



## CHEMFAB ALKALIS KARAIKAL LIMITED

CAKL/MoEF&CC/C-012/2026

06.03.2026

Scientist 'E'  
Ministry of Environment, Forest and Climate Change,  
Regional Office,  
I Floor Additional Office Block for GPOA,  
Shastri Bhawan  
Haddows Road,  
Nungambakkam,  
Chennai – 600034.

Dear Sir,

**Sub : Submission of a Six-Monthly Monitoring Report – Reg**

**Ref : 1. Ministry of Environment, Forest and Climate Change  
EC22B013PY110910 (issued by SEIAA, Puducherry, File No.  
SEIAA/PDY/EE/266389/2022  
2. Your letter bearing File No. EP/12.1/2025-26/Misc/18/Six  
monthly/PY/310 dated 23<sup>rd</sup> February 2026.**

We wish to inform you that although Environmental Clearance (EC) has been obtained for establishing the new Chlor-alkali plant (Caustic Soda and allied products manufacturing facility) at PIPDIC Growth Centre, Polagam, Karaikal (as referred under Ref. 1), the project activities are presently deferred.

This is due to the lack of adequate infrastructure facilities (especially Power Supply) at the Industrial Growth Centre, Polagam, and the consequent delay in obtaining Consent to Establish (CTE).

In the meantime, we are submitting/uploading the Half-Yearly Compliance Report for your kind reference and records. We will inform once the project activities are initiated.

Kindly acknowledge the receipt of the same.

Thanking you,

Yours truly,

**For CHEMFAB ALKALIS KARAIKAL LIMITED**

**AUTHORISED SIGNATORY**

**Copy to: Puducherry Pollution Control Committee**

CIN No.: U24100TN2019PLC133285

**Member - Dr. Rao's Group of Companies**

Plant: 'No.1, Industrial Growth Centre, Polagam, Karaikal, Puducherry - 609 606

Regd. Off: 'TEAM House', GST Road, Vandalur, Chennai - 600 048, India.

E-mail: chemfabkaraikal@draaholdings.com, [www.chemfabalkalis.com](http://www.chemfabalkalis.com)

**Compliance to the conditions stipulated in the Environmental Clearance (EC) for establishing a New Chlor-alkali plant - Caustic Soda and allied products manufacturing facility at PIPDIC Growth Centre, Polagam, Karaikal, by Ministry of Environment, Forest and Climate Change EC22B013PY110910 (issued by SEIAA, Puducherry, vide File No. SEIAA/PDY/EE/266389/2022**

**Specific conditions:**

<b>Sl. No.</b>	<b>Condition</b>	<b>Compliance</b>
(i)	This clearance is issued under the provisions of the EIA Notification, 2016. All other statutory clearances as applicable to the project shall be obtained by the project proponent from the concerned competent authority including the Consent to Establish and Operate for the proposed plant from the Puducherry Pollution Control Committee (PPCC) and PESO certificate.	All Statutory clearance as applicable for project from the competent agencies has been obtained. This includes Consent to Establish (CTE) vide Ref No.347885 / 2024 dated 04.09.24 from PPCC and Reference Lic No: G/SC/PY/06/81(G106331) dated 18.01.2024 from PESO.
(ii)	The pollution and control measures with regard to wastewater treatment and disposal, air and noise pollution control measures, hazardous waste and solid waste management and all risk mitigation measures shall be strictly implemented as per the Environmental Management Plan submitted by the project proponent and in consonance with existing rules and regulations.	Environmental Management Plan will be implemented on consonance with existing Rules and Regulations.
(iii)	The water requirement for operational phase of the plant shall be fully met from stand-alone desalination plant proposed by the project proponent. The Chlor-Alkali plant shall not be commissioned until required CRZ clearance for the stand-alone desalination plant is obtained from	CRZ clearance for the Desalination plant was obtained on 17/04/2025. We will ensure that the water requirement of plant for operational shall be met from stand-alone desalination plant.

