

ENVIRONMENTAL CLEARANCE COMPLIANCE REPORT

For

APRIL 2023 TO SEPTEMBER 2023

By: GULBRANDSEN PRIVATE LIMITED (Formerly known as Gulbrandsen Chemicals Pvt. Ltd.) On Coastal Highway, AT & PO : Mujpur Tal : Padra, Dist. : Vadodara, Gujarat 391440

HALF YEARLY ENVIRONMENT CLEARANCE COMPLIANCE REPORT

ENO. J-11011/490/2011-IA-II (I) dated 23.01.2014

FOR PERIOD FROM APRIL 2023 TO SEPTEMBER 2023

Sr.	Conditions	Compliance Status
No		
2	The Ministry of Environment and Forests has examined the application for the above project. It is noted that the existing plant had obtained an environmental clearance from this Ministry vide letter no. J-11011/257/2008-IA.II (I) on 23.11.2010.	Complied
	M/s. Gulbrandsen Chemicals Private Limited have proposed to expand their Chemical Unit (from 24,980.04 to 1, 45,685.04 MTPA) at Sy. No. 202 to 205, 265b, 266a, 266b, 285 to 294, 296	Till date expansion up to 95535 MTPA of production against the approval of 120705 MTPA for the proposed project.
	to 298, 321, 323, 326, 200, 199 Coastal Highways, Village Mujpur, Tehsil Padra, District Vadodara, Gujarat.	Production data of the last 6 months are enclosed herewith as ANNEXURE: 1 .
	The proposed expansion will be carried out in an area of 2.73 ha. Total plant area after the expansion will be 7.88 ha. No Forest land is involved.	Environment Clearance amendment for addition of new plots received on dated 27.03.2018. Now the total plot area is 104364 m ² . We have received CTE no. 92482 dated 15.05.2018 and CTO no. AW-104908 dated 24.12.2019 for increase in plot area.
	No Defense Installation, Biosphere Reserve, National Park/WildLife Sanctuary, Ecologically Sensitive Area is located within 10 km radius of the project site.	No Ecologically Sensitive Area is located within 10 km radius of the project site.
	Total cost of the project is Rs.50 crores. Rs. 1 crore and Rs.2 crores is earmarked towards the capital cost and recurring cost per annum towards the environmental protection measures.	Every year Adequate funds are allocated toward capital cost and recurring cost for environmental pollution control measures. The fund allocated for Environment management is not diverted to any other purpose.
	Rs. 23.20 lakhs is earmarked towards the CSR related activities for a period of 2013-16.	CSR contribution during 2013-16: INR 1,00,27,392 CSR contribution during Apr-23 to Sep-23: INR 50.69 Lakhs

Sr. No	Conditions		Compliance Status							
3		owing are the posed products.	details	of exis	sting and	Com	plied			
	Sr	Name of Product	Existing	Proposed	Total after expansion	Sr. No	Name of Product	Proposed	Expansion implemented	
			MTPA	MTPA	МТРА		Organometallic	MTPA 32700	MTPA 27000	-
	1	Organometallic	21836.04	32700	54536.04		compounds Polyethylene wax	20000	20000	4
		compounds	0.0	20000	20000.0	2	Polyethylene wax	20000	20000	
	2	Polyethylene wax	0.0	20000	20000.0	3	R&D Products Organometallic	25.0	25.0	
	3	R&D Products Organometallic Compounds/Organ ic/inorganic	0.0	25.0	25.00		Compounds/Organic/ inorganic chemicals			
	4	chemicals Aluminum Chloride (25%) (AICI3)	3144	48510	51654	4	Aluminum Chloride (25%) (AICI3)	48510	48510	
	5	Ethyl Iodide	0.0	19470	19470	5	Ethyl Iodide (C2H5I)	19470	0	1
		(C2H5I)					Total	120705	95535	1
		Total	24980.04	120705	145685.04					1
5	expa from Lim It is be p The ded The prov	power requir ansion is 2100 n the Madhya ited. noted that the provided for wid raw materials icated sheds to a Ventury caustic vided to collect ydrous aluminiu	KVA, w a Gujar adequat er disper s will l woid fug c scrubb t the un	which will at Vij e stack h rsion of e be store gitive emi ing syste ing syste	Il be met Company leight will missions. d in the issions. m will be	appr Com Ade disp Com Raw cont Com Since Anh there	are utilizing only 80 oved 2100 KVA pov oplied quate stack height h ersion of stack emise oplied materials stored in ainers to control fug oplied e September 2012 ydrous Aluminius efore now only T ected with this scru	ver requir as been p sions. a pucca w jitive emi , we h m Chlo in Tetra	provided for varehouses/ ssions. ave stoppe pride plant	r wider 'closed ed the t and
	han	orine scrubbing dle the emergen orine cylinder.				An e sucti	plied emergency chlorine on arrangement ha lle emergency situat	s already	v been provi	ided to

Sr. No	Conditions	Compliance Status
6	The water requirement after the proposed expansion is 459.85 m3/day (Existing: 358.03 m3/day; Expansion: 101.82 m3/day) which will be sourced from existing bore well and purchased RO water.	Complied Total water consumption is 204.3 m ³ /day (average) against approved quantity of water consumption 459.85 m ³ /day. Water is sourced from existing borewells and purchased RO water. Water consumption details are enclosed herewith as ANNEXURE : 3
	The existing industrial and domestic wastewater generation is 54.8 m3/day and 10.17 m3/day respectively. The wastewater generation from the proposed expansion is 4.5 m3/day. Out of 4.5 m3/day, the domestic effluent is 2 m3/day. This effluent will be treated in STP and reused for gardening purposes. The remaining wastewater (boiler – 0.5 m3/day and cooling – 2 m3/day) will be recycled and reused for domestic purposes. There will be no process wastewater generation due the proposed expansion.	Complied Total Industrial waste water generation Average 48.2 m³/day (≤ 52.05 m3/day as per latest consent) & Domestic waste water generation Average 11.74 m³/day (≤ 12.17 m3/day as per latest consent) Domestic wastewater is treated in STP and reused for gardening purposes. The treated domestic effluent from STP is used for gardening purposes inside plant premises. Details of wastewater are enclosed herewith as ANNEXURE : 4
7	It is noted that used oil will be sent to the registered recyclers. The other solid waste such as waste/residue containing oil, distillation residue, waste refractory, ETP sludge will be sent to TSDF at Nandesari and Ankleshwar, operated by Nandesari Environment Control Limited (NECL) and Bharuch Enviro Infrastructure Limited (BEIL) respectively. M/s. Gulbrandsen Chemicals Private Limited is a member to the said TSDFs.	 Complied Used oil is sent to the registered recycler M/s Suraj Barrel which is a CPCB authorized recycler. Company has taken membership of following landfill sites for disposal of landfill waste: NECL, Nandesari BEIL, Dahej
8	All Synthetic Organic Chemical Industries located outside the notified industrial area/estate are listed at S.N. 5(f) under category 'A' and appraised at Central level.	Noted
9	The proposal was considered by the Reconstituted Expert Appraisal Committee (Industry) in its 6th meeting held during 5-7th March 2013. The Committee recommended the proposal for environmental clearance subject to stipulation of specific conditions along with other environmental conditions. Public Hearing / Public Consultation meeting was conducted by the Gujarat Pollution Control Board on 16.8.2012.	Noted
10	Based on the information submitted by you, Presentation made by you and your consultant, M/s. EQMS India Private Limited,	Noted

