

HEALTHGENIC CHEMICALS PVT. LTD.

REGISTER OFFICE : BOMBAY MARKET, SHOP NO. 8, SECOND FLOOR, SANALA ROAD, MORBI-363641 (GUJ.)

Ref. No. :

Date :

Date: 10/08/2018

To,

Director and Member Secretary,
Ministry of Environment, Forest & Climate Change,
3rd Floor, Vayu Wing, Indira Paryavaran Bhavan,
Jor Bagh Road, Ali Ganj,
New Delhi- 110 003.

Subject: Submission of Additional Details for obtaining Environmental Clearance for proposed project for **Active Pharmaceutical Ingredients** at Survey No.: 112 paiki 2 & 113 paiki 1 & paiki 2, Village: Chachapar, Taluka & District: Morbi, Gujarat by **M/s. Healthgenic Chemicals Pvt. Ltd.**

Reference: i) EC Application (Proposal No.: IA/GJ/IND2/65521/2017) dated 25th May, 2018.

ii) Additional information raised vide Minutes of 39th Expert Appraisal Committee (Industry-2) meeting held during 25th to 27th July, 2018.

Respected Sir,

This has reference to above stated subject matter. In this connection you are requested to note that we have presented our case on 26th July, 2018 (Agenda No. 39.3.12) for which minutes of the above stated meeting has been uploaded on MoEF&CC website attached as **Annexure-A**. In the stated minutes it is mentioned that we have to submit the following details.

Sr. No.	EAC Query	Our Response
1	Desired for concurrence of the State Pollution Control Board to allow APIs manufacturing at proposed project location.	We have been granted NOC from Gujarat Pollution Control Board (GPCB) for manufacturing proposed Active Pharmaceutical Ingredients (APIs) wide NOC No. GPCB/CCA-MOR-1579/ID-55608 dated 09 th August, 2018. The same is attached as Annexure – B for your perusal.

We do hope that the above meets with your requirements and we request you to do the needful to issue Environmental Clearance for our project.

Thanking You,

Yours faithfully,

For, M/s Healthgenic Chemicals Pvt. Ltd.

Rakesh Becharbhai Savaria [Director]

HEALTHGENIC CHEMICALS PVT. LTD.


DIRECTOR

Annexure - A

Minutes of the 39th Expert Appraisal Committee (Industry-2) Meeting held during 25-27 July, 2018 at Indira Paryavaran Bhawan, Jor Bagh Road, Ministry of Environment, Forest and Climate Change, New Delhi - 3

Day one - 25th July, 2018

39.1 Opening Remarks by the Chairman

39.2 Confirmation of minutes of the 38th meeting of the EAC (Industry-2) held on 25-27 June, 2018 at Indira Paryavaran Bhawan, New Delhi.

The EAC, having taken note that no comments were offered on minutes of its 38th meeting held on 25-27 June, 2018 at New Delhi, confirmed the same.

39.3 Environmental Clearance

Agenda No.39.3.1

Expansion of molasses based distillery from 35 KLPD to 65 KLPD by M/s Brima Sagar Maharashtra Distilleries Ltd at Shreepur, Taluka Malshiras, District Solapur (Maharashtra)

[IA/MH/IND2/67191/2017, J-11011/192/2017-IA-II (I)]

39.3.1.1 The project proponent and the accredited Consultant M/s Dr. Subbarao's Environment Center made a detailed presentation on the salient features of the project and informed that:

(i) The proposal is for environmental clearance to the project Expansion of existing molasses based distillery from 35 KLPD to 65 KLPD by M/s Brima Sagar Maharashtra Distilleries Ltd at Shreepur, Taluk Malshiras, District Solapur (Maharashtra).

(ii) The project proposal was considered by the Expert Appraisal Committee (Industry-2) in its 13th meeting held during 19th November, 2013 and recommended Terms of References (ToR) for the Project. The ToR has been issued by Ministry vide letter No.J-11011/249/2013-IA.II(I) dated 31st January, 2014.

(iii) The project proponent applied for amendments in ToRs which were approved, vide F.No.J-11011/249/2013-IA.II(I) dated 8th May, 2015.

