EDS 13/01/2019

- Please confirm whether all the existing (240 TPM) and proposed products (482 TPM) are synthetic organic chemicals, and thus requiring prior EC.

Reply: All existing (240 TPM) are synthetic organic chemicals. All 481 MTM out of 482 MTM proposed are synthetic organic chemicals, and thus requiring prior EC.

Only 1 ton products - *Section 6 "Steroid products (Single stage process/IP Grade)"* may not require EC as they are additional purification of products of *Section 5 "Steroid Products"*.

Mass balance with chemical reactions of all products is included in **Chapter 2 – Section 2.6.** Please see the list of products with applicability below.

Sr. No.	List of Products	Existing capacity in MT/ Month	Proposed addition in MT/ Month	Total Capacity in MT/ Month	Comment
1.	**Paraben Products**				
a.	Propyl Paraben	10	400	490	EC product (synthetic organic chemicals)
b.	Methyl Paraben	20			
c.	Sodium Propyl Paraben	20			
d.	Sodium Methyl Paraben	40			
	Total	**90**	**400**	**490**	
2.	**Niacin amide**	50	50	100	EC product (synthetic organic chemicals)
3.	**Metformin**	100	00	100	
New Products					
4.	**Niacin (Nicotinic acid)**	00	25	25	EC product (synthetic organic chemicals)
5.	**Steroid Products**				
a.	Beclomethasone Dipropionate	00	2.0	2.0	EC product (synthetic organic chemicals)
b.	Betamethasone Acetate				
c.	Betamethasone Dipropionate				
d.	Betamethasone Sodium Phosphate				
e.	Betamethasone 17 Valerate				
f.	Clobetasole 17 Propionate				
g.	Clobetasole Butyrate				
h.	Dexamethasone Sodium Phosphate				
i.	Hydrocortisone Hemi Succinate				
j.	Hydrocortisone Acetate				
k.	Methyl Prednisolone Acetate				
l.	Methyl Prednisolone Hemi succinate				
m.	Prednisolone Acetate				
n.	Prednisolone Sodium Phosphate				
o.	Methyl Coblamine				
6.	**Steroid products (Single stage process/IP Grade)**				
a.	Betamethasone IP	00	1.0	1.0	**Non-EC product** (additional purification/ Crystallization are involved to improve quality of synthetic organic products from Section 5)
b.	Dexamethasone IP				
c.	Methylprednisolone IP				
d.	Prednisolone IP				
e.	Hydrocortisone IP				
	Total	**240**	**482**	**722**	

- Please fill up/provide the relevant details in column 6 of Form-2.

Reply: For some technical error with the uploading system it was not visible at your end. We have re-uploaded the documents again with the help of NIC team.

Same are included in the Annexures of EIA report (Annexure-II – TOR Page no A-4; and Annexure-IV – Copy of EC Page no A-65).

- As per the ToR, permission for ground water withdrawal of 74 cum/day was to be submitted along with the EC proposal.

Reply: We have applied for CGWA application dated **16/04/2018**. The proof of same has been included in the Annexures of EIA report (Page no A-72 to A-74). The application is included in the column 15 of Form-2. We are yet to receive the NOC.

- Whether the ATR submitted to the Regional Office on 31/12/2018 has been accepted by them.

Reply: We have not received acceptance of ATR submitted to the Regional Office on 31/12/2018. We wish to inform you that Partially Complied Condition was related to greenbelt and Not Complied Condition was administrative mistake. We have committed to take care in future. See below summary of our reply to the Regional Office.

Sr. No.	Condition as per EC	Compliance Status as per RO, MoEF&CC and Action Taken
Partially Complied Condition		
A	**Specific Condition**	
xvii	Green belt shall be developed in 3,100 m^2 out of total plant area 9,394 m^2. Selection of plant species shall be as per the CPCB guidelines.	The company has developed greenbelt in an area of 1880 m^2 to mitigate the effect of fugitive emission. **Action Taken:** Additional greenbelt is planned with local native spices. Unit has already planted 200 new saplings, and has further plans of plantation before upcoming monsoon season.
Not Complied Condition		
B	**General Condition**	
xvii	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.	Unit has done financial closure in the year 2011-12, but did not inform to Ministry or any concerned authorities. Unit has started production after intimation of GPCB and obtain necessary permission i.e. CC&A/CTO. **Action Taken:** Unit will do so in future.

