emission monitoring is done on regular basis by using Gas Measuring Instrument and rectified the leaking points on priority. In additions, acoustic survey is also carried out in various units in regular intervals.

- 13. Proper house keeping and adequate maintenance has to be ensured/enforced as per provisions of the Acts.**

- This is complied.

- 14. All unwanted/toxic chemicals/fluid/gases are to be neutralized and flared up as necessary.**

-The point is adhered to without any deviation.

- 15. Production process is to be monitored and in the event of danger, immediate shutdown is to be ensured by the Industry.**

-Production process is continuously being monitored from the Control Room and applicable step is initiated as per requirement.

- 16. Provisional “NO OBJECTION CERTIFICATE” will be valid till the proposed date of commissioning of the plant.**

-Noted

- 17. The provisional “NO OBJECTION CERTIFICATE” has been issued being on the particulars furnished by the applicant and subject to imposition of further/more conditions if warranted by the subsequent development.**

-Noted

- 18. Healthy working environment for the workers must be maintained and there should not be health hazard to the workers for inadequate arrangements for ventilation, dust removal etc. Arrangements should be adequate and full proof for the health of the workers. Their health should be regularly monitored.**

- NRL follows OISD – GDN – 166 Guideline for Occupational Health Hazard monitoring to provide specific level of occupational health & hygiene services to the employees and necessary health care.

This includes:

- a) Work Environment monitoring – Occupational hygiene.*
- b) Pre-employment / Pre-placement medical examination.*
- c) Periodic health check-up / examination.*
- d) Infrastructure for occupational health monitoring.*

The Frequency for Periodic health check-up / examination of NRL has been decided as follows:

| <i>Sl. No.</i> | <i>Area</i> | <i>Frequency</i> |
|----------------|-----------------------|---|
| <i>1.</i> | <i>Hazardous</i> | <i>Half- yearly</i> |
| <i>2.</i> | <i>Less hazardous</i> | <i>Annually</i> |
| <i>3.</i> | <i>Non- hazardous</i> | <ul style="list-style-type: none"><i>• Annually the employees of age 50 yrs and above.</i><i>• Once in 2 yrs for employees of age group 40 – 50 yrs.</i><i>• Once in 3 yrs for employees of age group below 40 yrs.</i> |

- 19. The Industry must submit compliance report of action taken on the conditions given by the Board before commissioning of the Plant.**

-Complied.

- 20. Adequate trees should be planted and maintained in the vacant spaces of the premises and all around the factory and township.**

Massive plantation of different variety has been carried out mainly along the roadside areas, vacant places, in ETP and in the gardens within the Refinery as well as Township also.

- 21. The Board will be at liberty to withdraw the “NO OBJECTION CERTIFICATE” at any time without notice if necessary steps for prevention of pollution and preservation of environment is not taken by the Industry as per mentioned condition.**

-Noted.

- 22. The issuance of this NOC does not convey any property right in either real or personal property or any exclusive privileges nor does it authorises any injury to private property nor any invasion right nor any infringement of Central, State or Local Laws or Regulations.**

-Noted.

- 23. The NOC does not authorize or approve the construction of any physical structures of facilities or the undertaking of any work in any natural watercourse except of the works specially instructed herein.**

-Noted.

- 24. Effluent treatment plant must be constructed before commissioning of the plant and the treated effluent must conform to the MINAS and IS: 2490 all the time.**

-The Effluent Treatment Plant equipped with tertiary treatment facilities constructed before the commissioning of the plant. Treated effluent quality is checked regularly as per new MOEF notifications before every discharge from ETP for reuse in the Laboratory and has been intimated regularly to PCB, Assam and CPCB, Shillong on monthly basis. It is worth-mentioning that since October, 2006 no effluent has been discharged outside the refinery. This is further enhanced by implantation of ETP modernization and VOC recovery system in ETP.

- 25. Construction of Effluent Treatment Plant must be started before starting the construction of the Refinery itself.**

-That has been complied

- 26. Treated effluent shall be discharged through a closed pipeline into the mid-stream of river Brahmaputra after confluence point of Dhansiri river and arrangement is to be made by the Refinery authority for proper mixing.**

-Permission has been obtained from PCB, Assam to discharge treated effluent at the downstream of jetty in the mid-stream of river Dhansiri through a closed pipeline.

However, no treated effluent has been discharged since October, 2006 into the River Dhansiri or any other natural water body as 100% reuse of treated effluent is sustained.

- 27. The applicant shall provide sampling arrangement in the treated effluent carrying closed pipeline at two sites i.e. near NH crossing and before the final outfall point at Dhansiri mukh. Easy access for the sample collection at these two sites will have to be made by the Refinery Authority.**

-Provision for sampling has been made at various locations in the EDPL at the initial point of the pipeline, near Township and at the final discharge point. However, the requirement is not applicable at present as no treated effluent is discharged outside the refinery. 100% reuse of treated effluent is sustained.