(iv) The project proponent submitted the EIA report for Environmental Clearance which was considered by the Expert Appraisal Committee (Industry-2) in its 24th meeting held during 14th to 16th June, 2017. The EAC did not approve the EIA Report as it was not submitted within the stipulated period of 3 years after the grant of the ToRs. The Committee recommended the Standard ToRs for preparation of EIA Report, and the additional ToRs were given as:

- Fresh baseline Data to be Submitted
- Public Hearing is exempted under the provision as per Para 7(ii) of the EIA Notification 2006

(v) All molasses based distillery projects are listed at S.N. 5(g) of Schedule of Environment Impact Assessment (EIA) Notification under category 'A' and are appraised at Central Level by Expert Appraisal Committee (EAC).

- 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.
- 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.
- Fly ash should be stored separately as per CPCB guidelines so that it should not adversely affect the air quality, becoming air borne by wind or water regime during rainy season by flowing along with the storm water. Direct exposure of workers to fly ash & dust should be avoided.
- 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.
- The green belt of at least 5-10 m width shall be developed in nearly 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.
- At least 1% of the total project cost shall be allocated for Corporate Environment Responsibility (CER) and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office.
- For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- 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.
- Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For 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.

Agenda No. 39.3.12

Manufacturing of Active Pharmaceutical Ingredients of capacity 125 TPM at Survey No. 112 Paiki 2&113, Paiki 1& 2, village chachapar, Taluka & District Morbi (Gujarat) by M/s Healthgenic Chemicals Pvt Ltd

[IA/GJ/IND2/65521/2017, J-11011/328/2017-IA-II(I)]

39.3.12.1 The project proponent and the accredited consultant M/s T R Associates, made a detailed presentation on the salient features of the project and informed that:

- (i) The proposal is for environment clearance to the project for proposed Active Pharmaceutical Ingredients manufacturing unit at Survey No.112 Paiki 2 & 113, Paiki 1 & Paiki 2, Village Chachapar, Taluka and District Morbi (Gujarat) by M/s Healthgenic Chemicals Pvt. Ltd.
- (ii) The project proposal was considered by the Expert Appraisal Committee (Industry-2) in its 39th meeting held during 25th to 27th July 2018 and recommended Terms of References (TORs) for the project. The TOR has been issued by Ministry vide letter no. J-11011/328/2017-IA.II (I) dated 10/11/2017.
- (iii) All Synthetic Organic Chemicals Industry projects, located outside the notified industrial area/estate and not fall into small scale unit criteria are listed at S.N.5(f) of schedule to the Environmental Impact Assessment (EIA) Notification, 2006 under Category 'A' and are appraised at Central level by the Expert Appraisal Committee (EAC).
- (iv) Total land area will be 13,304 sqm. Green belt will be developed in an area of 34.5% i.e. 4,590 sqm out of 13,304 sqm area of the project.
- (v) The estimated project cost is approx. Rs.4 Crores. Total capital cost earmarked towards environmental pollution control measures is Rs.70 Lakhs and the recurring cost (operation and maintenance) will be about Rs.37. Lakhs per annum. Total employment will be 40 persons as a direct.
- (vii) There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wild Life Corridors etc within 10 km distance from the project site. Phulki River is flowing at a distance of 4.7 km in ENE direction. Demi River is flowing at a distance of 3.6 km in WSW direction and DEMI II-Irrigation Project is situated at a distance of 5.30 km in SSE direction.
- (viii) Ambient air quality monitoring was carried out at 8 locations during October, 2017 to December, 2017 and submitted baseline data indicates that ranges of concentrations of PM₁₀ (57.10 to 86.20 µg/m³), PM_{2.5} (21.15 to 36.63 µg/m³), SO₂ (9.79 to 24.97 µg/m³), NO₂ (20.01 to 35.87 µg/m³) respectively. AAQ modelling study for point source emissions indicates that the maximum incremental GLCs after the proposed project would be 0.40 µg/m³, 0.055 µg/m³, 0.40 µg/m³, 1.00 µg/m³, 3.00 µg/m³ with respect to PM₁₀, SO₂, NO₂, NH₃, HCl. The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).
- (ix) Total estimated water requirement is 79 cum/day of which fresh water requirement of 32 m³/day will be met from Borewell.
- (x) Industrial effluent of 53.8 m³/day will be treated through Effluent Treatment Plant followed by MEE and the stated system will achieve Zero Liquid Discharge. Domestic effluent of 3.8 m³/day will be disposed off through Septic tank/ Soak pit system.
- (xi) Power requirement of proposed project will be 375 KVA proposed to be met from Paschim Gujarat Vij Company Limited (PGVCL). DG set of 125 kVA capacity will be installed and will be used as standby during power failure. Stack height of 6 m will be provided as per CPCB norms.

