

Minutes of the 4.38th (A) Video Conferencing Meeting of the State Level Expert Appraisal Committee (SEAC), (Raj.), held on 22.04.2020.

The 4.38th (A) Video Conferencing Meeting of the members of State Level Expert Appraisal Committee (SEAC), Rajasthan constituted for considering environmental clearance projects (B-category) under GoI Notification 28.11.2019 was held on 22 April, 2020 at **11:00 AM** through VC under the Chairmanship of **Sh. Manoj Kumar Agrawal**. The names of the members who attended the meeting are as follows:-

S. No.	Name	Designation	22.04.2020
1	Sh. Manoj Kumar Agrawal	Chairman	Attended
2	Dr. Suja George	Vice Chairman	Attended
3	Sh. Pushakar Singh Shekhawat	Member	Attended
4	Sh. Mukesh Behari Sharma	Member	Attended
5	Sh. Laxmi Kant Dashora	Member	Attended
6	Sh. Buddhi Prakash Pareek	Member	Attended
7	Sh. Vikram Singh Chauhan	Member	Attended
8	Sh. Nand Kumar Khare	Co-opted Member, SEAC	-

The Secretary welcomed the members.

The SEAC considered the following 2 projects and 1 Additional agenda. With the permission of Chairman, SEAC.

S.NO.	SEAC. NO.	Project Name	Proponent Name
1.	251	Name of the Project--Regarding Amendment in Environmental clearance of our existing project (formerly known as & Zyden Gentec Ltd.) of Capacity of 480 MTA Situated at Plot No-13, Bhimpura Industrial Area, Kota (Rajasthan).	Name of The Project Proponent- Lokhith Healthcare Pvt. Ltd. CEO- Sh. V.V. Kameswara Rao, Add-201, Akansha Opulence, Ravanji Scheme, Shakti Nagar, Kota, Rajasthan. Email- rao.lokhithhealthcare@gmail.com, info@enkayenviro.com Consultant:- ENKAY ENVIRO SERVICES PVT. LTD., Add-92 Heera Nagar - A, Near Shalimar Bagh, Ajmer Road, Distt.- Jaipur (Raj.) Email:-

			info@enkayenviro.com
2.	15361	Amendment In Environmental Clearance ("B" under category 5(f) Of EIA Notification dated 14.09.2006 and its subsequent amendments) (Amendment in EC under clause 7(ii) of the EIA Notification 2006) AT #SP 2-5, RIICO Industrial Area, Phase L, Village-Neemrana, Tehsil— Neemrana, Formally Under Behror Tehsil), District— Alwar Rajasthan-301705 PROJECT Area:- 76,970Sq m. (No additional land is acquired) Existing Capacity: 200 Kg/Day, Proposed Capacity: 535 Kg/Day; Total-735 Kg/Day Study Period:- October—November- December'2017	Applicant:- Alchem international Pvt. Ltd Authorized Signatory:- Sunil Mallk (Vice President- Supply Chain Managements) SP 2- 5, RIICO Industrial Area, Phase 1, Neemrana, District- Alwar, Email:—sunil.malik@alchenlinternational.com, nksingh@alchentinternational.com 91- 1494- 246996; Fax No.:- 91- 1494- 246995 Consultant Name: ENKAY ENVIRO SERVICES PVT. LTD., Add-92 Heera Nagar - A, Near Shalimar Bagh, Ajmer Road, Distt.- Jaipur (Raj.) Email:- info@enkayenviro.com

Agenda No.1 : F1 (4)/SEIAA/SEAC-Raj/Sectt/Project / Cat. 5(f) B2 (251)/ 19-20

Name of Project- Transfer and amendment of EC of the existing project “Zyden Gentec Ltd.” having production capacity of 480 MTA at plot no.13, Bhimpura Industrial Area, Tehsil Ladpura, District- Kota, Rajasthan.

Proponent Name: - Lokhith Healthcare Pvt. Ltd., Sh. V.V. Kameswara Rao, Manager, 143/1, Deepshree Building, Kotri road, Gumanpura, Kota-324007.

Name of the consultant:- ENKAY ENVIRO SERVICES PVT. LTD., Add-92 Heera Nagar - A, Near Shalimar Bagh, Ajmer Road, Distt.- Jaipur (Raj.) Email:- info@enkayenviro.com.

