

Ref.No:POL/U-II/EC/13-14/220

Date : 02.01.2014

To,
Dr. A. Mehrotra,
Director (S) Ministry of Environment &
Forests,
Regional Office, Western Region, Kendriya
Paryavaran Bhavan
Link Road No.3, E-5, Ravi Shankar Nagar
BHOPAL- 462016 (MP)

Sub: Half yearly Environmental clearance compliance Report-Manufacture of alpha Pinene, Beta Pinene, Limonene and byproducts by way of backward integration at MIDC, Mahad by M/s Privi Organics Ltd.- Environmental Clearance Regarding.

Ref: Environment Department, MS, SEIAA Letter – SEAC 2010/CR.824/TC-2 Dated 2nd Nov' 2011

Dear Sir,

With reference to the proposal for Grant of Environmental clearance for manufacture of alpha pinene, beta pinene, limonene and byproducts by way of backward integration at MIDC, Mahad by Privi Organics Limited; we are submitting herewith the six monthly compliance report for period of June 2013 – November 2013. We are also enclosing the letter considering our proposal for Grant of Environmental Clearance herewith.

We will mail you the soft copies of the report to the Email: ajaymehrotra13@gmail.com

Also we are enclosing herewith CD of the documents mentioned above for your reference. We will be sending the compliance report regularly to this office.

Thanking You,

Yours faithfully,

For Privi Organics Limited

H.M.RAFIQ
General Manager- QEHS Systems

Copy to: 1. Shri.P.M.A.Hakeem, IAS (Retd), Chairman, SEIAA.
2. Shri. Dr.S.Devotta, Chairman, SEAC.
3. Member Secretary, MPCB.
4. Secretary, Environment Department & MS.
5. Regional Office, MPCB-Raigad
6. Collector, Raigad.
7. IA-Division, Monitoring Cell, MoEF, Paryavaran Bhavan
8. Director (TC-1), Dy.Secretary (TC-2), Scientist-1, Environment Department
9. Sub Regional Officer, MPCB-Mahad-Raigad

Annexure-A

Compliance Report		
SEAC 2010/CR.824/TC-2		Dated 2 nd Nov' 2011
<i>Manufacture of alpha Pinene, Beta Pinene, Limonene and byproducts by way of backward integration at MIDC, Mahad by M/s Privi Organics Ltd.- Environmental Clearance Regarding</i>		
Point No	SPECIFIC CONDITIONS	COMPLIANCE STATUS
i	This environmental clearance is issued subject to land use verification. Local Local authority/ planning authority should ensure this. This environmental clearance issued with respect to the environmental consideration and it does not mean that state Level Impact Assessment Authority (SEIAA) approved the proposed land use.	Plant is in approved MIDC area. MIDC Permitted to use the land for industrial purpose vide agreement Mahad/1351/2009/1/26 dated: May7, 2009.
ii	'Consent for Establishment' shall be obtained from Maharashtra Pollution Control board under air and water act and a copy shall be submitted to the environment department before start of any construction work at the site.	CTE obtained from MPCB vide no: BO/RO-Raigad /RO (P&P)/EIC-RD-1750-10/E/CC-40 DATED: 08.03.2011. Copy of the same has been submitted to Env. Dept, Maharashtra vide letter no: POL/U-II / ENV /12-13/169 Dtd: 22.11.2012
iii	No land development work/construction work preliminary or otherwise relating to the project shall be taken up without obtaining due clearance from respective authorities.	CTO is obtained from MPCB vide no:BO/JD-PAMS/EIC.NO-RD-2437-12/R/CC-MPCB/13/00823 Dt. 24/01/2013.
iv	No additional land shall be used / acquired for any activity of project without obtaining proper permission.	No additional land used.
v	For controlling fugitive natural dust regular sprinkling of water and wind shields at appropriate distances in vulnerable areas of the plant shall be ensured.	Yes. It is being practiced.
vi	Regular monitoring of air quality, including SPM and SO2 level both in work zone and ambient air shall be carried out in and around the power	Monitoring is done for Ambient Air quality including SPM and SO2.

	plant and record shall be maintained. The location of monitoring stations and frequency of monitoring shall be decided in consultation with the from Maharashtra Pollution Control board (MPCB) and submit report accordingly to MPCB.	AAQM report, conducted by MoEF approved party is attached under Annexure-1.
vii	A detailed scheme for rain water harvesting shall be prepared and implemented to recharge ground water.	Scheme is prepared to use rainwater in the process thereby reducing the MIDC water consumption. Total cost for rain water harvesting is 6 lacs. Total water received from rainwater – 4423 m3.
viii	Arrangement shall be made that effluent and storm water does not get mixed.	Separate storm and effluent drainage are provided.
ix	Periodic monitoring of ground water shall be undertaken and result analyzed to ascertain any change in the quality of water .Result shall be regularly submitted to the Maharashtra Pollution Control board.	No permission is granted by MIDC for ground water bore well for drawing samples, as the industry is in approved industrial estate.
x	Leq of Noise level shall be maintained as per standards. For people working in the high noise area, requisite personal protective equipments like ear plug etc. shall be provided.	Noise levels are being monitored and found Within acceptable limits. PPE, like earplugs are provided to workmen.
xi	Proper housekeeping program shall be implemented.	Yes. Complied. Housekeeping is maintained.
xii	The overall noise level in and around the plant are 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 conforms to the standards prescribed under Environment (Protection) Act, 1986Rules 1989.	Noise levels are being monitored and found Within acceptable limits. Refer Annex II
xiii	Green belt shall be developed and maintained around the plant periphery. Green belt Development shall be carried out considering CPCB guidelines including selection of plant species and	Development of Green Belt has been initiated Considering CPCB / MPCB guidelines. Around 100 saplings have been planted inside the premises.

