

ENVIRONMENTAL CLEARANCE COMPLIANCE REPORT

For

APRIL 2023 TO SEPTEMBER 2023

By:

GULBRANDSEN SPECIALITY CHEMICALS LLP Plot No.D-3/5, + D/3/6/1, G.I.D.C Industrial Estate, Dahej-III, Dahej-Amod Road , Taluka : Vagra, District : Bharuch: 392130

HALF YEARLY ENVIRONMENT CLEARANCE COMPLIANCE REPORT

EC NO. SEIAA/GUJ/EC/5(f)/528/2023 dt 06.05.2023 (AMENDMENT TO EC NO. SEIAA/GUJ/EC/5(f)/845/2021 dt 10.06.2021)

FOR PERIOD FROM APRIL 2023 TO SEPTEMBER 2023

Sr.	Conditions	Compliance Status
No.	SPECIFIC CONDITIONS	
1	Project proponent (PP) shall obtain clarification from MoEF & CC for claiming that Aluminium Chloride (AlCl ₃) solution to be considered as a product and not hazardous waste before commencement of production activity at proposed site as per assurance submitted by PP.	Permission letter obtained from MoEFCC vide letter dated 05.08.2021 regarding AlCl3 solution as a product as per HOWM Rules 2016.
2	PP shall provide secure and flame proof area for storage, manufacturing and handling of Triethylaluminum (TEAI), looking to property of Highly flammable liquid and catches fire spontaneously if exposed to air and shall keep minimum inventory of TEAI and other metal alkyls at site as per assurance submitted by PP.	Secure and flame proof area for storage, manufacturing and handling of Triethylaluminum (TEAI) has been provided. We shall keep minimum inventory of TEAI and other metal alkyls at site.
3	line with the EIA Notification vide S.O. 1223 (E) dated 27/03/2020 and the pollution load shall remain the same as committed. (b) Project proponent shall not take continuous/commercial production of the R & D materials. Necessary approvals shall be obtained from the concern authorities prior to commercial production of R & D materials. (c) Unit shall submit relevant details of R & D products like raw materials, its safety measures to the regulatory authority well before R & D activity.	(a)&(b) We have not manufactured R&D products till date. (c) We shall submit relevant details of R&D products like raw materials, its safety measures to the regulatory authority well before R&D activity. (d) We shall submit relevant details of R&D products like different wastes generated (Quantity & Quality) and its management to the regulatory authority within a month of R&D activity.
4	Unit shall install CEMS in line to CPCB directions to all SPCB vide letter no. B-29016/04/06PCl-1/5401 dated 05.02.2014 for effluent discharge and air emission as per pollutants discharge/emission from respective project and an arrangement shall also be done for reflecting the online monitoring results on the company's server, which can be assessable by the GPCB/CPCB on real time basis. [Whichever (Air emission & Effluent discharge) is applicable as per the prevailing guidelines of GPCB/CPCB].	Not applicable. Because CEMS is not applicable to Chemical Industries as per CPCB directions and as per letter no. B-29016/04/06PCl-1/5401 dated 05.02.2014.
5	The PP shall develop green belt [45384 m2 (33 %) inside plant premises] as per the undertaking submitted before SEAC. Green belt shall be developed	Green Belt development will be implemented within 3 years of operation

Sr. No.	Conditions	Compliance Status			
	with native plant species that are significant and used for the pollution abatement as per the CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.	phase in consultation with GPCB. Till date we have planted ~1300 trees.			
6	Close loop solvent recovery system with an adequate condenser system shall be provided to recover solvent vapours in such a manner that recovery shall be maximum and recovered solvent shall be reused in the process within premises.	Close loop solvent recovery system with an adequate condenser system has been provided and recovered solvent is reused in the process within premises once solvent is used.			
7	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR Logbooks shall be maintained.	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines.			
8	All measures shall be taken to prevent soil and groundwater contamination.	All measures are taken to prevent soil and groundwater contamination during the construction phase. Dykes are provided for all storage tanks, concrete floor is provided in process areas and storage areas. Spill control procedure in place.			
9	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.	Ambient Air Quality Monitoring is carried out at site through a third party NABL accredited laboratory and all the results are within permissible limit. Summary of AAQM data for Apr-23 to Sep-23:			
		Parameter Unit Norms Result Result (Min.) (Max.)			
		Particulate Matter (PM10) μg/m3 100 49 83			
		Particulate			
		Oxides of Sulphur as μg/m3 80 SO2 10.4 17.4 Oxides of			
		Nitrogen as μg/m3 80 NO2 13.7 23.9			
		HCl μg/m3 200 BDL BDL			
		Cl2 μg/m3 100 BDL BDL			
		VOC μg/m3 - BDL BDL			
10	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G. S. R. 608 (E) dated 21/07/2010 and amended from time	National Emission Standards for Organic Chemicals Manufacturing Industry shall be followed.			
	to time shall be followed.				

