

**GOVERNMENT OF INDIA
MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE
(IA DIVISION-INDUSTRY-3 SECTOR)**

Dated: 05.04.2021

**MINUTES OF THE 8th EXPERT APPRAISAL COMMITTEE (INDUSTRY-3 SECTOR)
MEETING HELD ON MARCH 25, 2021**

**Venue: Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhawan,
Jor Bagh Road, New Delhi-110003 through Video Conferencing (VC)**

Time: 10:30 AM

DAY 1: MARCH 25, 2021 (THURSDAY)

(i) Opening Remarks by the Chairman

The Chairman made hearty welcome to the Committee members and opened the EAC meeting for further deliberations.

(ii) Confirmation of the Minutes of the 7th Meeting of the EAC (Industry-3 Sector) held during March 11-12, 2021 at MoEFCC through VC.

The EAC, having taken note that final minutes were issued after incorporating comments offered by the EAC (Industry-3 Sector) members on the minutes of its **7th Meeting of the EAC (Industry-3) held during March 11-12, 2021** conducted through Video Conferencing (VC), and as such no request has been received for any modifications, in the minutes of the project/activities, **confirmed the same.**

After welcoming the Committee Members, discussion on each of the agenda items was taken up ad-seriatim.

Details of the proposals considered during the meeting **conducted through Video Conferencing (VC)**, deliberations made and the recommendations of the Committee are explained in the respective agenda items as under:-

Consideration of Environmental Clearance

Agenda No. 8.1

Manufacturing of Pigments, Solvent Dyes, Disperse Dyes and Various Dye Intermediates (400 MT/month) at Survey No. 410, Village: Neja, Tal:- Khambhat, Dist.-Anand, Gujarat by M/s Coastech Chemicals Pvt Ltd- Consideration of Environment Clearance

[Proposal no. IA/GJ/IND3/201144/2020, IA-J-11011/110/2020-IA-II(I)]

The project proponent and the accredited Consultant M/s. San Envirotech Pvt. Ltd. made a detailed presentation on the salient features of the project and informed that:

The proposal is for environmental clearance to the project for manufacturing Pigments, Solvent Dyes, Disperse Dyes and various Dye Intermediates of capacity 400 MTPM, located at Survey no. 410, Village Neja, Taluka Khambhat, District Anand, Gujarat by M/s Coastech Chemicals Pvt Ltd.

The details of products and capacity are as under:

S. No.	Name of the Products	CAS No.	Quantity MT/Month	
(A)	Pigment			
1.	Pigment Red 2	6041-94-7	50	
2.	Pigment Red 3	2425-85-6		
3.	Pigment Red 4	2814-77-9		
4.	Pigment Red 5	6410-41-9		
5.	Pigment Red 12	6410-32-8		
6.	Pigment Red 14	6471-50-7		
7.	Pigment Red 48:1	7585-41-3		
8.	Pigment Red 49	1248-18-6		
9.	Pigment Red 52:1	17852-99-2		
10.	Pigment Red 53	2092-56-0		
11.	Pigment Red 57:1	5281-04-9		
12.	Pigment Red 63:1	6417-83-0		
13.	Pigment Red 63:2	35355-77-2		
14.	Pigment Red 81	12224-98-5		
15.	Pigment Red 112	6535-46-2		
16.	Pigment Red 169	12237-63-7		
17.	Pigment Red 172	1227-78-0		
18.	Pigment Red 173	1227-77-9		50
19.	Pigment Blue 15:4	147-14-8		
20.	Pigment Violet 1	1326-03-0		
21.	Pigment Violet 1x	--		
22.	Pigment Violet 3	1325-82-2		
23.	Pigment Violet 27	12237-62-6		
24.	Pigment Violet 29	81-33-4	(B) Solvent Dyes	
25.	Solvent Red 23	85-86-9		40
26.	Solvent Red 24	85-83-6		
27.	Solvent Red 111	82-38-2		
28.	Solvent Red 127	61969-48-0		

29.	Solvent Red 135	71902-17-5/ 20749-68-2	
30.	Solvent Red 151	144013-41-1	
31.	Solvent Red 160	69899-68-9	
32.	Solvent Red 168	71832-19-4	
33.	Solvent Red 169	27354-18-3	
34.	Solvent Red 179	479-27-6	
35.	Solvent Red 197	52372-39-1	
36.	Solvent Red 207	15958-69-6	
37.	Solvent Red 227	2944-28-7	
38.	Solvent Yellow 33	8003-22-3	30
39.	Solvent Yellow 114	7576-65-0	
40.	Solvent Yellow 93	4702-90-3	
41.	Solvent Orange 60	61969-47-9	
42.	Solvent Blue 35	17354-14-2	
43.	Solvent Blue 36	14233-37-5	
44.	Solvent Violet 13	81-88-1	
45.	Solvent Violet 14	67577-84-8	
46.	Solvent Green 3	128-80-3	
47.	Solvent Green 33	10671-57-8	
(C) Disperse Dyes			
48.	Disperse Red 50	12223-35-7	40
49.	Disperse Orange 25	12223-22-2	
50.	Disperse Orange 30	12223-23-3	
51.	Disperse Yellow 114	61968-66-9	
52.	Disperse Yellow 211	86836-02-4	
53.	Disperse Red 167	61968-52-3	
54.	Disperse Red 13	3180-81-2	
55.	Disperse Red 362	158129-94-3	
56.	Disperse Red 277	70294-19-8	
57.	Disperse Blue 354	104137-27-1	
(D) Direct Dyes			
58.	Direct Black 168	3818-60-8	30
(E) Intermediates			
59.	Methyl violet liquid	42535	25
60.	1,8-Diamino Naphthalene	479-27-6	135
61.	Quinizarine	81-64-1	
62.	1,5-Dichloro Anthraquinone	82-46-2	
63.	4 Nitro 2 Amino Phenol 5 Sulphonic Acid (4 NAPSA)	896-67-3	
64.	4 NAP	99-57-0	
65.	2,5 Dichloro Phenol	583-78-8	

66.	Di Methyl Pyridone (DMP)	1122-58-3	
67.	N Butyl 3 Cyno 6 Hydroxy 4 Methyl 2 Pyridone (BMP)	39108-47-9	
68.	N 3 Methoxypropyl 3 Cyno 6 Hydroxy 4 Methyl 2 Pyridone (3 MMP)	29333-76-4	
69.	N ethyl 3 Cyano 6 Hydroxy 4 Methyl 2 Pyridone (EMP)	28141-13-1	
70.	2,4 - Dichloro - 3,5 - Dinitro Benzotrifluoride	--	
Total			400

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 Expert Appraisal Committee (EAC) in the Ministry.

The standard ToR has been issued by Ministry vide letter no. IA-J-11011/110/2020-IA-II (I); dated 23/07/2020. Public Hearing for the project has been conducted by the Gujarat Pollution Control Board on 05.02.2021, which was presided over by the Additional District Magistrate. The main issues raised during the public hearing are related to employment to local people and development of surrounding area as a part of CER. PP reported that there is no Litigation pending against the proposal.

The land area available for the project is 9600 m². Industry will develop greenbelt in an area of 35% i.e. 3360 m², out of total area of the project. The estimated project cost is Rs. 12.0 Crore. Total capital cost earmarked towards environmental pollution control measures is Rs. 1.6 Crore and the Recurring cost (operation and maintenance) will be about Rs. 1.85 Crore per annum. Total employment will be 60 persons. It is proposed to allocate Rs. 24 lakhs towards Corporate Environmental Responsibility.

There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, and Wildlife Corridors etc. within 10 km distance of the project site. Pond of Lunej Village is at a distance of 1.8 km in NW direction.

Ambient air quality monitoring was carried out at 8 locations during December, 2019 to February, 2020 and the baseline data indicates the ranges of concentration as: PM₁₀ (64.7 - 76.1 µg/m³), PM_{2.5} (36.4 - 46.7 µg/m³), SO₂ (13.0 - 16.8 µg/m³), NO_x (16.8 - 19.8 µg/m³). AAQ modelling study for point source emission indicated that the maximum incremental GLCs after the proposed project would be 1.466 µg/m³, 0.377 µg/m³, 0.392 µg/m³, 0.079 µg/m³ and 0.013 µg/m³ with respect to PM₁₀, SO₂, NO_x, HCl and Cl₂. The resultant concentrations are within the national ambient air quality standards (NAAQS).

Total water requirement is 118 m³/day of which fresh water requirement of 43 m³/day will be met from Ground Water Source – Bore well. 75 m³/day will be recycled/treated water.

Sources of industrial effluent generation will be from process, washing, boiler blow down, cooling bleed off, Lab and scrubber w/w. Total trade effluent (108 KLD) will be taken into ETP, after treatment, entire effluent will be passed through RO. RO permeate (75.0 KLD) will be reused within premises and RO reject (33.0 KLD) will be spray dried into in-house spray dryer. Thus, unit proposed to achieve Zero Liquid Discharge (ZLD). Sewage (4.5 KLD) will be disposed into soak pit through septic tank.

Power requirement will be 750 kVA and will be met from Madhya Gujarat Vij Company Ltd. (MGVCL). Unit proposed to install 2 D.G. Sets of 750 kVA each capacity and will be used as standby during power failure. Stack (height 11 meters) will be provided as per CPCB norms to the proposed D.G. Set.

PP reported that in proposed unit, 2 nos. of Agro Briquettes/Coal fired Boilers (3 TPH each), one Agro Briquettes/Coal fired Boiler (5.0 TPH), 2 nos. of Agro Briquettes/Coal fired Hot Air Generator (5 Lakhs Kcal/hr each) and one Agro Briquettes fired Thermic Fluid Heater (5 Lakhs Kcal/hr.) will be installed. Multi cyclone, Bag filter & Water Scrubber will install on Boiler of 5 TPH with stack height of 30 m, Multi Cyclone and bag filter with a stack height of 30 m will be installed on 2 nos. Boilers of 3 TPH and stack height of 21 m (common stack of HAG & TFH) on HAG & TFH for controlling the particulate emissions within the statutory limit of 150 mg/Nm³ for the proposed utilities.

Process emission generation will be from one vent of process reactor of 1,5 Dichloro-anthraquinone, one vent of process reactor of 4-NAPSA (Sulphonation), one vent of process reactor of 4-NAPSA (Reduction), 1 stack attached to Agro Briquettes fired Spray Dryer (1500 Liter/hr. – for effluent), 1 stack Spray Dryer (500 Liter/hr. – For product) and 1 common vent of 4 nos. of Spin Flash Dryers (500 Kg/hr.). Water & Alkali Scrubber will be installed to control process emission from reactor. Cyclone separator followed by wet scrubber will be provided as APCM on spray dryer and In-built bag filter will be installed on Spin Flash Dryer.

Details of Solid waste/Hazardous waste generation and its management.

S. No.	Name of waste	Source	Category of waste as per HW Rule, 2016	Qty.	Disposal method
1.	ETP sludge Salt from spray dryer	ETP	35.3	40 MT/month 37.5 MT/month	Collection, Storage, Transportation, Disposal at TSDF site.
2.	Discarded Containers/	Material storage	33.1	2000 Nos./Year	Collection, Storage, Decontamination, Transportation,

	Liner/Bags			1 MT/Year	Disposal by selling to Authorized Recycler.
3.	Used Oil	Driving units	5.1	500 Lit/Year	Collection, Storage, Transportation, Disposal by selling to registered re-refiners.
4.	Spent H ₂ SO ₄ (70-75%)	From Product 4 NAPSA	26.3	300 KL/month	Collection, Storage and captive consumption (in 4 NAP and 2, 5 DCP)
Solid Waste					
1.	Fly Ash	From APCM	--	125 MT/month	Collection, Storage and sell to brick manufacturers.

Deliberations in the EAC:

The EAC, constituted under the provision of the EIA Notification, 2006 and comprising of Experts Members/domain experts in various fields, examined the proposal submitted by the Project Proponent in desired form along with EIA/EMP report prepared and submitted by the Consultant accredited by the QCI/ NABET on behalf of the Project Proponent.

The EAC noted that the Project Proponent has given an undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environmental concerns and the projected scenario for all the environmental components. The Committee found the baseline data and incremental GLC due to the proposed project within NAAQ standards. The Committee also deliberated on the activities/action plan and found to be addressing the issues in the study area and public hearing concerns. The Committee suggested that the storage of toxic/explosive raw material shall be bare minimum in quantity and inventory. The project proponent submitted an undertaking stating that rainwater/roof water harvesting shall be ensured and collected water shall be utilized in the unit. It was also informed that Rs.8 lakhs has been allocated for development of 3360 sqm. greenbelt. The recurring amount of greenbelt development will be now Rs. 2.5 lakhs/Annum considering high salinity of soil and water. The Committee found the additional information submitted by the project proponent to be satisfactory and addressing to the concerns of the Committee.

The EAC deliberated on the proposal with due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC found the proposal in order and have recommended for grant of environmental clearance.

The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

The EAC, after detailed deliberations, **recommended** the project for grant of environmental clearance, subject to compliance of terms and conditions as under, and general terms of conditions at **Annexure:-**

- (i). The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.
- (ii). As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises. Treated effluent shall be reused in the process/utilities. Treated Industrial effluent shall not be used for gardening/greenbelt development/horticulture.
- (iii). 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.
- (iv). The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
- (v). Occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
- (vi). Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.