Sr. No	Conditions	Compliance Status
	the Ministry of Environment and Forests hereby accords environmental clearance to the above project under the provisions of EIA Notification dated 14th September 2006 subject to strict compliance of the following Specific and General conditions:	

Sr. No	Conditions	Compliance Status	5			
A.	SPECIFIC CONDITIONS					
i.	Ambient air quality data should be collected as per NAAQS standards notified by the	Complied				
	Ministry on 18th November, 2009.	AAQ data are col notified by the M through a third par	linistry o	on 18 th 1	Novemb	er 2009
		Summary of AAQN	-			2
			Unit	Norms	Min.	Max.
		Particulate Matter (PM10)	µg/m3		44	87
		Particulate Matter (PM2.5)	µg/m3	60	18	34
		Oxides of Sulphur as SO2	µg/m3	80	10.8	17.5
		Oxides of Nitrogen as NO2	µg/m3	80	13.6	24.7
		Hydrogen	µg/m3	200		
		Chloride (HCl) Chlorine (Cl2)	ug/m2	100	BDL BDL	BDL BDL
		Ozone	μg/m3 μg/m3	100	BDL	BDL
		Lead	$\mu g/m3$	100	BDL	BDL
		CO	$\mu g/m3$	2	0.11	0.27
		Ammonia	µg/m3	400	BDL	BDL
		Benzene	μg/m3	5	BDL	BDL
		Benzo(a)Pyrene	ng/m3	1	BDL	BDL
		Arsenic	ng/m3	6	BDL	BDL
		Nickel	ng/m3	20	BDL	BDL
		Monthly AAQ Reports, NABL photographs of A station are enclosed	certifica mbient	Air Qual	laborat lity mo	tory & nitoring
ii.	Regular monitoring of Volatile Organic	Complied	a nerewit		NEXON	L.J
	Compounds (VOCs) should be carried out.	Monitoring of Vola is carried out mon the workplace.	0		+	· · ·
		Summary of VOC				
		PARAMETER		nit M	lin.	Max.
		Volatile Organic Compounds (VOC	E)	PM 0	.00	0.01
		Monthly Monitorir as ANNEXURE : 5 .		are enclo	osed her	ewith
iii.	Stack of adequate height should be installed	Complied.			1 (
	to oil fired boiler to disperse waste gases into atmosphere.	We are using Na Adequate height i CPCB / GPCB Stan	is provid			

Sr. No	Conditions	Compliance Status					
		Stack & APCM ANNEXURE :		are enclos	ed here	with as	
iv	Fugitive emissions in the work zone	Complied.					
	environment, product, raw materials storage area etc. should be regularly monitored. The emissions should conform to the limits imposed by SPCB.	Fugitive emissions are regularly monitored in plant					
		Summary of fu	gitive emise	Norms	pr-23 to Min.	Sep-23: Max.	
		HC1	mg/Nm3	5	0.2	1.6	
		C12	mg/Nm3	3	BDL	0.5	
		VOC	mg/Nm3	-	0.0	0.01	
v	Ventury Caustic scrubber should be provided to control process emissions.	Complied. All plant proce Caustic scrubbe					
		An emergency suction arrange handle emerger chlorine cylinde	ement has ncy situatio	already be	en prov	vided to	
		Summary of pr	ocess emiss	ions for A	pr-23 to	Sep-23.	
		PARAMETER	Unit	Norms	Min.	Max.	
		HCl	mg/Nm3	20	1.0	1.9	
		Cl2	mg/Nm3	9	BDL	BDL	
		Stack monitor enclosed herew				ails are	
vi	Total water requirement after the proposed	Complied.					
	expansion should not exceed 459.85 m3/day (Existing: 358.03 m3/day; Expansion: 101.82 m3/day) and prior permission should be	Total water (average) again	-				
	obtained from the concerned Authority.	(uveruge) ugun	list per lilis.		.00 1107	aay.	
		Company has Ground Water water for 95 m ³	Authority				
		NOC No: CC dated 12/06/20				23/7895	
vii	No process wastewater will be generated.	Complied.	1:1:1		. 1.	1-	
	The boiler and cooling tower blowdown water will be recycled and reused for	There is no add due to expansion					
	domestic purpose. Water quality of treated	within the pern	nissible limi	it.	U		
	effluent shall meet the norms prescribed by	All process wa					
	CPCB/SPCB.	effluent has be conforming to i			CL, CE.	ir atter	
viii	The company should obtain Authorization	Complied					
	for collection, storage and disposal of hazardous waste under the Hazardous						

Sr. No	Conditions	Compliance Status
	Waste (Management, Handling and Trans- Boundary Movement) Rules, 2008 and amended as on date for management of Hazardous wastes and prior permission from SPCB should be obtained for disposal of solid / hazardous waste in the TSDF. Measures should be taken for fire fighting facilities in case of emergency.	Company has taken Authorization vide CC&A AWH-129630 valid up to 30/06/2028 for collection, storage and disposal of hazardous waste. Adequate fire fighting systems like fire buckets, fire extinguishers, etc. provided near Hazardous waste storage areas.
ix	Solvent management should be as follows : Reactor should be connected to a chilled brine condenser system.	Complied. Reactors are connected with a chilled water condenser system as per requirement.
	Reactor and solvent handling pump should have mechanical seals to prevent leakages.	Complied Mechanical seal has been provided to the reactor and solvent handling pump to prevent leakage. Most of the solvent handling pumps are magnetic drive pumps.
	The condensers should be provided with sufficient Heat Transfer Area (HTA) and residence time so as to achieve more than 95% recovery.	Complied The condensers are provided with sufficient Heat Transfer Area (HTA) and residence time and >95% recovery is achieved.
	Solvents should be stored in a separate space specified with all safety measures.	Complied Solvents are stored in underground storage tanks. These tanks are approved by PESO.
	Proper earthing should be provided in all the electrical equipments wherever solvent handling is done.	Complied Proper earthing has been provided at all electrical equipment wherever solvent handling is done.
	Entire plant where solvents are used should be flame proof. The solvent storage tanks should be provided with a breather valve to prevent losses.	Complied Flame proof fittings have been installed as per Hazardous Area Classification in the plant.
x	As proposed, green belt should be developed in at least 33 % of the project area. Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO.	Complied Green belt is developed as per CPCB guidelines.
xi	Occupational health surveillance of the workers should be done on a regular basis and records maintained as per the Factories Act.	Complied. Health check up of all employees is carried out at regular intervals.
xii	All the commitments made to the public during the Public Hearing/Public Consultation meeting held on 16.8.2012 shall be satisfactorily implemented and a separate budget for implementing the same shall be	Complied. Company took all necessary actions to comply with the commitment made in the Public Hearing/Public Consultation meeting held on 16.08.2012 and compliance report submitted to the Ministry's