The particulars of the project, in brief, as submitted by the PP are as follows:

1.	Category / Item no.(in Schedule):	5(f)
2.	Location of Project	Plot No. 13, Bhimpur Industrial Area, Jhalawar Road, Tehsil - Ladpura, District - Kota, Rajasthan.
3.	Project Details /Production capacity	Capacity-480 TPA
4.	Project Cost:	Project Cost: -Existing- 1.25 crores

5.	Water Requirement & Source	The daily fresh water demand will be 23.5 KLD and the recycled water is 15 KLD. Source: - Water will be met from Ground water (bore well).
6.	Fuel & Energy:-	Energy Requirement- 125 kVA Fuel Requirement- DG Set:- HSD 20-50 Liter/day, Boiler:- Coal 3 Ton per day
7.	Application No. & Date & documents submitted :-	Application No. Nil dated 05.07.2019
	Date of Air/Water/Noise Monitoring	Not Applicable.
8.	Information about 500 mts composite map	Not Applicable.
9.	Environment Management Plan	Annual expenditure of in 3.0 lacs per year
10.	CSR /ESR Activates	Annual expenditure of in 5.0 lacs
11.	Green Belt/ Plantation	Annual expenditure of 0.50 lacs per year
12.	Budgetary Breakup for Labour	Annual expenditure of in 1.0 lacs per year
13.	Present Status	Closed, Brownfield Project

Observations of the Committee:

The SEAC decided to consider the proposal submitted by the PP as B2 category project, through video conferencing, in pursuance to the Notification dated 27.03.2020 and OM dated 13.04.2020 of the MoEF & CC in its 4.38th (A) meeting held on 22.04.2020.

The proposal is for transfer of EC from “Zyden Gentec Ltd.” at plot no.13, Bhimpura industrial Area, Tehsil Ladpura, District- Kota, granted by SEIAA, vide letter dated 23.06.2010, for production of 480 MTA of Active Pharmaceutical Ingredient (API), to “Lokhith Healthcare Pvt. LTD” and for amendment of EC involving re-orientation of plant layout and change in plot area from 19,424.99 sq.mt to 12,865.00 sq.mt. with no change in overall plant capacity of 480 MTA.

The PP has stated that initially the land was sanctioned in favour of Zyden Gentec Ltd. by the office of District Industry Centre, Kota, vide communication dated 23.02.2007. Thereafter, M/s Aldoc Pharmaceuticals purchased Zyden Gentec Ltd. in a bid from PNB Branch at Aerodrome Circle Kota. M/s Aldoc Pharmaceuticals, thereafter gave on rent the above property to M/s Lokhith Healthcare Pvt. Ltd. The lease agreement between M/s Aldoc Pharmaceuticals and M/s Lokhith Healthcare Pvt. Ltd was executed and the same became effective from 01.04.2019. The lease agreement was for land, building and plant and machinery.

The SEIAA vide letter dated 23.06.2010 had granted EC to Sh. V.V. Kameswara Rao, Manager for API's Manufacturing unit "Zyden Gentec Ltd." At plot no. 13, Bhimpura Industrial Area, Tehsil Ladpura, Kota, Rajasthan. The EC was granted for production of 480 MTA of the following products:

Table: A

S.No.	Name of the Products	S.No.	Name of the Products
1	Guaifenesin	9	Methocarbomal
2	Drotaverine	10	2- Acetyl Thiophene
3	2, 5- Dichloro Thiophene	11	Topiramate
4	Modafinil	12	Ambroxol HCL
5	Mebeverine HCL	13	Acelofenac
6	Thiophene-2-Carboxaldehyde	14	4- (3, 4- Dichloro phenyl) 3, 4-dihydrol, 2 nephthalene
7	4- Methyl Acetone	15	2-(2- thienyl) ethyl-4-Methyl Benzence Sulfonate
8	4- Methy-2- Cyanobiphenyl	16	2- Bromo Thiophene

The project was considered by the SEAC, in its 4.5th meeting held on 26-28 December, 2018 and on the basis of its observation, asked the PP, during meeting, to furnish following documents/ information which was wanting in the project proposal.

