

Period: April 2023 to September 2023

Project: Expansion in manufacturing plant of 'synthetic organic chemicals' [API and API intermediate]

Sr.	Condition	Compliance		
No.				
A. Conditions				
A.1 S	Specific Condition:			
1	PP shall comply conditions of any	Noted and compliance assured.		
	subsequent amendment or expansion			
	or change in product mix, after the 30 th			
	March 2021, considered as per the			
	provisions in force at that time as			
	mentioned in the Notification vide S.O.			
	1223 (E) dated 27/03/2020 and S.O.			
	3636 (E) dated 15/10/2020.			
2	PP shall carried out proposed	Noted and compliance assured.		
	project/activities in respect of Active			
	Pharmaceutical Ingredients (API) as per			
	the amended EIA Notification vide S.O.			
	1223 (E) dated 27/03/2020 and any			
	subsequent amendments.			
3	PP shall submit six monthly compliance	Complied.		
	report of Environmental Clearance	We assure to regularly submit half-yearly compliance report in respect of the stipulated		
	without fail and the same shall be	prior environmental clearance terms and conditions.		
	critically assessed by the regulatory			
	authority.			



Sr.	Condition	Compliance
No. 4	Waste water shall be fed in-house MEE only after providing adequate treatment in such a way that no pollutant get air borne during evaporation to avoid adverse impact on Human Health & Environment.	Noted and will be complied. The MEE is under commissioning stage during report period and necessary precautions have been taken.
5	Close loop solvent recovery system with adequate condenser system shall be provide to recover vapors in such a manner that recovery shall be maximum and recovered solvent shall be reused in the process within premises.	Noted and will be complied for proposed project. Solvent recovery system has been already installed for existing project. All the reactors are equipped with vents/stacks, which are connected to either vapor recovery system consisting of condensers to get the maximum recovery, ejector/vacuum pumps and/or scrubbers. Recovered solvent is being reused in the process within premises.
6	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines, LDAR Logbook shall be maintained.	Noted and compliance assured. We have installed Distributed Control System (DCS) for close loop automated transferring of materials. We have provided vapor recovery system with adequate capacity of condenser with chilled brine cooling to recover the maximum solvent. Solvent pumps are provided with mechanical seals and LDAR covered under procedure of preventive maintenance system.
7	PP shall maintain Complete Zero Liquid Discharge (ZLD) status all the time after expansion and there shall be no drainage connection from the premises and no waste water discharge outside	Noted and will be complied. with as the ZLD system is under commissioning stage during the report period. Effluent is sent to ETP of Atul Ltd for treatment as per earlier EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009.



Sr. No.	Condition	Compliance
110.	premises by any means.	
8	The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.	Noted and complied. Presently, we are using captive facilities of Atul Ltd as per point 5 of EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009. We have also obtained membership of SEPL for integrated common hazardous waste management facility which is valid up to 24/03/2027 and the same is attached for your ready reference. Providence is a substitute of the same is the same in the same is attached for for your ready reference. Providence is not considered to the same is the same in the same is attached for your ready reference. Note the same is a substitute of the same is the same in the same is the same in the same is the same is the same in the same is the same in the same is the same in the same in the same is the same in the same in the same in the same is the same in the
9	PP shall obtain raw water permission for explanation project from competent authority before start expansion production activity.	Noted and compliance assured. Water required for the proposed expansion project is being obtained from River water (Par River). Necessary permission is already obtained.
10	PP shall not dig bore well within premises as per details submitted by PP and shall abstract raw water from ground water source, l.e. bore well within premises after obtain permission from CGWA.	Noted and compliance assured. There is no ground water source (bore well or any) within industry premises.
11	PP shall strictly adhere and complying agreement made by PP for power and steam requirement for proposed project, form nearby sister concern unit	Noted and compliance assured.



Sr.	Condition	Compliance
No.	M/s Atul Ltd as per agreement	
	submitted by PP.	
12	Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water in case of any shut down of MEE.	Noted and complied.
13	The PP shall developed green belt within premises (12855 m² i.e. 33% of the total plot area) as per the undertaking submitted before SEAC. Green belt shall be developed with native plant species that are significant and used for the pollution abatement as per the CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.	Noted and compliance assured. Green belt development and tree plantation is carried out inside the plant premises to increase the bio-diversity of the area. In future more plantations will be carried out. Photographs and details of existing greenbelt are given herewith for your ready reference.