	MoEFCC.	
(iv)	Environment and Safety Audit shall be carried out in different operating zones of the plant at least once in a year and the adequacy of environmental safeguards and plant / occupational safety shall be reviewed and necessary corrective measures shall be taken.	Due to lack of basic infrastructure facilities, the project activities has been deferred. Upon commissioning of the project, the Environment and Safety Audit will be carried out in different operating zones of the plant at least once in a year and the adequacy of environmental safeguards and plant / occupational safety shall be reviewed and necessary corrective measures will be taken.
(v)	Off-site Emergency Plan shall be prepared and implemented in consultation with the District Administration.	Before commissioning of the project, Off-site Emergency Plan will be prepared and implemented in consultation with District Administration.
(vi)	The project proponent shall continuously monitor ambient chlorine levels and implement automatic alarm and control systems.	Ambient chlorine levels will be monitored and necessary automatic alarm and control system.
(vii)	A separate Environment Management Cell (having qualified persons with Environmental Science / Engineering / Management specializations) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	A separate Environment Management Cell equipped with full-fledged laboratory facilities will be set up to carry out Environmental Management and Monitoring functions.
(viii)	As per the MoEFCC OM dated 30.09.2020 superseding the OM dated 01.05.2018 regarding the Corporate Environmental Responsibility, the project proponent shall allocate an amount of Rs. 75 Lakhs towards environment conservation and community welfare activities, which shall be utilized over a period of five years. The said amount shall be utilized for activities like infrastructure creation for	As directed, an amount of Rs. 75 Lakhs will be utilized over a period of 5 years for environment conservation and community welfare activities upon commissioning the project.  We will prepare a separate project report on the proposed environment conservation and community welfare activities in consultation with the

	<p>drinking water supply, sanitation, health, education, skill development, roads, cross drains, electrification including solar power, solid waste management facilities, scientific support and awareness to local farmers to increase yield of crop and fodder, rain water harvesting, soil moisture conservation works, avenue plantation, plantation in community areas, etc. within the project area. The project proponent shall prepare a separate project report on the proposed environment conservation and community welfare activities in consultation with the District Collector and after duly studying the needs of the surrounding villages.</p> <p>Copy of the CER project report shall be submitted to the District Collector, SEIAA, PPCC and Regional Office of MoEFCC. The activities shall be implemented in a time bound manner in consultation with the District Collector. The project progress report shall be submitted to the SEIAA, PPCC and Regional Office of MoEFCC as a part of the half yearly compliance report. The above fund allocated towards environment conservation support activities is to be in addition to the cost envisaged under the CSR budget of the company which will be allocated as per the rules prescribed by the Government of India / Companies Act 2013.</p>	<p>District Collector and after duly studying the needs of the surrounding villages.</p> <p>CER project report will be submitted to the District Collector, SEIAA, PPCC and Regional Office of MoEF&amp;CC.</p> <p>The project progress report will be submitted to the SEIAA, PPCC and Regional Office of MoEF&amp;CC as a part of the half yearly compliance report.</p>
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**General Conditions:**

**I. Statutory compliance**

(i)	The project proponent shall obtain Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water	Obtained Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention
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	(Prevention & Control of Pollution) Act, 1974 from the PPCC and shall submit copy of the same to SEIAA, Puducherry.	& Control of Pollution) Act, 1974 from the PPCC on 4/9/2024 and the copy of the same has been submitted to SEIAA, Puducherry.
(ii)	The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time from PPCC.	Will obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time from PPCC.
(iii)	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 and the Factories Act, 1948 as amended from time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989 as amended from time to time.	Will be complied with

