

Ref: Paushak/EHS/MoEF&CC/2024/ 48

Date: 19-11-2024

To,

Deputy Director General of Forests (C)
MoEF&CC, Integrated Regional Office, Gandhi Nagar,
A-Wing – 407 & 409, Aranya Bhawan,
Near CH-3 Circle, Sector-10A,
Gandhi Nagar - 382010

Subject: Submission of compliance report of Environment Clearance Conditions.

Ref:

(1) EC-F.No.J-11011/19/2017-IA II (I) Dated: 31/08/2018

Respected Sir,

With reference to about subject, we are herewith submitting six monthly **(April-24 to September-24)** compliance report on Environmental Clearance Conditions of EC-F.No. J-11011/19/2017-IA II (I) Dated: 31/08/2018.

Hope this is in line with the requirement of your good office.

Thanking you,
Yours Sincerely

For Paushak Limited



Ramakrishnan Iyer
(Site Head & VP- Manufacturing)

Paushak Limited

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Half Yearly Compliance Report**2024****01 Dec(01 Apr - 30 Sep)****Acknowledgement**

Proposal Name	Expansion of specialty Chemicals manufacturing unit by M/s Paushak Limited at Plot No.135,136,145,146,147,229 & 230,Village :Panelav,PO: Tajpura,Taluka:Halol,Dist:Panchmahal,State:Gujarat-Environment Clearance-reg.		
Name of Entity / Corporate Office	M/s Paushak Limited		
Village(s)	N/A		
District	PANCH MAHALS		
Proposal No.	IA/GJ/IND2/60354/2016	Category	Industrial Projects - 2
Plot / Survey / Khasra No.	N/A	Sub-District	N/A
State	GUJARAT	Entity's PAN	*****5006G
MoEF File No.	J-11011/19/2017-IA-II(I)	Entity name as per PAN	PAUSHAK LIMITED

Compliance Reporting Details

Reporting Year	2024
Remarks (if any)	
Reporting Period	01 Dec(01 Apr - 30 Sep)

Details of Production and Project Area

Name of Entity / Corporate Office M/s Paushak Limited

	Project Area as per EC Granted	Actual Project Area in Possession
Private	11.9108	11.9108
Revenue Land	0	0
Forest	0	0
Others	0	0
Total	11.9108	11.9108

Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	Phosgene	Others: Ton per Month	17/06/2024	1200	956.964	1200
2	Carbamyl Chloride	Others: Ton per Month	17/06/2024	28	10.253	28
3	Chloroformates	Others: Ton per Month	17/06/2024	400	398.449	400
4	Vinyl Chloroformates	Others: Ton per Month	17/06/2024	1	0.019	1
5	4 Nitrophenyl Chloroformate	Others: Ton per Month	17/06/2024	5	0.00	5
6	Urea	Others: Ton per Month	17/06/2024	200	0	200
7	Isocyanates	Others: Ton per Month	17/06/2024	300	18.852	200
8	Carbonates	Others: Ton per Month	17/06/2024	40	20.426	40
9	Chlorides/Acid Chlorides	Others: Ton per Month	17/06/2024	40	0.008	40
10	Carbamates	Others: Ton per Month	17/06/2024	40	0.271	40
11	Carbodiimides	Others: Ton per Month	17/06/2024	5	0.000	5
12	Nitriles	Others: Ton per Month	17/06/2024	1	0.000	1
13	Polymers	Others: Ton per Month	17/06/2024	1	0.002	1
14	Thiadiazole	Others: Ton per Month	17/06/2024	20	0.00	20
15	Esters	Others: Ton per Month	17/06/2024	209	0.00	209

Conditions

Specific Conditions

Sr.No.	Condition Type	Condition Details
1	MISCELLANEOUS	2. The Ministry of Environment, Forest and Climate change has examined the proposal for grant of environmental Clearance to the project for expansion of specialty chemicals total area of 119108 sqm at plot No. 135, 136, 145, 146, 147, 229 & 230, Village panelav, PO Tajpura, Taluka Halol. District Panchmahal (Gujarat).

