Alembic Pharmaceuticals Ltd.

API-Unit-III

Karkhadi, Padra, Vadodara

ENVIRONMENT CLEARANCE COMPLIANCE REPORT

Of

July-2024 to December-2024

ENVIRONMENTAL CLEARANCE COMPLIANCE REPORT

EC No. J-11011/776/2007-IA-II [I]-August 2008

<table>
<tr><th>SR. NO</th><th>CONDITIONS</th><th>STATUS</th></tr>
<tr><td>A</td><td>SPECIFIC CONDITIONS</td><td></td></tr>
<tr><td>i.</td><td>The gaseous emissions (SO2, Nox, NH3 and HCL) and particulate matters along with RSPM levels from various process units shall conform to the standards prescribed by the concerned authorities from time to time. Process emissions in the form of HCl shall be scrubbed with high efficiency scrubbing system. In the event of failure of pollution control systems(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.</td><td>
We are monitoring scrubber every month through third party. Air emission monitoring detail reports of scrubber are attached as Annexure-A.
<table>
<tr><th>Plant-1</th><th>Parameters</th><th>Units</th><th>Permissible Limit</th><th>Min.</th><th>Max.</th><th>Aver.</th></tr>
<tr><td rowspan="5">Two Stage Caustic Scrubber</td><td>Sulphur Dioxide (as SO_2)</td><td>mg/Nm^3</td><td>40</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Nitrogen Oxides (NO_X)</td><td>mg/Nm^3</td><td>25</td><td></td><td></td><td></td></tr>
<tr><td>Hydrochloric Acid (as HCl)</td><td>mg/Nm^3</td><td>20</td><td>8.4</td><td>12.4</td><td>10.08</td></tr>
<tr><td>Chlorine (as Cl_2)</td><td>mg/Nm^3</td><td>9</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Ammonia (as NH_3)</td><td>mg/Nm^3</td><td>175</td><td>-</td><td>-</td><td>-</td></tr>
<tr><th>Plant-2</th><th>Parameters</th><th>Units</th><th>Permissible Limit</th><th>Min.</th><th>Max.</th><th>Aver.</th></tr>
<tr><td rowspan="5">Process Vent Scrubber (Caustic)</td><td>Sulphur Dioxide (as SO_2)</td><td>mg/Nm^3</td><td>40</td><td>10.67</td><td>14.44</td><td>12.97</td></tr>
<tr><td>Nitrogen Oxides (NO_X)</td><td>mg/Nm^3</td><td>25</td><td>4.77</td><td>12.19</td><td>7.66</td></tr>
<tr><td>Hydrochloric Acid (as HCl)</td><td>mg/Nm^3</td><td>20</td><td>1.6</td><td>3.1</td><td>2.26</td></tr>
<tr><td>Chlorine (as Cl_2)</td><td>mg/Nm^3</td><td>9</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Ammonia (as NH_3)</td><td>mg/Nm^3</td><td>175</td><td>5.4</td><td>14</td><td>10</td></tr>
<tr><th>Plant-3</th><th>Parameters</th><th>Units</th><th>Permissible Limit</th><th>Min.</th><th>Max.</th><th>Aver.</th></tr>
<tr><td rowspan="5"></td><td>Sulphur Dioxide (as SO_2)</td><td>mg/Nm^3</td><td>40</td><td>11.93</td><td>21.36</td><td>13.57</td></tr>
<tr><td>Nitrogen Oxides (NO_X)</td><td>mg/Nm^3</td><td>25</td><td>5.98</td><td>12.19</td><td>10.07</td></tr>
<tr><td>Hydrochloric Acid (as HCl)</td><td>mg/Nm^3</td><td>20</td><td>0.9</td><td>6.8</td><td>2.34</td></tr>
<tr><td>Chlorine (as Cl_2)</td><td>mg/Nm^3</td><td>9</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Ammonia (as NH_3)</td><td>mg/Nm^3</td><td>175</td><td>1.2</td><td>8.5</td><td>5.88</td></tr>
<tr><th>Plant-4</th><th>Parameters</th><th>Units</th><th>Permissible Limit</th><th>Min.</th><th>Max.</th><th>Aver.</th></tr>
<tr><td rowspan="3">Caustic Scrubber</td><td>Sulphur Dioxide (as SO_2)</td><td>mg/Nm^3</td><td>40</td><td>5.26</td><td>19.72</td><td>12.92</td></tr>
<tr><td>Nitrogen Oxides (NO_X)</td><td>mg/Nm^3</td><td>25</td><td>6.1</td><td>11.23</td><td>9.16</td></tr>
<tr><td>Hydrochloric Acid (as HCl)</td><td>mg/Nm^3</td><td>20</td><td>1.4</td><td>6.57</td><td>3.16</td></tr>
</table>
</td></tr>
</table>