## II. Air quality monitoring and preservation

(i)	The project proponent shall install 24x7 Continuous Emission Monitoring System at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules, 1986 and the data to be transmitted to PPCC and CPCB online servers. This system shall be calibrated from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.	Will be complied with
(ii)	Chlorine sensors shall be provided at 39 strategic points as mentioned in the EMP to monitor ambient chlorine levels. The sensors shall be coupled to automatic	Will be complied with

	alarm and control systems.	
(iii)	The project proponent shall install system to carryout Ambient Air Quality Monitoring for common/criterion parameters relevant to the main pollutants released (e.g. PM10 and PM2.5 in reference to PM emission, and SO2 and NO2 in reference to SO2 and NO2 emissions) within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120° each), covering upwind and downwind directions. Process specific release like Cl2 and HCl mist shall also be monitored.	Will be complied with
(iv)	All liquid raw materials and intermediates shall be charged into Reactors with pumps or under gravity through closed pipes to avoid fugitive emissions.	Will be complied with
(v)	All vents of holding tanks and dosing vessels shall be connected to a Vent Scrubber system comprising of a suction Blower, Alkali Scrubber and before venting through a tall stack.	Will be complied with
(vi)	All process emissions shall be passed through properly designed scrubber and finally released in to atmosphere through adequate stack height.	Will be complied with
(vii)	Vents of HCl storage tanks shall be provided with water filled trap to prevent Acid fumes from escaping out.	Will be connected to scrubbing system
(viii)	All pumps handling hazardous chemicals shall be provided with mechanical seals to prevent fugitive emission. Wherever possible magnetically coupled pumps shall be used.	Will be complied with
(ix)	To control source and the fugitive emissions, suitable pollution control	Will be complied with

	devices shall be installed to meet the prescribed norms and / or the NAAQS. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB / PPCC guidelines.	
(x)	The DG sets shall be equipped with suitable pollution control devices and adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.	Will be complied with
(xi)	The National Ambient Air Quality Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 and amendment from time to time shall be complied with.	Will be complied with

### **III. Water quality monitoring and preservation**

(i)	The project proponent shall install surveillance system with industrial grade IP (Internet Protocol) cameras having PAN, Tilt, Zoom (PTZ) with leased line real time connection for data streaming and transmission of the same. Flow meters shall be installed at inlets and outlets of ZLD. All the data shall be transmitted to CPCB and PPCC online servers.	Will be complied with
(ii)	As committed by the project proponent, Zero Liquid Discharge shall be ensured and treated effluent shall be completely reused within the plant. Guidelines issued by CPCB on Continuous Emission Monitoring Systems (CEMS) from time to time shall be complied with.	Will be complied with
(iii)	The sewage generated shall be treated in	Will be complied with

	suitable Sewage Treatment Plant and reused for gardening within the premises after conforming to the standards prescribed under the Environment (Protection) Rules, 1986 or as specified by the Puducherry Pollution Control Committee while granting Consent under the Water Act, whichever is more stringent.	
(iv)	Total freshwater requirement for plant operation shall be met from desalination plant. Prior permission shall be obtained from MoEFCC under CRZ Notification in this regard.	Will be complied with. Permission was obtained on 17/04/2025 from MoEF&CC under CRZ Notification.
(v)	Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.	Will be complied with
(vi)	The company shall harvest rain water from the roof tops of the buildings and storm water drains to recharge the ground water and utilise the same for different industrial operations within the plant	Will be complied with

#### **IV. Noise monitoring and prevention**

(i)	Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Will be complied with
(ii)	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.	Will be complied with
(iii)	The ambient noise levels should conform to the standards prescribed under	Will be complied with

	Environment (Protection) Rules, 1986 viz., 75 dB(A) during day time and 70 dB(A) during night time.	
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### **V Energy Conservation Measures**

(i)	The energy source for lighting purposes shall preferably be LED based or advanced energy efficient lighting systems	Will be complied with
(ii)	Solar, wind or other renewable energy shall be installed to meet electricity generation equal to 1%of the demand load or as per the state level / local building by-laws requirement which ever is higher.	Will be complied with

### **VI. Waste management**

(i)	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.	Will be complied with
(ii)	Hazardous waste like used oil / spent oil, oil-soaked cotton waste and MME salt shall be disposed off to the cement plants for co-processing, reprocessing units or TSDFs after obtaining necessary Hazardous Waste Authorisation from PPCC	Will be complied with
(iii)	The company shall periodically review their operations and undertake waste minimization measures.	Will be complied with
(iv)	Organic wastes shall be composted / treated in organic waste converter or	Will be complied with

	bio-digestor and use as manure. Inorganic solid waste shall be disposed of for recycling.	
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### VII. Green belt

