Government of India
Ministry of Environment and Forests
(I.A. Division)

Paryavaran Bhawan
CGO Complex, Lodhi Road
New Delhi – 110 003
E-mail: plahujaral@yahoo.com
Telefax: 011 – 2436 3973
Dated: March 12, 2008

To,
M/s Vasudev Drug Intermediates
Plot No. 3103
GIDC Industrial Estate
Panoli, Bharuch
Gujarat

Sub: Drug Intermediates Manufacturing Unit at Plot No. 3103, GIDC, Panoli, Gujarat
by M/s Vasudev Drug Intermediates Ltd.- Environmental Clearance Reg.

Sir,

Kindly refer to your application No. Nil dated 26th June 2007 seeking environment clearance for the above mentioned project.

2. The Ministry of Environment and Forests has examined the proposal. It is noted that the proposal is to set up a Drug Intermediates Manufacturing Unit at Plot No. 3103, GIDC Estate, Panoli, Bharuch, Gujarat. The total land available is 1500 sq. m out of which 332.78 sq. m will be developed as Green Belt. The cost of the project is Rs. 45 Lakhs out of which Rs. 1.45 will be earmarked for environment protection measures. The list of the proposed products is as given below:

<table>
<thead>
<tr>
<th>S.No.</th>
<th>Name of Products</th>
<th>Quantity (MTM)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Para Nitro Benzyl Bromide (PNBB)</td>
<td>10</td>
</tr>
<tr>
<td>2.</td>
<td>Para Nitro Benzyl Alcohol (PNBA)</td>
<td>5</td>
</tr>
<tr>
<td>3.</td>
<td>4-Nitro Phthalimide</td>
<td>10</td>
</tr>
<tr>
<td>4.</td>
<td>N, N Bis-2 (Chloro Ethyl) Amine HCl</td>
<td>10</td>
</tr>
</tbody>
</table>

By-Products

<table>
<thead>
<tr>
<th>S.No.</th>
<th>Name of Products</th>
<th>Quantity (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>HBr (30-35%)</td>
<td>26</td>
</tr>
<tr>
<td>2.</td>
<td>NaBr (30-40%)</td>
<td>4</td>
</tr>
<tr>
<td>3.</td>
<td>H2SO4 (60-70%)</td>
<td>14</td>
</tr>
<tr>
<td>4.</td>
<td>NaHSO3 (30%)</td>
<td>39</td>
</tr>
</tbody>
</table>

3. Power requirement will be 35 KVA which will be sourced from Dakshin Gujarat Vij. Co. Ltd. One boiler of 0.6 MT/HR shall be installed for which fuel shall be natural gas which will be sourced from Gujarat Gas Co. Ltd. Water requirement of 5.45 KLD will be sourced from GIDC water supply. 3.70 KLD wastewater generated will be sent to PETL from where the treated effluent shall be sent to FETP and finally disposed off in deep sea. Domestic wastewater of 0.30 KLD will be disposed to septic tank.
4. The project activity is listed at 5 (f) and is of 'B' Category under the Schedule of EIA Notification, 2006, however considered at Central Level as the Unit is located in the critically polluted area. The project shall not require Public Hearing as per Para 7(I) III. Stage (3) - Public Consultation of EIA Notification, 2006.

5. Based on the information submitted by you, the Ministry of Environment and Forests hereby accords environmental clearance to the above project under the provisions of EIA Notification dated 14th September 2006 subject to the decision of GPCB regarding CETP/FETP in the matter raised by MoEF/CPCB.

A. SPECIFIC CONDITIONS:

i. The Clearance is subject to the decision regarding CETP/FETP of GPCB in the matter raised by MoEF/CPCB. Alternatively, if the unit treats its waste water up to the discharge norm of GPCB.

ii. Br₂, HCl and SO₂ emissions from the process vents shall be scrubbed in water and Caustic Lye solution scrubbers and dilute HCl so formed shall be reused. SO₂ shall be scrubbed in the scrubber using Caustic Lye solution and the scrubbing liquid shall be sent to CETP along with other waste water for treatment. Scrubber efficiency shall be minimum 95%. The gases containing traces of HCl gas shall be passed through Alkali Secondary Packed Tower, where gases shall be neutralized <& clean air shall be vented through Blower stack. Nitrogen and Carbon dioxide shall be let into atmosphere.

iii. Levels of HC and VOC at various probable locations in the ambient air in and around the plant will be monitored regularly.

iv. There shall be no odour nuisance from products & material used. Odour shall be controlled as per the Guidelines of CPCB.

v. Water withdrawal shall not exceed 5.45 KLD which will be met from GIDC Water supply.