Sr. No	Conditions	Compliance Status
	allocated and information submitted to the Ministry's Regional Office at Bhopal.	Regional Office at Bhopal. Public Hearing compliance was also submitted with EC Six Monthly Compliance of Oct-13 to Mar-14 dated 25.04.2014 vide Letter GCPL/EHS/2014/01.
xiii	At least 5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on Public Hearing Issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program shall be ensured accordingly in a time bound manner.	Complied. The company undertakes various CSR activities in nearby villages on a regular basis. 5% of the total project cost was earmarked towards CSR within the given time. Details of CSR activities are enclosed as ANNEXURE:7.
xiv	The company shall provide housing for construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.	Contract persons were from nearby villages; so arrangement of housing facilities for them was not required at our site.

Sr. No	Conditions	Compliance Status
В	GENERAL CONDITIONS	
i	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board and the State Government.	Complied Company follows all stipulations made by the Gujarat Pollution Control Board and submits compliance of the same to GPCB.
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.	Noted & Complied Based on EC F.NO. J-110114902011-IA-II (I) dated 23.01.2014, obtained CTE order no: 55793 dated 08.08.2013 & CC&A Amendment vide order no W-62520 dated 09.07.2014. Company has taken various permissions through CTE & CTO amendments from GPCB as per rules and regulations. Details of all permissions are submitted in six monthly compliance reports on a regular basis. Find herewith details as ANNEXURE : 9 .
iii	At least four ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of PM10, PM2.5, SO2 and NOX are anticipated in consultation with the SPCB. Data on ambient air quality and stack emission shall be regularly submitted to this Ministry including its Regional Office at Bhopal and the SPCB/CPCB once in six months.	Complied We have installed Four Ambient Air Quality monitoring stations in downwind and upwind directions. Data on ambient air quality and stack emission are regularly submitted to this Ministry once in six months and to the SPCB on a monthly basis. AAQ Monitoring data & photographs of Ambient Air Quality monitoring stations are enclosed herewith as ANNEXURE : 5.

Sr. No	Conditions	Compliance St	tatus			
iv	Industrial wastewater shall be properly collected, treated so as to conform to the	Compiled.				
	dated 19th May, 1993 and 31st December, 1993 or as amended from time to time. The treated wastewater shall be utilized for plantation purpose.eW	All process water is Treated in ETP and treated effluent is discharged to EICL, CETP after conforming to inlet norms of CETP for further treatment and ultimate discharge into Mahi estuary. We have installed Multiple Effect Evaporator instead of single stage evaporator for more effective treatment of effluent.				
		Summary of tre for Apr-23 to Se		dustrial efflue	ent chara	cteristics
		Parameters	Unit	PERMISSIB LE LIMIT	Min.	Max.
		рН		5 to 9	6.36	8.52
		Temp 'C	'C	45	29	31
		TSS	mg/L	600	6	80
		Oil & Grease	mg/L	20	BDL	BDL
		Fluorides	mg/L	2	0.2	0.79
		Sulphides	mg/L	2	0.2	1.1
		Colour	pt/Co	-	30	80
		Ammonical Nitrogen	mg/L	50	3.4	4.3
		Free Ammonia	mg/L	5	1	1
		Copper	mg/L	2	BDL	BDL
		Zinc	mg/L	5	0.08	0.54
		BOD (05-Days)	mg/L	500	54	130
		COD	mg/L	2000	198	422
		Arsenic (as As)	mg/L	0.2	BDL	BDL
		Mercury (as Hg)	mg/L	0.001	BDL	BDL
		Lead (as Pb)	mg/L	0.2	BDL	BDL
		Cadmium (as Cd)	mg/L	2	0.04	0.17
		Hexavalent Chromium	mg/L	1	BDL	BDL
		Total Chromium (as Cr)	mg/L	2	BDL	BDL
		Nickel	mg/L	5	0.11	0.33
		Cyanide as CN	mg/L	0.2	BDL	BDL
		Phenolic Compound	mg/L	5	BDL	BDL
		Treated domesti plantation purpo Waste water disp	oses. posal q	uantity and a		
	The everall poice levels in and every duby	enclosed as AN	NEXUI	RE:4		
v	The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels	Complied. Noise level is n plant area. Nois have already be blowers.	e contr	ol measures li	ike acous	stic hood

Sr. No	Conditions	Compliance Sta	tus			
	should conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (nighttime).	Summary of ambi	ent noise Unit	level for A	Apr-23 t Min.	to Sep-23:
		Day Time	dB(A)	75.0	59	74
		Night Time	dB(A)	70.0	53	67
		Overall noise lev within the limit. ANNEXURE : 8.			-	
vi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Complied. Health check up regular intervals.	of all en	mployees	is carri	ed out at
vii	The company shall develop rain water harvesting structures to harvest the rain	Complied.				
	water for utilization in the lean season besides recharging the ground water table.	Company has cor and utilizes the sa				rainwater
		Company has a Mujpur village for				
viii	The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report. Further, the company must undertake socio-economic development activities in the surrounding villages like community development programmes, educational programmes, drinking water supply and health care etc.	Complied. Company has constructed protection measures the EIA/EMP rep Company also us development active Supporting Running I Skill devel Women en Environme Details of CSR active :7	res and sa ort. undertake vities in tl g Govern nealth cer opment p npowerm ental Sust	afeguards es various ne surrour ment heal nter in Mu project ent progra ainability	recomm s socio- nding vi th cente jpur vill	nended in -economic illages. er lage
ix	Requisite funds shall be earmarked towards capital cost and recurring cost/annum for environmental pollution control measures to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government. An implementation schedule for implementing all the conditions stipulated herein shall be submitted to the Regional Office of the Ministry at Bhopal. The funds so provided shall not be diverted for any other purpose.	Complied Every year Adec capital cost and pollution control Environment ma other purpose.	recurrin measure	g cost fo es. The fu	or envii ind alle	ronmental ocated for
x	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/representations, if any,	Complied Environment Clea stakeholders.	arance le	tters have	been s	sent to all

