

**CONSENT CONDITIONS AND COMPLIANCE UNDER WATER ACT- 730 MT PENTA PRODUCTION FOR THE PERIOD  
OCTOBER-2022 TO MARCH-2023**

CONSENT ORDER NO. 2208143075501, DATED: 08/08/2022.  
PROCEEDINGS NO. T3/TNPCB/F.0020CUD/RL/CUD/W/2022, DATED: 08/08/2022

| Sl No.                       | Consent (Special) condition No.            | SPECIAL CONDITIONS Conditions   | Compliance Status                     |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
|------------------------------|--|---|---------------------------------------|--------------------------------|--------------------------------|---------------------------|------------------------------------|--------|------|---------------------------------------|--------------|----------------|--|----------------------|--|----------------------------------|--------------|----------------------|---|--------------|---|------------------------------|--------------------------------|----------------------------|---------------------------|----------|--------|----------|--------|----------|----------|--------|--------|----------|--------|--------|--------|----------|--------|--------|--------|----------|--------|--------|--------|----------|--------|--------|--------|
|                              |  |   | Month/ Production (MT/month)          | Formaldehyde (100%) (MT/month) | Pentaerythritol (MT/month)     | Sodium formate (MT/month) |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 1                            | 1  | <p>This renewal of consent is valid for establishing the facility for the manufacture of products/byproducts (Col.2) at the rate (Col 3) mentioned below. Any change in the product/byproduct and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.</p> <table border="1"> <thead> <tr> <th>Sl.NO</th> <th>Description</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>a</td> <td colspan="2"><i>Main Products manufactured:</i></td> </tr> <tr> <td>1.</td> <td>Formaldehyde (100%)</td> <td>675 MT/Month</td> </tr> <tr> <td>2.</td> <td>Pentaerythritol (powder and solution form)</td> <td>730 MT/Month</td> </tr> <tr> <td>b</td> <td colspan="2"><i>By products manufactured:</i></td> </tr> <tr> <td>1.</td> <td>Sodium Formate (powder and solution form)</td> <td>480 MT/Month</td> </tr> </tbody> </table> | Sl.NO                                 | Description                    | Quantity                       | a                         | <i>Main Products manufactured:</i> |        | 1.   | Formaldehyde (100%)                   | 675 MT/Month | 2.             | Pentaerythritol (powder and solution form) | 730 MT/Month         | b  | <i>By products manufactured:</i> |              | 1.                   | Sodium Formate (powder and solution form) | 480 MT/Month | <table border="1"> <thead> <tr> <th>Month/ Production (MT/month)</th> <th>Formaldehyde (100%) (MT/month)</th> <th>Pentaerythritol (MT/month)</th> <th>Sodium formate (MT/month)</th> </tr> </thead> <tbody> <tr> <td>Oct 2022</td> <td>667.04</td> <td>729.77</td> <td>475.73</td> </tr> <tr> <td>Nov 2022</td> <td>595.88</td> <td>729.91</td> <td>420.59</td> </tr> <tr> <td>Dec 2022</td> <td>516.65</td> <td>632.08</td> <td>391.50</td> </tr> <tr> <td>Jan 2023</td> <td>527.70</td> <td>575.55</td> <td>349.64</td> </tr> <tr> <td>Feb 2023</td> <td>534.23</td> <td>587.10</td> <td>361.72</td> </tr> <tr> <td>Mar 2023</td> <td>539.08</td> <td>547.29</td> <td>352.38</td> </tr> </tbody> </table> <p>Any change in the product/byproduct and its quantity will be brought to the notice of the board.</p> | Month/ Production (MT/month) | Formaldehyde (100%) (MT/month) | Pentaerythritol (MT/month) | Sodium formate (MT/month) | Oct 2022 | 667.04 | 729.77   | 475.73 | Nov 2022 | 595.88   | 729.91 | 420.59 | Dec 2022 | 516.65 | 632.08 | 391.50 | Jan 2023 | 527.70 | 575.55 | 349.64 | Feb 2023 | 534.23 | 587.10 | 361.72 | Mar 2023 | 539.08 | 547.29 | 352.38 |
| Sl.NO                        | Description                                | Quantity  |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| a                            | <i>Main Products manufactured:</i>         |   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 1.                           | Formaldehyde (100%)                        | 675 MT/Month  |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 2.                           | Pentaerythritol (powder and solution form) | 730 MT/Month  |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| b                            | <i>By products manufactured:</i>           |   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 1.                           | Sodium Formate (powder and solution form)  | 480 MT/Month  |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Month/ Production (MT/month) | Formaldehyde (100%) (MT/month)             | Pentaerythritol (MT/month)  | Sodium formate (MT/month)             |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Oct 2022                     | 667.04                                     | 729.77  | 475.73                                |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Nov 2022                     | 595.88                                     | 729.91  | 420.59                                |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Dec 2022                     | 516.65                                     | 632.08  | 391.50                                |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Jan 2023                     | 527.70                                     | 575.55  | 349.64                                |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Feb 2023                     | 534.23                                     | 587.10  | 361.72                                |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Mar 2023                     | 539.08                                     | 547.29  | 352.38                                |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 2                            | 2  | <p>This renewal of consent is valid for establishing the facility with the below mentioned outlets for the discharge of</p> <table border="1"> <thead> <tr> <th>Outlet Number</th> <th>Description of Outlet</th> <th>Maximum daily discharge in KLD</th> <th>Point of disposal</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Sewage</td> <td>45.0</td> <td>Recycling to STP and reused in Garden</td> </tr> <tr> <td>2.</td> <td>Trade Effluent</td> <td>131.0</td> <td>Recycling to process</td> </tr> </tbody> </table> <p>sewage/trade effluent. Any change in the outlets and the quantity has to be brought to the notice of the Board and fresh consent has to be obtained.</p>   | Outlet Number                         | Description of Outlet          | Maximum daily discharge in KLD | Point of disposal         | 1.                                 | Sewage | 45.0 | Recycling to STP and reused in Garden | 2.           | Trade Effluent | 131.0                                      | Recycling to process | <table border="1"> <thead> <tr> <th>Month/ Discharge (KLD)</th> <th>Sewage (KLD)</th> <th>Trade effluent (KLD)</th> </tr> </thead> <tbody> <tr> <td>Oct 2022</td> <td>22.26</td> <td>92.48</td> </tr> <tr> <td>Nov 2022</td> <td>21.53</td> <td>90.63</td> </tr> <tr> <td>Dec 2022</td> <td>23.74</td> <td>84.93</td> </tr> <tr> <td>Jan 2023</td> <td>21.42</td> <td>76.90</td> </tr> <tr> <td>Feb 2023</td> <td>19.78</td> <td>76.75</td> </tr> <tr> <td>Mar 2023</td> <td>13.16</td> <td>78.84</td> </tr> </tbody> </table> <p>Any change in the outlets and the quantity will be brought to the notice of the Board.</p> | Month/ Discharge (KLD)           | Sewage (KLD) | Trade effluent (KLD) | Oct 2022                                  | 22.26        | 92.48   | Nov 2022                     | 21.53                          | 90.63                      | Dec 2022                  | 23.74    | 84.93  | Jan 2023 | 21.42  | 76.90    | Feb 2023 | 19.78  | 76.75  | Mar 2023 | 13.16  | 78.84  |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Outlet Number                | Description of Outlet                      | Maximum daily discharge in KLD  | Point of disposal                     |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 1.                           | Sewage                                     | 45.0  | Recycling to STP and reused in Garden |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| 2.                           | Trade Effluent                             | 131.0   | Recycling to process                  |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Month/ Discharge (KLD)       | Sewage (KLD)                               | Trade effluent (KLD)  |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Oct 2022                     | 22.26                                      | 92.48   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Nov 2022                     | 21.53                                      | 90.63   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Dec 2022                     | 23.74                                      | 84.93   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Jan 2023                     | 21.42                                      | 76.90   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Feb 2023                     | 19.78                                      | 76.75   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |
| Mar 2023                     | 13.16                                      | 78.84   |                                       |                                |                                |                           |                                    |        |      |                                       |              |                |  |                      |  |                                  |              |                      |   |              |   |                              |                                |                            |                           |          |        |          |        |          |          |        |        |          |        |        |        |          |        |        |        |          |        |        |        |          |        |        |        |