(i)	The green belt of 5-10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Native species shall be planted in the green belt. Selection of plant species shall be as per the CPCB guidelines in consultation with the Forest Department. Suitable plants and trees that are pollution indicators shall also be planted around factory.	Will be complied with
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### VIII. Safety and Human health issues

(i)	Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.	Will be complied with
(ii)	Following safety features shall be implemented in chlorine handling: a) All Chlorine sections shall be under stringent control and equipped with necessary chlorine handling facilities and manned by trained personnel. b) Chlorine storages shall be subjected to periodic inspection and certification by approved agency. c) Each storage shall be connected to the Hypo Plant for safe venting of	All Safety features in the chlorine handling system will be implemented during project implementation period.

	<p>Chlorine during Emergency.</p> <p>d) Double Valve System shall be adopted in all Chlorine storages</p> <p>e) Two Safety Relief Valves shall be installed in Each Chlorine Storage.</p> <p>f) FENPS System and Water Curtain around the Liquefier section, Chlorine filling area</p> <p>and Chlorine storage bullets shall be provided which gets automatically activated at 0.5 ppm of Chlorine.</p> <p>g) Emergency Suction Hoods shall be provided near the Chlorine Filling Stations for Emergency Evacuation.</p> <p>h) Excess Flow Check Valve shall be provided in Liquid Chlorine Line as a safety measure.</p> <p>i) Remote operation for transfer of Liquid Chlorine From one storage to another from Control Room in case of emergency.</p> <p>j) One Chlorine storage bullet shall always be maintained empty to facilitate transfer during emergency.</p> <p>k) Sodium Hypo Plant shall be fully operational.</p>	
	<p>l) Additional Chlorine Leak Detectors shall be provided inside each filling cabin.</p> <p>m) Filling of Liquid Chlorine into Tonners shall be through Automatic Weighing System which cuts off Chlorine supply based on preset value.</p> <p>n) Excess filling in cylinders as well as</p>	

	<p>filling of test due cylinders shall be prevented by specially designed software with cylinder status tracking.</p> <p>o) Two Emergency Stop Switches shall be provided to stop filling in case of emergency.</p> <p>p) Emergency Blower with Suction Hoods shall be provided in all the Chlorine Filling Points.</p> <p>q) Expansion Vessel with Rupture Disc shall be provided in the Liquid Chlorine Line as a Safety Measure.</p>	
(iii)	<p>Following safety features in Hydrogen Handling:</p> <p>a) All safety interlocks and relief valves shall be tested at regular intervals.</p> <p>b) GPRS shall be installed in Hydrogen trucks to closely monitor their movement.</p> <p>c) Hydrogen Leak Detectors and Flame Sensors shall be installed at strategic locations in the Hydrogen Bottling Plant and connected to DCS.</p> <p>d) Emergency shut system for hydrogen filling operation shall be in place.</p> <p>e) Fire monitors and fire hydrants points shall be provided in and around the plant.</p> <p>f) Water sprinkler system shall be provided at hydrogen bottling plant.</p>	All Safety features in the hydrogen handling system will be implemented during project implementation period.
(iv)	Proper emergency shutdown procedure shall be put in place for all the plant operations.	Will be complied with
(v)	The unit shall make arrangement for protection of possible fire hazards during	Fire Hydrant system as per norms has already been implemented in the

	manufacturing process and material handling. Firefighting system shall be as per norms.	premises and the same will be extended to CSL facility during project implementation.
(vi)	Personal Protection Equipment (PPE) shall be provided as per the norms of Factories Act.	Will be provided.
(vii)	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis.	Sufficient training will be imparted.
(viii)	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Will be complied with
(ix)	Occupational Health Centre with adequate facilities shall be established within the premises for emergency first aid and care.	Will be complied with
(x)	The project proponent shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 with reference to preparation of safety report, safety audit report, onsite emergency plans, offsite emergency plans, conduct of mock drills and submission of reports.	Will be complied with
(xi)	There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.	Will be complied with