Sr.	Conditions	Compliance Status
No		-
	were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.	Company has also uploaded a clearance letter on the company website.
xi	The project proponent shall upload the status of compliance of the stipulated	Complied
	environmental clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent	The company has uploaded the status of compliance of the stipulated existing EC condition including results of monitored data on its website.
	to the Regional Office of the MoEF at Bhopal. The respective Zonal Office of CPCB and the SPCB.	Compliance report including results of monitoring data are being sent to Regional office MoEF, Regional office CPCB and State Pollution Board on a regular basis.
	The critical pollutant levels namely; PM10, PM2.5, SO2, NOx (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	Data w.r.t. AAQ monitoring, Stack monitoring & Hazardous waste stock and disposal are displayed near the main gate of the company in the public domain.
xii	The project proponent shall also submit six	Complied
	monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office of MOEF, the respective Zonal Office of CPCB and the SPCB. The Regional Office of this Ministry at Bhopal / CPCB / SPCB shall monitor the stipulated conditions	The company submits six monthly compliance reports including results of monitoring data of Environmental Clearance to all the concerned regulatory authorities on a regular basis.
xiii	The environmental statement for each	Complied
	financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent 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 conditions and shall also be sent to the respective Regional Office of the MOEF at Bhopal by e-mail.	The environmental statement for financial year 2022-2023 has been submitted to the state pollution control board with letter No. GPL/EHS/GPCB ID 21999/ES-2022-23 dated 26.06.2023 and also uploaded on the company website. Environment Statement for 2022-2023 is enclosed as ANNEXURE : 10 .
xiv	The Project Proponent shall inform the	Complied
	public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at Website of the Ministry of Environment and Forests at http://envfor@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	Advertisement of Environmental Clearance was published in English newspaper "THE TIMES OF INDIA" VADODARA edition dated 04.03.2014 & Guajarati newspaper "DIVYA BHASKAR"edition dated 04.03.2014.

Sr. No	Conditions	Compliance Status
	be in the vernacular language of the locality concerned and a copy of the same should be forwarded to the Regional office at Bhopal.	<section-header><section-header><section-header><section-header><section-header><section-header><section-header><section-header></section-header></section-header></section-header></section-header></section-header></section-header></section-header></section-header>
xv	Project authorities 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 the date of commencing the land development work.	The company had informed the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work.
11	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted
12	The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.	Noted
13	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 (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules,2016 and the Public (Insurance) Liability Act, 1991 along with their amendments and rules.	Complied Company fulfills all the applicable statutory requirements. Company has taken Authorization vide CC&A AWH-129630 valid up to 30/06/2028 for collection, storage and disposal of hazardous waste. Company has—taken PLI policy vide policy no L0222433 valid up to 31/12/2023 as per the Public Liability (Insurance) Act 1991. The same is enclosed herewith as ANNEXURE : 11 .



ENVIRONMENTAL CLEARANCE COMPLIANCE REPORT

For

APRIL 2023 TO SEPTEMBER 2023

By: GULBRANDSEN PRIVATE LIMITED (Formerly known as Gulbrandsen Chemicals Pvt. Ltd.) On Coastal Highway, AT & PO : Mujpur Tal : Padra, Dist. : Vadodara, Gujarat 391440

HALF YEARLY ENVIRONMENT CLEARANCE COMPLIANCE REPORT

F.NO.:J-11011/257/2008-IAII (I) dated 23.11.2010

FOR PERIOD FROM APRIL 2023 TO SEPTEMBER 2023

	Conditions			Compliance Status					
+	T 1	10.1.4		. 1-	. 1	Complied			
		Ministry of Er				Cor	nplied.		
		mined the ap							
0	Org	ano Metallic	Product	s/Other	Synthetic	Pro	posed 1903 m ² area	included	in existing pla
	Organic Chemicals Manufacturing Unit at					vironment Clearan		01	
		age Mujpur,					new plots received		
		0 11					-		a = 27.05.2010.1
		lodara, Gujara					total plot area is 10		
		res. Total land					have received CT		
15	515	00 m2 and ad	lditional	area req	uirement	and	CTO no. AW-1	04908 dat	ted 24.12.2019
f	for	proposed exp	oansion	will be	1903 m2.	inci	ease in plot area fo	or which w	ve already rece
		lowing produc					amendment as me		v
		nufactured:		Jrioude		120			
r	S.	Products	Existing	Proposed	Total	S.	Products	Proposed	Present status
	э. N	110000015	(MTPA)	(MTPA)	(MTPA)	N.		(MTPA)	of proposed
	1	Organometallic	7800.84	14035.2	21836.04			, ,	expansion
		Compounds				1	Organometallic	14035.2	11755
[2	Hot End Glass	0	1824	1824		Compounds	1824	1924
		Coating				2	Hot End Glass Coating Formulations	1824	1824
	2	Formulations	0	200	200	3	Cold End Glass	300	300
	3	Cold End Glass Coating	0	300	300	Πĭ	Coating Formulations		
		Formulations				4	Amyl Anthraquinone	960	0
	4	Amyl	0	960	960	Tot	al	17119.2	13879
		Anthraquinone							
	Tota	<u> </u>	7800.84	17119.2	24920.04	S.	Other Products	Proposed	Present status
						Ν		(MTPA)	of proposed
ļΓ	S.	Other Products	Existing	Proposed	Total	1	Anhydrous	3600	expansion 0
	N		(MTPA)	(MTPA)	(MTPA)		Aluminium Chloride	5000	
	1	Anhydrous	8400	3600	12000	2	Tin Tetra Chloride	0	0
		Aluminium Chloride				3	Metal Chloride	6000	0
	2	Tin Tetra	5075	0	5075	4	Tin Oxide	912	
	-	Chloride	00.0			5	Aluminium chloride (0	0
	3	Metal Chloride	0	6000	6000		25%)		
	4	Tin Oxide	0	912	912		(Alcl3)		
١ſ	5	Aluminium	3144	0	3144	6	Aluminium Chloride	6243	5130
		chloride (25%)					(30%) (Alcl3)		
		(Alcl3)	22.40	(040	0500	7	Aluminium Sulfate	1227	1227
	6	Aluminium Chloride (30%)	2340	6243	8583	11 ´	Solution	/	
		(Alcl3)				8	30% HCL	253	0
	7	Aluminium	103	1227	1330	9	Aluminium Bromide	2500	0
		Sulfate Solution				10	Sodium Bromide	25	0
	8	30% HCL	0	253	253	11	Sodium Bromate	7.5	0
١ſ	9	Aluminium	0	2500	2500	Tot		20767.5	6357
		Bromide		L		Pro	duction data are er	nclosed her	rewith as
	10	Sodium Bromide	0	25	25	AN	INEXURE: 1		
	11	Sodium Bromate	0	7.5	7.5		-		
	Tota	al	19062	20767.5	39829.5	1			

Sr. Conditions No	Compliance Status
	 Complied Venturi Caustic scrubber packed column scrubber has been provided to the Anhydrous Aluminium Chloride and Tin Tetra Chloride plant. Since September 2012, we have stopped manufacturing of Anhydrous Aluminium Chloride and therefore now only Tin Tetra Chloride plant is connected with this scrubber. As an improvement step we have eliminated NH₃ washing in Di Butyl Tin Oxide (DBTO) process and therefore NH₃ stripping is not required. However, Packed column with caustic spray system is provided for removal of acidic fumes for organometallic production. A flare has been provided in Alkyl for burning of vent gases during abnormal & continuous operation as well as during abnormal & emergency situation. Flammable gases are routed through quenching system. Stacks of adequate height have been provided. Total water consumption is 204.3 m³/day (average) (<358 m³/day). Water consumption details are enclosed as ANNEXURE : 3 Total waste water generation is 48.2 m³/day (average) (< 188.902 m³/day). The treated domestic effluent from STP is used for