PPs Submission: Complied

Present capacity is 2490 TPM by M/s Paushak Ltd. in a total area of 113521 sqm at Plot No. 135,136, 145, 147, 228, 229 and 230, Village Panelav and Gopipura, PO Tajpura, Taluka Halol, District Panchmahal (Gujarat). CCA Amendment No: AWH-128383 date of issue 14/08/23 and Valid up to 17/06/24. We have applied for CCA renewal application on dated 06.04.2024 and application accepted on dated 16.05.2024 Copy is attached as Annexure-01

Date:
23/11/2024

2	WASTE MANAGEMENT	<p>6.Para :5 Used Oil (2 MT/Yr.) will be sold to registered refiner. ETP Sludge (150 MT/Yr.), MEE Salt (250 MT/Y.) will be sent to TSDF of NECL, Nandesari for disposal. Discarded containers will be sold to registered vendors. Spent Carbon (5 MT/Yr.), Residue & Waste (20 MT/Yr.), Distillation Residue (60 MT/Yr.) & Distillation Residue (135 MT/Yr.) is Collected, Stored, Transported, given for co-processing in cement industries/RSPL, Panoli or disposal at CHWIF of NECL, Nandesari. Toxic Metal residue (from water purification plant) @ 10 MT/Yr. is Collected, Stored, Transported, and Disposed at TSDF of NECL, Nandesari/RSPL, and Panoli. Hydrochloric Acid (30 %) 1500 MT/M, FeCl₂ (18 MT/M), Recovered Mercury (7.2 MT/M) & Recovered Mercury Chloride (7.2 MT/M) Will be sold to authorized end users.</p>
<p>PPs Submission: Complied 1.Process organic residue and spent carbon sent to the authorized Co-processing/Pr-processing /Incineration site. 2.ETP sludge and evaporation salt is sent to the authorized TSDF site. 3.Spent Oil and Discarded drums are sold to recycler. 4.Hydrochloric acid is sold to authorized endusers. We have valid membership of the TSDF (M/s Maurya Environment), Pre-Processing site (M/s Geocleaner LLP and M/s Hazargo Industrial Pvt. Ltd) and Incineration site (M/s SEPPL and BEIL, Ankleshwar). Hazardous waste quantity is amended as per CCA Amendment No: AWH-128383 date of issue 14/08/23 and Valid up to 17/06/24. We have applied for CCA renewal application on dated 06.04.2024 and application accepted on dated 16.05.2024 Disposal of hazardous waste against CCA limited is attached as annexure-07 (From April-24 to Sept 2024 (MT) - Manifest copy is attached as annexure-08 TSDF ,Co-processing ,CHWIF Membership copy is attached as annexure-09</p>		<p>Date: 23/11/2024</p>
3	MISCELLANEOUS	<p>The project/activity is covered under category A of item 5(f) 'Synthetic organic chemicals industry' of the Schedule to the Environmental Impact Assessment Notification, 2006 and requires appraisal at Central level by the sectoral EAC in the Ministry.</p>
<p>PPs Submission: Complied Noted</p>		<p>Date: 23/11/2024</p>
4	MISCELLANEOUS	<p>The ToR for the project was granted on 26th May, 2017. Public hearing was conducted by the Gujarat Pollution Control Board on 16th February, 2018.</p>
<p>PPs Submission: Complied Noted</p>		<p>Date: 23/11/2024</p>
5	MISCELLANEOUS	<p>The proposal was considered by the Expert Appraisal Committee (Industry-2) in its 37th & 39th meeting held on 29-31 May, 2018 and 25-27 July, 2018 respectively. The project proponent and their consultant M/s Aqua-Air Environmental Engineers Pvt Ltd have presented EIA/EMP report as per the ToR. The Committee found the EIA/ EMP Report to be satisfactory and in consonance with the presented ToR. The Committee has recommended the proposal for grant of environmental clearance.</p>
<p>PPs Submission: Complied Noted</p>		<p>Date: 23/11/2024</p>
6	Statutory compliance	<p>a) Consent to Establish/Operate for the project shall be obtained from the State Pollution Control Board as required under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974</p>

