UPL VAPI
Inward No: 227
Date: 04/09/2017

SPEED POST

सत्यमेव जयते

भारत सरकार
GOVERNMENT OF INDIA
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE

क्षेत्रीय कार्यालय, पश्चिम क्षेत्र,
Regional Office, Western Region,
''केन्द्रीय पर्यावरण भवन''
"Kendriya Paryavaran Bhavan"
लिन्क रोड नं0-3/Link Road No. 3
E-5,रविशंकर नगर/Ravi Shankar Nagar,
भोपाल (म0प्र0)/Bhopal-462016 (M.P.)
फोन: 0755- 2465054, फैक्स: 0755- 2465054
अणुडाक /E-mail: bbbdx.dy@gmail.com

कमांक: 5-4/2010(पर्या)/945

दिनांक : 28.08.2017

प्रति,

श्री ज्ञानेश भारती,
संयुक्त सचिव
दुसरा तल, जल ब्लॉक
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,
इंदिरा पर्यावरण भवन,
जोर बाग रोड, अलीगंज,
नई दिल्ली – 110003

विषय: Environmental Clearance for expansion of existing pesticide unit at plot no. 3-11, GIDC Industrial estate, Vapi, Gujarat by M/s United phosphorus limited.

संदर्भ:. Ministry's letter No. J-11011/32/2007-IA.II (I) dated: 23.07.2008

महोदय,

मंत्रालय के उपरोक्त संदर्भित पत्रो के संदर्भ में उक्त परियोजनाओं को पर्यावरणीय दृष्टिकोण से अनुमति देते समय अनुबद्ध शर्तों के अनुपालन एंव certification of compliance के निर्देशानुसार, पर्यावरणीय अनुमति दिनांक 23.07.2008 का अनुवीक्षण प्रतिवेदन (मॉनिटरिंग रिपोर्ट) एतद् द्वारा संलग्न कर प्रेषित है ।

2.0 यह सक्षम प्राधिकारी द्वारा अनुमोदित है।

भवदीय
-Sd-
(बी.बी. बर्मन)
सलाहकार

संलग्न: उपरोक्तानुसार

प्रतिलिपि:

1. श्रीमति रीता खन्ना, निदेशक, (अनुवीक्षण सैल), पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,इंदिरा पर्यावरण भवन, जोर बाग रोड, अलीगंज,नई दिल्ली – 110003 की ओर सूचनार्थ एंव आवश्यक कार्यवाही हेतु।

2. Mr S.D. Namjoshi, UPL Limited, Uni # 00, Plot no. 3-11, A-2/1, A-2/2, A-2/6, A-1/2, Phase-I, Notified GIDC Industrial Estate, Vapi- 396195, Dist.- Valsad, Gujarat.

(बी.बी. बर्मन)
सलाहकार

Monitoring implementation of Environmental Safe Guards
Ministry of Environment &Forest Western Region,
Regional Office Bhopal
PART-1
DATASHEET

01	Project type		Expansion Project
02	Name of the project		An expansion project of existing pesticides Unit at Plot no. 3-11, A-2/1, A-2/2, A-2/6, A-1/2, Phase-1, Notified GIDC Industrial Estate, Vapi-396195, Dist.-Valsad, Gujarat.
03	Clearance letter no. and date		Environmental Clearance No. J-11011/32/2007-IA-II (I) dated 23rd July, 2007.
04	Location		
	A	District	Valsad
	B	State	Gujarat
	C	Location (latitude / longitude)	Latitude: 20.3514°N Longitude: 72.9096°E
05	Address for correspondence		
	A	Address of concerned Project Chief Engineer (with Pin Code & telephone / telex / fax numbers)	Mr S. D. Namjoshi UPL Limited, Unit # 00 Plot no. 3-11, A-2/1, A-2/2, A-2/6, A-1/2, Phase-1, Notified GIDC Industrial Estate, Vapi-396195, Dist.-Valsad, Gujarat. Phone # 0260-2401718
	B	Address of Executive Project Engineer / Manager	MrDevangAshar UPL Limited, Unit # 00 Plot no. 3-11, A-2/1, A-2/2, A-2/6, A-1/2, Phase-1, Notified GIDC Industrial Estate, Vapi-396195, Dist.-Valsad, Gujarat. Phone # 0260-2401718
06	Salient features		

	A	Of the Project	• Project incorporates all required technical commercial aspects of environment and safety right for inception stage. • Major Raw Material available nearby area of manufacturing site. • Recovery of useful By-products • Onsite solvent recovery system installed. Solvent recovery is above 95%. • DM water Plant installed for use in Boiler to save boiler blow down and heat.
	B	Of the EMP	• Condensate recovery system installed in MPBAD, DVACL and MEE. • Installed Solvent Absorption Unit for recycling hexane. • Stopped Cooling tower Blow down by installing Non chemical treatment. • Reaction Pot Cooling system installed on reaction pots in ALP plant to minimize P2O5 emissions. • Closed handling system installed for solid product packing viz., BF 20, UPH 203 &Propanil. • Installed MEE with capacity of 100 KLD. • Installed ATFD for MEE Salt Drying. • Installed retrievable type diffusers in Bio reactor for better efficiency. • Upgrade ETP Primary section with PLC control. • Installed Online monitoring system at ETP final outlet and connected to CPCB website. • Replaced ETP root blower by energy efficient screw blower to reduce noise level from 75 dB to <60dB. • Solid waste Auto loading system provided at ETP/ATFD to avoid manual handling of Hazardous waste and improve

			housekeeping. • Economizer with O2 Trim is provided to Boiler for Energy Conservation. • Steam jet Ejector replace by Dry Vacuum Pump for Energy Conservation. • Developed 550 m^2 of garden at ETP site. • Conventional lighting bulbs replaced by LED lamps in Pesticide, MMZ & DVACL Plants.
07	Break-up of the project area		
	A	Submergence area – forest and non-forest	There is no forest area involved in the project as the project located within Notified GIDC area.
	B	Others	Not Applicable.
08	Break-up of the project affected population with enumeration of those losing houses / dwelling units only, agricultural land only, both dwelling units and agricultural land; and landless labourers / artisans		
	A	SC, ST / Adivasi	Not Applicable as project located within Notified GIDC area.
	B	Others	
09	Financial details		
	A	Project cost as originally planned and subsequent revised estimates and the year of price reference	Project planned cost: Rs.120 Crore Project actual cost: Rs.80 Crore
	B	Allocation made for EMP with item-wise and year-wise break-up	As per Annexure-1
	C	BC ratio / IRR and the year of assessment	17 % in the year of 2014
	D	Whether (C) includes the cost of EM as shown above	yes
	E	Actual expenditure incurred on the project so far	Rs. 80 cr