Sr.	Conditions	Compliance Status
No.	pollutants, and shall carry out the project development in accordance & consistence with the same.	
12	The project proponent must strictly adhere to the stipulations made by the Gujarat Pollution Control Board, State Government and/or any other statutory authority.	Noted and complied with.
13	The PP shall develop green belt [1650 Sq. m (33%) of total plot area] within premises as committed before SEAC. Green belt shall be developed with native plant species that are significant and used for the pollution abatement as per the CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.	Green Belt development will be implemented within 3 years of operation phase in consultation with GPCB and as per CPCB guideline.
14	Safety & Health:	
	(a) PP shall obtain PESO permission for the storage and handling of hazardous chemicals.	(a) PESO Permission obtained.
	(b) PP shall provide Occupational Health Center (OHC) as per the provisions under the Gujarat Factories Rule 68-U.	(b) Full fledged OHC is operational.
	(c) PP shall obtain fire safety certificate / Fire No-Objection certificate (NOC) from the concerned authority as per the prevailing Rules / Gujarat Fire Prevention and Life Safety Measures Act, 2016.	(c) Fire NOC is not applicable.
	(d) Unit shall adopt a functional operations/process automation system including emergency response to eliminate risk associated with the hazardous processes.	(d) Process automation system is in place. Trained emergency response team is available.
	(e) PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident.	(e) Mock drill conducted as per plan on a regular basis. Evacuation plan is defined on plant layout and it is displayed at strategic location.
	(f) PP shall install an adequate fire hydrant system with foam trolley attachment within premises and separate storage of water for the same shall be ensured by PP.	(f) Fire hydrant system with separate storage tanks in place.
	(g) PP shall take all the necessary steps for control of storage hazards within premises ensuring incompatibility of storage raw material and ensure the storage keeping safe distance as per the prevailing guidelines of the concerned authority.	(g) Storage done based on compatibility of the chemicals and with safe distance.
	(h) PP shall take all the necessary steps for human safety within premises to ensure that no any harm is caused to any worker/employee or labor within premises.	(h) Necessary steps for human safety is in place.
	(i) Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.	(i) Flame proof electrical fittings provided, wherever applicable.
	(j) PP shall provide double earthling to solvent storage tanks.(k) Unit shall never store drum/barrels/carboys of	(j) Double earthing provided to the solvent storage tanks.(k) Incompatible materials will not be
	incompatible material/chemical together.	stored together.

Sr. No.	Conditions	Compliance Status
1,00	(l) Unit shall provide effective Isolation for the Process area and storage of hazardous chemicals.	(l) Effective Isolation ensured for the Process area and storage of hazardous chemicals.
	Hydrogenation vessel.	(m)Safety valve & rupture disc provided in autoclave.
	(n) PP shall provide all pyrophoric chemicals, storage tanks with high & low level alarms systems and level shall be measured through radar based technology and all storage tanks shall be provided with a dyke and dyke wall be connected to the burning pit for safe burning away from the process area.	(n) All pyrophoric chemicals, storage tanks provided with high & low level alarms systems with radar based technology and all storage tanks provided with a dyke and dyke wall be connected to the burning pit for safe burning away from the process area.
	(o) Unit shall provide safety valve and rupture disc, as well as auto dump or auto quenches/ suppresses system for alkylation vessel safety.	(o) Safety valve and rupture disc, as well as auto dump or auto quenching system provided for alkylation vessel safety.
	(p) Unit shall provide a spare tank with emergency transfer system and bund/ dyke wall to Ethylene oxide storage tank.	(p) Not applicable as we are not storing Ethylene oxide.
	(q) Unit shall strictly follow up Hydrogen gas storage and its handling standard operating Procedure (SOP) as submitted by PP.	(q) Compliance with Hydrogen gas storage and its handling standard operating Procedure (SOP) ensured.
	` '	(r) Effective fire hydrants, water monitors
	monitors & foam application system at solvent	& foam application system are
	storage tank farm area and unit shall provide	provided at solvent storage tank farm
	adequate safety system such as water sprinklers, water curtains, foam pouring system etc. to	area with required safety system to restrict cascade fire emergencies in
	restrict cascade fire emergencies in solvent tank	solvent tank and pyrophoric
	and pyrophoric chemicals storage tank farm area.	chemicals storage tank farm area.
A.2	WATER	
15	Total water requirement for the project shall not exceed 1132.96 KLD. Unit shall reuse 642.09 KLD of treated industrial effluent within premises. Hence, fresh water requirement shall not exceed 490.87 KLD and it shall	We shall meet fresh water requirements through GIDC as per phase wise implementation of the project. Prior permission from GIDC has been
	be met through GIDC water supply only. Prior permission from concerned authority shall be obtained for withdrawal of water.	obtained for fresh water.
16	The industrial effluent generation from the project shall not exceed 604.90 KLD.	It will be ensured that effluent generation will be within the permissible quantity.
17	Industrial effluent shall be segregated into two streams (1) high COD and TDS effluent (2) Low COD and TDS effluent and it shall be managed as below	Average 9.6 KLD industrial effluent generated during Apr-23 to Sep-23 which is treated in ETP.
	 High COD and TDS effluent (270 KLD): 270 KLD, High COD and TDS effluent from process shall be treated in MEE. 262 KLD, MEE condensate shall be reused within premises. Low COD and TDS effluent (335.50 KLD): 183.01 KLD, Low COD effluent from process, washing, utilities and scrubber shall be treated in 	High TDS stream generated from the process is treated in in-house MEE with MVR and MEE condensate is reused within the premises.
	ETP consists of primary treatment units and sent to CETP-Dahej for further treatment & disposal.	

