

Alembic Pharmaceuticals Limited, API-1



M/s. Alembic Pharmaceuticals Limited

API Division-I, Panelav, Halol, Panchmahal, Gujarat.

ENVIRONMENT CLEARANCE COMPLIANCE REPORT

Apr - Sep'2024

Submitted to



**Ministry of Environment, Forest & Climate
Change (MoEFCC)**



Gujarat Pollution Control Board

Environment Clearance Compliance Report

EC No.: SEIAA/GUJ/EC/5(f)/856/2020, Issued dtd. 07 July 2020

Period: Apr-24 to Sep-24

Date: 01/12/2024

A. SPECIFIC CONDITIONS

SN	Conditions	Compliance																																								
<u>A1 Specific Conditions:</u>																																										
1.	PP shall comply conditions of any subsequent amendment or expansion or change in product mix, after the 30 th September 2020, considered as per the provision in force at the time as mentioned in the Notification vide S.O. 1223 (E) dtd. 27/03/2020.	Noted and shall comply																																								
2.	PP Shall carry out proposed project/ activities in respect of Active Pharmaceuticals Ingredients (API) as per the amended EIA Notification vide S.O. 1233 (E) dtd. 27/03/2020 and any subsequent amendments.	Noted and complied																																								
3.	PP Shall submit six monthly compliance report of Environmental Clearance without fail and the same shall be critically assessed by the regulatory authority.	Complying																																								
4.	PP shall use natural gas for utilities preferably but in case use of other fuel, PP shall put properly designed APCM with regular/ periodic stack monitoring system.	<p>Noted and comply</p> <ul style="list-style-type: none"> We have provided adequate APCM for Boiler. Also, periodic stack monitoring is done timely The results are as below: <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>Apr-24</th> <th>May-24</th> <th>Jun-24</th> </tr> </thead> <tbody> <tr> <td>SPM</td> <td>150 mg/NM3</td> <td>69.81</td> <td>79.46</td> <td>73.98</td> </tr> <tr> <td>SO₂</td> <td>100 ppm</td> <td>73.25</td> <td>70.52</td> <td>72.63</td> </tr> <tr> <td>NOx</td> <td>50 ppm</td> <td>36.80</td> <td>35.68</td> <td>33.76</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>Jul-24</th> <th>Aug-24</th> <th>Sep-24</th> </tr> </thead> <tbody> <tr> <td>SPM</td> <td>150 mg/NM3</td> <td>77.94</td> <td>71.43</td> <td>70.24</td> </tr> <tr> <td>SO₂</td> <td>100 ppm</td> <td>67.73</td> <td>69.79</td> <td>73.05</td> </tr> <tr> <td>NOx</td> <td>50 ppm</td> <td>37.05</td> <td>37.07</td> <td>35.40</td> </tr> </tbody> </table>	Parameters	Standard	Apr-24	May-24	Jun-24	SPM	150 mg/NM3	69.81	79.46	73.98	SO ₂	100 ppm	73.25	70.52	72.63	NOx	50 ppm	36.80	35.68	33.76	Parameters	Standard	Jul-24	Aug-24	Sep-24	SPM	150 mg/NM3	77.94	71.43	70.24	SO ₂	100 ppm	67.73	69.79	73.05	NOx	50 ppm	37.05	37.07	35.40
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5.	Unit shall provide adequate treatment to effluent before feeding it to MEE in such a way that no pollutant get air borne during evaporation to avoid adverse impact on Human Health & Environment.	<p>Complied</p> <ul style="list-style-type: none"> For adequate treatment of the effluent, Stripper is installed for solvent separation and the stripper bottom (High TDS) collected is send as MEE feed in combination with RO reject
6.	Close loop solvent recovery system with adequate condenser system shall be provided to recover solvent vapors in such a manner that recovery shall maximum and recovered solvent shall be reused in the process within premises.	<p>Complied</p> <ul style="list-style-type: none"> Dual Condensers having chilling water and cooling water supply is connected to reactors Adequate safety measures like breather valves and/or flame arrestors has been installed on all tanks and condensers.
7.	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR log books shall be maintained.	<ul style="list-style-type: none"> Complying.
8.	Complete Zero Liquid Discharge (ZLD) status shall be maintained all the time and there shall be no drainage connection from the premises.	<p>Complied</p> <ul style="list-style-type: none"> Company is having complete Zero liquid discharge (ZLD) facility. To treat industrial effluent, company is having adequate operations and systems like; ETPs, RO plants, Stripper, MEE and ATFD. Industrial effluent is categorised under low COD and high COD streams from manufacturing plants. Effluent generated form the manufacturing process, being treated in the conventional Effluent Treatment Plant (ETP) followed by Reverse Osmosis (RO). Furthermore, RO permeate water is 100% recycled in Boiler feed water and cooling tower make-up. In turn, RO reject is fed into Multiple Effect Evaporator (MEE). High COD content effluent is sent to Stripper, mixed solvent is stripped out form the top, spent solvent recovered form stripper is sell to authorised recycler and stripper bottom fed to MEE blending with RO reject MEE concentrate goes to Agitated thin film dryer (ATFD) and MEE condensate fed to conventional ETP for further treatment.
9.	Unit shall explore the possibilities for environmental friendly methods for disposal of Incinerable & land fillable waste before sending to CHWIF/TSDF sites respectively.	<p>Complied</p> <ul style="list-style-type: none"> The boiler fly-ash is sent for brick manufacturing for co-processing. Also, we have installed screw press for sludge dewatering effectively which decreases water content in sludge.
10.	All measures shall be taken to prevent soil and ground water contamination.	<p>Complied</p> <ul style="list-style-type: none"> The plant area is paved on the ground and provided with channels connecting to the collection tanks for collection of all the spillages and wash waters, which is further pumped to the