	F	Actual expenditure incurred on the EMP so far	INR 21.48 Crore
10	Forest land requirement		
	A	The status of approval and diversion of forest land for non-forestry use	No forest land used for the project.
	B	The status of clearing felling	--
	C	The status of Compensatory Afforestation, if any	--
	D	Comments on the viability & sustainability of compensatory afforestation programme in the light of actual field experience so far	--
11	The status of clear felling in non-forest areas (such as submergence area or reservoir, approach roads) if any, with quantitative information required		Not Applicable as project located within Notified GIDC area.
12	Status of construction (actual and / or planned)		
	A	Date of commencement (actual and / or planned)	20.11.2007
	B	Date of completion (actual and / or planned)	01.06.2008
13	Reason for delay, if the project is yet to start		Not Applicable
14	Dates of site visits		
	A	The dates on which the project was monitored by the Regional Office on Previous occasions, if any	No visit so far.
	B	Date of site visit for this monitoring project	06.06.2017
15	Details of correspondence with project authorities for obtaining action plans / information on status of compliance to safeguards other than the routine letters for logistic support for site visits		Plant layout is approved by Factory inspector and Certificate of Stability is obtained. Certificate is attached as Annexure-2.
	(The first monitoring report may contain the details of all the letters issued so far, but the later reports may cover only the letters issued subsequently.)		--

16	Any Show Cause Notice / Closure Notices and status	No show cause notice is issued since last 2 year.
17	Any matter pending at Courts	There is no matter related to Environment, pending at Courts.
	Date & No. Letter from RO	**Date & No Reply from PA**
2.	13.06.2017 5-4/2010(ENV)/365 seeking clarification and comprehensive EC compliance report.	1. 01.05.2017 NIL seeking certified EC compliance report. 2. 08.07.2017 PL00/EC/2017-18/028 submitting detailed EC compliance report. **(Received on 09.08.2017)**

ANNEXURE-1

Sr No	Plant	Pollution Control Measure	EMS Capital Cost in INR (Crore)	O &M cost in INR(Crore) 2013-14(5%)	O &M cost in INR(Crore) 2014-15(5.5%)	O &M cost in INR(Crore) 2015-16(6%)	O &M cost in INR(Crore) 2016-17(6.5%)
1	Pesticide	Pesticide Plant-1 - Permethrin reaction	0.075	0.00375	0.004125	0.0045	0.0049
2	MMZ	Pesticide Plant-2 (ASAM)	0.075	Not in Operation	Not in Operation	Not in Operation	Not in Operation
3	ALP	Alp Plant Firing Chamber	0.35	0.0175	0.01925	0.021	0.0228
4	MPBAD	MPBAD Plant Reaction Vessel	0.125	0.00625	0.006875	0.0075	Not in Operation
5	DVACL	DVACl plant TCBACl Reactor	0.125	0.00625	0.006875	0.0075	Not in Operation
6	DVACL	DVACl Plant DVACl Reactor	0.125	0.00625	0.006875	0.0075	Not in Operation
7	DVACL	DVACl Plant PCl_3 scrubber	0.075	0.00375	0.004125	0.0045	Not in Operation
8	ZNP	ZnP Plant Reactor	0.075	0.00375	0.004125	0.0045	0.0049
9	DVACL	DVACl Plant Fugitive Emission scrubber	0.125	0.00625	0.006875	0.0075	Not in Operation
10	Pest	Lambda Cyhalothrin	0.09	0.0045	0.00495	0.0054	0.0059
11	UPH	Metribuzine	0.075	0.00375	0.004125	0.0045	0.0049
12	MEE	-	4.5	0.8748	0.68	0.60	0.40
13	ATFD	-	3.0				
		MEE ATFD Power cost		0.33	0.55	0.76	0.15
14	ETP	-	10.5	4.50	5.26	4.44	4.22
		ETP power cost	NA	0.97	0.97	0.92	0.66
15	CFB	Scrubber	2.0	NA	NA	NA	Not in Operation
16	ETP	TOC/TSS/Flow/pH meter -Online	0.17	0.0085	0.00935	0.0102	0.0111

ANNEXURE-2

VMS Consultant

J. J. Mistry
B.E. (Civil) C.E.
Chartered Engineer (Civil)
VMS Consultant
101, 1st Floor, Nirmal Chambers,
Near Hotel Apex Inn, Char Rasta,
G.I.D.C., VAPI-396 195
Tel.: (0260) 2420956
e-mail : vms_arc@yahoo.com

STB 2016-17/VMS/ 04

Date: 16-06-2016

FORM NO: 1-A

CERTIFICATE OF STABILITY

[1]:	NAME OF FACTORY	→	**UPL LIMITED.**
[2]:	VILLAGE, TOWN & DISTRICT IN WHICH THE FACTORY IS SITUATED.	→	Plot No: 3 to 11 & A2/1, A2/6 & A1/2 G.I.D.C. VAPI-396195 Dist: Valsad (Gujarat)
[3]:	FULL POSTAL ADDRESS OF THE FACTORY.	→	**UPL LIMITED.** Plot No: 3 to 11 & A2/1, A2/6 & A1/2 G.I.D.C. VAPI-396195 Dist: Valsad (Gujarat)
[4]:	NAME OF THE OCCUPIER OF THE FACTORY.	→	Shri Arun C.Ashar
[5]:	NATURE OF THE MFG.PROCESS TO BE CARRIED ON IN THE FACTORY.	→	Mfg. of Chemicals
[6]:	NUMBER OF FLOORS ON WHICH WORKERS WILL BE EMPLOYED.	→	Mfg. GF, 1st, 2nd & 3rd Floor.

I certify that, I have inspected the premises, the plans of which have been approved by Director, Industrial Safety & Health, Gujarat State – Ahmedabad wide letter no: **DIR / I S & H / F-PLAN / 1643 DT: 21-08-2015** and examined the various parts including the foundations with special references to the machinery, plant etc. that have been installed. I am of the opinion that all the works of engineering constructions in the premises is / are structurally sound and its/their stability will not be endangered by its/their use as a factory/part of a factory for **"Mfg.of Chemicals "** for which the machinery plants etc. installed are intended.

J.J.Mistry
VMS Consultant

COMPETENT PERSON FOR STABILITY BY GUJ/DISH/CPT/A/0154
VMS Consulting Engineer (Civil)

Qualification:- → B.E.(Civil)C.E.
→ Regd Competent Person
No: DISH / A / CPT GUJ / 0154
DIRECTOR, INDUSTRIAL SAFETY & HEALTH, GOVT OF GUJARAT

Associated Member of Institute Of Engineers (India) M/10424 I/O

Address:- → G.I.D.C. Vapi-396195

PART – II & III

DESCRIPTIVE REPORT ON STATUS OF COMPLIANCE FOR THE PERIOD OF OCTOBER 2016 - MARCH, 2017 TO CONDITIONS OF ENVIRONMENTAL CLEARANCE AND ENVIRONMENTAL MANAGEMENT

EC No. J-11011/32/2007-IA-II (I) dated 23.07.2007

Sr. No	Preamble of EC Conditions	Compliance Status
2	The Ministry of Environment & Forests has examined the proposal. It is noted that the proposal is to expand the existing Pesticides Unit at plot 3-11, GIDC, Vapi, Gujarat. The cost of the expansion is Rs. 37.70 Crores out which cost for environment management will be Rs. 04.00 Crores. The land area is 58,101 sq m out of which built up area is 49,068 sq m. Area required for expansion is 733.6 sq m which will be within the existing buildings only. Out of this, area under Green belt is 3000 sq m. River Damanganga is at 1.5 km and River Kotak is at 7 km from the site. The project does not involve an eco-sensitive zone in 7 km area of the site. The following changes in existing Product Mix and final quantities will be as follows:	Noted.