- (vii). 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.
- (viii). Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (ix). Volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.99% with effective chillers/modern technology.
- (x). Total fresh water requirement shall not exceed 43 cum/day, proposed to be met from bore well. Prior permission in this regard shall be obtained from the concerned regulatory authority/CGWA. Project activities shall be started only after obtaining permission for water extraction.
- (xi). Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.
- (xii). 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.
- (i). 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/adjacent areas. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map. Trees have to be planted with spacing of 2m x 2m and number of trees have to be increased accordingly. The plant species can be selected that will give better carbon sequestration. All trees must be planted within first year.
- (xiii). As committed, at least Rs 3.5 lakhs shall be allocated for conservation of Schedule I species. The implementation report shall be submitted to the IRO, MoEFCC.

- (xiv). The activities and the action plan proposed by the project proponent to address the socio-economic/public hearing issues in the study area, shall be completed as per the schedule presented before the Committee and as described in the EMP report in letter and spirit.
- (xv). A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

Agenda No. 8.2

Expansion of Fertilizer Unit with addition of Chemical Unit (MBAPL-II) at Plot No. A2 Saurai Industrial Area, Village Saurai, Tehsil Banda, Sagar, Madhya Pradesh, Sagar-470335 (Madhya Pradesh) by M/s Madhya Bharat Agro Products Limited - Consideration of Environmental Clearance

[IA/MP/IND3/202182/2019, IA-J-11011/314/2019-IA-II(I)]

The Project Proponent and the accredited Consultant M/s Gaurang Environmental Solutions Pvt. Ltd. made a detailed presentation on the salient features of the project and informed that:-

The proposal is for Environmental Clearance to the project for Expansion of Fertilizer Unit with addition of Chemical Unit (MBAPL–Unit - II) situated at Plot No. A-1 & A-2, Sourai Industrial Area, Village Sourai, Tehsil Banda, District Sagar, Madhya Pradesh by Madhya Bharat Agro Products Limited.

The details of products and capacity as under:

S. No.	Product Details	Existing (MTPA)	Proposed (MTPA)	Total (MTPA)
1	Di Ammonium Phosphate & Nitrogen and phosphorus complex (DAP/NPK Complex fertilizer) and water-soluble fertilizers & Fortified with Zinc, Boron, and Sulphur.	0.0	3,30,000	3,30,000
2	Zinc Sulphate	0.0	13,200	13,200
3	Gypsum Granular	0.0	1,00,000	1,00,000
4	Vinyl Sulphone	0.0	2,400	2,400
5	Calcium Nitrate & Fortified with Zinc, Boron, and Sulphur.	0.0	66,000	66,000
6	Sulphate of Potash (SOP)	0.0	19,800	19,800
7	Single Super Phosphate (SSP)	1,80,000	0.0	1,80,000

8	Granulated Single Super Phosphate (GSSP)	1,80,000	0.0	1,80,000
9	Triple Super Phosphate (TSP)	66,000	0.0	66,000
10	Synthetic Gypsum	1,65,000	0.0	1,65,000
11	Beneficiated Rock Phosphate (BRP)	1,89,000	0.0	1,89,000
<i>Products not requiring EC</i>				
12	Linear Alkyl Benzene Sulphonic Acid (LABSA)	0.0	33,000	33,000
13	Phosphoric Acid	19,800	1,00,000	1,19,800
14	Sulphuric Acid	0.0	2,00,000	2,00,000
15	Ammonia	0.0	1,00,000	1,00,000
16	Nitric Acid	0.0	66,000	66,000
17	Sodium Silica Fluoride (SSF)	1,320	0.0	1,320

The project/activities are covered under category A of item 5(a) 'Chemical fertilizers' of the Schedule to the Environment Impact Assessment Notification, 2006, and requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

The ToR has been issued by Ministry vide letter No. J-11011/314/2019-IA-II (I) dated 12.12.2019. Public Hearing for the proposed project has been conducted by the State Pollution Control Board on 20.08.2020. Public Hearing was presided by District Collector. The main issues raised during the public hearing are related to employment, ground water contamination and road maintenance and construction of computer room in Govt. School, Sorai. No litigation is pending against the proposal.

The MPSEIAA, Bhopal, had issued EC earlier vide letters no. 1309/EPCO-SEIAA/12 (MPSEIAA-Case no. 557/2010) dated 14.03 2012 and 7305/SEIAA/2015 (MPSEIAA-Case no 1708/2013) dated 06.11.2015 to the existing project in favour of M/s Madhya Bharat Agro Products Limited. The certified compliance report from IRO MOEFCC was obtained on 04.12.2020 and further certified Action Taken Report for the compliance has been obtained by IRO, MoEFCC, Bhopal on 16.02.2021. The Committee deliberated the compliance status of ECs and found in order.

The existing land area is 3,26,404 m². No additional land will be used for proposed expansion. Industry has already developed 33.03% green belt and will develop greenbelt in an area of 2.97 % i.e., 1,17,500m² out of total area of the project. The estimated project cost is Rs. 436.75 Crore including existing investment of Rs. 78.00 crores. Total capital cost earmarked towards environmental pollution control measures for existing and proposed project is Rs. 4,097.36 Lacs (Existing – Rs.384.64 Lacs and Proposed –Rs. 3,713.02 Lacs) and the Recurring cost for existing and proposed cost (operation and maintenance) will be about Rs. 634.1 Lacs per annum (Existing – Rs.79.6 Lacs and Proposed-Rs.554.5 Lacs). Total Employment will be for 381 persons as direct & 50 persons as indirect after expansion. Industry proposes to allocate Capital Cost Rs. 226.52 Lacs as Social Action plan as part of Environmental Management Plan as per the latest MoEF&CC OM No. 22-65/2017-IA.III dated 30th September, 2020.

There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/ Elephant Reserves, Wildlife Corridors etc. within 10 km distance from the project site. Bewas River is flowing at a distance of 3.9Km in ESE direction and Bankrai Nadi is flowing at a distance of 5.4Km in WNW direction.

Ambient air quality monitoring was carried out at 8 locations during October 2019 to December 2019 and the baseline data indicates the ranges of concentrations as: PM₁₀ (50.1 µg/m³-78.3µg/m³), PM_{2.5} (23.1 µg/m³ - 45.6 µg/m³), SO₂ (5.2 µg/m³-7.6 µg/m³) and NO₂ (14.9µg/m³-21.2µg/m³). AAQ modelling study for point source emissions indicates that the maximum incremental GLCs after the proposed project would be 7.7µg/m³, 12.6 µg/m³ and 9.75µg/m³ with respect to PM₁₀, SO_x and NO_x. The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).

Total water requirement is 4,951 m³/day out of which fresh water requirement of 3,403 m³/day will be met from ground Water (660m³) and surface water (3,280m³). Effluent of 312 KLD quantity will be treated through ETP capacity of 350KLD followed by RO and MEE. The plant will be based on Zero Liquid discharge system.

Power requirement after expansion will be 9250 KW including existing 1200 KW and will be met from Madhya Pradesh State Electricity Board (MPSEB). Existing unit has (1No.) DG sets of 875 kVA capacity is used as standby during power failure, additionally 1No. DG sets (1000kVA) will be installed. Stack (height 30.0m) will be provided as per CPCB norms to the proposed DG sets. Existing unit has no boiler. Waste Heat Recovery Boiler of 30TPH based on steam generation will be installed.

Details of Process emissions generation and its management:

	Major air emissions from the existing & proposed expansion project are of PM, SO₂, NO_x and Acid Mist	Mitigation/Management
Air Emissions	Single super phosphate plant (Existing) <ul style="list-style-type: none"> Emission of fluoride compounds from acidulation of rock phosphate Dust emission from rock grinding and handling section During curing of the product, dust and fluoride compounds releases 	<ul style="list-style-type: none"> Four Stage Scrubbing system with 3 Stage water Scrubber & Alkali scrubber Bag Filter at Ball Mill is provided. Stack with 50m height is provided
	Beneficiation of Rock Phosphate (Existing) <ul style="list-style-type: none"> Particulate matter (PM) in the form of fine rock dust from dryers, calciners and grinders. 	<ul style="list-style-type: none"> Multicyclone and Dust collector is provided at grinding unit and packing plant. Material handling will be closed pneumatic or conveyer bucket

		<p>systems.</p> <ul style="list-style-type: none"> • Stack with 40m height is provided
Granular SSP plant (Existing)	<ul style="list-style-type: none"> • Particulate Matter emission from granular unit 	<ul style="list-style-type: none"> • Stack with 40m height will be attached to process stack • Multicyclone Cyclone dust collector is provided.
TSP (Existing – Production not started)	<ul style="list-style-type: none"> • Dust and particulate emission from crushing, grinding and screening of rock phosphate and particulate emission from Granulation • HF Emission during two stage reaction. 	<ul style="list-style-type: none"> • Dust collector is provided. • Material handling will be closed pneumatic or conveyer bucket systems. • HF scrubber provided for fluorine recovery (3 stage wet scrubber for Florine recovery)
Ammonia Plant (Proposed)	<ul style="list-style-type: none"> • Flue gas containing mainly SO₂, NH₃ and NO_x from primary reformer stack 	<ul style="list-style-type: none"> • Ammonia Purification System (Wet Scrubber) for NH₃ • Desulphurization Wet Scrubber • Stack with 50m height will be attached to Primary Reformer
Sulphuric acid Plant (Proposed)	<ul style="list-style-type: none"> • Gases containing acid mist and SO₂ from the absorption tower stack 	<ul style="list-style-type: none"> • Scrubber and Online SO₂ emission monitoring system • Stack with 50m height will be attached to Absorption Tower • Emission level after APCD : SO₂: 950 (mg/Nm³); • Acid Mist / Sulphur Trioxide : 50 (mg/Nm³); • SO₂ Emission limit < 1.5 kg/Tonne of acid produced as per CPCB norms
Phosphoric acid Plant(Proposed)	<ul style="list-style-type: none"> • Dust from rock handling and grinding section • Fluoride compounds emitted from fume scrubbers 	<ul style="list-style-type: none"> • Bag Filter will be provided at Ball mill • 3 stage wet scrubber for Florine absorption • Stack with 20m height is attached to Rock grinding section and Stack with 40m height is attached to Gas Scrubber
Nitric Acid Plant (Proposed)	<ul style="list-style-type: none"> • NO_x bearing gas emitted from absorption tower stack 	<ul style="list-style-type: none"> • Absorption Tower Stack for tail gas treatment • Stack with 50m height will be provided.

DAP Plant/NPK (Proposed)	<ul style="list-style-type: none"> • NH₃ and small quantity of fluoride compounds from neutralization and granulation operation • Dust emission from drying, screening and cooling section • Coal fire furnace- PM, NO_x, SO_x 	<ul style="list-style-type: none"> • Stack with 50m height is attached to Ammonia Scrubber • Stack with 50m height is attached to HF gas scrubber • Stack - 30m height with Multi cyclone separator
Zinc Sulphate (Proposed)	<ul style="list-style-type: none"> • Particulate matter generation 	<ul style="list-style-type: none"> • Stack with 30m height with Multi cyclone separator will be provided
Gypsum Granular Plant (Proposed)	<ul style="list-style-type: none"> • PM, NO_x, Sox will generate from coal fire furnace 	<ul style="list-style-type: none"> • Stack with 30m height with Multi cyclone separator will be provided
Vinyl Sulphone (Proposed)	<ul style="list-style-type: none"> • SO_x from Sulphonation process • Acid Mist from Reduction process 	<ul style="list-style-type: none"> • 3 Stage scrubbers • 3 Stage scrubbers for Acid Mist
Steam and Power Generation	<ul style="list-style-type: none"> • Flue gas discharged through the boiler house stack; may contain particulate matter, NO_x, SO₂, etc., depending up on the fuel used like coal, NG, F.O/naphtha, etc. • PM, SO_x, and NO_x will be generated from DG set 	<ul style="list-style-type: none"> • Multi cyclone followed by Adequate Stack with 50m height is proposed. • Adequate Stack height 30m is available with DG set of 875kVA and another 30m stack will be provided with DG set of 1000kVA

Details of Solid waste/ Hazardous waste generation and its management:

Type of waste	Hazardous waste Quantity			Treatment Disposal
	Existing	Proposed	Total	
Used Oil Category 5.1	278 Litre	500 Litre	778 Litre	Stored in drums and reuse for lubricating the open chain/ gear /roller etc.
Silica	119 MT	None	119 MT	Recycle in SSP manufacturing as filler.
H ₂ SiF ₆	6466 MT (liquor)	None	6466 MT (liquor)	Recycle in SSP manufacturing for acid dilution purpose.
Zinc Sludge from Zinc Sulphate	None	300MTPA	300MTPA	It will be reuse in SSP.

