



*Zero Tolerance to Corruption*  
**ENVIRONMENTAL PROTECTION AGENCY**  
CLIMATE CHANGE, FORESTRY, ENVIRONMENT  
&  
WILDLIFE DEPARTMENT  
GOVERNMENT OF KHYBER PAKHTUNKHWA



No. EPA/EIA/Lead-Smelting/ACM-Refineries/Hattar/26/104-16

Date: 13/01/2026

To

M. Mustafa Bin Talha  
M/S ACM Refineries Pvt. Limited,  
Plot No:36-A, Phase III, Industrial Estate Hattar, District  
Haripur.  
House No:10, Street No. 37, 7/1, Islamabad  
Contact# 0324-5351520.

Subject:

**DECISION ON THE EIA REPORT OF M/S ACM REFINERIES  
PVT. LIMITED, PLOT NO:36-A, PHASE III, INDUSTRIAL  
ESTATE HATTAR, DISTRICT HARIPUR.**

With reference to the subject cited above, please find enclosed herewith the Construction phase Environmental Approval/Decision Note on EIA Report of the subject project for your information and further implementation.

Moreover, **Schedule-X** must be submitted to this Agency within a month on Stamp Paper as an undertaking for the compliance of terms and conditions as mentioned in the Environmental Approval as well as mitigation measures proposed in the EIA Report. (Copy enclosed).

  
Deputy Director (Legal)

**Copy for information and necessary action to the;**

- Director (North), EPA Northern Directorate, Abbottabad.
- GIS Specialist/AD IT, EPA, HQ, Peshawar.

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3<sup>rd</sup> Floor, SDU Building, Khyber Road, Peshawar Cantt  
Telephone: 92 (91) 9210263, Fax: 92 (91) 9210280

**SCHEDULE-VII**  
**DECISION ON EIA**

**1. Name, address of proponent:** M. Mustafa Bin Talha  
M/S ACM Refineries Pvt. Limited,  
Plot No:36-A, Phase III, Industrial Estate  
Hattar, District Haripur.  
House No:10, Street No. 37, 7/1, Islamabad  
Contact# 0324-5351520.

**2. Description of project.** The project **M/S ACM Refineries Pvt. Limited** is located at Plot No. 36-A, Phase III, Industrial Estate Hattar, District Haripur. The project involves recycling scrap lead-acid batteries to produce refined lead and red lead (lead oxide) for supply to various industrial sectors. The planned production capacity is 100 tons per day of lead and 12-15 tons per day of red lead using the Barton Pot Process. The facility will be developed on approximately 3 acres of land and will operate through three main stages comprising scrap pretreatment, smelting, and refining. Scrap pretreatment includes battery breaking, crushing, and sweating, followed by smelting in furnaces using coke, iron scrap, limestone, and other additives. Refining operations will include softening, alloying, and oxidation to achieve the desired purity and produce lead oxide. Water consumption is estimated at 500-1000 kg per day for the smelting unit and approximately 80 kg per hour for the lead oxide plant, with additional water used in wet scrubbers for exhaust gas treatment. Water will be sourced from groundwater or the industrial estate supply network. Domestic wastewater will be treated through a septic system, while scrubbing wastewater will be managed through sedimentation tanks for reuse or safe disposal. Solid waste will mainly consist of recyclable battery components, furnace slag, sludge from treatment systems, and domestic waste. The total power requirement is estimated at 1.5 MW, to be supplied through the WAPDA or industrial estate grid.