	S.No.	Products	Existing (A) MTM	Proposed Expansion (B) MTM	Capacity After Expansion (A) + (B)= (C) MTM
	1	Aluminum Phosphide (Fumigant)	150	50	200
	2	Zinc Phosphide (Rodenticide)	40	0	40
	3	Cypermethrin (Insecticide)	113.7	286.3	400
	4	Alpha Cypermethrin (Insecticide)	0	10	10
	5	Permethrin (Insecticide)	20.83	79.17	100
	6	Desmedipham (DMP) (Herbicide) OR Penmedipham (PMP) Either OR	0	100	100
	7	Bifenthrin (Insecticide)	0	20	20
	8	Clodinofop (UPH-203) (Herbicide)	0	20	20
	9	Safner (UPH-203 S) (Herbicide)	0	5	5
	10	Thiomethaxam (STAR) (Insecticide)	0	5	5
	11	Magnesium Phosphide (Fumigant)	0	8	8
	12	Metametron (Herbicide)	25	0	25
	13	Sulfosulfuron (Herbicide)	0	2	2
	14	Heptenophos (Pesticide)	8.33	0	8.33
		Total Pesticide	**357.86**	584.97	942.83
	15	Red Phosphorus (Non Pesticide)	100	-20	80
		Formulation Products			
	16	Pesticide Formulation Product	300	0	300
		Intermediate Products			

	17	Dichloro Vinyl Acid Chloride (DVACL)	120	**180**	**300**
	18	Metaphenoxy Benzaldehyde (MPBAD)	90	**185**	**275**
	19	ASAM	0	**2**	**2**
	20	Hydrazide	20	**0**	**20**
	21	Phosphorous Pentasulfide	350	**-350**	**0**
	Total Pesticide Intermediates		**580**	**17**	**597**

The following will be the change in the quantities of By-products:

	S. No.	Byproducts	Existing (MTM)	After Expansion (MTM)
	1	Phosphoric Acid (100 %)	15	25
	2	Hydrochloric Acid (30 %)	200	2048
	3	Spent Sulfuric Acid (46 -68 %)	335	1025
	4	Aluminum Chloride (20 %)	615	1130
	5	Sodium Sulfite (20%)	440	930
	6	Phosphorous Oxychloride	165	412
	7	Ammonium Chloride	82	34.8

3	The solvent recovery is about 95%.All liquid raw material will be stored in storage Tanks and Drums and will be transported by road. Water consumption will be 3790 KLD which will be met through GIDC water supply. All the incinerable waste shall be sent to the common incineration system of BEIL for incineration. Other waste shall be sent to the approved TSDF site of BEIL, Ankleshwar for which unit has membership. Natural gas will be used for Boiler as alternative fuel.	Solvent recovery is above 96% from spent solvent and will be further improved. With additional chilled water / brine in secondary condenser, the solvent vapour recovery is increasing and fugitive emissions are reduced. To reduce fugitive emissions, scrubbers are also provided through condenser. All liquid raw materials are being kept in drums & suitable storage tanks only. The entire water requirement is met by GIDC water supply only. Our water consumption is well within the limit prescribed by GPCB. Water cess return is also being submitted regularly. Avg water consumption is @ 623.27 KLD against GPCB permissible limit of 3815.23 KLD for period Oct 2016 to Mar 2017. **The copy of water-cess assessmentis attached herewith as Annexure-8.** We have taken membership **(Please refer Annexure- 4)** of BEIL and sending hazardous wastes (landfillable and incinerable) to BEIL regularly. The detail of wastes disposed off is given below (Oct 2016 to Mar 2017): Average Landfillable waste @ 271.95 MT per Month against GPCB permitted quantity @ 1337.81 MT per Month. Average Incineration waste @ 24.05 MT per Month against GPCB permitted quantity @ 715.12 MT per Month. We are using natural gas as a fuel for boiler. **Complied.**
4	The project activity is listed at 5(b) and 5(f) in the Scheduled of EIA Notification, 2006 and is of A Category. The project is submitted under the EIA Notification, 2006 for evaluation of completeness of Draft EIA/EMP and for additional TORs, if any, as per Para 2.2.2 (b) of the Interim Operational Guidelines dated 13th October 2006 issued by the Ministry. Since the proposed project is in industrial area, It would not need Public Consultation as per Para 7(i) III. Stage (3) (b) Public Consultation of EIA Notification, 2006.	**Noted.**
5	Based on the information provided, the Ministry of Environment and Forests hereby accords environmental clearance to above project under the provisions of EIA Notification dated 14th September 2006 subject to the compliance of the following Specific and General conditions:	**Noted.**
A. SPECIFIC CONDITIONS:		

i	The gaseous emissions (SO_2, NOX, VOC and HC) particulate matter from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.	PP stated that they do process sta monitoring once in a month through their la and through third party (ENPRO Envirotec and Engineers Pvt Ltd).Summarize monitoring data of ENPRO Envirotech an Engineers Pvt Ltd is given below:

Parameter	*Average Monitoring results (Oct 2016 to Mar 2017)*	*GPCB Permissible Limit*
Flue Gas Stack Emissions- Fuel as Natural Gas		
Stack attached to Boiler 1- 10 TPH		
PM	16-130 mg/nm3	150
SO2	45.3-52.3 ppm	100
Nox	4.3-14.1 ppm	50
Stack attached to Thermic fluid heater- Propanil plant		
PM	BDL mg/nm3	150
SO2	BDL ppm	100
Nox	8.8-12.3 ppm	50
Stack attached to Boiler 2- 8 TPH		
PM	28-121 mg/nm3	150
SO2	BDL-55.4 ppm	100
Nox	3.1-17.2 ppm	50
Stack attached to DG Set-1250 KVA		
PM	82 mg/nm3	150
SO2	33.4 ppm	100
Nox	21.9 ppm	50
Process Stack Emission		
Stack attached to Mist Eliminator & Water Scrubber- ALP plant firing chamber		
PM	2.9-5.6 mg/nm3	20
P2O5 as H3PO4	2.64-3.45 mg/nm3	5
Stack attached to Mist Eliminator- ZnP plant Reactor		
PM	9.6-13.5 mg/nm3	20
P2O5 as H3PO4	1.86-3.04 mg/nm3	5
Stack attached to Lambda Cyhalothrin Plant- Alkali Scrubber		
HCl	4.9 mg/nm3	20
SO2	12.4 mg/nm3	40
Stack attached to Metribuzine Plant- Water + Caustic Scrubber		
HBR	2.1-3.8 mg/nm3	5