Old EDS for reference

EDS 27/12/2018

- No EIA/EMP uploaded against column 39(a) of Form-2.

- No Certified Compliance Report submitted against column 9(v) of Form-2.

- No entries in column 6 of Form-2. Please do the needful to take the proposal forward.

Reply:

Respected Sir,

Due to technical errors with the system these files were not uploaded successfully. We have uploaded them again.

Additionally, with size limit of 1 MB, it is not possible to upload the full Compliance Report here on Parivesh in *column 9(v)*. We have asked **NIC team** about this too, but *column 9(v)* of Form-2 only allows file smaller than 1 MB. Furthermore, it can't be included in the "*additional documents*" option, as it also allows file smaller than 1 MB.

With these system limitations, Full Compliance Report is included in *"Annexures" option* of EIA report as **Annexure-VIII** (Page no. A-83 to A-118).

Action taken on partially complied points of Certified Compliance Report has been submitted to MoEF&CC Regional office, too. Proof of same is attached herewith.

Thanks.

NEBULA HEALTH CARE

Factory : Survey No.:61, Chhatral-kadi Road,
B/h. Cedar Decor, Village: Ankhol-382721
Taluka : Kadi, Dist : Mehsana, Gujarat.

Postal Address : Millenium Plaza, 'B' Shop no. S.F. 19,
Opp. Swaminarayan Temple, Vastrapur,
Ahmedabad-380 015. (Gujarat) India.

To,

December 31, 2018

Additional Principal Chief Conservator of Forests
Ministry of Environment, Forests & Climate Change
Regional Office (West Zone), Kendriya Paryavaran Bhavan,
E-5 Arera Colony, Link Road 3,
Ravishankar Nagar,
Bhopal-462016 (MP)

Sub: Action taken report on partly complied points of Certified Compliance Report for Environment Clearance for our exiting unit – Nebula Health Care located at Survey No. 61, Opp. Suzuki Synthetic, Chhatral-Kadi Road, Village: Ankhol, Tal: Kadi, Dist.: Mehsana, Gujarat.

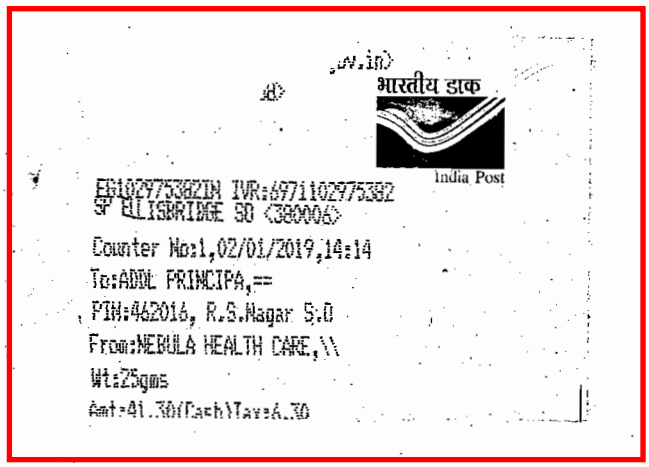
Ref.: 1) EC letter no. J-11011/420/2009 - IA II (I), dated 31.03.2011
2) CCR issued by MoEFCC, Regional Office vide letter 5-27/2011(ENV)/561 dated 15.10.2018

Respected Sir,

With reference to above subject and CCR issued by MoEFCC, Regional Office, we are enclosed herewith detailed action taken report on partly complied points of Certified Compliance Report of existing EC.

Thanking You,

For, **Nebula Health Care**

K M Chamaria

Proprietor