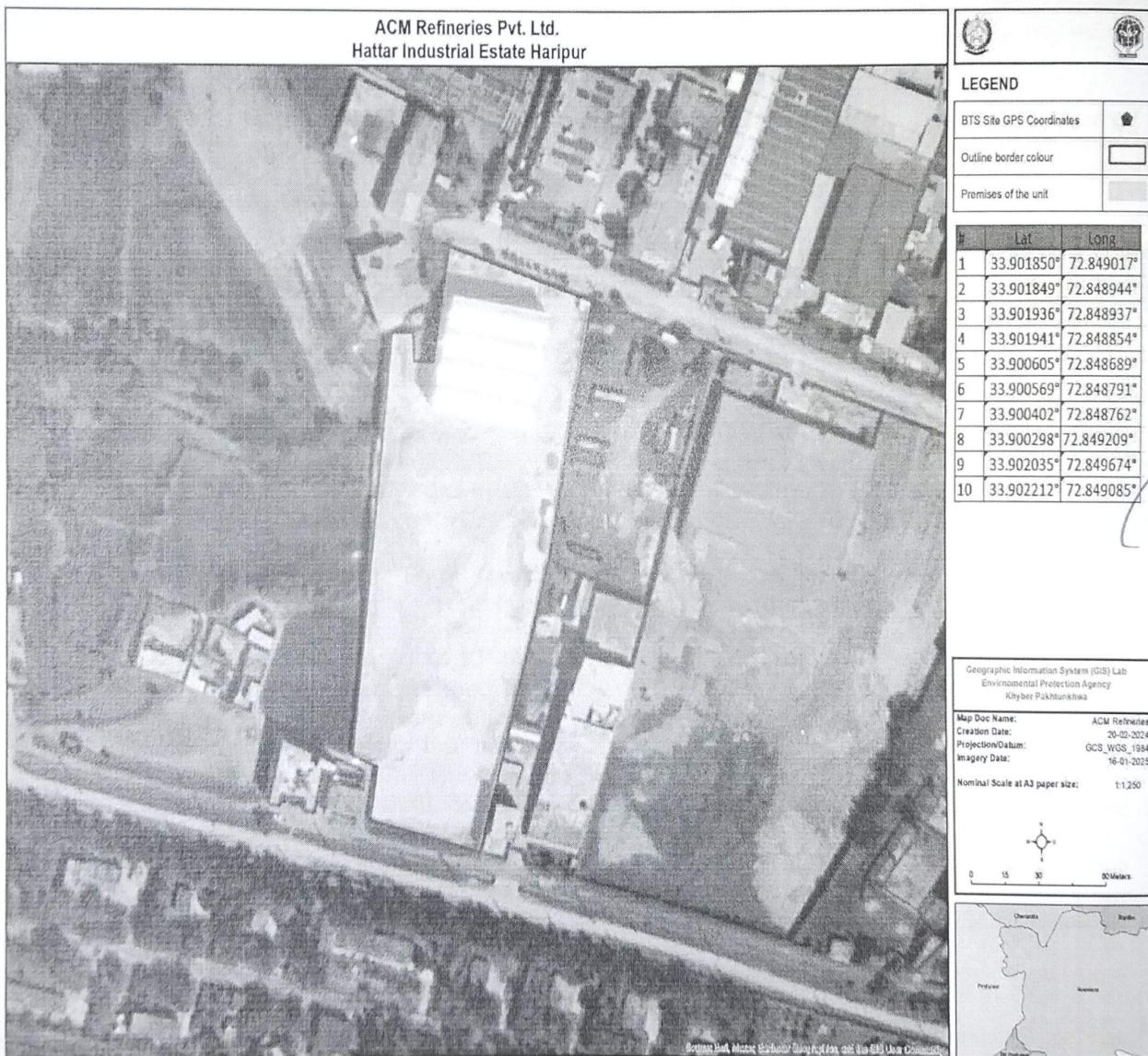
**3. Location of project.** Plot No. 36-A, Phase III, Industrial Estate Hattar, District Haripur.

**4. Date of filing of EIA.** 11/10/2024 (Diary No. 903)

**5. GPS Coordinates and Map.**

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#	Lat	Long
1	33.901850°	72.849017°
2	33.901849°	72.848944°
3	33.901936°	72.848937°
4	33.901941°	72.848854°
5	33.900605°	72.848689°
6	33.900569°	72.848791°
7	33.900402°	72.848762°
8	33.900298°	72.849209°
9	33.902035°	72.849674°
10	33.902212°	72.849085°