All parameters are well within GPCB permissible limit. **The detailed report is attached as Annexure-2.**

Complied

Complied.

ii	New Standards for pesticides unit, as proposed by the CPCB under the E (P) A, 1986 shall be followed by the Unit.	PP stated that they are following the new norms prescribed for pesticide sector. GPCB has already included new norms in CC&A as mentioned in sl. No. (i). **Complied.**
iii	Stacks of 30.5 m will be provided with the Boilers and 15.5 m with D.G. Sets for dispersion of emissions	PP confirmed that they have provided all stack heights of 30.5 meter for Boiler and 15.5 meter for the D.G. Set as per CPCB guideline. **Complied.**
Iv	Water /Alkali Two stage Scrubber systems, Mist Eliminator with Koch filter and Wet Scrubber with Mist Eliminator shall be installed for the boilers Thermic Fluid heaters, D.G. Sets and process stacks from pesticides (tech), pesticide intermediates and AlP, ZnP plant. The scrubbed water shall be sent to ETP for further treatment.	PP stated that they are using natural gas as a fuel in Boilers. Mist eliminator & Demister are provided along with water scrubber in AlP and ZnP plant. Thermic Fluid Heaters are natural gas based only. DG Sets are only for emergency power in case of power failure. The scrubbed water generated from each process scrubber is being sent to ETP for further treatment. **Complied.**

Regular monitoring of emissions from the stack shall be carried out for HC and VOC, besides the criteria pollutant. Levels of HC and VOC shall also be monitored in the ambient air at various probable locations in and around the plant.

PP stated they do process stack & ambient a monitoring through our lab and through thi party (ENPRO Envirotech and Engineers P Ltd).Summarized monitoring data of ENPR Envirotech and Engineers Pvt Ltd is give below:

Parameter	*Average Monitoring results (Oct 2016 to Mar 2017)*	*GPCB Permissib le Limit*
Flue Gas Stack Emissions- Fuel as Natural Gas		
Stack attached to Boiler 1- 10 TPH		
PM	16-130 mg/nm3	150
SO2	45.3-52.3 ppm	100
Nox	4.3-14.1 ppm	50
Stack attached to Thermic fluid heater-Propanil plant		
PM	BDL mg/nm3	150
SO2	BDL ppm	100
Nox	8.8-12.3 ppm	50
Stack attached to Boiler 2- 8 TPH		
PM	28-121 mg/nm3	150
SO2	BDL-55.4 ppm	100
Nox	3.1-17.2 ppm	50
Stack attached to DG Set-1250 KVA		
PM	82 mg/nm3	150
SO2	33.4 ppm	100
Nox	21.9 ppm	50
Process Stack Emission		
Stack attached to Mist Eliminator & Water Scrubber- ALP plant firing chamber		
PM	2.9-5.6 mg/nm3	20
P2O5 as H3PO4	2.64-3.45 mg/nm3	5
Stack attached to Mist Eliminator- ZnP plant Reactor		
PM	9.6-13.5 mg/nm3	20
P2O5 as H3PO4	1.86-3.04 mg/nm3	5
Stack attached to Lambda Cyhalothrin Plant- Alkali Scrubber		
HCl	4.9 mg/nm3	20
SO2	12.4 mg/nm3	40
Stack attached to Metribuzine Plant- Water + Caustic Scrubber		
HBR	2.1-3.8 mg/nm3	5

PARAMETERS	Avg Monitoring Result (Oct 2016 to Mar 2017)	GPCB Permissible Limit (µg/m3)
PM10	71-83 µg/m3	100
PM2.5	27-41 µg/m3	60
SO2	19.8-32.6 µg/m3	80
NOX	30.4-43.2 µg/m3	80
CL2	BDL	100
HCL	65.3-85.3 µg/m3	200
PCL3	BDL	100
P2O5	BDL	30
Br2	BDL	20
HBR	BDL	300

Complied

All parameters are well within GPCB permissible limit. **The detailed report is**

vi	The locations of ambient air quality monitoring stations shall be reviewed in consultation with the State Pollution Control Board (SPCB) and additional stations shall be installed, if required in the downwind direction as well as where maximum ground level concentration are anticipated.	PP has stated that they have installed three Ambient Air Monitoring stations as per SPCB guideline and are in operation. **Complied.**
vii	FO as fuel in boilers shall be replaced with natural gas as early as possible.	PP has stated that they are using only natural gas as fuel in boiler. FO is being used only in an emergency. **Complied.**
viii	Use of toxic solvents like Methylene Chloride (M.C.) etc. shall be minimized to the extent possible. No Benzene shall be used as solvent and no odorous compounds/gas like Mercaptans or Hydrogen Sulfide shall be used or formed in any of reactions at the site.	PP has stated that they are not using/generated Methylene Chloride OR Benzene or Mercaptans at the site. **Not Applicable**
ix	Bioassay test and toxicity index shall be carried out regularly.	PP has stated that they do Bioassay and toxicity test through our Internal lab as well as through external party (ENPRO Envirotech and Engineers Pvt Ltd). As per third party result, average 90 to 92 % fish survival ratio is obtained by keeping fish for 96 hrs in 100% treated effluent, while Toxicity Factor is achieved as 1. **Complied.**
x	All the storage tanks will be under negative pressure to avoid any leakages. Breathers, N2 blanketing and condensers will be provided for all the storage tanks. Closed handling systems for chemicals and solvents will be provided. Magnetic seals will be provided for pumps/agitators for reactors for reduction of fugitive emissions. Chilled Brine based condensers shall be used to prevent VOC emissions. Solvent traps shall be installed wherever necessary.	PP has stated that nitrogen blanketing is used for certain material storages. Breather valves are provided for solvent storages wherever necessary. Closed handling system and Seal-less pumps/Mechanical seal are provided for hazardous/toxic chemical handling such as bromine, PCL3, POCL3, Phenol. Solvent traps/ Condensers are provided. Chilled Brine system is provided for VOC emission control. VOC monitoring is being carried out through third party (ENPRO Envirotech and Engineers Pvt Ltd) and **result is attached herewith as Annexure-3.** **However, storage tanks are not stated to be under negative pressure.** **Partly Complied.**

