



भारत सरकार
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
एकीकृत क्षेत्रीय कार्यालय, लखनऊ



Ministry of Environment, Forest & Climate Change
Integrated Regional Office, Lucknow

केन्द्रीय भवन, पंचम तल, सेक्टर-एच, अलीगंज, लखनऊ-226024
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File no. IV/ENV/UP/IND-140/393/2015 / 335

Dated: 25.01.2022

To, -

Member Secretary- Industry -I
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan, Room No. V-304,
Vayu Wing, Jor Bag Road, New Delhi-110003

Sub: Proposed Increase in production of Asbestos Sheets (from 1,08,000 TPA to 1,44,000 TPA) of M/s UP Asbestos Ltd., village-Mau, Taluka Mohanlalganj, Lucknow, UP -regarding

Ref: 1. Ministry EC letter no. EC No. J-11011/567/2011 IA.II (M) dated: 12.06.2015
2. Action Taken Report submitted by Project Authorities vide Letter no. UPAL/MoEF-IRO LKO/2021-22/720 dated 01.11.2021

Sir,

I am directed to state that above project was monitored on 13.01.2021 by the undersigned. During monitoring several non-compliances have been observed. Subsequently, letter has been sent to the project authorities (PAs) vide letter no. IV/ENV/UP/IND-140/393/2015/1244 dated 22.02.2021 for taking necessary action on the non-compliances observed during monitoring. Thereafter, Certified compliance report was issued to PAs vide letter no. IV/ENV/UP/IND-140/393/2015/331 dated 27.10.2021 on their request letter no. UPAL/MoEF/2021-22/645 dated 21.09.2021 received in this office on 24.09.2021 on the basis of visit done on 13.01.2021.

In reply of the non-compliance noticed by this office, PAs have submitted action taken report vide letter no. UPAL/MoEF-IRO LKO/2021-22/720 dated 01.11.2021 received via email on 01.11.2021. As per action taken report, the project was again monitored on 12.01.22 to verify the compliance status of the Non-compliance notices. As per the submitted documents and observation made during site visit, the condition wise reply is furnished below:

SN.	
1.	<p>The renewal of commitment regarding the merely use of the chrysotile white asbestos fibre should be submitted to this office.</p> <p>Reply Submitted by PAs : We submit herewith our renewed commitment regarding merely use of Chrysotile fibre (White Fibre) in the manufacturing process carried out at our manufacturing facility.</p> <p>Observation of the IRO: The renewal of commitment regarding the merely use of the chrysotile white asbestos fibre has been submitted by PAs to this office.</p> <p>Being complied.</p>
2.	<p>During the site visit, the housekeeping was not found up to the mark. The housekeeping within the plant and premises needs improvement and better housekeeping must be adopted like dust extraction system at all transfer point, plugging of leakages from machines and dust and floor should be clean regularly.</p>

	<p>Reply Submitted by PAs: We have improved our housekeeping as suggested. The floors are being cleaned regularly as before with the aid of vacuum cleaners but with increased frequency for improved results. The floors have also been repaired wherever required. Water sprinkling is being done at regular intervals to control dust inside the premises. Cemented roads are being relaid inside the premises for better environment (Pictures attached). Dust extraction system is operational as before and all the machine points from where leakage can take place are being rechecked from time to time.</p> <p>We have taken certain steps which not only helped us in keeping our premises more clean but also helped in protecting environment like installation of fly ash and cement Silos. We have taken power connection from LESA and have discontinued the use of turbine. All the process waste is being reused. For that purpose ball mill has been installed to grind sludge to make it reusable and have also installed pulveriser to grind hard ground waste to convert it into powder form. Bottom templates have been bought to reduce breakages and waste. Most of the high power electrical motors have been replaced by low power motors.</p> <p>In addition to above, in order to conserve energy used for building, conventional lighting system has been replaced by LED. Roof top solar power plant of 1.1 MW has been installed (Pictures of Solar plant attached).</p> <p>Observation of the IRO: As per information submitted by PAs and also observed during site visit, it has been found that PAs have installed plugging of leakages from machines, installation of Flyash and Cement Silos. They have taken certain steps to improve the housekeeping like betterment of dust extraction system mainly at transfer point of Flyash and Cement feeding point/Silos, Salvage point /pulverizer, carbo cutter and Asbestos cement roofing sheet plant. Cemented roads are found re-laid within the plant premises. As stated by PAs, they have discontinued the use of turbines to produce the electricity and taken the connection from LESA. PAs have assured to provide the cemented roads throughout the plant premises in the coming financial year. Being complied.</p>
3.	<p>The copy of the certificate from the supplier of chrysotile fibre that it does not contain any toxic or trace metals should be submitted to this office.</p> <p>Reply Submitted by PAs : Copy of the certificate from the supplier of Chrysotile fibre that it does not contain any toxic or trace metals is being enclosed herewith.</p> <p>Observation of the IRO: The copy of the certificate from the supplier of chrysotile fibre that it mainly consists of chrysotile fibre and calcite appears as traces in the samples has been submitted to this office. Complied.</p>
4.	<p>The action plan for RWH measures should be submitted by PAs to this office.</p> <p>Reply Submitted by PAs : The rain water harvesting system is already there inside the premises. Water is collected from roof top through drain pipes and collected in concrete tanks. The water collected thus is pumped to overhead tank and from there it is used in process, wet mopping and dust suppression. The ground water collected through drains is recharged into recharge well.</p> <p>Observation of the IRO: As found during site visit, total 04 nos. of RWH Pits are provided within project premises and details of the RWH measures has been submitted by PAs to this office. Complied.</p>
5.	<p>The information about the allocation of separate budget for the implementation on the commitments made to the public during the Public Hearing should be submitted to this office.</p>