Sr.	Conditions	Compliance	Status		
No.	➤ 151.89 KLD, industrial effluent from process shall be recovered and reused back in process.				
18	Treated wastewater shall be sent to CETP-Dahej only after complying with the inlet norms of common facilities prescribed by GPCB to ensure no adverse impact on Human Health and Environment.	It is ensured that effluent meets the inlet quality standards of CETP Dahej. Summary of major effluent parameters analyzed before sending treated effluent to CETP:			
		Parameter	UoM	Result (Min.)	Result (Max.)
		рН	-	7.1	8.4
		TDS	mg/l	880	2284
		TSS	mg/l	6	6
		COD	mg/l	12	661
		BOD	mg/l	3	205
19	Unit shall feed wastewater to in-house MEE only after ensuring content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no adverse impacts on Environment and Human Health.	Noted and s	shall be c	omplied w	rith.
20	Domestic wastewater generation shall not exceed 43.50 KL/day for proposed project and it shall be treated in STP. It shall not be disposed off through soak pit/septic tank. Treated sewage shall be utilized for gardening and plantation purpose within premises after achieving on-land discharge norms prescribed by the GPCB.	Average generation treated in S purposes we ensuring dis	TP and urithin the	KL/day tilized for e plant pr	gardening emises by
21	During monsoon season when treated sewage may not be required for the plantation / Gardening / Green belt purpose, it shall be stored within premises. There shall be no discharge of wastewater outside the premises in any case.	During mosewage is somestic equivalent	tored ar effluent	nd it is en is not o	sured that
22	Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water during rainy days.	Buffer water capacity is treated wast	provid	led for s	storage of
23	The unit shall provide metering facility at the inlet and outlet of ETP & MEE and maintain records for the same.	Flow meters of ETP & M are maintain	s are pro IEE and	vided at Iı	nlet-Outlet
24	Proper logbooks of ETP & MEE; recycle/ reuse of treated/ untreated effluent; chemical consumption in effluent treatment; quantity & quality of treated effluent; power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time.	Noted and s		omplied w	rith.
A.3 25	AIR Unit shall not exceed fuel consumption for boilers,	Unit has no	t exceed	ed fuel co	nsumption
	TFH, tin melter and D G Sets as mentioned below:	for TFH and			

Sr. No.	Cor	nditio	ns						Compliance Status
	Sr. No.	Source o with cap	f emission acity	Height (meter)	Type of Fuel	Quantity of Fuel MT/Day	Type of Emission	Air pollution control equipment	
	1		H - 3 Nos.) on stack)	40	Natural Gas or LDO*	25525 scm/Day 21 MT/Day	PM SO2 NOx	Adequate stack Height	
	2			30	Natural Gas or LDO*	3.84 MT/ Day 4.2 MT/Day	PM SO2 NOx	Adequate stack Height	
	3	Heater (3 & 4 (Capac 8 lac K each)	rity –	30	Natural Gas or LDO*	3.84 MT/ Day 4.2 MT/Day	PM SO2 NOx	Adequate stack Height	
	4	Tin me (Capac 5 MT/	rity -	11	Natural Gas	0.015 MT/Day	PM SO2 NOx	Adequate stack Height	
	5	DG Set (750 K ¹ No. 1		11	HDS	3.07 MT/Day	PM SO2 NOx	Adequate stack Height	
	6	DG Set (750 K No.2	t VA)	11	HDS	3.07 MT/Day	PM SO2 NOx	Adequate stack Height	
	7	DG Set (750 K' No.3		11	HDS	3.07 MT/Day	PM SO2 NOx	Adequate stack Height	
	8	DG Set (750 K' No. 4		11	HDS	3.07 MT/Day	PM SO2 NOx	Adequate stack Height	
	9	DG Set (750 K' No. 5		11	HDS	3.07 MT/Day	PM SO2 NOx	Adequate stack Height	
26	TT.	. 1	11 .	1	1 ,	A DCM	• 11 (1	A L A ADCM C CL
26					dequate nentioned	APCM v d above:	vith f	iue gas	Adequate APCM for flue gas generation sources has been provided as applicable.
27	Uni	t sha	ll provid	le ade		PCM wit	h pro	cess gas	Adequate APCM as per EC conditions are provided as applicable.
		ocess /ent	Stack attach	ned to	Stack/ Vent Height (meter)	APCM	1	Pollutants	
		ocess ent-1	TBTH scrub TOT, P-1062 UV-1164, TE MBTC & DI derivatives scrubber, Pi plant-1	2, BT, BTC	21.0	HCl scrubber HCl generate P-1062 proces water Caustic scrub packed for Ho scrubber outle other plant vo	d in s in ber with Cl et and	HCl	

