

Query: 04.02.2020



| Sno. | Proposal No. | Essential Details | Sought on/Reply Date | Eds Letter | Status |
|------|-----------------------|--|----------------------|------------|---------|
| 1 | IA/GJ/IND2/75368/2018 | (i) Public hearing proceedings to be forwarded by the Member Secretary, SPCB along with complete public hearing/consultation documents. Also issues raised during public hearing, response by the project proponent, action plan with budgetary allocation has not been submitted. Kindly upload the requisite documents. Form 2 (Sno. 7.1) (ii) Details of Raw material linkage and its mitigation measure during transportation needs to be submitted. (iii) Effluent treatment mechanism with plan for Zero Liquid Discharge needs to be submitted. (iv) Submit action plan as per the Ministry's office memorandum 51st October, 2019 regarding projects located in Critically Polluted Area. (v) Status of water approval (vi) In view of the above, PP/Consultant are requested to revise the application for grant of EC and accordingly revise the Form 2 alongwith EIA/EHP Report. The EIA/EHP Report shall match with the information as filed in Form 2. On examination it is observed that the Consultant has not adequately submitted the application as per the provisions of the EIA Notification, 2008. Consultant has to read the documents before uploading the information in Form 2 /EIA/EHP report. | 04/02/2020 | | Pending |

Point wise reply of above query is given below:

1. Public hearing proceedings to be forwarded by the Member Secretary, SPCB along with complete public hearing/consultation documents. Also issues raised during public hearing, response by the project proponent, action plan with budgetary allocation has not been submitted. Kindly upload the requisite documents. Form 2 (S. no. 7.1)

Member Secretary, GPCB has forwarded PH proceedings along with supporting documents to Director (Industry-II), MoEFCC by Speed post. We have procured copy of same and uploaded the same at Sr. No. 7.1 of Form-2 and also attached herewith.

Issues raised during the public hearing has already addressed along with budgetary provision & time bound action plan in Table 7.11, page no. 7-42, Chapter-7 of EIA report.

2. Details of Raw material linkage and its mitigation measure during transportation needs to be submitted.

Quantity of Raw materials is very less i.e. average 1 truck/tanker per day will be transported. All the raw materials are locally available. We will transport all the raw materials either in close tanker or in covered truck to mitigate any adverse impact.

3. Effluent treatment mechanism with plan for Zero Liquid Discharge needs to be submitted.

We have already proposed ZLD. Complete effluent treatment scheme with Zero Liquid Discharge is given in Section 2.9.1, Page no. 2-38, Chapter-2 of EIA Report. ETP flow diagram is given in Figure 2.6, Page no. 2-39, Chapter-2.

4. Submit action plan as per the Ministry's office memorandum 31st October, 2019 regarding projects located in Critically Polluted Area.

Our project location does not fall in Critically Polluted Area (CPA) or Severely Polluted Area (SPA) as per the MoEFCC Office Memorandum dated 31.10.2019. Gujarat Pollution Control Board (GPCB) has issue Office Order for mechanism of environmental management of CPAs/SPAs of Gujarat State including Map of respective areas obtained from BISAG. Copy of same is enclosed herewith for your ready reference.

Nandesari and PCCI Estate are identified CEPI areas nearest from our project location, which are around 21 km & 20 km away from the site. Pls. refer Pg. no. 10 of this pdf file. It is self-explanatory that, our industrial area does not fall in CEPI area or not in close vicinity of boundary of CEPI areas.

5. Status of water approval.

We have applied to CGWA for ground water withdrawal. Application is under process. Copy of same is uploaded at Sr. No. 15 of Form-2.

6. In view of the above, PP/Consultant are requested to revise the application for grant of EC and accordingly revise the Form 2 along with EIA/EMP Reports. The EIA/EMP Reports shall match with the information as filled in Form 2.

We have revised the application and Form-2 as per EIA report.



GUJARAT POLLUTION CONTROL BOARD
Paryavaran Bhavan, Sector 10 A, Gandhinagar 382 010

Phone: 079 - 23232152, 23241514 Fax: 079 - 23222784 Website: www.gpcb.gujarat.gov.in

No. GPCB/PH/2019-20/VRD-86/511285

26 JUN 2019

Time Limit
By RPAD/H.D.

To,
The Director,
I.A. Division,
Ministry of Environment, Forest and Climate 62
Indira Paryavaran Bhavan,
Aliganj, Jorbagh Road,
New Delhi-110003.