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		<p>ETP.</p> <ul style="list-style-type: none"> The hazardous waste generated from the project activities are being handled on the impervious surfaces having leachate collection system connected to Effluent Treatment Plant for its safe disposal. 																																																		
11.	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826 (E) dated 16 th November, 2009 shall be complied with.	<p>Noted and complied</p> <ul style="list-style-type: none"> We have identified specific 4 nos. locations of ambient air quality monitoring which servers the adequate monitoring purpose. Adequate locations to carry out ambient air quality monitoring were decided on the basis of “Guidelines for the Measurement of Ambient Air Pollutants” provided by CPCB. <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>Apr-24</th> <th>May-24</th> <th>Jun-24</th> </tr> </thead> <tbody> <tr> <td>PM₁₀</td> <td>100 µg/ m³</td> <td>56.35</td> <td>65.84</td> <td>59.80</td> </tr> <tr> <td>PM_{2.5}</td> <td>60 µg/ m³</td> <td>32.29</td> <td>38.16</td> <td>33.24</td> </tr> <tr> <td>SO₂</td> <td>80 µg/ m³</td> <td>12.87</td> <td>12.68</td> <td>11.78</td> </tr> <tr> <td>NO_x</td> <td>80 µg/ m³</td> <td>15.16</td> <td>14.93</td> <td>13.65</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>Jul-24</th> <th>Aug-24</th> <th>Sep-24</th> </tr> </thead> <tbody> <tr> <td>PM₁₀</td> <td>100 µg/ m³</td> <td>46.74</td> <td>50.75</td> <td>59.39</td> </tr> <tr> <td>PM_{2.5}</td> <td>60 µg/ m³</td> <td>21.21</td> <td>24.21</td> <td>29.54</td> </tr> <tr> <td>SO₂</td> <td>80 µg/ m³</td> <td>5.91</td> <td>8.12</td> <td>10.42</td> </tr> <tr> <td>NO_x</td> <td>80 µg/ m³</td> <td>7.20</td> <td>9.08</td> <td>12.79</td> </tr> </tbody> </table>	Parameters	Standard	Apr-24	May-24	Jun-24	PM ₁₀	100 µg/ m ³	56.35	65.84	59.80	PM _{2.5}	60 µg/ m ³	32.29	38.16	33.24	SO ₂	80 µg/ m ³	12.87	12.68	11.78	NO _x	80 µg/ m ³	15.16	14.93	13.65	Parameters	Standard	Jul-24	Aug-24	Sep-24	PM ₁₀	100 µg/ m ³	46.74	50.75	59.39	PM _{2.5}	60 µg/ m ³	21.21	24.21	29.54	SO ₂	80 µg/ m ³	5.91	8.12	10.42	NO _x	80 µg/ m ³	7.20	9.08	12.79
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12.	National Emission standards for Organic Chemical Manufacturing industry issues by the Ministry vide G.S.R. 608 (E) dtd 21/07/2010 and amended from time to time shall be followed.	Agreed and complying																																																		
13.	Unit shall have to adhere to the prevailing area specific policies of GPCB with respect to the discharge of pollutants, and shall carry out the project development in accordance & consistence with the same.	Agree and shall Comply																																																		
14.	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																																																		
15.	Unit shall install CEMS in line to CPCB directions to all SPCB vide letter no. B-29016/04/06PCI-1/5401 dated	<p>Complied</p> <ul style="list-style-type: none"> CEMS for continuous monitoring of final treated effluent has been installed. Also, currently we have updated CEMS System 																																																		

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	05.02.2014 for effluent discharge and air emission as per pollutants discharge/emission from respective project and an arrangements 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.	<p>with remote calibration.</p> <ul style="list-style-type: none"> Also, Online multiparameter is attached with RO permeate water which is also connected with GPCB/CPCB server. 																				
16.	Storm water shall not be allowed to mix with scrubber water and floor washings.	Noted and shall comply																				
17.	Storm water shall be channelized through separate drains passing through a HDPE lined pit having holding capacity of 10 minutes (hourly average) of rainfall.	Noted and complied																				
18.	SAFETY:																					
a.	PP shall obtain PESO permission for the storage and handling of hazardous chemicals (if applicable).	<p>Complied</p> <ul style="list-style-type: none"> PESO permission is been obtained for the storage and handling of hazardous chemicals. License No. P/HQ/GJ/15/1399 (P10955) dated 30/11/2023 is renewed upto 31/12/2033. 																				
b.	Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.	Complied and inspected.																				
c.	Unit shall provide double earthing to solvent storage tanks/ area.	<p>Complied</p> <ul style="list-style-type: none"> All the solvent storage tanks are having double earthing, connected with breather valves and flame arrestor. 																				
d.	<p>1. Unit shall provide effective fire hydrants, water monitors & foam application system at solvent storage tank farm area.</p> <p>2. Unit shall provide adequate safety system such as water sprinklers, water curtains, foam pouring system etc. to restrict cascade fire emergency in solvent tank farm.</p>	<p>Complied</p> <ul style="list-style-type: none"> Company has adequate water sprinklers, water curtains, foam pouring system etc. to restrict cascade fire emergency in solvent tank farm. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Details of fire-fighting systems</th> <th style="text-align: center;">Quantity (nos.)</th> </tr> </thead> <tbody> <tr> <td>DCP/ ABC type fire extinguishers</td> <td style="text-align: center;">342</td> </tr> <tr> <td>CO₂ Type Fire Extinguishers</td> <td style="text-align: center;">440</td> </tr> <tr> <td>Foam Type Fire Extinguishers</td> <td style="text-align: center;">29</td> </tr> <tr> <td>Ammonia Cylinder leakage Kit</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Fire Hydrant Points</td> <td style="text-align: center;">141</td> </tr> <tr> <td>Foam Monitor</td> <td style="text-align: center;">15</td> </tr> <tr> <td>Sand Buckets</td> <td style="text-align: center;">14</td> </tr> <tr> <td>Spill Control Kit</td> <td style="text-align: center;">32</td> </tr> <tr> <td>Safety Showers</td> <td style="text-align: center;">72</td> </tr> </tbody> </table>	Details of fire-fighting systems	Quantity (nos.)	DCP/ ABC type fire extinguishers	342	CO ₂ Type Fire Extinguishers	440	Foam Type Fire Extinguishers	29	Ammonia Cylinder leakage Kit	2	Fire Hydrant Points	141	Foam Monitor	15	Sand Buckets	14	Spill Control Kit	32	Safety Showers	72
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e.	Unit shall never store drum/ barrels/ carboys of incompatible material/chemical together.	Complied <ul style="list-style-type: none"> Adequate segregation is done as per the chemical compatibility chart. 														
f.	Unit shall store Bromine bottle in cool dry separate area, out of direct sunlight.	Not Applicable														
g.	Unit shall provide water sprinkler and bund/ dyke wall to ammonia storage tank.	Complied <ul style="list-style-type: none"> Adequate water sprinkler system and dyke wall provided to ammonia storage tank. 														
h.	Unit shall provide safety valve and rupture disc, as well as auto quench/ suppress system for nitrogen vessel safety.	Complied <ul style="list-style-type: none"> Adequate safety valve and rupture disc provided and proper safety system is provided for nitrogen vessel safety. 														

