

Point wise compliance status to various stipulations laid down by the Government of Maharashtra as per the Environmental Clearance issued vide File no.: J-11011/111/2011-1A II (I) dated 22nd March 2013

Sr. No.	Condition	Status
A.	SPECIFIC CONDITIONS	
i.	National Emission Standards for Pesticides Manufacturing and Formulation Industry issued by the Ministry vide G.S.R. 46 (E) dated 3 rd February, 2006 and amended time to time shall be followed by the unit.	We regularly monitor our emissions against standards by appointing third party assessment being done by approved MoEF accredited lab on quarterly basis and data is maintained with EHS team in factory. Necessary actions are taken by EHS based on the results. Refer Annexure no. 18 attached are Monitoring reports.
ii	Bag filter along with adequate stack height shall be provided to coal fired boiler to control the particulate matter emission within 50 mg/m ³	Agreed to comply with refer Photograph of the same attached as Annexure no. 17.
iii	Two stage scrubbing system shall be provided to process vent to control HCN emissions. The scrubbed water shall be sent to ETP for further treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. Scrubber vent shall be provided with on-line detection and alarm system to indicate higher than permissible standards. The system shall be interlocked with the pollution control equipments so that in case of any increase in pollutants beyond permissible limits, plant shall be automatically stopped. Stack monitoring shall be done regularly and report shall be submitted to Maharashtra Pollution Control Board (MPCB) and the Ministry's regional office at Bhopal.	We have been granted Environment clearance for total 7 products. Out of which we have started with only 3 products. We have started with only three productsie 2, 4 DMA salt, 2-Ethyl 2-Methyl Butanoic Acidand siduron only. H2So4 scrubbing system is provided to DMA. Water scrubbing is not required for above products. The Detection system is based on pressure mechanism and same is explained in detailed Scrubber drawing attached as

		Annexure no. 23. Stack monitoring report is attached and is regularly done on quarterly basis from accredited MoEF Accredited lab.
iv	In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials; multi cyclone separator and water sprinkling system. Dust areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored and records maintained. The emissions shall conform to the limits stipulated by the MPCB.	Fugitive emissions are controlled by different methods adopted at factory premises. Good housekeeping is followed at all levels. Factory premises are having different zone segregation like storage area of raw materials and final goods, Plant area, Boiler area, DG area etc. Whole premises are covered with Fire and Sprinkling system as per industry standards. Refer Photographs attached as Annexure no. 17.
V	For further control of fugitive emissions, following steps shall be followed:	
i	Closed handling system shall be provided for chemicals.	Yes. The fugitive emission control is provided by cone roof storages with vent condenser system and tanks designed as per IS 803 and 2825.
ii	Reflux condenser shall be provided over reactor.	Agreed to comply with.
iii	System of leak detection and repair of pump/pipeline based on preventive maintenance.	Mechanical seal is provided to all pump and taken in a regular Preventive maintenance schedule.
iv	The aids shall be taken from storage tanks to reactors through closed pipeline. Storage tanks shall be vented through trap receiver and condenser operated on chill water.	The transport of most chemicals from storage tanks to reactors is through closed pipeline. Acid transportation through closed pipeline and condenser operated on chilled water.

	v	Cathodic protection shall be provided to the underground solvent storage tanks.	No underground storage tanks are proposed in current project.
vi		A proper Leak Detection and repair (LDAR) Program for pesticide industry shall be prepared and implemented as per CPCB guidelines. Focus shall be given for prevention of fugitive emissions for which preventive maintenance of pumps, valves, pipelines are required. Proper maintenance of mechanical seals of pumps and valves shall be given. A preventive maintenance schedule for each unit shall be prepared and adhered to.	EHS department has prepared the Emergency preparedness plan and disaster management plan as per the guideline. They have identified different scenarios and accordingly the maintenance schedule is prepared. The responsibility matrix chart is also identified and followed at all level. The fugitive emissions are controlled as per industrial good practices.
vii		Chilled brine circulation system shall be provided to condensate solvent vapors and reduce solvent losses. It shall be ensured that solvent should not be less than 95%.	Condenser operated on chilled water. This ensures the recovery of solvent more than 95%.
viii		The gaseous emissions from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.	1 no. of DG of 500 KVA is proposed to be installed at factory premises as a power back up for running all emergency equipments and some critical reactions to continue till the reaction gets completed and stabilized. The stack height for proposed DG will be calculated as per CPCB standards. Express feeder is giving continuous electrical supply without interruption. Acoustic enclosure is in built. Refer Annexure no. 25 for DG technical back up.
ix		The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of	The Company is regularly doing monitoring at site for the PM10, SO2, NOx, VOCs, CO and HC (Methane and Non - methane) in ambient air

