भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED

A Govt. of India Enterprise

Kochi Refinery

03/E&E/202/04 27.06.2017

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

Dear Sir,

Sub: Submission of Half yearly compliance report – Environmental Clearance issued by the Ministry of Environment, Forests and Climate Change

Ref: MoE&F's letter No: J-11011/369/2005-IA II(I) dated 2nd February 2006, granting environmental clearance for Capacity Expansion cum Modernisation Project(Phase-II).

Please find enclosed the compliance report on the various conditions laid down by MoEF &CC, pertaining to the half year period from October 1^{st,} 2016 to March 31st, 2017 for the Project mentioned in above reference.

Thanking you

Very truly yours For BPCL Kochi Refinery

Damien Gracious

General Manager (HSE)

Encl: 1.Status compliance Report

- 2. Annexure -I, Emission Details
- 3. Annexure -II, Ambient Air Details
- 4. Annexure III, Quality of Effluent discharged
- 5. Annexure IV, CREP compliance
- 7. Annexure V, General details

Cc:

- 1. The Member Secretary Central Pollution Control Board Parivesh Bhawan East Arjun Nagar Delhi - 110 032
- 2. The Member Secretary
 Kerala State Pollution Control Board
 Plamoodu Junction
 Pattom Palace
 Thiruvananthapuram 695 004

		hydrocarbon detectors and 62 numbers of hydrogen sulphide detectors are installed at different locations of refinery including product loading, storage tank farms, process plants etc. I) Benzene monitoring using "Drager" chip in the Aromatic Recovery Unit m) Five numbers of online ambient air quality monitoring stations (AAQMS)
f)	The flare losses to be minimized and monitored regularly	Flare losses are monitored continuously through flare meters installed in the process units on a daily basis and are reviewed at the senior management level Further, the fuel gas flow to the pilot burner is maintained at the minimum level required to sustain the pilot flame. Various process schemes implemented to reduce flaring. Advanced process control (APC) system was implemented in hydrogen network for decreasing hydrogen flaring.
g)	Refineries will install continuous emission monitoring systems for SO ₂ and NOx in major stacks. Action plan for this will be submitted within six months	Kochi Refinery has provided continuous SO ₂ and NOx analyzing system for all the heater/boiler stacks above 10 million.
h)	Refineries will also monitor total HC and Benzene in the premises (particularly in loading / unloading operations and ETP). The status and action plan will be submitted within six months	Twenty nine hydrocarbon detectors are installed in the truck loading/wagon loading areas, while thirteen numbers are installed in the LPG bottling plant. Benzene monitoring is carried out using "Drager" chip technique in the Aromatic Recovery Unit on a daily basis. Five online ambient air quality monitoring stations (AAQMS) are installed
2.	Waste Water Management:	
a)	Refineries will prepare an action plan for conservation of water resources and maximizing reuses / recycles of treated effluent within six months. The treated effluent discharge quantity will be limited to 0.4 m3/tonne (for 90% of time) except for the monsoon season:	The discharge of treated water from Kochi Refinery is 0.19 m³ / tonne of crude processed for the year half year Oct 2016 – Màr 2017. Steam condensate in process plants is being recycled back to the boilers as feed water for steam generation. Approximately 200-250 Kl/hr steam condensate is being recycled to steam boilers in the refinery. Stripped water recycled for desalting process in crude units at the rate 70 -100 Kl per hour. Treated effluent is used for firefighting purposes, process area cleaning and for watering of plants and trees inside refinery and colony premises. Installed four rainwater harvesting schemes with a view to conserve water resources. Two numbers roof top rain water harvesting schemes for make up to CW Two numbers rain water harvesting ponds have been constructed at ACTP and Shore tank farm areas to collect the surface run-off water.

SI No	Conditions	Status as on 31.03.2017
	shall be installed in all the 4 directions in consultation with the KSPCB. Data shall be regularly monitored and records maintained and report submitted to the Ministry/CPCB/KSPCB once in six months.	Online datas are being continuously transferred to CPCB from all the AAQMS stations. Data on ambient air quality for the period from October 2016 to March 2017 is attached as Annexure-II.
4.	As indicated in the EIA/EMP reports, out of total 1700 m³/d industrial effluent generated, 360 m³/d sour water will be recycled in the plant after stripping of Ammonia and Hydrogen Sulphide and will be used for desalting of crude in desalters and as wash water in air fin condensates etc. Besides, 300 kl/d, treated waste water will be used for fire fighting, process area cleaning, cooling water make up and for green belt development. Remaining treated effluent will be discharged to Chitrapuzha river after conforming to the prescribed standards. Generation of waste water shall be reduced by installation of sour water stripper unit; use of closed blow down system for all hydrocarbon liquid discharge from the process units, proper segregation and collection of various effluents; paving the process area to avoid contamination of soil, ground water, comprehensive waste water management etc.	Chithrappuzha conforms to the standards. 300 KL/day of this treated effluent is being used for fire fighting, process area cleaning and green belt development.
5.	No ground water contamination in and around factory premises shall be ensured by making all the underground lines carrying hydrocarbons, closed drainage system, storage tank etc. leak proof in order to avoid any leakages. Regular monitoring of ground water in and around factory premises shall be carried out by installing piezometer wells and six monthly reports shall be submitted to the Regional Office of this Ministry at Bangalore/CPCB/KSPCB.	Hydrocarbon storage tanks are provided with MS plates at the bottom to avoid leaching of oil to land. Moreover LDPE lining is also provided on the tank pad of new tanks as an additional precaution to

SI No	Conditions	Status as on 31.03.2017
6.	The domestic waste water shall be treated in the sewage treatment plant and treated waste water conforming to the standards for land application shall	STP of 250 m ³ /day capacity has been installed and running continuously for treating the domestic waste water.
	be reused for green belt development.	The treated effluent is being used for green belt development.
7.	Regular monitoring of the quality of effluent discharged and at river water intake point shall be ensured to ensure no pollution of the Chitrapuzha river.	Quality of effluent discharged into the Chitrapuzha river is analysed and monitored on a regular basis to ensure no pollution of the Chitrapuzha river. The river water intake to refinery is located at Periyar river and the quality of the same is also monitored.
8.	In-plant control measures for checking fugitive emissions from spillage/raw materials handling etc. should be	Closed Blow Down (CBD) systems are provided in all process plants to enable closed loop recycling of all hydrocarbon drains, without fugitive
	provided. Proper maintenance of equipments shall be ensured to reduce fugitive emissions.	emissions. Double seal floating roof are provided for all the Crude tanks. Hydro carbon detectors are provided as per requirement. Proper maintenance of equipment (including preventive maintenance) is carried out
9.	Solid waste generated in the form of oil sludge, chemical sludge, catalyst, spent molecular sieves and bio-sludge shall be properly treated / reprocessed / reused or properly disposed off. Spent catalyst, a hazardous waste shall either be sent back to supplier(s) for	
	reprocessing or disposed off in the secured landfill. Oil sludge shall be subjected to maximum recovery followed by bio-remediation. Bio-sludge for ETP shall be used as manure after ensuring all the parameters within the	original supplier or selling to the recycler or is disposed in secured land fill. ETP Chemical sludge is disposed in secured
	permissible limits whereas chemical sludge from ETP shall be collected and disposed in Secured Landfill (SLF).	
10.	Green belt of adequate width and density shall be provided to mitigate the effects of fugitive emissions all around the plant. Green belt shall be developed in 116 hectares out of total 461.7	Greenbelt is developed and maintained in the refinery premises. Post-IREP project green belt development is in progress.
	hectares land with local species in consultation with the DFO and as per the CPCB guidelines.	
11.	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	

SI No	Conditions	Status as on 31.03.2017
12.	As committed in the EIA/EMP report, the company shall earmark Rs.78.30 crores for environment protection measures and Rs.51.00 crores for community development activities.	Complied
13.	All the other recommendations made in the Charter on Corporate Responsibility for Environment Protection (CREP) for the Refinery sector shall be implemented. CREP guidelines regarding discharge of treated effluent within 0.4 m³/MT of crude shall be strictly followed.	Complied. The discharge of treated effluent was 0.19 m³/MT of crude throughput for the half year period from October 2016 to March 2017.
В.	GENERAL CONDITIONS:	
1.	The project authorities must strictly adhere to the stipulations made by the KSPCB and the State Government.	Complied.
2.	No expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment & Forests.	Complied.
3.	Adequate AAQMS should be established in the downward direction as well as where maximum ground level concentration of SPM, SO ₂ and NOx are anticipated in consultation with the KSPCB. Data on ambient air quality, fugitive emission and stack emissions shall be regularly submitted to this Ministry including its Regional Office at Bangalore and KSPCB once in six months.	In consultation with KSPCB, the refinery has installed five continuous AAQMS stations. Online data are being continuously transferred to CPCB from all AAQMS stations. Data on ambient air quality during the half yearly period from October 2016 to March 2017 is attached as Annexure-II. Data on stack emissions during the half yearly period from October 2016 to March 2017 is attached as Annexure-I.
4.	The overall noise levels in and around the plant area should be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules. 1989 viz. 75 dBA (daytime) and 70 dBA (night time).	Complied
5.	The project authorities shall provide adequate funds (both recurring and non recurring) to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the	Complied.

