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

Dated: 12.01.2025

MINUTES OF THE 92nd EXPERT APPRAISAL COMMITTEE (INDUSTRY-3 SECTOR) MEETING HELD ON 7th January, 2025 for Project proposal listed in Parivesh 1.0.

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 onwards

(i) Opening Remarks by the Chairman

Prof. (Dr.) A.B. Pandit, Chairman welcomed the Committee members and opened the EAC meeting for further deliberations.

(ii) Details of Agenda items by the Member Secretary

The Member Secretary then apprised the Committee about the details of Agenda items to be discussed during this Expert Appraisal Committee (EAC) meeting.

(iii) Confirmation of Minutes of the 91st EAC Meeting held on 16th – 17th December 2024

The EAC noted that the final minutes of the above meeting were issued after incorporating the comments offered by the members and approved by the Chairman.

Parivesh 1.0

Agenda No. 92.1

Addition of adjoining Plot No. 55/2/B with existing Plot No. 56/B-2 for Synthetic Organic Chemical products (Dyes & Dyes Intermediates)" at Plot no. 56/B-2 and 55/2/B, Phase - 1, GIDC Vatva, Ahmedabad- 382445, Gujarat by M/s. Huechem Global (Formerly known as M/s. Laakoona Reactions - Amendment of EC

[Proposal No.:- IA/GJ/IND3/298667/2023, F. No.: IA-J-11011/170/2023-IA-II(I)

1. The proposal is for Amendment in Environmental Clearance to the project, "Addition of adjoining Plot No. 55/2/B with existing Plot No. 56/B-2 for Synthetic Organic Chemical products (Dyes & Dyes Intermediates)" at Plot no. 56/B-2 and 55/2/B, Phase - 1, GIDC Vatva, Ahmedabad- 382445, Gujarat by M/s. Huechem Global (Formerly known as M/s. Laakoona Reactions).
   The Transfer of EC and name change from M/s. Laakoona Reactions to M/s. Huechem Global has been granted to M/s. Huechem Global vide File No: SEIAA/GUJ/EC/5(f)/872/2020 dated 12.08.2024.
2. All the Synthetic Organic Chemical products are listed at S. No. 5(f) of the Schedule of Environment Impact Assessment (EIA) Notification under Category "B" but the project is located in Critically

Polluted Area of GIDC Vatva, Gujarat. Hence it is considered as Category "A" project and appraised at Central Level by Expert Appraisal Committee (EAC).

3. The project proposal was earlier considered in the 50th (19-21 April 2023), 83rd (31st July 2024) and 87th (21-22 October 2024) EAC meetings. The project proposal is now considered by the Expert Appraisal Committee (Industry-3) in its in its 92nd meeting held on 07-08th January 2025 wherein the Project Proponent **M/s. Huechem Global (Formerly known as M/s. Laakoona Reactions** and the accredited Consultant M/s. Perfact Enviro Solutions Pvt. Ltd., made a detailed presentation on the salient features of the project and informed that:(NABET Registered NABET/EIA/2225/RA0284 (Rev. 01) valid up to 26.11.2025).

4. Existing land area as per EC is 2636 m2, proposed additional land area is 3681 m^2, Total area after expansion will be 6317 m^2.

5. The project proponent has requested for amendment in EC issued by SEIAA, Gujarat vide EC letter No. SEIAA/GUJ/EC/5(f)/872/2020 dated 07.07.2020 with the details here as under:

S. N.	Plant/Equipment/ Facility	Existing Configuration	Proposed Configuration	Final configuration after Amendment	Remarks if Any
1	Request for addition of plot no. in EC Subject, Para 2, by addition of adjacent plot i.e., plot no. 55/2/B	Project address: Plot no. 56/B-2, Phase - 1, GIDC Vatva, Ahmedabad- 382445, Gujarat	Project address: Plot no. ***55/2/B*** Phase - 1, GIDC Vatva, Ahmedabad-382445, Gujarat	Project address: Plot no. 56/B-2 & ***55/2/B*** Phase - 1, GIDC Vatva, Ahmedabad-382445, Gujarat	Addition of plot no. ***55/2/B*** with existing plot 56/B-2
2	Condition no. 112	The unit shall develop green belt within premises as per the CPCB guidelines, However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on road sides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC I GPCB and submit an action plan of plantation for next three years to the GPCB.	To comply with the existing condition of EC unit to purchase a new adjacent land having plot area 3681 m^2. And as per the guidelines and unit falls under CPA unit will maintain 40% greenbelt of total plot area. (Existing plot area: 2636 m^2 + Proposed plot area: 3681 m^2 = Total plot area: 6317 m^2) i.e 2527 m^2	40% greenbelt of total plot area will be maintained	–
3	Plot area, Greenbelt area:	2636 m^2 208.00 m^2	3681 m^2 2527 m^2	6317 m^2 2527 m^2	5-10 m thick greenbelt shall be provided along the periphery of the boundary of the plot.
4	Production	No change			

6. Certified compliance report was issued by MoEF&CC vide File no. J-11/10-2023-IROGNR dated 18.04.2023: as per the summary note, Out of 142 conditions, 73 was compiled, 4 was partially complied, 31 was agreed to comply by Project Proponent, 9 was noted by the unit, 4 conditions was not applicable to the unit whereas 21 conditions can't be ascertained. In reply to the CCR the PP submitted the ATR on 22.05.2023.