Sludge (Schedule I category 26.2) from DAP/NPK, Ammonia and Nitric Acid Plant	None	50MTPA	50MTPA	It will reuse in SSP
Sludge (Schedule I category 26.2) from VS	None	50MTPA	50MTPA	Stored and disposed through registered recycler only.
MEE Salt (Schedule I category 26.1) from VS	None	50MTPA	50MTPA	Stored and disposed through registered recycler only.
Sludge (Schedule I category 34.3) from SAP	None	200MTPA	200MTPA	It will reuse in SSP
Vanadium Pentoxide Catalyst Waste (Schedule 1 Category 18.1) from SAP	None	2 MTPA	2 MTPA	Stored and disposed through registered recycler only..
Sludge (Schedule I category 34.3) from SAP	None	200MTPA	200MTPA	It will reuse in SSP
ETP Sludge (Schedule 1 Category 35.3)	None	3300 MTPA	3300 MTPA	Sent to TSDF

Deliberations in the EAC:

The EAC, constituted under the provision of the EIA Notification, 2006 and comprising of Experts Members/domain experts in various fields, have examined the proposal submitted by the Project Proponent in desired form along with EIA/EMP report prepared and submitted by the Consultant accredited by the QCI/ NABET on behalf of the Project Proponent.

The EAC noted that the Project Proponent has given undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environmental concerns and the projected scenario for all the

environmental components. The Committee has found the baseline data and incremental GLC due to the proposed project within NAAQ standards. The Committee has also deliberated on the activities/public hearing action plan and found to be addressing the issues in the study area and public hearing concerns. The Committee has suggested that the storage of toxic/explosive raw material shall be bare minimum in quantity and inventory. The Committee discussed the impact of fertilizers/heavy metals on the soil characteristics and associated food chain. The Committee was of the view that the project proponent shall undertake such studies and shall explore the possibilities of green fertilizers/organic fertilizers. The Committee also suggested that based on the water audit, the project proponent shall achieve at least 20 % reduction in fresh water requirement. The project proponent has submitted an affidavit stating that they shall achieve 20% reduction in fresh water requirement within two years.

The EAC has also deliberated the certified compliance report of IRO MoEFCC and found in order. The Committee noted that the proposal was earlier considered by the EAC in its meeting held during February 22-23, 2021 wherein the EAC deferred the proposal. PP submitted the revised reports and after detailed deliberations, the EAC found to be addressing the issues.

The EAC deliberated the proposal and has made due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC have found the proposal in order and have recommended for grant of environmental clearance.

The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

The EAC, after detailed deliberations, **recommended** the project for grant of environmental clearance, subject to compliance of terms and conditions as under, and general terms of conditions at **Annexure:-**

- (i). The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.
- (ii). As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises. Treated effluent shall be reused in the process/utilities. Treated Industrial effluent shall not be used for gardening/greenbelt development/horticulture.

- (iii). 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.
- (iv). The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
- (v). Occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
- (vi). Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.
- (vii). 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.
- (viii). Safety and risk assessment studies shall be conducted and action plan and mitigation measures shall be properly implemented.
- (ix). Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (x). Volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.99% with effective chillers/modern technology.
- (xi). Total fresh water requirement shall not exceed 3,403 cum/day proposed to be met from ground water/surface water. Necessary permission in this regard shall be obtained from the concerned regulatory authority/CGWA, and renewed from time to time.
- (xii). The project proponent has submitted an affidavit stating that they shall achieve 20% reduction in fresh water requirement within two years, based on the study. The implementation report shall be submitted to the IRO, MoEFCC.

- (xiii). Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.
- (xiv). 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.
- (ii). The green belt of at least 5-10 m width shall be developed in atleast 33% of the total project area, mainly along the plant periphery. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map. Trees have to be planted with spacing of 2m x 2m and number of trees have to be increased accordingly. The plant species can be selected that will give better carbon sequestration. All trees must be planted within first year.
- (xv). The activities and the action plan proposed by the project proponent to address the socio-economic/public hearing issues in the study area, shall be completed as per the schedule presented before the Committee and as described in the EMP report in letter and spirit.
- (xvi). A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

Agenda No. 8.3

Expansion of Pesticide Products (from 2395MT/ Month to 2730 MT/Month) in existing unit plot NO.1,2,15 & 16, Opp. State Bank of India, G.I.D.C. Industrial Estate, Nandesari, Dist.- Vadodara, Gujarat by M/s GSP Crop Science Pvt Ltd- Consideration of Environmental Clearance

[IA/GJ/IND3/201034/2018, J-11011/403/2012-IA II (I)]

The Project Proponent and the accredited Consultant M/s Aqua-Air Environmental Engineers Pvt. Ltd. made a detailed presentation on the salient features of the project and informed that:

The proposal is for environmental clearance to the project for Expansion of Pesticide Products (from 2395 MT/ Month to 2730 MT/Month) at Plot No. 1, 2, 15 & 16, Opp. State Bank of India,

G.I.D.C. Industrial Estate, Nandesari, District Vadodara, Gujarat by M/s GSP Crop Science Pvt Ltd.

The details of products and capacity as under:

Sr. No.	Name of Product	CAS No.	Capacity (MT/ Month)			LD ₅₀ (mg/kg)
			Existing	Additional	Total after Proposed Expansion	
1	Chlorpyrifos	2921-88-2	125	500	500	1000
2	Thiomethoxozim	5188-07-8	20			116
3	Clothianidin Technical	210880-92-5	00			523
4	Tolfenpyrad Technical	129558-76-5	00			260
5	Difenthiuron Technical	80060-09-9	50			2068
6	Profenophos Technical	41198-08-7	50			298
7	Pymetrozine Technical	123312-89-0	00			5693
8	Methoxyfenozide Technical	161050-58-4	00			2000
9	Lambda Cyhalothrine Technical	68085-85-8	00			3920
10	Bifenthrin Technical	82657-04-3	05			210
11	Metribuzin Technical	21087-64-9	50	325	325	245
12	Pendimethaline	40487-42-1	125			1050
13	Propanil	709-98-8	40			360
14	Pyrazosulfuron Ethyl Technical	93697-74-6	00			2000
15	Hexaconazole	79983-71-4	20	65	65	612
16	Azoxystrobin	131860-33-8	20			250
17	Cyproconazole	94361-06-5	20			350
18	Thifluzamide	130000-40-7	00			260
19	Trifloxystrobin	141517-21-7	00			>2000

20	Pyraclastrobin	175013-18-0	00			200
21	Tebuconazole	107534-96-3	00			625
22	Difenconazole	119446-68-3	00			1453
23	Propiconazole	60207-90-1	00			1490
24	Prothioconazole	178928-70-6	00			2235
25	Mepiquate Chloride 50%	24307-26-4	00	40	40	464
26	Paclobutrazole	76738-62-0	00			490
27	Fipronil	120068-37-3	10	-10	00	354
28	Tricyclazole	41814-78-2	25	-25	00	250
29	Fenpyroximate	134098-61-6	5	-5	00	245
30	Triazophos	24017-47-8	25	-25	00	500
31	Carboxin	5234-68-4	5	-5	00	430
Plasticizers						
1	Di Ethyl Phthalate	84-66-2				8600
2	Di Methyl Phthalate	131-11-3				2860
3	Tri Ethyl Citrate	77-93-0	1800	00	1800	5900
4	Di Octyl Phthalate	117-81-7				4900
5	Di Octyl Adipate	123-79-5				9100
Total			2395	335	2730	
			MT/Month	MT/Month	MT/Month	

The project/activities are covered under category 'A' of item 5(b) 'Pesticides industry and pesticide specific intermediates' of the Schedule to the Environment Impact Assessment Notification, 2006, and requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

The Standard ToR has been issued by Ministry vide letter No. J-11011/403/2012 -IA II (I); dated 4th February 2019. Public hearing is exempted as the unit is located in the notified Industrial area. There is no litigation pending against the proposal.

The Ministry had issued ECs earlier vide letter dated 10th February, 2009 and 8th May, 2015 to the existing project of New Pesticide Technical Manufacturing unit in favour of M/s. GSP Crop Science Pvt. Ltd. Certified EC Compliance Report from MoEFCC, Bhopal vide file no. 5-44/2015/(Env)036 dated 15th February, 2021. PP reported that the Action plan for partly complied, not complied conditions has been submitted to MoEFCC, Bhopal dated 20th March, 2021.

Existing land area is 48,021 m², additional no land will be used for proposed expansion. Industry will develop Greenbelt in an area of 33.0% i.e., 15847 m² out of 48,021 m² total area of the project. The estimated project cost is Rs. 179.0 Crores including existing investment of Rs. 159.0 Crores. Total capital cost earmarked towards environmental pollution control measures is Rs. 5.0 Crores and the Recurring cost (operation and maintenance) will be about Rs. 3.0 Crores per annum. Total Employment will be 268 persons as direct 50 persons indirect after expansion. Industry proposes to allocate 1.0% of the additional project cost towards Corporate Environment Responsibility.

There are No national parks, wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. lies within 10 km distance from the project site. Mahi river is flowing at distance of 2.06 Km in West direction.

Ambient air quality monitoring was carried out at 10 locations during October, 2020 to December, 2020 and the baseline data indicates the ranges of concentrations as: PM10 (76.35 – 68.51 µg/m³), PM2.5 (44.89 – 40.21 µg/m³), SO₂ (17.55 – 10.14 µg/m³) and NO₂ (16.89 – 8.75 µg/m³) respectively. AAQ modelling study for point source emissions indicates that the maximum incremental GLCs after the proposed project would be 0.01 µg/m³, 0.03 µg/m³ and 0.01 µg/m³ with respect to PM10, SO_x and NO_x. The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).

Total water requirement is 1180 m³/day of which fresh water requirement of 1180 m³/day and will be met from Nandesari Water & Utilities Ltd. Water Supply. Effluent of 740 m³/day quantity will be treated through MEE and ETP facilities and then effluent will be sent to CETP for further treatment.

- Total waste water generation will be 740 m³/Day (Industrial: 700 m³/Day + Domestic: 40 m³/Day).
- Total 700 m³/day of industrial effluent shall be generated, out of which 240 m³/day shall be treated in-house MEE and then 200 m³/day MEE condensate water + 450 m³/day (Process: 360 m³/day + Washing: 40 m³/day + Utility: 50 m³/day), = total 650 m³/day effluent will be treated in ETP and then sent to CETP for further treatment.
- 40 m³/Day Domestic Effluent generated shall be treated in effluent treatment plant and then send to discharge into CETP for further treatment.
- Total 690 m³/Day (Industrial: 650 m³/Day + Domestic: 40 m³/Day) wastewater shall be treated in effluent treatment plant and then discharge into CETP for further treatment. So, the plant will not Zero Liquid discharge system.

Power requirement after expansion will be 4 MW and will be met from Madhya Gujarat Vij Company Limited (MGVCL). Existing unit has 2 Nos. DG sets of 500 KVA & 600 KVA capacity, additionally no DG sets are used as standby during power failure. Stack (height 9 m) will be provided as per CPCB norms to the proposed DG sets.

Existing unit has 1 Nos. of 8.0 TPH Boiler, 1 Nos. of 10.0 TPH Boiler, 2 Nos. DG set of 500 KVA & 600 KVA. additionally, 1 Nos. of 10.0 TPH Boiler and 1 No. of Thermic Fluid Heater (10 Lac Kcal/Hr) will be installed. Existing Multi cyclone separator & bag filter, Cyclone Separator with ESP & Adequate Stack Height with a stack of height of 36 m, 36 m & 9 m and additionally, ESP & Ventury Scrubber with a stack of height of 36 m & 30 m will be installed for controlling the particulate emissions within the statutory limit of 150 mg/Nm³ for the proposed boilers.

Details of Process emissions generation and its management.

1) Flue Gas Stack

Sr. No.	Stacks Attached To	Height From Ground Level (M)	Fuel	Consumption Of Fuel	Diameter (M)	Expected Pollutants	APCM
EXISTING							
1	Boiler-1 (8 TPH)	36	Coal	850 kg/ hour	0.8	PM: 150* mg/Nm ³ SO ₂ : 262* mg/Nm ³ NO _x : 94* mg/Nm ³	Multi Cyclone Separator & Bag Filter
2	Boiler-2 (10 TPH)	36	Coal	850 kg/ hour	0.8		Cyclone Separator with ESP
3	D.G. Set (600 KVA)	9	HSD	2 KL/ hour	0.1		Adequate Stack Height
4	D.G. Set (500 KVA)						
PROPOSED							
5	Boiler-3 (10 TPH)	36	Coal	850 kg/ hour	0.8	PM: 150* mg/Nm ³ SO ₂ : 262* mg/Nm ³ NO _x : 94* mg/Nm ³	ESP
6	Thermic Fluid Heater (10 Lac Kcal/ Hr)	30	F.O./ L.D.O.	10 KL/ hour	0.75		Ventury Scrubber

Process Stack

Sr. No.	Stack Attached To	Stack Height	Air Pollution Control System	Parameter	Permissible Limit
Existing					
1	Chlorpyrifos	15 m	Two Stage Water Scrubber	HCl	20 mg/Nm ³
2	Profenophos	15 m	Two Stage Water Scrubber	HBr	5 mg/Nm ³

3	Hexaconazole	15 m	Two Stage Scrubber	Alkali	SO ₂	40 mg/Nm ³
4	Thiomethoxozim	15 m	Two Stage Scrubber	Water	HCl	20 mg/Nm ³
5	Diafenthuron	15 m	Two Stage Scrubber	Alkali	NH ₃	175 mg/Nm ³
Proposed						
6	Finpronil	15 m	Two Stage Scrubber	Water	HBr	5 mg/Nm ³
7	Glyphosate	15 m	Two Stage Scrubber	Water	HCl	20 mg/Nm ³

Details of Solid waste/ Hazardous waste generation and its management. 13 Categories of Hazardous/Solid Wastes shall be generated from this Unit.