A2 WATER:

19.	Total water requirement of the project shall not exceed 2419 KLD. Unit shall reuse 1119 KLD of treated effluent (Ind.: 1009 KLD, Dom: 110 KLD) within premises. Hence, fresh water requirement shall not exceed 1300 KLD and it shall be met through Narmada Supply and Ground water.	Noted and shall comply <ul style="list-style-type: none"> Water consumption data is as below: <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2" style="background-color: #003366; color: white;">Month</th> <th colspan="2" style="background-color: #003366; color: white;">Fresh Water (Narmada river)</th> <th colspan="2" style="background-color: #003366; color: white;">Recycled Water (Boiler + Cooling tower)</th> </tr> <tr> <th style="background-color: #003366; color: white;">Usage (KL/ Month)</th> <th style="background-color: #003366; color: white;">Usage (KLD)</th> <th style="background-color: #003366; color: white;">Usage (KL/Month)</th> <th style="background-color: #003366; color: white;">Usage (KLD)</th> </tr> </thead> <tbody> <tr> <td style="background-color: #003366; color: white;">Apr-24</td> <td>12510</td> <td>417.00</td> <td>3990</td> <td>133</td> </tr> <tr> <td style="background-color: #003366; color: white;">May-24</td> <td>13795</td> <td>445.00</td> <td>3937</td> <td>127</td> </tr> <tr> <td style="background-color: #003366; color: white;">Jun-24</td> <td>12390</td> <td>413.00</td> <td>4260</td> <td>142</td> </tr> <tr> <td style="background-color: #003366; color: white;">Jul-24</td> <td>11439</td> <td>369.00</td> <td>4681</td> <td>151</td> </tr> <tr> <td style="background-color: #003366; color: white;">Aug-24</td> <td>11625</td> <td>375.00</td> <td>4464</td> <td>144</td> </tr> <tr> <td style="background-color: #003366; color: white;">Sep-24</td> <td>11880</td> <td>396.00</td> <td>4350</td> <td>145</td> </tr> </tbody> </table>	Month	Fresh Water (Narmada river)		Recycled Water (Boiler + Cooling tower)		Usage (KL/ Month)	Usage (KLD)	Usage (KL/Month)	Usage (KLD)	Apr-24	12510	417.00	3990	133	May-24	13795	445.00	3937	127	Jun-24	12390	413.00	4260	142	Jul-24	11439	369.00	4681	151	Aug-24	11625	375.00	4464	144	Sep-24	11880	396.00	4350	145
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20.	Prior permission from the concerned authority shall be obtained for withdrawal of water.	<ul style="list-style-type: none"> CGWA authorization is been obtained for the withdrawal of water. Last authorization was valid up to 29/06/2022. Application 21-4/3018/GJ/IND/2017 has been filed for its renewal. 																																							
21.	The industrial effluent generation from the project shall not exceed 1085 KLD.	Agreed and complying																																							
22.	The industrial effluent shall be	Agreed and complying																																							

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	<p>segregated into two streams</p> <p>(1) Low Concentration Effluent stream (2) High Concentration Effluent stream and it shall be managed as below:</p> <p>Low Concentration Effluent stream (789 KLD):</p> <p>a. Low concentration effluent 789 KLD (WTP-RO Reject 202 KLD, washing 419 KLD, Boiler 20 KLD, cooling 103 KLD, scrubber 45 KLD) along with MEE condensate 510 KLD shall be treated in adequate ETP-1 consist of primary, secondary, tertiary treatment units followed by RO system.</p> <p>b. RO permeate 1009 KLD shall be reused in cooling, boiler, washing and scrubber.</p> <p>c. RO reject 269 KLD shall be fed to MEE.</p> <p>High Concentration Effluent stream (296 KLD):</p> <p>a. High concentration effluent generated from manufacturing process 296 KLD shall be treated in ETP-2, solvent Stripper. Stripper bottom 266 KLD along with RO reject 269 KLD shall be fed to MEE.</p> <p>b. MEE concentrate shall be fed to ATFD for drying.</p> <p>c. MEE and ATFD condensate 510 KLD shall be sent to ETP-1 for further treatment.</p>	
23.	<p>Unit shall provide adequate capacity of ETP, RO, MEE, ATFD and it shall be operated regularly and efficient Zero Liquid Discharge (ZLD) conditions all the time.</p>	<p>Complied</p> <ul style="list-style-type: none"> • Effluent generated from production is segregated in to High COD and Low COD stream. • Low COD effluent is treated in conventional ETP (Primary, secondary, followed by RO system). • High COD effluent is treated through stripper followed by MEE and ATFD. • Effluent is 100% treated in-house. Final treated effluent is reused in utility like; cooling tower, boiler etc.
24.	<p>Domestic wastewater generation shall</p>	<p>Complied</p>

SN	Conditions	Compliance
	not exceed 110 KLD and it shall be treated in STP (P+S+T). Treated domestic wastewater shall be utilized on land for gardening/ plantation purpose within premises.	<ul style="list-style-type: none"> • Domestic effluent does not exceed 110 KLD. We are having STP with MBR technology. Treated domestic effluent is used for gardening within premises.
25.	The unit shall provide metering facility at the inlet and outlet of ETP-1, ETP-2, RO, and STP, reuse line and maintain record for the same. Record of fresh water consumption on day-to-day basis shall be maintained.	Complied
26.	Proper log books of ETP-1, ETP-2, RO, and STP, chemical consumption in effluent treatment, quantity & quality of effluent send to MEE and reuse, power consumption etc. shall be maintained and shall be furnished to the GPCB time to time.	<p>Complied</p> <ul style="list-style-type: none"> • All log sheet are available and maintained on daily basis.