xi	All venting equipment shall have vapors recovery system. All the pumps and other equipment's where there is a likelihood of HC leakages shall be provided with Leak Detection and Repair (LDAR) system and LEL indicators and Hydrocarbon detectors. Provision for immediate isolation of such equipment, in case of a leakage will also be made. The company shall provide a well-defined Leak Detection and Repair (LDAR) programme for quantification and control of fugitive emissions. The detectors sensitivity will be in ppm levels.	PP has stated as under: All venting of equipment are connected t condensors/ process Scrubbers to scrub exces vapour. LDAR (Leak Detection And Repairs) syster is being followed to reduce VOC / HC emission. We also do third party (ENPRC Envirotech and Engineers Pvt Ltd) VOC/ HC monitoring and report is attached herewith We also monitor LEL through LEL meter. I addition, on line sensors are provided witl alarm system for hazardous chemicals lik Cl2, NeBR, HCL, SO2, NOx, phosphine etc. Usage of seal less pumps for toxic chemicals. Mechanical seals for certain reactors. Regular inspections are carried out witl reference to plant operations like Pumps Valves, Pipes etc, as per maintenanc software (SAP). **Complied.**
xii	Spent solvents shall be recovered as far as possible & solvent recovery shall be further increased from the present 95% to at least 98 percent. Solvent vapors emitted during purification process from purification tanks as fugitive emissions shall be reduced as far as possible.	PP stated as under: Solvent recovery is above 96% from spen solvent and will be further improved. Fo example, Hexane Recovery in Cypermetrir above **96.7%;** Butyl Acetate recovery in Penmediphan above **96.9%;** Toluene recovery in safne above **96.7%**. With additional chilled water / brine ir secondary condenser, the solvent vapou recovery is increasing and fugitive emission are reduced. To reduce fugitive emissions scrubbers are also provided through condenser. **Complied.**
xiii	Phosphorous shall be stored under water to prevent fuming.	PP has stated that they have kept practicing to store phosphorous under water only. **Complied.**
xiv	Phosphine monitors in Aluminum Phosphide plant shall be installed. Portable monitoring instruments for other gases like Chlorine and Ammonia shall be provided.	PP has stated that they have already installed Phosphine &Chlorine monitors in ALP & MPBAD Plants respectively. **Complied.**
xv	Fugitive emissions in the work zone environment, product, raw materials storage area shall be regularly monitored. The emissions shall conform to the limits imposed by the State Pollution Control Boards/Central Pollution Control Board.	PP has stated that they fugitive emission is controlled by using seal-less pumps for toxic chemicals, flange-guards, mechanical seals for pumps and reactors etc. VOC monitoring is being carried out through third party (ENPRO Envirotech and Engineers Pvt Ltd) and **result is attached herewith as Annexure-3.** However, there is no such standards are provided for fugitive emissions by SPCB/ CPCB. **Complied.**

xvi	No ground water will be used for the project. The waste water generation from the Process / Wash, Cooling Tower / Boiler water Blow down and Domestic shall not exceed 2,398 KLD which will be treated in modified and upgraded ETP of the company.	PP has stated as under: We are not using ground water and the entire water requirement is met by GIDC water supply only. Our water consumption is well within the limit prescribed by GPCB. Water cess return is also being submitted regularly. Avg water consumption is @ 623.27 KLD against GPCB permissible limit of 3815.23 KLD for period Oct 2016 to Mar 2017.
	After the expansion, high TDS low COD effluent will be segregated and sent to MEE and High COD low- TDS effluent will be sent to incinerator of BEIL.	Average effluent discharge @ 385.43 KLD against GPCB permissible limit of 2405.94 KLD for period Oct 2016 to Mar 2017. All effluent streams are being treated in ETP. **The CETP Membership Certificates is attached as Annexure-5.** The summarized third party (ENPRO Envirotech and Engineers Pvt Ltd) data is a s follows (Oct 2016 to March 2017):

Sr No	Parameters	GPCB Permissible Limit	CETP Permissible Limit	Average Result
1	pH	6.5-8.5	6.5-8.5	6.95
2	COD	250 mg/l	1000 mg/l	131.33
3	TSS	100 mg/l	300 mg/l	75.33
4	Amm. N2	50 mg/l	50 mg/l	9.22

	Cyanide bearing effluent will be detoxified and then sent to ETP after checking cyanide and pesticide levels.	The effluent with high TDS is being treated in MEE and High COD with higher calorific value effluent is sent to BEIL for incineration. Avg. TDS data for MEE inlet- 250000 mg/l.
	Only the normal effluent will be sent to company's ETP for further treatment to achieve GPCB norms. The treated effluent will be disposed off into CETP through GIDC, Vapi drainage system.	Cyanide carrying effluent is detoxified with sodium hypo chloride and sent to ETP for further treatment after analyzing cyanide in particular effluent stream. The treated effluent is sent to CETP Vapi for further treatment and disposal through underground drainage system. All parameters are well within GPCB/CETP permissible limit. **Complied.**

xvii	Hazardous and toxic waste generated during process like distillation residue, spent carbon, spent mixture solvents, process organic residue shall be segregated and sent for treatment and disposal. Incinerable waste shall be incinerated in a common incineration facility or otherwise these may be incinerated in a properly designed in-house incinerator with energy recovery facility.The incinerator shall meet the CPCB standards and guidelines. Hazardous wastes temporary storage shall be properly maintained and stock shall be minimum. Hazardous Waste containers shall be properly labeled.	PP stated as under: We do not have any in-house incinerator i the unit. We are members of the Commo Incineration Facility operated by BEIL Ankleshwar and all types of incineratio waste is being sent to BEIL for incineratio regularly. Online manifest system is adopte for sending the waste to BEIL along wit tracking system. We do not have any hazardous waste storag area and all hazardous waste is being sent t BEIL for land filling & incineration an minimum stock is kept at the site. **BEIL Membership certificate is attached a Annexure-4.** **Complied.**
xviii	Emissions from the incinerator shall be with in the prescribed norms for the incinerators. Monitoring Protocol as prescribed in these standards shall be followed.	**PP has stated that this is Not Applicable** a they do not have any captive incinerator. Al incineration waste is being sent to BEIL fo incineration. **Not Applicable**
xix	The company shall undertake following Waste Minimization measures. • Metering and control of quantities of active ingredients to minimize waste. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. • Use of automated filling to minimize spillage. • Use of Close Feed system into batch reactors. • Venting equipment through vapor recovery system. • Use of high pressure hoses for equipment clearing to reduce wastewater generation.	PP stated as under: Hazardous waste is being monitored o weekly basis and report is being sent to to management. In addition to this, we have dedicate departments such as Green Cell, MaxPro Maxpro+ who are working on to reduce waste generation at source. we are generating few by-products an consume as a raw material within a plant or a other unit wherever applicable. We have also adopted automated system fo filling and packing. Also, closed loop syster is used in reactors to minimize wastage. All venting of equipment are connected t condensors/ process Scrubbers to scrub excess vapour. We are using high pressure hose system fo equipment cleaning. **Complied.**
xx	The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in 2000 for handling of hazardous chemicals. Necessary approvals from Chief Controller of Explosives must be obtained before commissioning of the expansion project. Requisite On-site and Off-site Disaster Management Plans will be prepared and implemented. Regular mock drills shall be carried out for both On-site and Off-Site plans.	PP stated as under: We have got an approval from Chief Controller of Explosives as per the requirements. On Site Emergency Plan is updated and mock drills are conducted regularly on quarterly basis. We have submitted required data for off site emergency plan which is coordinated by District authorities. **Complied.**