Reply Submitted by PAs:

No commitments were made during the Public Hearing which took place on 23.03.2013 and was presided over by ADM (Admin.) Shri Davendra Kumar Pandey. During the proceedings, regular nature of jobs were advised to be done by us related to the expansion hence, no separate budget was allocated for that purpose. In this regard:-

1. No change was done in the machinery except change in diameter of the sheet forming drum.
2. A separate shed was made for keeping the hazardous waste and was stored there only.
3. The hazardous waste/sludge was being given to designated authorised facility for disposal and / or reuse in the circuit.
4. The effluent after separating the sludge was being reused in the process for preparation of slurry which constitutes water and a mix of raw materials.
5. The water is being sprinkled on regular basis inside the premises to suppress fly ash and cement dust. Air quality monitoring is being done through an authorised lab. and the results that of are being submitted to UPPCB every quarter as prescribed.
6. Till the boiler was operational, only rice husk was being used as a fuel. Since we have taken power connection from LESA and have also installed roof top solar plant of 1.1MW, the use of boiler has been discontinued and the plant is now being run by either of these two sources.
7. For opening of fibre bags, automatic bag opening device with bag shredder was already there and was of appropriate capacity hence no changes were done.
8. Till the boiler (turbine) was in use no change was done in it's construction and no alternate fuel was being used (now discontinued because we have taken power connection and installed solar power plant).
9. Water is being sprinkled inside the premises on regular basis to suppress the dust due to movement of trucks for loading and unloading of raw materials & finished goods.
10. Asbestos, fly ash and cement are being handles as per the guidelines.
11. Dust masks are being provided to the workers and staff as well since the beginning.
12. The green belt was being maintained in the area prescribed by MoEF but now consequent to reduction in factory area we would maintain the green belt as per the amended TOR.

Observation of the IRO:

As per submitted information by PAs and also observed during site visit, the commitment made during public hearing related to providing Job employment, storage of hazardous waste and its use in ball mill, better housekeeping, installation of solar plant of 1.1 MW and power connection from LESA has been complied with proper handling of Asbestos, fly ash and cement.

Complied.

6. As stated by PAs, green belt area is more than 33% of the total plot area. However, the details about the species planted, their no. and year of plantation with survival status with covered area should be submitted to this office.

Reply Submitted by PAs :

As per the amended TOR we have to maintain 40% of the plot area of 26.03 acres which comes to 10.41 acres as green belt with a tree density of 2500 trees per hectare i.e. we need to have around 10500 trees.

During the rainy season 4000 more trees have been planted in addition to existing trees. Out of these 4000 trees, 2500 trees were provided by Forest Department free of cost and rest were purchased by us from different nurseries. The bills for the plants purchased by us are attached herewith.

Following species have been planted with their nos. mentioned against them:

Gulmohar	550 nos.	Bargad	20 nos.
Neem	275 nos.	Pakad	50 nos.
Kadam	55 nos.	Pipal	40 nos.
Savni	105 nos.	Karanji	800 nos.
Kasia	100 nos.	Shisham	430 nos.
Imli	60 nos.	Manokamni	110 nos.
Gulachin Champa	300 nos.	Ashok	70 nos.
Amrud	100 nos.	Teak	200 nos.
Babul	200 nos.	Singri	600 nos.
Shaghan	120 nos.		

