No. J-11011/ 169/2005 – IA II (I)
Government of India
Ministry of Environment & Forests
I. A. Division

Plahujarai@yahoo.com
Tel : 2436 3973
Paryavaran Bhawan,
CGO Complex, Lodi Road,
New Delhi – 110 003

Dated the August 11, 2005

To

The Authorized signatory
M/s Nosch Labs Private Limited
201 & 202, Bhanu Enclave, 7-1-636 to 643/1,
Sunder Nagar,Erragadda, Hyderabad-500038
India

**Sub: Bulk Drug unit by M/s Nosch Labs Private Limited (formerly known as Sterling Biochemie Private Limited) at Gaddapotharam Village, Tehsil Jinnaram Mandal in Medak District in Andhra Pradesh – Environmental clearance – Reg.**

Sir,

This has reference to your letter no. nil dated 05.05.2005 on the above subject along with EIA /EMP report , questionnaire seeking environmental clearance and subsequent communication dated 9.8.2005 on the above project under the Environmental Impact Assessment Notification,1994.

2.0. The Ministry of Environment and Forests has examined your application along with EIA/ EMP report. It is noted that the proposal is for environmental clearance of bulk drug unit for manufacture of 2 TPM of Diclofenac Sodium. The unit is located in an area of 0.81 ha. in District Medak in Andhra Pradesh. Water requirement of 21.25 m3/d will be met from the bore water. The solid waste generated in the form of process sludge (0.072TPD) , ETP sludge (0.396TPD) and fly ash(2TPD) will be sent to the TSDF of Hyderabad Waste Management Project at Dundigal. Consents under the Air and Water Acts from Andhra Pradesh Pollution Control Board was obtained on 5.8.2004. Public hearing panel has considered the project in the meeting held on 12.4.2005. Cost of the Project is Rs.90.76 lakhs.

3.0. The Ministry of Environment and Forests hereby accords environmental clearance to the above project under EIA Notification dated 27th January, 1994 as amended subsequently, subject to strict compliance of the following conditions:

**A SPECIFIC CONDITIONS**

i) The gaseous emissions (SOx, NOx, NH3 & HCl) particulate matter from various process units shall conform to the standards prescribed by the concerned authorities form time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.

ii) Ambient air quality monitoring stations shall be set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the SPCB.

iii) For control of particulate emissions, boilers shall be provided with cyclone separators and stack height as per Central Pollution Control Board guidelines.

iv) Spent solvents shall be recovered as far as possible & recovery shall not be less than 95 percent. During purification process, solvent vapours are emitted from purification tanks as fugitive emissions. Action shall be taken to reduce the emission as far as possible. Use of toxic solvents like Methylene Chloride (M.C.) etc. shall be minimum. All venting equipment shall have vapour recovery system.

v) Industry shall switch over to aqueous based coating film in place of use of Methylene Chloride in coating operation, in a phased manner.

vi) Industry shall switch over to use of non halogenated solvents in place of halogenated solvents in a phased manner.

vii) The company shall undertake following Waste Minimization measures :-

- Metering and control of quantities of active ingredients to minimize waste.
- Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
- Use of automated filling to minimize spillage.
- Use of "Close Feed" system into batch reactors.
- Venting equipment through vapour recovery system.
- Use of high pressure hose for equipment cleaning, to reduce waste water generation.

viii.) Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.

ix) Effluent generation shall not exceed 6.146 m3/d. The effluent shall be segregated into high TDS and low TDS streams. The low TDS effluent after primary treatment and meeting the norms shall be sent to CETP. Due care shall be taken to prevent leakage of effluent while loading, unloading and transportation. Waste water manifest system shall be provided along with every tanker for proper handling of effluent. The high TDS effluent shall be evaporated in Forced Evaporator. The condensate shall be given biological treatment. The concentrate shall be recycled back to the process. The salt obtained after drying shall be disposed into secured land fill (TSDF) after packaging in HDPE bags. The domestic waste water shall be sent to the septic tank followed by the soak pit.