7. There are no national parks, wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. within 10 km distance from the project site.

8. The existing water requirement is 84.6 KLD (Fresh water 58.73 KLD + Reuse water 26.87 KLD), Proposed water requirement will be 2 KLD (for R & D unit). Hence, the total water requirement after expansion will be 86.6 KLD (Fresh water 60.73 KLD + Reuse water 25.87 KLD).

9. Existing wastewater generation is 85.33 KLD. The proposed wastewater generation due to expansion will be 1.8 KLD. Hence, the total wastewater generation after the expansion will be 85.33 KLD. Wastewater discharge permission is 51.16 KLD to common spray dryers and 7.3 KLD to CETP. Sewage will be treated in STP.

10. Power requirement after expansion will be 250 kVA and will be met from Torrent Power.

11. Existing unit has a 2 MT PNG fired boiler. No additional boiler has been proposed for the expansion phase. Adequate stack height will be set as Air pollution control measures (APMC)

12. Details of fuel is given below:

Sr. no.	Utilities	Type of Fuel	Quantity of Fuel, MT/ Day	Proposed	Total
1	Boiler (2 MT)	PNG	300 SCM/ day	-	300 SCM/ day
2	2 X Hot Air Generator (600 kg Kcal)	PNG	6000 SCM/ day	-	6000 SCM/ day

13. Details of Process emissions generation and its management is given below:

Sl. No.	Stack attached to	Height of stack (m)	APCM	Permissible Limit (µg/m3)		
				PM	SOx	HCl
1	Chloro Sulphonic Vessel	15	Venturi water scrubber + packed column water scrubber + Packed column alkali scrubber	150	40	20
2	Spray Dryer	20	Multi Cyclone Dust Collector followed by Two Stage Wet Scrubber			

14. Details of Solid waste/ Hazardous waste generation and its management as shown below:

Solid/ Hazardous waste Management

S. No.	Type/ Name of Waste	Specific Source of generation (Name of the Activity, Product etc.)	Category and Schedule as per HW Rules	Qty of Generation (MT/Annum)			Management of HW
				Existing	Proposed	Total	
1	Used oil	Lubrication in plant machineries	5.1	8	12	20	Collection, storage, reuse, disposal by selling to registered recycler
2	Process waste (Iron Sludge}	From manufacturing Process of DASA, FC Acid, OPSAMIDE, Metanilic Acid, 'N-(4-(((4-aminophenyJ)sulfonyl] amino] phenyl] acetamide, Sodium 5-amino-2- (4-aminoanilino) benzene sulphonate, 4 ADAPSA, 4 NADAPSA, 6-Chlor 4-Nap, HEGN Stage 2, 4-NAPSA	26.1	384	5274	5658	Collection, storage, transportation and selling to cement industry for co-processing
3	Spent sulphonic acid (25-30%)	Manufacturing Process of DASA, OPSAMIDE, 'N-(4-(((4- aminophenyl} sulfony l] amino] phenyl] acetamide, PCOSA, 4 Acetyl Sulphonamide	26.3	1320	10644	11964	Collection, storage, transportation, disposal by sending to NOVEL - 1320 MT/Year And to actual end user having rule-9 permission - 4500 MT/Year
4	Spent Carbon	Generation from manufacturing process of 6- Cholro-4 NAP	26.5	0	3	3	Collection, storage, transportation, disposal at TSDF.
5	Discarded containers & bags	Raw Material/ Production Section	33.1	10	25	35	Collection, storage, decontamination, reuse, transportation, disposal by selling to authorized recycler
6	ETP Waste	Effluent treatment plant	35.3	42	119	1611	Collection, storage, transportation, disposal at TSDF.
7	Spent hydrochloric acid (20-25%)	HCl gas generated from manufacturing process of DASA, 'N-(4-(((4-	-	0	1.83	1.83	Collection, Storage & reuse in manufacturing process of 4 ADAPSA (96 MT /Y} & 4 NADPSA (264

S. No.	Type/ Name of Waste	Specific Source of generation (Name of the Activity, Product etc.)	Category and Schedule as per HW Rules	Qty of Generation (MT/Annum)			Management of HW
				Existing	Proposed	Total	
		aminophenyl}sulfonyl] amino] phenyl] acetamide, PCOSA, 4 Acetyl Sulnhonamide will be scrubbed in Venturi Water Scrubber & Packed column water scrubber.					MT/Y) at own premises

15. Public Hearing for the proposed project is exempted since the project is located within the Industrial area of GIDC Vatva, Ahmedabad, Gujarat.

16. Industry will develop green belt in an area of 40% i.e., 2527 m2 out of total area of the project (6317 m2)

17. The estimated project cost is INR 47.6951 Lakh

18. Total Employment from the project is 85 persons.

19. The details of the activity and its budget allocated:

S. N.	Activity	Amount Allocated
1.	Total Project Cost	Rs. 47.6951 Lakh
2	Total land area	Existing: 2636 m^2, Proposed: 3681 m^2 and Total: 6317 m^2
3	P. H. Commitment	Exempted
4	Green belt	2527 m^2 (40%)
5	Water supply	GIDC water supply
6	Critical issues related to the Project, if any	Project is located in CPA of GIDC Vatva, Gujarat

20. **Deliberations by the EAC:**

(i) The Committee noted that the Transfer of EC and name change from M/s. Laakoona Reactions to M/s. Huechem Global has been granted to M/s. Huechem Global vide File No.: SEIAA/GUJ/EC/5(f)/872/2020 dated 12.08.2024.