Sr. No.	Conditions						Compliance Status			
						Scrubbe respecti Pilot Pla	ive gases fro	om		
	1 1	Vent-3 derivatives, TMAL, MA MMAO, Di DEZ, DEAI			21.0	Caustic scrub H	scrubber to		HCl	
	1 1			3 , 3		s, AO, bibal-H, LOX	21.0	21.0 Water scrubbers followed by caustic scrubber columns to scrub acidic vapors from vents		
	Process Vent-4		Activated bed	carbon	21.0	plants of Hydroc adsorbe	om different containing carbon is ed in ed carbon b		НС	
		Process Vent-5 PU Additi & SND) pi scrubber		ves (SO ant	21.0	Vent from PU additives (SO & plant scrubber containing HCI be scrubbed the water scrubber		11	HCl	
28			l provided belov		quate AF	CM w	vith flar	e sta	acks as	Air assisted flare is installed for complete combustion of gas.
	Flare stack no.	Pla	nt	Flare st	ack attached to	o	Height (meter)		r pollution trol System	
	Flare :1	& CC (Procedure)	Bal, TiBAl, HAl, DAI, DC, SC, AC, BAC, SC, AL, AL, AL, ALO, ALOX, Z, SALH, tallocene)	burning Ethane, Butane, normal operation abnorm situation	cturing activi of vent g Ethylene, Hy Butene etc	as like drogen, during tinuous during ergency om R &	30 meter	flare air supp com	assisted e, Excess is plied for plete bustion as	
	Flare :2	TEA ThE EAI ,DE C,IH MA MM	duct:	treatme scrubbe scrubbe scrubbe flare continu as du	Process vent from HCl treatment sent to Water scrubber, followed by caustic scrubber. Final Vent of scrubber vent connected to flare for normal and continuous operation as well as during abnormal and emergency situations.					
	Flare :3	& C (Pro Wax Alco Etho	wax Plant Other oduct: PE x, PE ohol, PE oxylate, T,TBTCL)	manufa burning Ethylen during continu as du	ylene wax octuring activi of vent g e, Ethane, Bur normal ous operation ring abnormancy situations.	ties for as like tane etc and as well al and	30 meter			

Sr.	Conditions	Compliance Status				
No.		-				
30	followed to reduce the fugitive emission: Internal roads shall be either concreted or asphalted	We have installed HC sensors and monitor fugitive emissions if any through the sensors. Internal roads are concreted properly to reduce the fugitive emission during vehicular movement. Air borne dust is not generated as the internal roads are concreted. A green belt is being developed all around the plant boundary and also along the roads to mitigate fugitive & transport dust emission. Regular monitoring of Volatile Organic Compounds (VOCs) is carried out in				
	ambient air.	Ambient Air and work zone area.				
31	Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, HCI, HC and VOCs shall be carried out in the impact zone and its records shall be maintained. Ambient air quality levels shall not exceed the standards stipulated by the GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be taken	Ambient Air Quality Monitoring carried out at site through a third party NABL accredited laboratory and all the results are within permissible limit. Summary of AAQM data for Apr-23 to Sep-23:				
	immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the	Parameter Unit Norms Result Result (Min.) (Max.)				
	GPCB.	Particulate Matter μg/m3 100 (PM10) 49 83				
		Particulate				
		Oxides of Sulphur as μg/m3 80 SO2 10.4 17.4				
		Oxides of Nitrogen as NO2 μg/m3 80 13.7 23.9				
		HCl μg/m3 200 BDL BDL				
		Cl2 µg/m3 100 BDL BDL				
		VOC μg/m3 - BDL BDL				
A.4	SOLID/HAZARDOUS WASTE					
32	All the hazardous/ solid waste management shall be taken care as mentioned below:	Hazardous/solid waste management is being taken care of as per EC condition.				
	Sr. No. Type/Name of Hazardous waste Specific Source of generation (Name of the Activity, Product etc.) Specific Source of generation (Name of the Activity, Product etc.) Schedul (MT/ e as per Annu HW m) Rules					