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27.	<p>Unit shall not exceed fuel consumption in steam boiler, TFH, Incinerator and DG Set as mentioned below:</p> <table border="1" data-bbox="264 539 1207 1465"> <thead> <tr> <th>#</th> <th>Source of emission With Capacity</th> <th>Stack Height (m)</th> <th>Type of Fuel</th> <th>Qty. of Fuel MT/Day</th> <th>Air Pollutants</th> <th>APCM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Boiler-01 (4tph)</td> <td>30</td> <td>LDO (Existing was FO)</td> <td>6.00 (4.32 Existing + 1.68 Addition)</td> <td>PM, SO₂ & NO_x</td> <td>Bag Filter</td> </tr> <tr> <td>2</td> <td>Boiler-02 (5tph)</td> <td>35</td> <td>Agro-waste / Briquette</td> <td>24.36 (No change)</td> <td>PM, SO₂ & NO_x</td> <td>Bag Filter</td> </tr> <tr> <td>3</td> <td>Boiler-03 (10tph)</td> <td>35</td> <td>Coal</td> <td>36.00 (No Change)</td> <td>PM, SO₂ & NO_x</td> <td>ESP + Wet Scrubber</td> </tr> <tr> <td>4</td> <td>Incinerator (50 kg/h)</td> <td>30</td> <td>LDO (Existing was FO)</td> <td>3.00 (0.36 Existing + 2.64 Addition)</td> <td>PM, SO₂, NO_x, HF, HCl, TOC, CO, Dioxin & Furans</td> <td>Scrubber + Quencher</td> </tr> <tr> <td>5</td> <td>Boiler-04 (15tph)</td> <td>35</td> <td>Briquette + Coal</td> <td>90 (Briquette) + 19.5 (Coal)</td> <td>PM, SO₂ & NO_x</td> <td>ESP + Wet Scrubber</td> </tr> <tr> <td>6</td> <td>Boiler-05 (15tph)</td> <td>35</td> <td>Briquette + Coal</td> <td>90 (Briquette) + 19.5 (Coal)</td> <td>PM, SO₂ & NO_x</td> <td>ESP + Wet Scrubber</td> </tr> </tbody> </table>	#	Source of emission With Capacity	Stack Height (m)	Type of Fuel	Qty. of Fuel MT/Day	Air Pollutants	APCM	1	Boiler-01 (4tph)	30	LDO (Existing was FO)	6.00 (4.32 Existing + 1.68 Addition)	PM, SO ₂ & NO _x	Bag Filter	2	Boiler-02 (5tph)	35	Agro-waste / Briquette	24.36 (No change)	PM, SO ₂ & NO _x	Bag Filter	3	Boiler-03 (10tph)	35	Coal	36.00 (No Change)	PM, SO ₂ & NO _x	ESP + Wet Scrubber	4	Incinerator (50 kg/h)	30	LDO (Existing was FO)	3.00 (0.36 Existing + 2.64 Addition)	PM, SO ₂ , NO _x , HF, HCl, TOC, CO, Dioxin & Furans	Scrubber + Quencher	5	Boiler-04 (15tph)	35	Briquette + Coal	90 (Briquette) + 19.5 (Coal)	PM, SO ₂ & NO _x	ESP + Wet Scrubber	6	Boiler-05 (15tph)	35	Briquette + Coal	90 (Briquette) + 19.5 (Coal)	PM, SO ₂ & NO _x	ESP + Wet Scrubber	<p>Complied</p> <ul style="list-style-type: none"> Fuel consumption does not exceed from prescribed limit. Details of fuel consumption is mentioned as below: <table border="1" data-bbox="1397 539 1957 874"> <thead> <tr> <th>Month</th> <th>Coal (MT/M)</th> <th>FO/LDO (KL/M)</th> <th>HSD (KL/M)</th> </tr> </thead> <tbody> <tr> <td>Apr-24</td> <td>1151</td> <td>0</td> <td>2.066</td> </tr> <tr> <td>May-24</td> <td>1136</td> <td>0</td> <td>1.846</td> </tr> <tr> <td>Jun-24</td> <td>1084</td> <td>0</td> <td>8.140</td> </tr> <tr> <td>Jul-24</td> <td>1224</td> <td>0</td> <td>2.937</td> </tr> <tr> <td>Aug-24</td> <td>1223</td> <td>0</td> <td>11.712</td> </tr> <tr> <td>Sep-24</td> <td>1295</td> <td>0</td> <td>2.845</td> </tr> </tbody> </table>	Month	Coal (MT/M)	FO/LDO (KL/M)	HSD (KL/M)	Apr-24	1151	0	2.066	May-24	1136	0	1.846	Jun-24	1084	0	8.140	Jul-24	1224	0	2.937	Aug-24	1223	0	11.712	Sep-24	1295	0	2.845
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SN	Conditions					Compliance
	Existing				Scrubber	
9	Plant-1 (Reaction Vessels) Existing	NH ₃	12		Chilled Water & Acidic Soln.	
10	Plant-2 (Reaction Vessels) Existing	NH ₃	12		Chilled Water & Acidic Soln.	
11	Plant-7 (Reaction Vessels) Existing	NH ₃	12		Chilled Water & Acidic Soln.	
12	Plant-8 (Reaction Vessels) Existing	NH ₃	12		Chilled Water & Acidic Soln.	
13	Plant-1D (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
14	Plant-2B (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
15	Plant-2C (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
16	Plant-9 (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
17	Plant-10 (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
18	Plant-11 (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
19	Plant-12 (Reaction Vessels) Proposed	HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
20	Plant-3 (Reaction Vessels) Proposed	HBr, Br ₂ , HCl, Cl ₂ & SO ₂	12		Water & Alkali Scrubber	
21	Acid Storage Tanks Proposed	HCl & SO ₂	12		Water & Alkali Scrubber	
22	Plant-1D (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
23	Plant-2B (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
24	Plant-2C (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
25	Plant-9 (Reaction Vessels)	NH ₃	12		Chilled Water	

SN	Conditions				Compliance	
		Proposed			& Acidic Soln.	
26	Plant-10 (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
27	Plant-11 (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
28	Plant-12 (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
29	Plant-5 (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	
30	Ware house (Reaction Vessels) Proposed	NH ₃	12		Chilled Water & Acidic Soln.	