		CPCB and the MPCB. The levels of PM10, SO ₂ , NO _x , VOCs, CO and HC (Methane and Non - methane) in ambient air and emissions from the stacks shall be monitored and displayed at a convenient location near the main gate of the company and at important public places.	and emissions from the stacks. The same is displayed at Gate of the company. We are doing periodic monitoring at site i.e. at every quarter through MoEF approved laboratory. The results are maintained with EHS team. Refer Photograph of display board as Annexure no. 17.
X		Total water requirement from MIDC water supply not exceed 134 m ³ /day and prior permission shall be obtained from the concerned Authority. No ground water shall be used.	Agreed to comply with we are not using any ground water. MIDC water supply is obtained to the factory premises. Refer Annexure no. 8 Letter from MIDC regarding Water Supply connection.
xi		As proposed, industrial effluent generation shall not exceed 134 m ³ /day. Effluent shall be segregated into High TDS and low COD/TDS effluent streams. High TDS effluent stream shall be treated through stripper followed by MEE. Condensate will be treated in secondary and tertiary treatment. Low recycled/reused within the factory premises. Water quality of treated effluent shall be monitored regularly and monitoring report shall be submitted to the MPCB.	As of now we have not started with all products and the products with which we have started are not having any process effluent discharge. We have proposed ETP as per the guideline given in EC and as mentioned in our EIA report. The same is proposed to be constructed in factory premises. The area is already allotted for the same. Refer Annexure no. 12 for Proposed ETP details.
xii		No effluent shall be discharged outside the premises and 'Zero' discharge concept shall be adopted.	Agreed to comply with.
xiii		Process effluent / any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	Yes. Agreed to comply with Storm water lines and Effluent carrying drains will be separate and no mixing is allowed.
xiv		Hazardous chemical shall be stored in tanks in tank farms, drums, carboys etc. Flame arresters shall be	Flame arrester is provided on tank farm. Solvent

		provided on tank farm. Solvent transfer shall be by pumps.	transfer is by pump. Separate storage area is provided.
xv		The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date from management of Hazardous wastes and prior permission from MPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. Measures shall be taken for firefighting facilities in case of emergency. Membership of TSDF for hazardous waste disposal shall be obtained.	Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date from management of Hazardous wastes and prior permission from MPCB is obtained for disposal of solid / hazardous waste in the TSDF. Refer Annexure no. 13 CHWTSDF Membership Letter.
xvi		As proposed, ETP sludge, process water & residues shall be sent to TSDF site. High calorific value waste such as spent organic shall be incinerated.	Agreed to comply with.
xvii		Fly ash shall be sent to brick manufactures and tie-up to be made with brick-manufacturer.	Agreement with brick manufacturer is done for Fly ash disposal. Refer Annexure no. 7.
xviii		The company shall strictly comply with rules and guideline under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 11989 as amended in October, 1994 and January, 2000. All Transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	Agreed to comply with.
xix		The Company shall undertake following waste minimization measures:-	
	A.	Metering and control of quantities of active ingredients to minimize waste.	Metering and control of quantities of active ingredients is already done at site.
	B.	Reuse of by-products from the process as raw material substitutes in other processes.	Noted.
	C.	Use of automated filling to minimize spillage.	Already done at site.
	D	Use of Close Feed system into batch reactors.	We have Close Feed system for batch