- i) No Objection certificate from the original PP.
- ii) Undertaking from new PP regarding compliance of EC.
- iii) Letter regarding Land ownership for the purpose of carrying out the activity for which EC issued earlier.
- iv) Reasons for not approaching SEIAA for change at the time when M/s Aldoc Pharmaceuticals purchased Zyden Gentec Ltd. in a bid from PNB.
- v) Past production details (month wise) since the beginning with supporting documents.
- vi) Undertaking by way of affidavit duly notarized that the PP has not carried out violation of any of EC/CTE/CTO conditions, provisions of Environment (Protection) Act, 1986, Air (Prevention and Control of Pollution) Act, 1981, Water (Prevention and Control of Pollution) Act, 1974.
- vii) Certified compliance report of earlier EC conditions (point wise) from the Regional Officer of the MoEF &CC, Lucknow /SEIAA/RSPCB.
- viii) Copy of the authentic document for facilitating transfer of EC.

The PP in response to the above communication submitted a copy of lease agreement dated 31.03.2019 whereby M/s Aldoc Pharmaceuticals had leased out land building and plant and machinery situated at plot no. 13, Bhimpura Industrial Area, Jhalawar Road Tehsil Ladpura, District Kota to M/s Lokhith Healthcare Pvt. Ltd (formally known as Zyden Gentec Pvt. Ltd.), copy of application dated 26.07.2019 addressed to Director/RO, MoEF & CC, Kendriya Bhawan, 5th floor sector H, Aligunj, Lukhnow requesting for certification of earlier EC conditions. The PP, however, did not submit report of compliance of EC condition as certified by the MoEF & CC/ RSPCB. The PP, nonetheless, submitted self certified report of compliance of EC condition in the following table:

Table: B

S.No.	Particulars	Area (Sq. M) in the sanctioned EC	%	Actual Status of the area (Sq. M)	%
1.	Plant area, Office area	1230.97	6.34	1212.38	9.42
2.	Paved area (road, corridor, parking, drainage)	4222.46	21.74	3260.43	25.34
3.	Green Belt area	6425.00	33.07	154.50	1.2
4.	Open area	7546.56	38.85	8237.69	64.03
5.	Total	19,424.99	100.0	12,865	100.0

The project was again considered by the SEAC in its 4.26th meeting held on 25.10.2019, having regard to its query and the above information received from the PP in response thereto. The observations of the committee, inter-alia, were as follows.

- A. The PP has reduced green belt area from 33.07% to 1.2% only. The reduction in the green belt area from 33.07% to 1.2% is against the Environmental norm applicable for the projects covered under Synthetic Organic Chemical Category, of the EIA Notification which provides that the PP shall ensure 33% area of the total plant area under green cover. The SEAC is of the view that the PP needs to explain this anomaly in his proposal.
- B. The PP has though submitted reorientation plan for division of the plot area. In two i.e. 12,865 (Block A) + 6,559.99 (Block B) = 19,424.99 sq.mt. He has not submitted reorientation of plant and machinery, reactors and ETP.
- C. The PP during presentation was asked to explain as to whether he had power to subdivide and sublet part of land to another person under the applicable laws. The PP, during presentation verbally agreed to submit this information, soon.
- D. The PP during presentation informed that chemical mentioned at serial no. 7 of Table: A namely, **4- Methyl Acetone** has wrongly been replaced by **4- Methoxy Phenyl Acetone** and will rectify the same during the course of the day. It may be mentioned that the EC dated 23.06.2010 was granted for the former chemical i.e. **4- Methyl Acetone and not 4- Methoxy Phenyl Acetone**. The PP had not made rectification in this regard.
- E. The PP, during presentation was asked to submit the particulars regarding transfer of EC as contained in Form-7 specified by the MoEF & CC vide OM dated 11.06.2019. Based on above discussions, SEAC issued query letter to PP vide letter no. 10780 dated 07/11/19.

On the basis of above observation the SEAC, vide letter dated 07.11.2019, asked the PP to furnish his reply/clarification/explanation.

The PP vide letter dated 28.01.2020 has submitted reply to the query made by the SEAC, vide letter dated 07.11.2019. The PP along with the reply has submitted no objection certificate for transfer of EC to the transferee, affidavit by the transferee stating that it shall comply with all the environmental safeguards mentioned in the EC issued to Zyden Gentec Ltd., certificate stating that no activity other than that mentioned in the earlier EC will be carried out at the plot without approval of SEIAA, copy of lease agreement between M/s Aldoc Pharmaceuticals and M/s Lokhith Healthcare Pvt. Ltd, affidavit by the transferee saying that no activity has been undertaken in violation of the Provisions of the EIA Notification, certificate dated 27.01.2020 by M/s Lokhith Healthcare Pvt. Ltd stating that no production has been carried out after March, 2014 and the unit was under liquidation till December, 2018, report of inspection carried out on 17.12.2019 by the RO, RSPCB at Kota, the report says that the industry is non operational since 2014 and is under maintenance.