Sr. No.	Condition	Compliance



Sr. No.	Condition	Compliance
14	Unit shall obtained all required permissions from the Narcotics Control Bureau for manufacturing, storage and handling of Acetic Anhydride & any such chemicals	Noted and Complied. We have obtained required permission from the Narcotics Control Bureau for manufacturing, storage and handling of Acetic Anhydride.
15. S	Safety & Health :	
a)	PP shall provide Occupational Health Center (OHC) as per the provisions under the Gujarat Factories Rule 68-U.	Noted and compliance assured. As the M/s. Atul Bio- Science Ltd. is situated in the Atul Complex, a mutual aid agreement with neighboring parent company Atul Ltd is already done who is having well qualified resident doctors, whenever required instantly apart from nearby renowned hospitals.
b)	PP shall obtain fire safety certificate / Fire No-Objection certificate (NOC) from the concern authority as per the prevailing Rules / Gujarat Fire Prevention and Life Safety Measures Act, 2016.	Noted and Complied.
c)	Unit shall adopt functional operations/process automation system including emergency response to eliminate risk associated with the hazardous processes.	Noted and compliance assured. Unit has adopted operational process automation system like DCS, PSVs, safety interlocks, emergency on/off buttons, LEL detectors etc for early detection of emergency and eliminate the risk in line with HAZOP study.
d)	PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident.	Noted and compliance assured. Unit regularly conducts mock drills within the premises. Last mock drill was conducted on June 27, 2023. Report of the mock drill is attached herewith for your ready reference.



Sr.	Condition	Compliance					
No.							
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			Pre-learn feet we sweep appropriate PPEs & rescues the costupity and lead to DoH	Destroy Person	LAGE		
e)	PP shall obtain PESO permission for the storage and handling of hazardous chemicals. (if applicable)	PESO permissi and handling chemicals vide valid up to De	ion is already ob of class A and e license no. P/I cember 31, 2028 with for your ready	d class C I HQ/GJ/15/41 3. Copy of th	nazardous (P9652),	which do the property of a cold cold finite from property and property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the property of the pro	The state of the s



Sr.	Condition	Compliance
No.		
f)	Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.	Noted and compliance assured. Electrical Flame Proof fittings has been provided as per hazardous area classification.
g)	PP shall install adequate fire hydrant system within premises and separate storage of water for the same shall be ensured by PP.	Noted and compliance assured. Unit has adequately provided fire hydrant system with dedicated fire water reservoir of capacity 600 KL is provided.
h)	PP shall take all the necessary steps for control of storage hazards within premises ensuring incompatibility storage raw material and ensure the storage keeping safe distance as per the prevailing guideline of the concerned authority.	Noted and compliance assured. All materials are stored as per approved compatibility matrix in dedicated warehouse only.
i)	PP shall, take all the necessary steps for human safety within premises to ensure that no any harm is caused to any worker/employee or labor within premises.	Noted and Complied through regular safety audits, trainings, mock drills, SOPs, providing appropriate PPE's etc.
j)	Unit shall provide water sprinkler to the ammonia storage cylinder	Not applicable as the unit is not using ammonia presently, and hence, storage is not required. Water sprinkler or appropriate control system will be provided for ammonia storage cylinder prior use and storage of the same.
k)	Unit shall provide safety valve and rupture disc, as well as auto dump or autos quench/, suppress system for exothermic reaction vessel safety.	Noted and compliance assured. Photographs of the safety valve and rupture disc provided to the reaction vessels are attached herewith for your ready reference.