(xii) Briquettes/Coal fired boiler of 1 TPH capacity will be installed. Cyclone Separator followed by Bag Filter with a stack height of 30 m will be provided to control the particulate emissions within statutory norms.

(xiii) Details of process emissions generation and its management is as under:-

S. No.	Stack attached to	Stack Height (m)	Expected Pollutant	APC System
1	Reactor -1	12	HCl Gas	Caustic scrubber followed by stack
2	Reactor -2	12	Ammonia	HCl scrubber followed by stack
3	Reaction vessels	12	VOC	Two stage Condenser followed by activated carbon and scrubber.

(xiv) Details of solid waste/hazardous waste generation and its management is as under:-

S. No.	Description	Category	Quantity (MTPM)	Mode of Disposal
1	ETP Sludge + Evaporation residue	35.3	390	Collection, storage and disposal at approved TSDF Site.
2	Distillation residue	20.3	175	Collection, storage and disposal at approved CHWIF for disposal.
3	Process residue	28.1	180	Collection, storage and disposal at approved CHWIF for disposal
4	Spent Carbon	28.3	26	Collection, storage and disposal at approved CHWIF for disposal
5	Spent catalyst	28.2	3	
6	Used / Spent Oil	5.1	0.5	Collection, storage and used within premises as a lubricant / sold to registered recycler.
7	Discarded bags/ drums/ containers	33.1	30	Collection, storage & sell to authorized vendor
8	Off specification product/drugs	28.4 & 28.5	App. 5	Collection, storage and disposal at approved CHWIF for disposal.

(xv) Public hearing for the proposed project has been conducted by the State Pollution Control Board on 2nd May, 2018. The main issues raised during the Public hearing are related local employment and social upliftment activities in surrounding area.

(xvi) The details of proposed products is as under:-

S. No.	Name of Product	Capacity (MTPM)
1	Povidon Iodine	30
2	Bronopol	4
3	Diclofenac Sodium	4
4	Diclofenac Potassium	4
5	Sodium Citrate	15
6	Carvedilol	4
7	Metformin Hydrochloride	4
8	Pentoxifylline	10
9	Pregabalin	4
10	Pentoprazole Sodium	4
11	Glimepiride	4
12	Topiramate	4
13	Gabapentin	4
14	Atorvastatin Calcium	30

39.3.12.2 During deliberations, the EAC noted the following: -

The proposal is for environmental clearance to the project for setting up of Active Pharmaceutical Ingredients manufacturing unit of capacity 125 TPM by M/s Healthgenic Chemicals Pvt. Ltd in a total area of 13,304 sqm at Survey No.112 Paiki 2 & 113, Paiki 1 & Paiki 2, Village Chachapar, Taluka and District Morbi (Gujarat).

The project/activities are covered under category A of item 5(f) 'Synthetic organic chemicals industry' of the Schedule to the Environment Impact Assessment Notification, 2006, and requires appraisal at central level by the sectoral EAC in the Ministry.

The ToR for the project was granted on 10th November, 2017. Public hearing was conducted by the SPCB on 2nd May, 2018.

Total water requirement is estimated to be 79 cum/day of which fresh water requirement of 32m³/day will be met from Borewell.

Total effluent generated from different industrial operations is estimated to be 53.8m³/day. Generated effluent will be treated through Effluent Treatment Plant followed by MEE. Domestic effluent of 3.8 m³/day will be disposed off through Septic tank/ Soak pit system. There will be no discharge of treated/untreated waste water from the unit, and thus conforming to Zero Liquid Discharge.

39.3.10.3 The EAC, after deliberations and especially in view of the unit proposed in non-industrial area, desired for concurrence of the State Pollution Control Board to allow APIs manufacturing therein.

The proposal was, therefore, not taken forward for the needful.