Shall be used in evaporati

x) Solid waste generated from the process shall be sent to TSDF of M/s Hyderabad Waste Management Project at Dundigal. Boiler ash shall be sold to the brick manufacturers.

xi) The company shall obtain permission from the State Ground Water Authorities for ground water drawl.

xii) The company shall develop rainwater harvesting structures to harvest the run off water for recharge of ground water.

xiii) Green belt shall be provided in an area of 0.32 ha. to mitigate the effects of fugitive emissions all around the plant. Development of green belt shall be as per the Central Pollution Control Board guidelines.

xiv) Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.

xv) The company shall undertake eco-development measures including community welfare measures in the project area for the overall improvement of the environment. The eco-development plan should be submitted to the APPCB within three months of receipt of this letter for approval.

**B. GENERAL CONDITIONS**

i. The project authorities shall strictly adhere to the stipulations made by the Andhra Pradesh State Pollution Control Board.

ii. At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.

iii. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.

iv. The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October, 1994 and January, 2000. Authorization from the SPCB shall be obtained for collection, treatment, storage, disposal of hazardous wastes.

v. The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2003. Authorization from the State Pollution Control Board must be obtained for collections/treatment/storage/disposal of hazardous wastes.

vi. The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules ,1989 viz. 75 dBA (day time) and 70 dBA (night time).

vii. The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA /EMP report.

viii. A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

ix. The project authorities shall earmark separate funds to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.

x. The implementation of the project vis-à-vis environmental action plans shall be monitored by Ministry's Regional Office at Bangalore/ SPCB/Central Pollution Control Board . A six monthly compliance status report shall be submitted to monitoring agencies. website

xi. The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://envfor.nic.in. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the Ministry's Regional Office at Bangalore.

xii. 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.

4.0. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.

5.0. The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.

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

(Dr. P. L. Ahujaral)
Director

Copy to :-

1. The Secretary, State Deptt. of Environment, Government of Andhra Pradesh, Mantralaya, Hyderabad.
2. The Chairman, Central Pollution Control Board, Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar, Delhi-110032.
3. The Chairman, Andhra Pradesh State Pollution Control Board, 2nd Floor, HUDA Complex, Maitrivaram , S.R.Nagar, Hyderabad- 500 038.
4. The Chief Conservator of Forests (Central), Regional Office (SZ), Kendriya Sadan, IVth Floor, E&F Wing, 17th Main Road, Koramangala, Bangalore-560034.
5. JS(CCI-I), Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi.- 110003.
6. Monitoring Cell, Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi- 110003.
7. Guard file.
8. Record file.
9. Monitoring file.

(Dr. P. L. Ahujaral)
Director

GOVERNMENT OF INDIA
Ministry of Environment and Forests
(Regional Office, Southern Zone)
Bangalore-34

# MONITORING REPORT

## PART I

F. No. EP/12.1/905/AP

| | | |
|---|---|---|
| 1 | Name of the projects | Bulk Drug unit by M/s Nosch Labs Pvt. Ltd (formerly known as Sterling Biochemie Private Limited) at Gaddapotharam Village, Tehsil Jinnaram Mandal in Medak District in Andhra Pradesh. |
| 2 | Clearance letter No.& date | J-11011/169/2005-IA.II (I) dt:11-08-2005 |
| 3 | Location: District & State / UT | Gaddapotharam Village, Tehsil Jinnaram Mandal in Medak District in Andhra Pradesh |
| 4 | Address for correspondence: | Ch. Sasidhar Reddy (Manager- Liaison)<br>Sy.No.14, Gaddapotharam(V), IDA, Kazipally,<br>Jinnaram(M), Medak (D)-502319<br>Phone: 9848664638<br>E-mail: hr@noschlabs.net |
| 5 | Date of site visit for this report | 04-10-2013 |
| 6 | Date of previous visit(s) if any | -- |
| 7 | Brief on the project along with the present status: | |

The site visit to this Bulk Drug unit was carried out along with Ch. Sasidhar Reddy, Manager-Liaison of the unit and Ms.Sangeetha Lakshmi of APPCB Assistant Engineer Regional office Ramachandrapuram and other officers of the unit.