SI No	Conditions	Status as on 31.03.2017
e .	implementation schedule for all the condition stipulated herein. The funds so provided should not be diverted for any other purposes.	
6.	The Regional Office of this Ministry at Bangalore/CPCB/ KSPCB will monitor the stipulated conditions. A six monthly compliance report and the monitored data along with statistical interpretation should be submitted to them regularly.	Complied.
7.	The company shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the KSPCB / Committee and may also be seen at Website of the MioE&F at http:/envfor.nic.in. This should 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 should be forwarded to the Regional Office.	Complied.
8.	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 commencing the land development work.	Complied and the project has been commissioned.

DATA ON STACK EMISSIONS OCTOBER 2016 - MARCH 2017

RMITTED STATUTORY	PERMITTED ST	
MISSION STIPULATION SPCB	EMISSION STIPULATION SPCB	
Nm3/hr mg/Nm3	,	,
MIM	IIW .	IIW
130000		
45000		
102000 670		
25000		
85000		
150000		
75000		
136000		
70000		
35000		
82500		
27000		
130000 PM - 100 mg/ mm 3 193	PM - 100 mg/ N:m3	PM - 100 mg/ N:m3
35000 FOR DSX 002 254	FOR DSX 002	FOR DSX 002
anding	Sulphur recevery - 36.7 /8	Sulphur recevery - 36.7 /8
277900 FOR DSX 301 608	FOR DSX 301	FOR DSX 301
22000 718		
51000		
427000		
158000		
118000 672		
72000 659		
22000		
757		

AMBIENT AIR QUALITY DATA FOR THE HALF YEAR PERIOD. OCTOBER 2016 - MARCH 2017

	ACTP										
PARAMETER	UNIT	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17				
SO2	ug/m3	18.52	21.08	22.68	30.45	32.49	30.89				
NOx	ug/m3	44.98	29.63	30.48	25.88	23.75	24.28				
NH3	ug/m3	0.04	2.04	0.24	0.11	0.21	0.22				
CO	mg/m3	0.66	0.93	0.94	0.97	0.93	0.78				
Benzene	ug/m3	0.22	0.08	0.04	0.02	0.03	0.01				
Methane	ppm	0.54	0.52	0.71	0.01	0.00	0.01				
NMHC	ppm	0.11	0.13	0.38	0.13	0.13	0.07				
PM 10	ug/m3	71.49	103.60	72.19	105.87	101.25	84.01				
PM 2.5	ug/m3	41.72	72.60	70.40	69.61	67.34	41.71				

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			COLO	NY			
PARAMETER	UNIT	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17
SO2	ug/m3	7.46	7.97	9.57	9.77	12.15	12.75
NOx	ug/m3	29.65	30.96	26.53	26.55	30.13	27.41
NH3	ug/m3	6.07	3.57	5.19	5.23	3.86	5.43
СО	mg/m3	1.07	1.68	0.81	0.81	0.93	0.88
Benzene	ug/m3	0.00	0.00	0.00	0.00	0.00	0.00
Methane	ppm	0.06	0.08	0.00	0.00	0.04	0.03
NMHC	ppm	0.10	0.14	0.00	0.00	0.15	0.21
PM 10	ug/m3	56.29	87.50	93.28	93.23	93.73	63.60
PM 2.5	ug/m3	32.04	67.37	66.30	66.16	61.33	36.80

	DHDS										
PARAMETER	UNIT	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17				
SO2	ug/m3	15.44	11.80	14.80	25.10	27.10	33.60				
NOx	ug/m3	12.36	23.20	20.70	20.80	18.40	22.70				
NH3	ug/m3	0.00	0.00	0.00	0.10	0.00	0.00				
СО	mg/m3	0.67	1.22	0.53	1.51	0.77	0.36				
Benzene	ug/m3	0.28	0.21	0.15	0.21	0.07	0.05				
Methane	ppm	0.00	0.00	0.00	0.00	0.00	0.00				
NMHC	ppm	0.01	0.01	0.16	0.24	0.12	0.20				
PM 10	ug/m3	47.21	70.90	67.60	62.20	80.40	58.20				
PM 2.5	ug/m3	26.46	48.30	44.60	42.10	49.80	33.90				

	2-12-	W	AGON LOA	DING			
PARAMETER	UNIT	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17
SO2	ug/m3	19.74	23.56	19.20	12.95	13.40	14.56
NOx	ug/m3	13.45	22.52	16.93	18.26	14.73	. 11.00
NH3	ug/m3	17.70	13.93	11.50	16.05	15.40	10.87
СО	mg/m3	0.46	0.76	0.02	NA	NA	NA
Benzene	ug/m3	0.08	0.05	0.05	0.04	0.03	0.01
Methane	ppm	0.29	0.32	0.45	0.15	0.18	0.68
NMHC	ppm	1.77	1.97	1.94	1.75	1.62	1.35
PM 10	ug/m3	43.69	68.72	63.30	67.74	74.00	67.15
PM 2.5	ug/m3	20.95	40.41	35.90	34.96	39.10	30.12

NHT/CCR									
PARAMETER	UNIT	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17		
502	ug/m3	17.01	14.27	12.11	24.36	20.50	14.64		
NOx	ug/m3	27.03	28.80	28.55	31.74	30.27	21.80		
NH3	ug/m3	22.91	16.93	27.29	43.80	49.92	109.16		
СО	mg/m3	0.00	0.00	0.00	0.00	0.00	0.00		
BENZENE	ug/m3	0.00	0.00	0.00	0.00	0.00	0.00		
METHANE	ppm	0.92	0.99	0.65	1.20	0.73	0.65		
NMHC	ppm	1.72	1.80	1.99	1.70	1.94	1.98		
PM10	ug/m3	33.84	40.77	39.18	39.31	46.32	50.19		
PM2.5	ug/m3	13.60	19.53	17.61	15.83	18.75	28.52		

TREATED EFFLUENT QUALITY DATA

OCTOBER 2016 - MARCH 2017

		EFFLUEN	IT MONITORIN	G STATION (OUTLET A		
MONTH	OIL & GREASE (mg/L)	PHENOL (mg/L)	SULPHIDES (mg/L)	TSS (mg/L)	BOD 3 DAYS AT 27°C (mg/L)	COD (mg/L)	рН
	Avg	Avg	Avg	Avg	Avg	Avg	Avg
Oct-16	1.10	0.14	0.40	12.90	13.20	45.00	7.00
Nov-16	1.10	0.13	0.50	13.60	13.60	45.30	7.00
Dec-16	1.39	0.15	0.48	13.53	11.97	57.13	7.07
Jan-17	1.10	0.12	0.50	12.70	13.60	43.20	7.30
Feb-17	1.12	0.12	0.50	12.60	13.90	40.70	7.30
Mar-17	1.20	0.12	0.50	12.40	13.70	41.10	7.30
Consented Limit	5.00	0.35	0.50	20.00	15.00	125.00	6.5 -8

	EFFLUEN	NT MONITORING STATIO	N OUTLET B	53.
MONTH	рН	TSS (mg/L)	OIL & GREASE (mg/L)	BOD (mg/L)
	Avg	Avg	Avg	Avg
Oct-16	7.30	8.00	0.70	7.00
Nov-16	7.02	8.50	0.35	4.50
Dec-16	7.46	9.40	0.30	3.20
Jan-17	7.40	8.30	0.20	5.13
Feb-17	7.70	7.50	0.16	5.88
Mar-17	7.60	10.00	0.10	4.50
Consented Limit	6.5 -8	100	10	30

CORPORATE RESPONSIBILITY FOR ENVIRONMENTAL PROTECTION (CREP)

PROGRESS REPORT ON ACTION POINTS

SI. No.	Task	Remarks/Status
1	All the refineries provide on line emission and effluent monitoring systems and give linkages to SPCB and CPCB server and detailed note shall be submitted by individual refineries indicating number of sensors, make and type etc.	22 operational stacks are connected to CPCB to monitor SO ₂ , NOx, CO and PM. All the operational furnace/boiler stacks having more than 10 million kilocalorie/hour (14 numbers) are connected to CPCB with SO ₂ , NOx, CO and PM analisers.
2	The refineries shall submit action plan to achieve zero discharge (except once through cooling water in coastal region) within three months.	Zero discharge was proposed for the refinery during the present expansion project IREP. But, due to the non feasibility of the said recommendation owing to the high volumes of liquid that are required to be evaporated for achieving zero discharge; it will become a highly energy intensive proposal causing heavy green house gas emissions. Hence the above proposal was dropped. MoEF clearance was accorded for the project on the condition that as such the project shall be "zero discharge" and the effluent generation from the entire refinery shall be limited to the present level.
3	The SHE department of refineries shall co-ordinate with marketing divisions for submission of note on evaporation during loading, leakage possibilities, steps taken for fire safety, management of oily sludge	HSE Department became functional. Decision on the same awaited.
4	The refineries who have not completed the task of providing low NOx burners shall complete within six month and submit completion note without further delay.	All the new burners that came up with CEMP phase-II have been provided with low NOx burners. The left out low duty heaters (2 Nos) are expecting a revamp during the next project and one boiler burner replacement is planned in the current budget.