<p>PPs Submission: Complied We have Obtained CCA amendment as order no: CCA as order no: AWH-103575, Date of Issue 19/08/2019 and validity period up to 17/06/2024. CCA Amendment as order no: AWH-110652, Date of Issue 15/12/2020 and validity period up to 17/06/2024. CCA Amendment No: A-115282 date of issue 20/10/21 and Valid up to 17/06/24. CCA Amendment No: AWH-128383 date of issue 14/08/23 and Valid up to 17/06/24. We have applied for CCA renewal application on dated 06.04.2024 and application accepted on dated 16.05.2024 Attached as annexure-10</p>		<p>Date: 23/11/2024</p>
7	<p>WATER QUALITY MONITORING AND PRESERVATION</p>	<p>b) As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises</p>
<p>PPs Submission: Complied ETP with MEE- ATFD facility is installed and operated with adequate efficiency. Approved quantity disposed to CETP. We have implemented 3 R principal and reducing the disposal quantity to CETP by Reuseing. ETP and MEE Details is attached as annexure-11</p>		<p>Date: 23/11/2024</p>
8	<p>Statutory compliance</p>	<p>c) Necessary authorization required under the Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016, Solid Waste Management Rules, 2016 shall be obtained and the provisions contained in the Rules shall be strictly adhered to</p>
<p>PPs Submission: Complied We have Obtained CCA amendment as order no: CCA as order no:AWH-103575,Date of Issue 19/08/2019 and validity period up to 17/06/2024. CCA Amendment as order no:AWH-110652,Date of Issue 15/12/2020 and validity period up to 17/06/2024. CCA Amendment No: A-115282 date of issue 20/10/21 and Valid up to 17/06/24. We have applied for CCA renewal application on dated 06.04.2024 and application accepted on dated 16.05.2024 Attached as annexure-10</p>		<p>Date: 23/11/2024</p>
9	<p>WATER QUALITY MONITORING AND PRESERVATION</p>	<p>d) National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.</p>
<p>PPs Submission: Complied We are a member of Common Effluent Treatment plant of M/s. Enviro Infrastructure Co. Ltd., Padra and not discharging our treated effluent directly. We are following the norms prescribed by Gujarat Pollution Control Board for CETP discharge in compliance with National Emission Standards for Organic Chemicals Manufacturing Industries We have obtained lifetime Membership of M/s. Enviro Infrastructure Co. Ltd., Padra from 23th June 2014 for the further treatment and final disposal of our treated effluent. GPCB analysis report of ETP Final outlet is attached CETP Membership and final ETP outlet results is attached as annexure-12</p>		<p>Date: 23/11/2024</p>
10	<p>AIR QUALITY MONITORING AND PRESERVATION</p>	<p>e) To control source and the fugitive emissions, suitable pollution control 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/SPCB guidelines.</p>
<p>PPs Submission: Complied Effective control measure has been installed e.g. Scrubbers, ducting, hood with blower and attached to scrubbers, etc., to control fugitive emission in the work area. We have installed closed handling system with tank, pumps, etc., instead of drums, carboys, etc., for major raw materials/products to control fugitive emission in the work area. Gaseous emissions are within the prescribed norms and is done through the stack having height as per the GPCB guidelines. Periodic Monitoring is carried out. Monitoring is conducted by NABL approved lab M/s. Prakruti Env. Engg , Vadodara (from April- 2024 to Sept- 2024) Work place monitoring ,Ambient air monitoring and Scrubber monitoring report is attached as annexure- 13</p>		<p>Date: 23/11/2024</p>
11	<p>MISCELLANEOUS</p>	<p>f) Solvent management shall be carried out as follows: i) Reactor shall be connected to chilled brine condenser system ii) Reactor and</p>