SN	Conditions	Compliance
30.	<p>The fugitive emission in the work zone environment shall be monitored. The emission shall conform to the standard prescribed by the concerned authorities from time to time (e.g. Directors of Industrial Safety and health). Following indicated guidelines shall also be followed to reduce the fugitive emission.</p> <ul style="list-style-type: none"> ➤ Internal roads shall be either concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement. ➤ Air borne dust shall be controlled with water sprinklers at suitable locations in the plant. ➤ A green belt shall be developed all around the plant boundary and also along the roads to mitigate fugitive & transport dust emission. 	<p>Complied</p> <ul style="list-style-type: none"> • Internal roads are made up of concrete to prevent fugitive emission. • We are having 51007.44 m² green belt area. Adequate green belt is under development. This year, we have planted 1044+ saplings in our premises and surroundings.
31.	<p>Regular monitoring of Volatile Organic Compounds (VOCs) shall be carried out in the work zone area and ambient air.</p>	<p>Complied</p> <ul style="list-style-type: none"> • Work zone area and ambient air monitoring is half yearly done and records are maintained in FORM-37.
32.	<p>For control of fugitive emission, VOCs, following steps shall be followed:</p> <ol style="list-style-type: none"> a. Closed handling and charging system shall be provided for chemicals. b. Reflux condenser shall be provided over Reactors/ Vessels. c. Pumps shall be provided with mechanical seals to prevent leakages. d. Air borne dust at all transfers operations/ points shall be controlled either by spraying water or providing enclosures. 	<p>Complied</p> <ul style="list-style-type: none"> • Close handling and vacuum charging system is available. • Adequate condensers are provided over reactors / vessels. • All pumps are having mechanical seal to prevent leakages. • Effective vacuum charging system is available for transferring of powder.
33.	<p>Solvent management shall be carried out as follows:</p> <ul style="list-style-type: none"> ✓ Measures shall be taken to reduce the process vapors emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapor recovery system. ✓ Reactors shall be connected to adequate chilling system to condensate solvent vapors and reduce solvent losses. ✓ Reactors and solvent handling pump shall 	<p>Complied</p> <ul style="list-style-type: none"> • Dual Condensers are connected with reactors. Each Condensers are having cooling water and chilling water supply. • All the equipment and solvent handling systems are having adequate mechanical seals. • All the condensers and heat exchangers are provided with adequate HTA. Hence, 95% recovery is achieved. • Proper earthing and bonding are provided to tanks, pumps and solvent handling systems. • Adequate safety measures like breather valves and/or

SN	Conditions	Compliance																																																		
	<p>have mechanical seals to prevent leakages.</p> <ul style="list-style-type: none"> ✓ The condensers shall be provided with sufficient HTA and residence time to so as to achieve maximum solvent recovery. ✓ Solvent shall be stored in a separate space specified with all safety measures. ✓ Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. ✓ Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. 	<p>flame arrestors has been taken to all tanks and condensers.</p>																																																		
34.	<p>Regular monitoring of ground level concentration of PM₁₀, PM_{2.5}, SO₂, NO_x, NH₃, HCl, Cl₂, HBr and VOC shall be carried out in the impact zone and its records shall be maintained. Ambient air quality levels shall not exceed the standard stipulated by GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be taken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.</p>	<p>Complied</p> <ul style="list-style-type: none"> • We have identifies specific 4 nos. locations of ambient air quality monitoring which servers the adequate monitoring purpose. Adequate locations to carry out ambient air quality monitoring were decided on the basis of “Guidelines for the Measurement of Ambient Air Pollutants” provided by CPCB. • Monthly monitoring reports are as below: <p style="text-align: center;">Ambient Air Quality-Third party monitoring (NABL)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr style="background-color: #003366; color: white;"> <th>Parameters</th> <th>Results (Std.)</th> <th>Apr-24</th> <th>May-24</th> <th>Jun-24</th> </tr> </thead> <tbody> <tr> <td>PM₁₀</td> <td>100 µg/m³</td> <td>49.62</td> <td>58.26</td> <td>52.64</td> </tr> <tr> <td>PM_{2.5}</td> <td>60 µg/m³</td> <td>27.57</td> <td>32.48</td> <td>27.70</td> </tr> <tr> <td>SO₂</td> <td>80 µg/m³</td> <td>10.24</td> <td>10.92</td> <td>11.05</td> </tr> <tr> <td>NO₂</td> <td>80 µg/m³</td> <td>12.86</td> <td>13.42</td> <td>12.10</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #003366; color: white;"> <th>Parameters</th> <th>Results (Std.)</th> <th>Jul-24</th> <th>Aug-24</th> <th>Sep-24</th> </tr> </thead> <tbody> <tr> <td>PM₁₀</td> <td>100 µg/m³</td> <td>52.77</td> <td>45.45</td> <td>53.42</td> </tr> <tr> <td>PM_{2.5}</td> <td>60 µg/m³</td> <td>25.25</td> <td>20.60</td> <td>26.17</td> </tr> <tr> <td>SO₂</td> <td>80 µg/m³</td> <td>8.20</td> <td>5.94</td> <td>9.79</td> </tr> <tr> <td>NO₂</td> <td>80 µg/m³</td> <td>9.23</td> <td>7.23</td> <td>11.96</td> </tr> </tbody> </table>	Parameters	Results (Std.)	Apr-24	May-24	Jun-24	PM ₁₀	100 µg/m ³	49.62	58.26	52.64	PM _{2.5}	60 µg/m ³	27.57	32.48	27.70	SO ₂	80 µg/m ³	10.24	10.92	11.05	NO ₂	80 µg/m ³	12.86	13.42	12.10	Parameters	Results (Std.)	Jul-24	Aug-24	Sep-24	PM ₁₀	100 µg/m ³	52.77	45.45	53.42	PM _{2.5}	60 µg/m ³	25.25	20.60	26.17	SO ₂	80 µg/m ³	8.20	5.94	9.79	NO ₂	80 µg/m ³	9.23	7.23	11.96
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SN		Conditions							Compliance					
		containers/ liners												
9	Contaminated cotton rags & other cleaning material	Contaminated & oil swabbed cotton and rags, PPEs used by workers	33.2	0.5	4.5	5	Co-processing & CHWIF							
10	ETP sludge	ETP	35.3	650	6850	7500	TSDF							
11	Oil and grease skimming	ETP	35.4	0	25	25	Co-processing & CHWIF							
12	Distillation residue	Spend Solvent Distillation	36.1	360	1640	2000	Co-processing & CHWIF							
13	Filler & Filter Material	Process equipment	36.2	300	300	600	In-house Incineration & CHWIF							
14	Sludge from wet scrubbers	Scrubber Bleed	37.1	0	16425 KL	16425 KL	To ETP and disposed along with ETP sludge							
		Solids and sludge removed during Periodic cleaning of scrubbing liquid tank	37.1	0	100	100	Disposed to Secured Landfill site at TSDF							
15	Incinerator Ash	Incinerator	37.2	100	175	275	TSDF							
16	Evaporated Salt	ATFD	37.3	450	8675	9125	TSDF							

Month	Waste Sent to TSDF		
	ETP sludge (in MT) 35.3	Evaporated salt (in MT) 37.3	Incineration Ash (in MT) 37.2
Apr-24	26.1	108.53	0
May-24	67.96	142.34	0
Jun-24	0	135.64	0
Jul-24	0	51.77	0
Aug-24	0	0	0
Sep-24	0	45.17	0
Total	94.06	483.45	0

SN	Conditions	Compliance
36.	Authorized end-users shall have permissions from the concerned authorities under Rule 9 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.	Noted & Complied
37.	Unit shall explore the possibilities for environmental friendly methods like co-processing of hazardous waste for disposal of Incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.	Complied We are sending majority of the waste for co-processing.