Total Proposed

Used Oil (Existing) @ 1.42 KL/Month & (Total Proposed) @ 2.84 KL/Month shall be Collected, Stored, Transported and Disposal by selling to registered refiners. Discarded liners/Bags Carboy Drums (Existing) @ 1559.0 MT/Annum & (Total Proposed) @ 3118.0 shall be Collection, Storage, Decontamination, Transportation, Disposal by selling to authorized recycler. Residue containing Toxic metals/organic /Process waste (Existing) @ 20.0 MT/Annum & (Total Proposed) @ 45.0 MT/Annum shall be Collection, Storage, Transportation and Disposal at CHWIF, NECL, Nandesari. ETP Sludge (Existing) @ 300.45 MT/Annum & (Total Proposed) @ 360.45 MT/Annum shall be Collected, Stored, Transported and Disposal at TSDF site of NECL Nandesari. Salt from MEE (Existing) @ 67.5 MT/Annum & (Total Proposed) @ 217.5 MT/Annum shall be Collected, Stored, Transported and Disposal at TSDF site of NECL Nandesari. Distillation Residue (Existing) @ 20.0 MT/Annum & (Total Proposed) @ 50.0 MT/Annum shall be Collection, Storage, Transportation and Disposal at Common Incineration Site at M/s. NECL, Nandesari or sell to Cement Industry. Spent Catalyst (Existing) @ 4.7 MT/Annum & (Total Proposed) @ 10.0 MT/Annum shall be Collection, Storage, Transportation and Disposal at Common Incineration Site at M/s. NECL, Nandesari or sell to suppliers. Spent HCl (30%) (Existing) @ 34.0 MT/Annum & (Total Proposed) @ 68.0 MT/Annum shall be Collection, Storage, Transportation & Sell to end user. HBr (Existing) @ 20.0 MT/Annum & (Total Proposed) @ 40.0 MT/Annum shall be Collection, Storage, Transportation & Sell to end user. Liquid Ammonia (Existing) @ 14.0 MT/Annum & (Total Proposed) @ 28.0 MT/Annum shall be Collection, Storage, Transportation & Sell to end user. NaBr (Existing) @ 34.4 MT/Annum & (Total Proposed) @ 38.8 MT/Annum shall be Collection, Storage, Transportation & Sell to end user. Spent Sulphuric Acid (45%) (Existing) @ 187.5 MT/Annum & (Total Proposed) @ 375.0 MT/Annum shall be Collection, Storage, Transportation & Sell to end user. Spent Carbon (Existing) @ 5.5 MT/Annum & (Total Proposed) @ 5.5 MT/Annum shall be Collection, Storage, Transportation and Disposal at authorized CHWIF facility or co-processing facility.

Deliberations in the EAC:

The EAC made detailed deliberation on the proposal. The EAC was informed that the project proponent obtained EC during 2009 and 2015 for existing pesticide production. The Committee was of the view that existing EC conditions shall be complied first by the project proponent before considering the application for expansion. **The Committee noted that the PP is habitual in non-compliance and even after 12 year of granting EC, the PP is unable to comply with environmental conditions and even not undertaken the greenbelt development as per granted ECs.**

The Committee noted that the consultant has not properly guided the PP or reluctance of PP for compliance of EC conditions regarding the EIA provisions and submitted incomplete EIA/EMP report and even without complying existing EC conditions. The Committee also noted that the PP/consultant has not provided adequate reply/documents during presentation. The project proponent/consultant were least bothered about the environment, and has not taken any initiatives for recycling of water, reduction in fresh water, rain water harvesting etc. The Committee has also showed its displeasure on the technical quality of the EIA/EMP report and incomplete application submitted by the PP/Consultant and recommended that Show Cause Notice shall be issued to the PP/Consultant, and the PP/Consultant shall make a detailed explanation before the Committee in the next presentation.

*The Committee has also deliberated on **various technical and environmental data deficiencies** in the proposal and desired for following requisite information/input, as under:*

- (i) The Committee noted that the PP is habitual in non-compliance and even after 12 year of granting EC, the PP is unable to comply with environmental conditions and even not undertaken the greenbelt development. The existing environmental clearance shall be complied first. Compliance status of the existing EC conditions/ Action Taken Report on the non-complied points shall be forwarded by the Ministry's Regional Office, after conducting fresh site visit.
- (ii) The company shall ensure development of green belt of at least 5-10 m width in nearly 33% of the total project area, mainly along the plant periphery. Plan for additional plantation in the adjacent area, if any, shall be submitted. Trees have to be planted with spacing of 2m x 2m and number of trees have to be increased accordingly.
- (iii) Project proponent/Consultant shall revise the complete EIA/EMP Report providing all the requisite information as per the Appendix III of the EIA Notification, 2006.
- (iv) Commitment that no banned pesticides are in the production plan and no banned pesticides/chemicals shall be utilized manufactured in the unit.
- (v) Details of Raw material and its linkage and its mitigation measure during transportation needs to be submitted.

- (vi) Detailed stack monitoring data. The data submitted is not matching with the ground realities.
- (vii) Considering the critical air quality of the region, cleaner fuels shall be used as fuel in the boiler or coal/imported coal with low ash content (with Sulphur <0.5%) shall only be used.
- (viii) One-month additional baseline data to be collected to validate the existing data. AAQ data available on CPCB/GPCB monitoring stations shall also be compared and submitted.
- (ix) Detailed process flow diagram.
- (x) Revised water balance with reduction in fresh water requirement and recycling of water. The project proponent shall achieve 50% reduction in fresh water quantity with effective recycling plan.
- (xi) Effluent management plan with commitment from CETP, if so.

The EAC expressed its concern on the quality of the EIA/EMP prepared by M/s Aqua-Air Environmental Engineers Pvt Ltd, and their extremely poor technical presentation before the Committee and flimsy justification. The Committee is of the view that Consultant shall guide the project proponent on the environmental aspects and provisions of the EIA Notification, which is not been seen in the present case. The PP/Consultant shall ensure compliance of existing EC conditions/ToR before submission of the final EIA/EMP report. The Committee was of the view that the Consultant should guide properly to the PP and improve the preparation of reports.

*The proposal was accordingly **returned in present form** for submission of revised and updated reports as per provisions of the EIA Notification, 2006 for further consideration of the EAC.*

Reconsideration in Environmental Clearance

Agenda No. 8.4

Proposed Pigment Manufacturing @230 MT/M, located at Plot No. 55, GIDC, Nandesari, Ta -& District-Vadodara, Gujarat by M/s Sapphire Pigments Industries-Reconsideration of Environmental Clearance

[IA/GJ/IND3/181096/2018, IA-J-11011/323/2020-IA-II(I)]

The proposal was earlier considered by the EAC (Industry 3) in its meeting held on 1-2 February, 2021. The requisite details sought by the EAC and information provided by the PP is as under:

S. No.	ADS by the EAC	Information provided by the PP
1	<p>The Committee was of the view that operational status of the existing unit/compliance status of the CTO conditions shall be submitted through SPCB for appraisal of the project as per the Standard ToR condition granted to project. In this context, Operation status of the existing unit/Compliance status of existing CTO conditions forwarded by the SPCB needs to be submitted as per the Standard ToR granted to the project.</p>	<p>Sapphire Pigments Industries was granted the CTE/NOC for blending/mixing/pulverizing vide GPCB (Gujarat Pollution Control Board) Consent Order No. 179629 dated 30-12-2020.</p> <p>PP has also presented the Inspection report conducted by SPCB.</p> <p>The unit is completely non-operational. Letter received from the “Nandesari Industries Association – Common Effluent Treatment Plant” (NIA-CETP) that they received zero effluent from the PP in the past year, is submitted.</p> <p>The Committee deliberated the status and found in order.</p>
2	<p>One-month additional base line data needs to be submitted. The project site is located in the CPA, however, the baseline values are very well within the NAAQ limits. Data shall be revalidated and justification shall be provided for the submitted data values.</p>	<p>M/s Bhagwati Enviro Care Pvt. Ltd has carried out one-month additional base line monitoring for the period of 10th February 2021 to 08th March 2021. The AAQ results are within the prescribed norms. Earlier, baseline monitoring in month of January-February-March 2019 was carried out. Base line values are very well within the NAAQ limits. Recent monitoring data of Nandesari GIDC has been collected from CPCB Website & from Nandesari Industrials Association. Present data are also within permissible norms. The Committee deliberated the issues.</p>
3	<p>The EAC has showed its strong disagreement on the poor quality of the EIA/EMP prepared by M/s Bhagwati Enviro Care Pvt Ltd, and their flimsy technical presentation before the Committee. The Committee was of the view that the Consultant shall improve their technical & scientific quality and skills, otherwise Committee shall be</p>	<p>It was assured that the consultant shall improve technical & scientific skills. The Ministry has issued the show cause notice to Consultant on 09.03.2021. The reply of show cause notice is awaited from PP. The Ministry may take necessary action after submission of reply from Consultant.</p>

	forced not to consider their case and may lead to debar from future presentation.	
4	Action plan for controlling the fugitive emissions from the unit considering the unit proposed in the CPA.	<p>Fugitive emission could occur from the storage yard of raw materials and finished products. The storage quantity is low since only 6 days inventory will be maintained at site and proper handling methods will be adopted. Emissions from transport of vehicles would occur to a certain extent. The emissions from traffic movements will be controlled by proper planning of the transport of raw materials and finished products to and fro from the factory premises. All the roads inside the plant will be concreted to reduce any dust emissions.</p> <p>Proper planning and maintenance will control the extent of fugitive emissions. During the production, the industry will carry out regular monitoring of fugitive emissions as per the factories Act. The Committee deliberated the issues.</p>
5	Details of Raw material and its linkage and its mitigation measure during transportation needs to be submitted	Detailed list of raw materials and its linkage and mitigation measures during transportation has been submitted and presented before the Committee.
6	Revised layout with detailed greenbelt plan.	Revised Layout Plan with detailed greenbelt plan has been submitted. The total plot area is 2800 Sq. M. The unit is located in CEPI area so as per MoEFF&CC circular/Guidelines for CEPI area, PP have to develop 40 % of our project (Land) area as a greenbelt. The total plot area is 2800 sq. m for that PP will develop 560 sq. m in the premises and 560 sq. m. outside premises but inside the Industrial Estate, Nandesari only. So, total greenbelt development area will be 1120 sq. m., Which is 40% of our project (land) area. For developing greenbelt area of 560 sq.m in GIDC area, M/s. Nandesari Industries

		Association has issued permission letter. The Committee deliberated the issues.
7	Detailed process flow diagram.	Detailed process flow diagram has been submitted and presented before the EAC. The Committee deliberated the issue.
8	Commitment for not using coal as fuel, considering the CPA and incremental GLCs.	PP had removed coal as a fuel & assure that PP will use Agro Briquettes as a fuel till PNG connection is obtained from Adani Gas Limited. Presently, Adani Gas Limited cannot supply PNG connection. The Committee deliberated the issues.

The project proponent and the accredited consultant M/s Bhagwati Enviro Care Pvt Ltd made a detailed presentation on the salient features of the project and informed that:

The proposal is for environmental clearance to the project for manufacturing Synthetic Organic Chemical (Pigments) at Plot No.:55, GIDC Estate, Nandesari, Taluka & District Vadodara (Gujarat) by M/s Sapphire Pigments Industries.

The details of products and capacity as under:

S. No.	Products	CAS No.	Quantity (TPM)
1.	CPC Blue	147-14-8	80
2.	Pigment Green 7	1328-53-6	50
3.	Pigment Beta Blue	147-14-8	50
4.	Pigment Alpha Blue	147-14-8	50
Total			230

The project/activities are covered under category B of item 5(f) 'Synthetic organic chemicals industry' of the Schedule to the Environment Impact Assessment Notification, 2006. Due to applicability of general condition (located within 5 km of CPA), the project requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

The ToR for the project has been issued by SEIAA, Gujarat vide letter No. SEIAA/GUJ/TOR/5(f)/106/2019; dated 10th January 2019. Public hearing is exempted as the project site is located in Notified Industrial Area of GIDC Nandesari, Gujarat. No litigation is pending against the proposal.

Total land area is 2800 m² will be used for proposed project. Industry will develop greenbelt in an area of 40 % i.e. 1120m². Out of 2800 m² total area of the project, 560 m² (20 % of total plot area) will be developed in the premises and remaining 560 m² (20 % of total plot area) will be developed in Nandesari GIDC. The estimated project cost is Rs 7.5 Cr. Total capital cost

earmarked towards environmental pollution control measures is Rs 126.5 Lacs and the recurring cost (operation and maintenance) will be about Rs 81.5 Lacs Per annum. Total employment will be 30 persons as direct & 25 Persons indirect. Industry proposes to allocate Rs 30 Lacs towards Corporate Environmental Responsibility.