Sr. No.	Cor	nditions			Compliance Status		
	2	Chemical sludge from wastewater treatment (ETP Sludge) MEE Sludge (Chemical Sludge)	ETP Plant MEE Plant	35.3 Schedule -1 37.1 Schedule -1	2893.5	Collection, storage, transportation and disposal at TSDF &/or disposal at Preprocessing facilities approved by SPCB or disposal to SPCB approved	
	3	Spent Solvent	TMAL, DEZ, Magnesium Ethoxide, Polyethylene wax & derivatives, UHMWPAO, DRA, Triazine derivatives, Metallocene, Activated carbon	20.2 Schedule -I	1954	Collection, storage, transportation and sell it to authorized recycler & re user &/or collection, storage, transportation and sell it to authorized recycler with the storage and send it to	
	4	Distillation Residue	MonobutyltinTrich loride (MBTC) / Dibutyltin Dichloride (DBTC) / Mixed Butyl Tin Chloride (5% to 95%, TOT, MBTC derivatives, Polyethylene wax & derivatives, UHMWPAO, R&D	20.3 Schedule -I	431.4	and send it to authorized solvent distillation facility for reuse after Distillation &/or disposal to SPCB approved Coprocessing unit &/or disposal by incineration at SPCB approved CHWI site.	
	5	Spent carbon	Stannous Octoate & Activated carbon bed scrubbers	36.2 Schedule -I	108	Collection, storage, transportation and disposal at Preprocessing facilities approved by SPCB &/or SPCB approved Coprocessing unit &/or disposal by incineration at SPCB approved CHWIsite.	
	6	Discarded containers/barrels/liners used for hazardous waste/chemicals	All plant discarded container & bags	33.1 Schedule -I	1)Jum bo bags: 10,790 nos, 32.37 MTPA 2)Barr els :22310 nos, 334 MTPA 3) Liners / bags: 1,29,5 60 nos, 12.95 MTPA	Collection, storage, Transportation , and Disposal by selling to SPCB authorized recycler having Rule-9 permission for decontaminati on at their site.	

Sr. No.	Con	ditions			Compliance Status		
	7	Contaminat ed cotton rags or other cleaning material (Spill Control Powder)	TBT plant filter aid & Other plant spill contaminated Powder	33.2 Schedule -I	83.0	Collection, storage, transportation and disposal at Preprocessing facilities approved by SPCB &/or SPCB approved Coprocessing unit &/or disposal by incineration at SPCB approved CHWI site.	
	8	Used/Spent Oil	Alkyl, Alkyl derivatives, TMAL, MAO, MMAO, DEALOX, DEZ, DiBAL-H, TBT	5.1 Schedule -I	2688.5	Collection, storage, Transportation n, Disposal by selling to registered re-recyclers under Rule-9.	
	9	Waste / Residue containing oil	Alkyl, Alkyl derivatives, TMAL, MAO, MMAO, DEALOX, DiBAL-H, MTX, DBM, Polyethylene Wax & derivatives, R&D	5.2 Schedule -I	5175	Collection, storage, transportation and disposal at Preprocessing facilities approved by SPCB &/or disposal by incineration at SPCB approved CHWI site.	
	10	Inorganic acids (Spent HCl 10 to 30 %)	Scrubber (TBTCl & Triazine derivatives)	B15 Schedule -II	958 KL/A nnum	Collection, storage and reuse within premises.	
	11	Other solid waste, ceramic wool having hazardous constituents	All plants	36.1 Schedule -I	20.0	Collection, storage, transportation and disposal at TSDF &/or disposal at Preprocessing facilities approved by SPCB	
	12	Anhydrous Magnesium Chloride / Magnesium Chloride Solution (10% to 50%)	Process (5 % to 50 % di butyl magnesium (DBM) in hexane/ heptane /iso-pentane /pentene/ toluene)	36.1 Schedule -I	100.0	Collection, storage, transportation and sell to actual user having Rule-9 permission	
	13	Aluminum Sulphate	Residue Treatment of Alkyl & Alkyl Derivatives	36.1 Schedule -I	620.4		
	14	Sodium Aluminate	Residue Treatment of Alkyl & Alkyl Derivatives	36.1 Schedule -I	620.4		
	15	Diborane in Tetrahydorf uran	Process (Tetra Butyl Tin Hydride (TBTH))	36.1 Schedule -I	5.2		

Sr. No.	Conditions	Compliance Status
	16 Sodium Scrubber 36.1 13144 Collection, Storage and Send to ETP for further treatment	
33	Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.	
34	Unit shall explore the possibilities for environment friendly methods like co-processing of hazardous waste for disposal of Incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.	3
35	The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.	with provisional membership certificates have been submitted to GPCB.
A. 5	OTHER	
36	The project proponent shall carry out the entire activities of Rs 6.238 Crores [Environmental SustainabilityProjects; Medical Health care facility, Skill development program; Women empowerment program and Promoting education in nearby villages & other activities] proposed under CER shall be part of the Environment Management Plan (EMP) as per the MoEF&CC's OM no. F.No.22-65/2017-IA.III dated 30.09.2020. This shall be monitored and the monitoring report shall be submitted to the regional office of MoEF&CC as a part of half-yearly compliance report and to the District Collector. The monitoring report shall be posted on the website of the project proponent.	committed before SEAC. The entire activities proposed under CER is a part of the Environment Management Plan (EMP) as per the MoEF&CC's OM no. F. No. 22-65/2017-IA.III dated 30.09.2020. This will be monitored and the monitoring report will be submitted to the regional office of MoEF&CC and to the District Collector. The monitoring report will be posted on the company website.
37	All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared by M/s Aqua Air Environmental Engineers Pvt. Ltd and submitted by project proponent and commitments made during presentation before SEAC and proposed in the EIA report shall be strictly adhered to in letter and spirit.	5 7 1 8 1