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6. After careful review and subsequent submission of administrative penalty i.e Rs.200,000/PKR, by the project proponent on 12-01-2026, the Environmental Protection Agency, Government of Khyber Pakhtunkhwa has decided to accord Construction Phase Environmental Approval on the Environmental Impact Assessment (EIA) Report of "**M/S ACM Refineries Pvt. Limited, Plot No:36-A, Phase III, Industrial Estate Hattar, District Haripur**" in accordance with the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021 and the decision taken under Agenda item No.06 of the 2<sup>nd</sup> Environmental Protection Council (EPC) meeting held on 11/09/2024 followed by Administrative Department Notification No. SO(Env)/CCFE&WD/4-2/2023/EPC/V-III dated 22/01/2025. Furthermore, the proponent shall have to obtain NOCs required from other departments under the prevailing laws/rules of the Provincial Government. This approval shall be governed by the following terms and conditions: -

- a) The proponent shall adopt all precautionary and mitigation measures recommended in the EIA Report as well as replies of the proponent submitted to this Agency and any un-anticipated impacts arising during the construction and operation phase of the project.
- b) Effluents and emissions from the unit, including those from generators and furnaces, shall be kept within the permissible limits of National Environmental Quality Standards (NEQS). The pollution control system must be properly maintained and operational, and if it fails to comply with NEQS, it shall be upgraded or replaced with the latest technology to ensure compliance.
- c) The proponent shall submit quarterly compliance report of the conditions of Environmental Approval along with emissions, effluents and noise analysis reports to EIA Cell from EPA Khyber Pakhtunkhwa certified laboratory.
- d) The proponent must conduct third-party environmental audits every year to assess compliance with environmental standards, and submit reports to this Agency's EIA Cell.
- e) The Wastewater Treatment Plant (WWTP) shall be fully operational with verified capacity to treat peak wastewater load prior to commissioning. A third-party performance verification report from an EPA-certified laboratory must be submitted to KP-EPA confirming compliance with NEQS. In case of any WWTP malfunction, all operations must cease immediately and may resume only after compliance is restored and re-verified by EPA.
- f) Water sprinkling shall be carried out where required to reduce the public nuisance caused by the dust emissions.
- g) The proponent shall establish permanent access to the sampling point for future monitoring and analysis of stack emissions.
- h) Emissions controls measures shall be adopted in case of repair/maintenance of the pollution control system of the unit. Moreover, when the pollution control system is out of order, the unit shall not be operated. Furthermore, proper record of filters shall be maintained.
- i) The treated effluents shall meet NEQS limits for lead, arsenic and other heavy metals and submit quarterly analysis report.
- j) Conduct quarterly stack emissions testing from EPA certified lab in the presence of EPA staff to verify whether emission control equipment/system (e.g bag filters, dust collector or wet scrubbers etc) complies with NEQS.
- k) The medical surveillance program shall be implemented as described. Quarterly Blood lead level (BLL) reports for all the employees certified by an approved occupational health clinic must be submitted to this Agency.

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- l) The proponent shall ensure on-site showers, PPE laundering and contamination control measures for lead and other heavy metals exposure management.
- m) The proponent shall submit quarterly compliance report from EPA Certified lab confirming the effectiveness of lead dust containment systems in the smelting areas.
- n) Personal Protective Equipment (PPE) like Masks, Fire Proof Jackets, Gloves, Goggles, Helmets, etc. must be provided to the workers and ensure its usage during the working hours. Furthermore, other health and safety Equipment like first aid box, signboards, etc. shall be installed/maintained inside the Factory premises/workplace as per standard practices /protocols.
- o) The proponent must provide training for personnel on safety protocols, environmental compliance, proper handling and emergency response procedures related to chemical storage and lead processing.
- p) Conduct regular health check-ups for workers exposed to the hazardous substances and maintain medical record to comply to health and safety regulations adopted by the KP EPA/other government departments.
- q) The proponent shall implement proper and safe storage measures for all chemicals and scrap batteries to ensure compliance with safety and environmental regulations.
- r) All lead-bearing materials and scrap batteries shall be stored exclusively within a designated, fully enclosed shed with impervious flooring and secondary containment barriers to prevent leaching or soil contamination.
- s) Batteries must be stored in designated, secure areas with secondary containment to prevent leaks or spills, and the storage areas must be regularly inspected.
- t) Proper confined area shall be allocated to the scrap/raw materials and the final product.
- u) The proponent must establish advanced wastewater treatment system, including ion exchangers and a precipitating mechanism for handling of strong acids and toxic heavy metals from smelting processes.
- v) The proponent must install a pH meter at the outlet of the wastewater treatment plant to monitor effluent quality.
- w) The proponent must conduct lead smelting process in a controlled environment with rotary furnaces equipped with afterburners and scrubbers to ensure safety and compliance with all relevant regulations.
- x) The water used in the process shall be re-used/recycled to maximum possible times. The effluent (if any) shall be properly treated before final discharge in compliance of the NEQS.
- y) Water meters shall be installed for keeping in check the sustainable water usage.
- z) The ground/surface water and soil shall be protected from all kind of pollutions/contaminations.
- aa) The proponent shall sign a contract with a certified vendor for solid waste and slag disposal.
- bb) Sufficient mitigations shall be adopted for the control of noise pollution.
- cc) The proponent shall install an updated fire extinguishing system and implement a fire protection plan as per the standards required by Rescue 1122.
- dd) The proponent shall ensure that Rescue 1122 is formally integrated into the Emergency Response Plan, including defined coordination mechanisms, communication protocols, and emergency contact arrangements, and that the same is kept updated at all times.
- ee) Proper parking area shall be identified for the vehicles inside the factory premises. Traffic congestion shall be avoided on main access road.

