

F. No. J-11011/292/2011 - IA II (I)  
**Government of India**  
Ministry of Environment, Forests and Climate Change  
(I.A. Division)

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Dated: 18<sup>th</sup> September, 2014

To,

Shri K.P. Sukthanker, General Manager  
M/s Rama Phosphate Ltd.  
4807/11, Jhamarkotra Road, Village: Umra  
Tehsil- Girwa, District Udaipur- 313901, Rajasthan

**E -mail: [rama.udaipur@ramagroup.co.in](mailto:rama.udaipur@ramagroup.co.in) ; [info@enkayenviro.com](mailto:info@enkayenviro.com) ;**  
**Fax No. : 0294-2342070**

**Subject:** Expansion Project of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 300,000 TPA converted in Granular SSP), NPK (60,000 TPA), and Additional Boronated SSP (25,000TPA), and LABA (20,000 TPA) of **M/s Rama Phosphates Ltd.**, at Plot No. 4807/11, Jhamarkotra Road, village Umra, Tehsil Girwa, Dist. Udaipur, Rajasthan-- **Environmental Clearance reg.**

**Ref : Your letter no. nil dated 5<sup>th</sup> June, 2013.**

Sir,

Kindly refer your letter no. nil dated 5<sup>th</sup> June, 2013 alongwith project documents including Form I, Terms of References, Pre-feasibility Report, EIA/EMP Report, public hearing report and subsequent submission of additional information vide letters dated 17<sup>th</sup> September, 2013 ( received in the Ministry on 13<sup>th</sup> March, 2014) regarding above mentioned project.

2.0 The Ministry of Environment and Forests has examined the application. It is noted that proposal is for expansion of Single Super Phosphate (1,81,000 to 3,15,000 TPA) and 300,000 TPA converted in Granular SSP), NPK (60,000 TPA) and additional Boronated SSP (25,000TPA), and LABA (20,000 TPA) of M/s Rama Phosphates Ltd., at Plot No. 4807/11, Jhamarkotra Road, village Umra, Tehsil Girwa, Dist. Udaipur, Rajasthan. Total plot area is 73,200 m<sup>2</sup>. Total cost of expansion project is Rs. 1329.5 Lakhs. Expansion will be done in the existing unit. Udai Sagar lake is located at a distance of 4.0 Km from the site. Following products will be manufactured:

S.N.	Products	Capacity (TPA)		
		Existing	Proposed	Total
1	SSP	1,81,000	134000	3,15,000
2	GSSP	66,000	2,34,000	3,00,000
3	NPK	60,000	--	60,000
4	Boronated SSP	--	25,000	25,000
5	LABSA	--	20,000	20,000

3.0 Silicon Fluoride gases will be passed through three stage–wet scrubbers before discharging into atmosphere through adequate stack height to control fluorine content within 15 mg/m<sup>3</sup>. Cyclone followed by bag filter will be provided to SSP plant and grinding section for controlling fugitive emissions. Cyclone dust collector will be provided to dryer in GSSP manufacturing and NPK manufacturing. Total fresh water requirement from tanker water supply will be increased from 180 m<sup>3</sup>/day to 313.5 m<sup>3</sup>/day after expansion. Industrial wastewater generation will be increased from 55 m<sup>3</sup>/day to 95 m<sup>3</sup>/day and treated in effluent treatment plant (ETP). Treated industrial effluent will be reused again in the process. Domestic wastewater generation will be increased from 4 to 5.5 m<sup>3</sup>/day and treated in the sewage treatment plant (STP). Wet scrubber sludge will be reused in the process. Spent acid from LABSA will be reused in SSP plant. Waste/spent oil and spent catalyst will be handed over to authorized recyclers/re-processors.

4.0 Public hearing / consultation meeting was held on 25<sup>th</sup> April, 2013.

5.0 NPK Fertilizer Plant is listed at S.N. 5(a) under Category 'A' and appraised at the Central level. However, Single Super Phosphate Fertilizer plant is listed at S.N. 5(a) under Category 'B' and appraised at the State level. Since project proposal is integrated in nature, proposal is treated as Category 'A' project and appraised at the Central level.

6.0 The proposal was considered by the Expert Appraisal Committee (Industry) in its 28<sup>th</sup>, 3<sup>rd</sup>, 10<sup>th</sup> and meetings held during 20<sup>th</sup>-21<sup>st</sup> October, 2011, 3<sup>rd</sup>-5<sup>th</sup> December, 2012, 29<sup>th</sup>-31<sup>st</sup> July, 2013 and **28<sup>th</sup>-30<sup>th</sup> May 2014** respectively. Project Proponent and the EIA Consultant Enkay Enviro Services have presented EIA / EMP report as per the TOR. EAC has found the EIA Study / EMP Report to be adequate and in full consonance with the presented TORs. The Committee recommended the proposal for environmental clearance.

7.0 Based on the information submitted by the project proponent, the Ministry of Environment and Forests hereby accords environmental clearance to above project under the provisions of EIA Notification dated 14<sup>th</sup> September 2006, subject to the compliance of the following Specific and General Conditions:

**A. SPECIFIC CONDITIONS:**

- i) Silicon Fluoride gases shall be passed through three stage–wet scrubbers before discharging into atmosphere through adequate stack height to control fluorine content within 15 mg/m<sup>3</sup>. After three stages, if fluorine content in emission is not meeting the prescribed norms then efficiency of scrubber shall be improved by adding additional stage of scrubber. Scrubbing shall have interlocking system with main plant. Cyclone followed by bag filter shall be provided to SSP plant and grinding section for controlling fugitive emissions. Cyclone dust collector will be provided to dryer in GSSP manufacturing and NPK manufacturing.
- ii) The gaseous emissions (SO<sub>2</sub>, NO<sub>x</sub>, CO and Fluoride) and particulate matter from process stacks shall conform to the norms prescribed by the CPCB/ Rajasthan State Pollution Control Board (RSPCB) from time to time. At no time, the emission levels shall go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.
- iii) Ambient air quality data shall be collected as per NAAQES standards notified by the Ministry vide G.S.R. No. 826(E) dated 16<sup>th</sup> September, 2009. The levels of PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub> and Fluoride shall be monitored in the ambient air and displayed at a convenient location

near the main gate of the company and at important public places. The company shall upload the results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and RSPCB.