xxi	All Transportation of Hazardous Chemicals shall be as per the MVA, 1989. As submitted by the unit to the Ministry, transportation of Hazardous Chemicals shall be switched over to the railways.	PP stated that the discussion in under progress. **Not Complied.**
xxii	The company shall develop rain water harvesting structures to harvest the runoff water for recharge of ground water.	PP stated that they are collecting the rain water from Admin building & canteen area and utilized for gardening/nearby cooling tower. We do not recharge ground water as per local restriction. **Complied.**
xxiii	Minimum 25% of the total area shall be developed as green belt as per the CPCB guidelines.	PP stated that their total greenbelt area is 5.66 acre (approx.. 33 %) against total available land area of 17.20 acre. In addition to this, they have also earmarked 5 Acres of Land for various plantations including teakwood trees at our nearby land on Survey no.39/1at Village Nahuli. **During inspection it was seen that there was practically no plantation in periphery. The PP has decided to make plantation out side of the premises as they do not have space in and around the unit. Therefore very meager plantation has been done. Serious attempt has to be made to address to issue for full compliance. Based on the quantum of tree observed inside the plant, the condition cannot to be concluded complied.** **Partly Complied.**
xxiv	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	PP stated that the company is having full time medical doctor and also Occupational Health & Safety. Pre-employment and routine medical examinations are being carried out. We are also doing full body medical checkup by external expert agency once in two years. All medical records are being maintained. **Sample of medical report is attached as Annexure-6.** **Complied.**
xxv	Training shall be imparted to all employees on safety and health aspects of chemicals handling. As informed to the Ministry, OHSAS 18001 shall be continued. 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.	PP stated that pre-employment and routine medical examinations are conducted. Training is imparted to all employees. There is Safety Talk every day. **Complied.**
xxvi	Usage of PPE's by all employees/ workers shall be ensured.	PP stated that proper PPE's are given to all employees and workers. **Complied.**
xxvii	The company shall strictly follow all the recommendations mentioned in the Charter on Corporate Responsibility for Environmental Protection (CREP).	PP stated that all points are implemented. Details are given as **Annexure-9.** **Complied.**
xxviii	The Company shall harvest surface as well as rainwater from the rooftops of the buildings proposed in the expansion project and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	PP stated that they are collecting the rain water from Admin building & canteen area and utilized for gardening/nearby cooling tower. We do not recharge ground water as per local restriction. **Complied.**

xxix	All the recommendations made by the consultants in respect of environmental management and risk mitigation measures relating to the project shall be implemented.	PP stated as under: All the recommendations with respect t Environment Management Plan and Ris Assessment have been implemented. Environmental Cell / Green cell– in operation Water Environment – segregation, prope treatment and disposal. Air Environment – air pollution contro systems installed and operated. Noise Environment – monitoring being don and within limits. Green belt development – developed greei belt and further area being developed. Health and Safety – implemented OHSA 18001, Risk Mitigation measures ar implemented. On Site Emergency Plan updated – mock drills are conducted regularly. **Complied.**
xxx	The company will undertake all relevant measures, as indicated during the Public Hearing for improving the Socio-economic conditions of the surrounding area. CSR activities will be undertaken by involving local villages and administration.	PP stated that public hearing was no conducted for this particular project as pe Notification of 2006. However, CSF Activities are undertaken by the Company anc **list of CSR activities is attached a Annexure-7.** **Complied**

xxxi	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment. The eco-development plan should be submitted to the SPCB within three months of receipt of this letter for approval.	PP stated as under: Various eco-development activities are undertaken. Training programs on cleaner production was organized at our Company along with GPCB / GCPC. The Company has taken various CSR activities in Vapi / surrounding area report is attached as Annexure- One of the major CSR activities taken up by the UPL Group is setting up and operation of an Engineering College – Shroff S R Rotary Institute of Chemical Technology – approximately 15 kms from the Ankleshwar. In addition to this, the company has taken various initiatives such as, • Supporting the common effluent treatment plant. • Supporting the local notified industrial estate in municipal solid waste collection and treatment (Supported by giving technology for kitchen waste treatment). • Creating Environmental awareness in local community including celebration of Energy Conservation Week & National Safety Week. • Supporting Vapi Industries Association in organizing environmental activities. **Complied.**
	B. GENERAL CONDITIONS:	
i	The project authorities shall strictly adhere to the stipulations made by the State Pollution Control Board.	PP stated that they are complying all conditions of CC&A given by GPCB. **Please find valid CC&A copy as Annexure-1 for your ready reference.** **Complied.**
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	PP stated that the Unit has not done any modification OR expansion without getting prior approval from the Ministry. Valid EC/NOC/CC&A received from the Government Authorities for any expansion OR modification. **However, during inspection a number of storage sheds were observed along with construction of a new building. PP in reply stated as under:** Project work : **The project works are going on in the factory are of revamping and re-structuring of our existing old plants viz. DVACLwe have stopped manufacturing of DVACL since Feb, 2016.** Temporary shed : temporary sheds are built every year as per requirement of plant and its surrounding area for rain protection. **It may be seen if this tantamount to violation/unauthorized construction..** **Inconclusive.**

iii	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	PP stated that they do internal monitorin through our lab as well as through third part (ENPRO Envirotech and Engineers Pvt Ltc once in a month and Summarized monitorin data is given below:

Parameter	*Average Monitoring results (Oct 2016 to Mar 2017)*	*GPCB Permissible Limit*
Flue Gas Stack Emissions- Fuel as Natural Gas		
Stack attached to Boiler 1- 10 TPH		
PM	16-130 mg/nm3	150
SO2	45.3-52.3 ppm	100
Nox	4.3-14.1 ppm	50
Stack attached to Thermic fluid heater- Propanil plant		
PM	BDL mg/nm3	150
SO2	BDL ppm	100
Nox	8.8-12.3 ppm	50
Stack attached to Boiler 2- 8 TPH		
PM	28-121 mg/nm3	150
SO2	BDL-55.4 ppm	100
Nox	3.1-17.2 ppm	50
Stack attached to DG Set-1250 KVA		
PM	82 mg/nm3	150
SO2	33.4 ppm	100
Nox	21.9 ppm	50
Process Stack Emission		
Stack attached to Mist Eliminator & Water Scrubber- ALP plant firing chamber		
PM	2.9-5.6 mg/nm3	20
P2O5 as H3PO4	2.64-3.45 mg/nm3	5
Stack attached to Mist Eliminator- ZnP plant Reactor		
PM	9.6-13.5 mg/nm3	20
P2O5 as H3PO4	1.86-3.04 mg/nm3	5
Stack attached to Lambda Cyhalothrin Plant- Alkali Scrubber		
HCl	4.9 mg/nm3	20
SO2	12.4 mg/nm3	40
Stack attached to Metribuzine Plant- Water + Caustic Scrubber		
HBR	2.1-3.8 mg/nm3	5

All parameters are well within GPCE permissible limit. **The detailed report is attached as Annexure-2.**
Complied.