Regarding the query of SEAC that “the earlier EC dated 23.06.2010 was granted, inter-alia, for producing 4- Methyl Acetone whereas in the application for amendment in EC the PP has proposed to produce for 4- Methoxy Phenyl Acetone besides other chemicals. The PP therefore proposes to replace 4- Methyl Acetone by 4- Methoxy Phenyl Acetone mentioned at serial no.7 in Table- A above. The other chemical/ product mentioned in the above Table- A at serial no. 1-6 and 8-16 are the same there is no change in regard to these chemicals/products”; the PP has stated that they will produce the same product as approved in the earlier EC and there will be no change in the products. The PP has stated that in the EC amendment application there is typographical error. The PP vide email dated 21.04.2020 has submitted revised Form-1 rectifying the above mistake.

As to the observations of the SEAC that “the PP has reduced green belt area from 33.07 % to 1.2% is against the environmental laws applicable for the projects covered under synthetic organic category of the EIA Notification”; The PP has submitted that they propose to cover green belt in an area of 4245.45 sq.mt out of total plot area of 12,865.00 sq.mt. The PP vide email dated 21.04.2020 has submitted revised plan for developing green cover as above. The PP has also submitted reorientation plan of the plant layout.

The details of production of the pharmaceuticals ingredient during 2010-2014 submitted by the PP are not authenticated by the Central Excise Department. The PP, however, in this regard has submitted affidavit stating that the details of production given by the PP are correct and in the event of their being false and misleading, the PP shall be liable to be proceeded against in accordance with law. The report of inspection carried out by RO, Kota of RSPCB on 17.12.2019 cannot said to be the report of compliance of EC condition. The PP, however, vide email dated 21.04.2020 has submitted revised self certified report of compliance of conditions of EC.

The PP has not so far submitted documents showing valid transfer/ mutation of land in favour of Aldoc Pharmaceuticals in DIC/ Government records. The PP, however, during presentation undertook to submit the same at the earliest.

The SEAC after due consideration thought it to be expedient to rely on the self certified (certified by the PP) production figures and compliance report of EC conditions, having regard to the Notification dated 27.03.2020 and 13.04.2020 of the MoEF & CC, aimed at ensuring drug availability or production to reduce the impact of Novel Corona Virus (COVID-19).

The SEAC was also of the view that SEIAA may ask the RSPCB to inquire into the issue of compliance of the conditions of EC and on the basis of findings of such inquiry take appropriate action in the matter, in accordance with law.

Resolution:

The SEAC considered the application for transfer and amendment of EC and the documents submitted therewith, clarification about the project made during presentation by the PP and his consultant, explanation given by the PP in the queries made by SEAC and due appraisal of the project, resolved to recommend to SEIAA for transfer of EC from “Zyden Gentec Ltd.” at plot no.13, Bhimpura industrial Area, Tehsil Ladpura, District- Kota, Rajasthan granted by SEIAA, vide letter dated 23.06.2010, for production of 480 MTA of Active Pharmaceutical Ingredient (API), to “Lokhith Healthcare Pvt. Ltd” (Sh. V.V. Kameswara Rao (CEO), Add-201, Akansha Opulence, Ravanji Scheme, Shakti Nagar, Kota, Rajasthan) and for amendment of EC involving re-orientation of plant layout and change in plot area from 19,424.99 sq.mt to 12,865.00 sq.mt. with no change in overall plant capacity of 480 MTA, subject to the conditions of EC dated 23.06.2010, besides the following conditions:

I. Statutory compliance

- i. The transfer of EC and its amendment is subject to the condition that the transfer of land, free from all encumbrances, in favour of M/s Aldoc Pharmaceuticals is legally and validly effected and the same is accordingly recorded in the DIC/ Government records.
- ii. The project proponent shall obtain forest clearance under the provisions of Forest (Conservation) Act, 1986, in case of the diversion of forest land for non-forest purpose involved in the project.
- iii. The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.
- iv. The project proponent shall prepare a Site-Specific Conservation Plan & Wildlife Management Plan and approved by the Chief Wildlife Warden. The recommendations of the approved Site-Specific Conservation Plan / Wildlife Management Plan shall be implemented in consultation with the State Forest Department. The implementation report shall be furnished along with the six-monthly compliance report. (incase of the presence of schedule-I species in the study area)

v. The project proponent shall obtain Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State pollution Control Board/Committee.

vi. The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.

vii. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.