Sr. No.	Condition	Compliance
l)	Unit shall provide safety valve &	Noted and compliance assured.
	rupture disc to the Hydrogenation vessel.	Unit has provided safety valve & rupture disc in all Hydrogenation vessel. Photographs of the same is attached herewith for your ready reference.
	vessei.	The same is attached herewith for your ready reference.
		Safety valve & rupture disc in Hydrogenation vessel



Sr. No.	Condition	Compliance			
m)	Unit shall provide chlorine leakage	Not applicable as unit is not storing and handling chlorine presently. However, we have			
	control emergency kit and FRP hood with scrubber system for chlorine	provided appropriate safe	ty system for its use.		
	safety.				
n)	Unit shall provide effective isolation for	Noted and compliance assured.			
	process area and storage of hazardous	Unit has already provided	separate area for proce	ss area and warehouse f	or storage of
	chemicals.	hazardous chemicals.			
0)	Unit shall provide adequate safety	Noted and compliance ass			
	system such as water sprinklers, water	The unit has already prov			
	curtains, foam pouring system etc. To	with proper earthing, flame arresters, lightening arresters, fencing, Fire hydrant system,			
	restrict cascade fire emergency in	Fire extinguishers, flame proof equipment, etc. safety measures.			
1 2	solvent tank farm.				
A. 2					
16	Total water requirement for the project	Noted and compliance assured. The average total fresh water consumption for the report period is 112.43 m³/day only			
	shall not exceed 598 KLD. Unit shall				
	reuse 399.20 KLD treated waste water.	which is well within the lir	•	·	tted onto GPCB
	Hence fresh water shall not exceed	XGN portal on regular bas			
	198.80 KLD. It shall be met through	Month		ımption in m³	
	from River water (Par River) and from		m³/month	m³/day	
	nearby municipal STPs. Prior	April 2023	3858	128.6	
	permission from the concerned	May 2023	4416	142.45	
	authority shall be obtained for	June 2023	2993	99.87	
	withdrawal of water.	July 2023	2473	80	
		August 2023	3593	115.90	
		September 2023	3243	108.1	
		Average	3429	112.43	



Sr.	Condition	Compliance				
No. 17	The industrial effluent generation from the project shall not exceed 450.50 KLD after expansion.	Noted and compliance assured. The average total industrial effluent generation for the report period is 53.8 m³/day only which is well within the limit. Details given in below table:				
		Month	Wastewa	ter generation in	m³	
		MOHUT	m³/month	r	n³/day	
		April 2023	2298		76.6	
		May 2023	1564		50.45	
		June 2023	1499		49.97	
		July 2023	1490		48.06	
		August 2023	1800		58.06	
		September 2023	1872		62.4	
		Average	1754		53.8	
		The maximum values d generation went beyon Waste- water generation	• .	Summary is given Values for the	en below:	
				Min.	Max.	Avg.
		Wastewater generation, m³/day	450.5	48.06	76.6	53.8
18	Industrial effluent shall be segregated into two streams (1) High COD and TDS effluent (2) Low COD and TDS effluent and it shall be managed as below.					



Sr.	Condition	Compliance
No.		
	 High COD and TDS effluent (147 	Noted and will be complied after commissioning of ZLD system.
	KLD):	
	147 KLD, high COD effluent from	At present, all the high COD streams are being diverted to recovery system rather than incineration. Streams containing Solvents, etc. are taken for the recovery of the same and
	process shall be treated in primary ETP	reused. Hence, there is no high COD waste water stream remaining.
	followed by solvent stripper and then it	reused. Herice, there is no high COD waste water stream remaining.
	shall be evaporated in in-house MEE	
	cum ATFD.137 KLD, MEE condensate	
	shall be further treated in Low COD	
	Stream ETP.	
	• Low COD and TDS effluent	Noted and will be complied after commissioning of ZLD system.
	(303.50 KLD) :	
	> 303.50 KLD, Low COD and TDS	ZLD commissioning is under process. Hence, Effluent is sent to ETP of Atul Ltd for treatment
	effluent from utility along with 137	and discharge as per EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009
	KLD, MEE condensate shall be treated	
	in ETP consist of primary, secondary	
	and tertiary ETP units. Treated effluent	
	shall be further passed through	
	ultra-filtration/RO plant and 399.20	
	KLD, RO permeate shall be reused	
	back in process while 44.30 KLD, RO	
	reject shall be evaporated in in-house	
	MEE.	
19	Domestic waste water generation shall	Noted and compliance assured.
	not exceed 10 KL/Day for proposed	Domestic wastewater generated from existing as well as proposed project is being
	project and it shall be treated in STP.	disposed off through a septic tank/ ETP.
	Treated sewage shall be utilized for	
	gardening and plantation purpose	