iv	The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October, 1994 and January, 2000. Authorization from the SPCB shall be obtained for collection, treatment, storage, and disposal of hazardous wastes.	PP stated that they are complying all rules and regulations as per MSIHC Rules and Hazardous waste (Management, Handling & transboundary Movement) rule 2008. We have obtained Authorization from SPCB(**Please refer Annexure-1**). **Complied.**
V	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. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	PP stated that noise monitoring is being done once in a month through third party (ENPRO Envirotech and Engineers Pvt Ltd). Ear muffs & ear plugs are provided to the person working in high noise area like air compressor, blower etc. Acoustic enclosures are also provided. Noise parameter range (Oct 2016 to Mar 2017) is as follows: Range: 57.8 to 74.3 dB (GPCB Permissible limit- 75 dB) **The detailed report is attached as Annexure-2.** **Complied.**
vi	The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report.	PP stated as under: All the recommendations with respect to Environment Management Plan and Risk Assessment have been implemented. Environmental Cell – in operation. Water Environment – segregation, proper treatment and disposal. Air Environment – air pollution control systems installed and operated. Noise Environment – monitoring being done and within limits. Green belt development – developed green belt and further area being developed. Health and Safety – implemented OHSAS 18001, Risk Mitigation measures are implemented. On Site Emergency Plan updated – mock drills are conducted regularly. **Complied.**

vii	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	We have separate Environmental Management Cell. Additionally, Company have Green Cell working exclusively on improving in environmental performance by converting waste streams into valuable products, improving ETP performance etc. Water, Stack Monitoring, Bio Assay Test, T_f Factor Test, Ambient Air Monitoring, VOC monitoring, Solid Waste Analysis, Noise Level Monitoring are carried out in our full-fledged internal laboratory. Also, Environmental Audit is being carried out regularly. **Complied.**
viii	The project authorities shall earmark separate funds of Rs. 04.00 Crores to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	PP stated that the Company has spent **INR 21.48 crores** for environmental protection measures along with the projects implemented. The revenue expenditure for environmental protection measures is included in our budget and sufficient amount is available. **The detail of expenditure is given separately.** **Complied.**
ix	The implementation of the project vis-à-vis environmental action plans shall be monitored by the concerned Regional Office of the Ministry/SPCB / CPCB. A six monthly compliance status report shall be submitted to monitoring agencies.	PP stated that they are submitting the half yearly compliance report in October and April every year to the Ministry/SPCB/CPCB. **Complied.**
x	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://envfor.nic.in. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	PP stated that advertisement was given Gujarati & English Newspaper and details submitted to GPCB and MoEF. **It was found that they advertisement was publish in TOI on 30.07.2007 and in gujarati divya bhaskar on 1st August 2007. However, this was not within 7 days.** **Not Complied.**

<table>
<tr><td>xi</td><td>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.</td><td>PP stated that they are giving details of the projects implemented along with the half yearly report. We are giving below the details of the projects implemented.

<table>
<tr><th>Sr No</th><th>Name of Product</th><th>Date of commencement of production</th></tr>
<tr><td>1</td><td>Aluminium Phosphide (Fumigant)</td><td>1974</td></tr>
<tr><td>2</td><td>Zinc Phosphide (Rodenticide)</td><td>1975</td></tr>
<tr><td>3</td><td>Cypermethrin (Insecticide)</td><td>1984</td></tr>
<tr><td>4</td><td>Permethrin (Insecticide)</td><td>2000</td></tr>
<tr><td>5</td><td>Desmedipham</td><td>2008</td></tr>
<tr><td>6</td><td>Penmedipham</td><td>2008</td></tr>
<tr><td>7</td><td>Biferthrin</td><td>2008</td></tr>
<tr><td>8</td><td>Clodiniofop (UPH – 203)</td><td>2008</td></tr>
<tr><td>9</td><td>Safner (UPH – 203 S)</td><td>2008</td></tr>
<tr><td>10</td><td>Thiomathaxam (STAR)</td><td>2008</td></tr>
<tr><td>11</td><td>Magnesium Phosphide (Fumigant)</td><td>2008</td></tr>
<tr><td>12</td><td>Red Phosphorous</td><td>1969</td></tr>
<tr><td>13</td><td>Pesticide Formulation Product</td><td>1996</td></tr>
<tr><td>14</td><td>Dichloro Vimyl Chloride(DVACL)</td><td>1996</td></tr>
<tr><td>15</td><td>Metaphenoxy Benzaldehyde (MPBAD)</td><td>1984</td></tr>
<tr><td>16</td><td>ASAM</td><td>2008</td></tr>
<tr><td>17</td><td>Hydrazide</td><td>2008</td></tr>
<tr><td>18</td><td>Propanil</td><td>2011</td></tr>
<tr><td>19</td><td>Imidachloprid</td><td>2012</td></tr>
<tr><td>20</td><td>Metribuzin</td><td>2012</td></tr>
<tr><td>21</td><td>Alpha Cypermethrin</td><td>2011</td></tr>
<tr><td>22</td><td>Metamitron</td><td>2012</td></tr>
<tr><td>23</td><td>Labda Cyhalothrine</td><td>2012</td></tr>
<tr><td>24</td><td>Denatonium Benzoate</td><td>2014</td></tr>
</table>

Deemed Complied.</td></tr>
<tr><td>6</td><td>The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.</td><td>PP stated they have Noted.</td></tr>
<tr><td>7</td><td>The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.</td><td>PP stated they have Noted.</td></tr>
</table>

8	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 Hazardous Wastes (Management and Handling) Rules, 2003 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	**PP stated they have Noted.**

1.0 Summary:

Out of 45 total conditions, it may be seen that 34 are fully complied, 2 are partly complied, 1 i inconclusive, 2 are not complied, 2 are not applicable, 1 is deemed complied and 3 are noted by PP b compliance. These have been explained in the foregoing compliance report against each of th conditions, and the PP needs to take necessary and time bound action for early compliance in respect o the relevant conditions.

2.0 Court cases and show cause notice

PP informed that that there is no court case and show cause notice against the unit.

3.0 **Reply to RO- Bhopal's letter dated 13-06-2017**

Reply to RO- Bhopal's letter dated 13-6 2017 is attached.

Scientist C

PL00/EC/2017-18/028
July 8, 2017

Annexure

The Director,
Ministry of Environment, Forest & Climate Change,
Western Region Office, Kendriya Paryavaran Bhavan,
Link Road # 3, E – 5, Ravi Shankar Nagar,
Bhopal – 462 016 (M.P.)

Kind Attn : **Mr. B. B. Barman**

Sub : **Environmental Clearances for expansion project.**

Ref : Your letter No. 5-4/2010(ENV)/365 dtd 13.06.2017 and your visit our Unit on 06.06.2017

Dear Sir,

We are in receipt of your above referred letter and have noted the contents therein.

We would like to submit our point wise reply as follows :

2 (i) Present status of work (physical / civil) progress :
We have obtained Environmental Clearance # J-11011/32/2007-IA-II-I dated 23.07.2007 and consequently, we have obtained CTE / CTO from Gujarat Pollution Control Board. Project is implemented and Product wise date of commencement of production – Annexed as **Annexure-I**

2 (ii) **A comprehensive compliance report** in respect of all conditions of EC
We are regularly submitting half yearly Environmental Clearance condition compliance report to MoEF&CC, CPCB and GPCB. Our last report submitted to MoEF Bhopal is for the period October, 2016 to March, 2017 vide our letter dated 1.5.2017, which is Annexed as **Annexure – II.** The same is also uploaded on our web site.