Sr. No	Conditions	Compliance Status
		- BEIL, Ankleshwar - SEPPL, Kutch -Banas, Dahej
4	The public hearing of the project was held on 26 th May, 2009.	Noted
5	The synthetic organic chemical (bulk drugs and intermediates) manufacturing units located out side the notified industrial area are listed at serial no 5(f) of schedule of EIA Notification , 2006 under "A" category and apprised at central level.	Noted
6	The proposal was considered by the Expert Appraisal Committee (Industry-2) in 1st, 7th and 14th meeting held during 24th -25th July 2009, 15th -16th January, 2010 and 16th 17th September 2010, respectively. The Committee recommended the proposal for environment clearance.	Noted
7	Based on the information submitted by the project proponent, the Ministry of Environment and Forest here by accords environmental clearance to above project under the provisions of EIA Notification dated 14th September 2006, subject to the compliance of the following specific and General Conditions.	Noted & Complied

No	Conditions	Compliance Stat	us			
Α	SPECIFIC CONDITIONS	ł				
i	Efforts shall be made to reduce RSPM levels in the ambient air and a time bound action plan shall be submitted. At no time, the emission levels shall go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the	d As per prevailing wind directions, AAQM is out on regular basis at four locations in the The emission level of all parameters is wi prescribed standard as per National Amb Quality Standards. Monitoring result e it herewith as ANNEXURE: 5 which show RSPM is within limit.		ns in the s is wit l Ambie esult en h show	e plant. hin the ent Air nclosed vs that	
	desired efficiency.	In the plant air p connected with scrubber, Activate Control systems adequate height. herewith as ANN the parameters are All pollution co- monitored to che maintenance is carr	pollution ed carbo are atta Monito EXURE: within pontrol s ck their	control on bed, ched wit oring res 6 which ermissible ystems	system etc. Po th a st sults en shows e limit. are re	ns like ollution tack of nclosed that all
ii	Ambient air quality data shall be collected as per NAAQS standards issued by the Ministry vide G.S.R. No. 826(E) dated 16 th	pient air quality data shall be collected Complied er NAAQS standards issued by the Ambient Air Quality Monitoring is carried ou stry vide G.S.R. No. 826(E) dated 16 th four locations in the plant premises on a reg ember, 2009. On-line monitoring of Cl ₂ basis.				
	shall be ensured.		A data fa			
		Summary of AAQ	-	r Apr-23	to Sep-2	3:
			Unit			
		Summary of AAQI PARAMETER Particulate Matter	Unit µg/m3	r Apr-23 Norms	to Sep-2 Min.	3: Max.
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2	Unit µg/m3	r Apr-23 t Norms 100	to Sep-2 Min. 44	3: Max. 87
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2	Unit μg/m3 μg/m3	r Apr-23 t Norms 100 60	to Sep-2 Min. 44 18	3: Max. 87 34
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl)	Unit μg/m3 μg/m3 μg/m3 μg/m3	r Apr-23 (Norms 100 60 80 80 200	to Sep-2 Min. 44 18 10.8 13.6 BDL	3: Max. 87 34 17.5 24.7 BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2)	Unit μg/m3 μg/m3 μg/m3 μg/m3 μg/m3	r Apr-23 Norms 100 60 80 80 200 100	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL	3: Max. 87 34 17.5 24.7 BDL BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone	Unit μg/m3 μg/m3 μg/m3 μg/m3 μg/m3 μg/m3	r Apr-23 (Norms 100 60 80 80 200 100 100	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL	3: Max. 87 34 17.5 24.7 BDL BDL BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone Lead	Unit μg/m3 μg/m3 μg/m3 μg/m3 μg/m3 μg/m3 μg/m3	r Apr-23 Norms 100 60 80 80 200 100 100 1	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL BDL BDL	3: Max. 87 34 17.5 24.7 BDL BDL BDL BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone Lead CO	Unit μg/m3	r Apr-23 (Norms 100 60 80 80 200 100 100 1 2	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL BDL 0.11	3: Max. 87 34 17.5 24.7 BDL BDL BDL BDL 0.27
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone Lead CO Ammonia	Unit μg/m3	r Apr-23 Norms 100 60 80 80 200 100 100 1 2 400	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL BDL 0.11 BDL	3: Max. 87 34 17.5 24.7 BDL BDL BDL BDL 0.27 BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone Lead CO Ammonia Benzene	Unit μg/m3	r Apr-23 (Norms 100 60 80 80 200 100 100 100 1 2 400 5	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL 0.11 BDL BDL BDL	3: Max. 87 34 17.5 24.7 BDL BDL BDL BDL 0.27 BDL BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone Lead CO Ammonia Benzene Benzo(a)Pyrene	Unit μg/m3 μg/m3	r Apr-23 Norms 100 60 80 80 200 100 100 100 1 2 400 5 1	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL BDL BDL BDL BDL BDL	3: Max. 87 34 17.5 24.7 BDL BDL BDL BDL BDL BDL BDL BDL
		Summary of AAQI PARAMETER Particulate Matter (PM10) Particulate Matter (PM2.5) Oxides of Sulphur as SO2 Oxides of Nitrogen as NO2 Hydrogen Chloride (HCl) Chlorine (Cl2) Ozone Lead CO Ammonia Benzene	Unit μg/m3	r Apr-23 (Norms 100 60 80 80 200 100 100 100 1 2 400 5	to Sep-2 Min. 44 18 10.8 13.6 BDL BDL BDL 0.11 BDL BDL BDL	3: Max. 87 34 17.5 24.7 BDL BDL BDL BDL 0.27 BDL BDL