II. Air quality monitoring and preservation

i. The project proponent shall install 24x7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognised under Environment (Protection) Act, 1986 or NABL accredited laboratories.

ii. The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognised under Environment (Protection) Act, 1986.

iii. The project proponent shall install system to carryout Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released (e.g. PM10 and PM25 in reference to PM emission, and SO₂ and NO_x in reference to SO₂ and NO_x emissions) within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120 each), covering upwind and downwind directions.

iv. To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.

v. Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.

vi. National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.

vii. 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

III. Water quality monitoring and preservation

- i. The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises (applicable in case of the projects achieving ZLD)
- ii. As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises (applicable in case of the projects achieving the ZLD).
- iii. The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the State Pollution Control Board while granting Consent under the Air/Water Act, whichever is more stringent.
- iv. Total fresh water requirement shall not exceed the proposed quantity or as specified by the Committee. Prior permission shall be obtained from the concerned regulatory authority/CGWA in this regard.
- v. Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
- vi. The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.
- vii. The DG sets shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.

IV. Noise monitoring and prevention

- i. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- ii. The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation.
- iii. The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.

V. Energy Conservation measures

- i. The energy sources for lighting purposes shall preferably be LED based.

VI. Waste management

- i. Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.
- ii. Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.

iii. The company shall undertake waste minimization measures as below:-

- 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 material substitutes in other processes.
- c. Use of automated filling to minimize spillage.
- d. Use of Close Feed system into batch reactors.
- e. Venting equipment through vapour recovery system.
- f. Use of high pressure hoses for equipment clearing to reduce wastewater generation

VII. Green Belt

The green belt of 5-10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.

VIII. Safety, Public hearing and Human health issues

- i. Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- ii. The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- iii. The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
- iv. Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
- v. Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.
- vi. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- vii. There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.

IX. Corporate Environment Responsibility

- i. The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No. 22-65/2017-IA.III dated 1st May 2018, as applicable, regarding Corporate Environment Responsibility.
- ii. The company shall have a well laid down environmental policy duly approve by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental / forest /wildlife norms/ conditions. The company shall have defined system of reporting infringements / deviation / violation of the environmental / forest / wildlife norms / conditions and / orshareholders / stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.
- iii. A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly to the head of the organization.
- iv. Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.
- v. Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

X. Miscellaneous

- i. The project proponent shall make public the environmental clearance granted for their project along with the environmental conditions and safeguards at their cost by prominently advertising it at least in two local newspapers of the District or State, of which one shall be in the vernacular language within seven days and in addition this shall also be displayed in the project proponent's website permanently.
- ii. The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt.
- iii. The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and update the same on half-yearly basis.
- iv. The project proponent shall monitor the criteria pollutants level namely; PM₁₀, SO₂, NO_x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects and display the same at a convenient location for disclosure to the public and put on the website of the company.

- v. The project proponent shall submit six-monthly reports on the status of the compliance of the stipulated environmental conditions on the website of the ministry of Environment, Forest and Climate Change at environment clearance portal.
- vi. The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.
- vii. The project proponent 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, commencing the land development work and start of production operation by the project.
- viii. The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.
- ix. The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.
- x. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).
- xi. Concealing factual data or submission of false/fabricated data may result in revocation of this environmental clearance and attract action under the provisions of Environment (Protection) Act, 1986.
- xii. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.
- xiii. The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.
- xiv. The Regional Office of this Ministry shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data / information/monitoring reports.
- xv. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.
- xvi. Any appeal against this EC 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.