Agenda 39.3.13

Expansion of Soda Ash and Captive Cogeneration Power Plant at village Mithapur & Surajkaradi, Taluka Dwarka, District Devbhumi (Gujarat) by M/s TATA Chemicals Ltd.

[IA/GJ/IND2/53444/201, J-11011/140/2016-IA II (I)]

39.3.13.1 The Project Proponent and the accredited Consultant M/s. J.M. Enviro Net Pvt Ltd made a detailed presentation on the salient features of the project and informed that:

(i) The proposal is for environmental clearance to the project for proposed expansion of Soda Ash & Captive Cogeneration Power Plant at Villages Mithapur & Surajkaradi, Taluka Dwarka, District: Devbhumi Dwarka, Gujarat by M/s. Tata Chemicals Ltd.

(ii) The project proposal was considered by the Expert Appraisal Committee (Industry-2) in its 9th meeting held during 27th-28th June, 2016 and recommended Terms of References (ToRs) for the project. The ToR has been issued by Ministry vide Letter No. J-11011/140/2016-IA.II.(I) dated 2nd August, 2016.

(iii) All activities are listed at S.No. 4(e) {Soda Ash Industry} and 1(d) {Thermal Power Plant} of Schedule of Environment Impact Assessment (EIA) Notification under category 'A' and are appraised at Central Level by Expert Appraisal Committee (EAC).

(iv) Ministry had issued EC earlier vide letter no. J-13011/20/2006.IA-II(T) dated 22nd May, 2006; amended on 30th May, 2007 for expansion of Captive Co-generation Power Plant in favour of M/. Tata Chemicals Ltd.

(v) Existing land area is 231 Ha (2310000 m²). No additional land will be required for proposed expansion.

(vi) Greenbelt will be developed in an area of 33 % i.e., 131 Ha (1310000 m²) out of total area of the project.

(vii) The estimated project cost is Rs.1042.07 crores including existing investment of Rs.2977.30 crores. Total capital cost earmarked towards environmental pollution control measures is Rs.80.79 crores and the Recurring cost (operation & maintenance) will be about Rs.16.29 crores per annum. Total Employment generation will be 4551 persons as direct & 10,262 persons indirect after expansion.

- For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- 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.
- Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- 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.
- Storage of raw materials shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For 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.
- CO₂ generated from the process shall be bottled/made solid ice/value added products and sold to authorized vendors.

S. No.	Name and Address	Designation
1	Dr. J. P. Gupta	Chairman
2	Dr. Ahmed Kamal	Member
3	Prof. J.R. Mudakavi	Member
4	Dr. N. Nandini	Member
5	Ms. Saloni Goel	Member
6	Shri Suhas Ramchandra Pharande	Member
7	Shri Sanjay Bist	Member
8	Sh. Paritosh Kumar	Member
9	Prof. (Dr.) Y.V. Rami Reddy	Member
10	Shri S.K. Srivastava	Member Secretary

Annexure-B



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : www.gpcb.gov.in

BY RPAD

AMENDMENT OF CONSENT TO ESTABLISH (NOC)

NO.GPCB/CCA-MOR-1579/ID-55608/

Date:

To,

M/s. Healthgenic Chemicals Pvt Ltd.,

Plot No. Sr No. 112/113 Paiki- 1,

Sr No. 112/113 Paiki-1, Village- Chachapar- 363642,

Ta- Dist-Morbi,

Sub :- Amendment in Consent to Establish (NOC).

Ref: (1) Your Amendment in Consent to Establish (NOC) application inward 133613 Dated. 17/02/2018.

(2) The Board has granted Consent to Establish (NOC) Order CTE-88147 with valid up to 03/07/2024 issued vide our letter No. GPCB/CCA/MOR-1579/ID-55608/429557 Dated.01/12/2017.

Sir,

The Board has granted Consent to Establish (NOC) Order CTE-88147 with valid up to 03/07/2024 issued vide our letter No. GPCB/CCA/MOR-1579/ID-55608/429557 Dated.01/12/2017 Now CTE-Amendment granted as under.

CTE-Amendment No: CTE-93209, Valid up to: 22/05/2023

The product Mentioned in above referred order issued by the board shall be read as.