		solvent handling pump shall have mechanical seals to prevent leakages. iii) The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery iv) Solvents shall be stored in a separate space specified with all safety measures. v) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. vi) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. vii) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
<p>PPs Submission: Complied</p> <p>-Brine circulation is provided in the condenser to control the emission and prevent losses of solvents. 1.All the pumps engaged in the solvent transferring have double mechanical seals., 2.All the condenser is installed and provided with brine circulation to get maximum recovery. 3.Separate storage as per the guideline of PESO is provided for solvent storage. 4.Complied and ensuring with electrical dept of regular interval. 5.We have installed flameproof electrical equipment and dry run protection in the plant premises where solvents are handled. 6.All plant area having flame proof fittings as per zone classification. 7.We have licence from PESO for storage of solvent. Licence No. P/WC/GJ/15/2566 (P10023) valid up to 31-12-2026. 8.Regularly Earthing pit testing is carried out. PESO licence for storage of solvent and Precautions is attached as annexure-14</p>		Date: 23/11/2024
12	WATER QUALITY MONITORING AND PRESERVATION	g) Total fresh water requirement shall not exceed 201 cum/day to be met from ground water. Prior permission in this regard shall be obtained from the concerned regulatory authority.
<p>PPs Submission: Complied</p> <p>We have NOC for Ground water abstraction from CGWA on date 10/12/2020 and Valid up to 09/12/2023 NOC No. CGWA/NOC/IND/ORIG/2020/9603. We have also applied for NOC renewal on CGWA NOCAP portal dated 05/12/2023 Surface water connection from Sardar Sarovar Narmada Nigam Ltd. (SSNL) will be available vide permission granted to group company Alembic Pharmaceuticals Ltd. The Surface water connection from Sardar Sarovar Narmada Nigam Ltd. (SSNL) will be available vide permission granted to group company Alembic Pharmaceuticals Ltd. vide SSNL/IND//1211/106/Alembic/WMS dated 4th February, 2020. CGWA NOC and SSNL Agreement-Annexure-15</p>		Date: 23/11/2024
13	WATER QUALITY MONITORING AND PRESERVATION	h) Industrial/trade effluent shall be segregated into High COD/TDS and Low COD/TDS effluent streams. High TDS/COD shall be passed through stripper followed by MEE and ATFD (agitated thin film drier). Low TDS effluent stream shall be treated in ETP/RO to meet the prescribed standards.
<p>PPs Submission: Complied</p> <p>We have segregated both High and Low COD/TDS streams. Treatment plant is provided with the MEE, ATFD, ETP to meet the prescribed norms. Segregation of HTDS and LTDS Effluent stream photo is attached as annexure-16</p>		Date: 23/11/2024
14	MISCELLANEOUS	I) 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.
<p>PPs Submission: Complied</p> <p>Separate drainage is provided for storm water and is collected and discharged through the separate conveyance system. We are having separate storage tank at each plant for Industrial effluent and having acid proof tiling. Storm drainage system is attached as annexure-17</p>		Date: 23/11/2024
15	Risk Mitigation and Disaster Management	j) Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and solvent transfer through pumps.

<p>PPs Submission: Complied Hazardous chemicals are stored in tanks, drums, carboys and cylinder and Solvent is transferred through pumps. Raw material and Finished product drums were storage on drums rack. Flame arrestor are available on each solvent tank. Tank having flame arrestor image is attached as annexure-18</p>		<p>Date: 23/11/2024</p>
16	WASTE MANAGEMENT	k) Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.
<p>PPs Submission: Complied 1.Process organic residue and spent carbon sent to the authorized Co-processing/Pr-processing /Incineration site. 2.ETP sludge and evaporation salt is sent to the authorized TSDF site. Hazardous waste quantity is amended as per CCA Amendment No: AWH-128383 date of issue 14/08/23 and Valid up to 17/06/24. We have applied for CCA renewal application on dated 06.04.2024 and application accepted on dated 16.05.2024 Disposal of hazardous waste against CCA limited is attached as annexure-07 (From April-24 to Sep-24 (MT) - Manifest copy is attached as annexure-08 TSDF ,Co-processing ,CHWIF Membership copy is attached as annexure-09</p>		<p>Date: 23/11/2024</p>
17	Statutory compliance	l) The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.
<p>PPs Submission: Complied All transportation of the Hazardous Chemicals is made as per the Motor Vehicle Act, 1989 where as its handling is done as per the MSIHC Rules, 1989. The vehicles for transportation of raw material and products were parked at specified loading facilities where fire extinguishers along with the safety gazettes were provided. Spark arresters were fitted on all the vehicle entering inside factory. All the raw materials and products are transported through tanks or trucks by roadway. All the necessary precautions are taken while carrying out transport of the above materials as per the Hazardous Rules of transportation, Central Motor Vehicle Act-1988 and 1989. The unit showed the copies of MSDS, TERM card and proper Personal Protective Equipment (PPEs) given for hazardous waste to all the transporters. The unit has developed a checklist for the vehicles as per the Motor Vehicle Act and Rules.</p>		<p>Date: 23/11/2024</p>
18	AIR QUALITY MONITORING AND PRESERVATION	m) Fly ash should be stored separately as per CPCB guidelines so that it should not adversely affect the air quality, becoming air borne by wind or water regime during rainy season by flowing along with the storm water. Direct exposure of workers to fly ash & dust should be avoided.
<p>PPs Submission: Complied Dedicated dyke is prepared for storage of fly ash and same is being monitored timely. Fly ash dyke is attached as annexure-19</p>		<p>Date: 23/11/2024</p>
19	WASTE MANAGEMENT	n) The company shall undertake waste minimization measures as below :- i) Metering and control of quantities of active ingredients to minimize waste. ii) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. iii) Use of automated filling to minimize spillage iv) Use of close Feed system into batch reactors v) Venting equipment through vapour recovery system. vi) Use of high pressure hoses for equipment cleaning to reduce wastewater generation.
<p>PPs Submission: Complied We are monitoring of usage of raw materials. - We are re using our by-product HCl in certain processes. - We have installed auto filling system for drums and connected to scrubber. Photograph of Drum Filling System. - We have installed storage and day tanks of the raw material and the</p>		<p>Date: 23/11/2024</p>