## **IX. Corporate Environment Responsibility**

(i)	The company shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should prescribe standard operating procedures to have proper checks and balances and to bring into focus any infringements / deviation / violation of the environment / forest / wildlife norms / conditions. The company shall have defined system of reporting infringements / deviation / violation of the environmental / forest / wildlife norms / conditions and / or shareholders / stake holders. The copy of the board resolution in this regard shall be submitted as a part of half yearly compliance report.	Will be complied with
(ii)	A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly report to the head of the organization.	Will be complied with
(iii)	Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the SEIAA, PPCC and Regional Office of MoEFCC along with the Six-Monthly Compliance Report.	Will be complied with
(iv)	Self-environmental audit shall be conducted annually. Every three years third party environmental audit shall be	Will be conducted periodically after the commissioning of the project.

	carried out.	

## X. Miscellaneous

(i)	The project proponent shall make public the environmental clearance granted for their project along with the environmental conditions and safeguards at their cost by prominently advertising it at least in two local newspapers of the District, of which one shall be in the vernacular language within seven days and in addition this shall also be displayed in the project proponent's website permanently.	Complied with
(ii)	The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government (Industries Department and PPCC) who in turn has to display the same for 30 days from the date of receipt.	The copy of the EC was circulated all the relevant departments.
(iii)	No further expansion or modifications in the plant shall be carried out without prior Environmental Clearance from SEIAA / MoEFCC, as applicable. In case of any deviation or alterations in the project proposal from those submitted to the SEIAA for clearance, a fresh reference shall be made to the SEIAA / MoEFCC, as applicable, to assess the adequacy of the conditions imposed and to add additional environmental protection measures required, if any.	Noted and we will ensure prior EC is obtained for future expansion and modification, if any.
(iv)	The project proponent shall upload the status of compliance of the stipulated	Will be complied with

	environment clearance conditions, including results of monitored data on their website and update the same on half-yearly basis.	
(v)	The project proponent shall monitor the criteria pollutants level viz., PM10, SO2, NO2 (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects and display the same at a convenient location for disclosure to the public and put on the website of the company.	We will undertake to monitor the pollutant levels upon commissioning of the project.
(vi)	The project proponent shall submit six-monthly compliance report on the status of the compliance of the stipulated environmental conditions including results of monitored data in hard and soft copies on 1st June and 1st December of each calendar year in respect of the conditions stipulated in the Environmental Clearance issued to SEIAA, PPCC and Regional Office of CPCB and MoEFCC.	Due to lack of infrastructure facility (basically power) at the Industrial Growth Center, we have deferred the project indefinitely and the works will be commenced based on the clear indication of the availability of Power.
(vii)	The project proponent shall submit six-monthly reports on the status of the compliance of the stipulated environmental conditions on the website of the Ministry of Environment, Forest and Climate Change at environment clearance portal.	Being complied with
(viii)	The project proponent shall submit the Environmental Statement for each financial year in Form-V to the Puducherry Pollution Control Committee as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.	Will be submitted regularly once the project is commissioned.

(ix)	The project proponent 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 start of production operation by the Project Proponent.	Will be complied with
(x)	The project authorities must strictly adhere to the stipulations made by the Puducherry Pollution Control Committee and the U.T. Government.	Will be complied with
(xi)	Concealing factual data or submission of false/fabricated data may result in revocation of this environmental clearance and attract action under the provisions of the Environment (Protection) Act, 1986.	Noted
(xii)	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted
(xiii)	The SEIAA reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.	Noted
(xiv)	The Puducherry Pollution Control Committee and Regional Office of MoEFCC shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the Officer (s) of the PPCC / Regional Office of MoEFCC by furnishing the requisite data / information / monitoring reports whenever requested.	Will be complied with
(xv)	The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment	Will be complied with

	(Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.	
(xvi)	Any appeal against this EC shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Noted

**For Chemfab Alkalis Karaikal Limited,**



**Authorised Signatory**