There are no National parks, wildlife sanctuaries, biosphere reserves, tiger/elephant reserves, wildlife corridors etc. within 10km distance from the project site. River Mahi is flowing at a distance of 2.22 km in West direction and River Mani is flowing at a distance of 1.218 km in East direction.

Ambient air quality monitoring was carried out at 8 locations during January-February-March 2019 and one month additional base line monitoring for the period of 10th February 2021 to 08th March 2021 and the baseline data indicates the ranges of concentration as: PM10 (67.32 to 88.72 µg /m³), PM2.5 (29.98 to 45.21 µg /m³), SO2 (9.42 to 42.02 µg/m³), NO₂ (12.99 to 49.92 µg/m³), HCl (<1 to 2.9 µg/m³), Cl₂ (<1 to 1.8 µg/m³) & NH₃ (<1 to 2.8 µg/m³). AAQ modeling study for point source emission indicated that the maximum incremental GLCs after the proposed project would be 0.58 ug/m³, 0.19 ug/m³, 0.41 ug/m³, 0.22 ug/m³, 0.03 ug/m³ and 0.037 ug/m³, 0.005 ug/m³ with respect to PM10, PM2.5, SO_x, NO_x, HCl, Cl₂ and NH₃. The resultant concentrations are within the national ambient air quality standards (NAAQS).

Total fresh water requirement of 98.33 m³ /day will be met from GIDC water Supply. Effluent of 78.05 KLPD; which will be treated in Primary, Secondary & tertiary Treatment plant and then after discharged to CETP of Nandesari Industries Association by pipeline system (CETP booking Qty.: 153 KLPD).

Power requirement for the proposed project will be 150 KVA and will be met from Madhya Gujarat Vij Co. Ltd. One DG set capacity of 125 KVA, will be used for proposed project as standby during power failure. Stack (height 11 m) will be provided as per CPCB norms the proposed DG set.

Unit will install 2 TPH Steam Boiler – Coal / Agro waste fired with a stack height of 30m, 4.0 Lac k cal/hr Thermic Fluid Heater – Coal / Agro waste with a stack height of 30m. Multi Cyclone dust collector, Bag filter and wet scrubber will be installed attached to Boiler and Thermic Fluid Heater separately for controlling the particulate emission within the statutory limit of 115 mg/Nm³ for each utility.

S. No.	Stack attached To	Stack Height In Meter	Type of Fuel	Quantity of Fuel	Type Of emission i.e Air Pollutant	APC System
1	Steam Boiler (Capacity: 2 MT)	30	Coal / Agro Briquette	4 MT/Day	SPM SO ₂ NO _x	Multi Cyclone Dust collector and Bag Filter

						and Wet Scrubber
2	Thermic Fluid Heater – 1 (4 lacs Kcal)	30	Coal / Agro Briquette	3 MT/Day	SPM SO ₂ NO _x	Multi Cyclone Dust collector and Bag Filter and Wet Scrubber
3	DG Set	11	Diesel	20 Litre/hr.	SPM SO ₂ NO _x	Adequate Stack Height

Emission generation from process- Process Emission: Cl₂, HCl, NH₃, SPM will be emitted during process. Two stage water scrubbers will be provided for NH₃ gas, water scrubber followed by alkali scrubber will be provided for HCl, Cl₂. Cyclone separator followed by bag filter will be provided with Spin flash dryer The details of process gas and air Pollution Control System, and details of solid waste/ hazardous waste generation and its management are shown in tables below:

S. no.	Source of emission	Type of emission	Stack/Vent Height (m)	Air Pollution Control Measures
1	Reaction vessel	NH ₃	11 m	Two Stage water Scrubber
2	Reaction vessel	HCl Cl ₂	11 m	Water Scrubber Followed by Alkali Scrubber
3	Spin Flash Dryer	SPM	11 m	Cyclone Separator followed by bag filter

Sr. No	Type of Hazardous Waste	Source	Cat. No.	Quantity (per annum)	Management
1	ETP Sludge	Effluent Treatment plant	35.3	100	Collection, Storage, Transportation, Disposal to TSDF site
2	Discarded Bags / Containers / Drums	Raw Material Storage	33.1	20	Used for packing of ETP waste or return back to raw material supplier.
3	Used Oil	Plant Machinery	5.1	0.020	Storage into carboys and ultimately sell to registered re refiners

4	Spent Acid	CPC Blue & CPC Alpha Blue	26.3	5736	Collection, Storage, total spent acid generation will be 5736 KL/Year (From Alpha Blue and CPC Blue product) from which @ 1920 Reuse in CPC Blue Production and remaining @ 3816 sell to end user having rule 9 permission.
5	Ammonium Carbamate	CPC Blue	Sch. 2 Class C1	1363	Collection, Storage, Transportation and sold to authorized industries having rule 9 permission.
6	Dilute HCl	Pigment Green 7	----	247	Collection, Storage, Transportation and sold to authorized industries having rule 9 permission.
7	Sodium Hypo chloride	Pigment Green 7	----	1685	Collection, Storage, Transportation and sold to authorized industries having rule 9 permission.
8	Aluminium Chloride	Pigment Green 7	----	2820	Collection, Storage, Transportation and sold to authorized industries having rule 9 permission.

Deliberations in the EAC:

The EAC, constituted under the provision of the EIA Notification, 2006 and comprising of Experts Members/domain experts in various fields, examined the proposal submitted by the Project Proponent in desired form along with EIA/EMP report prepared and submitted by the Consultant accredited by the QCI/ NABET on behalf of the Project Proponent.

The EAC noted that the Project Proponent has given an undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environmental concerns and the projected scenario for all the environmental components. The Committee found the baseline data and incremental GLC due to the proposed project within NAAQ standards. The Committee also deliberated on the activities/action plan and found to be addressing the issues in the study area. The Committee

suggested that the storage of toxic/explosive raw material shall be bare minimum in quantity and inventory. The Committee noted that the project proponent committed before the Committee that Coal shall not be used as fuel, instead shall go for cleaner fuels. Action plan for control and management of pollution in the CPA is discussed and found to be satisfactory. The Committee noted that the present formulation/blending unit is not in operation and the undertaking submitted by the project proponent can be taken on record. The Committee noted that, though, the effluent quantity proposed to be discharged to CETP for further treatment and disposal is less, the PP shall explore the possibility of recycling and utilization of treated water in the unit. The Committee suggested the PP to start the greenbelt development immediately. The Committee found the additional information submitted by the project proponent to be satisfactory and addressing to the concerns of the Committee.

The EAC deliberated on the proposal with due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC found the proposal in order and have recommended for grant of environmental clearance.

The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

The EAC, after detailed deliberations, **recommended** the project for grant of environmental clearance, subject to compliance of terms and conditions as under, and general terms of conditions at **Annexure:-**

- (i). The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.
- (ii). The effluent of 78.05 cum/day, proposed to be discharged to CETP Nandesari through pipeline after treatment, shall conform to the standards prescribed under the Environment (Protection) Act, 1986. The project proponent shall explore possibilities for recycle and reuse of treated water in the unit to reduce the fresh water demand and waste disposal.
- (iii). 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.

- (iv). The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
- (v). Occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
- (vi). Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.
- (vii). 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.
- (viii). Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (ix). Volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.99% with effective chillers/modern technology.
- (x). Total fresh water requirement shall not exceed 98.33 cum/day, proposed to be met from GIDC water supply. Prior permission in this regard shall be obtained from the concerned regulatory authority.
- (xi). Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.
- (xii). 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.
- (xiii). The green belt of at least 5-10 m width shall be developed in nearly 40% of the total project area, mainly along the plant periphery/adjacent areas. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map. Trees have to be planted with spacing of 2m x 2m and number of trees have to be increased accordingly. The plant species can be selected that will give better carbon sequestration. All trees must be planted within first year.
- (xiv). The activities and the action plan proposed by the project proponent to address the socio-economic issues in the study area, shall be completed as per the schedule presented before the Committee and as described in the EMP report in letter and spirit.
- (xv). A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

Agenda No. 8.5

Expansion for manufacturing of Synthetic organic chemicals 1071 TPM to 5050 TPM in existing unit, located at Plot No. 24, 24/1, GIDC Industrial Estate, Panoli-394116, Tal: Ankleshwar, Dist: Bharuch, Gujarat by M/s Merchem Limited- Consideration of Environment Clearance

[IA/GJ/IND3/203900/2020; IA/GJ/IND3/196414/2020, No. IA-J-11011/70/2020-IA-II(I)]

The proposal was earlier considered by the EAC in its meeting held during 17-19 November, 2020 and 22-23 February, 2021. The Committee has deferred the proposal for want of additional information and inconsistency. The ADS by the EAC and information provided by the PP is as under:

S. No	ADS by the EAC	Information provided by the PP and deliberation by the EAC
1.	The Committee noted that the project proponent was	As per Circular by Ministry of Environment and Forest IA Division, F. No. J-11013/41/2006-IA-II (I) Dated 21 st November, 2006 Such Projects for which NOCs issued before 14 th September, 2006 will not be required to take Environmental Clearance under the EIA Notification, 2006.

unable to provide justification for not obtaining environmental clearance for existing operations. The Committee observed that the information w.r.t. requirements of EC submitted by PP are confusing. The project Proponent shall submit a detailed justification, if any, for not considering the project under violation category. If PP fails to provide sufficient justification in the EAC

M/s. Merchem Limited obtained NOC Vide Letter No. GPCB/BRCH/NOC-3052/35452 Dated 7th December, 2005 for 5 Products [Production Capacity – 1071 MT/Month] Before EIA Notification, 2006

S. NO.	CTE DETAILS	CTO DETAILS																																	
1.	<p>Unit has obtained NOC Vide Letter No. GPCB/BRCH/NOC-3052/35452 Dated 7thDecember, 2005 for 5 Products [Production Capacity – 1071 MT/Month]</p> <table border="1"> <thead> <tr> <th>SR. NO.</th> <th>NAME OF THE PRODUCT</th> <th>QUANTIT Y MT/MONT H</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NaMBT Intermediate</td> <td>334</td> </tr> <tr> <td>2</td> <td>Thiazoles</td> <td>125</td> </tr> <tr> <td>3</td> <td>Sulphenamides</td> <td>290</td> </tr> <tr> <td>4</td> <td>Antioxidents</td> <td>167</td> </tr> <tr> <td>5</td> <td>Na₂S</td> <td>155</td> </tr> <tr> <td></td> <td>Total</td> <td>1071</td> </tr> </tbody> </table>	SR. NO.	NAME OF THE PRODUCT	QUANTIT Y MT/MONT H	1	NaMBT Intermediate	334	2	Thiazoles	125	3	Sulphenamides	290	4	Antioxidents	167	5	Na ₂ S	155		Total	1071	<p>Unit has obtained CCA for 2 Products & Captive Power Plant – Consent Order No. 30788 Dated 20th September, 2008 and Valid up to 2nd March, 2013 [Production Capacity – 489 MT/Month & Captive Power Plant – 1.364 MW]</p> <table border="1"> <thead> <tr> <th>S R . N O .</th> <th>NAME OF THE PRODUCT</th> <th>QUANTI TY MT/MON TH</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NaMBT Intermediate</td> <td>334</td> </tr> <tr> <td>2</td> <td>Na₂S (By Product)</td> <td>155</td> </tr> <tr> <td></td> <td>Total</td> <td>489</td> </tr> </tbody> </table>	S R . N O .	NAME OF THE PRODUCT	QUANTI TY MT/MON TH	1	NaMBT Intermediate	334	2	Na ₂ S (By Product)	155		Total	489
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2.	<p>Unit has obtained NOC Vide Letter No. GPCB/CE/BRCH/NOC-3463/18532 Dated 21st June, 2007 for Captive Power Plant – 1.364 MW. EC is not applicable for Captive Power Plant less than 5 MW as per EIA Notification, 14th September, 2006.</p>	<p>Unit has amendment to Consolidated Consent Order No. 30788 for addition of remaining 3 Products Dated 13th October, 2008 and Valid up to 2nd March, 2013 [Production Capacity – 1071 MT/Month & Captive Power Plant – 1.364 MW]</p>																																	

	may treat the proposal under violation category on merit.			<table border="1"> <thead> <tr> <th>SR. NO.</th> <th>NAME OF THE PRODUCT</th> <th>QUANTITY MT/MONTH</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NaMBT Intermediate</td> <td>334</td> </tr> <tr> <td>2</td> <td>Thiazoles</td> <td>125</td> </tr> <tr> <td>3</td> <td>Sulphenamides</td> <td>290</td> </tr> <tr> <td>4</td> <td>Antioxidants</td> <td>167</td> </tr> <tr> <td>5</td> <td>Na₂S (By Product)</td> <td>155</td> </tr> <tr> <td></td> <td>Total</td> <td>1071</td> </tr> </tbody> </table>	SR. NO.	NAME OF THE PRODUCT	QUANTITY MT/MONTH	1	NaMBT Intermediate	334	2	Thiazoles	125	3	Sulphenamides	290	4	Antioxidants	167	5	Na ₂ S (By Product)	155		Total	1071
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3.	Unit has obtained Consent to Establish (NOC) CTE – 53227 Vide Letter No. GPCB/BRCH/CCA-1172(2)/ID-25332/150617. Dated 19th June, 2013 for adding additional quantity of Natural Gas (850 M ³ /hr) as fuel & 1 Boiler (12 TPH)	Unit has obtained renewal of CCA Consent Order No. AWH-54363. Date of Issue – 27th May, 2013 and Valid up to 18th February, 2018. [Production Capacity – 1071 MT/Month & Captive Power Plant – 1.364 MW]	<table border="1"> <thead> <tr> <th>SR. NO.</th> <th>NAME OF THE PRODUCT</th> <th>QUANTITY MT/MONTH</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NaMBT Intermediate</td> <td>334</td> </tr> <tr> <td>2</td> <td>Thiazoles</td> <td>125</td> </tr> </tbody> </table>	SR. NO.	NAME OF THE PRODUCT	QUANTITY MT/MONTH	1	NaMBT Intermediate	334	2	Thiazoles	125													
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					4	Antioxidants	167
					5	Na ₂ S (By Product)	155
						Total	1071
		4.			Unit has amendment to Consolidated Consent Order No. AWH-54363, Dated 5 th December, 2013 and Valid up to 18 th February, 2018.		
					SR NO.	NAME OF THE PRODUCT	QUANTITY MT/M ONTH
					1	NaMBT Intermediate	334
					2	Thiazoles	125
					3	Sulphenamides	290
					4	Antioxidants	167
					5	Na ₂ S	155
						Total	1071