EG153266453IN IVR:6971153266453
SP NAVRANGPURA HO <380009>
Counter No:3,03/07/2019,17:0
To:MINISTRY OF ENVIRONMENT.-
PIN:110003, Lodi Road HO
From:GUJARAT POLL.-
Wt:245oms
Est:70.80(Cash)Tax:10.80
<Track on www.indiapost.gov.in>



Sub: To furnish a copy of the Public Hearing proceeding.

Ref: [1] Notification no. S.O 1533 dated September 14, 2006 published by the Ministry of Environment and Forests, Government of India, New Delhi.
[2] MoEF&CC Notification no. S.O.948 dated 12.6.2007 and the Forest and Environment Department, Government of Gujarat's GR no. ENV/10.2006/176/P, dated 25.7.2007
[3] Request Application of from M/s Reynish Pharmachem Pvt. Ltd. to organize Public Hearing.

Sir

Based on request received for public hearing from M/s Reynish Pharmachem Pvt. Ltd. for Synthetic Organic Chemicals – Active Pharmaceutical Ingredients (API) - Total Capacity – 50 MTPM, at Survey No. 504, 505, 506, 507, Village: Dabhasa, Ta. Padra, Dist Vadodara-382705, hearing was organized on 21/06/2019 at 11:00 hrs, Venue: Survey No. 504, 505, 507, Village: Dabhasa, Ta. Padra, Dist. Vadodara (Project Site).

The Public Hearing proceeding along with CD and VCD is enclosed herewith for your information and necessary action please.

For and on behalf of
Gujarat Pollution Control Board,

(G. H. Trivedi)
Senior Environmental Engineer

Encl: As above.(Original copy)

Copy to:

1. District Collector, Collector Office,
District: Vadodara... For information Please
2. The Unit Head, Vadodara Unit
... Along with the original case file of aforesaid applicant for further suitable action.
3. The Regional Officer, GPCB, Vadodara... For further suitable action if any
4. M/s Reynish Pharmachem Pvt. Ltd.
At Survey No. 504, 505, 506, 507, Village: Dabhasa, Ta. Padra, Dist Vadodara-382705... Along with a copy of Public Hearing proceeding for necessary further action Please.
5. File Copy.

**Gujarat Pollution Control Board
Paryavaran Bhavan, Sector-10-A
Gandhinagar**

Office Order

Sub: Mechanism for environmental management of critically and severally Polluted Area and considerations of activities/Projects in such areas in compliance to Hon'ble NGT order dated 23/08/2019 in the matter of O.A. No. 1038/2018-reg.

With reference to CPCB letter no. CPCB/IPC-VII/CEPI/NGT/2019 dated 25/10/2019 mechanism prepared by MoEF&CC for grant Consent to Establishment/Consent to Operate to those projects / activities of Red / Orange categories located in CPAs/ SPAs which are not covered under the provisions of the EIA notification,2006 are delineated.

Accordingly, it is required to prescribe the additional conditions deemed fit in the CTE / CTO of the projects / activities of Red/ Orange categories in the CPAs / SPAs of Gujarat.

After detailed discussion with industries associations of the CPA / SPAs of Gujarat and consultation with other stakeholders, it is decided to prescribe following additional conditions (deemed fit on case to case basis) considering the framework given in the letter of CPCB dated 25/10/2019.

These additional conditions will be applicable to the following CPAs/ SPAs of the Gujarat. Considering the mechanism, the 5 km from the boundary of each CPA/ SPA should be considered as the area of influence and the additional conditions stipulated for the new / expansion project will be made applicable to all such projects in this area. Map of the respective areas obtained from BISAG is enclosed herewith as Annexure-1.

1. Vapi GIDC Estate
2. Sachin & Pandesara GIDC Estate (Considering monitoring carried out by CPCB in these areas)
3. Ankleshwar Cluster (Ankleshwar and Panoli GIDC estate)
4. Nandesari GIDC & PCC Area (Considering monitoring carried out by CPCB in these areas)
5. Vatva- Narol

6. Aji GIDC estate (Rajkot)
7. Chitra GIDC estate (Bhavnagar)

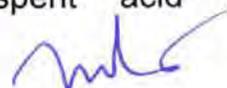
Specific Conditions stipulated in Critically Polluted Areas (CPA) / Severely Polluted Areas (SPA).