- iv) In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored.
- v) Fluoride monitoring through continuous fluoride analyzer shall be carried out in ambient air as well as stack.
- vi) The gaseous emissions from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.
- vii) Total fresh water requirement from water tanker supply shall not exceed 313.5m<sup>3</sup>/day. No ground water shall be used.
- viii) Efforts shall be made to make use of rain water harvested. If needed, capacity of the reservoir shall be enhanced to meet the maximum water requirement. Only balance water requirement shall be met from other sources. As proposed, Check dams with water storage capacity 3780 m<sup>3</sup> and 4500 m<sup>3</sup> respectively shall be created near plant premises.
- ix) As proposed, industrial effluent shall be treated in effluent treatment plant (ETP) and recycled back in the process.
- x) No effluent shall be discharged outside the premises and 'Zero' discharge shall be ensured.
- xi) Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.
- xii) As proposed, H<sub>2</sub>SiF<sub>6</sub> liquor shall be filtered through filter press and clear liquor shall be reused to plant premises for acid dilution. The SiO<sub>2</sub> shall be used as filler material for SSP final products. Adequate pollution control system shall be provided.
- xiii) The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date for management of Hazardous wastes and prior permission from RSPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. A copy of the same shall be submitted to the Ministry and Ministry's Regional Office at Lucknow.
- xiv) The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All Transportation of Hazardous Chemicals shall be as *per* the Motor Vehicle Act (MVA), 1989.
- xv) The company shall undertake following waste minimization measures :-
  - a. Metering and control of quantities of active ingredients to minimize waste.

- b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
- c. Use of automated filling to minimize spillage.
- d. Use of Close Feed system into batch reactors.
- e. Venting equipment through vapour recovery system.
- f. Use of high pressure hoses for equipment clearing to reduce wastewater generation.
- xvi) The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- xvii) Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- xviii) A comprehensive Green belt development plan shall be developed in at least 33 % area in and around the plant as per the CPCB guidelines to mitigate the effects of air emissions in consultation with local DFO. The plan shall be submitted to the Regional Office of the Ministry at Lucknow 3 months of issue of environment clearance letter.
- xix) All the commitments made to the public during Public Hearing/public consultation meeting held on 25th April, 2013 shall be satisfactorily implemented and adequate budget provision shall be made accordingly.
- xx) At least 5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment (ESC) based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Lucknow. Implementation of such program shall be ensured accordingly in a time bound manner.
- xxi) The Company shall submit within three months their policy towards Corporate Environment Responsibility which should inter-alia address (i) Standard operating process/procedure to bring into focus any infringement/deviation/ violation of environmental or forest norms/conditions, (ii) Hierarchical system or Administrative order of the Company to deal with environmental issues and ensuring compliance to the environmental clearance conditions and (iii) System of reporting of non-compliance/violation environmental norms to the Board of Directors of the company and/or stakeholders or shareholders.
- xxii) Provision shall be made for the housing for the construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.

**B. GENERAL CONDITIONS:**

- i. The project authorities must strictly adhere to the stipulations made by the Rajasthan State Pollution Control Board (RSPCB), State Government and any other statutory authority.
- ii. No further expansion or modification in the project shall be carried out without prior approval of the Ministry of Environment & Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.

- iii. The project authorities must strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 2000 as amended subsequently. Prior approvals from Chief Inspectorate of Factories, Chief Controller of Explosives, Fire Safety Inspectorate etc. must be obtained, wherever applicable.
- iv. The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
- v. A separate Environmental Management Cell equipped with full fledged laboratory facilities must be set up to carry out the environmental management and monitoring functions.
- vi. 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.
- vii. 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 RSPCB. The criteria pollutant levels namely; PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, HC (Methane & Non-methane), VOCs (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
- viii. The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office of MOEF, the respective Zonal Office of CPCB and the RSPCB. The Regional Office of this Ministry / CPCB / RSPCB shall monitor the stipulated conditions. Environmental Clearance and six monthly compliance status reports shall be posted on the website of the company.
- ix. The environmental statement for each financial year ending 31<sup>st</sup> March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company alongwith the status of compliance of environmental conditions and shall also be sent to the respective Regional Offices of the MOEF by e-mail.
- x. The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the RSPCB and may also be seen at Website of the Ministry of Environment and Forests at <http://envfor.nic.in>. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the Regional office.
- xi. 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.

8.0 The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.

9.0 The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.

**10.0** The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.

**(Lalit Bokolia)**  
**Additional Director**

Copy to:

1. The Principal Secretary, Environment & Forests Department, Government of Rajasthan, Secretariat, Jaipur.
2. The Chief Conservator of Forests (Central), Regional Office, Kendriya Bhavan, 5<sup>th</sup> Floor, Sector-H, Aliganj, Lucknow-226024.
3. The Chairman, Central Pollution Control Board Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar, New Delhi - 110 032.
4. The Chairman, Rajasthan Pollution Control Board, 20-A, Heera Bagh, Jaipur.
5. The Joint Secretary, IA II(I), Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi.
6. Monitoring Cell, Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi.
7. Guard File/Monitoring File/Record File.

**(Lalit Bokolia)**  
**Additional Director**