CORPORATE RESPONSIBILITY FOR ENVIRONMENTAL PROTECTION (CREP)

Status as on 31st March 2017

	tatus as on 31 st March 2017	
1.	Air Pollution Management	
a)	All the Refineries located in the critically polluted areas, identified by CPCB, will submit an action plan for phase wise reduction of SO ₂ emission from the present level:	BPCL Kochi Refinery comes under severely polluted cluster. KR meets its total SO ₂ norm of 1607 kg/hr from the complex. It contributes to net reduction in SO ₂ emission by producing Euro- III and Euro – IV MS and Diesel. Following steps are taken to reduce SO ₂ emissions from the refinery. • Modifications to plant fuel system to facilitate usage of low sulphur Bombay High Vacuum Residue as liquid fuel. • Amine treatment of fuel gas • Sulphur Recovery Units with more than 99% recovery.
		 Low Pressure Amine treatment of vacuum column vent.
b)	Future Refineries will have sulphur recovery with minimum 99% efficiency	SRUs have more than 99% efficiency
c)	Road map to improve the efficiency of SRU:	SRUs have more than 99% efficiency hence Not applicable.
d)	With regard to NOx emission, the new Refineries / process units will install low NOx burners. For retrofitting of low NOx burners in existing units the same expert committee will suggest the strategies and action plan within six months:	The expert committee, during their visit to Kochi Refinery, had suggested replacing the burners in heaters with more than 10 million Kcal/hr duty with low NOx type burners. We have installed low NOx burners for ten heaters in the existing Refinery. Moreover, all the new process heaters and steam boiler(total six numbers) installed as part of capacity expansion cum modernisation project, CEMP - Phase II, have been provided with low NOx burners.
е)	The Expert Committee will also suggest an action plan, within 6 months, for control and monitoring of hydrocarbon loss and VOC emissions, leak detection and repair (LDAR) programme and vapour recovery systems (for loading and unloading operations within Refineries only):	a) Mechanical seals for pumps b) Submerged filling in product loading gantries c) Closed blow down system for the process plants. d) Floating roof tanks for volatile product storage. e) Conversion of floating roof tanks to double seal

		hydrocarbon detectors and 62 numbers of hydrogen sulphide detectors are installed at different locations of refinery including product loading, storage tank farms, process plants etc. I) Benzene monitoring using "Drager" chip in the Aromatic Recovery Unit m) Five numbers of online ambient air quality monitoring stations (AAQMS)
f)	The flare losses to be minimized and monitored regularly	Flare losses are monitored continuously through flare meters installed in the process units on a daily basis and are reviewed at the senior management level Further, the fuel gas flow to the pilot burner is maintained at the minimum level required to sustain the pilot flame. Various process schemes implemented to reduce flaring. Advanced process control (APC) system was implemented in hydrogen network for decreasing hydrogen flaring.
g)	Refineries will install continuous emission monitoring systems for SO ₂ and NOx in major stacks. Action plan for this will be submitted within six months	Kochi Refinery has provided continuous SO ₂ and NOx analyzing system for all the heater/boiler stacks above 10 million.
h)	Refineries will also monitor total HC and Benzene in the premises (particularly in loading / unloading operations and ETP). The status and action plan will be submitted within six months	Twenty nine hydrocarbon detectors are installed in the truck loading/wagon loading areas, while thirteen numbers are installed in the LPG bottling plant. Benzene monitoring is carried out using "Drager" chip technique in the Aromatic Recovery Unit on a daily basis. Five online ambient air quality monitoring stations (AAQMS) are installed
2.	Waste Water Management:	(VI IQNIO) are motalied
a)	Refineries will prepare an action plan for conservation of water resources and maximizing reuses / recycles of treated effluent within six months. The treated effluent discharge quantity will be limited to 0.4 m3/tonne (for 90% of time) except for the monsoon season:	The discharge of treated water from Kochi Refinery is 0.19 m³ / tonne of crude processed for the year half year Oct 2016 – Mar 2017. Steam condensate in process plants is being recycled back to the boilers as feed water for steam generation. Approximately 200-250 Kl/hr steam condensate is being recycled to steam boilers in the refinery. Stripped water recycled for desalting process in crude units at the rate 70 -100 Kl per hour. Treated effluent is used for firefighting purposes, process area cleaning and for watering of plants and trees inside refinery and colony premises. Installed four rainwater harvesting schemes with a view to conserve water resources. Two numbers roof top rain water harvesting schemes for make up to CW
13		Two numbers rain water harvesting ponds have been constructed at ACTP and Shore tank farm areas to collect the surface run-off water.

b) Oil spill response facilities at Coastal Refineries will be in position within two years:

Oil spill response (OSR) facility at Cochin Port Trust (CPT) is already in place. Additionally, BPCL Kochi refinery has procured oil containment booms as a part of Single Point Mooring (SPM) facilities to augment the capabilities of oil spill response related facilities. We also conduct mock drills to build confidence for the safe operations of SPM facilities with the help of Port Trust / Coast Guard personnel.

3. Solid Waste Management: Refineries will explore new technologies for reduction in the generation of oily sludge. Strategy and action plan for liquidation of existing sludge will be submitted within six months.

To reduce the sludge generation, Kochi Refinery follows the following best practices:

- Switching of service of storage tanks between different crude oils (high wax and low wax) ensures minimum formation of sludge at the bottom of storage tanks.
- Use of side entry mixers in crude oil tanks.
- Kochi Refinery has engaged M/s SB Industries to process the oily sludge in the Refinery. The oil
 recovery process consists of a series of physical separation processes. Removal of free water is
 achieved through settling. The sediments are removed through screening followed by centrifuging.
 The oil recovered is reused.

4. Refineries will carry out monitoring and survey to assess HC loss and concentration of VOC in Ambient Air / Waste Water Treatment Plant.

- a. BPCL Kochi Refinery has implemented Leak Detection and Repair (LDAR) program using portable hydrocarbon detector instrument.
- b. Secondary seals have been provided in 53 storage tanks storing volatile hydrocarbons.
- c. Hydrocarbon detectors at the storage tank farm areas, process plants, product loading areas.
- d. Benzene monitoring is carried out using "Dragger" chip technique in the Aromatic Recovery Unit on a daily basis.
- e. Five online ambient air quality monitoring stations (AAQMS).
- f. Pressure relief valves for columns and vessel are routed to flare to avoid fugitive emission during emergencies.

5. Refineries will assess the quantity of flare gas (install the measurement system if the same is not possible)

Flare losses are monitored continuously through flare meters installed in the process units on a daily basis and are reviewed at the senior management level.

Further, the fuel gas flow to the pilot burner is maintained at the minimum level required to sustain the pilot flame.

6. Assessment of Potential leakages from petroleum storage tanks

Inspection of petroleum storage tanks is being carried out by following API 653 standard, OISD standard 129 and other relevant standards. Maintenance work is carried out as per the standard procedure when tank is taken for the outage.

Sixty bore wells and 14 piezometer wells are provided and are regularly monitored.

7. Cleaner Technology options and information to be provided to CPCB

a) Clean technologies adopted to combat Air Pollution includes:

- I. Capable for production of MS and HSD of Euro III/Euro IV equivalent quality is currently in continuous operation.
- II. Hydro desulphurisation of feed stock to the fluid catalytic cracking unit (FCCU).
- III. Modifications to plant fuel system to facilitate usage of low sulphur Bombay High Vacuum Residue as liquid fuel.
- IV. Amine treatment of fuel gas for removal of hydrogen sulphide, thereby producing sweet fuel

gas.

- V. Installation of three trains of Sulphur Recovery Unit with more than 99% recovery.
- VI. Low pressure amine treatment of vacuum column vent gas. The uniqueness of the technology lies in the fact that the process for hydrogen sulphide removal is carried out under extremely low pressure drop conditions.
- VII. Desulphurization of low pressure gas from crude unit overhead and kerosene unit fractionator utilizing amine absorption.
- VIII. Reduction furnace in SRUs for conversion of ammonia stream to nitrogen in order to reduce NOx emissions.
- IX. In place of the traditional bitumen blowing unit for bitumen production, state of the art Biturox Technology has been adopted for production of various grades of Bitumen. Unlike the traditional bitumen blowing technology, the new technology results in no odour or pollutant emissions, since the offgas generated is subjected to incineration and caustic scrubbing. The waste water stream generated is also oxidized, thereby resulting in zero BOD in effluent. The fresh water consumption of the unit is also significantly reduced compared to the old unit.
- X. Five online ambient air quality monitoring stations in operation.
- XI. An electrostatic precipitator has been installed downstream of CO Boiler for minimizing particulate matter emission from FCCU regenerator flue gases.
- XII. Closed loop sampling system in process plants.

b) Clean technologies adopted to improve effluent water quality:

- I. Four effluent treatment plants catering to the different process units.
- Installations of four numbers of sour water strippers and recycle of stripped water in process units.
- III. Provision of two stage API Oil Separation System for effluent streams.
- IV. Spent caustic treatment utilizing hydrogen peroxide in an environment friendly process.
- V. Closed drainage system for tank farm drains.
- VI. Two stage biological treatment system for effluent streams including tricking filter and activated sludge process.
- VII. Hydrogen Peroxide is utilized in our ETP's instead of FeCl₃ to avoid chemical sludge formation.
- VIII. Chemical de-contamination technique is being adopted at BPCL KR during turnarounds. The vessels, columns etc are decontaminated using specially formulated chemical which is environment friendly, non hazardous and fully biodegradable. The hydrocarbons are recovered in the form of slop after de-emulsification process.

c) Clean technologies implemented for optimal solid waste management:

- I. Mechanical oil recovery system for oil recovery from oily sludge.
- In-situ recovery of oil from crude tank bottom sludge.
- III. BPCL Kochi Refinery constructed two secured landfills for the safe disposal of hazardous solid wastes as per the standard norms laid down by CPCB. The first landfill pit has a capacity of 590 m³ and is dedicated to the disposal of FCC catalyst fines and spent molecular sieves. The second land fill pit with a capacity of 390 m³ is dedicated for the disposal of sludge from effluent treatment plants.
- IV. Installation of bio gas plant of capacity 1 T/day to convert canteen food waste into gas for use in canteen. The plant is developed based on the NISARGRUNA technology developed by Bhabha Atomic Research Centre.

- V. We have entered into an agreement with KEIL for disposing solid hazardous wastes in their facility.
- VI. Wherever possible, spent catalyst containing recoverable metals are disposed of by sale to authorized recyclers.

7.9 .

General Details

Land Utilisation

Total refinery land area is 1269 acres which comprises plant units, buildings, roads, green belt etc.

Ground water usage

The Refinery depends entirely on Periyar River for its water requirement and no ground water is tapped for any of the purposes.

Green Belt

A fully fledged greenbelt is developed and maintained in the refinery premises. The planting of trees as per new project clearance issued vide letter J-11011/341/2011-IA II (I), dtd 22nd November, 2012 has been completed. Additional acquisition of 168 acres of land for maintenance of green belt is in progress.

Solid waste Management

Oily sludge: Oily sludge is subjected to mechanical oil recovery and the recovered oil is blended with products and the left over solids are disposed off in secured landfill/ Bio remediated. Once the Coker comes along with the new project IREP, oily sludge will be co-processed in the Coker.

ETP Chemical sludge: Chemical sludge from Effluent Treatment plant is temporarily stored in concrete pit. This is finally disposed off in secured landfill

FCCU Catalyst fines: FCCU catalyst fines are stored temporarily in closed steel chamber. These catalyst fines are finally disposed off in secured landfill.

Spent molecular sieves: Spent molecular sieves are stored in steel drums and kept in a covered area. These spent molecular sieves are finally disposed off in secured landfill.

Reformer/Hydrogen/DHDS/NHDS/KHDS spent catalyst: Disposal of this is either in secured landfill or by sale to authorized recyclers.

Catalyst from CEMP Process: Disposal of this is either in secured landfill or sent back to original supplier for reprocessing.

Rainwater Harvesting

Refinery maintains 175000 KL capacity rainwater harvesting pond for ground water rejuvenation. Rain water from about 5000 m² rooftop is tapped for CW make up. Open water quarries also cater for harvesting of rain water.

Solar power

BPCL KR has installed a solar power system of 15 kWp. Also it has installed solar power for decentralised Security cabins. Recently BPCL KR has installed an additional solar power system of 60 kWp on the roof top of CDU II Substation.

Energy management Cell

BPCL KR have a full fledged Environment wing headed by Chief Manager (Environment), directly reporting to General Manager (HSE)

Contact Persons:

Sainath C, Chief Manager (Environment),

Mail: sainathc@bharatpetroleum.in

Phone:0484-2822026

Anoop C Viswam, Manager (E&E),

Mail: anoopcviswam@bharatpetroleum.in

Phone:0484-2821347

भारत सरकार का उपक्रम **कोच्चि रिफ़ाइनरी**



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise Kochi Refinery

03/E&E/202/04 23.06.2017

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

Dear Sir,

Sub: Submission of Half yearly compliance report of IREP Project on Environmental Clearance issued by the Ministry of Environment, Forests and Climate Change.

Ref: 1. Letter from MoEF&CC EP/12.1/2012-13/4/KERALA/4279 dt. 21.10.2013.

 EC Nos.J-11011/32/1990-IA-II dt. 20.8.91;J-11011/78/1996-IA.II dated 05.03.1997; J-11011/238/2008-IA.II dated 18.02.2009 issued to the "IREP Project of M/s Bharat Petroleum Corporation Ltd, Kochi at Ambalamugal".

With reference to the above mentioned letter (Ref.1) from MoEF&CC, regarding the compliance report of the EC clearances referred (Ref.2).

Please find enclosed the compliance reports on the various conditions laid down by MoEF &CC, pertaining to the half year period from October 1st, 2016 to March 31st, 2017 for the subject project.

Thanking you

Very truly yours

For BPOL Kochi Refinery

Damien Gracious

General Manager (HSE)

Encl: 1.Status compliance Report

Cc:

- 1. The Member Secretary Central Pollution Control Board Parivesh Bhawan East Arjun Nagar Delhi - 110 032
- 2. The Member Secretary
 Kerala State Pollution Control Board
 Plamoodu Junction
 Pattom Palace
 Thiruvananthapuram 695 004

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stacks shall be carried out. Stacks as required. The process emissions [SO ₂ NOx, HC (Methane & Non-methane)] The process emissions [SO ₂ NOx, VOCs and Benzene from various units shall conform prescribed under the Environment (Protection) Act. At no time, the Benzene from various units shall conform	.≥	Continuous on-line stack monitoring for SO2, NOx and CO of all the	Continuous on-line analyzers for monitoring
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The process emissions [SO ₂ NOx, HC (Methane & Non-methane)] The process emissions [SO ₂ NOx, VOCs and Benzene from various units shall conform to the standards (Methane & Non-methane)] VOCs prescribed under the Environment (Protection) Act. At no time, the Benzene from various units shall conform			
(Methane & Benzene from	>	The process emissions [SO2 NOx, HC (Methane & Non-methane)]	emissions [SO ₂ NOx,
Denzene Iron		VOCs and Benzene from various units shall conform to the standards	
		prescribed under the Environment (Protection) Act. At no time, the	

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11011/341/201	COMMENTS	Compliance Status
1-IA II (I), Dtd.: 22/11/12		
	emission levels shall go beyond the stipulated standards.	the standards prescribed under the
	In the event of failure of poliution control system(s) adopted by the	Environment (Protection) Act.
	unit, the unit shall be immediately put out of operation and shall not	Being complied for the units commissioned.
	be restarted until the desired efficiency of the pollution control device	
·i>	Leak detection and repair programme shall be prepared and	Leak detection and repair programme will be
	implemented to control HC/VOC emissions. Focus shall be given to	prepared and implemented to control HC/VOC
	prevent fugitive emissions for which preventive maintenance of	<u>R</u>
	pumps, valves, pipelines are required. Proper maintenance of	to. Sensors 1
	ഗ	detecting HC leakage will be installed at
	maintenance schedule for each unit shall be prepared and adhered	suitable locations.
	to. Fugitive emissions of HC from product storage tank yards etc.	
	must be regularly monitored. Sensors for detecting HC leakage shall	
	be provided at strategic locations.	
iiv	SO ₂ emissions after expansion from the plant shall not exceed 1582	The total SO2 emission after expansion will not
	kg/hr and further efforts shall be made for reduction of SO ₂ load	exceed 1518 Kg/hr Low Sulphur FO will be
	through use of low sulphur fuel. Sulphur recovery units shall be	used. Sulphur Recovery Unit with Tail Gas
	installed for control of H2S emissions. The overall sulphur recovery	Treatment unit with overall Sulphur recovery
	efficiency of Sulphur Recovery Unit with tail gas treating shall not be	efficiency of 99.9% shall be put up.
	less than 99.9%.	
	(The SO2 emission was reduced from 1582 Kg/Hr to 1518 based on	Being complied.
	the EC amendment dated 23.05.2014).	
iiiv	As proposed, record of Sulphur balance shall be maintained at the	Sulphur balance record shall be maintained.
	Refinery as part of the environmental data on regular basis. The basic	
	component of sulphur balance include sulphur input through feed	
	(sulphur content in crude oil), sulphur output from Refinery through	
	products, byproduct (elemental sulphur), atmospheric emissions etc.	
.≥	Flare das recovery system shall be installed.	BPCL-KR has sent a formal request to MoE&F

Report on the status of Compliance of scipulated Environmental Conditions - IREP Project BrCL-KR - Period October 1 to March 31.