Sr. No	Conditions	Compliance Status
		The emission level of all parameters is within the prescribed standard as per National Ambient Air Quality Standards. Monthly AAQ Monitoring data, Monitoring Reports, NABL certificate of laboratory & photographs of Ambient Air Quality monitoring station are enclosed herewith as ANNEXURE: 5
		Company has installed online AAQM stations for Cl_2 monitoring in plant premises.
iii	Venturi caustic scrubber packed column type scrubber shall be provided to anhydrous aluminum chloride and Tin tetra chloride plant to collect un-reacted fumes of anhydrous aluminum chloride, TTC and Chlorine gas. Ammonical stripping system for removal of dissolved Ammonical Nitrogen and packed column with caustic spray system for removal of acidic fumes shall be provided to Organometallic production plant. Caustic scrubber packed column type scrubber shall be provided to collect	Complied Venturi Caustic scrubber packed column scrubber has been provided to the Anhydrous Aluminium Chloride and Tin Tetra Chloride plant. Since September 2012, we have stopped manufacturing of Anhydrous Aluminium Chloride and therefore now only Tin Tetra Chloride plant is connected with this scrubber. As an improvement step we have eliminated NH ₃ washing in Di Butyl Tin Oxide (DBTO) process and therefore NH ₃ stripping is not required. However Packed column with caustic spray system is
	unreacted fumes.	provided for removal of acidic fumes for organometallic production.
	A dedicated emergency Chlorine scrubber along with proper suction arrangement shall be installed separately to handle emergency situation in case of leakage from Chlorine cylinder.	An emergency chlorine scrubber along with proper suction arrangement has been provided to handle emergency situation in case of leakage from chlorine cylinder.
iv	Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. All the proposed products shall be handled in closed circuit. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits prescribed by the GPCB. A flare system shall be provided to control accidental release of gaseous system and all the flammable gases shall be routed through quenching system.	 strategic locations to know the real time fugitive emissions in the plant. These sensors are connected with PLC and we can check concentration of gases directly from PLC at any time. If at any point concentration of any gas is more than TLV, an audio alarm is generated and precautionary measures to be taken on an immediate basis. These sensors are in operation on a continuous basis. Raw materials and Finished products are stored in pucca warehouse to control dust & fugitive emission during loading/unloading and storage.
		A flare has been provided in Alkyl for burning of vent gases during normal & continuous operation as well as during abnormal & emergency situations.

Sr. No	Conditions	Compliance Sta	tus					
		Flammable gases system.	are rout	ed throug	h a qu	enching		
		In addition, Work being carried out a regular basis to	through t	hird party	consul	0		
v	For further control of fugitive emission, following steps shall be followed :a. Closed handling system shall be provided for chemicals.	Complied Closed handling chemicals.	g system	n is pro	vided	for all		
	b. Reflux condenser shall be provided over reactor.	Complied Distillation colur condensers.	nns are	connecte	d with	reflux		
	c. System of leak detection and repair of pump/pipeline based on preventive maintenance.	Complied Mechanical seal t leakage and maintenance is d solvent handling j	fugitive one as p	emission er schedu	n. Pre le. Mos	eventive t of the		
	d. The acids shall be taken from storage tanks to reactors through closed pipeline. Storage tanks shall be vented through trap receiver and condenser operated on chilled water.	Complied Acid storage ta scrubber system.	ınk vent	s are co	onnecte	d with		
	e. Cathodic protection shall be provided to the underground solvent storage tanks.	Complied Cathodic protec underground solv			provid	ed for		
vi	Stacks of adequate height shall be provided to the boiler, thermic fluid	Complied						
	heaters, DG sets, process vents and flare stack respectively as per CPCB/GPCB standards. Acoustic enclosure shall be	All existing stack height is as per CPCB/GPCB standards. Acoustic enclosure has also been provided to the DG sets to control the noise level.						
	provided to the DG sets to mitigate the noise pollution	Summary of am Sep-23:	bient no	ise level	e level for Apr-23 to			
		Duration	Unit	Norms	Min.	Max.		
		Day Time	dB(A)	75.0	59	74		
		Night Time	dB(A)	70.0	53	67		
		Overall noise leve within the limit. I ANNEXURE : 8.						
vii	The company shall upload the status of compliance of the stipulated	Complied						
	environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the	The company compliance of the on its website.	-					

Sr. No	Conditions	Compliance Status
	respective Zonal office of CPCB and the State Pollution Control Board. The levels of SPM, RSPM, SO2, NOx, HCl and VOC in ambient air and emissions from the stacks shall be monitored and displayed at	Compliance report including results of monitoring data are being sent to Regional office MoEFCC, Regional office CPCB and State Pollution Board on a regular basis.
	a convenient location near the main gate of the company and at important public places.	Data w.r.t. AAQ monitoring, Stack monitoring & Hazardous waste stock and disposal are displayed near the main gate of the company in the public domain.
viii	Solvent management shall be as follows : a. Reactor shall be connected to chilled brine condenser system	Complied Reactors are connected with a chilled water condenser system as per requirement.
	b. Reactor and solvent handling pumps shall have mechanical seals to prevent leakages.	Complied Mechanical seal has been provided to the reactor and solvent handling pump to prevent leakage. Most of the solvent handling pumps are magnetic drive pumps.
	c. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery	Complied The condensers are provided with sufficient Heat Transfer Area (HTA) and residence time and >95% recovery is achieved.
	d. Solvents shall be stored in a separate space specified with all safety measures.	Complied Solvents are stored in u/g storage tanks. These tanks are approved by PESO.
	e. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	Complied Proper earthing has been provided at all electrical equipment wherever solvent handling is done. Also solvent carrying piping is connected with earthing.
	f. Entire plant shall be flame proof. The solvent storage tanks shall be provided with a breather valve to prevent losses.	Complied Flame proof fittings have been installed as per Hazardous Area Classification in the plant.
ix	Total ground water requirement shall not	Complied.
	exceed 358 KLD after expansion and prior permission for the withdrawal of ground water shall be obtained from CGWA/SGWB. Total effluent generation shall not increase 188.902 KLD after expansion and properly treated in the ETP and shall meet the CETP	Company has obtained NOC from the Central Ground Water Authority for extraction of ground water for 95 m ³ /day. NOC No: CGWA/NOC/IND/REN/3/2023/7895 dated 12/06/2023 valid up to 11/06/2026.
	inlet norms specified by the Gujarat Pollution Control Board. Low volume & high COD/TDS wastewater shall be concentrated in multi-effect evaporator (MEE) followed by incinerator to achieve	Total industrial waste water generation is 48.2 m^3/day (\leq 52.05 m3/day as per latest consent) & Domestic waste water generation is 11.74 m^3/day (\leq 12.17 m ³ /day as per latest consent)
	"Zero discharge". However high volume & low COD/TDS effluent shall be treated in	Treated effluent is discharged to EICL CETP after conforming to inlet norms of CETP. We have

Sr. No	Conditions	Compliance S	tatus			
	ETP and discharged to CETP after confirming to the standards prescribed for inlet norms for the CETP. Treated effluent shall be disposed off into CETP, Umraya					
	only after obtaining prior permission from the GPCB. Membership to M/s	Summary of characteristics for		ated indust 23 to Sep-23:	trial e	effluent
	Enviro-Infrastructure Co. Ltd. for the disposal of treated effluent shall be	Parameters	Unit	PERMISSIB LE LIMIT	Min.	Max.
	obtained and a copy submitted to the	pН	-	5 to 9	6.36	8.52
	Ministry's Regional Office at Bhopal.	Temp ⁰ C	⁰ C	45	29	31
	Domestic sewage shall be treated in	TSS	mg/L	600	6	80
	membrane bioreactor based sewage	Oil & Grease	mg/L	20	BDL	BDL
	treatment plant (STP).	Fluorides	mg/L	2	0.2	0.79
		Sulphides	mg/L	2	0.2	1.1
		Colour	pt/Co	-	30	80
		Ammonical Nitrogen	mg/L	50	3.4	4.3
		Free Ammonia	mg/L	5	1	1
		Copper	mg/L	2	BDL	BDL
		Zinc	mg/L	5	0.08	0.54
		BOD (05-Days)	mg/L	500	54	130
		COD	mg/L	2000	198	422
		Arsenic (as As)	mg/L	0.2	BDL	BDL
		Mercury (as Hg)	mg/L	0.001	BDL	BDL
		Lead (as Pb)	mg/L	0.2	BDL	BDL
		Cadmium (as Cd)	mg/L	2	0.04	0.17
		Hexavalent Chromium	mg/L	1	BDL	BDL
		Total Chromium (as Cr)	mg/L	2	BDL	BDL
		Nickel	mg/L	5	0.11	0.33
		Cyanide as CN	mg/L	0.2	BDL	BDL
		Phenolic Compound	mg/L	5	BDL	BDL
		Company has a additional efflue Domestic sewag Sewage Treatme Details of waste herewith as AN	ent disc ge is be ent Plar water a	harge. eing treated i ht. analysis resulf	n from El	ICL for