Additional conditions under Air Act:

- a) Unit shall adhere to stringent air pollutants standards i.e. 80 % of existing flue gas and process emission standards in the CPA.
- b) Unit shall adhere to stringent air pollutants standards i.e. 90 % of existing flue gas and process emission standards in the SPA.
- c) Following air pollution control measures shall be provided for the flue gas emission sources like Boiler, Thermic Fluid Heaters etc. (As Applicable)

| Stipulated APCM in Red / Orange category industrial units of CPA/ SPA | |
|--|--------------------------------|
| Steam generation capacity (in TPH) | Type of APCM |
| Less than 1 | Multi Cyclone |
| 1 to <3 | Multi Cyclone + Water Scrubber |
| 3 to <6 | Bag filter + Water Scrubber |
| ≥ 6 | ESP+ Water Scrubber |

- d) Unit shall provide at least two stage scrubbing system of appropriate media for the control of the process gas emission.
- e) Unit shall install and commission Continuous Emission Monitoring System- CEMS (as per CPCB guidelines for relevant parameters) which shall be connected with GPCB/CPCB server (In case of large and medium red category industries)
- f) All common facilities shall install CEMS (as per CPCB guidelines for relevant parameters) which shall be connected with GPCB/CPCB server to the Stacks provided with Common Multiple Effect Evaporator (CMEE), Common Spray Dryer, Common incinerator etc.
- g) The unit shall adhere to Sector specific guidelines/ SOP published by GPCB / CPCB from time to time for effective fugitive emission control. (like guidelines for: Stone crushing units, Coal handling units, spent solvent handling and management, spent acid management, Decontamination of drums, containers etc.)



- h) Unit shall take adequate measures to control odour nuisance from the industrial activities which may include measures like- use of masking agent with atomizer system (water curtain), closed / automatic material handling system, containment of the odour vulnerable areas etc.
- i) Unit shall not use Pet-coke, furnace oil, LSHS as a fuel.
- j) Unit shall adopt sectoral Best Available Technology-BAT (Like Use of Induction Furnace, Electric Arc Furnace instead of Cupola furnace in foundry industry, Caustic Recovery System in Cotton Textile units etc.)
- k) Unit shall provide green belt of 40% of the plot area, using concept of the social forestry and development of green belt outside project premises in adjacent areas.
- l) Unit shall provide Wall to Wall carpeting in vehicle movement areas within premises to avoid dusting.

Additional conditions under the Water Act:

1. Unit shall only use treated effluent for preparation of lime and other slurry in ETP. No fresh water shall be utilized in ETP.
2. In the case, if the Industry is not a member of CETP and domestic waste water generation is more than 10 KLPD, industry shall install STP of adequate capacity and treated sewage shall be reused / recycled to the maximum extent.
3. In case of Large and Medium Red Category industry, the unit shall install system for continuous monitoring of effluent quality / quantity as per CPCB guidelines for relevant parameters (like pH, Flow, Temperature, TOC/COD, NH₃-N etc.) and shall be connected to GPCB server. In case, if the industry is a member of CETP, unit shall install flow meter.
4. If the water consumption of the unit is more than 50 KLPD, Unit shall submit detailed water harvesting plan (off site).
5. The unit shall explore Techno-Economic feasibility of Zero Liquid Discharge (ZLD) and if feasible, ZLD should be adopted.



Additional conditions under the Hazardous Waste Management Rules:

1. Unit shall strictly carry out handling, storage and disposal of fly-ash, slag, red-mud, de-inking sludge etc. (High Volume- Low Effect Wastes) as per prevailing guidelines and its disposal at designated locations approved by the Board.
2. Industry shall dispose its hazardous wastes through co-processing, pre-processing to the extent possible prior its disposal to incineration/ landfill as per provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
3. Industry shall strictly comply with all the measures specified in guidelines for spent solvent management, spent acid management, and other guidelines/directions published from time to time by GPCB and/or CPCB, etc.
4. Unit shall carry out transportation of hazardous wastes through GPS mounted vehicles only.

Other General Conditions:

1. Unit shall submit report of compliance of the conditions of EC every year to the Board prepared by third party.
2. Unit shall enhance CER fundallocation to at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental Clearance.

You are required to prescribe relevant additional conditions as above henceforth while granting CTE / CTO of Red / Orange categories located in CPAs/ SPAs.


(N.M. Tabhani)
Member Secretary

No. GPCB/P-1/CEPI-12/ 526552

Date: 11.11.2019

To,

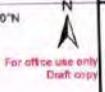
1. All Unit Heads
2. All Regional Officers... **For necessary action please.**

Copy to:

1. Chairman Office
2. Member Secretary Office
3. All Vigilance Officers... for necessary action
4. Respective File
5. IT Cell-for display on Board Website.



Nandesari & PCCI Estate Map, Vadodara



For office use only
Draft only