SN	Conditions	Compliance
	<u>A5 OTHER:</u>	
38.	The project proponent shall allocate the separate fund of Rs. 2.64 Crores i.e. >0.75% of additional capital investment for the activities in accordance to the MoEFCC's office Memorandum No. F.No. 22-65/2017-IA III dtd. 01/05/2018. The entire activities proposed under CER 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 district collector. The monitoring report shall be posted on the website of the project proponent.	Noted and agreed
39.	All the environmental protection measures and safeguards proposed by project proponent and commitments made in application shall be strictly adhered to in letter and spirit.	Agreed and comply

B. GENERAL CONDITIONS

SN	Conditions	Compliance
	<u>B1 CONSTRUCTION PHASE:</u>	
40.	Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.	Noted and complied
41.	Project proponent shall ensure that 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.	Complied
42.	All required sanitary and hygienic measures shall be provided before starting construction activities and to be maintained throughout the construction phase.	Agreed and complied
43.	First Aid box shall be readily available in adequate quantity at all the times.	Complied <ul style="list-style-type: none"> Total 30 nos. first aid boxes are available in throughout the premises. Antidotes like Methylene blue, Dexona, Avil, Adrenaline, Atropine, Pam, Deriphyllin, Snake antivenom, Vitamin K are readily available at site.
44.	The project proponent shall strictly comply with the Building and other Construction Workers (Regulation of Employment & Condition of Services) 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.	Agreed and complied
45.	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 construction phase.	Noted and shall complied
46.	Use of 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.	Noted and shall complied
47.	Safe disposal of waste water and municipal solid waste generated during the construction phase shall be	Noted and shall comply

SN	Conditions	Compliance
	ensured.	
48.	All top soil excavated during construction activity shall be used in horticulture/ landscape development within the project site.	Noted and shall comply
49.	Excavated earth to be generated during the construction phase shall be utilized within the premises to the max. Extent possible and balance quantity of excavated earth shall be dispose of 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 neighboring communities.	Agreed and complied
50.	Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, and Ready mix concrete (RMC) and lead free paints in the project.	Noted and shall comply
51.	Fly ash shall be used in construction wherever applicable as per provisions of fly ash Notification under the EPA 1986 and its subsequent amendments from time to time.	Complied
52.	“Wind - breaker of appropriate height i.e. 1/3 rd of the building height and maximum up to 10m shall be provided”. Individual building within the project site shall also be provided with barricades.	Noted and shall comply
53.	“No uncovered vehicles carrying construction material and waste shall be permitted.”	Noted and shall comply
54.	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.	Agreed and complied
55.	Roads leading to or at construction site must be paved and blacktopped (i.e. metallic roads)	Complied
56.	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	Noted and shall comply
57.	Dust mitigation measures shall be displayed prominently at the construction site for easy public viewing.	Noted and shall comply

SN	Conditions	Compliance																																								
58.	Grinding and cutting of building materials in open area shall be prohibited.	Noted and shall comply																																								
59.	Construction material and waste should be stored only within earmarked area and road side storage of construction material and waste shall be prohibited.	Agreed and shall comply																																								
60.	Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures be notified at the site (if applicable).	Not applicable																																								
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	B2.1 WATER:																																									
61.	The water meter shall be installed and records of daily and monthly water consumption shall be maintained.	<p>Noted and shall comply</p> <ul style="list-style-type: none"> Water consumption data is as below: <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #003366; color: white;"> <th></th> <th colspan="2">Fresh Water</th> <th colspan="2">Recycled Water</th> </tr> <tr style="background-color: #003366; color: white;"> <th>Month</th> <th>Usage (KL/ Month)</th> <th>Usage (KLD)</th> <th>Usage (KL/Month)</th> <th>Usage (KLD)</th> </tr> </thead> <tbody> <tr> <td>Apr-24</td> <td>12510</td> <td>417.00</td> <td>3990</td> <td>133</td> </tr> <tr> <td>May-24</td> <td>13795</td> <td>445.00</td> <td>3937</td> <td>127</td> </tr> <tr> <td>Jun-24</td> <td>12390</td> <td>413.00</td> <td>4260</td> <td>142</td> </tr> <tr> <td>Jul-24</td> <td>11439</td> <td>369.00</td> <td>4681</td> <td>151</td> </tr> <tr> <td>Aug-24</td> <td>11625</td> <td>375.00</td> <td>4464</td> <td>144</td> </tr> <tr> <td>Sep-24</td> <td>11880</td> <td>396.00</td> <td>4350</td> <td>145</td> </tr> </tbody> </table>		Fresh Water		Recycled Water		Month	Usage (KL/ Month)	Usage (KLD)	Usage (KL/Month)	Usage (KLD)	Apr-24	12510	417.00	3990	133	May-24	13795	445.00	3937	127	Jun-24	12390	413.00	4260	142	Jul-24	11439	369.00	4681	151	Aug-24	11625	375.00	4464	144	Sep-24	11880	396.00	4350	145
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62.	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.	<p>Comply</p> <ul style="list-style-type: none"> Company is continuously looking forward for the new technology to optimize water consumption and recycling. Company is having effective RO system followed by high pressure RO to reduce reject. Also, company is in process for installation of MBBR system for advanced effluent treatment. 																																								
	B2.2 AIR:																																									
63.	In case of use of spray dryer, the unit shall provide the adequate and efficient APCMs with spray dryer so that there should not be any adverse impact on human health & environment. Unit shall carry out third party monitoring of the proposed Spray Dryer & it's APCM	<ul style="list-style-type: none"> Not Applicable. As no spray dryers are used. 																																								