Sr.	Condition	Compliance
No.	Condition	Compilatice
INO.	within premises after achieving on-land discharge norms prescribed by the GPCB.	
20	During monsoon season when treated sewage may not be required for the plantation / Gardening / Green belt purpose, it shall be stored within premises. There shall be no discharge of waste water outside the premises in any case.	Complied. Domestic wastewater is being disposed off through a septic tank/ ETP.
21	Unit shall feed waste water to in-house MEE only after ensuring content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no adverse impacts on Environment and Human Health.	Noted and will be complied as project is in implementation stage. The ZLD system is under commissioning stage. Appropriate measures will be taken to avoid any air borne or VOC emissions.
22	The unit shall provide metering facility at the inlet and outlets of ETP, RO,EE and maintain records for the same.	Noted and compliance assured Electromagnetic Flow meters has been provided at all the inlet and outlet streams for ETP (ABL) and UF-RO and log book is maintained regularly for ETP operation. Photographs of the flow meter installed in ETP and UF-RO are attached herewith for your ready reference.



Sr. No.	Condition	Compliance	Compliance
		ETP Inlet (ABL) ETP Outlet (Treated effluent goes to UF-RO during commissioning)	ETP Inlet (ABL)
		UF-RO Inlet UF-RO Permeate UF-RO Reject	UF-RO Inlet



Sr. No.	Condition	Compliance
		MEE
23	Proper logbooks of ETP, chemical consumption in Effluent treatment, quantity & quality of effluent sent to MEE, quantity & quality of effluent recycle back in process, power consumption etc shall be maintained and shall be furnished to the GPCB from time to time.	Noted and compliance assured. Proper logbooks are maintained for ETP - ABL (quantity and quality) and chemical consumption on daily basis. Logbook for RO and MEE is maintained.



Condition Compliance Sr. No. A.3 AIR: 24 Unit shall not exceed fuel consumption Noted and compliance assured. DG sets is being used only as a power backup only. for DG set as mentioned below: Details of HSD consumption in DG sets given in below table: Air Pollution Control Megaures (APCM) Source of emission With Capacity Quantity of Fuel MT/Day **HSD** consumption Month Litre/month PM, SO₂, NO_X April 2023 5.4 May 2023 4.2 No additional Flue gas stack proposed June 2023 3.8 July 2023 5.4 August 2023 4.6 September 2023 5.4 Unit shall provide adequate APCM with Not applicable as steam will be supplied by parent company Atul Ltd. Hence, no flue gas 25 flue gas generation sources as stack is installed in the premises. Adequate stack height is provided for stack attached to mentioned above. DG set.



Sr.	Condition	Compliance
No.	Limit ale all regarded and accorded ADCAA with	Nieta dans da consultant de accounted
26	Unit shall provide adequate APCM with Process gas generation sources as mentioned below:	Noted and compliance assured. Water and alkaline scrubber are installed as Air Pollution Control Measures (APCM) having stack height of 12 meters. Photograph is attached herewith for your ready reference.
	Sr. Inserting System of the Product & Type of amissions in Air Pollution Control Measures (s. Air Pollution Shelphin Process) Existing Existing HC, SO, HC, Cletc.) Existing HC, SO, HS, 12 Water & Aikaline Scrubber Proposed addition after expansion MPP2 HC, SO, NH5 HC,	
27	The fugitive emission in the work zone	Noted and compliance assured.
	environment shall be monitored. The	Work Zone Environment Monitoring is carried out and record maintain in Form No. 37.
	emission shall conform to the standards prescribed by the concerned authorities from time to time (e g. Directors of Industrial Safety & Health). Following indicative guidelines shall	Summary of results of VOC monitoring is given in below table:



Sr. No.	Condition	Compliance								
110.	also be followed to reduce the fugitive		Ground Floor MPP2							
	emission.	Parameter	Permissible			Results fo	r the perio	d		
			limit	April-2 3	May-23	June-2 3	July-23	Aug-23	Sept-23	
		Chlorine	3 mg / Nm ³	ND	ND	ND	ND	ND	ND	
		Toluene	150 ppm	115	76	100	110	25	38	
	concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement. Air borne dust shall be controlled	reference.	paved area or						your reday	
	with water sprinklers at suitable locations in the plant.	vvc are doing	regular acarılı	ig with dry	booming (as an cady	iow dust z	LOTIC.		