2 (iii) Copies of

(a) EIA / EMP / Form : EIA is annexed as **Annexure – III**
(b) CTE /CTO from GPCB : We are enclosing herewith CTE # GPCB/ CE/NOC/VSD-3137/CCA-VSD-218/31860 dated 16.11.2007 and CTE # 82155 dated 29.10.2016 along with CTO # AWH-60886 dated 03.03.2014 and Amended CTO #

GPCB/CCA-VSD-218(3)/ID-24711/ 405177 dated 23.02.2017 as **Annexure – IV**

(c) Recommendations of the Public Hearing – Not applicable since the Unit is located within notified industrial estate
(d) Copy of advertisement : Annexed as **Annexure – V**

2 (iv) Details of Show Cause / Closure Notice issued by GPCB/CPCB during last 3 years :
We have not received any Show Cause Notice / Closure Notice from SPCB / GPCB during last three years

2 (v) Details of court cases - NIL

2 (vi) Information about any expansion / replacement / construction work undertaken without valid approval / EC : As on today, we do not have any expansion / replacement / construction work without approval / EC. We have stopped DVACL production due to structural problems and structural strengthening work is under progress

2 (vii) **PA shall clarify any direction of CPCB on online monitoring etc :**
Complied.
Our Unit is coming under Pesticide Sector. As per CPCB guideline for Pesticide Sector for online monitoring system, we have Implemented online monitoring system for pH, TOC, TN, COD, BOD, TSS and Flow since August 2015 at ETP final outlet and connected to CPCB server as per direction of CPCB.

2(viii) Information in Data Sheet – Complied

The information in Data sheet was submitted to MoEF along with our last half yearly EC condition compliance report for the period October, 2016 to March, 2017 submitted vide our letter dated 01.05.2017. The same is Annexed as **Annexure – VI**

3 Justification for project work in progress and temporary sheds

Project work : The project works are going on in the factory are of revamping and re-structuring of our existing old plants viz. DVACLwe have stopped manufacturing of DVACL since Feb, 2016.

Temporary shed : temporary sheds are built every year as per requirement of plant and its surrounding area for rain protection.

4&5 **Green belt & farmland area :**
The Unit was established in the year 1969 at Vapi Estate. We have developed green belt in available space area and total green belt area is about 7,091 sq m. As this is old unit and facing space constraint, we have developed green belt about 3 kms away from our Unit i.e. Nahuli (Vikram Farm). Total area at Nahuli (Vikram Farm) is 505857 Sq M. Our Unit total plot area is 72283 Sq M. Our green belt development is more than 33 %.

Photographs are annexed as **Annexure – VII** showing green belt at the Unit

Photographs is annexed as **Annexure – VIIIs showing green belt at Nahuli (Vikram Farm), with following species**

Sr. No.	Plants	Nos.
1	Teak	104520
2	Neem	25
3	Mango	1680
4	Rain Tree	30
5	Babool	21
6	Chikoo	65
7	Banyan tree	15
8	Pipal	10
9	Coconut	400
10	Silk cotton	75
11	Bamboo	200
12	Subabbol	500
13	Sarru	79
14	Amala	45
15	Nimboo	15
16	Supari	10
17	Umara plants	10

Trust, you will find the above in line with your requirements.

Thanking you,

Yours faithfully,
For **UPL Limited**

Subodh Namjoshi
Sr. General Manager - Manufacturing

Encl : Annexure I to VIII.

Copy to : The Zonal Officer, CPCB, Parivesh Bhavan,
Opp- VMC Ward Office # 10, Subhanpura, Vadodara – 390 023.

: The Regional Officer, GPCB, Vapi ***GPCB XGN ID # 24711***

UPL

September 26, 2017

Unit # 00
Plot # 3-11, GIDC, Vapi – 396 195, Gujarat

The Director,
Ministry of Environment, Forest & Climate Change,
Western Region Office, Kendriya Paryavaran Bhavan,
Link Road # 3, E – 5, Ravi Shankar Nagar,
Bhopal – 462 016 (MP)

Kind Attn : Mr. B. B. Barman

Sub :- Environmental Clearances compliance certificate

Ref :- EC Compliance certificate # 5-4/2010(Env)/945 dated 28.08.2017;
Environmental Clearance # J-11011/32/2007-IA.II(I) dated 23.07.2007

Dear Sir;

Kindly refer your visit to our Unit on 06.06.2017 with respect to certification of compliances to the conditions in Environmental Clearance obtained by our Vapi Unit. Also, kindly refer the Compliance Certificate issued vide your letter # 5-4/2010(Env)/945 dated 28.08.2017.

We are giving below clarifications with respect to the points mentioned as non-complied / inconclusive:

Condition No. of EC	Condition Description	Compliance Status
XXI	All transportation of hazardous chemicals shall be as per MVA 1989. As submitted by PP to MoEF, transportation of hazardous chemicals shall be switched over to railways	Considering characteristic of hazardous chemical, we are partially obtaining through railway and remaining by roads and further discussion is also going on with regards to this matter COMPLIED
II	No further expansion or modification in the plant shall be carried out without prior approval of MoEF. In case of deviation or alteration in project proposal from those submitted to MoEF for Clearance, Fresh Reference shall be made to MoEF to assess adequacy of conditions imposed and add	We have not started any expansion / modification in the plant for increasing the capacity of products without approval of MoEF / SPCB. For any modernization / product mix change, we have applied to State Pollution Control Board and obtained product mix change CTE / CC&A. During your visit, revamping work / re-

Condition No. of EC	Condition Description	Compliance Status
	additional environmental protection measures required, if any	structuring work was going on for our existing old plants viz. DVACL. We have stopped manufacturing of DVACL since February 2016 We have submitted intimation to concerned authority about above revamping COMPLIED
X	PP shall inform the public that project has been accorded EC by MoEF and copies of EC letter are available with SPCB and may also be seen at website of MoEF at www.moef.nic.in. This shall be advertised within seven days from the date of issue of EC letter, at least in two local newspapers that are widely circulated in the region of which one shall be in vernacular language of the locality concerned and copy of same shall be forwarded to concerned Regional Office of MoEF	EC dated 23.07.2007 was received by us on 27.07.2007 Advertisement was given in Gujarati and English newspapers. Details were submitted to GPCB and MoEF Advertisement was published in The Times of India on 30.07.2007 and in Gujarati language, it was published in Divya Bhaskar dated 01.08.2007 COMPLIED

We hope that you will find the above details in order.

Thanking you

Yours faithfully
For, UPL Limited

S M KARHALE
General Manager (Environment)

Copy to : The Member Secretary (Industry2 EAC)
Ministry of Environment Forests & Climate Change
Indira Paryavaran Bhavan
Jor Bagh Road, Ali Ganj
New Delhi – 11 0003