Nosch Labs Private Limited established this Bulk drug manufacturing unit in the year 2001 and obtained post facto Environmental clearance from Ministry of Environment to manufacture, initially Diclofenac Sodium with a capacity of 24.0 TPA in a total area of 11,330 Sq. Mts. The unit obtained CFO from A.P. Pollution Control Board in September 2012 with change of product mix and is valid up to 31.03.2015. Now the unit is proposed to expand its capacity from the current 24.0 TPA to 100.0 TPA using existing infrastructure. The product mix has changed after obtaining their clearance and their current products and production levels are as follows:

| S.No | Products as per CFO of the Board | Authorized quantity as per CFO in TPA | Actual production Aug 2012 -Mar 2013 in TPA |
|---|---|---|---|
| 1 | Enalapril Maleate | 18.0 | 0.472 |
| 2 | Omeprazole | 24.0 | 0.969 |
| 3 | Lansoprazole | 24.0 | 3.841 |
| 4 | Itraconazole | 19.8 | 1.928 |

| | | | |
|---|---|---|---|
| 5 | Pantoprazole Sodium | 24.0 | 3.240 |
| 6 | Olanzapine | 22.2 | 0.997 |
| 7 | Rabiprazole Sodium | 24.0 | 0.981 |
| 8 | SibutramineHcl | 24.0 | 0.000 |
| 9 | QuetiapineHemifumarate | 10.2 | 3.199 |
| 10 | Tamsulosin Hydrochloride | 24.0 | 0.045 |
| 11 | Sumatriptan Succinate | 24.0 | 0.596 |
| 12 | Esomeprazole Magnesium | 24.0 | 5.430 |
| | Total production capacity | 24.0 (Any one product) | 21.698 |

As per the information provided the unit is permitted to discharge 1.9 KLD of process & wash effluents, 1.5 KLD of effluents from utilities and domestic. Currently the High TDS Effluents are stripped for organics recovery, stripped condensate to distillate followed by disposal to cement plants for Co-Processing. Stripped effluents are sent to FE in the double effect evaporator and stand by FE Reactor. FE Condensate to reuse or CETP, Patancheru and low TDS effluents along with domestic effluents are send to CETP, Patancheru. It was informed that the unit is meeting discharge limits as monitored by the PCB. It was informed that they are proposing to establish Zero Liquid Discharge facility to completely recycle the effluents within the plant along with the expansion project. Regarding the Hazardous Wastes handling, Salts obtained from their forced evaporation system, Inorganic and Effluent neutralization facilities are sent to TSDF facilities. Spent carbon and Process Organic residues, ETP Sludge and Mixed Solvents are being sent to either TSDF, or cement industries. Dedicated hazardous waste storage shed is provided. The unit has necessary scrubbers for their process and stacks with cyclone separator for controlling their air pollution. It was informed that an Investment of Rs. 1.0 Crore was made on environmental infrastructure and it is proposed to add additional Rs. 1.0 Crore along with their expansion project. They have developed some greenery; it was informed that in the total plant area of 11330 square meters, in 3400 Sq. m green belt is provided.

The A.P. Pollution Control Board in the year 2007 issued general directions to all the units in the area including this unit vide Order No.45/PCB/RO-II/RCP/MDK/07-1212, dt.16.06.2007 and their compliance report states that they have complied with most of the directions. They have also produced more than their permitted quantity and different products, which are not consented earlier. The six monthly compliance reports are not submitted to the regional office. They have not communicated their progress to the regional office of the Ministry and the regional office was not having a record of this unit all these years. Now, this visit was made, since they have requested the regional office for providing a compliance report with a copy of their environmental clearance. It was observed that they need to improve their compliance status. During the visit it was informed that the unit is improving their compliance status now and now onwards assured to submit their compliance reports on time.