- 28. Regular monitoring is to be done for the parameters, TOC and others as mentioned in MINAS and reports are to be submitted fortnightly to the Board.**

- The relevant parameters for treated effluent have been monitoring regularly as per the latest CPCB norms and the monitoring reports are being submitted regularly to the PCBA, Regional Office, Golaghat, CPCB Zonal Office, Shillong on monthly basis as per requirement stipulated in the Consent for the refinery.

- 29. The detailed design of the ETP will have to be submitted to the Board before starting construction of ETP.**

- The same has been submitted before starting the construction of ETP.

- 30. The time schedule for construction and commissioning of the ETP should be submitted to the Board quarterly.**

- This has been complied.

31. Necessary arrangements for sample collection at the following points are to be provided by the industry before commissioning of the plant.

- a) Before entering ETP
- b) Before aerobic system of ETP
- c) After leaving ETP (on EDPL)
- d) At interim point of effluent carrying pipeline near NH crossing
- e) Ultimate point of effluent discharge

-Sampling points as required have been provided.

32. Samples will have to be collected and analyzed by the industry from the above points as per condition 31 above and as well as from the following points.

- a) **Near each village situated on the bank of the Dhansiri River.**
- b) **Receiving water course (i.e. Brahmaputra) after it receives effluent from the refinery.**

The applicant is to submit the monitoring results to the Board fortnightly.

-The discharge of treated effluent from the Refinery and from the STP, NRL Township has been stopped since October, 2006 and April, 2007 respectively, as such Monitoring of Dhansiri water becomes irrelevant. Request has been placed to PCBA for discontinuation of the same.

33. Recording and monitoring activities and results:

- a) M/s. IBP Co. Ltd., are to monitor effluent everyday and maintain records of all information resulting from monitoring activities.
- b) The industry is to record for each measurement for samples to be taken to the requirement of this NOC with the following information.
 - i) The date, exact place and time of sampling
 - ii) The dates on which analysis performed
 - iii) Who perform the analysis
 - iv) Method used for the analysis
 - v) The results of all required analysis
- c) The industry is to retain for minimum of five years of all records of monitoring activities and results including all records. This period of retention shall be extended during course of any unresolved litigation regarding the discharge of Pollutants by the applicant or when required by the Board.

Regular monitoring of effluent quality has been carried out and records are kept properly.

- 34. Monitoring information shall be submitted and reported by submitting a discharge monitoring report form duly filled in and signed to the Boards Office.**

- This is complied.

- 35. The applicant will have to install automatic pH recorder, flow recorder and TOC analyzer on the effluent carrying line.**

-Flow recorder, TOC analyser and automatic pH recorder have been installed in ETP to monitor the effluent quality going through the Effluent Disposal Pipeline (EDPL). However, the discharge of treated effluent from the Refinery and from the STP, NRL Township has been stopped into River Dhansiri since October, 2006 & April, 2007 respectively.

- 36. The applicant shall not discharge effluents in excess defined as harmful in the NOC. In addition the refinery shall not discharge hazardous substances into watercourses in quantities defined as harmful in the NOC given by the Board.**

- There is no discharge of effluent from the refinery into River Dhansiri since October, 2006. No hazardous substances are discharged into any watercourses.

- 37. Nothing in this NOC shall be deemed to preclude than institution of any legal action nor receive from any responsibilities or penalties to which the industry is or may be liable.**

-Noted.

- 38. Applicant shall take adequate and efficient measures so that sulfur is recovered fully and there will not be any release of Sulfide in the effluent. Special monitoring arrangement is to be carried out by the applicant after the coagulation unit as well as at final outlet before disposal.**

-To minimize sulphur pollution, a Sulphur Recovery Block has been installed and is functioning continuously. Monitoring of sulphide in the effluent is done regularly before every reuse and sulphide level in the final treated effluent is maintained well within the standards.

- 39. The applicant must take special care to contain all the untreated effluent within their compound at the time of malfunctioning of ETP and must be treated to the prescribed limit before disposal.**

-Guard ponds and Surge Tanks of sufficient holding capacity have been provided in ETP to cater for emergency need. This is further enhanced by implantation of ETP modernization and VOC recovery system in ETP.

- 40. Refinery authority must take special care to keep the noise level within permissible limit all the time. As suggested by NEERI, Green belt development is to be taken up right from the time of construction.**

- A Green Belt covering a total area of around 60 hectares of land and around 100 mtrs width around the refinery and around 25 mtrs width around the NRMT has been developed as per the Green Belt Development Plan. (The Green Belt Development Plan has been submitted to MoEF along with the Half Yearly Report to MOEF on the 15th October, 2001).