vi. Wastewater generation shall not exceed 3.70 KLD which shall be sent to CETP of PETL, Panoli from where it shall be sent to FETP of M/s. BEAIL for final treatment and disposal into deep sea through their common effluent disposal pipeline. Before starting implementation of the project, the proponent shall obtain within one month, the written permission from the Management of CETP/FETP that the CETP/FETP shall be able to take discharge load and comply with the prescribed standards of GPCB/State Pollution Control Board. 30 KLD of domestic wastewater shall be treated into septic tank.

vii. 13.5 MTM of Spent Mother Liquor shall be recovered for reuse for NaBr solution. 23 MTM of Spent Solvent shall also be recovered for reuse. 3.5 MTM of Distillation Residue shall be sent to Common Incineration facility of M/s BEAIL. 12.5 L/yr of used/spent oil and discarded containers shall be sold to authorized recyclers.

viii. Spent solvents shall be recovered as far as possible & recovery shall not be less than 95 percent. Solvent vapours emitted during purification process from purification tanks as fugitive emissions shall be reduced as far as possible. All extraction equipment shall have vapour recovery system.
ix. 332.76 sq. m shall be developed as Green Belt and selection of plant species shall be as per the CPCB guidelines.

B. GENERAL CONDITIONS:

(i) The project authorities shall strictly adhere to the stipulations made by the State Pollution Control Board.

(ii) No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.

(iii) 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.

(iv) The gaseous emissions (Br₂, HCl, S0₂, NOₓ, CO, VOC and HC) and Particulate matter along with RSPM levels from various process units shall conform to the standards prescribed by the concerned authorities from time to 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 respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.

(v) The locations of ambient air quality monitoring stations shall be reviewed in consultation with the State Pollution Control Board (SPCB) and additional stations shall be installed, if required, in the downwind direction as well as where maximum ground level concentrations are anticipated.

(vi) Dedicated scrubbers and stacks of appropriate height as per the Central Pollution Control Board guidelines shall be provided to control the emissions from various vents. The scrubbed water shall be sent to ETP for further treatment.

(vii) All the storage tanks will be under negative pressure to avoid any leakages. Breather valves, N₂ blanketing and secondary condensers with brine chilling system shall be provided for all the storage tanks to minimize vapour losses. All liquid raw material shall be stored in storage Tanks and Drums. Closed handling systems for chemicals and solvents will be provided. Magnetic seals will be provided for pumps/agitators for reactors for reduction of fugitive emissions. Solvent traps shall be installed wherever necessary. Reactor generating solvent vapors will be connected to condensers with receivers.

(viii) All venting equipment shall have vapour recovery system. All the pumps and other equipment where there is a likelihood of HC leakages shall be provided with Leak Detection and Repair (LDAR) system and LEL indicators and Hydrocarbon detectors. Provision for immediate isolation of such equipment, in case of a leakage will also be made. The company shall provide a well defined Leak Detection and Repair (LDAR) programme for quantification and control of fugitive emissions. The detectors sensitivity will be in ppm levels.
4. The project activity is listed at 5 (f) and is of 'B' Category under the Schedule of EIA Notification, 2006, however considered at Central Level as the Unit is located in the critically polluted area. The project shall not require Public Hearing as per Para 7(i) III. Stage (3) - Public Consultation of EIA Notification, 2006.

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(xx) The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment. The eco-development plan should be submitted to the SPCB within three months of receipt of this letter for approval.

(xx) A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

(xxii) The project authorities shall earmark adequate funds to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.

(xxiii) The implementation of the project vis-a-vis environmental action plans shall be monitored by the concerned Regional Office of the Ministry/SPCB / CPCB. A six monthly compliance status report shall be submitted to monitoring agencies and shall be posted on the website of the Company.

(xxiv) The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://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 concerned Regional Office of the Ministry.

(xxv) The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.

6. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.

7. The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.


(Dr.P.L. Ahdavaral)
Director
Copy to:

1. The Secretary, Forests & Environment Department, Government of Gujarat, Sachivalaya, 8th Floor, Gandhi Nagar-382 010, Gujarat.
2. The Chief Conservator of Forests (Western Zone), Ministry of Environment & Forests, Regional Office, E-5, Arera Colony, Link Road-3, Bhopal -462 016, M.P.
3. The Chairman, Central Pollution Control Board Parivesh Bhavan, CBD-cum-Off ice Complex, East Altajuj Nagar, New Delhi -110 032.
4. The Chairman, Gujarat State Pollution Control Board, Paryavaran Bhawan, Sector 10 A, Gandhi Nagar-382 043, Gujarat.
6. Guard File
7. Monitoring File
8. Record File.

(Dr.P.L. Ahujarei)  
Director