			reactors.
	E.	Venting equipments through vapour recovery system.	Vent condenser system is given.
	F.	Use of high pressure hoses for equipment clearing to reduce wastewater generation.	Agreed to comply with.
xx		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.	Refer Annexure no. 9 for Fire Hydrant layout. Also refer the Fire NOC obtained from MIDC attached as Annexure no. 10.
xxi		Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Yearly physical fitness and Pathological analysis of worker's Blood sample is carried out. Quarterly Form 22 for Physical fitness is ensured by EHS team. We also have visiting doctor appointed for regular 2 visits per week. Also we have full time male nurse for general shift. Refer Annexure no. 22 for Sample copy of Form 22.
xxii		Green belt shall be developed at least in 33% of the plant area in and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Thick greenbelt with suitable plant species shall be developed around the proposed pesticide unit to mitigate the odour problem. Selection of plant species shall be as per the CPCB guidelines.	We have planted different native species all around the compound wall of factory premises. Also Middle RG area is under development of Green belt.
xxiii		Provision shall be made for the housing for the construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, crech etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact	No construction labour housing is proposed. The construction labor was outsourced from local contractor and they come to site on daily basis as they were from nearby area.

		on the surrounding environment.	
B.	GENERAL CONDITIONS:		
	i	The project authorities shall strictly adhere to the stipulations made by the Maharashtra Pollution Control Board.	Yes Agreed to comply with.
	ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alternations 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 with.
	iii	The location of ambient air quality monitoring stations shall be decided in consultation with the MPCB and it shall be ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Yes. We are proposing ambient air quality monitoring station in consultation with MPCB as per the guideline given in EC.
	iv	The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures. Refer Monitoring reports attached as Annexure no. 18.
	v	The company shall harvest rainwater from the roof-tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	Yes. Agreed to comply with we will utilize the same water for cooling tower.
	vi	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic wastewater and storm water drains.	Yes. Agreed to comply with.
	vii	Usage of Personnel Protection Equipments by all employees/ workers shall be ensured.	The factory workers working in different sections are given with PPE as per the need of the location and hazard surrounding them. Helmet, Shoes and Goggles

			are mandatory to all factory workers. Dust masks and hand gloves are given to workers working in dust particle area. For corrosive handling unit workers, we have provided Body suit and breathing mask too.
	viii	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre – employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Refer Annexure no. 21 Format of Induction training Module prepared by EHS department. We also celebrate Safety week on 4th march to 10th march of every year. Safety drill and mock drill during first week of every month is conducted for different section worker and contractors.
	ix	The company shall also comply with all the environmental protection measures and safeguards proposed in the project report submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.	All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing relating to the project are taken into consideration and being implemented.
	x	The company shall undertake CSR activities and all relevant measures for improving the socio – economic condition of the surrounding area.	Refer Annexure no. 26 for CSR activities conducted in last year.
	xi	The company shall undertake eco – development measures including community welfare measures in the project area for the overall improvement of the environment.	Agreed to comply with.
	xii	A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	Refer Annexure no. 19 for the structure identified for Environmental management cell. The cell is supported by third party assessment by MoEF accredited Environment consultant and accredited laboratory services for Monitoring.

xiii	<p>The company shall earmark sufficient funds for recurring cost per annum 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 earmarked for environment management / pollution control measures shall be not diverted for any other purpose.</p>	<p>Refer Annexure no. 20 for Budgetary Provision earmarked for Environment management Plan.</p>
xiv	<p>A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parisad / Municipal Corporation, Urban local Body and the local NGO, if any, from who suggestions / representations, if any, were received while processing the proposal.</p>	<p>Agreed to comply with.</p>
xv	<p>The project proponent shall be also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the Maharashtra Pollution Control Board. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.</p>	<p>This is December 2017 Six monthly compliance report as per the stipulated Environmental Clearance conditions including results of monitored data.</p>
xvi	<p>The Environmental statement for each financial year ending 31st March in Form – V as is mandated shall be submitted to the UP 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 be also be sent to the Bhopal Regional Offices of MoEF by e-mail.</p>	<p>Agreed to comply with.</p>
xvii	<p>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 issues of the clearance letter, at least in two local newspaper that are widely circulated in the region of which circulated in the region of which one shall</p>	<p>Agreed to comply with</p>

		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.	
	xviii	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.	Agreed to comply with
8.0		The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Agreed to comply with
9.0		The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Agreed to comply with
10.0		The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, The Environment (Protection) Act, 1986 Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Agreed to comply with