Massive Plantation have been carried out in the Green Belt so as to it can provide a natural barrier for attenuation of noise and air pollution. Nos of local variety have been planted including some fruit bearing samplings in & all around Green Belt.

Phase wise replantation is in progress in various locations in Green Belt to increase the density.

-Noise monitoring inside the work zone has been carried out on a regular basis, and if required, corrective action is taken accordingly.

- 41. Authority shall take adequate care to keep the impact of noise within the limit at the time of loading/unloading and transportation etc.**

-Adequate care has been taken.

- 42. IBP Ltd. shall construct and commission the sewage treatment plant for their Township area and the treated effluent must confirm IS standards before discharging, special care must be taken to contain the pathogens and coliforms within count before discharge.**

-A separate Sewage Treatment Plant for Township area has been constructed and in operation. No effluent is discharged into River from STP, the same has been routed back to ETP at refinery.

- 43. Disposal of Sludge:**

a) Intake Water Treatment:

Solids, sludges, dust, silt or other pollutants separated from or water prior to use by IBP Ltd. shall be disposed off in such a manner as to prevent any pollutant from such materials from entering any such water. Any live fish or other animals

collected or trapped as a result of intake water screening or treatment may be returned to water body habitat.

-This has been complied.

b) Waste /Water Treatment:

For disposal of sludge from the treatment plant, IBP Ltd., shall have to take separate specific permission from this Board. IBP Ltd. shall apply for such permission giving three months time for detailed scrutiny of their proposal for disposal off should be intimated to the Board immediately. Detailed proposal for sludge disposal shall be submitted by IBP Ltd. immediately.

-Based on NEERI's report on Solid Waste Management, one Secured Land Fill was constructed for disposal of sludge from the treatment plant / solid waste. Proposal of the same was submitted to both i.e. MoE&F and PCB, Assam and due permission for disposal of sludge in the Secured Landfill was received from PCB, Assam. NRL has installed another SLF of capacity 6000 m³ as per CPCB recommendations.

c) Hazardous waste disposal:

For disposal of hazardous waste generated from the refinery, IBP Ltd. shall have to take specific permission from the Board separately.

-Hazardous waste disposal was incorporated in the above proposal and authorization has been granted for disposal of sludge in the Secured Landfill by PCB, Assam. Some quantity has been sold to authorised recyclers.

d) Spent Catalyst:

Spent Catalysts must be disposed off through sale only. No spent catalyst should be disposed at landfill site and must not be buried underground in concrete silo/bunker under any circumstances.

- Spent catalyst has been sold to the CPCB registered purchasers.

e) Sewage Treatment:

Solid waste generated in the sewage treatment plant should be disposed off in a proper scientific manner so that it will not create any health hazard in the environment.

-Sludge drying beds have been provided in the Sewage Treatment Plant at Township

44. Before applying “Consent To Operate” after commissioning for discharge of treated effluent, the applicant must clarify to the Board that IBP Ltd. have installed an alternative electric power source sufficient to operate all the facilities utilized by the applicant to maintain compliance with terms and conditions of this NOC.

- Complied.

45. Arrangements are to be made for analysis of bottom sludge of their units particularly of the heavy metals.

- Equipment for analysis of heavy metals in bottom sludges like Atomic Absorption Spectrophotometer, Flame Photometer and Spectrophotometer have been procured.

46. The applicant shall analyze the solid waste and submit the report to the Board regularly.

-Analysis of solid waste has been carried out regularly and submitted to Pollution Control Board.

47. The applicant shall take adequate care to contain the raw materials, chemical products etc within the site itself and proper protection arrangements will have to be made around the raw material, product storage area. No seepage/leakage shall take place from this area.

Raw materials and products are stored in their respective tanks with all the necessary precautions required for.

48. Height of chimneys shall be such that it allows proper dilution of the emitted as and it shall not be less than 30 mtrs under any circumstances.

-All the chimney heights are much more than 30 mtrs.

49. Stack emissions from the industry must meet the standards prescribed by PCB and Dept. of Environment, Govt. of India all the time.

-Monitoring of stack emission has been carried out regularly as per the latest MOEF notification and are well maintained within the standards. The monitoring results are submitted regularly to the PCBA Regional Office, Golaghat, Shillong as per the requirements.

50. The applicant is to contain the total sulphur emission into the atmosphere as SO₂ within 256 kg/hr.

-This is complied

51. Fugitive emissions from the refinery should not be more than 6.11 kg/hr.

- *Regular monitoring of fugitive emission has been carried out in various locations inside the refinery using GMI.*

The GMI survey has been carried on all gas/vapour valves, light liquid valves, hydrogen valves, light liquid pump seals, hydrocarbon compressor seals, hydrogen compressor seals, safety relief valves, flanges, connections, open-ended lines, drains, tankages, furnaces etc.