(ii) PP informed that GIDC vide letter no GIDC/RM/AHM/TRF/FTO/VAT1/499 dated 1/10/2022 has transferred the industrial plot no 55/2/B at Vatva Industrial Estate to M/s Huechem Global.

(iii) PP informed that Greenbelt development layout is revised to meet the requirements of 33% of plot area within the premises - Existing green area will be increased from 150.00 Sq.m to 208 Sq.m, Green area in the proposed additional land will be 1217 Sq.m to 1877 Sq.m. Additionally, 500 Sq.m (equivalent to 7% of plot area) Greenbelt will be developed within the GIDC Vatva Industries Association. PP has taken an allotment letter form GIDC Vatva Industries Association for outside 7% green belt vide letter no. VIA/2024-25/25-B/189 dated 24.10.2024. The Committee suggested to submit the coordinates of the additional greenbelt outside the plant premises.

(iv) Pointwise compliance report as OM dated 31.10.2019 for critically and severely polluted area has been submitted :

<table>
<tr><th>Environment</th><th>Mitigation Measures</th><th>Compliance
Reply in Existing Phase</th></tr>
<tr><td></td><td></td><td>Compliance</td></tr>
<tr><td>Air Emissions</td><td>i. Stack emission levels should be stringent than the existing standards in terms of the identified critical pollutants.</td><td>Boiler- 2 TPH, One Number- Operational with a stack of height 15 m fitted with adequate stack height. Fuel used is PNG. Latest Best available Technologies are adopted in the Boiler design to limit PM emission within limits.</td></tr>
<tr><td></td><td colspan="2">
<table>
<tr><th>S.No.</th><th>Parameters</th><th>Unit</th><th>Results</th><th>Standard Permissible Limit as per EPA</th><th>Stringent Permissible Limit for CPA</th></tr>
<tr><td colspan="6">Process Gas Stacks Emission (Spray Dryer and Chloro Sulphonic Vessel) Results Range:</td></tr>
<tr><td>1</td><td>PM</td><td>mg/NM^3</td><td>74.6-76.8</td><td>150</td><td>120</td></tr>
<tr><td>2</td><td>SO_X</td><td>PPM</td><td>10.5-12.0</td><td>40</td><td>32</td></tr>
<tr><td>3</td><td>HCl</td><td>PPM</td><td>7.2-8.2</td><td>20</td><td>16</td></tr>
<tr><td colspan="6">Boiler Stack Emission Results (Flue Gas Stack)</td></tr>
<tr><td>1</td><td>PM</td><td>mg/NM^3</td><td>98.5-99.0</td><td>150</td><td>120</td></tr>
<tr><td>2</td><td>SO_X</td><td>PPM</td><td>10.5-13.5</td><td>100</td><td>80</td></tr>
<tr><td>3</td><td>NO_x</td><td>PPM</td><td>9.3-10.3</td><td>50</td><td>40</td></tr>
</table>
</td></tr>
<tr><td>Air Emissions</td><td>ii. CEMS may be installed in all large/ medium red category industries (air polluting) and</td><td>The plant falls under small category industries, hence installation of CEMS is not applicable.</td></tr>
</table>