Sr. No	Conditions	Compliance Status
В	GENERAL CONDITIONS	
B.1	CONSTRUCTION PHASE	
38	Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.	Curing agents and super plasticizers are being used to reduce water demand during the construction phase.
39	Project proponent shall ensure that the surrounding environment shall not be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for controlling fugitive emission.	Constructed pucca roads to avoid dusting. Trucks supplying Grit, Rubble, sand, etc. are always covered.
40	All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the construction phase.	Sewage Treatment Plant of 10 KLD capacity is installed at the site.
41	First Aid Box shall be made readily available in adequate quantity at all the times.	First Aid Box is made readily available in adequate quantities at all times.
42	The project proponent shall strictly comply with the Building and other Construction Workers' (Regulation of Employment & Conditions of Service) Act 1996 and Gujarat rules made there under and their subsequent amendments. Local bye-laws of concern authority shall be complied in letter and spirit.	We have taken BOCW license/registration.
43	Ambient noise levels shall conform to residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during the construction phase.	Ambient air and noise quality monitoring is carried out on a monthly basis from NABL accredited laboratory. All the results are within the permissible limits.
44	Use of Diesel Generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the EPA Rules for air and noise emission standards.	DG set is equipped with acoustic enclosures and according to EPA regulations.
45	Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.	Domestic wastewater is treated in STP.
46	All topsoil excavated during construction activity shall be used in horticultural / landscape development within the project site.	Excavated soil will be reused for green belt/ landscape development.
47	Excavated earth to be generated during the construction phase shall be utilized within the premises to the maximum extent possible and balance quantity of excavated earth shall be disposed off with the approval of the competent authority after taking the necessary precautions for general safety and health aspects. Disposal of the excavated earth during construction phase shall not create adverse effect on neighbouring communities.	Excavated soil will be reused for green belt/ landscape development.
48	Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, Ready Mix Concrete [RMC) and lead free paints in the project.	We are using Fly Ash bricks and using RMC which contains Fly Ash.
49	Fly ash shall be used in construction wherever applicable as per provisions of Fly Ash Notification	We are using Fly Ash bricks and using RMC which contains Fly Ash.

Sr.	Conditions	Compliance Status
No	under the E.P. Act, 1986 and its subsequent amendments from time to time.	
50	Wind — breaker of appropriate height i.e. 1/3rd of the building height and maximum up to 10 meters shall be provided. Individual building within the project site shall also be provided with barricades.	Appropriate protection from the wind will be taken care of in all buildings.
51	"No uncovered vehicles carrying construction material and waste shall be permitted."	No uncovered vehicles carrying construction material and waste are permitted.
52	"No loose soil or sand or construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emissions shall be ensured."	No loose soil or sand or waste or any other construction material that causes dust is left uncovered. Uniform piling and proper storage of sand is ensured to avoid fugitive emissions.
53	Roads leading to or at construction site must be paved and blacktopped (i e. — metallic roads).	Roads leading to the construction site are paved and blacktopped.
54	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	No excavation of soil is carried out without adequate dust mitigation measures.
55	Dust mitigation measures shall be displayed prominently at the construction site for easy public viewing.	Regular Water Sprinkling is done at site to control dust and every vehicular transportation with construction material is ensured covered.
56	Grinding and cutting of building materials in open area shall be prohibited.	Grinding and cutting of building materials is prohibited in open area.
57	Construction material and waste should be stored only within earmarked area and road side storage of construction material and waste shall be prohibited.	Road side storage of construction material is prohibited. There is no waste generation.
58	Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures notified at the site. (If applicable).	Noted and shall be complied with.
B.2	OPERATION PHASE	
B.2.1	WATER	
59	The water meter shall be installed and records of daily and monthly water consumption shall be maintained.	Water meter is installed in the GIDC water supply line and record is maintained. Average water consumption from Apr-23 to Sep-23 was 47.7 KLD. Water consumption report is being submitted to GIDC on a monthly basis.
60	All efforts shall be made to optimize water consumption by exploring Best Available Technology (BAT). The unit shall continuously strive to reduce, recycle and reuse the treated effluent.	The unit continuously strives to reduce, recycle and reuse the treated effluent. Treated domestic wastewater is reused for gardening purposes.
B.2.2	AIR	
61	In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that there should not be any adverse impact on human health & environment. Unit shall carry out third party	Spray dryer is not available at site.