This report is filed on the basis of the field visit and as per the information provided by the project authority. Detailed point wise compliance status is given below in part II and III.

(Dr U. Sridharan)
Scientist "SF"

## PART-II

Status of compliance to the Environmental clearance issued by the MoEF for the Bulk Drug unit by M/s Nosch Labs Pvt. Ltd (formerly known as Sterling Biochemie Private Limited) at Gaddapotharam Village, Tehsil Jinnaram Mandal in Medak District in Andhra Pradesh issued vide Ref: J-11011/169/2005-IA.II (I) dt:11-08-2005

Compliance status in brief:

| No | SPECIFIC CONDITIONS | Compliance |
|---|---|---|
| 1 | The gaseous emissions and particulate matter shall conform to the standards. | Being complied |
| 2 | Ambient air quality monitoring stations shall be set up | Complied |
| 3 | Control of particulate emissions, scrubbers and dust collector shall be provided | Being complied |
| 4 | Spent solvents be recovered & recovery shall not be less than 95 percent | Being complied |
| 5 | Industry shall switch over to aqueous based coating film. | Not applicable |
| 6 | Industry shall switch over to non halogenated solvents. | Agreed to comply |
| 7 | The company shall undertake necessary Waste Minimization measures. | Being complied |
| 8 | Fugitive emission control in work environment | Being complied |
| 9 | Waste water treatment measures | Being complied |
| 10 | Solid waste including hazardous waste to be disposed properly. | Being complied |
| 11 | Industry shall obtain permission from State Ground water Authority | Agreed to comply |
| 12 | Shall develop rainwater harvesting system to harvest the runoff water | Not permitted |
| 13 | Green belt shall be developed in an area of 0.32 ha | Being complied |
| 14 | Occupational health surveillance of the workers shall be done on regular basis | Being complied |
| 15 | Eco development measures | Being complied |
| | GENERAL CONDITIONS | |
| 1 | Shall strictly adhere to the stipulations made by the KSPCB | Agreed to comply |
| 2 | At no time, the emissions shall exceed the prescribed limits. | Agreed to comply |
| 3 | No further expansion or modifications without prior approval | Agreed to comply |
| 4 | The project authorities shall strictly comply with the MSIHC & HW rules. | Being complied |
| 5 | The project authorities must strictly comply with the HW rules | Being complied |
| 6 | Overall noise levels shall be kept well within the standards (85 dBA) | Being complied |
| 7 | Comply with all the environmental protection measures of EIA /EMP report | Agreed to comply |
| 8 | Separate Environmental Management Cell shall be set up. | Stated Complied |
| 9 | Necessary funds for environmental pollution control measures | Being complied |
| 10 | Six monthly compliance status reports shall be submitted | Not Complied |
| 11 | News paper advertisement about the environmental clearance | Not Complied |
| 12 | Inform the regional office about the date of start of project | Ongoing unit |

## Part-III

### A SPECIFIC CONDITIONS

1. *The gaseous emissions ($SO_2$, $NO_x$, HCl, $H_2S$ and Acid mist) and particulate matter from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.*

The Sources of emissions are 2 TPH coal fired boiler, 1 X 365 KVA, 1 X 415 KVA capacity DG sets. SPM, SO2, NOx levels are monitored from these sources, NH3 & HCl emissions from the process are scrubbed. Their monitoring report shows the parameters are well within the norms.

2. *Ambient air quality monitoring stations shall be set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the SPCB*

The project authorities are engaging outside party to carry out ambient air quality and PM 10, PM 2.5, Sox, NOX are monitored. Their latest analysis reports provided during the visit shows that the values are within the Standards. It was told that monitoring of fugitive VOC's at different places in the premises are under process.

3. *For control of particulate emissions, boilers shall be provided with bag filters and stacks height as per the Central Pollution Control Board guidelines.*

The project authorities have provided a stack height of 30 mts height for their 2 TPH Boiler with cyclone separators for control of particulate emissions.