5.			Unit has obtained CCA – Consent Order No. AWH – 102280. Date of Issue 15 th June, 2019 and Valid up to 13 th May, 2024. [Production Capacity – 1071 MT/Month& Captive Power Plant – 1.364 MW]																					
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As per existing CCA Order No. AWH – 102280, Date of Issue 15/06/2019 and valid up to 13/05/2024. Production Capacity [1071 MT/Month] and No. of Products are the same as per NOC issued Vide Letter No. GPCB/BRCH/NOC-3052/35452 Dated 7th December, 2005 for 5 Products [Production Capacity – 1071 MT/Month] Before EIA Notification, 2006.

PP have applied for TOR dated 18th March, 2020 and Standard TOR No. IA-J-11011/70/2020-IA-II (I) was granted on dated 24th July, 2020. On behalf of us on 9th October, 2020 M/s. Shree Green Consultants have submitted EIA Report to obtain Environment Clearance. During meeting on 18th November, 2020 the EAC asked about Environment clearance condition mention in Consent to Establish (NOC) No. GPCB/BRCH/CCA-1172(2)/ID-25332/150617, CTE – 53227 Dated 19th June, 2013. During meeting we had committed about the Environment clearance with the available information and we as new management from the year 2019 were unaware of the Environment clearance condition printed in Consent to Establish (NOC) No. GPCB/BRCH/CCA-1172 (2)/ID-25332/150617. After that we have written letter dated on 18th November, 2020 to Regional Director-Bhopal and Additional Director MoEF&CC, New Delhi to do the needful to arrange a copy of the EC if available. But there were

		<p>no such EC could be found. The stated facts as above are true and we once again confirm to you that there is no violation of any statutes applicable in this.</p> <p>The Committee noted that the unit has obtained CTE during the year 2005 and as per the Ministry's circular dated 21st November, 2006, the project which obtained CTE/NOC before 14th September, 2006, not required to take EC. The project proponent has also informed that there was no increase in total production/product mix change. The Unit operated with valid CTO. PP has first time applied for expansion project as per the provisions of the EIA Notification, 2006. The Committee deliberated the submissions made by PP and found in Order.</p>
2.	<p>Affidavit that no violation has been taken and there was no increase in production, no product mix change undertaken, no expansion, no addition of equipments/ utilities leading to modernization of the plant, as per the EIA Notification, 2006.</p>	<p>PP have obtained Consent to Establish (NOC) No. GPCB/BRCH/NOC-3052/35452 Dated 7th December, 2005 for manufacturing five Products with the Production Capacity of 1071 MT/Month.</p> <p>In 2007, Merchem Limited PP obtained Consent to Establish (NOC) No. GPCB/CE/BRCH/NOC-3463/18532 Dated 21st June, 2007 for the Captive Power Plant of 1.364 MW capacity because EC is not applicable for captive power plant having Capacity of less than 5 MW.</p> <p>In 2008, Merchem Limited had converted the Consent to Establish (NOC) No. GPCB/BRCH//NOC-3052/35452 Dated 7th December, 2005 in to CCA for manufacturing two of the Products with the capacity 489 MT/Month& Captive Power Plant – 1.364 MW. Then after PP have applied for CCA Amendment Dated 20th September, 2008, which was granted to us on 13th October, 2008 for including the remaining three products with the capacity of 582 MT/Month in to CCA. So the total production Capacity granted was 1071 MT/Month.</p> <p>The manufacturing activities at Merchem Limited were stopped from December 2015 and the site was closed down its activities from January 2016. The Company has informed the local authority about closing down of Unit. Due to the financial constraints, the industry remained closed from January 2016 to March 2019.</p> <p>In 2019 Unit has obtained CCA Order No. AWH – 102280, Date of Issue 15/06/2019 and is Valid up to 13/05/2024. Production Capacity [1071 MT/Month] and No. of Products are the same as per NOC issued Vide Letter No. GPCB/BRCH/NOC-3052/35452 Dated 7th December, 2005 for 5 Products [Production Capacity – 1071 MT/Month] Before EIA Notification, 2006.</p> <p>The stated facts as above are true and PP once again confirm that there is no violation of any statutes applicable in this. PP have neither Increased the Production Capacity, nor the Product Mix. PP have not carried out any</p>

		<p>expansion after EIA Notification, 2006. Affidavit in this regard has been submitted.</p> <p>The EAC deliberated the issues and noted that EC is not required for the instant project as PP has got NOC in 07.12.2005 (Before the issuance of EIA Notification, 2006) and further as per OM/Circular issued by the Ministry from time to time. The Unit operated with valid CTO. PP has first time applied for expansion project as per the provisions of the EIA Notification, 2006. The Committee deliberated the submissions made by PP and found in Order.</p>
3.	<p>Justification for contradictory statements regarding EC earlier and now</p>	<p>During meeting on 18th November, 2020 the EAC committee asked about Environment clearance condition mention in Consent to Establish (NOC) No. GPCB/BRCH/CCA-1172(2)/ID-25332/150617, CTE – 53227 Dated 19th June, 2013. During meeting PP had committed about the Environment clearance with the available information and we are the new management from the year 2019 are unaware of the Environment clearance condition printed in Consent to Establish (NOC) No. GPCB/BRCH/CCA-1172 (2)/ID-25332/150617. After that we have written letter dated on 18th November, 2020 to Regional Director-Bhopal and Additional Director of MoEF&CC, New Delhi to do the needful to arrange a copy of the EC if available. But there was no EC found.</p> <p>PP have written letter to Regional office MoEF&CC, Bhopal and invited them for Certified Compliance Report. But when they came and no existing EC copy had been found we requested them for CCA Compliance Report.</p> <p>Moreover, PP were not provided with any such EC document by the resolution profession (RP), the statutory authority appointed under IBC, while transferring the company to the new management. The stated facts as above are true and PP once again confirm to you that our statement is true.</p> <p>The Committee deliberated the submissions made by PP and found in Order.</p>
4.	<p>Action plan on Non-compliances of CTO conditions w.r.t. green belt, HW management and other</p>	<p>PP have written letter to Regional office MoEF&CC, Bhopal and invited them for Certified Compliance Report. But when they came and no existing EC copy had been found we requested them for CCA Compliance Report. They had visited our site on 14th January, 2021. Certified CCA Compliance Report from MoEF & CC, Bhopal Dated 25th January, 2021. Copy of the Certified CCA Compliance Report is submitted. The Committee deliberated the submissions made by PP and found in Order.</p>

	issues etc. needs to be submitted																																					
5.	Details of existing products along with copies of all the CTE/CTO (tabular format).	S. No	CTE DETAILS			CTO DETAILS																																
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					2	Thiazoles	125
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		5.			<p>Unit has obtained CCA – Consent Order No. AWH – 102280. Date of Issue 15th June, 2019 and Valid up to 13th May, 2024. [Production Capacity – 1071 MT/Month& Captive Power Plant – 1.364 MW]</p> <table border="1" data-bbox="1091 514 1523 1239"> <thead> <tr> <th data-bbox="1091 514 1156 682">SR. NO</th> <th data-bbox="1156 514 1347 682">NAME OF THE PRODUCT</th> <th data-bbox="1347 514 1523 682">QUANTITY MT/MONTH</th> </tr> </thead> <tbody> <tr> <td data-bbox="1091 682 1156 808">1</td> <td data-bbox="1156 682 1347 808">NaMBT Intermediate</td> <td data-bbox="1347 682 1523 808">334</td> </tr> <tr> <td data-bbox="1091 808 1156 850">2</td> <td data-bbox="1156 808 1347 850">Thiazoles</td> <td data-bbox="1347 808 1523 850">125</td> </tr> <tr> <td data-bbox="1091 850 1156 934">3</td> <td data-bbox="1156 850 1347 934">Sulphenamides</td> <td data-bbox="1347 850 1523 934">290</td> </tr> <tr> <td data-bbox="1091 934 1156 1018">4</td> <td data-bbox="1156 934 1347 1018">Antioxidants</td> <td data-bbox="1347 934 1523 1018">167</td> </tr> <tr> <td data-bbox="1091 1018 1156 1060">5</td> <td data-bbox="1156 1018 1347 1060">Na₂S</td> <td data-bbox="1347 1018 1523 1060">155</td> </tr> <tr> <td data-bbox="1091 1060 1156 1186">6</td> <td data-bbox="1156 1060 1347 1186">Captive Power Plant</td> <td data-bbox="1347 1060 1523 1186">1.364 MW</td> </tr> <tr> <td data-bbox="1091 1186 1156 1239"></td> <td data-bbox="1156 1186 1347 1239">Total</td> <td data-bbox="1347 1186 1523 1239">1071</td> </tr> </tbody> </table> <p data-bbox="425 1243 1529 1318">Copies of all the CTE/CTO is submitted. The Committee deliberated the submissions made by PP and found in Order.</p>	SR. NO	NAME OF THE PRODUCT	QUANTITY MT/MONTH	1	NaMBT Intermediate	334	2	Thiazoles	125	3	Sulphenamides	290	4	Antioxidants	167	5	Na ₂ S	155	6	Captive Power Plant	1.364 MW		Total	1071
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6.	NOC from earlier consultant for utilization of data/EIA/EMP report by the present consultant.	<p>PP have applied for TOR dated 18th March, 2020 and Standard TOR No. IA-J-11011/70/2020-IA-II (I) was granted on dated 24th July, 2020. On behalf of us on 9th October, 2020 M/s. Shree Green Consultants have submitted EIA Report to obtain Environment Clearance.</p> <p>The EAC during deliberations noted that M/s. Shree Green Consultants presenting the case with the stay order from the Hon'ble High Court of Gujarat issued during 2016 and has not got accredited with QCI/NABET.</p> <p>Our Previous Consultant M/s. Shree Green Consultants is not accredited with QCI/NABET and we should not suffer any delay so we appointed M/s. Aqua Air Environmental Engineers Pvt. Ltd. accredited with QCI/NABET to represent our EC case.</p> <p>Copy of the NO OBJECTION CERTIFICATE from previous consultant is submitted. Committee deliberated the submissions made by PP.</p>																											
7.	Permission for effluent	<p>Unit has membership Letter of FETP of M/s. NCTL and Valid CCA to discharge 235 KL/Day Effluent in to FETP of M/s. NCTL. Membership Certificate No.</p>																											

	discharge to FETP needs to be submitted	P/M/E/D/M-61. Copy of the Letter of FETP of M/s. NCTL & Existing CCA is submitted. Committee deliberated the submissions made by PP.
8.	Commitment for using natural gas as fuel instead of coal, as the Unit is being located at critically polluted area.	Merchem Limited Located at Plot No. 24, 24/1, GIDC Industrial Estate, Panoli, Tal: Ankleshwar, Dist: Bharuch, Gujarat solemnly affirm herein that, for our steam boiler, we will use either natural gas or briquettes as fuel. Copy of the undertaking is submitted. The Committee deliberated the submissions made by PP and found in Order.
9.	PP has mentioned different details of EC for e.g. In form 2 at S No. 6 mentioned the date of EC is 25.01.2021, in CTE it is mentioned that the unit had obtained Environmental Clearance on 15/04/2008, in meeting	Merchem Limited Located at Plot No. 24, 24/1, GIDC Industrial Estate, Panoli-394 116, Tal: Ankleshwar, Dist: Bharuch, Gujarat. We obtained Consent to Establish (NOC) No. GPCB/BRCH/NOC-3052/35452 Dated 7 th December, 2005 for 5 Products and Production Capacity was 1071 MT/Month. PP have applied for TOR dated 18 th March, 2020 and Standard TOR No. IA-J-11011/70/2020-IA-II (I) was granted on dated 24 th July, 2020. While applying EC application on Parivesh Portal and fill up online Form – 2; PP have chosen Expansion as project type as we are increasing production capacity from 1071 MT/Month to 5050 MT/Month. Due to choosing Expansion as project type it is mandatory to add EC details and as we have not taken any earlier EC so we added details of Consent to Establish (NOC) No. GPCB/BRCH/NOC-3052/35452 Dated 7 th December, 2005. The Committee deliberated the submissions made by PP.