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	monitoring of the proposed Spray dryer & it's APCM through the credible institutes and study report for impacts on Environment and human Health shall be submitted to GPCB every year along with half yearly compliance report.	
62	Acoustic enclosure shall be provided to the DG sets (If applicable) to mitigate the noise pollution and shall conform to the EPA Rules for air and noise emission standards.	Acoustic enclosure is provided to the DG set.
63	Stack/Vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/Process gas emission.	Stack/Vents (Whichever is applicable) of adequate height are provided for flue gas, flare & process gas emission.
64	Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/MoEF&CC. At no time, emission level should go beyond the stipulated standards.	Noted and complied.
65	All the reactors / vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	All reactors/ vessels are closed.
B.2.3	HAZARDOUS/ SOLID WASTE	
66	The company shall strictly comply with the rules and regulations with regards to handling and disposal of Hazardous waste in accordance with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016, as may be amended from time to time. Authorization of the GPCB shall be obtained for collection / treatment / storage / disposal of hazardous wastes.	Noted and shall be complied with.
67	Hazardous wastes shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.	Noted and shall be complied with.
68	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable).	We have obtained necessary permission from TSDF and CHWIF and submitted their details to GPCB.
69	Trucks/Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.	Noted and shall be complied with.
70	The design of the Trucks/tankers shall be such that there is no spillage during transportation.	Noted and shall be complied with.
71	All possible efforts shall be made for Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF.	Noted and shall be complied with.
72	Management of fly ash (If any) shall be as per the Fly ash Notification 2009 & its amendment from time to	Not applicable as fly ash is not generated.

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	time and it shall be ensured that there is 100% utilization of fly ash to be generated from the unit.		
B.2.4	SAFETY		
73	The occupier/manager shall strictly comply with the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963.	Noted and complied with.	
74	The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules (MSIHC) 1989, as amended time to time and the Public Liability Insurance Act for handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning of the project. Requisite On-site and Off-site Disaster Management Plans have to be prepared and implemented.	Noted and shall be complied with. Public Liability Insurance has been obtained for the year 2023 vide policy no. L0222432. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities have been obtained.	
75	Main entry and exit shall be separate and clearly marked in the facility.	Main entry and exit are clearly marked in the facility.	
76	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/ emergency vehicle around the premises.	Sufficient peripheral open passage is kept in the margin area for free movement of fire tender/ emergency vehicle around the premises.	
77	Storage of flammable chemicals shall be sufficiently away from the production area.	Noted and shall be complied with.	
78	Sufficient number of fire extinguishers shall be provided near the plant and storage area.	Sufficient number of fire extinguishers have been provided near the plant and storage area.	
79	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals.	Noted and shall be complied with.	
80	All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permissions in this regard shall be obtained before commencing the expansion activities.	Noted and shall be complied with.	
81	The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report.	Noted and shall be complied with.	
82	Only flame proof electrical fittings shall be provided in the plant premises	Flame proof electrical fittings have been provided in the plant premises as per HAC.	
83	Storage of hazardous chemicals shall be minimized and it shall be in multiple small capacity tanks / containers instead of one single large capacity tank / containers	Noted and shall be complied with.	

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84	All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals.	All the storage tanks have been fitte with appropriate controls to avoid an leakages. Bund/dyke walls have bee provided for storage tanks for Hazardous Chemicals.	
85	Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.	Noted and shall be complied with.	
86	Tie up shall be done with a nearby health care unit / doctor for seeking immediate medical attention in the case of emergency.	Tie up has been made with the following Hospitals for seeking immediate medical attention in the case of emergency. 1. 7-X Multispeciality Hospital Paanchbatti, Bharuch 2. Amax Medical Centre, Rahiyad,	
		Dahej Road, Bharuch 3. Orchid Multispeciality Hospital Sevashram Road, Nr. Reliance Fresh Mall, Bharuch 4. Apex Multispeciality Hospital Station Road, Panchbatti, Bharuch 5. A & V Trauma Centre Nr. Welspun Company, Dahej	
87	Personal Protective Equipments (PPEs) shall be provided to workers and its usage shall be ensured and supervised.	Personal Protective Equipments (PPEs) are provided to workers and its usage shall be ensured and supervised.	
88	First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	First Aid Box is made available and Antidotes will be made available during the operation phase.	
89	Training shall be imparted to all the workers on safety and health aspects of chemicals handling.	Training is imparted to all the workers on safety and health aspects.	
90	Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre -employment and periodical medical examination for all the workers shall be undertaken as per the Factories Act & Rules.	Occupational health surveillance of the workers is done and its records are maintained.	
91	Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.	Noted and shall be complied with.	
92	The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report.	Noted and shall be complied with.	
93	Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.	Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others have been obtained.	

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B.2.5	NOISE				
94	The overall noise level in and round the plant area shall be kept well within the standards by providing noise control measures including engineering controls like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall conform to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.	Noise level monitoring has been carried out through an NABL approved laboratory for the construction phase.			
		Noise Level	Permissi ble Limit	Min (dB(A))	Max (dB(A))
		Day Time	75	53.7	73.8
		Night Time	70	46.5	68.4
		Noise level monitoring is carried out on a monthly basis.			
B.2.6	CLEANER PRODUCTION AND WASTE MINIMISATION				
95	The unit shall undertake the Cleaner Production Assessment study through a reputed institute / organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to the GPCB.	Noted and shall be complied with.			
96	 The company shall undertake various waste minimization measures such as: a. Metering and control of quantities of active ingredients to minimize waste. b. Reuse of by-products from the process as raw materials or as raw materials substitutes. c. Use of automated and close filling to minimize spillages. d. Use of close feed system into batch reactors. e. Venting equipment through vapour recovery system. f. Use of high pressure hoses for cleaning to reduce wastewater generation. g. Recycling of washes to subsequent batches. h. Recycling of steam condensate. i. Sweeping / mopping the floor instead of floor washing to avoid effluent generation. j. Regular preventive maintenance for avoiding leakage, spillage etc. 	Noted an	nd shall be	complied	with.
B.2.7	GREENBELT AND OTHER PLANTATION				
97	The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on road sides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC / GPCB and submit an action plan of plantation for next three years to the	We will orequiren	-	green belt a	s per the