Env.Ltr.No. J- 11011/341/201 1-IA II (I), Dtd.:		
11011/341/201 1-IA II (I), Dtd.:		
1-IA II (I), Dtd.:	COMMENTS	Compliance Status
22/11/12		
i i x	Total water requirement from River Periyar after expansion shall not	The total raw water intake post IREP shall not exceed 3083.3 m³/hr. The treated effluent shall
D O	competent authority.	be discharged into chitrapuzha river after
		conforming to the standards and the discharge
<u> </u>	Industrial effluent generation will be 1400 m ³ /hr and treated in the	quantity shall not exceed 410 m³/hr.
ט אַ	within the factory premises and remaining treated effluent shall be	
0	discharged into Chitrapuzha River after conforming to the standards	
Ω	prescribed for the effluent discharge and obtaining permission from	
=	the KSPCB, which shall not exceed 410 m3/hr. Domestic sewage	
S	shall be treated in sewage treatment plant (STP).	potentiano od llede base basis sterence A
xiv	All the effluents after treatment shall be routed to a properly line	A separate guard porid snail be constitucted
D	guard pond for equalization and final control. In the guard pond,	with automatic Monitoring system for flow rate,
- CO	automatic monitoring system for flow rate, pri and IOC shall be	pH and TOC.
<u>Q</u>	provided.	
×	Oil catchers/oil traps shall be provided at all possible locations in	Oil catchers/oil traps at possible locations shall
	rain/storm water drainage system inside the factory premises.	be provided.
ivx	A study shall be conducted to identify the source of odour and	As per the EC condition, a separate study was
2		the root was submitted to MoEE regional
21	report shall be submitted to the Ministry's Regional Unice at	office Bandalore
	Bangalore within 6 months from the date of issue of this letter.	All the accumulated oily sludge has been
II/X	Improvement in the sludge lightning area is required and submitted to the	
	Ministry's Regional office at Bandalore.	the oily sludge being gene
		processed batch-wise by an external
		contractor. Final sludge disposal scheme has

S.No. as per Env.Ltr.No. J-		
11011/341/201	COMMENTS	Compliance Status
1-IA II (I), Dtd.: 22/11/12		
		been submitted already.
iiiv	Oily sludge shall be disposed off into Coker. Annual Oily sludge generation and disposal data shall be submitted to the Ministry's Regional Office and CPCB.	As a part of IREP project, a Delayed Coker Unit (DCU) is being set up. Post IREP, provision shall be made for processing tank bottom sludge and oily sludge in the DCU in a controlled rate as per the scheme mentioned above. With this we hope that there will be no accumulation of oily sludge in future.
XiX	The Company should strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October, 1994 and January, 2000. Hazardous waste should be disposed of as per Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2008 and amended time to time.	Will be complied.
×	The membership of common TSDF should be obtained for the disposal of hazardous waste. Copy of authorization or membership of TSDF should be submitted to Ministry's Regional Office at Bangalore. Chemical/inorganic sludge shall be sent to treatment storage disposal facility (TSDF) for hazardous waste. Spent catalyst shall be sent to authorized recyclers/re-processors.	BPCL-KR has entered into a waste disposal agreement with M/s Kerala Enviro Infrastructure Limited to dispose off all wastes including hazardous waste. Spent catalyst is being sent to authorized recyclers/reprocessors / disposal agencies.
××	Proper oil spillage prevention management plan shall be prepared to avoid spillage/leakage of oil/petroleum products and ensure regular monitoring.	BPCL-KR is having an oil spillage contingency plan for SBM. Inside the refinery complex, adequate facilities are maintained to prevent and contain oil spillage.
iixx	The company shall strictly follow all the recommendation mentioned in the Charter on Corporate Responsibility for Environmental	Will be complied.

Report on the status of Compliance or scipulated Environmental Conditions - IREP Project and Land - Period October 1 to March 31.

S.No. as per Env.Ltr.No. J- 11011/341/201 1-IA II (I), Dtd.: 22/11/12	COMMENTS	Compliance Status
	protection (CREP).	
iiixx	To prevent fire and explosion at oil and gas facility, potential ignition sources shall be kept to a minimum and adequate separation distance between potential ignition sources and flammable materials shall be in place.	Safety distances as per OISD guidelines have been kept.
xxiv	Green belt shall be developed at least in 33% of the plant area in and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Thick green belt with suitable plant species shall be developed around unit. Selection of plant species shall be as per the CPCB guidelines.	
^XX	Company shall prepare project specific environmental manual and a copy shall be made available at the project site for the compliance.	As per the EC condition a project specific Environmental Manual has been prepared and the same is made available at the project site for the compliance.
xxvi	All the recommendations mentioned in the rapid risk assessment report, disaster management plan and safety guidelines shall be implemented.	BPCL-KR has taken care of the RRA recommendations in the design stage itself. Complied.
XXVII	All the issues raised and commitment made during the public hearing/consultation meeting held on 14th February 2012	BPCL-KR will address the concerns raised by the public during public hearing wherever it is feasible and applicable.
xxviii	Company shall adopt Corporate Environment Policy as per the Ministry's O.M. No. J-11013/41/2006-IA.II(I) dated 26th April, 2011 and implemented.	BPCL as a Corporation is having a Corporate HSSE Policy which includes Environment also.
xix	made for the housing of construction lecessary infrastructure and facilities suc	Being complied.
	9	

Report on the status of Compliance of stipulated Environmental Conditions - IREP Project arCL-KR - Period October 1 to March 31.

S.No. as per Env.Ltr.No. J-	STNAMPOL	Compliance Status
1-IA II (I), Dtd.: 22/11/12		
	fledged laboratory facilities must be set up to carry out the environmental management and monitoring functions.	Management cell to carry out environmental management and monitoring functions. We have well equipped Centralised Quality Control Laboratory.
·>	Adequate funds shall be earmarked towards capital cost and recurring cost/annum for environment pollution control measures and shall be used to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes.	BPCL-KR has earmarked adequate funds for environment pollution control measures.
ij		Six monthly compliance reports are being submitted on 1st June (for the period 1st Oct to 31st March) and on 1st December (for the period 1st April to 30th September) by BPCL-KR
ijŢ	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the Company by the proponent.	s complied with this condition
. <u>×</u>	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; PM10, PM2.5, SO2, NOx, HC (Methane of Non-methane), VOCs (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects	Six monthly compliance reports are being submitted on 1st June (for the period 1st Oct to 31st March) and on 1st December (for the period 1st April to 30th September) by BPCL-KR after receipt of the Environmental Clearance for the IREP project. The same will be sent to the Regional Office of MoEF and also uploaded in the website.

Report on the status of Compliance or stipulated Environmental Conditions - IREP Project BPCL-KR - Period October 1 to March 31.

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise Kashi Refinence

Kochi Refinery

The data on emission, ambient air, effluent, CREP recommendations, details of land balance, Ground water usage, Green Belt, Solid waste Management, Rain water Harvesting, Solar Power generation and details of Environment Management Cell being common to all the ECs granted in the Kochi refinery premises, the same are enclosed as part of latest issued EC for CEMP-II accorded vide MoEF&CC letter J-11011/369/2005-IA II(I) dated 2nd February 2006.

Thanking you

Very truly yours

For BPCL Kochi Refinery

Damien Gracious

General Manager (HSE)

Encl: 1.Status compliance Report

Cc:

1. The Member Secretary Central Pollution Control Board Parivesh Bhawan East Arjun Nagar Delhi - 110 032 2. The Member Secretary
Kerala State Pollution Control Board
Plamoodu Junction
Pattom Palace
Thiruvananthapuram - 695 004

COMPLIANCE STATUS OF ENVIRONMENTAL CLEARANCE CONDITIONS FOR CAPACITY EXPANSION PROJECT ACCORDED BY J-11011/32/90-IA.II DTD.20/08/1991

Status of the project: Project commissioned in 1994

SI. No.	Stipulations of MoEF & CC	Status as on 31.03.2017
1	The project authorities must strictly adhere to the stipulations laid down by the State Pollution Control Board and the State Government and a comprehensive EIA report must be submitted within two months.	Complied. EIA report was submitted in October 1991.
2	Any expansion of the plant, either with the existing product mix or new products can be taken up only with the prior approval of this Ministry.	Complied.
3	The present policy of crude mix refining strategy of minimum 50% Indian crude including B.H and 50% of imported crude should be maintained and implemented under normal conditions.	Crude mix is chosen to improve the gross refining margin of the refinery within the consented conditions of production and emission/effluent norms.
4	Sulphur Recovery Unit with more than 90% Sulphur recovery should be installed and commissioned before the expansion project is completed and precautions for its continuous operation must be taken. Techno-economic feasibility study for additional stand -by 'S' recovery system may be initiated after the installation of first unit.	Sulphur Recovery Unit with more than 90% sulphur recovery commissioned during March 1995. Standby Sulphur Recovery have been implemented as part of DHDS project.
5	Only LSHS should be used in boilers. The additional capacity for heaters, utility furnace must be based on LSHS use only. Low NOx burners should be used to avoid gaseous formation of NOx.	Complied.
6	The gaseous emissions from various process units should conform to the standards prescribed by the concerned authorities from time to time. At no time the emission level should go beyond the stipulated standards. In the event of the failure of any pollution control system adopted by the unit, the respective unit should be put out of operation immediately and should not be restarted until the control measures are rectified to achieve the desired efficiency.	Complied.