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- ff) A comprehensive CSR document, keeping in view quantum of project activities, having activities with proper funds allocation shall be shared with EPA before finalization for approval of EPA.
- gg) Plantation shall be carried out as per the submitted plantation plan with priority to indigenous/local species along with fund allocation for additional plantation on seasonal basis to counter carbon emissions.
- hh) For safe disposal of the residue/byproduct, proper contract shall be signed with the contractor and copy of the same shall be provided to this Agency.
- ii) As committed, electricity from WAPDA shall be utilized as the primary source of power.
- jj) Non-technical jobs shall be provided to the locals and preference shall be given to the locals in technical jobs. Moreover, maximum wages shall be paid to the workers as per prevailing Government rules.
- kk) Proper funds shall be allocated in the EMP for environmental improvement & awareness like celebration of environment days, facilitation in environmental monitoring, plantation etc. Activities shall be carried out in this regard in coordination with EPA KP.
- ll) Any future expansion, technological modification, or change in raw material/production line must be communicated to EPA and necessary approvals obtained prior to implementation.
- mm) The proponent shall ensure complete implementation of the Emergency Response Plan (ERP) as described in the EIA report.
- nn) A dedicated hazardous waste storage area with impervious flooring, covered roofing, proper ventilation and restricted access shall be developed at the site. Moreover, all hazardous waste shall be handled, labeled, stored, and transported in compliance with the Hazardous Substances Rules, and records must be maintained and made available during inspections.
- oo) The proponent shall ensure that sulfuric acid and other acids from battery processing are stored exclusively within a fully enclosed, dedicated storage hall equipped with impervious, paved flooring and appropriate secondary containment at all times.
- pp) The proponent shall display environmental approvals, safety instructions, and emergency contact numbers prominently on-site.
- qq) The proponent shall establish and disclose a grievance redress mechanism for addressing public complaints during the construction and operation phase of the project. Details shall be submitted to this Agency at the earliest.
- rr) The management shall be bound to adopt any additional mitigation measures suggested by EPA, as and when warranted, based on site inspections, complaints, or monitoring reports, during the construction and operation phases of the project.
- ss) The proponent shall install and maintain baghouse filters or equivalent technology on all lead smelting furnaces to capture lead particulate matter, with efficiency verified quarterly by an EPA-certified lab.
- tt) Continuous ambient air monitoring for lead concentrations shall be conducted at the site boundaries, with data submitted monthly to EPA, ensuring levels do not exceed NEQS limits.
- uu) Soil sampling for lead contamination shall be performed semi-annually around the facility, including storage and processing areas, with remedial actions required if levels exceed baseline or NEQS.
- vv) All lead dross and slag shall be collected, stored in sealed containers, and disposed of only through EPA-approved recyclers or hazardous waste facilities, with manifests submitted quarterly.
- ww) Workers handling lead must undergo mandatory baseline and quarterly blood lead level (BLL) testing, with immediate removal from exposure if BLL exceeds 10 µg/dL, and medical treatment provided as per occupational health standards.