Sr. No	Conditions	Compliance Status	
	GPCB.		
98	Drip irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises	Drip Irrigation/low volume sprinkler system or similar measures will be implemented for the green belt development.	
B.3	OTHER CONDITIONS		
99	Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC vide no. F. No 22-34/2018-IA.III dated 09/08/2018 for Pharmaceutical and Chemical industries mentioned at (Sr. no. XX).	Noted and shall be complied with.	
100	The project proponent shall allocate the separate fund for Corporate Environment Responsibility (CER) in accordance to the MoEFCC's Office Memorandum No. F.No.22-65/2017-IA.III dated 01/05/2018 to carry out the activities under CER in affected area around the project. The entire activities proposed under CER shall be monitored and the monitoring report shall be submitted to the regional office of MoEFCC as a part of half-yearly compliance report and to district collector. The monitoring report shall be posted on the website of the project proponent.	A separate fund will be allocated a committed before SEAC. The entire activities proposed under CER is a part of the Environment Management Plat (EMP) as per the MoEF&CC's OM no. It No. 22-65/2017-IA.III dated 30.09.2020. This will be monitored and the monitoring report will be submitted to the regional office of MoEF&CC and to the District Collector. The monitoring report will be posted of the company website.	
101	Rain water harvesting of surface as well as rooftop runoff shall be undertaken and the same water shall be used for the various activities of the project to conserve fresh water as well as to recharge ground water. Before recharging the surface run off, pre-treatment must be done to remove suspended matter.	Being a chemical industry we can not use surface runoff water and rooftop water for recharge of ground water. We shall explore use of surface runoff water and roof top water for various activities of the project.	
102	The unit shall join and participate financially and technically for any common environmental facility / infrastructure as and when the same is taken up either by the Industrial Association or GIDC or GPCB or any such authority created for this purpose by the Govt / GIDC.	Noted and shall be complied with. We are member of CETP Dahej and send our primary treated effluent to CETP for final treatment.	
103	Application of solar energy shall be incorporated for illumination of common areas, lighting for gardens and street lighting. In addition the provision for Solar water heating system shall also be provided.	Noted and shall be complied with.	
104	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.	Noted and shall be complied with.	
105	All the commitments / undertakings given to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.	Noted and shall be complied with.	

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106	The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose of environmental protection and management.	Noted and shall be complied with.
107	In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.	Noted and shall be complied with.
108	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.	Noted and shall be complied with.
109	During material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or stormwater.	Noted and shall be complied with.
110	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	Pucca flooring has been provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.
111	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.	Noted and shall be complied with.
112	No further expansion or modifications in the plant likely to cause environmental impacts shall be carried out without obtaining prior Environment Clearance from the concerned authority.	Noted. We obtained EC Amendment vide letter no. SEIAA/GUJ/EC/5(f)/528/2023 dated 06.05.2023 followed by CTE & CCA for carrying out further expansion in the plant.
113	The above conditions will be enforced, 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, Handling and Transboundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Noted and shall be complied with.
114	The project proponent shall comply all the conditions mentioned in "The Companies (Corporate Social Responsibility Policy) Rules, 2014" and its amendments from time to time in a letter and spirit.	Noted and shall be complied with.
115	The project management shall ensure that unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.	Noted and shall be complied with.

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116	The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA as well as GPCB along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	Noted and shall be complied with.
117	The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the GPCB and may also be seen at the Website of SEIAA/ SEAC/ GPCB. This shall be advertised within seven days from the date of the clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in the Gujarati language and the other in English. A copy each of the same shall be forwarded to the concerned Regional Office of the Ministry.	EC approval was advertised in local newspaper "Divya Bhaskar" as well as "Times of India" on 16.06.2021. Copies of the same were forwarded to Gram Panchayat, GPCB, SEIAA & RO MoEFCC.
118	It shall be mandatory for the project management to submit a half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1st June and 1st December of each calendar year.	Noted and being complied with.
119	Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.	Noted
120	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	Noted and shall be complied with.
121	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	Noted
122	The company in a time bound manner shall implement these conditions. The SEIAA reserves the right to stipulate additional conditions, if the same is found necessary.	Noted and shall be complied with.
123	The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Company is not taking any financial support from the bank so financial approval/closure for the project is not applicable. Information about initiation of construction work given to the GPCB vide letter GSCL/DAHEJ/GPCB/ID 76102/2021/01 dtd. 20/08/2021.
124	This environmental clearance is valid for seven years from the date of issue.	Noted

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125	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Noted
126	Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application wakes this environment clearance cancelled.	Noted