<table>
<tr><th>Environment</th><th>Mitigation Measures</th><th>Compliance
Reply in Existing Phase</th></tr>
<tr><td></td><td>connected to SPCB and CPCB server.</td><td></td></tr>
<tr><td></td><td>iii. Effective fugitive emission control measures should be imposed in the process of transportation, packing etc.</td><td>There is no use of solvent in the plant .
The plant is designed as such that fugitive emissions are controlled at source by selection of most suitable equipment and accessories
● The process itself is a closed loop system, which eliminates fugitive emission.
● Use of special non-diffusing joint sealants for piping and equipment
● The traces of acidic/ volatile vapor generated in from any process vessels is sent to the Alkali scrubbers
● Mechanical seals for reactors, pumps; flange guards are in place; wherever possible magnetic coupled pump shall be used.
● Process: Use of closed loop systems is practiced in the process for arresting fugitive emissions. Charging of liquid & solid raw materials will be done under vacuum wherever necessary. All pumps are provided with mechanical seals to avoid leakages.
● Closed Packing system for finished product are installed.
● Valves and flanges preventive maintenance program is followed regularly. Regular monitoring of system for leaks.
● Mechanical integrity programme system is implemented.</td></tr>
<tr><td></td><td>iv. Transportation of materials by rail/ conveyor belt, wherever feasible.</td><td>Not Applicable</td></tr>
<tr><td></td><td>v. Encourage use of cleaner fuels (pet coke/ furnace oil/ LSHS may be avoided).</td><td>As per EC, PNG is used in the boilers equipped with adequate stack height and fuels like pet coke/ furnace oil/ LSHS are not used.</td></tr>
<tr><td></td><td>vi. Best Available Technology may be used. For example, usage of EAF/SAF/IF in place of Cupola furnace: Usage of Supercritical technology in place of sub-critical technology.</td><td>Not applicable</td></tr>
<tr><td></td><td>vii. Increase of green belt cover by 40% of the total land area beyond the permissible requirement of 33%, wherever feasible.</td><td>
<table>
<tr><th>Particulars</th><th>Existing(I)</th><th>New Plot(II)</th><th>After Plot addition (I) + (II)</th></tr>
<tr><td>Internal Green belt in sqm (A) (inside plant premises)</td><td>208.00</td><td>1877.00</td><td>2085.00</td></tr>
<tr><td>External Green belt in sqm (B) (outside premises)</td><td>0.00</td><td>500.00</td><td>500.00</td></tr>
<tr><td>Total Green belt in sqm (C = A + B)</td><td>208.00</td><td>2377.00</td><td>2585.00</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Environment</th><th>Mitigation Measures</th><th>Compliance</th></tr>
<tr><td></td><td></td><td>Reply in Existing Phase
<table>
<tr><td>Plot area in sqm (D)</td><td>2636.00</td><td>3681.00</td><td>6317.00</td></tr>
<tr><td>Internal Green % (A/D)</td><td>7.89</td><td>50.99</td><td>33.01</td></tr>
<tr><td>External Green within GIDC % (B/D)</td><td>0.00</td><td>7.00</td><td>7.00</td></tr>
<tr><td>Green Area % (C/D*100)</td><td>7.89</td><td>57.99</td><td>40.01</td></tr>
</table></td></tr>
<tr><td></td><td>viii. Stipulation of greenbelt outside the project premises such as avenue plantation, plantation in vacant areas, social forestry etc.</td><td>Additionally, 500 Sq.m (equivalent to 7% of plot area) Greenbelt will be developed within the GIDC Vatva Industries Association.</td></tr>
<tr><td></td><td>ix. Assessment of carrying capacity of transportation load on roads inside the industrial premises. If the roads required to be widened, shall be prescribed as a condition.</td><td>As the project is within the GIDC area and a Small Scale unit; this point is not applicable however transportation of goods is done in covered trucks.</td></tr>
<tr><td>Water conditions</td><td>i. Reuse/ Recycle of treated wastewater, wherever feasible</td><td>Water Consumption & Wastewater Generation
<table>
<tr><th>S.No.</th><th>Water Usage</th><th>Water Requirement</th></tr>
<tr><td>1</td><td>Domestic</td><td>2.4</td></tr>
<tr><td>2</td><td>Gardening</td><td>2</td></tr>
<tr><td>3</td><td>Process</td><td>68</td></tr>
<tr><td>4</td><td>Washing</td><td>5.2</td></tr>
<tr><td>5</td><td>Boiler</td><td>6</td></tr>
<tr><td>6</td><td>Scrubber</td><td>1</td></tr>
<tr><td></td><td>Total</td><td>84.6</td></tr>
</table>
Total Water Consumption: 84.6 KLD
Reuse Water: 26.87 KLD
Total Fresh Water Requirement: 58.73 KLD, Vatva GIDC
Total Gardening Water Consumption: 2 KLD
Total Domestic Waste Water Generation: 2.1 KLD.
Total Industrial Waste Water Generation: 85.33 KLD
25.87 KLD {Generated from manufacturing process of FC Acid, OAPSAMIDE, Sodium 5-amino-2-(4-aminoaniline) benzenesulfonate, HEGN Stage 2 }: will be reuse in manufacturing process at our premises.
Dil. HCl generated from scrubber 0.8 KLD shall be reused in manufacturing process of 4 ADAPSA & 4 NADAPSA.
Exhausted scrubbing media from scrubber attached with spray dryer 0.2 KLD shall be reused in next batch of same color.
Low concentrated effluent 7.3 KLD (Utility 0.6 KLD, washing 5.2 KLD, mfg. Process of 6-Chloro 4-Nap 1.5 KLD)"shall be</td></tr>
</table>

Environment	Mitigation Measures	Compliance Reply in Existing Phase
		treated in ETP-1 (Cap: 40 KLD) consists of primary, secondary and tertiary treatment units and treated effluent shall be sent to CETP, Vatva for further treatment & disposal. • High concentration effluent generated from manufacturing process 51.16 KlD shall be "treated in ETP-2 (Cap: 114KLD) consists of primary treatment units and treated effluent shall be sent to the common spray dryer of M/s Chhatral Environment Management system Pvt. Ltd., Dhanot for spray drying.
	ii. Continuous monitoring of effluent quality/ quantity in large and medium Red Category Industries (water polluting).	The plant falls under small category industries, hence installation of CEMS is not applicable.
	iii. A detailed Rainwater harvesting plan may be submitted by the project proponent	Currently, rainwater goes to GIDC drain
	iv. Zero liquid discharge wherever techno- economically feasible.	Since it is not feasible to adopt Zero Liquid Discharge (ZLD) Low Concentration Effluent generated from {6 KLD: Utility (0.6 Boiler & 5.2 Washing) + 1.3 KLD: Mfg. Process of 6-Chloro 4-Nap 1.5 KLD)} is treated in ETP (Cap- 40 KLD having Primary, Secondary & Tertiary Treatment Unit) and treated effluent shall be sent to CETP, Vatva for further treatment & disposal. High concentration effluent generated from manufacturing process 51.16 KlD shall be "treated in ETP-2 (Cap: 114KLD) consists of primary treatment units and treated effluent shall be sent to the common spray dryer of M/s Chhatral Environment Management system Pvt. Ltd., Dhanot for spray drying.
	v. In case, domestic waste water generation is more than 10 KLD, the industry may install STP.	Domestic sewage generation is 2.1 KLD and is treated in STP.
Land Conditions	i. Stipulation of greenbelt outside the project premises such as avenue plantation, plantation in vacant areas, social forestry, etc.	Additionally, 500 Sq.m (equivalent to 7% of plot area) Greenbelt will be developed within the GIDC Vatva Industries Association. Following are the coordinates: (i) Lat 22°58'23.99N Long 72°38'17.61" (ii) Lat 22°58'24.34N Long 72°38'18.42" (iii) Lat 22°58'17.19N Long 72°38'22.23" (iv) Lat 22°58'17.70N Long 72°38'22.79"
	ii. Dumping of waste (fly ash, slag, red mud, etc.) may be permitted only at designated locations	Not applicable