4. *Spent solvents shall be recovered as far as possible & recovery shall not be less than 95 percent. During purification process, solvent vapours are emitted from purification tanks as fugitive emissions. Action shall be taken to reduce the emissions as far as possible. Use of toxic solvents like Methylene Chloride (M.C.) etc. shall be minimum and Benzene shall be replaced with alternate solvents. All venting equipment shall have vapour recovery system*

It was informed that they recover all their spent solvents and reuse recovered solvents wherever permitted as per regulatory norms. Solvent distillation is carried out in closed system with condenser supplied with chilled brine. The vent of the storage tanks are connected to water seal pot. These measures have helped them for reducing fugitive emissions. It was informed that they are not using any toxic solvents like Methylene chloride. Vent line is connected to condenser, wherever required.

5. *Industry shall switch over to aqueous based coating film in place of use of Methylene Chloride in coating operation, in a phased manner.*

It was informed that their unit is a Bulk Drug unit and there will be no coating process in the manufacturing process

6. *Industry shall switch over to non-halogenated solvents in place of halogenated solvents in a phased manner*

It was informed that they are complying with this condition; right now less toxic chloroform is the only halogenated solvent in use as per the process demands and however the quantity has been drastically reduced.

7. *The company shall undertake the following waste minimization measures.*

- *Metering and control of quantities of active ingredients to minimize waste.*
- *Reuse of by-products from the process as raw materials or as raw material substitutes.*
- *Use of automated filling to minimize spillage.*
- *Use of Close feed system into batch reactors.*
- *Venting equipment through vapour recovery system.*
- *Use of high pressure hoses for equipment cleaning to reduce wastewater generation.*

It was informed that they are implementing several waste minimization measures like flow meter for pumping solvents and liquids; digital weighs have been provided for weighing the solid / powdered raw materials to minimize the wastage; continuously doing R&D for the possibilities of reuse by-products as raw materials or raw material substitutes in other processes; using closed feed system of solvents and liquid raw materials into batch reactors and they are using high pressure jets for cleaning equipment.

8 *Fugitive emissions in the work zone environment, product, and raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.*

It was informed that they are monitoring the fugitive emissions in the work zone environment and values are within the limits.

9. *The effluent generation shall not exceed 6.146 $m^3$/day the effluent shall be segregated into high TDS and low TDS streams. The low TDS effluent after primary treatment and meeting the norms shall be sent to CETP. Due care shall be taken to prevent leakage of effluent while loading, unloading and transportation. Waste water manifest system shall be provided along with every tanker for proper handling of effluent. The high TDS effluent shall be evaporated on forced evaporator. The condensate shall be sent ETP. The concentrate shall be dried in evaporator. The salt obtained after drying shall be disposed into secured land fill (TSDF) after packaging in HDPE bags. The domestic waste water shall be sent to the septic tank followed by soak pit.*

It was informed that their effluent generation quantity has not exceeded and the industry has segregated the effluents into low TDS and high TDS streams. The High TDS effluents are processed in the RO plant and the waste water from the RO plant is evaporated in the FE. The Low TDS (1.5 KLD) streams are segregated, treated and disposed to CETP, Patancheru with manifest system. Average Wastewater discharge disposed to CETP in the last 12 months is 1314 KL/ annum.

10. *Solid wastes generated from ETP sludge and process sludge shall be sent for disposal to the common secured land fill site of M/s Hyderabad Waste Management Project. Boiler ash shall be sold to bricks manufacturers.*

It was informed that as per directions from the APPCB, solid waste generated in the form of sludge is sent to TSDF, Dundigal, solid waste generated in the form of process residue and activated spent carbon is disposed to TSDF, Dundigal for secure disposal or cement units for co-processing. Average Disposal of Hazardous wastes to TSDF for past 12 months are 143.8 TPA.

*11. The company shall obtain permission from State Ground Water Authority for the drawl of ground water.*

The project authorities have informed that they have noted and will comply with the condition at the time of ground water drawl and will obtain permission from State Ground Water Authority for the drawl of ground water.