**Additional Conditions**

| Sl.No. | Consent Conditions  | Compliance Status   |
|--------|---|---|
| 1.     | The Unit shall ensure to comply with the conditions stipulated in the Environment Clearance obtained for expansion activity vide letter No. SEIAA/TN/F.6495/5(f)/EC60/2018 dated 24.04.2018 obtained from SEIAA, Chennai from time to time. | We comply with the conditions stipulated in the Environment Clearance for expansion activity vide letter No. SEIAA/TN/F.6495/5(f)/EC60/2018 |

|    |   |  |
|----|---|--|
| 2. | The unit shall operate and maintain the Zero Liquid Discharge for the treatment and disposal of trade effluent generated from the unit.   | The Zero Liquid Discharge systems are continuously operated for the treatment and disposal of trade effluent generated in the unit.                      |
| 3. | The Unit shall operate and maintain the sewage treatment plant for the treatment sewage generated and the treated sewage shall be utilized for green belt development/gardening purposes inside the premises.   | The Sewage Treatment plant is operated effectively, and the treated water is utilized for green belt development/gardening purposes inside the premises. |
| 4. | The Unit shall operate and maintain the online pH and TDS meter provided in the storm water drains to ensure that no chemical contamination takes place during rains outside the premises at all the time.  | Online pH and conductivity meters are being maintained in the storm water drains.  |
| 5  | The unit shall take necessarily follow up with Directorate of Industrial safety and Health (DISH) and obtain Offsite emergency preparedness plan with due approval from the District collector.   | Offsite emergency plan is being prepared by district administration and the same shall be submitted after DEO approval from collector.                   |
| 6  | The unit shall ensure that a rehearsal of the Offsite emergency plan is conducted at least once in calendar year  | After receipt of Offsite emergency plan, a rehearsal will be planned.  |
| 7  | The unit shall analyze the parameters viz. pH, BOD, TSS, COD, Nitrogen, Total and Fecal Coliform (in MPN) for the treated sewage being discharged inside the unit premises for green belt development and shall comply with the STP standards prescribed by CPCB.   | Complied and the test reports are attached   |
| 8  | The unit shall further continue to development greenbelt inside/outside the premises of the unit.   | 40% of the plot area is green belt. We are continuously developing the green belt.   |
| 9  | The unit shall provide rainwater harvesting facility for all the buildings to recharge the ground water.  | Rainwater harvesting is being done in the plant premises.  |
| 10 | The Unit shall furnish the details of activities done through "Corporate Social Responsibility" along with the amount spent and evidences every year.   | Being submitted every year.  |
| 11 | The unit shall not increase the production without the valid consent of the board.  | Complied   |
| 12 | In case of revision of consent fee by the Government, the unit shall remit the difference in amount within one month from the date of notification. Failing to remit the consent fee, this consent order will be withdrawn without any notice and further action will be initiated against the unit as per law.   | Will be complied   |
| 13 | The unit shall not use 'use and throwaway plastic, such as plastic sheets used for food wrapping spreading on dining table etc. Plastic plates, plastic coated teacups, plastic tumbler, water pouches and packets, plastic straw, plastic carry bag and plastic flags irrespective of thickness within the industry premises Instead unit shall encourage use of eco-friendly alternative such as banana leaf, areca nut palm plate, stainless steel, glass porcelain plates/cups, cloth bag, jute bag et. | We do not use and throwaway plastic. Usage of recommended Eco-friendly alternatives are practiced wherever possible.                                     |
| 14 | The unit shall operate the plant without attracting complaints from the nearby Public   | Will be complied   |
| 15 | This consent order does not absolve from obtaining necessary permission / clearance from other Authority or under other Statute as applicable.  | Agreed upon  |