Environment	Mitigation Measures	Compliance Reply in Existing Phase
	approved by SPCBs/ PCCs.	
	iii. More stringent norms for management of hazardous waste. The waste generated should be preferably utilized in co-processing.	Hazardous waste management being followed are as under: 1. ETP Waste - Collection, storage, transportation, disposal at TSDF. 2. Used oil - Collection, storage, reuse, disposal by selling to registered recyclers. 3. Discarded containers & bags - Collection, storage, decontamination, reuse, transportation, disposal by selling to authorized recyclers. 4. Process waste (Iron Sludge) - Collection, storage, transportation and selling to Cement industries for Co-Processing 5. Spent Sulphonic Acid - Collection, storage, transportation, disposal by sending to NOVEL -1320 MT/Year and to actual end user having rule-9 permission - 4500 MT/Year 6. Spent hydrochloric acid (20-25%) – Collection, Storage & reuse in manufacturing process of 4 ADAPSA (96 MT /Y} & 4 NADPSA (264 MT/Y) at own premises 7. Spent Carbon - Collection, Storage, Transportation & send to Co-processing Unit.
Other Conditions	i. Monitoring of compliance of EC conditions may be submitted with a third party audit every year.	PP has submitted a GPCB authorized schedule II Environment auditor report. Latest compliance report submitted for October 2023 to March 2024.
	ii. The % of the CER may be at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental Clearance.	Unit has done CER activity as per below: In year 2022 – INR 5 Lakh In Year 2023 – INR 2.51 Lakh In year 2024 – we will do INR 7.49 Lakh CER Activity in this year. Note – Due to Covid in 2020-2021, Our plant is not in operational condition. So, there was some financial crises in Year 2020-2021. So, we have carried forward CER Activity of year 2020 & 2021 in year 2022, 2023 & 2024. We will undertake CER activities @ INR 15 Lakh till 2024, in terms of development of green belt in the near by schools and villages. The CER fund as 1.5% of the project cost is INR 15 Lakh. We have attached CER activity letter for INR 5 lakh. We will also provide details of CER activity letter/future action plan for remaining amount.

The committee was satisfied with the response provided by PP on above information. Further, Committee desired to submit the above information in writing. Accordingly, PP has submitted the desired information and EAC found the information/commitments satisfactory.

After detailed deliberation, the Committee recommended the proposal for amendment in EC subject to compliance of the following additional specific condition:

(i) A greenbelt of 5m – 10 m width must be developed by the PP along the periphery of each of these plots i.e., greenbelt shall be developed in 33% of plot area within the plant premises.

(ii) All the safety measures as well as approval required from other Authorities shall be obtained and implemented.

(iii) As proposed, PP shall comply with the following mitigation measures as Per Ministry's Office Memorandum 31st October, 2019 regarding Projects located in Critically Polluted Area.

<table>
<tr><th>Environment</th><th>Mitigation Measures</th><th>Compliance
Reply in Existing Phase</th></tr>
<tr><td></td><td></td><td>Compliance</td></tr>
<tr><td>Air Emissions</td><td>i. Stack emission levels should be stringent than the existing standards in terms of the identified critical pollutants.</td><td>Boiler- 2 TPH, One Number- Operational with a stack of height 15 m fitted with adequate stack height. Fuel used is PNG. Latest Best available Technologies are adopted in the Boiler design to limit PM emission within limits.</td></tr>
<tr><td></td><td colspan="2">
<table>
<tr><th>S.No.</th><th>Parameters</th><th>Unit</th><th>Results</th><th>Standard Permissible Limit as per EPA</th><th>Stringent Permissible Limit for CPA</th></tr>
<tr><td colspan="6">Process Gas Stacks Emission (Spray Dryer and Chloro Sulphonic Vessel) Results Range:</td></tr>
<tr><td>1</td><td>PM</td><td>mg/NM^3</td><td>74.6-76.8</td><td>150</td><td>120</td></tr>
<tr><td>2</td><td>SO_X</td><td>PPM</td><td>10.5-12.0</td><td>40</td><td>32</td></tr>
<tr><td>3</td><td>HCl</td><td>PPM</td><td>7.2-8.2</td><td>20</td><td>16</td></tr>
<tr><td colspan="6">Boiler Stack Emission Results (Flue Gas Stack)</td></tr>
<tr><td>1</td><td>PM</td><td>mg/NM^3</td><td>98.5-99.0</td><td>150</td><td>120</td></tr>
<tr><td>2</td><td>SO_X</td><td>PPM</td><td>10.5-13.5</td><td>100</td><td>80</td></tr>
<tr><td>3</td><td>NO_x</td><td>PPM</td><td>9.3-10.3</td><td>50</td><td>40</td></tr>
</table>
</td></tr>
<tr><td rowspan="2">Air Emissions</td><td>ii. CEMS may be installed in all large/ medium red category industries (air polluting) and connected to SPCB and CPCB server.</td><td>The plant falls under small category industries, hence installation of CEMS is not applicable.</td></tr>
<tr><td>iii. Effective fugitive emission control measures should be imposed in the process of</td><td>There is no use of solvent in the plant .
The plant is designed as such that fugitive emissions are controlled at source by selection of most suitable equipment and accessories</td></tr>
</table>