	PP cited that there is no EC and Unit is being operated with valid CTO. In this regard correct details of EC need to be submitted .	
10.	PP in form 2 at S No. 11 mentioned that there is no General condition, however in the EIA/EMP report it is mentioned that general condition w.r.t. CPA and hence PP submitted the instant proposal at Central level.	Panoli GIDC is located in Critically Polluted area. The Committee deliberated the submissions made by PP.
11.	PP in form 2 at	Total 89613.97 sq. meter land area is available at the site.

<p>S No. 20 mentioned that total land is 8.96139 ha, however the present land use breaks up for the study area is reported 3.1416ha which is not possible. PP/Consultant has not filled the details in Form 2 adequately.</p>	<p>While filling up Online Form - 2 for EC application we have entered 8.96139 ha. Land Ownership Details in Sr. No. 20. Total area of the project site is 8.96139 ha. Located at Plot No. 24, 24/1, GIDC Industrial Estate, Panoli-394 116, Tal: Ankleshwar, Dist.: Bharuch, Gujarat Which is correct and the present Land Use Breaks up for the Study Area is Reported 3.1416ha which is wrong. Correct details of the 10 KM radius from the project site is 31416 ha. We have mentioned correct study area in EIA Report but while uploading on Parivesh portal we have made mistake in unit conversion.</p> <p>The Committee deliberated the submissions made by PP.</p>
<p>12. The Member Secretary informed to the Committee that as per Division record there is no such project registered for EC in year</p>	<p>During meeting on 18th November, 2020 the EAC committee asked about Environment clearance condition mention in Consent to Establish (NOC) No. GPCB/BRCH/CCA-1172(2)/ID-25332/150617, CTE – 53227 Dated 19th June, 2013. During meeting we had committed about the Environment clearance with the available information and we as new management from the year 2019 were unaware of the Environment clearance condition printed in Consent to Establish (NOC). After that we have written letter dated on 18th November, 2020 to Regional Director-Bhopal and Additional Director MoEF & CC, New Delhi to do the needful to arrange a copy of the EC if available. But there were no such EC could be found.</p> <p>PP have written letter to Regional office MoEF&CC, Bhopal and invited them for Certified Compliance Report as there is no previous EC obtained.</p>

<p>2008. The Ministry may verify the authenticity of the Compliance status of the CTO issued by the Regional Office of the Ministry. The Regional Office may also be asked for availability of EC for the unit and requirement of EC for its existing operations</p>	<p>Moreover, we were not provided with any such EC document by the resolution profession (RP), the statutory authority appointed under IBC, while transferring the company to the new management.</p> <p>The Committee deliberated the submissions made by PP.</p>
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The Project Proponent and the accredited Consultant M/s Aqua-Air Environmental Engineers Pvt Ltd made a detailed presentation on the salient features of the project and informed that:

The proposal is for Expansion of Synthetic Organic Chemicals manufacturing unit from 1071 TPM to 5050 TPM by M/s Merchem Limited located at Plot No. 24, 24/1, GIDC Industrial Estate, Panoli, Taluka Ankleshwar, District Bharuch, Gujarat.

The details of products and capacity are as under:

S. No.	NAME OF THE PRODUCT	CAS No.	QUANTITY (MT/MONTH)		
			EXISTING	PROPOSED	TOTAL

I	CHEMICAL INTERMEDIATE				
1	NaMBT Intermediate (Sodium Mercapto Benzothiazole)	2492-26-4	334	226	560
2	4 - ADPA (P-amino diphenyl amine)-Intermediate	101-54-2	0	460	460
	Thiazoles				
3	MBT (2-Mercaptobenzothiazole)	149-30-4	125	125	300
4	MBTS (Dibenzothiazole Disulfide)	120-78-5			
5	ZMBT (Zinc-2-mercaptobenzothiazole)	155-04-4			
6	Activated Thiazole	288-47-1	0	50	
II	CO PRODUCTS				
	Na ₂ S/ NaHS	1313-82-2	155	105	260
	Benzothiazole	95-16-9	0	50	50
III	SULPHENAMIDES				
7	CBS (N-Cyclohexyl-2-benzothiazole sulfenamide)	95-33-0	290	310	600
8	TBBS (N-Tertiarybutyl-2-Benzothiazole Sulfenamide)	95-31-8			
9	MBS (2-(4morpholiniothio)-Benzothiazole)	102-77-2			
10	DCBS (Dicyclo Hexyl Benzo Thiazole Sulphenamides)	4979-32-2			
11	TBSI(N-T-BUTYL-2-benzothiazole sulphenimide)	95-31-8			
12	DBBS(N,N-Dibenzyl-2-benzothiozole Sulpenamide)	--			
IV	SPECIALTY CHEMICALS				
13	DHTS (Hexamethylene-1,6-Bis (thiosulphate),dihydrate)	5719-73-3	0	500	500
14	3-hydroxy-N(1-3-dimethylbutylidene)-2 Naphthohydrazide	214417-91-1			
15	ZDDP(Zinc Dialkyl Dithio Phosphate)	6990-43-8			
16	Hydro quinone Ethoxylated ether	104-37-1			
17	DBD (2,2-dithio bis -benzanilide)	120-78-5			
18	AHB(Aniline Heptaldehyde Base)	110-62-3			
19	DTDC(N, N' DithioCaprolactum)	23847-08-7			
20	TAIC(Tri-allyl-iso-cyanurate)	--			
21	TMBS (N-phenyl - N (Trichloro methyl sulphenyl)- benzene sulphenamide)	--			
22	TAT (2,4, Triallyloxy-1,3,5-Triazine)	101-37-1			
23	PBM (N N phenylene Bis maleimide)	3006-93-7			

24	CCMB (1,3- bis(citraconimidomethyl) benzene)	73046-18-1			
25	DBDH (1,6-bis (N,N-dibenzylthiocarbamoyldithio)-hexane	151900-44-6			
26	44PD (N,N' –di-sec-butyl-p- phenylenediamine (C14-H24-N2))	793-24-8			
27	DHTQ (Poly (1,2-dihydro-2,2,4- trimethylquinoline)	26780-96-1			
28	77PD (N,N'-Bis (1,4-Dimethylpentyl)-P-Phenylenediamine)	3081-14-9			
V ANTIOXIDANTS					
29	6PPD(N-(1,3-Dimethyl-Butyl)-N'-Phenyl-p-phenylenediamine) & Similar product	793-24-8	167	1233	1600
30	TDQ (Tri MethylDihydroQuinoline) & Similar product	147-47-7			
31	SP (Mixture of Styrenated Phenols)	--	0		
32	MB (2 - Mercapto Benzimidazole)	583-39-1		200	
33	ZMMB (Zinc Salt of 4 &5 , Methyl 2-mercapto Benzimidazole)	61617-00-3			
VI DITHIOCARBAMATE					
34	ZDBC (Zinc Di,N-Butyl DithioCarbamate)	136-23-2	0	200	200
35	ZBEC (Zinc Di Benzyl Dithio Carbamate)	14726-36-4			
36	ZDC (Zinc Di Ethyl Dithio Carbamate)	14324-55-1			
37	ZDMC(Zinc Di Methyl Dithio carbamate)	137-30-4			
38	SDMC (Sodium Di Methyl Di Thio Carbamate)	128-04-1			
39	DPTT (DiPenta Methylene Thiuram Tetra Sulphide)	120-54-7			
40	TBzTD (Tetra Benzyl Thiuram Disulphide)	10591-85-2			
41	TMT (Tetra Methyl Thiuram Disulphide)	137-26-8			
VII FORMULATION CHEMICAL					
42	Formulation Products/Repacking	--	0	500	500
VII R&D PRODUCT/CHEMICALS					
43	Thiazoles/ Sulphenamides/ Specialty Chemicals/Antioxidants/Dithiocarbamate & other	--	0	20	20
TOTAL		--	1071	3979	5050
	Captive Power Plant (will be discontinued after expansion).	--	1.36 MWH	-1.36 MWH	00 MWH

The project/activities are covered under category B of item 5(f) 'Synthetic organic chemicals industry' of the Schedule to the Environment Impact Assessment Notification, 2006. Due to applicability of general condition (located within 5 km of CPA), the project requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

The ToR has been issued by Ministry vide letter dated 24th July 2020. Public hearing is exempted since the proposed project is located in industrial area. It was informed that no litigation is pending against the proposal.

Existing land area is 89613.97 m²; no additional land is required for proposed expansion project. Industry has already developed Greenbelt in an area of 23% i.e., 20000 m² out of 89613.97 m² of area of the project. Unit will develop remaining area of 17% @15850 m² as green belt. The estimated project cost is Rs. 162.38 Crores including existing investment of Rs. 66.38 Crores. Total capital cost earmarked towards environmental pollution control measures is Rs.20.07 Crores and the Recurring cost (operation and maintenance) will be about Rs. 1.81 Crores per annum.

Total Employment will be 900 persons as direct & indirect for project. Industry proposes to allocate Rs. 96 Lakhs (approx.) in next 1 year of the additional project cost towards Corporate Environment Responsibility. No national parks, wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wild life Corridors etc. lies within 10 km distance.

Ambient air quality monitoring was carried out at 9 locations during March 1, 2019 to May 31, 2019 and submitted baseline data indicates that ranges of concentrations of PM10 (76.98 -95.94 µg/m³), PM2.5 (39.30 -50.79 µg/m³), SO₂ (17.52- 26.72 µg/m³) and NO₂ (15.26 - 28.53 µg/m³) respectively. AAQ modelling study for point source emissions indicates that the maximum incremental GLCs after the proposed project would be 0.01873 µg/m³, 0.27928 µg/m³ and 0.10005 µg/m³ with respect to PM10, SO_x and NO_x. The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).

Total water requirement is 3133 m³/Day out of it fresh water requirement is 2128 m³/Day and will be met from GIDC Water Supply. Effluent of 1346 m³/Day will be treated through ETP, STP and Solvent Stripper & MEE. 1346 KL/Day industrial effluent will be generated from the unit and will be divided into three Streams: -

STREAM-I:

498.4 KL/Day Low TDS stream (from process, boiler, cooling, washing) will be treated in ETP giving primary, Secondary & Tertiary treatment and out of it 205 KLD effluent will be stored in guard pond for disposing to FETP of M/s. NCTL, Ankleshwar which ultimately lead to deep sea for final disposal through NCTL pipeline and remaining treated effluent 288 KLD will be sent to MEE for the further treatment & reused in the plant.

STREAM-II:

High TDS effluent 747.6 KLD will be subjected to stripper column followed by MEE and ATFD. Treated effluent 647 KLD will be reused in the plant.

STREAM-III:

100 KL/Day Domestic wastewaters will be treated in STP & Out of it 70 KL/Day will be reuse in Gardening and remaining 30 KL/Day will be disposing to FETP of M/s. NCTL, Ankleshwar which ultimately lead to deep sea for final disposal through NCTL pipeline.

Existing Discharge of 235 KL/Day will be remaining same and Additional Waste Water 1111 m³/Day will be based on Zero Liquid Discharge System.

Power requirement for after proposed expansion project will be 2500 KVA (Proposed) will be met from DGVCL and (Existing) Captive Power Plant (1.36 MWH) will be remove after expansion. (Existing) There is no D.G Set and (Proposed) 2 Nos. DG set of 750 KVA & 1250 KVA capacity shall be used as standby during power failure. Stack (height 11 m) will be provided as per CPCB norms.

Unit shall have Existing 1 Nos. of 12 TPH Steam Boiler – 30 M Height, 1 Nos. of 5 TPH Boiler –30 M Height and proposed 4 Nos. of TFH (6 L Kcal/hr) – 30 M Height, 1 Nos. of Steam Boiler (22 TPH) – 40 M Height, 2 Nos. of DG Set (750 KVA) & (1250 KVA) – 11 M Height set will be installed. Adequate Stack height & ESP and water scrubber will be installed for controlling the Particulate emissions (within statutory limit of 150 mg/Nm³) respectively. Steam boiler (5 TPH) will be removed after expansion.

Details of Process emissions generation and its management.