	in consultation with the local DFO /Agriculture department.	
xiv	Adequate safety measures shall be provided to limit the risk zone within the plant boundary, in case of accident. Leak detection devices shall also be installed at strategic places for early detection and warning.	Adequate safety measures are taken to control the hazard and keep it below the acceptable limit. Leak detection systems are installed and monitored regularly.
xv	Occupational health surveillance of the workers shall be done on regular basis and record maintained as per Factories act.	Being complied
xvi	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.	Fire hydrant and sprinkler system is provided and maintained to ensure smooth operation at all times.
xvii	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous waste in accordance with the Hazardous Waste (Management and Handling) Rules 2003(amended) Authorization from the MPCB shall be obtained for collection / treatment /storage/disposal of hazardous waste.	Obtained authorisation from MPCB vide no BO/JD-PAMS/EIC.NO-RD-2437-12/R/CC-MPCB/13/00823 Dt. 24/01/2013. The conditions mentioned in the authorisation are strictly complied.
xviii	The company shall undertake following Waste Minimization Measures. <ul style="list-style-type: none"> a. Metering 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 process. c. Maximizing recoveries. d. Use of automated material transfer system to minimize spillages. e. Use of “closed feed” system into batch reactors. 	<p>We have installed adequate metering system with state of the art DCS system.</p> <p>We intend to sell the byproduct to MPCB authorized party.</p> <p>Systems are in place supported by strong R&D and technical support</p> <p>We have well equipped material handling system.</p> <p>Already in place.</p>
xix	Regular mock drills for the onsite emergency management plan shall be carried out. Implementation of changes /improvements required, if any, in the	Mock drills are conducted periodically. Opportunities for improvement are noted and incorporated in onsite emergency plan. We also successfully carried out off site mock drill in coordination with various civil authorities on 22 February 2013

	onsite management plan shall be insured.	
xx	A separate environment management cell with qualified staff shall be set up for implementation of stipulated environmental safeguards.	Complied. Existing environment management cell, having qualified staff is looking after the EHS activities.
xxi	Transportation of ash will be through closed containers and all measures should be taken to prevent spilling of ash.	Not applicable, as no ash is being generated.
xxii	Fly ash utilization as per fly ash Notification No.SO763 (E) dated 14.09.1999 (amended) and as per direction of MPCB.	Not applicable, as no fly ash is being generated.
xxiii	Separate silos will be provided for collecting and storing of bottom ash fly ash.	Not Applicable
xxiv	Separate funds shall be allocated for implementation of Environmental protection measures /EMP along with item wise break up .These cost shall be included as part of project cost. The funds earmarked for Environmental protection measures shall not be diverted for any other purpose and year wise expenditure should be reported to MPCB and this office.	Yes. Separate funds of Rs. 161.50 Lakhs are Earmarked for the total project. We have installed fully equipped incinerator for incineration of sulphate containing waste. Incinerator is provided with required pollution control facilities. In addition to this, We have also installed carbon and silica column for removal of sulphur. Also we intend to improve the quality of product by providing more no.of carbon and silica columns for removal of sulphur in near future Brief description of the process is given as Annexure - Refer Annex III
xxv	The project management should submit half yearly compliance report in respect of stipulated prior environment clearance terms and conditions in hard	This is the third half yearly report. Being Submitted to MPCB and Env. Dept, MS.

	and soft copies to MPCB and this department on 1 st June and 1 st December of each year.	
xxvii	<p>A copy of clearance letter shall be sent by proponent to the concerned municipal corporation and the local NGO, if any, from whom suggestions /representations if any were received while processing the proposal.</p> <p>Clearance letter shall also be put on the web site of the company by the proponent.</p>	<p>Not applicable, as no representations have been Received during processing the proposal.</p> <p>Complied. EC has been put in the company website</p>
xxviii	<p>The Proponent shall upload the status of compliance of the stipulated EC conditions, including the result of monitored data on their web site and shall update the same periodically.</p> <p>It shall simultaneously be sent to regional office of MoEF, respective zonal office of CPCB and SPCB. The criteria pollutant level namely SPM, RSPM, and SO₂, NO_x (Ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.</p>	<p>Complied. Compliance of the status has been Uploaded in the company website.</p> <p>Compliance of the status is being sent to RO of MoEF and Zonal Officer of CPCB and the SPCB.</p> <p>Ambient Air quality report is displayed at main gate of the company.</p>
xxix	The project Proponent shall also submit six monthly reports on the status of compliance of including the result of monitored data (both in hard copies as well as e-mail) to the respective regional office of MoEF respective zonal office of CPCB and the SPCB.	Compliance of the status is being sent to RO of MoEF and Zonal Officer of CPCB and the SPCB.
xxx	The environmental statement for each financial year ending 31 st March in form V as is mandated to be submitted by the project Proponent to the concerned state Pollution Control board as prescribed under the Environment	Will be complied.

	(Protection) Rules. 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC Conditions and shall also be send to the respective Zonal of MoEF by e-mail.	
xxxi	The environmental clearance is being issued without prejudice to the court case pending in the court of law and it does not mean that project Proponent has not violated any environmental laws in the past and whatever decision of the Hon'ble court will be binding on the project Proponent. Hence this clearance does not give immunity to the project Proponent in the case filed against him.	Not Applicable, as no pending case in the court Of Law.

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