<table>
<tr><th>Environment</th><th>Mitigation Measures</th><th>Compliance
Reply in Existing Phase</th></tr>
<tr><td></td><td>transportation, packing etc.</td><td>● The process itself is a closed loop system, which eliminates fugitive emission.
● Use of special non-diffusing joint sealants for piping and equipment
● The traces of acidic/ volatile vapor generated in from any process vessels is sent to the Alkali scrubbers
● Mechanical seals for reactors, pumps; flange guards are in place; wherever possible magnetic coupled pump shall be used.
● Process: Use of closed loop systems is practiced in the process for arresting fugitive emissions. Charging of liquid & solid raw materials will be done under vacuum wherever necessary. All pumps are provided with mechanical seals to avoid leakages.
● Closed Packing system for finished product are installed.
● Valves and flanges preventive maintenance program is followed regularly. Regular monitoring of system for leaks.
● Mechanical integrity programme system is implemented.</td></tr>
<tr><td></td><td>iv. Transportation of materials by rail/ conveyor belt, wherever feasible.</td><td>Not Applicable</td></tr>
<tr><td></td><td>v. Encourage use of cleaner fuels (pet coke/ furnace oil/ LSHS may be avoided).</td><td>As per EC, PNG is used in the boilers equipped with adequate stack height and fuels like pet coke/ furnace oil/ LSHS are not used.</td></tr>
<tr><td></td><td>vi. Best Available Technology may be used. For example, usage of EAF/SAF/IF in place of Cupola furnace: Usage of Supercritical technology in place of sub-critical technology.</td><td>Not applicable</td></tr>
<tr><td></td><td>vii. Increase of green belt cover by 40% of the total land area beyond the permissible requirement of 33%, wherever feasible.</td><td>
<table>
<tr><th>Particulars</th><th>Existing(I)</th><th>New Plot(II)</th><th>After Plot addition (I) + (II)</th></tr>
<tr><td>Internal Green belt in sqm (A)</td><td>208.00</td><td>1877.00</td><td>2085.00</td></tr>
<tr><td>External Green belt in sqm (B)</td><td>0.00</td><td>500.00</td><td>500.00</td></tr>
<tr><td>Total Green belt in sqm (C = A + B)</td><td>208.00</td><td>2377.00</td><td>2585.00</td></tr>
<tr><td>Plot area in sqm (D)</td><td>2636.00</td><td>3681.00</td><td>6317.00</td></tr>
<tr><td>Internal Green % (A/D)</td><td>7.89</td><td>50.99</td><td>33.01</td></tr>
<tr><td>External Green within GIDC % (B/D)</td><td>0.00</td><td>7.00</td><td>7.00</td></tr>
<tr><td>Green Area % (C/D*100)</td><td>7.89</td><td>57.99</td><td>40.01</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Environment</th><th>Mitigation Measures</th><th>Compliance
Reply in Existing Phase</th></tr>
<tr><td></td><td>viii. Stipulation of greenbelt outside the project premises such as avenue plantation,plantation in vacant areas, social forestry etc.</td><td>Additionally, 500 Sq.m (equivalent to 7% of plot area) Greenbelt will be developed within the GIDC Vatva Industries Association. Following are the coordinates:
(i) Lat 22°58’23.99N Long 72°38’17.61”
(ii) Lat 22°58’24.34N Long 72°38’18.42”
(iii) Lat 22°58’17.19N Long 72°38’22.23”
(iv) Lat 22°58’17.70N Long 72°38’22.79”</td></tr>
<tr><td></td><td>ix. Assessment of carrying capacity of transportation load on roads inside the industrial premises. If the roads required to be widened, shall be prescribed as a condition.</td><td>As the project is within the GIDC area and a Small Scale unit; this point is not applicable however transportation of goods is done in covered trucks.</td></tr>
<tr><td>Water conditions</td><td>i. Reuse/ Recycle of treated wastewater, wherever feasible</td><td>Water Consumption & Wastewater Generation
<table><tr><th>S.No.</th><th>Water Usage</th><th>Water Requirement</th></tr><tr><td>1</td><td>Domestic</td><td>2.4</td></tr><tr><td>2</td><td>Gardening</td><td>2</td></tr><tr><td>3</td><td>Process</td><td>68</td></tr><tr><td>4</td><td>Washing</td><td>5.2</td></tr><tr><td>5</td><td>Boiler</td><td>6</td></tr><tr><td>6</td><td>Scrubber</td><td>1</td></tr><tr><td></td><td>Total</td><td>84.6</td></tr></table>● Total Water Consumption: 84.6 KLD
Reuse Water: 26.87 KLD
● Total Fresh Water Requirement: 58.73 KLD, Vatva GIDC
● Total Gardening Water Consumption: 2 KLD
● Total Domestic Waste Water Generation: 2.1 KLD.
Total Industrial Waste Water Generation: 85.33 KLD
● 25.87 KLD {Generated from manufacturing process of FC Acid, OAPSAMIDE, Sodium 5-amino-2-(4-aminoaniline) benzenesulfonate, HEGN Stage 2 }: will be reuse in manufacturing process at our premises.
● Dil. HCl generated from scrubber 0.8 KLD shall be reused in manufacturing process of 4 ADAPSA & 4 NADAPSA.
● Exhausted scrubbing media from scrubber attached with spray dryer 0.2 KLD shall be reused in next batch of same color.
● Low concentrated effluent 7.3 KLD (Utility 0.6 KLD, washing 5.2 KLD, mfg. Process of 6-Chloro 4-Nap 1.5 KLD)"shall be treated in ETP-1 (Cap: 40 KLD) consists of primary,</td></tr>
</table>