Agenda No.2 : F1 (4)/SEIAA/SEAC-Raj/Sectt/Project / Cat. 5(f) B2 (15361)/ 19-20

Name of Project: Amendment In Environmental Clearance ("B" under category 5(f) Of EIA Notification dated 14.09.2006 and its subsequent amendments) (Amendment in EC under clause 7(ii) of the EIA Notification 2006) at SP-2-5, RIICO Industrial Area, Phase L, Village-Neemrana, Tehsil— Neemrana, Formally Under Behror Tehsil), District— Alwar Rajasthan-301705 PROJECT Area:- 76,970Sq m. (No additional land is acquired) Existing Capacity: 200 Kg/Day, Proposed Capacity: 535 Kg/Day; Total-735 Kg/Day Study Period:- October—November- December'2017

Proponent Name:- Alchem International Pvt. Ltd., Authorized Signatory:- Sunil Malik (Vice President- Supply Chain Managements) SP 2- 5, RIICO Industrial Area, Phase I, Neemrana, District- Alwar, Email:—sunil.malik@alcheminternational.com, nksingh@alcheminternational.com 91- 1494- 246996; Fax No.:- 91- 1494- 246995

Consultant Name: ENKAY ENVIRO SERVICES PVT. LTD., Add-92 Heera Nagar - A, Near Shalimar Bagh, Ajmer Road, Distt.- Jaipur (Raj.) Email:- info@enkayenviro.com

The particulars of the project, in brief, as submitted by the PP are as follows:

1.	Category / Item no.(in Schedule):	5(f) B2
2.	Location of Project	# SP 2-5, Riico Industrial Area , Phase -1, Village -Neemrana ,Tehsil – Neemrana , District – Alwar, Rajasthan-301705.
3.	Project Details /Production capacity	Capacity-735 Kg/Day (As per EC granted, Report page No. 33)
4.	Project Cost:	Project Cost: -Existing- Rs.101.11 Crore ; Proposed - Rs. 0.2395 Crore; Total -101.3495 Crore (Form-1 Page No. 9)
5.	Water Requirement & Source	One time fresh water: - 297 KLD; Daily Fresh water: - 200 KLD and Recycled Water: - 97 KLD water will be recycled after treatment with ETP. Source:- Borewell (Existing – 2 Nos.) and RIICO (As per EC granted, Report page No. 35)
6.	Fuel & Energy:-	Power Requirement (MW):- Total – 2000 kVA, Fuel Requirement:- 1. Diesel:- Existing -320 (Lt/ Hr); Proposed – 250 (Lt/ Hr); Total - 570 (Lt/ Hr). 2. Natural Gas:- Existing- 0 (Kg/Hour); Proposed – 222 (Kg/Hour).

7.	Application No. & Date & documents submitted :-	Application No:-Nil Documents submitted:- 18.03.2020
8.	Date of Air/Water/Noise Monitoring	October, November & December'2018
9.	Information about 500 mts composite map	Not Applicable, It is an industrial project.
10.	Environment Management Plan	Annual expenditure of in 711.75 lacs per year (As per EC granted, Report page No. 36)
11.	CSR /ESR Activates	Annual expenditure of in 38.25 lacs per year. 5 Year CER Budget 2018-2022 (As per EC granted, Report page No. 37)
12.	Green Belt/ Plantation	Annual expenditure of 10.0 lacs per year (As per EC granted, Report page No. 40)
13.	Budgetary Breakup for Labour	Annual expenditure of in 4.0lacs per year (As per EC granted, Report page No. 40)
14.	Present Status :-	Brownfield Project

Observations of the Committee:

The SEAC decided to consider the proposal submitted by the PP as B2 category project, through video conferencing, in pursuance to the Notification dated 27.03.2020 and OM dated 13.04.2020 of the MoEF & CC in its 4.38th (A) meeting held on 22.04.2020.

The PP has submitted application for amendment of the existing environment clearance granted by SEIAA, vide letter dated 24.07.2019, for producing 735 Kg per day of herbal extract Active Pharmaceutical Ingredient in its plant located at SP-2-5 RIICO Industrial Area Phase-I, Neemrana Nagar, Tehsil Neemrana, District Alwar, Rajasthan, having total plot area of 76,970.00 sq.mt; for installation of, additional one, 4- TPH Gas Fired/ HSD Fired Boiler in the existing plant premises.

It is stated that the proposal does not involve any increase in the production capacity but the proposal is only for installation of, additional one, 4- TPH Gas Fired/ HSD Fired Boiler. The proposal is aimed at curbing impact of Air Pollution, caused due to Adiabatic Lapse Rate, in the post monsoon season. In post monsoon (Oct-Dec) season the particulate matter remains suspended in the atmosphere and results into creation of smog. The PP, according to the proposal, will continue to utilize the existing 8- TPH Agro Husk Boiler during the rest of the period. According to the proposal use of Gas/ HSD Fired Boiler will reduce water consumption in the boiler from 50 KLD to 30 KLD. The proposal does not require additional land as the