<p>material is transferred through pumps/mechanized system. - All the reactors are connected with scrubbers through vent condensers with brine circulation facility. -Portable pump is used for the cleaning of the vessels to minimise waste water generation. - Centralized drum decontamination facility developed with 3R concept. Auto drum filling system, Portable pump is used for the cleaning of the vessels, Centralized drum decontamination facility photo is attached as annexure-20</p>		
20	GREENBELT	o) The green belt of at least 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.
<p>PPs Submission: Complied Green belt has already been developed in an area of 65308.9 sqm i.e. 57.5percentage of total area of the project. Green belt images attached as per annexure-35</p>		Date: 23/11/2024
21	PUBLIC HEARING	p) All the commitments made to the public during public hearing/consultation shall be satisfactorily implemented.
<p>PPs Submission: Complied All the commitments are fulfilled given during Public hearing. Compliance attached as per annexure-34</p>		Date: 23/11/2024
22	Corporate Environmental Responsibility	q) At least 1% of the total project cost shall be allocated for Corporate Environment Responsibility (CER) and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office.
<p>PPs Submission: Complied We are doing CER activity under CSR. Last year annual report is attached for CSR,CER compliance. Annexure- 21</p>		Date: 23/11/2024
23	AIR QUALITY MONITORING AND PRESERVATION	r) For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
<p>PPs Submission: Complied Flue gas emission are within the limit. Stack height are as per CCA. Acoustic enclosure are provided. DG set flue gas monitoring report and Noise monitoring report is attached as per annexure-22</p>		Date: 23/11/2024
24	Risk Mitigation and Disaster Management	s) The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.
<p>PPs Submission: Complied We have adequate Fire hydrant system to mitigate all possible fire hazards. All the portable fire extinguishers are maintained on monthly basis. Fire hydrant system and Fire extinguishers details is attached as annexure-23</p>		Date: 23/11/2024
25	Human Health Environment	t) Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
<p>PPs Submission: Complied Regular medical check-up is carried out of the workers. Medical Health check up based on Target organ analysis and area assessment. Conducting medical check-up for all employees once in six months. Data analysis and records in details. Medical counselling of analysis report. Check-up includes: Height, Weight, Body Mass Ratio, Colour Blindness, Vision, Blood pressure,</p>		Date: 23/11/2024