Environment	Mitigation Measures	Compliance Reply in Existing Phase
		secondary and tertiary treatment units and treated effluent shall be sent to CETP, Vatva for further treatment & disposal. • High concentration effluent generated from manufacturing process 51.16 KlD shall be "treated in ETP-2 (Cap: 114KLD) consists of primary treatment units and treated effluent shall be sent to the common spray dryer of M/s Chhatral Environment Management system Pvt. Ltd., Dhanot for spray drying.
	ii. Continuous monitoring of effluent quality/ quantity in large and medium Red Category Industries (water polluting).	The plant falls under small category industries, hence installation of CEMS is not applicable.
	iii. A detailed Rainwater harvesting plan may be submitted by the project proponent	Rainwater shall be collected in 10 KL RCC tank and the same shall be utilized for process or cooling tower make up.
	iv. Zero liquid discharge wherever techno- economically feasible.	Since it is not feasible to adopt Zero Liquid Discharge (ZLD) Low Concentration Effluent generated from {6 KLD: Utility (0.6 Boiler & 5.2 Washing) + 1.3 KLD: Mfg. Process of 6-Chloro 4-Nap 1.5 KLD)} is treated in ETP (Cap- 40 KLD having Primary, Secondary & Tertiary Treatment Unit) and treated effluent shall be sent to CETP, Vatva for further treatment & disposal. High concentration effluent generated from manufacturing process 51.16 KlD shall be "treated in ETP-2 (Cap: 114KLD) consists of primary treatment units and treated effluent shall be sent to the common spray dryer of M/s Chhatral Environment Management system Pvt. Ltd., Dhanot for spray drying.
	v. In case, domestic waste water generation is more than 10 KLD, the industry may install STP.	Domestic sewage generation is 2.1 KLD and is treated in STP.
Land Conditions	i. Stipulation of greenbelt outside the project premises such as avenue plantation, plantation in vacant areas, social forestry, etc.	Additionally, 500 Sq.m (equivalent to 7% of plot area) Greenbelt will be developed within the GIDC Vatva Industries Association.
	ii. Dumping of waste (fly ash, slag, red mud, etc.) may be permitted only at designated locations approved by SPCBs/ PCCs.	Not applicable
	iii. More stringent norms for management of hazardous waste. The waste generated should be preferably utilized in co-processing.	Hazardous waste management being followed are as under: 8. ETP Waste - Collection, storage, transportation, disposal at TSDF. 9. Used oil - Collection, storage, reuse, disposal by selling to

Environment	Mitigation Measures	Compliance
		Reply in Existing Phase
		registered recyclers. 10. Discarded containers & bags - Collection, storage, decontamination, reuse, transportation, disposal by selling to authorized recyclers. 11. Process waste (Iron Sludge) - Collection, storage, transportation and selling to Cement industries for Co-Processing 12. Spent Sulphonic Acid - Collection, storage, transportation, disposal by sending to NOVEL -1320 MT/Year and to actual end user having rule-9 permission - 4500 MT/Year 13. Spent hydrochloric acid (20-25%) – Collection, Storage & reuse in manufacturing process of 4 ADAPSA (96 MT /Y} & 4 NADPSA (264 MT/Y) at own premises 14. Spent Carbon - Collection, Storage, Transportation & send to Co-processing Unit.
Other Conditions	i. Monitoring of compliance of EC conditions may be submitted with a third party audit every year.	PP has submitted a GPCB authorized schedule II Environment auditor report. Latest compliance report submitted for October 2023 to March 2024.
	ii. The % of the CER may be at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental Clearance.	Unit has done CER activity as per below: In year 2022 – INR 5 Lakh In Year 2023 – INR 2.51 Lakh In year 2024 – we will do INR 7.49 Lakh CER Activity in this year. Note – Due to Covid in 2020-2021, Our plant is not in operational condition. So, there was some financial crises in Year 2020-2021. So, we have carried forward CER Activity of year 2020 & 2021 in year 2022, 2023 & 2024. We will undertake CER activities @ INR 15 Lakh till 2024, in terms of development of green belt in the near by schools and villages. The CER fund as 1.5% of the project cost is INR 15 Lakh. We have attached CER activity letter for INR 5 lakh. We will also provide details of CER activity letter/future action plan for remaining amount.