Sr. No.	Product	Existing Quantity	Proposed Quantity	Total Quantity
1	Tablets	8,50,00,000 Nos. Tablets/month	-	8,50,00,000 Nos. Tablets/month
2	Capsule	85,00,000 Nos. Capsule/month	-	85,00,000 Nos. Capsule/month
3	Oral Powder	50,00,000 Nos. ORS pouch/month	-	50,00,000 Nos. ORS pouch/month
4	Povidon Iodine	-	30 MT/Month	30 MT/Month
5	Bronopol	-	4 MT/Month	4 MT/Month
6	Diclophenic Sodium	-	4 MT/Month	4 MT/Month
7	Diclophenic Potassium	-	4 MT/Month	4 MT/Month
8	Sodium Citrate	-	15 MT/Month	15 MT/Month
9	Carvidilol	-	4 MT/Month	4 MT/Month
10	Metformine Hydrochloride	-	4 MT/Month	4 MT/Month
11	Pentoxifylline	-	10 MT/Month	10 MT/Month
12	Pregabalin	-	4 MT/Month	4 MT/Month
13	Pentaprazole Sodium	-	4 MT/Month	4 MT/Month
14	Glimipidil	-	4 MT/Month	4 MT/Month
15	Topiramate	-	4 MT/Month	4 MT/Month
16	Gabapentine	-	4 MT/Month	4 MT/Month
17	Atorvastatin Calcium	-	30 MT/Month	30 MT/Month

Clean Gujarat Green Gujarat

ISO-9001-2008 & ISO-14001 - 2004 Certified Organisation

1. Specific condition:
 - 1.1 Unit shall observe Zero Liquid Discharge.
 - 1.2 Unit shall start production activity only after obtain Environment Clearance (EC).
 - 1.3 Unit shall obtain permission form CGWA for withdrawal of underground water.

2 CONDITIONS UNDER THE WATER ACT 1974

Condition no. 4 is amended as below.

- 2.1 The quantity of the fresh water consumption for industrial purpose shall not exceed 75 KLPD.
- 2.2 The quantity of the fresh water consumption for domestic purpose shall not exceed 22 KLPD.
- 2.3 The quantity of the industrial effluent from the mfg. process shall not exceed 31.05 KLPD & generated waste water after treatment shall be completely evaporate in MEE.
- 2.4 The quantity of Sewage effluent from the factory shall not exceed 4 KLPD.
- 2.5 Domestic effluent shall be disposed of through Septic tank/ soak.

3. Condition under Air Act- 1981 is amended as below.

The condition no. 3.1 & 3.2 of Air Act shall be amendment as under.

- 3.1. The following shall be used as fuel.

Sr. No	Fuel	Existing Qty	Proposed Qty	After Expansion Total Qty
1.	Coal or Briquettes	-	1 MT/day	1 MT/day
2.	HSD	530 Lit/ day	--	530 Lit/ day

- 3.2. The flue gas emission through stack attached to Boiler, shall conform to the following standards:

Stack No.	Flue gas stack attached to	Stack height In meter	APCM	Parameter	Permissible Limit
1	Boiler (1 TPH)	30	Cyclone separator followed by Bag filter	Particulate matter SO ₂ NO _x	150 mg/NM ³ 100 ppm 50 ppm
2	D. G. Set (125 KVA)	06	-		

- 3.3 The Process emission through various stacks/ vent shall conform to the following standards:

Stack No.	Stack attached to	Stack height in Meter	APCM	Parameter	Permissible Limit mg/NM ³
1	Reactor – 1	12	Alkaline Scrubber	HCL	20
2	Reactor – 2	12	Dilute Acidic scrubber	NH ₃	175
3	Dryer vent	6	Activated charcoal System	-	-

Outward No: 465249 09/08/2018



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

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The other conditions of granted Consent to Establish (NOC) Order CTE-88147 with valid up to 03/07/2024 issued vide our letter No. GPCB/CCA/MOR-1579/ID-55608/429557 Dated.01/12/2017 shall remain unchanged.

For and on behalf of
Gujarat Pollution Control Board

D.M. Thaker
9/8/18

(D. M. Thaker)
Environmental Engineer

Outward No: 465249, 09/08/2018

Clean Gujarat Green Gujarat

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Outward No:465249, 09/08/2018