52. Ground Level conc. of SO₂ and NO_x at Kaziranga National Park, due to the release of gases from the refinery shall not exceed 2.25 and 3.51 microgram per cubicmetre resp. during highly unstable condition. Also, during stable condition, SO₂ and NO_x shall not exceed 25.0 and 39.0 microgram per cubicmetre resp.

-As a compliance of the above, an Air Quality Monitoring Station has been installed at Agratoli, near Kaziranga to monitor the required parameters on a regular basis. The same have been monitored regularly and the value found within limit. Action initiated to install another CAAQMS inside the refinery premises in the down wind direction.

53. The refinery authority must also contain the CO, HC within the specified limit and as per NEERI's report.

-CO and HC are monitored along with the parameters SO₂, NO_x and SPM in the ambient air quality monitoring. The same are found to be within standards as prescribed in the Consent for Numaligarh Refinery by PCB, Assam.

However, NRL has started monitoring of ambient air quality in line with NAAQS-2009 in totality since April' 2011. Further, real time emission data has been transmitted to CPCB server on continuous basis.

54. IBP Ltd. must install automatic SO₂ and flow measuring device at all the stacks. If at any stage SO₂ exceeds the permissible limits immediate shutdown of operations will have to be ensured.

-Automatic SO₂ online analysers have been installed in all the refinery unit stacks. The total SO₂ emission in terms of kg/hr from the stacks is done on the basis of fuel consumption in the furnaces and sulphur content in the fuel.

55. Systematic Green Belt development is to be made by the applicant in and around the refinery site as well as in Township area. Selected trees should be of fast growing with thick canopy cover, perennial and evergreen, with large leaf area, resistant to specific air pollutants.

-A Green Belt of around 100 mtrs width around the refinery and around 25 mtrs width around the NRMT covering a total area of land around 60 hectares has been developed. The Green Belt has been developed & maintain as per the Green Belt development plan.

56. The applicant will have to take Socio-Economic Development of the area.

-Various forms of Community Development Schemes have been carried out regularly.

57. Ambient Air Quality Monitoring is to be done daily by the industry in and round factory as well as at Kaziranga National Park and results must be submitted monthly to the Board.

- The ambient air quality monitoring is being carried out at 5 locations at a frequency of 8/9 samples per month, taken twice a week 24 hourly at uniform interval. (This is as per the statutory requirement of CPCB, where the minimum no. of samples to be analyzed for a station is 104 samples in a year). The monitoring results are submitted regularly to the PCBA Regional Office, Golaghat and CPCB Regional Office, Shillong in every month.

However, NRL has started monitoring of ambient air quality in line with NAAQS-2009 in totality since April' 2011. However, NRL has started monitoring of ambient air quality in line with NAAQS-2009 in totality since April' 2011. Further, real time emission data has been transmitted to CPCB server on continuous basis.

58. Stack Monitoring is to be done daily and results must be submitted fortnightly to the Board.

-This has been complied.

59. The applicant is to submit the detailed Environmental Management Plan, Disaster Management Plan, and Project Report before commissioning the refinery

-The reports have been submitted.

60. The applicant will have to install water meters at all the water carrying pipelines before commissioning the refinery.

-Water meters have been installed on all the water carrying pipelines.

61. Automatic pH monitoring of effluent should be provided for by installing automatic pH indicator and recorder.

-Automatic pH analyzer has been installed.

62. Suitable flow measuring arrangements with automatic measuring devices should be installed in the outlets to measure accurately the quantities of effluents discharged. No effluent shall remain unmeasured and records of daily flow should be maintained.

- Flow meter with totalizer has been installed on the effluent discharge pipeline and records are maintained daily. The treated effluent is reused in the Refinery premises only, there is no discharge into River Dhansiri.

63. The applicant is to take special care to raise the height of Electric Poles including towers so that animals can pass the area safely. If necessary, alternative arrangements is to be made for safe movement of animals.

-Steps have been taken accordingly.

64. The refinery authority will have to strictly adhere to the provisions of the Water (Prevention and Control of Pollution) Act, 1974; Water (Prevention and Control of Pollution) Amendment Acts, 1978 &1980; Air (Prevention and Control of Pollution) amendment Act, 1981; Environment (Protection) Act 1986.

- This is complied.

65. The Board will be at liberty to withdraw the “NO OBJECTION CERTIFICATE” at any time without notice if necessary steps for Prevention and Control of Pollution and preservation of environment is not taken by IBP Ltd. as per above mentioned conditions.

-Noted.