7	Adequate number (a minimum of 7) of air quality monitoring stations should be set up in the down-wind direction as well as where maximum ground level concentration is anticipated. Stack emission should be monitoring by monitoring unit. The data on stack emission should be submitted to the State Pollution Control Board once in three months and to this Ministry once in six months along with the statistical analysis. The air quality monitoring stations should be selected on the basis of modelling exercise to represent the short term ground level construction.	As per letter No. J-11011/32/90-IA. II dated 19.05.1992. CRL was directed to put up 4 Nos. of AAQMS. Based on wind rose pattern at CRL and modelling exercise conducted, 3 AAQMS were found to be sufficient for monitoring the pollutants from CRL. KSPCB's approval was obtained to put up these 3 stations in CRL premises. 3 Nos. of AAQMS had been installed along with a Data Acquisition Centre and was commissioned in August 1997. Post CEMP- II project, commissioned in 2010 – 2011, BPCL KR has 5 AAQMS stations and 3 high volume samplers. The data from all the five AAQMS stations are being uploaded to CPCB servers. The data from AAQMS are being provided along with CEMP II clearance accorded vide MoEF&CC letter J-11011/369/2005-IA II(I) dated 2 nd February 2006 to KSPCB and MoEF&CC as per the recommended time interval.
8	Fugitive emissions should be regularly monitored and adequate provision should be made for the same.	Complied.
9	Fugitive emission of HC from storage tanks should be minimized by adopting the following measures: a) Provision of Floating Roof Tanks for volatile products b) Replacement of gland packing of pumps by means of mechanical seals. c) Use of submerged filling in product loading gantries	Complied. All the pumps except pumps in heavy oil or water service are provided with mechanical seals. Complied.
10	There should be no change in the stack design without the approval of the State Pollution Control Board. Alternate Pollution Control System and proper design in the stack should be provided to take care of excess emissions due to failure in any system of the plant.	Complied
11	Total raw water consumption (industrial as well as township) should not exceed the present level (i.e.16,800 m3/day)	Complied.
12	The project authorities must recycle waste water to the maximum extent possible. The present practice of ETP effluent discharged into water logged areas should not be continued.	Complied.

. The second sec	The liquid effluent coming out of the plant should meet the stipulated standards and disposed through the channel only into the outfall point in Chitrapuzha river to be identified by the State Pollution Control Board. Flow of oil and grease into biological system should be avoided.	
Ē	Waste stream segregator should be installed before ETP.	
13	Adequate number of effluent quality (oil & grease, COD, BOD, Suspended solids, phenols, sulphides, pH and flow) monitoring stations must be set up in consultation with State Pollution Control Board	On line treated effluent analyzer installed in consultation with State Pollution Control Board.
14	No oily sludge should be generated and stored as was being done in the past.	The generation of oily sludge is minimized by switching over of services of tanks in BH crude and imported crude oil service and by extraction of oil from the sludge. Sludge generated is processed continuously.
15	The project authority should prepare a well designed scheme for solid and hazardous wastes disposal generated from CRL, taking into account the suggestions made by consultants in the EIA report. The plan for disposal duly approved from the State Pollution Control Board should be submitted to the Ministry within six months and adequate space should be provided for it, as far as possible on the premises itself.	Scheme for solid and hazardous waste disposal was approved by KSPCB. Scheme was subsequently submitted to MoE&F in March 1993. BPCL Kochi Refinery has implemented a scheme for recovery of oil from oily sludge. The oil recovery process consists of a series of physical separation processes. The oil recovered is reprocessed in the refinery process units. Bio remediation is carried out through TERI
		Spent catalyst is disposed by either returning to the original supplier or selling to the recycler or is disposed in secured land fill.
		ETP Chemical sludge is disposed in secured landfill.
		Bio sludge from effluent treatment plant is used as manure.
16	Green belt, 500 meters wide, as recommended by the consultants in their report should be developed and maintained. The treated effluent conforming to the standard should be used for green belt development plan taking into account attenuation factors, soil characteristics etc. should be prepared and submitted to this Ministry within 6 months.	Complied.

	17	Relocate LPG spheres so that risk due to these remains within the plant area	As it was not feasible to relocate the LPG spheres, it had been desired by MoE&F to acquire land in the adjoining area where impact will be more. Accordingly, the adjoining land of 63 acres had been acquired by CRL that has been occupied by IOC, HPC and BPC area.
			Further, LPG spheres are progressively being replaced with mounded storages.
	18	A detailed risk analysis study based on Maximum Credible Accident Analysis should be done and submitted to this Ministry once the process design / technology and lay out is frozen. Based on this, a Disaster Management Plan has to be prepared and after approval by the concerned Nodal Agency, should be submitted to this Ministry within six months.	Risk analysis study had been conducted and was submitted to MoEF &CC in October 1991. Disaster Management Plan was submitted to MoEF &CC in February 1992.
	19	Feasibility of using 20 tonner truck may be studied / assessed wherever road transport is being envisaged and report submitted to this Ministry in three months.	20 Tonner trucks were not viable and this was informed to MoEF &CC.
	20	The project authority must set up laboratory facilities for collection and analysis of samples under the supervision of competent technical personnel, who will directly report to the Chief Executive.	Complied
	21	A Separate Environmental Management Cell with suitably qualified people to carry out various functions should be set up under the control of Senior Executive, who will report directly to the Head of the organization.	Already exists.
)	22	The funds earmarked for the environmental protection measures should not be diverted for other purposes and year-wise expenditure should be reported this Ministry.	Complied with. An estimated amount of Rs.74/- crores have been spent during implementation of Capacity Expansion Project towards environmental protection measures.

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise Kochi Refinery

03/E&E/202/04 27.06.2017

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

Dear Sir,

Sub: Submission of Half yearly compliance report – Environmental Clearance issued by the Ministry of Environment, Forests and Climate Change

Ref: 1. EP/12.1/95/KER dt. 1st July 2016,

 EC No.J-16011/38/2003-IA-III 12.8.2004 issued to the project "Development of crude oil Receipt facilities (CORE), Facilities include Single point Mooring, Submarine Pipe line from SPM to Shore Tank Farm, STF and Pipe line from STF to KRL for M/s Bharat Petroleum Corporation Ltd, Kochi Refinery (Formerly Kochi Refinery)"

With reference to the above mentioned letter (Ref.1) from MoEF&CC, regarding the compliance report of the EC clearances referred (Ref.2), we would like to appraise the following points.

- 1. The project has been commissioned in 2006.
- The crude oil receipt facilities are for receiving crude at Single point mooring facility and transporting the crude oil to refinery storage tanks. This facility does not have any other operation other than transport of crude oil into refinery tanks. Hence there is no continuous emission/effluent generation from this facility.

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise

Kochi Refinery

Please find enclosed the compliance reports on the various conditions laid down by MoEF &CC, pertaining to the half year period from October 1^{st,} 2016 to March 31st, 2017 for the Project mentioned in the Ref. 2 above. The data on ambient and storm water details for the above said period are given as Annexure-I.

The Details of Land Balance, Ground water usage, Green Belt, Solid waste Management, Rain water Harvesting and details of Environment Management Cell, are attached as Annexure-II.

Thanking you,

Very truly yours

For BPCL Kochi Refinery

Damien Gracious General Manager (HSE)

Encl: 1.Status compliance Report

2. Annexure -1: Ambient Air Details

3. Annexure -2: Quality of Storm water

4. Annexure -3: General details

Cc:

1. The Member Secretary Central Pollution Control Board Parivesh Bhawan East Arjun Nagar Delhi - 110 032 2. The Member Secretary
Kerala State Pollution Control Board
Plamoodu Junction
Pattom Palace
Thiruvananthapuram - 695 004

COMPLIANCE STATUS OF ENVIRONMENTAL CLEARANCE CONDITIONS FOR CRUDE OIL RECIEPT FACILITIES (CORE), FACILITIES INCLUDE SINGLE POINT MOORING, SUBMARINE PIPE LINE FROM SPM TO SHORE TANK FARM, STF AND PIPE LINE FROM STF TO KRL FOR M/S KOCHI REFINERIES LTD. ACCORDED BY J-16011/38/2003-IA-III DT.12.8,2004

Status of the project: Project commissioned in 2006

SI. No.	Condition	Status/Remarks
(i)	All the conditions stipulated by Kerala Pollution Control Board vide letter No. PCB/CE/EK/595/2003 dated 05.12.03 shall be effectively implemented.	Complied.
(ii)	All the conditions stipulated by Forest & Environment Department, Govt. of Kerala vide their letter No. 65/B1/2004/CZMA dated 31.03.04 shall be effectively implemented. The project shall be implemented in such a manner that no portion of the project site should be located in CRZ-I(i) and no damage is caused to the mangroves or other sensitive coastal eco-systems due to project activities.	Complied.
(iii)	It shall be ensured that there is no displacement of people, houses or fishing activity as a result of the project.	Complied
(iv)	It shall be ensured that due to the project, there is no adverse impact on the drainage of the area and recharge of groundwater. No groundwater should be tapped in the project area falling in Coastal Regulation Zone.	Complied
(v)	The project proponents must make necessary arrangements for disposal of solid wastes and for the treatment of effluents/liquid wastes. It must be ensured that the effluents/liquid wastes are not discharged into the backwater.	Normally there is no liquid effluent generation from the facility. An ETP is set up to handle effluents generated if any. Oily sludge generated in the crude tanks is subjected to oil recovery.