installation of new boiler will be done in the existing plant area of 14,527 Sq. mt out of 76,970 Sq.mt. The proposal does not involve any increase in consumption of energy, DG sets requirement, Fuel requirement, Husk and Exhausted Herbs requirement and Water requirement. It is stated that the project does not attract general or specific conditions and needs no approval under the Forest (Conservation), Act and the Wildlife (Protection), Act. It is stated that the proposal will not cause physical changes in the area (topography, land use, changes in water bodies etc.) and that there will be no additional requirement of natural resources other than those mentioned in the proposal for installation of Gas Fired Boiler. The PP has submitted copy of Consent to Operate (CTO) granted by the RSPCB under the provisions of the Water Act and the Air Act, from time to time for production of 200 Kg per day of Herbal extracts and their purified products. The said consent is valid upto 30.04.2023. Similarly copy of authorization granted by the RSPCB under the Hazardous and Other Waste Rules, 2016 has also been submitted. The authorization is valid upto 30.09.2022. The affidavit dated 18.10.2019, each, of the PP and the consultant states that no activity / construction / expansion has been undertaken in violation of the Notification dated 14.03.2017 and 08.03.2018 of the MoEF & CC. The PP has submitted self certified report of compliance of conditions of earlier EC and statement of production carried out during 2012-13 to 2019-20. The compliance report and production figure do not have certification by the RSPCB/ MoEF & CC and the Central Excise Department, respectively. The SEIAA, however, considered it expedient to rely on the self certified (certified by the PP) production figures and compliance report of EC conditions having regard to the Notification dated 27.03.2020 and 13.04.2020 of the MoEF & CC, aimed at ensuring drug availability or production to reduce the impact of Novel Corona Virus (COVID-19).

The SEAC was, however, of the view that SEIAA may ask the RSPCB to inquire into the issue of compliance of the conditions of EC and on the basis of findings of such inquiry take appropriate action in the matter, in accordance with law.

Resolution:

The SEAC considered the application for amendment of EC and the documents submitted therewith, clarification about the project, made during presentation by the PP and his consultant and due appraisal of the project, resolved to recommend to SEIAA for amendment of the existing EC to Alchem International Pvt. Ltd., Authorized Signatory:- Sunil Malik (Vice President-Supply Chain Managements) SP-2-5, RIICO Industrial Area, Phase I, Neemrana, District- Alwar, Rajasthan, granted by SEIAA, vide letter dated 24.07.2019, for producing 735 Kg per day of herbal extract, Active Pharmaceutical Ingredient in its plant located at SP-2-5 RIICO Industrial Area Phase-I, Neemrana Nagar, Tehsil Neemrana, District Alwar, Rajasthan, having total plot area of 76,970.00 sq.mt; for installation of additional one 4- TPH Gas Fired/ HSD Fired Boiler in the existing plant premises, subject to the conditions of EC dated 24.07.2019 besides the following conditions:

I. Statutory compliance

- i. The project proponent shall obtain forest clearance under the provisions of Forest (Conservation) Act, 1986, in case of the diversion of forest land for non-forest purpose involved in the project.
- ii. The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.
- iii. The project proponent shall prepare a Site-Specific Conservation Plan & Wildlife Management Plan and approved by the Chief Wildlife Warden. The recommendations of the approved Site-Specific Conservation Plan / Wildlife Management Plan shall be implemented in consultation with the State Forest Department. The implementation report shall be furnished along with the six-monthly compliance report. (in case of the presence of schedule-I species in the study area)
- iv. The project proponent shall obtain Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State pollution Control Board/Committee.
- v. The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.
- vi. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.

II. Air quality monitoring and preservation

- i. The project proponent shall install 24x7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognised under Environment (Protection) Act, 1986 or NABL accredited laboratories.
- ii. The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognised under Environment (Protection) Act, 1986.
- iii. The project proponent shall install system to carryout Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released (e.g. PM10 and PM25 in reference to PM emission, and SO2 and NOx in reference to SO2 and NOx emissions) within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120 each), covering upwind and downwind directions.
- iv. To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.

- v. Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- vi. National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.
- vii. 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

III. Water quality monitoring and preservation

- i. The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises (applicable in case of the projects achieving ZLD)
- ii. As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises (applicable in case of the projects achieving the ZLD).
- iii. The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the State Pollution Control Board while granting Consent under the Air/Water Act, whichever is more stringent.
- iv. Total fresh water requirement shall not exceed the proposed quantity or as specified by the Committee. Prior permission shall be obtained from the concerned regulatory authority/CGWA in this regard.
- v. Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
- vi. The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.
- vii. The DG sets shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.