			Chlorine (as Cl_2)	mg/Nm^3	9	BDL	BDL	BDL
		Ammonia Scrubber	Ammonia (as NH_3)	mg/Nm^3	175	18.4	31.2	23.85
		Scrubber at Warehouse	**Parameters**	**Units**	**Permissible Limit**	**Min.**	**Max.**	**Aver.**
			Particulate Matter (as PM)	mg/Nm^3	150	21.7	24.4	22.6

ii.	Emissions from the fuel Imported Coal fired boiler shall be dispersed through stack of height as per the CPCB/ State Pollution Control Board standards.	• We have installed Coal fire boiler Dust Collected followed by • Bag filter and Wet Scrubber (5.5TPH-Stack height 35 meter) and FO fire boiler kept as standby .We are monitoring boiler stack emission every month through third party. Air emission monitoring detail reports of boiler are attached as **Annexure-B.**

Stack Attached to	APCM	Parameters	Units	Permissible Limit	Min.	Max.	Avg.
Boiler	Bag Filter	Particulate Matter (as PM)	mg/Nm^3	150	55.8	70.1	64.37
		Sulphur Dioxide (as SO_2)	ppm	100	27.08	65.06	38.43
		Nitrogen Oxides (NO_X)	ppm	50	16.19	38.08	23.72

iii.	The process effluent (345.5 m3/d) shall be segregated into low COD and high COD/TDS stream. The low COD stream after Primary, secondary and tertiary treatment and conforming to the inlet norms of CETP shall be discharged into the CETP for further treatment. The High COD stream shall be	We have installed Effluent treatment plant with primary, secondary and tertiary treatment to handle low COD stream. We have installed Stripper, MEE and ATFD plant to handle to our High COD/TDS stream. We have installed online effluent monitoring system its report photo are as under. **Annexure :- C**

	sent to MEE and stripper. The concentrated mass obtained from the MEE shall be sent for Incineration to be incinerated	
iv.	The company shall install MEE and Incinerator as per CPCB norms before starting proposed expansion.	**Complied.** MEE, stripper & ATFD shall be installed. We have membership of CHWI with SEPPL, for Co-processing for Shree Cement & Preprocessing GEO LLP &GEPILwe are member of Copy attached **Annexure-D**
v.	Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by GPCB.	• Fugitive emissions monitoring is regularly carried out by self-instrument and records of the same are maintained in Form-37. Reports of Form-37 are attached as **Annexure-E**
vi	During transfer of material, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains	**Complied** Transfer of material is being done through closed pipeline structure. Spillage Kit is also available at plants. Garland drains shall be provided. **Annexure F**
vii	Spent solvents shall be recovered as far as possible and recovery shall not be less than 95 percent. During purification process, solvent vapors are emitted from purification tanks as fugitive emissions. Action shall be taken to reduce the emission as far as possible. All venting equipment	**Complied** We have already Installed Solvent Recovery having two condensers, with primary and secondary condensation system. All tank vents are covered with Breather Valves. Closed pipelines circuits are provided to avoid emissions during transfer of solvents. **Annexure H**

	shall have vapor recovery system.	
viii	The company shall undertake following Waste Minimization measures : (1) Metering and control of quantities of Active Ingredients to minimize waste (2) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (3) Use of automated filling to minimize spillage (4) Use of "close feed" system into Batch reactors. (5) Venting equipment through vapour recovery system. (6) Use of high pressure hoses for equipment cleaning to reduce waste water generation.	We undertook that (1) Metering and Control of quantities shall be implemented. (2) By product like waste acids/alkalis will be reused in other processes. (3) Automated filling system is already installed on some reactors. (4) Closed feed equipment shall be purchased. (5) Venting equipment's like Breathing valves, condensers shall be installed. (6) We are using high pressure jet M/c for the cleaning of reactors to control generation of waste water.
ix	The project authorities shall provide the chilled brine solution in secondary condenser for condensation of VOCs and ensure that the solvent recovery shall not be less than 95%.	**Complied** Chilled Brine solutions are already provided in secondary condensation. **Annexure H**
x	The company shall provide the monitoring arrangement with vents	**Complied** **Annexure :- I**