Haemoglobin, Urine test , SGPT and SGOT, Cholesterol are checked during medical check-up and records of the same are also maintained Medical report and OHC details is attached as annexure-24		
26	AIR QUALITY MONITORING AND PRESERVATION	u) Continuous online monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
PPs Submission: Complied We have installed online monitoring system for Boiler stack monitoring and connected to GPCB and CPCB Server. Night vision camera and flow meter available at effluent tanker loading area. Online monitoring system for Boiler stack monitoring and Night vision camera and flow meter available at effluent tanker loading area is attached as annexure-25		Date: 23/11/2024
27	MISCELLANEOUS	3.Production Quantity (MT/M), Phosgene : 1200 Carbamoyl Chloride : 28 Chloroformates : 400 Vinyl Chloroformates : 1 4 Nitrophenyl Chloroformate : 5 Urea : 200 Isocyanates : 300 Carbonates : 40 Chlorides/Acid Chlorides : 40 Carbamates : 40 Carbodiimides : 5 Nitriles : 1 Polymers : 1 Thiadiazole : 20 Esters : 209
PPs Submission: Complied Productions is under EC approved quantity The average production quantity is 1405.2 MT/M in the compliance period (April-24 to Sept-24) which is well within consented quantity (2490 MTM) Production data is submitted to GPCB through XGN portal in Form D2. -Attached as annexure-02 Production Quantity (MT/M), Phosgene : 956.96 , Carbamyl Chloride :10.25, Chloroformates : 398.45 , Vinyl Chloroformates :0.02, 4 Nitrophenyl Chloroformate :0.00, Urea : 0.00 , Isocyanates :18.85, Carbonates : 20.43 , Chlorides/Acid Chlorides :0.01 , Carbamates : 0.27 , Carbodiimides : 0.00 , Nitriles : 0.00, Polymers :0.002, Thiadiazole : 0.00, Esters : 0.00,		Date: 23/11/2024
28	GREENBELT	4.Existing land area is 59,554 sqm and additional 59,554 sqm of land shall be required for the proposed expansion. Green belt has already been developed in an area of 65308.9 sqm i.e. in 54.8% of total area of the project. The estimated project cost is Rs.75.5 crores including existing investment of Rs.5.5 crores. Total estimated project cost is Rs.70 crores for expansion Project. Total capital cost earmarked towards environmental pollution control measures is Rs.10 crores and the recurring cost (operation and maintenance) will be about Rs.1.10 crores per annum.
PPs Submission: Complied Green belt has already been developed in an area of 65308.9 sqm i.e. 57.5 percentage of total area of the project. Green belt photo is attached as annexure-35		Date: 23/11/2024
29	MISCELLANEOUS	5.There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc lies within 10 km distance.
PPs Submission: Complied There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc lies within 10 km distance		Date: 23/11/2024
30	Statutory compliance	6.Para :1- Total fresh water requirement will be increased from 144 cum/day to 344 cum/day proposed to be met from the ground water.
PPs Submission: Complied We have NOC for Ground water abstraction from CGWA on date 10/12/2020 and Valid up to		Date: 23/11/2024