SI. No.	Condition	Status/Remarks
(vi)	The camps of labour shall be kept outside the Coastal Regulation Zone area. Proper arrangements for cooking fuel shall be made for the labour during construction phase so as to ensure that mangroves are not cut /destroyed for this purpose.	Complied during the project construction phase.
(vii)	Regular drills should be conducted to check the effectiveness of the on-site Disaster Management Plan. The recommendations made in the Environmental Management Plan and Disaster Management Plan, as contained in the Environmental Impact Assessment and Risk Analysis reports of the project, shall be effectively implemented and adequate budgetary provisions may be made for the same. Details in this regard may be furnished to this Ministry.	Regular Drills are being conducted. Recommendations of the EIA and Risk analysis reports have been implemented
(viii)	The entire stretch of the pipelines shall be buried underground except at the booster pumping station, which will be properly fenced and the station would be manned round the clock. The buried lines will be protected with anticorrosive coal tar based coating. The coating will be tested by high voltage detector in accordance with prescribed standards.	Pipe lines are laid underground with CTE /3 LP coating. Further, these buried pipe lines are provided Cathodic protection and regular monitoring of the voltage is being done. Crude in transit storage and booster pump facilities are manned round the clock.
(ix)	Markers shall be installed at every 30 m to indicate the position of the line.	Markers are provided.
(x)	The smooth and safe operation of the system will be ensured by incorporating a computerized SCADA (Supervisory Control and Data Acquisition) system.	Computerized control system implemented.
(xi)	There should be display boards at critical locations along the pipeline viz. road/rail/river crossings giving emergency instructions as well as contact details of Kochi Refineries Limited.	Complied
(xii)	During operation phase, proper precautions should be taken to avoid any oil spills and no oily wastes shall be discharged into the water bodies.	

SI. No.	Condition	Status/Remarks
(xiii)	It shall be ensured that the mangroves along with proposed alignment of the pipeline, if any shall not be adversely affected due to the project.	· · · · · · · · · · · · · · · · · · ·
(xvi)	Storage of petroleum products shall be permitted within the provisions of the CRZ Notification, 1991 and its subsequent amendments.	
(xv)	The impact of oceanographic parameters on the sub- sea pipeline such as buckling, slope stability, prediction of marine growth, local bad effects, pipeline spanning, liquefaction, etc. shall be studied.	It was taken care during the pipeline design by M/s. INTEC, Malaysia, based on Geo-technical studies and the subsea pipe lines were laid incorporating all these safe guards.

AMBIENT AIRQUALITY DATA FOR THE HALF YEAR PERIOD OCTOBER 2016 - MARCH 2017

	AMB	IENT AIR Q	UALITY MO	ONITORING	STATION	:	3.
			STF AAQN	1S -1			
MONTH		Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17
COMPONENT	UNIT	Avg	Avg	Avg	Avg	Avg	Avg
PM10	ug/m3	34.2	70	63.2	65.1	68.9	41.9
PM2.5	ug/m3	28.8	61.2	56.2	54	51	31.4
SO2	ug/m3	5.3	5.4	6	3	1.6	2.5
	AMB	IENT AIR Q	UALITY MO	ONITORING	STATION		
			STF AAQN	1S -2			
MONTH		Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17
COMPONENT	UNIT	Avg	Avg	Avg	Avg	Avg	Avg
PM10	ug/m3	48.2	91.7	87	88.3	90	57.5
PM2.5	ug/m3	32.5	70.1	64.3	63	52	36
SO2	ug/m3	3.3	3.8	4.5	2.5	1.9	2.7
	AME	SIENT AIR Q	UALITY M	ONITORING	STATION		
			STF AAQN				
MONTH		Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17
COMPONENT	UNIT	Avg	Avg	Avg	Avg	Avg	Avg
PM10	ug/m3	47.00	81.90	73.80	83.40	82.10	54.30
PM2.5	ug/m3	34.80	70.30	66.30	67.00		37.60
SO2	ug/m3	8.20	10.80	10.30	4.70	4.80	3.90

		LOCITI WO	NITORING STAT		TAILK SII		
MONTH	OIL & GREASE	PHENOL	SULPHIDES	TSS	BOD 3 DAYS AT 27°C	COD	рН
	(mg/l)	(mg/l)	(mg/l)	(mg/l)	(mg/l)	(mg/l)	(mg/l)
	AVG	AVG	AVG	AVG	AVG	AVG	AVG
PERMISSIBLE LIMITS	5	0.35	0.5	20	15	125	6.0-8.5
OCT-16	1.2	0.08	0.5	11	5.7	25	6.9
NOV-16	1.1	0.07	0.5	12	5.3	25	7.1
DEC-16	1.1	0.07	0.5	12	12	24	7.5
JAN-17	1.1	0.08	0.5	- 13	11	. 25	7.2
FEB-17	1	0.13	0.5	15	10	35	7.6
MAR-17	1.3	0.12	0.5	17	13	41	7.3

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise Kochi Refinery

03/E&E/202/04 27.06.2017

The Additional Principal Chief conservator of Forests (C) Ministry of Environment, Forest & Climate Change 4th 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

Ref: 1. Letter from MoEF&CC EP/12.1/70/KER dt. 1st July 2016

 EC No.J-11011/78/96-IA-II dt. 5.3.97 issued to our Project "Installation of Diesel Hydro De-Sulphurisation (DHDS) project M/s Bharat Petroleum Corporation Ltd, Kochi Refinery (Formerly Cochin Refineries Ltd)"

With reference to the above mentioned letter (Ref.1) from MoEF&CC, regarding the compliance report of the EC clearances referred (Ref.2), we would like to submit that the subject project has been commissioned in the year 2000.

Please find enclosed the compliance reports on the various conditions laid down by MoEF &CC, pertaining to the half year period from October 1^{st,} 2016 to March 31^{st,} 2017 for the subject project.

The data sought on emission, ambient air, effluent, CREP recommendations, details of Land utilisation, Ground water usage, Green Belt, Solid waste Management, Rain water Harvesting, Solar Power generation and details of

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED

A Govt. of India Enterprise

Kochi Refinery

Environment Management Cell being common to all the ECs granted in the Kochi refinery premises, the same are enclosed as part of latest issued EC for CEMP-II accorded vide MoEF&CC letter J-11011/369/2005-IA II(I) dated 2nd February 2006.

Thanking you

Very truly yours
For BPCL Kochi Refinery

Damien Gracious

General Manager (HSE)

Encl: 1.Status compliance Report

Cc:

1. The Member Secretary Central Pollution Control Board Parivesh Bhawan East Arjun Nagar Delhi - 110 032 2. The Member Secretary
Kerala State Pollution Control Board
Plamoodu Junction
Pattom Palace
Thiruvananthapuram - 695 004

COMPLIANCE STATUS OF ENVIRONMENTAL CLEARANCE CONDITIONS FOR INSTALLATION OF DIESEL HYDRO. DESULPHURISATION (DHDS) PROJECT ACCORDED BY J-11011/78/96-IA-II DT. 5.3.97

Status of the project: Project commissioned in 2000

ITEM NO.	ITEM DESCRIPTION	STATUS AS ON 31.03.2017
1	All conditions stipulated by MoEF & CC while	Complied
	according approval for Capacity Expansion Project	
2	No expansion or modernization of the Plant should be	Complied.
2	and the second s	Complied.
	carried out without approval of the MoEF&CC	
3	The project authority must strictly adhere to the	Complied
	stipulations laid down by the Kerala State Pollution	
	Control Board and the State Govt.	
4	The total SO ₂ emission from BPCL Kochi Refinery	Complied
	including DHDS Project should not exceed the norm	
	of 1607 Kg./hr. (Refer MoEF&CC vide letter	
	No.J-110/1/78/96.IA.II dated 9 th February,1999)	
5	The existing ETP should be adequately augmented or	New ETP has been
	additional treatment facilities should be provided to	commissioned along with the
	accommodate the additional effluent load from DHDS	DHDS Project.
	project before commissioning the project to ensure	
	that the treated effluent meets the MINAS standard.	
6	Time bound action plan for disposal of oil sludge /	Complied. A scheme for the
	recovery of oil and design details of the solid waste	recovery of oil from
141	disposal pit should be furnished to the Ministry within	accumulated sludge has been
	a period of 3 months.	implemented. All the
		accumulated sludge at that
		point of time was processed
		and currently there is no
		accumulated stock of oily
		sludge.
		A secured landfill facility fo

T. (4. 4.		storing hazardous wastes was commissioned in March, 2005.
7	SRU having an efficiency of more than 99% should be installed.	Complied.
8	The ground water quality should be monitored and the report should be submitted to the Ministry every six months.	Complied

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise Kochi Refinery

03/E&E/202/04 27.06.2017

The Additional Principal Chief conservator of Forests (C)
Ministry of Environment, Forest & Climate Change
4th 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.