	and regular monitoring shall be carried out and reports submitted to the SPCB, CPCB and Ministry's Regional Office at Bhopal.	
xi	To prevent solvent loss, following measures shall be taken : (A) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (B)The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95 % recovery. (C) Solvents shall be stored in a separate space specified with all safety measures. (D) Proper earthling shall be provided in all the electrical equipment wherever solvent handling is done. (E) Entire plants shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	**Complied. Annexure:- J** (A) Complied (B) Condensers are provided in such a way to get maximum recovery. (C) Solvent tank farm is defined for storage of solvents and it is equipped with Safety Instruments. (D) Earthling is already provided to all tanks as per requirement. (E) Flame proof fixtures and instruments are already provided in Solvent Recovery area
xii	The process emissions VOCs, HC and particulate matters from various units shall conform to the standards prescribed by the concerned authorities from time to	**Complied**

	time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	
xiii	The company should develop rainwater-harvesting structures to harvest the run-off water for recharge of ground water.	Not applicable.
Xiv	Green belt shall be provided in an area of 33% to mitigate the effects of fugitive emissions all around the plant. Development of green belt shall be as per the Central Pollution Control Board guidelines.	**Complied.** Green belt of adequate width and density is developed at the boundary walls, open space and avenue roads to mitigate the effects of fugitive emission. **Annexure:- M**
xv	Occupational health surveillance of the workers shall be done on a regular bases and records maintained as per the Factories Act.	**Complied** Regular Medical Health Checkup is done and records are maintained copy attached- **Annexure-N**

B	**GENERAL CONDITIONS:**	
i.	The project authorities must strictly adhere to the stipulations made by the Gujarat State Pollution Control Board.	We give assurance that we will strictly follow all the conditions made by the Gujarat Pollution Control Board and the State Government. **Annexure:-O**
ii.	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	**Complied** We give assurance that we will strictly follow all the conditions made by the Gujarat Pollution Control Board and the State Government.
iii.	No further expansion or modifications in the plant should be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference should be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	We assure that we will not do any Modification or any expansion without prior approval of MoEF.

iv.	The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous chemicals Rules 1989 as amended in October, 1994 and January, 2000. Authorization from the SPCB shall be obtained for collection, treatment, Storage, Disposal of hazardous wastes	**Complied** **Annexure:- P** **Annexure :-T**
v.	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2003 Authorization from the State Pollution Control Board must be obtained for collections/ treatment/ storage/disposal of hazardous wastes.	**Complied** Authorization is already given by Gujarat Pollution Control Board for collection, treatment, storage and disposal .Copy of Form-4 is attached- **Annexure-Q**
vi.	The overall noise levels in and around the plant area should be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under Environment (protection) Act, 1986 Rules 1989, viz. 75 dBA (day time) and 70 dBA (night time).	**Complied** Result attached- **Annexure-R**
vii.	The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the /public hearing report.	**Complied** All recommendations given in the EIA are complied.

viii.	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and monitoring functions.	**Complied**. Company has full-fledged laboratory facilities with monitoring and analysis instruments for Important parameters **Annexure:- S**
ix.	The project authorities shall earmark separate funds to implements the conditions stipulated by the Ministry of Environmental and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	Yes, **Complied**.
x.	The implementation of the project vis-à-vis environmental action plans shall be monitored by the Ministry's regional office at Bhopal/State Pollution Control Board/Central Pollution control board. A six month compliance status report should be submitted to monitoring agencies.	**Complied** Company is in existence since, 1996. Regularly monitoring reports of Air and water are submitted to Gujarat Pollution Control Board. Now, Onward we assure to submit the same report at MoEF, Bhopal.

xi.	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the state Pollution Control Board/Committee and may also be seen at Website of the Ministry of Environmental and Forests at http://envfor.nic.in. This shall be advertised within seven days from the date of issue of the clearance letter. At least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the Ministry's Regional Office at Bhopal.	**Complied** Company has already been given notice in the local newspapers regarding granting of Environmental Clearance. The Newspaper was "Sandesh" dated 30/08/2008 of Baroda edition (Gujarati) and "Times of India" of 30/08/2008 of Baroda edition. copy attached- **Annexure-U** We have also uploaded compliance status & other important information on our web site www.alembic-india.com-->sustainability--> Environment
xii.	The Project Authorities shall inform the Regional Office as well as the Ministry the data of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	We assure to inform the same at the time of Completion presently CTE Received as well as application of CTO done and also approved by government authority copy attached. **Annexure-V**