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	through the credible institutes and study report for impacts on Environment & human health shall be submitted to GPCB every year along with half yearly compliance report.																						
64.	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.	<p>Complying.</p> <ul style="list-style-type: none"> Adequate acoustic enclosures are provided to D.G. Sets to mitigate noise pollution. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Month</th> <th style="text-align: center;">Noise level dB(A)</th> <th style="text-align: center;">Permissible level (8 hrs.) dB(A)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Apr-24</td> <td style="text-align: center;">72</td> <td style="text-align: center;">90</td> </tr> <tr> <td style="text-align: center;">May-24</td> <td style="text-align: center;">69</td> <td style="text-align: center;">90</td> </tr> <tr> <td style="text-align: center;">Jun-24</td> <td style="text-align: center;">70</td> <td style="text-align: center;">90</td> </tr> <tr> <td style="text-align: center;">Jul-24</td> <td style="text-align: center;">72</td> <td style="text-align: center;">90</td> </tr> <tr> <td style="text-align: center;">Aug-24</td> <td style="text-align: center;">68</td> <td style="text-align: center;">90</td> </tr> <tr> <td style="text-align: center;">Sep-24</td> <td style="text-align: center;">69</td> <td style="text-align: center;">90</td> </tr> </tbody> </table>	Month	Noise level dB(A)	Permissible level (8 hrs.) dB(A)	Apr-24	72	90	May-24	69	90	Jun-24	70	90	Jul-24	72	90	Aug-24	68	90	Sep-24	69	90
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65.	Stacks/ Vents (whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/ process gas emission.	<p>Complied</p> <ul style="list-style-type: none"> Adequate stack/vent height is provided to prevent flue and process gas emission. 																					
66.	Flue gas emission and process gas emission (if any) shall conform to the standards prescribed by the GPCB/CPCB/MoEFCC. At no time, emission level should go beyond the stipulated standards.	<p>Complied</p> <ul style="list-style-type: none"> Flue gas stack and process gas stack emission has its emission level below the stipulated standards as analyzed by Third party. 																					
67.	All the reactors/ vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	<p>Complied</p> <ul style="list-style-type: none"> All the reactors and vessels used in the manufacturing process are under close loop operation and connected with adequate condenser/ scrubber system to reduce fugitive emission. 																					
	B2.3 HAZARDOUS/ SOLID WASTE:																						
68.	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.	<p>Complied</p> <ul style="list-style-type: none"> Company is strictly following the norms of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, for collection / treatment / storage / disposal of hazardous wastes. 																					

SN	Conditions	Compliance
69.	Hazardous waste shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.	<p>Complied</p> <ul style="list-style-type: none"> Properly dried & packed waste are stored separately according to the category of the waste and sent for disposal. Effective leachate collection system is available to treat leachate.
70.	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (whichever is applicable)	<p>Complied</p> <ul style="list-style-type: none"> Permission / Agreement are available for TSDF, co-processing and CHIWIF.
71.	Trucks/Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and the rules made there under.	<p>Agree and complied</p>
72.	The design of the trucks/tankers shall be such that there is no spillage during transportation.	<p>Agree and complied</p>
73.	All possible efforts shall be made for co-processing of the hazardous waste prior to disposal into TSDF/CHWIF.	<p>Complied</p> <ul style="list-style-type: none"> We are giving prime priority to co-processing. Also, we are continuously trying to generate possible options to dispose hazardous waste to co-processing rather than TSDF/SHWIF.
74.	Management of fly ash (if any) shall be as per the Fly Ash Notification 2009 and its amendment time to time and it shall be ensured that there is 100% utilization of fly ash to be generated from the unit.	<p>Complied</p> <ul style="list-style-type: none"> We are sending our fly-ash for brick manufacturing.
	B.2.4 SAFETY:	
75.	The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963.	<p>Noted and complied</p>
76.	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 approval from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning the project. Requisite On-site and Off-site Disaster Management Plans have to be prepared and implemented.	<p>Complied</p> <ul style="list-style-type: none"> On-site emergency plan available.

SN	Conditions	Compliance
77.	Main entry and exit shall be separate and clearly marked in the facility.	Complied
78.	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/emergency vehicle around the premises.	Complied
79.	Storage of flammable chemicals shall be sufficiently away from the production area.	Complied
80.	Sufficient numbers of fire extinguishers shall be provided near the plant and storage area.	Complied
81.	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic/hazardous chemicals.	Complied
82.	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.	Complied
83.	The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment Report.	Complied
84.	Only flame proof electrical fittings shall be provided in the plant premises.	Complied <ul style="list-style-type: none"> • In plant premises, flame proof fittings are available.
85.	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.	Complied <ul style="list-style-type: none"> • Adequate storage of hazardous chemicals in tanks, having suitable safety measures.
86.	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.	Complied <ul style="list-style-type: none"> • All storage tanks having appropriate controls to avoid any leakage/ spillage. Dyke wall is provided to hazardous chemical storage tanks.
87.	Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.	Complied <ul style="list-style-type: none"> • Handling and charging of the chemicals are done under close condition through vacuum transfer to avoid human intervention.
88.	Tie up shall be done with nearby health care unit/ doctor for seeking immediate medical attention in the	Complied <ul style="list-style-type: none"> • In case of any emergency, company has tie up with

SN	Conditions	Compliance
	case of emergency.	nearby hospital and also Mutual-aid is done with nearby company.
89.	Personal Protective Equipment (PPEs) shall be provided to workers and its usage shall be ensured and supervised.	<p>Complied</p> <ul style="list-style-type: none"> Required PPE's are provided to all the employees and workers to ensure personnel safety at workplace.
90.	First Aid Box and required antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	<p>Complied</p> <ul style="list-style-type: none"> Total 30 nos. first aid boxes are available in throughout the premises. Antidotes like Methylene blue, Dexona, Avil, Adrenaline, Atropine, Pam, Deriphyllin, Snake antivenom, Vitamin K are readily available at site
91.	Training shall be imparted to all the workers on safety and health aspects of chemical handling.	<p>Complied</p> <ul style="list-style-type: none"> Training is imparted to workers, contractual employees and company employees. Training calendar for health, safety and Environment is prepared and followed accordingly. Total 2578 employees attend training during Apr-24 to Sep-24.
92.	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.	<p>Complied</p> <ul style="list-style-type: none"> Occupational health surveillance of all employee is carried out twice in a year (every six month). Last health surveillance is done in Jan-2023. Pre-employment is carried out of all the employees before joining of the company. Periodical medical examination carried out by Bhailal Amin General Hospital (BAGH), Vadodara. Total 1115 nos. employees were covered in the Last health surveillance.
93.	Transportation of the hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.	<p>Complied</p> <ul style="list-style-type: none"> All the hazardous substance are transport as per the provisions of the Motor Vehicle Act & Rules. Hazardous waste is transport as per the guideline by the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
94.	The company shall implement all preventive and mitigation measures suggested in the Risk Assessment	Complied