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xx) Lead-specific training programs shall be conducted biannually for all employees, covering exposure risks, safe handling practices, and decontamination procedures, with attendance records maintained.

yy) The facility shall implement a lead dust suppression system, including vacuum cleaning with HEPA filters and wet methods for cleaning, prohibiting dry sweeping to minimize airborne lead.

zz) The proponent shall maintain a complete mass balance of lead input, production, recovery, waste generation, and disposal, and shall submit the same to this Agency on a quarterly basis. Any unaccounted loss of lead shall be treated as a serious violation.

aaa) All battery breaking, crushing, and lead handling operations shall be conducted under negative pressure with local exhaust ventilation connected to high-efficiency pollution control systems to prevent fugitive lead emissions.

bbb) No open-air handling, dry storage, or manual transfer of lead-bearing material shall be permitted at any stage of the process.

ccc) Separate clean and dirty zones shall be clearly demarcated within the facility, and cross-contamination between work areas, offices, and rest areas shall be strictly prevented.

ddd) Eating, drinking, and smoking shall be strictly prohibited in all process, storage, and lead-handling areas, and signage to this effect shall be prominently displayed.

eee) All waste acid, electrolyte, and acidic sludge generated from battery processing shall be neutralized prior to storage or disposal, and no acidic waste shall be disposed of in its original form.

fff) A dedicated decontamination facility, including change rooms, showers, and hand-wash stations, shall be provided, and all workers shall be required to decontaminate before leaving the premises.

ggg) Vehicles transporting lead, slag, or hazardous waste shall be covered, labeled, and decontaminated before exiting the facility to prevent off-site contamination.

hhh) A written lead exposure control plan, integrated with the occupational health and safety plan, shall be maintained and updated annually.

iii) In the event that ambient air, soil, or groundwater lead levels exceed NEQS or baseline values, operations shall be partially or fully suspended until remedial measures are implemented and verified by EPA KP.

jjj) Groundwater monitoring wells shall be installed around the site to test for lead leaching, with quarterly sampling and reporting to EPA, triggering immediate containment measures if contamination is detected.

7. The proponent shall be liable for correctness and validity of the information provided by the environmental consultant.

8. The proponent shall be liable for compliance of Rule 14, 15, 16, 18, 19, 20 and 21 of the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021 regarding approval, confirmation of compliance, entry, inspections and monitoring.

9. This approval accorded by the Agency under section 13 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, and shall be valid, for commencement of construction for a period of two years from the date of issuance.

10. This approval is accorded only for the construction phase of the project. The proponent will obtain separate approval for installation and operation of generators as well as operation of the lead smelting unit in accordance with Khyber Pakhtunkhwa Environmental Assessment Rules, 2021.

11. Any change in the approved project design shall be communicated to EPA, Khyber Pakhtunkhwa and shall be commenced after obtaining the approval.

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12. This approval shall be treated as null and void, if all or any of the conditions mentioned above is/are not complied with:
13. This approval does not absolve the proponent of the duty to obtain any other approval or clearance that may be required under any law in force.
14. There shall be no legal case pending in the courts against the project.
15. In exercise of the power under Section 13 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the undersigned is pleased to approve the EIA Report of "**M/S ACM REFINERIES PVT LIMITED, located at Plot No:36-A, Phase III, Industrial Estate Hattar, District Haripur, Khyber Pakhtunkhwa**" only with above terms and conditions mentioned.

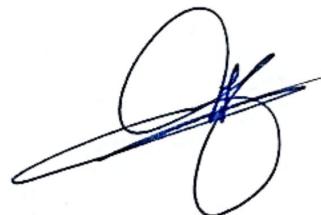
Dated: Peshawar 13/01/2026

Tracking/File. No. EPA/EIA/Lead-Smelting/ACM-Refineries/Hattar/26/ 1014-16

QR Code:



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DIRECTOR GENERAL,  
EPA, KHYBER PAKHTUNKHWA,  
3<sup>RD</sup> FLOOR, S.D.U. BUILDING,  
KHYBER ROAD PESHAWAR CANTT.