<p>09/12/2023 NOC No. CGWA/NOC/IND/ORIG/2020/9603. We have also applied for NOC renewal on CGWA NOCAP portal dated 05/12/2023. Surface water connection from Sardar Sarovar Narmada Nigam Ltd. (SSNL) will be available vide permission granted to group company Alembic Pharmaceuticals Ltd. The Surface water connection from Sardar Sarovar Narmada Nigam Ltd. (SSNL) will be available vide permission granted to group company Alembic Pharmaceuticals Ltd. vide SSNL/IND//1211/106/Alembic/WMS dated 4th February, 2020. Average water consumption is 315.2 m3/day (surface water from Sardar Sarovar Narmada Nigam Ltd. (SSNL)) Monthly Water consumption data is submitted to GPCB through XGN portal in Form D2. CGWA NOC and SSNL Agreement-Annexure-03 Water consumption data is submitted to GPCB through XGN portal in Form D2. -Attached as annexure-02</p>		
31	WASTE MANAGEMENT	<p>6.Para :2-Total effluent generation will be increased from 95 cum/day to 178.5 cum/day, which includes 138.5 cum/day due to industrial operations and 40 cum/day from domestic side. The industrial wastewater of 138.5 cum/day shall be treated in RO/ MEE/ ATFD and treated effluent of 103 cum/day would be recycled. Existing treated waste water of 65 KLD would be sent to CETP of M/s Enviro Infrastructure Co.. Ltd, Umaraya, Vadodara (Gujarat) for final disposal.</p>
<p>PPs Submission: Complied Total average effluent generation is 49.98 m3/day (STP and ETP) From the total wastewater generated, treated effluent of 65 KLD is sent to CETP- EICL, Padra Total average 23.27 KL Treated STP water used for gardening purpose. Total average ETP effluent discharge during compliance period is 17.92 m3/day through dedicated tanker. We have obtained lifetime Membership of M/s. Enviro Infrastructure Co. Ltd., Padra from 23th June 2014. Month wise effluent generation is attached as annexure- 04</p>		<p>Date: 23/11/2024</p>
32	MISCELLANEOUS	<p>6.Para :3- Power requirement will be increased from 1200 KW to 3000 KW, which would be met from State Power Distribution Corporation Limited. Existing unit has 3 Nos. DG sets of 620 kVA, 325 kVA & 125 kVA capacities. One more DG Set of 1000 kVA would be installed and kept as standby. Stack height of 15 m will be provided to the proposed DG set as per CPCB norms.</p>
<p>PPs Submission: Complied Currently, D G set of 625 KVA and 2 Nos 1500 KVA is under operation and thus, Power consumed is within the consented quantity -Stack Height 625 KVA DG set: 30 meter -Stack Height 1500 KVA DG set: 30 meter Monthly energy consumption data is submitted to GPCB through XGN portal in Form D2 Remarks: We have removed 325 KVA and 125 KVA DG set. We are having CCA No: A - 115282 of 2 sets of 1500 KVA DG set and 1 nos. of 625 KVA DG set from GPCB vide letter no: GPCB/CCA-PN-155(8)/ID19007/Dt:27/10/2021 and Valid up to 17/06/24,We have applied for CCA renewal application on dated 06.04.2024 and application accepted on dated 16.05.2024 is attached as annexure- 05</p>		<p>Date: 23/11/2024</p>
33	Statutory compliance	<p>6.Para :4 .Existing unit has one boiler of 3 TPH capacities. One more coal fired boiler of 10 TPH capacity will be installed to cater to the proposed expansion. Electrostatic Precipitator with adequate stack height will be provided to the proposed boiler to control the particulate emissions within statutory limit of 115 mg/Nm3. Adequate scrubbers will be provided to control process emissions.</p>
<p>PPs Submission: Complied Currently, one boilers of 3 TPH LDO based and Out of 10 TPH company is installed one boilers of 3 TPH Coal base capacity with adequate Air Pollution Control Measures. We have installed Dust collector, Bag filter and Alkali scrubber before the 30 Mtrs. stack of the coal fired boiler to control emission of the particulate matter as well as SOX emission. OCEMS is attached for online monitoring of flue gas emission and connected to CPCB and GPCB Server. Bi-Monthly monitoring of stack has been conducted by NABL approved lab M/s. Prakruti Env. Engg , Vadodara (from April -2024 to Sept- 2024). Particulate emissions are within the prescribed limits. Analysis report is</p>		<p>Date: 23/11/2024</p>

attached as annexure- 06

General Conditions

Sr.No.	Condition Type	Condition Details
1	Statutory compliance	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://moef.nic.in . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional office of the Ministry.
PPs Submission: Complied Advertisement had been given in local newspapers regarding EC accordance of the project proposed		Date: 23/11/2024
2	Statutory compliance	The project authorities must strictly adhere to the stipulations made by the state Pollution Control Board (SPCB), State Government and/or any other statutory authority.
PPs Submission: Complied Noted		Date: 23/11/2024
3	Statutory compliance	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry. In case of deviations or alterations in the project proposal from those submitted to this Ministry, a fresh reference shall be made to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
PPs Submission: Complied Noted		Date: 23/11/2024
4	AIR QUALITY MONITORING AND PRESERVATION	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one stations is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.
PPs Submission: Complied We have selected the location for the ambient air monitoring point as covers major manufacturing activities of the site. 03 locations have been identified for monitoring of ambient air quality. Ambient Air Quality Sampling location and Station images is attached as annexure-26		Date: 23/11/2024
5	AIR QUALITY MONITORING AND PRESERVATION	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be complied with.
PPs Submission: Complied All the emissions are within the standards prescribed by the NAAQS. Regular Monitoring and analysis is carried out. Monitoring is carried out by NABL approved lab ,Report is attached as Annexure-27		Date: 23/11/2024
6	Noise Monitoring & Prevention	The overall noise levels in and around the plant area shall be kept