SN	Conditions	Compliance
	Report.	
95.	Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.	<p>Complied</p> <ul style="list-style-type: none"> • PESO certificate No. P/HQ/GJ/15/1399. Dated on-30/11/2023 is renewed upto 31/12/2033
	B.2.5 NOISE:	
96.	The overall noise level in and around 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 and Rules.	<p>Complied</p> <ul style="list-style-type: none"> • Adequate control measures are provided to reduce noise. Ambient Noise monitoring and source noise monitoring is carried out by third party.
	B.2.6 CLEANER PRODUCTION & WASTE MINIMISATION:	
97.	The unit shall undertake 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 comply
98.	<p>The company shall undertake waste minimization measures such as:</p> <ol style="list-style-type: none"> a. Metering & Control of quantities of active ingredients to minimize waste. b. Reuse of by-products from the process as raw materials or as raw material substitutes. c. Use of automated and close fittings to minimize the spillages. d. Use of closed feed system into batch reactors. e. Venting equipment through vapor 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 of floor instead of floor 	<p>Noted and shall comply</p> <ul style="list-style-type: none"> • Close loop system and vacuum handling system is available to avoid spillage. • High pressure jet nozzle is available for effective cleaning of reactors to reduce wastewater generation. • Steam condensate is recycle in process. • Floor cleaning is done through mopping to avoid effluent generation. • Regular preventive maintenance system is available to reduce leakages/ spillages form equipment. • Stripper column is available in the production unit to recover solvent form high COD contained effluent which reduces the quantity of effluent.

SN	Conditions	Compliance
	washing to avoid effluent generation. j. Regular preventive maintenance for avoiding leakages, spillages, etc.	
	B.2.7 GREEN BELT AND OTHER PLANTATION:	
99.	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 for next three years to the GPCB.	Under compliance <ul style="list-style-type: none"> We are having 51007.44 m² green belt area. Adequate green belt is under development. This year, we have planted 1044+ saplings in our premises and surroundings.
100.	Drip Irrigation/low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.	Complied <ul style="list-style-type: none"> Low-angle sprinkler systems are available for effective irrigation.
	<u>B3 OTHER CONDITION:</u>	
101.	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 dtd 09/08/2018 for Pharmaceuticals and Chemical Industries mentioned at (Sr. No. XX).	Noted and agreed
102.	The provision of the Solid Waste Management Rules, 2016, e-Waste (Management) Rules, 2016, the Construction and Demolition Waste Management Rules, 2016 and the Plastic Waste Management Rules, 2016 shall be followed.	Shall comply
103.	Rain water harvesting (off-site) shall be undertake to conserve fresh water as well as recharge ground water. Before recharging the surface run-off, pre-treatment must be done to remove suspended matter (applicable for units consuming ground water ≥50 KLD in-line with the prevailing guidelines of SPCB).	Comply <ul style="list-style-type: none"> Total 21 nos. of recharge bore well in the campus are available. All the recharge bore wells have adequate filtration system for the removal of suspended matter.
104.	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 agreed

SN	Conditions	Compliance
105.	Application of solar energy shall be incorporated for illumination of common areas, lighting for gardens and street lighting in addition the provision of solar water heating system shall also be provided.	Noted and shall comply
106.	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.	Noted and agreed <ul style="list-style-type: none"> • We have already marked existing and proposed green belt area.
107.	All the commitments/ undertaking given as to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.	Noted and agreed.
108.	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 for the environmental protection and management.	Noted and agreed
109.	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 agreed
110.	The project authorities must strictly adhere to the stipulations made by the GPCB, State Government and any statutory authority.	Noted and agreed
111.	During the material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water.	Shall comply
112.	Pucca flooring/ impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	Complying <ul style="list-style-type: none"> • Impervious layer is available in the work areas, storage areas and chemical handling areas to avoid any kind of soil contamination.
113.	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.	Noted and agreed
114.	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

SN	Conditions	Compliance
115.	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 agreed
116.	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.	<p>Noted and comply</p> <ul style="list-style-type: none"> • CSR Activities are carrying out by Alembic CSR Foundation under: <ul style="list-style-type: none"> - <i>Educational activities</i> like school adaptation, Community outreach programs, school education development for students of school, run by Rural Development Society, Training & Workshop to Children & Teachers, education facilities, industrial training program, Women Empowerment etc. - <i>Health activities</i> like; Blood Transfusion Centre, free cancer care, medical assistance & treatment to socially & economically backward persons etc. - <i>Community developments</i> like; personal hygiene & sanitation by constructing toilets, Adoption of Children’s homes (orphans & social/economically backward groups), Adoption of Government Institution for destitute, Village Development Programs, etc. - <i>Environmental conservations</i> like; assess the aqua zones wherein 15 artificial recharge wells has been constructed for ground water recharge. An earthen dam with waste weir was constructed in Parekhpura village last year. The structure is expected to store 6.37 crore litres of water and infuse 1.91 crore litres of water into the ground water every year was assessed this year post monsoon
117.	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	Noted and shall comply

SN	Conditions	Compliance
	well as proposed by project proponent.	
118.	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 agreed
119.	The applicant shall inform the public that the project has been accorded environment clearance by 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 clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in Gujarati language and the other in English. A copy of each of them shall be forwarded to the concerned Regional Office of the ministry.	<p>Complied</p> <ul style="list-style-type: none"> • Advertisement for the environmental clearance was published in widely circulated daily newspapers like; <ol style="list-style-type: none"> (1) Indian Express-English language (2) Gujarat Samachar-Regional Language.
120.	It shall be mandatory for the project management to submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1 st June 1 st December of each calendar year.	<p>Complied</p> <ul style="list-style-type: none"> • We are submitting EC compliances regularly on Parivesh Portal.
121.	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 and agreed
122.	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	<p>Noted and agreed</p> <ul style="list-style-type: none"> • Company is following the condition given in CC&A and maintaining the same. • The environmental statement for each FY is sending to GPCB in Form-V. • Form-V of FY 2023-24 was submitted on 11/06/2024.
123.	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	Noted and agreed

SN	Conditions	Compliance
124.	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 agreed <ul style="list-style-type: none"> • The company shall adhere to the stipulations made by governing authority and shall implement the same.
125.	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 the start of project.	Noted
126.	This environmental clearance is valid for seven years from the date of issue.	Noted
127.	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 and agreed
128.	Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application makes environment clearance cancelled.	Noted and agreed