Any Other Item:

Agenda No. 92.2

Establishment of 3,00,000 KLPA capacity paint & 85000 TPA resins & emulsions manufacturing plant at GIDC Ankleshwar, Bharuch District, Gujarat by M/s. ASIAN PAINTS LIMITED - Corrigendum in Environmental Clearance

[Proposal no: IA/GJ/IND3/301555/2023, File No. IA-J-11011/278/2023-IA-II(I)]

1. The proposed proposal is for Establishment of 3,00,000 KLPA capacity paint & 85000 TPA resins & emulsions manufacturing plant at GIDC Ankleshwar, Bharuch District, Gujarat by M/s. ASIAN PAINTS LIMITED.
2. All products are listed at S.N. 5(h) Integrated paint industry of the Schedule of Environment Impact Assessment (EIA) Notification 2006 and amended from time to time.

   Reason for Amendment: During the submission of EIA and EC application, there was a typing error in "Capacity" Column. Inadvertently 2 Lakh Kcal/hr was mentioned instead of 20 Kcal/hr, although other details including the fuel consumption, basis which pollution load was calculated, is correctly mentioned i.e., 120 kg/hr.

3. The project proposal is now considered by the Expert Appraisal Committee (Industry-3) in its in its 92nd meeting held on 07-08th January 2025 wherein the Project Proponent **M/s. ASIAN PAINTS LIMITED** proposed the following corrigendum in the EC:

Details of Configurations					
S.no	**Plant/ Equipment/ Facility**	**Existing Configuration**	**Proposed Configuration**	**Final configuration after Corrigendum**	**Remarks if Any**
1	Thermic Fluid Heater - 4	2	20	20	Capacity (Lakh Kcal/hr)
2	Thermic Fluid Heater - 5	2	20	20	Capacity (Lakh Kcal/hr)
3	Thermic Fluid Heater - 3	2	20	20	Capacity (Lakh Kcal/hr)
4	Thermic Fluid Heater - 6	2	20	20	Capacity (Lakh Kcal/hr)
5	Thermic Fluid Heater - 1	2	20	20	Capacity (Lakh Kcal/hr)
6	Thermic Fluid Heater - 2	2	20	20	Capacity (Lakh Kcal/hr)

Any Other Corrigendum Required				
S. no	**Reference of Approved EC**	**Description as per Approved EC**	**Description as per Proposal.**	**Remarks**
1	SEIAA/GUJ/EC/5(h)/ 597/2018	Capacity of Thermic Fluid Heaters (6 Numbers) = 2	Capacity of Thermic Fluid Heater (6 Numbers) = 20	EC condition A. 3 Air 22

4. **Deliberations by the EAC:**

During presentation the Consultant namely M/s Kadam Enviro and Project Proponent informed the Committee that as desired by the Ministry, PP has not revised the project proposal from corrigendum to amendment in EC. Therefore, the PP now wants to withdraw the proposal. Revised proposal will be submitted on Parivesh 2.0.

Accordingly, the proposal was returned to the PP in its original form.

ANNEXURE-I

GENERAL EC CONDITIONS

- 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.
- The PP 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.
- The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
- 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).
- 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.
- 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.
- A copy of the clearance letter shall be sent by the PP 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.
- The PP shall also upload/submit six monthly reports on PARIVESH Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated 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.
- 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 Integrated Regional Office of MoEF&CC by e-mail.
- The PP 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.

- 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.
- 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.

***

Annexure-I

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

S. No.	Name of Member	Designation
1.	Prof. (Dr.) A.B. Pandit	Chairman
2.	Dr. Suresh Panwar	Member
3.	Dr. (ER.) Dibakar Swain	Member
4.	Dr. Kishore Malviya	Member
5.	Shri Amit Vashisht	Member
6.	Dr. P. Jagannadha Rao	Member
7.	Dr. Vijay S Moholkar	Member
8.	Shri A N Singh	Member Secretary
MoEFCC		
1.	Dr. Kanchan Puri	Scientist-B
2.	Dr. Bhawana Kapkoti Negi	Technical Officer

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

S. No.	Name of Member	Designation
1.	Prof. (Dr.) A.B. Pandit	Chairman
2.	Dr. Suresh Panwar	Member
3.	Dr. (ER.) Dibakar Swain	Member
4.	Dr. Kishore Malviya	Member
5.	Shri Amit Vashisht	Member
6.	Dr. P. Jagannadha Rao	Member
7.	Dr. Vijay S Moholkar	Member
8.	Shri A N Singh	Member Secretary
MoEFCC		
1.	Dr. Kanchan Puri	Scientist-B
2.	Dr. Bhawana Kapkoti Negi	Technical Officer

***

MoM approved by

(Prof. Aniruddha B. Pandit)
Chairman