Sr. No	Conditions	Compliance Status
x	Distillation residue and oil contaminated waste shall be incinerated. Chemical sludge from wastewater treatment/ETP, sludge from scrubber, spill control powder and waste refractory shall be disposed by land filling. The process product mix shall be reused in process. Membership for the disposal of solid/hazardous waste shall be obtained from M/s Nandesari Environment Control Ltd. and a copy submitted to the Ministry's Regional Office at Bhopal. Waste/residue containing oil, spent solvent and used oil shall be sold to the authorized recyclers only.	 Complied Used oil is sent to the registered recycler M/s Suraj Barrel which is CPCB authorised recycler. Company has taken membership of following landfill sites for disposal of landfill waste: NECL, Nandesari BEIL, Dahej SAFE, Bharuch Company has taken membership of following incineration & Co Processing site: RSPL, Panoli BEIL, Ankleshwar SEPPL, Kutch Company has also taken membership of NECL for disposal of Incineration waste.
xi	High calorific organic residues shall be sent to cement industries for burning in the kiln or disposed off to nearby TSDF site	Complied Company has taken membership of M/s. Recycling Solutions Pvt. Ltd., Panoli which disposes off waste to cement industries.
xii	The Company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans boundary Movement) Rules, 2008 as amended time to time for management of hazardous wastes and prior permission from GPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. The concerned company shall undertake measures for fire fighting facilities in case of emergency.	Complied Company has taken Authorization vide CC&A CC&A AWH-129630 valid up to 30/06/2028 for collection, storage and disposal of hazardous waste. Adequate fire fighting systems like fire buckets, fire extinguishers, etc. provided near Hazardous waste storage areas.
xiii	The project authorities shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 <i>as</i> amended in October, 1994 and January, 2000. All Transportation of Hazardous Chemicals shall be as per the MVA, 1989.	Complied Company strictly complies with all rules and guidelines under MSIHC 1989 as amended till date. Transportation of all hazardous chemicals is being carried out as per the MVA 1989 as amended till date.
xiv	Hazardous chemicals shall be stored in tanks, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be done by pumps.	Complied Necessary precautions are taken to handle hazardous chemicals and solvents in a safe manner.

Sr. No	Conditions	Compliance Status
xv	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.	Complied Transfer of material is carried out under close supervision. LI, LT, etc. provided to avoid any spillage/overflow. Storage tanks have secondary containment/dyke facilities so that there will be no chance of leakage in the surrounding area.
xvi	A written commitment regarding safe handling of Cl_2 shall be obtained, if transportation of Cl_2 from supplier to project premise is done by the supplier. Risk assessment due to handling of Cl_2 storage and usage shall be carried out and accordingly mitigation measures shall be adopted.	Complied. Supplier is responsible for safe transportation of Cl ₂ from supplier end to project premises. Risk Assessment for Cl ₂ storage & handling has been carried out as a part of Environmental Impact Assessment study and all mitigation measures have been adopted.
xvii	The company shall undertake following waste minimization measures:- a. Metering and control of quantities of active ingredients to minimize waste.	Complied Started vacuum pump seal water recirculation and increased condensate recovery in plant thereby reducing effluent generation quantity and increasing water conservation.
	b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.	Optimised filtration through filter-aid and reduced the purge off frequency of TnBal product.
	c. Use of automated filling to minimize spillage.	Company has adopted automated filling in place of manual filling to minimise spillages.
	d. Use of close feed system into batch reactors.	Close feed system is provided in batch reactors.
	e. Venting equipment through vapour recovery system.	Recovery system is provided in all venting equipment.
	f. Use of high pressure hoses for equipment cleaning to reduce waste water generation.	Company is utilising high pressure hoses for equipment cleaning as & when required.
xviii	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 OISD 117 norms.	Complied Flameproof equipment installed in all the flammable areas as per Hazardous Area Classification. LEL detectors installed at flammable chemicals handling area. Adequate fire fighting system like fire hydrant system, fire trailer pump, fire extinguishers, SCBA set, water sprinkler, etc. provided.
xix	Training shall be imparted to all employees on safety and health aspects of chemical handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular	Complied Regular training is provided to all employees on safety & health aspects.

Sr. No	Conditions	Compliance Status
	basis. Training to all employees on handling of chemicals shall be imparted. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Pre-employment & periodic medical examinations for all employees are undertaken on a regular basis and records are maintained. Occupational health check up of all workers is carried out on a regular basis.
xx	Green belt shall be developed in 33 % of the plant area. Selection of plant species shall be as per the CPCB guidelines.	Complied Green belt is developed as per CPCB guidelines.
xxi	The company shall comply with the recommendations made in the EIA/EMP/Risk assessment report. Risk assessment shall be included in the safety Manual.	Complied Company has taken all measures to comply with the recommendations made in the EIA/EMP/Risk Assessment report.
xxii	Provision shall be made for the housing for the construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	Contract persons were from nearby villages; so arrangement of housing facilities for them was not required at our site.
xxiii	All the commitments made to the public during the Public Hearing / Public Consultation meeting held on 26 th May, 2009 shall be satisfactorily implemented.	Complied