Flue Gas Stack

SR. NO.	PARTICULARS	FUEL	FUEL QUANTITY	STACK HEIGHT	EMISSION NORMS	APCM
EXISTING						
1	Steam Boiler (12 TPH)	Natural Gas	2212.5 m ³ /hr.	30 m	PM<150 mg/nm ³ SO ₂ < 100 ppm NO _x < 50ppm	Adequate Stack Height
2	Steam Boiler* (5 TPH)	Natural Gas	4425 m ³ /hr.	30 m		Adequate Stack Height
3	Captive power plant*	Natural Gas		30 m		--
PROPOSED						
1	TFH -1 (6 L Kcal/hr)	Natural Gas	1680 SCMD	30 m	PM<150 mg/nm ³ SO ₂ < 100ppm NO _x < 50ppm	Adequate Stack Height

2	TFH - 2 (6 L Kcal/hr)	Natural Gas	1680 SCMD	30 m	PM<150 mg/nm ³ SO ₂ < 100ppm NO _x < 50ppm	Adequate Stack Height
3	TFH - 3 (6 L Kcal/hr)	Natural Gas	1680 SCMD	30 m	PM<150 mg/nm ³ SO ₂ < 100ppm NO _x < 50ppm	Adequate Stack Height
4	TFH - 4 (6 L Kcal/hr)	Natural Gas	1680 SCMD	30 m	PM<150 mg/nm ³ SO ₂ < 100ppm NO _x < 50ppm	Adequate Stack Height
5	Steam Boiler (22 TPH)	Natural Gas/ Briquette/ Coal	12430 SCMD/ 109.08 MT/DAY/ 100 MTD	40 m	PM<150 mg/nm ³ SO ₂ < 100ppm NO _x < 50ppm	Adequate Stack Height with ESP and water scrubber
6	D. G. Set (750 KVA)	HSD	166 Lit/hr.	11 m	PM<150 mg/nm ³ SO ₂ < 100 ppm NO _x < 50ppm	Adequate Stack Height
7	D.G Set (1250 KVA)	HSD	275 Lit/hr.	11 m	PM<150 mg/nm ³ SO ₂ < 100 ppm NO _x < 50ppm	Adequate Stack Height

***NOTE: - Captive power plant & steam boiler (5 TPH) will be removed after expansion.**

PROCESS STACK

SR. NO.	LOCATION	HEIGHT (M)	PARAMETERS	APCM	PRESCRIBED NORMS
EXISTING					
1	Flare Stack	31	Scrubber	PM	150 mg/nm ³
				SO ₂	40mg/nm ³
				NO _x	25mg/nm ³
				HCl	20mg/nm ³
				Chlorine	9 mg/nm ³
				H ₂ S	45 mg/nm ³
				CO	150 mg/nm ³
PROPOSED					
1	Process Stack	16	Two stage Scrubber	HCl Cl ₂	20mg/nm ³ 09mg/nm ³
2	Process Stack	16	Two stage Scrubber	NH ₃	175 mg/nm ³

Details of Solid waste/ Hazardous waste generation and its management. 12 Categories of Hazardous/Solid Wastes shall be generated from this Unit.

Total Proposed

Used Oil (Existing) @ 2.37 MT/Annum & (Total Proposed) @ 15.48 MT/Annum shall be Collected, Stored, Transported and Disposal by selling to registered refiners. Discarded Container (Existing) @ 18.25 MT/Annum & (Total Proposed) @ 54.75 shall be Collection, Storage, Decontamination, Transportation, and Disposal by selling to authorize recycler. ETP waste (Existing) @ 3311 MT/Annum & (Total Proposed) @ 19680 MT/Annum shall be Collected, Stored, Transported and Disposal at TSDF site of BEIL/SEPPL. Process Residue (Existing) @ 72.3 MT/Annum & (Total Proposed) @ 9611 MT/Annum shall be Collection, Storage, Transportation & disposal by incineration at CHWIF of BEIL/ SEEPL or Co- processing to cement industries / waste mixing facility for cement industries. E-Waste (Total Proposed) @ 1.5 MT/Annum shall be Collection, storage, transportation and disposal by sell it to approved/registered E-waste recycler. Fly ash (Total proposed) @ 3139.20 MT/Annum shall be Collection, storage, transportation and selling to brick manufacturer. Plastic Waste (Total Proposed) @ 120 MT/Annum shall be Collection, Storage, Transportation and sending to TSDF of BEIL/SEPPL or approved TSDF Site and send to registered recyclers. Used PPE's (Total Proposed) @ 10 MT/Annum Collection, Storage, Transportation and sending to TSDF of BEIL/SEPPL or Approved TSDF Site. Used Batteries @ (Total proposed) @ 60 Nos. shall be Collection, Storage and sold to approved Recyclers. Spent/ Mix Solvent (Total proposed) @ 8945 MT/Annum shall be Collection, Storage, in-house distillation and re-use in premises or sale to authorize user. Recovered Solvent (Total Proposed) @ 108961 MT/Annum shall be Collection, Storage, in-house distillation and re-use in premises or sale to authorize user. Stripper Residue (Total proposed) @ 576 MT/Annum Collection, Storage, Transportation & disposal by incineration at CHWIF of BEIL/ SEEPL or Co- processing to cement industries / waste mixing facility for cement industries

Deliberations in the EAC:

The EAC, constituted under the provision of the EIA Notification, 2006 and comprising of Experts Members/domain experts in various fields, examined the proposal submitted by the Project Proponent in desired form along with EIA/EMP report prepared and submitted by the Consultant accredited by the QCI/ NABET on behalf of the Project Proponent.

The EAC noted that the Project Proponent has given an undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environmental concerns and the projected scenario for all the

environmental components. The Committee found the baseline data and incremental GLC due to the proposed project within NAAQ standards. The Committee also deliberated on the activities/action plan and found to be addressing the issues in the study area. The Committee suggested that the storage of toxic/explosive raw material shall be bare minimum in quantity and inventory. The Committee noted that the project proponent committed before the Committee that Coal shall not be used as fuel, instead shall go for cleaner fuels. Action plan discussed for control and management of pollution in the CPA found to be satisfactory. While using agro-fuels, it was informed that the fly ash shall be collected and given to brick manufactures. The Committee noted that the unit has obtained CTE during the year 2005 and as per the Ministry's circular dated 21st November, 2006, the project which obtained CTE/NOC before 14th September, 2006, not required to take EC. The project proponent has also informed that there was no increase in total production/product mix change. Though there was addition of certain associated facilities like boilers in the unit, which otherwise as stand alone does not require EC, the Committee given the benefit of doubt on applicability of the EIA Notification (modernization/changes in the unit) in favour of the project proponent. The Committee found the additional information submitted by the project proponent to be satisfactory and addressing to the concerns of the Committee.

The EAC has also deliberated the certified compliance status of CTO submitted by IRO, MoEFCC Bhopal and found in order. The EAC deliberated on the proposal with due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC found the proposal in order and have recommended for grant of environmental clearance.

The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

The EAC, after detailed deliberations, **recommended** the project for grant of environmental clearance, subject to compliance of terms and conditions as under, and general terms of conditions at **Annexure:-**

- (i). The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.

- (ii). The treated effluent of 235 cum/day, proposed to be discharged to FETP Ankleshwar, shall conform to the standards prescribed under the Environment (Protection) Act, 1986.
- (iii). 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.
- (iv). The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
- (v). Occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
- (vi). Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.
- (vii). 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.
- (viii). Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (ix). Volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.99% with effective chillers/modern technology.
- (x). Total fresh water requirement shall not exceed 2128 cum/day, proposed to be met from GIDC water supply. Prior permission in this regard shall be obtained from the concerned regulatory authority.
- (xi). Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.

- (xii). 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.
- (xiii). The green belt of at least 5-10 m width shall be developed in nearly 40% of the total project area, mainly along the plant periphery. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map. Trees have to be planted with spacing of 2m x 2m and number of trees have to be increased accordingly. The plant species can be selected that will give better carbon sequestration. All trees must be planted within first year.
- (xiv). The activities and the action plan proposed by the project proponent to address the socio-economic issues in the study area, shall be completed as per the schedule presented before the Committee and as described in the EMP report in letter and spirit.
- (xv). A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

Agenda No. 8.6: Any other items with the permission of the Chair.

Expansion of Chemical Manufacturing Unit (91, 338 TPA to 183, 272 TPA) at Plot no. 112, 20/1 & OS-2, MIDC Dhatav, Tehsil- Roha, District- Raigad (Maharashtra) by M/s Excel Industries Limited – Corrigendum/Amendment in Environmental Clearance- reg.

[IA/MH/IND2/191436/2021, IA-J-11011/139/2020-IA-II(I)]

The proposal for corrigendum/amendment in environmental clearance dated 24.12.2020 for the project 'Expansion of Chemical Manufacturing Unit (91, 338 TPA to 183, 272 TPA)' at Plot no. 112, 20/1 & OS-2, MIDC Dhatav, Tehsil- Roha, District- Raigad (Maharashtra) by M/s Excel Industries Limited was recommended by EAC (Industry-3) in its earlier meeting held on 22-23 February, 2021. It was informed to the Committee that as recommended the comments of the Industry 2 Sector was obtained and accordingly the proposal is placed before the instant EAC meeting.

The Committee, reiterated its stand and recommended the corrigendum/amendment in respect of details of Hazardous waste, process waste (non-hazardous), domestic waste, Process Stack emissions, its fuel requirement.

The Committee, after deliberations, in the said meeting slightly modified the specific condition (iv) in respect of details on discharge of treated wastewater, based on comments of Industry-2 sector as under:

“The proposed expansion shall be on Zero Liquid Discharge (ZLD) and no waste/treated water shall be discharged outside the premises. However, the existing unit shall continue to discharge their excess treated water to CETP as per CTE/CTO and shall convert into ZLD within a span of 3 years from the date of issue of the clearance. The Compliance of the same may be submitted to the concerned Regional Office of this Ministry”

The Committee **recommended** the above proposed Corrigendum/amendments in the environmental clearance dated 24.12.2020, with all other terms and conditions unchanged.

The meeting ended with thanks to the Chair.

GENERAL CONDITIONS

- (i) No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. 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/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
- (ii) The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and other rules notified under various Acts.
- (iii) The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
- (iv) 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 the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
- (v) The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
- (vi) The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
- (vii) A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
- (viii) The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.

- (ix) The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by e-mail.
- (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 and at <https://parivesh.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.
- (xi) 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.
- (xii) This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.

List of the Expert Appraisal Committee (Industry-3) members participated during Video Conferencing (VC) meeting

S. No.	Name of Members	Designation
1.	Dr. Rajashekar P. Mandi Director, School of Electrical & Electronics Engineering, REVA University, Bangalore - 64 E-mail: rajashekarmandi@yahoo.com	Chairman
2.	Dr. Ashok Kumar Saxena, IFS Bungalow No. 38, Sector-8A, Gandhinagar, Gujarat – 382008 E-mail: ashoksaxena1159@gmail.com	Member
3.	Prof. (Dr.) S. N. Upadhyay Research Professor (Hon.), Department of Chemical Engineering & Technology, Indian Institute of Technology (Banaras Hindu University), Varanasi E-mail: snupadhyay.che@iitbhu.ac.in	Member
4.	Shri Santosh Gondhalkar 'Shree' Apartment, Flat 401, Plot No. 22, Tukaram Society, Santnagar, Pune- 411009 E-mail: santoshgo@gmail.com	Member
5.	Dr. Suresh Panwar House No.4, Gayateri Green Society, NH 58 Bypass,Kankerkhera, Meerut, Uttar Pradesh Email-spcppri@gmail.com	Member
6.	Shri Tukaram M Karne Nagpur, Maharashtra E-mail: tmkarne@gmail.com	Member
7.	Dr. Uma Kapoor Regional Director, CGWA, 18/11, Jamnagar House, Mansingh Road, New Delhi E-mail: Uma-cgwb@nic.in	Member
8.	Shri Dinabandhu Gouda Additional Director, DH IPC-I, Room No. 309A, Third Floor, Central Pollution Control Board, PariveshBhawan, East Arjun Nagar, Delhi – 110032 E-mail: dinabandhu.cpcb@nic.in	Member
9.	Shri Sanjay Bisht Scientist 'E', Room No. 517, Office of the Director General of Meteorology, Indian Meteorological Department, Musam Bhawan, Lodhi Road, New Delhi -110003	Member

	E-mail: sanjay.bist@imd.gov.in	
10.	Dr. R. B. Lal, Scientist 'E'/Additional Director Ministry of Environment, Forest and Climate Change Jor Bag Road, New Delhi-110003 Telefax: 011-24695362, E-mail: rb.lal@nic.in	Member Secretary
MoEFCC		
13.	Dr. Saranya P.	Scientist 'D'
14.	Dr. E.P. Nobi	Research Officer
15.	Mr. Ritin Raj	Research Assistant

Approval of EAC Chairman

Email

Additional Director MoEFCC Dr R B LAL

Re: Revised Draft Minutes of the 8th EAC (Industry-3) meeting held on March 25, 2021, after compilation of comments of EAC

From : rajashekarmandi@yahoo.com

Sun, Apr 04, 2021 12:16 PM

Subject : Re: Revised Draft Minutes of the 8th EAC
(Industry-3) meeting held on March 25, 2021,
after compilation of comments of EAC

To : Additional Director MoEFCC Dr R B LAL
<rb.lal@nic.in>

Reply To : Rajashekar Mandi
<rajashekarmandi@yahoo.com>

Dear Dr. R.B. Lal,

The draft report is in order and is approved. It may be uploaded in website.

With warm regards,

Dr. Rajashekar P. Mandi, PhD, SMIEEE

Director, School of Electrical & Electronics Engineering,
REVA University,

Chairman | Expert Appraisal Committee (EAC) - Industry 3 | Ministry of Environment,
Forest & Climate Change | Govt. of India