IV. Noise monitoring and prevention

- i. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- ii. The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation.

- iii. The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.

V. Energy Conservation measures

- i. The energy sources for lighting purposes shall preferably be LED based.

VI. Waste management

- i. Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.
- ii. Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.
- iii. The company shall undertake waste minimization measures as below:-
 - 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 material substitutes in other processes.
 - c. Use of automated filling to minimize spillage.
 - d. Use of Close Feed system into batch reactors.
 - e. Venting equipment through vapour recovery system.
 - f. Use of high pressure hoses for equipment clearing to reduce wastewater generation

VII. Green Belt

The green belt of 5-10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.

VIII. Safety, Public hearing and Human health issues

- i. Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- ii. The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- iii. The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
- iv. Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall

be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.

v. Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.

vi. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.

vii. There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.

IX. Corporate Environment Responsibility

i. The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No. 22-65/2017-IA.III dated 1st May 2018, as applicable, regarding Corporate Environment Responsibility.

ii. The company shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental / forest /wildlife norms/ conditions. The company shall have defined system of reporting infringements / deviation / violation of the environmental / forest / wildlife norms / conditions and / or shareholders / stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF & CC as a part of six-monthly report.

iii. A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly to the head of the organization.

iv. Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.

v. Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

X. Miscellaneous

i. The project proponent shall make public the environmental clearance granted for their project along with the environmental conditions and safeguards at their cost by prominently advertising it at least in two local newspapers of the District or State, of which one shall be in the vernacular

language within seven days and in addition this shall also be displayed in the project proponent's website permanently.

ii. The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt.

iii. The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and update the same on half-yearly basis.

iv. The project proponent shall monitor the criteria pollutants level namely; PM₁₀, SO₂, NO_x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects and display the same at a convenient location for disclosure to the public and put on the website of the company.

v. The project proponent shall submit six-monthly reports on the status of the compliance of the stipulated environmental conditions on the website of the ministry of Environment, Forest and Climate Change at environment clearance portal.

vi. The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.

vii. The project proponent 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, commencing the land development work and start of production operation by the project.

viii. The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.

ix. The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.

x. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).

xi. Concealing factual data or submission of false/fabricated data may result in revocation of this environmental clearance and attract action under the provisions of Environment (Protection) Act, 1986.

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

xiii. The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.

xiv. The Regional Office of this Ministry shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data / information/monitoring reports.

xv. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.

xvi. Any appeal against this EC 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.

Additional Agenda:

S.NO.	SEAC. NO.	Project Name	Proponent Name
1.		Consideration of projects other than API by SEAC through Video Conferencing (VC) during lockdown:	

Additional Agenda 1 :**Consideration of projects other than API by SEAC through Video Conferencing (VC) during lockdown:**

The SEAC in its 4.38th (A) VC meeting held on 22.04.2020, looked into the issue as to whether it can consider and appraise proposals for project and activities other than those relating to Active Pharmaceutical Ingredient (API), through Video Conferencing, during lockdown period.

The SEAC, in regard to above went through Notification dated 27.03.2020 and OM dated 13.04.2020.

The OM dated 13.04.2020 provide that SEAC and SEIAA shall conduct their meetings through use of information technology platforms example Video Conferencing, with respect to API falling under item 5 (f) of the EIA Notification.

The SEAC in compliance of the said Notification dated 27.03.2020 and OM dated 13.04.2020 is appraising the proposals for project and activities relating to API as B2 category project, through video conferencing and making recommendation to SEIAA, accordingly.

The said OM does not give authority to SEAC/SEIAA to conduct meeting through video conferencing with respect to the projects other than those relating to API.

In case it is intended that SEAC should conduct meetings through video conferencing for appraisal of other projects mentioned in the Schedule of the EIA Notification, besides those falling under serial no.5 (f) (API) of the Schedule, there has to be specific order/direction from the MoEF & CC similar to that of OM dated 13.04.2020 of the MoEF & CC.

The SEAC in view of above resolved to recommend to SEIAA to seek necessary orders/directions/guidelines in regard to above from MoEF & CC, so that the project other than those falling under 5(f) category could be appraised by SEAC through video conferencing.