		well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
<p>PPs Submission: Complied</p> <p>The overall noise level in and around the plant area has been maintained within the standards (75 dB) by providing noise control measures including acoustic hoods, enclosures etc. on all sources of noise generation Regular monitoring is carried out to check and maintain it. Report is attached as Annexure-28</p>		<p>Date: 23/11/2024</p>
7	WATER QUALITY MONITORING AND PRESERVATION	The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.
<p>PPs Submission: Complied</p> <p>Being Chemical Company, Artificial recharge to ground water is not permitted. However, Company has constructed recharge wells in nearby Region under CSR activity.</p>		<p>Date: 23/11/2024</p>
8	Human Health Environment	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. Training to all employees on handling of chemicals shall be imparted.
<p>PPs Submission: Complied</p> <p>Training is imparted to all the employees regarding DISH approved and Pre-employment and routine periodical medical examinations for all employees are done. Medical report and OHC details is attached as annexure-24 Handling of Hazardous Chemicals - 111A (DISH Approved) training glimpse is attached as annexure-29</p>		<p>Date: 23/11/2024</p>
9	Risk Mitigation and Disaster Management	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing shall be implemented.
<p>PPs Submission: Complied</p> <p>1. We have preparer Environment impact assessment register for each and every activity and analysed the impact of activities on environment and take precautionary measures. 2. We have Fixed and Portable gas detector. 3. Work Place Monitoring is carried out. 4. Ambient air monitoring is carried out. 5. Company having ISO:14001 Certificate, Responsible care certification. 6. Company having Onsite emergency Plan. Fixed and Portable gas detector ,ISO 14001 certificate ,RC certificate is attached as annexure-30</p>		<p>Date: 23/11/2024</p>
10	Corporate Environmental Responsibility	The company shall undertake all measures for improving socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villagers, administration and other stake holders. Also eco-developmental measures shall be undertaken for overall improvement of the environment.
<p>PPs Submission: Complied</p> <p>CSR and eco-development activities are being carried out by the company. Activity attached as annexure-31</p>		<p>Date: 23/11/2024</p>
11	MISCELLANEOUS	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

<p>PPs Submission: Complied Separate Environment Management Cell has been formed with necessary equipment and qualified EHS staff. We have established an environment laboratory for monitoring. List of equipment and photo of Laboratory is attached as annexure-32</p>		<p>Date: 23/11/2024</p>
12	MISCELLANEOUS	<p>The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.</p>
<p>PPs Submission: Complied The funds earmarked for environment management/ pollution control measures are utilized in the same only. No fund is diverted for any other purpose</p>		<p>Date: 23/11/2024</p>
13	Statutory compliance	<p>A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parisad/ Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.</p>
<p>PPs Submission: Complied Noted</p>		<p>Date: 23/11/2024</p>
14	Statutory compliance	<p>The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.</p>
<p>PPs Submission: Complied Submitted compliance report of every six months (Oct-23 to Mar-24) is submitted to Online Parivesh portal on dated 05-06-2024. Copy attached as annexure- 36</p>		<p>Date: 23/11/2024</p>
15	Statutory compliance	<p>The environmental statement for each financial year ending 31 st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional offices of MoEF&CC by e-mail.</p>
<p>PPs Submission: Complied Submitted Environmental Statement (Form V) to the GPCB office 23/04/2024 for FY 2023-24 Submitted copy of Form-V is attached as annexure- 33</p>		<p>Date: 23/11/2024</p>
16	Statutory compliance	<p>The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental clearance, if implementation of any of the above conditions is not found satisfactory.</p>
<p>PPs Submission: Complied Noted</p>		<p>Date: 23/11/2024</p>

17	Statutory compliance	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986, the Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 , read with subsequent amendments therein.
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PPs Submission: Complied Noted	Date: 23/11/2024
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Visit Remarks

Last Site Visit Report Date:	06/05/2024
Additional Remarks:	

Note: This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.