	<p>Observation of the IRO: As per submitted information by PAs, the development of the green belt has been done around 10.41 acre, which is about 40% of the available total plot area (26.03 acre) for Asbestos Industry as per the EC amendment vide letter no. -11011/567/2011-IA.II(I) dated 14.07.2020. The details of plant species planted with their no. have been submitted by the PAs. Complied.</p>								
7.	<p>The item wise details along with time bound action plan regarding the 5% of the total cost of the project earmarked towards Enterprise Social Commitment based on Public Hearing issues to should be submitted to this office.</p> <p>Reply Submitted by PAs: Item wise expenses amounting to Rs.8.00 lac incurred towards Enterprise Social Commitment from 01.04.2016 to 31.03.2021 is given below:</p> <ul style="list-style-type: none"> Rs. 5 Lac were spent towards health care, drinking water, alternative livelihood, environmental protection and infrastructure development through Aakar Charitable trust, Janam Bhumi Kshetra, by way of giving plants to forest department on the advice of UPPCB and participating in CM'S Green Initiatives. Rs. 2.00 Lacs were spent towards Education and Communication by way of aiding village school, by donating sheets for repairing work and making new roofs of the schools paying school fees for poor and needy students. PAs have provided sheets worth Rs. 1 lacs to La Martiniere tennis Academy towards Sport and culture. <p>Observation of the IRO: As per submitted information by PAs, Enterprises social commitment based on public hearing are being implemented. Item wise detail has been given as stated above by PAs. Being complied.</p>								
8.	<p>The details of the fund earmarked for socio-economic development and action plan is to be submitted to regional office.</p> <p>Reply Submitted by PAs: During the year 2020-21 around 9.50 lac were spent towards CSR under different heads. The head wise details are given below as attached annexures.</p> <p>Nasha Mukti Aabhiyan- Rs.76,000 Blanket distribution during cold season – Rs. 1,77,000 Installation of CCTV camera in Mohanlalganj Town Area- Rs. 2,10,000 Covid help for Food and Medicine- Rs. 69,390 Asbestos Sheet distribution- Rs. 4, 17,670</p> <p>Observation of the IRO: The detail of the expenditure done for socio-economic development of year has been submitted for year 2020-21 with relevant supporting enclosures. Complied.</p>								
9.	<p>The detailed report should be submitted on implementation and expenditure for environmental safeguards to this regional office.</p> <p>Reply Submitted by PAs: Total cost already incurred on implementation for environmental safeguards is Rs.7,01,62,972/-. Head wise expenditure is given below:</p> <table> <tr> <td>Wet fibre opener</td><td>Rs. 75,782</td></tr> <tr> <td>Reclamation machine</td><td>Rs. 1,16,824</td></tr> <tr> <td>Bag opening machine</td><td>Rs.17,61,770</td></tr> <tr> <td>Bag opening machine</td><td>Rs.12,98,520</td></tr> </table>	Wet fibre opener	Rs. 75,782	Reclamation machine	Rs. 1,16,824	Bag opening machine	Rs.17,61,770	Bag opening machine	Rs.12,98,520
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	25" Pulveriser machine 14.09.2010	Rs.1,75,500
	Pollution control equipment	Rs.8.08,000
	Pollution control	Rs. 3,90,658
	Occupational health	Rs.1,89,845
	Environmental monitoring	Rs.1,26,091
	Solar Power Plant	Rs. 6,01,69,982
	Cement Silos	Rs.50,50,000
	Observation of the IRO: As per submitted document by PAs, total Rs. 7,01,62,972 already incurred for environmental safeguards as stated above for various purposes. Being complied.	
10.	The copy of the consent should be submitted to this office. Further, the renewal of the consent should be also obtained from the concerned authority. Reply Submitted by PAs: Copies of the consent both Air & Water for the period from 01.01.2021 to 31.12.2022 are enclosed herewith. Observation of the IRO: As per document submitted by PAs, PAs have obtained consent to operate (CTO) for Air and Water from UPPCB vide letter no. 111833/UPPCB/Lucknow (LAB)/CTO/air/LUCKNOW/2020 and letter no. 111833/UPPCB/Lucknow(LAB)/CTO/air/LUCKNOW/2020 respectively both dated 04.01.2021 valid till 31.12.2022. Complied.	

Yours faithfully,

[Signature]
25.01.22
(Dr. Preeti Tripathi)
Scientist 'C'

Copy to:

Asstt. Factory Manager, M/s U.P. Asbestos Ltd., Mahmodabad Estate Building, Hazaratganj, Lucknow
226001 Uttar Pradesh., Email:: upal.sunil@gmail.com

[Signature]
25.01.22
(Dr. Preeti Tripathi)
Scientist 'C'