Sr.No	Conditions	Compliance Statu	15			
B .	GENERAL CONDITIONS:					
i	The project authorities shall strictly adhere to the stipulations made by the Gujarat Pollution Control Board.	Complied Company follows a Pollution Control B		itions ma	de by G	ujarat
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	Pollution Control Board.Noted & CompliedTotal approved quantity for expansion in EC was37887 MTPA out of which Gulbrandsen has alreadyreceived CTE and CC&A for 20236 MTPA vide CTEorder No. 43965 dtd 03.11.2011 and CC&A order No.AWH 46164 dt 27.03.2012.Gulbrandsen is yet to receive CTE for the remaining17651 MTPA. Company has submitted CTEapplication for 5568 MTPA production out ofremaining 17651 MTPA vide application No. 108775dated 31.05.2016 but as framework of Padra policy isunder preparation, GPCB has not yet approved ourCTE application.				
iii	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 station is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Complied Company has installed four Ambient Air Quality monitoring stations in downwind and upwind directions. Summary of AAQM data for Apr-23 to Sep-23:				
		PARAMETER	Unit	Norms	Min.	Max.
		Particulate Matter (PM10)	µg/m3	100	44	87
		Particulate Matter (PM2.5)	µg/m3	60	18	34
		Oxides of Sulphur as SO2	µg/m3	80	10.8	17.5
		Oxides of Nitrogen as NO2	µg/m3	80	13.6	24.7
		Hydrogen Chloride (HCl)	µg/m3	200	BDL	BDL
		Chlorine (Cl2)	µg/m3	100	BDL	BDL
		Ozone	µg/m3	100	BDL	BDL
		Lead	µg/m3	1	BDL	BDL
		СО	µg/m3	2	0.11	0.27
		Ammonia	µg/m3	400	BDL	BDL
		Benzene	$\mu g/m3$	5	BDL	BDL
		Benzo(a)Pyrene	ng/m3	1	BDL	BDL
		Arsenic	ng/m3	6	BDL	BDL
		Nickel	ng/m3	20	BDL	BDL
		Monthly AAQ Mo NABL certificate				

Sr.No	Conditions	Compliance Status					
		Ambient Air Quality monitoring station are enclosed herewith as ANNEXURE : 5.					
iv	The overall noise level 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	Noise level is monitored regularly in and around the plant area. Summary of ambient noise level for Apr-23 to Sep-23:					
		Duration Unit Norms Min. Max.					1
		Day Time	dB(A)	75.0	59	74	
		Night Time	dB(A)	70.0	53	67	
	dBA (day time) and 70 dBA (night time).	Overall noise level in and around the plant area is					
		within the limit. Noise level results are enclosed as ANNEXURE : 8.					as
V	The Company shall harvest rainwater from the roof tops of the buildings and	Complied Company has constructed a tank to collect rainwater and utilises the same in cooling towers.					
	storm water drains to recharge the ground water and use the same water						iter
	for the process activities of the project to						
	conserve fresh water.	Company has also constructed a check dam in Mujpur village for collection & storage of rainwater.					
vi	Usage of Personnel Protection	Complied					
	Equipment (PPEs) by all employees/ workers shall be ensured.	Use of PPE is mandatory in the plant premises. No person is allowed inside the plant area without					
		necessary PPE. Company has implemented Life Saving Rules.					
vii	Occupational health surveillance of the workers shall be done on a regular basis	Complied.					
	and records maintained as per the Factories Act.						
viii	The company shall also comply with all	Complied.					
	the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the	Company has taken necessary action for compliance of recommendations proposed in EIA/EMP.					
	EIA/EMP in respect of environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.						
ix	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administration.	Complied. Company under development activ • Supporting • Running he • Skill develo • Women em • Environme	g Govern ealth cen opment p opowerm	ment heal ter in Muj project ent progra	nding vi th cente pur villa am	er	nic
		Details of CSR acti	ivities are	e given in	ANNEX	KURE : '	7.

Sr.No	Conditions	Compliance Status		
x	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	The company takes necessary measures for overall		
xi	A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	Complied. A separate Environment, Health & Safety Management Cell has already been set up. A full fledged in-house laboratory facility is available for environmental management & monitoring functions.		
xii	The company shall earmark adequate funds to implement the conditions stipulated by the Ministry of Environment and Forests 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.	Complied Every year Adequate funds are allocated toward capital cost and recurring cost for environmental pollution control measures. The fund allocated for Environment management is not diverted to any other purpose.		
xiii	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 who suggestions/ representations, if any, were received while processing the proposal.	Complied Environment Clearance letters have been sent to all stakeholders.		
xiv	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, the respective Zonal Office of CPCB and the Gujarat Pollution Control Board. A copy of Environmental Clearance and six monthly compliance status reports shall be posted on the website of the company.	Complied The company submits six monthly compliance reports of Environmental Clearance including results of monitoring data to all the concerned regulatory authorities on a regular basis.		
xv	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	Complied. The environmental statement for financial year 2022-2023 has been submitted to the state pollution control board vide letter No. GPL/EHS/GPCB ID 21999/ES-2022-23 dated 26.06.2023 and also uploaded on the company website. Environment Statement for 2022-2023 is enclosed as ANNEXURE : 10 .		

Sr.No	Conditions	Compliance Status	
	conditions and shall also be sent to the respective Regional Offices of MoEF by e-mail.		
xvi	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 <u>http://envfor.nic.in</u> . 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.	Advertisement of Environmental Clearance was published in English newspaper "THE TIMES OF INDIA" VADODARA edition dated 01.12.2010 & Gujarati newspaper "GUJARAT SAMACHAR" edition dated 30.11.2010. THE TIMES OF INDIA, AMMEDABAD DECEMBER 1, 2010 (112.2010) Gulbrandsen Chemicals Pvt. Ltd. On Coatal Highway Vilage Mogur. Tat. Padra Dist. Vadodra: Gujarat Dist. Dist.	
		જલ્લી : વહોદરા, ગુજરાત પ્રચાવરણ સ્વીકૃતિ આ સાથે લાગવા વળગવા તમામને માણ કરવામાં આવે છે કે ગુલબ્રાન્કસન કેમીકલ્સ પ્રાઇવેટ ઉમોરિક ને MOEF Dehir મારે ઓર્ગેનોમેટાલીક અને સિન્થેટીક ઓર્ગેનીકસનો વિસ્તરાય અને નવા ઉત્પાદન માટે પત્રકમાંક જે ૧૧૦૧૧ / ૧૫૯ ૧૦૦૮-IA-II(I), વારીબ ૨૩ નવેસ્બર ૨૦૧૦ માટા પર્ચાવરણ સ્વિકૃતિ આપવામાં આવેલ છે. પર્ચાવરણ સ્વિકૃતિ નલલ ગુજરાવ પ્રદુષણ નિચંત્રણ નિગમની વડોટરા વધા ઓદીનગરની કચેરી વધા MOEF ની વેલસાઇટ http://www.envformic.in પર ઉપલબ્ધ છે.	
xvii	The project authorities 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 the date of start of the project.	The company had informed the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work.	
8.0	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted	

Sr.No	Conditions	Compliance Status
9.0	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Noted
10.0	Any appeal against this environment clearance shall lie with the National Environment Appellate Authority, if preferred within a period of 30 days as prescribed under Section 11 of the National Environment Appellate Authority Act, 1997.	Noted
11.0	The above conditions will enforce, inter alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981 the Environment (Protection) Act, 1986, Hazardous Wastes (Management and Handling) Rules, 1989/2003/2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Complied Company fulfils all the applicable statutory requirements. Company has taken Authorization vide CC&A AWH-129630 valid up to 30/06/2028 for collection, storage and disposal of hazardous waste. Company has—taken PLI policy vide policy no L0222433 valid up to 31/12/2023 as per the Public Liability (Insurance) Act, 1991. The same is enclosed herewith as ANNEXURE : 11 .