Ref: 1. Letter from MoEF&CC EP/12.1/33/KER dated. 1st July 2016

 EC No.J-11011/32/90-IA-II dt. 20.8.91 issued to our Project "Capacity expansion of M/s Bharat Petroleum Corporation Ltd, Kochi Refinery (Formerly Cochin Refineries Ltd.) from 4.5 to 7.5 MMTPA at Ambalamugal".

With reference to the above mentioned letter (Ref.1) from MoEF&CC, regarding the compliance report of the EC clearances referred (Ref.2), we would like to submit that the subject project has been commissioned in the year 2000.

Please find enclosed the compliance reports on the various conditions laid down by MoEF &CC, pertaining to the half year period from October 1^{st,} 2016 to March 31^{st,} 2017 for the subject project.

भारत सरकार का उपक्रम कोच्चि रिफ़ाइनरी



BHARAT PETROLEUM CORPORATION LIMITED A Govt. of India Enterprise

Kochi Refinery

The data on emission, ambient air, effluent, CREP recommendations, details of land balance, Ground water usage, Green Belt, Solid waste Management, Rain water Harvesting, Solar Power generation and details of Environment Management Cell being common to all the ECs granted in the Kochi refinery premises, the same are enclosed as part of latest issued EC for CEMP-II accorded vide MoEF&CC letter J-11011/369/2005-IA II(I) dated 2nd February 2006.

Thanking you

Very truly yours.
For BPCL Kochi Refinery

Damien Gracious

General Manager (HSE)

Encl: 1.Status compliance Report

Cc:

1. The Member Secretary Central Pollution Control Board Parivesh Bhawan East Arjun Nagar Delhi - 110 032 2. The Member Secretary
Kerala State Pollution Control Board
Plamoodu Junction
Pattom Palace
Thiruvananthapuram - 695 004

COMPLIANCE STATUS OF ENVIRONMENTAL CLEARANCE CONDITIONS FOR CAPACITY EXPANSION PROJECT ACCORDED BY J-11011/32/90-IA.II DTD.20/08/1991

Status of the project: Project commissioned in 1994

SI. No.	Stipulations of MoEF & CC	Status as on 31.03.2017
1	The project authorities must strictly adhere to the stipulations laid down by the State Pollution Control Board and the State Government and a comprehensive EIA report must be submitted within two months.	Complied. EIA report was submitted in October 1991.
2	Any expansion of the plant, either with the existing product mix or new products can be taken up only with the prior approval of this Ministry.	Complied.
3	The present policy of crude mix refining strategy of minimum 50% Indian crude including B.H and 50% of imported crude should be maintained and implemented under normal conditions.	Crude mix is chosen to improve the gross refining margin of the refinery within the consented conditions of production and emission/effluent norms.
4	Sulphur Recovery Unit with more than 90% Sulphur recovery should be installed and commissioned before the expansion project is completed and precautions for its continuous operation must be taken. Techno-economic feasibility study for additional stand –by 'S' recovery system may be initiated after the installation of first unit.	Sulphur Recovery Unit with more than 90% sulphur recovery commissioned during March 1995. Standby Sulphur Recovery have beer implemented as part of DHDS project.
5	Only LSHS should be used in boilers. The additional capacity for heaters, utility furnace must be based on LSHS use only. Low NOx burners should be used to avoid gaseous formation of NOx.	Complied.
6	The gaseous emissions from various process units should conform to the standards prescribed by the concerned authorities from time to time. At no time the emission level should go beyond the stipulated standards. In the event of the failure of any pollution control system adopted by the unit, the respective unit should be put out of operation immediately and should not be restarted until the control measures are rectified to achieve the desired efficiency.	Complied.

7	Adequate number (a minimum of 7) of air quality monitoring stations should be set up in the down-wind direction as well as where maximum ground level concentration is anticipated. Stack emission should be monitoring by monitoring unit. The data on stack emission should be submitted to the State Pollution Control Board once in three months and to this Ministry once in six months along with the statistical analysis. The air quality monitoring stations should be selected on the basis of modelling exercise to represent the short term ground level construction.	As per letter No. J-11011/32/90-IA. II dated 19.05.1992. CRL was directed to put up 4 Nos. of AAQMS. Based on wind rose pattern at CRL and modelling exercise conducted, 3 AAQMS were found to be sufficient for monitoring the pollutants from CRL. KSPCB's approval was obtained to put up these 3 stations in CRL premises. 3 Nos. of AAQMS had been installed along with a Data Acquisition Centre and was commissioned in August 1997. Post CEMP- II project, commissioned in 2010 – 2011, BPCL KR has 5 AAQMS stations and 3 high volume samplers. The data from all the five AAQMS stations are being uploaded to CPCB servers. The data from AAQMS are being provided along with CEMP II clearance accorded vide MoEF&CC letter J-11011/369/2005-IA II(I) dated 2 nd February 2006 to KSPCB and MoEF&CC as per the recommended time interval
8	Fugitive emissions should be regularly monitored and adequate provision should be made for the same.	Complied.
9	Fugitive emission of HC from storage tanks should be minimized by adopting the following measures: a) Provision of Floating Roof Tanks for volatile products b) Replacement of gland packing of pumps by means of mechanical seals. c) Use of submerged filling in product loading gantries	Complied. All the pumps except pumps in heavy oil or water service are provided with mechanical seals. Complied.
10	There should be no change in the stack design without the approval of the State Pollution Control Board. Alternate Pollution Control System and proper design in the stack should be provided to take care of excess emissions due to failure in any system of the plant.	Complied
11	Total raw water consumption (industrial as well as township) should not exceed the present level (i.e.16,800 m3/day)	
12	The project authorities must recycle waste water to the maximum extent possible. The present practice of ETP effluent discharged into water logged areas should not be continued.	Complied.

	The liquid effluent coming out of the plant should meet the stipulated standards and disposed through the channel only into the outfall point in Chitrapuzha river to be identified by the State Pollution Control Board. Flow of oil and grease into biological system should be avoided.	
	Waste stream segregator should be installed before ETP.	
13	Adequate number of effluent quality (oil & grease, COD, BOD, Suspended solids, phenols, sulphides, pH and flow) monitoring stations must be set up in consultation with State Pollution Control Board	On line treated effluent analyzer installed in consultation with State Pollution Control Board.
14	No oily sludge should be generated and stored as was being done in the past.	The generation of oily sludge is minimized by switching over of services of tanks in BH crude and imported crude oil service and by extraction of oil from the sludge. Sludge generated is processed continuously.
15	The project authority should prepare a well designed scheme for solid and hazardous wastes disposal generated from CRL, taking into account the suggestions made by consultants in the EIA report. The plan for disposal duly approved from the State Pollution Control Board should be submitted to the Ministry within six months and adequate space should be provided for it, as far as possible on the premises itself.	Scheme for solid and hazardous waste disposal was approved by KSPCB. Scheme was subsequently submitted to MoE&F in March 1993. BPCL Kochi Refinery has implemented a scheme for recovery of oil from oily sludge. The oil recovery process consists of a series of physical separation processes. The oil recovered is reprocessed in the refinery process units. Bio remediation is carried out through TERI
		Spent catalyst is disposed by either returning to the original supplier or selling to the recycler or is disposed in secured land fill.
		ETP Chemical sludge is disposed in secured landfill.
		Bio sludge from effluent treatment plant is used as manure.
16	Green belt, 500 meters wide, as recommended by the consultants in their report should be developed and maintained. The treated effluent conforming to the standard should be used for green belt development plan taking into account attenuation factors, soil characteristics etc. should be prepared and submitted to this Ministry within 6 months.	Complied

17	Relocate LPG spheres so that risk due to these remains within the plant area	As it was not feasible to relocate the LPG spheres, it had been desired by MoE&F to acquire land in the adjoining area where impact will be more. Accordingly, the adjoining land of 63 acres had been acquired by CRL that has been occupied by IOC, HPC and BPC area.
		Further, LPG spheres are progressively being replaced with mounded storages.
18	A detailed risk analysis study based on Maximum Credible Accident Analysis should be done and submitted to this Ministry once the process design / technology and lay out is frozen. Based on this, a Disaster Management Plan has to be prepared and after approval by the concerned Nodal Agency, should be submitted to this Ministry within six months.	Risk analysis study had been conducted and was submitted to MoEF &CC in October 1991. Disaster Management Plan was submitted to MoEF &CC in February 1992.
19	Feasibility of using 20 tonner truck may be studied / assessed wherever road transport is being envisaged and report submitted to this Ministry in three months.	20 Tonner trucks were not viable and this was informed to MoEF &CC.
20	The project authority must set up laboratory facilities for collection and analysis of samples under the supervision of competent technical personnel, who will directly report to the Chief Executive.	Complied
21	A Separate Environmental Management Cell with suitably qualified people to carry out various functions should be set up under the control of Senior Executive, who will report directly to the Head of the organization.	Already exists.
22	The funds earmarked for the environmental protection measures should not be diverted for other purposes and year-wise expenditure should be reported this Ministry.	Complied with An estimated amount of Rs.74/- crores have been spent during implementation of Capacity Expansion Project towards environmental protection measures.