*12. The company shall develop rainwater harvesting system to harvest the run off water for the recharge of ground water*

The project authorities have informed that in their industrial area it was not allowed to develop rain water harvesting structures for Rain water harvesting.

*13. Green belt shall be provided in area of 0.549 ha to mitigate the effects of fugitive emissions all around the plant. Development of green belt shall be as per the Central Pollution Control Board guidelines*

The project authorities have developed some Greenery within their plant. The total plant area is 11,330 square meters; out of which they have provided a green belt in 3,400 Square meters.

*14. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.*

It was informed that all the employees (143 Nos) are covered under Occupational health surveillance, regular Medical check-ups are being carried out for plant personnel once in Year as per A.P. Factories Rules, 1950 61(SC) A and the records are maintained.

*15. The company shall undertake eco-development measures including community welfare measures in the project area for the overall improvement of the environment. The eco-development plan should be submitted to the APPCB within three months of receipt of this letter for approval*

It was informed that they are providing Rs. 2.5 lakhs per year for schools, village development for roads and water and some amount was given to ESR cell of Medak District. However no eco development plan was submitted to APPCB.

B. **GENERAL CONDITIONS**

*1. The project authorities shall strictly adhere to the stipulations made by the Andhra Pradesh Pollution Control Board.*

It was informed that they are strictly adhering to the stipulations made by the Andhra Pradesh State Pollution Control Board it was assured that they will not violate the norms prescribed by the Board.

2. *At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.*

It was assured that in the event of failure of any pollution control systems, they will put off the operations and will not restart until the desired efficiency of the Control equipment is achieved.

3. *No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.*

Agreed to comply and assured that no further expansion or modifications in the plant will be carried out without prior approval of the Ministry of Environment and Forests. It was informed that they are planning for an expansion of their project for which they have requested the MoEF Regional Office for a report on the compliance to the existing EC conditions.

4. *The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October 1994 and January 2000. Authorization from the KSPCB shall be obtained for collection, treatment, storage, and disposal of hazardous wastes.*

It was informed that they are complying with Hazardous Chemicals Rules and obtained Authorization from the SPCB for collection, treatment, storage, and disposal of hazardous wastes as per Hazardous waste Rules.

5. *The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2003. Authorization from the State Pollution Control Board must be obtained for collections/treatment/storage/disposal of hazardous wastes.*

It was informed that they are complying with the Hazardous Wastes rules and regulations with regard to handling and disposal of hazardous wastes and obtained Authorization from the SPCB for the same.

6. *The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).*

It was informed that they are keeping the noise levels within limits and they are regularly monitoring the Ambient Noise Levels at different locations of the industry and the noise level is well with in the stipulated standards

7. *The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA /EMP report*

The project authorities have agreed to comply with the measures & safeguards as mentioned in their EIA/EMP.

8 *A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.*

It was informed that they have provided dedicated environmental team for their Environment Health and Safety. However details of the functioning of their environment cell were not provided during the visit. It was told that they have outsourced emissions testing through MEOF approved laboratory.

9 *The project authorities shall earmark separate funds to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.*

It was informed that they have necessary funds for environmental management and the funds are being utilized only for environmental, Health & Safety purposes and the annual budget for maintenance of environmental infrastructure and for disposal of wastes is Rs. 50.0 Lacks.

10 *The implementation of the project vis-à-vis environmental action plans shall be monitored by Ministry's Regional Office at Bangalore / APPCB / CPCB. A six monthly compliance status report shall be submitted to monitoring agencies.*

The project authorities are not submitting their compliance & monitoring reports. They have assured to send the reports periodically every six months.

11 *The project proponent shall inform the public that the project has been accorded environmental clearance advertising at least in two local newspapers.*

It was informed that they have already advertised in two local news papers however a copy was not made available during the visit.

12 *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.*

The project authorities have informed that their unit is an already existing unit and went in for their expansion and hence this condition is not applicable to them.

(Dr U. Sridharan)
Scientist 'SF'