Sr. No.	Condition	Compliance
	A green belt shall be developed all around the plant boundary and also along the roads to mitigate fugitive & transport dust emission.	We have planted trees along the boundary wall and both side of road. Photographs and details of existing greenbelt are attached in point no. 13 for your ready reference.
28	Regular monitoring of Volatile Organic Compounds (VOCs) shall be carried out in the work zone area and ambient air.	Noted and compliance assured. Work zone environment and ambient air monitoring is carried out monthly by NABL accredited laboratory and records are maintained. Summary of results of VOC monitoring and ambient air monitoring are given in point no. 27 and 31 respectively.
29	For control of fugitive emission, VOCs, following steps shall be followed:	
a.	Closed handling and charging system shall be provided for chemicals	Noted and compliance assured. All reactors are in close loop and connected with condensers having cooling tower water, chilled water or brine water supply for control of fugitive emission.
b.	Reflux condenser shall be provided over Reactors/Vessels	Noted and compliance assured. Photographs of the reflux condenser provided over reactors/vessels are attached herewith for your ready reference.



Sr. No.	Condition	Compliance	
No.			
C.	Pumps shall be provided with	Noted and compliance assured.	
	mechanical seals to prevent leakages	Reactor and solvent handling pump do h Photographs of the same are attached herew	have mechanical seals to prevent leakages.
		Reactor	Solvent handling pump



Sr.	Condition	Compliance
No.		
d.	Air borne dust at all transfers operations points shall be controlled either by spraying water or providing enclosures	Noted and complied. We are doing regular cleaning with dry booming as already low dust zone.
30	Solvent management shall be carried out as follows:	
	Measures shall be taken to reduce the process vapours emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapour recovery system.	Noted and compliance assured. Reactions are carried out in closed reactors with primary and secondary condenser to control solvent vapour. Chilled water is used in condenser. As far as practicable we will avoid using toxic solvents or minimizing its use.
	Reactor shall be connected to adequate chilling system to condensate solvent vapours and reduce solvent losses	Noted and complied. Reactors are connected to chilled brine condenser system.
	Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	Noted and complied. Reactor and solvent handling pump do have mechanical seals to prevent leakages. Photographs of the same are attached in point no. 29 (c) for your ready reference.
	The condensers shall be provided with sufficient HTA and residence time so as to achieve maximum solvent recovery.	Noted and complied. The condensers are provided with sufficient HTA and residence time to achieve maximum solvent recovery.
	Solvents shall be stored in a separate space specified with all safety	Complied. The unit has already provided underground storage tanks with secondary containment to



Sr. No.	Condition	Compliance
	measures.	restrict fire emergency in solvent tank farms. Photographs of the same are attached herewith for your ready reference.
	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	Noted and compliance assured. Double earthing is provided and regular checking and testing of the same is being done and recorded.
	Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	Noted and compliance assured. Solvents are being stored in PESO approved tank farms complying with all the stipulated conditions including flameproof electrical equipment. Breather valve is also provided on solvent storage tank.



Sr. No.	Condition	Comp	liance							
31		We a location	Noted and compliance assured. We are regularly doing ambient air monitoring through NABL approved agency at 0 locations at a time. We have provided ambient air monitoring stations in line with guideline of CPCB/GPCB. Summary of ambient monitoring is given in below table: Near MPP 1 Plant							,
	any stage these levels are found to					entration	in Ambie	ent air in u	ıq/M³	
	exceed the prescribed limits, necessary additional control measures shall be	Sr. No.	Pollutant	GPCB limits	April- 23	May-2 3	June- 23	July-2 3	Aug-2	Sept-2
	taken immediately. The location of the stations and frequency of monitoring	1.	Sulphur Dioxide (S02)	80	14.3	16.2	15.8	13.6	11.5	15.8
	shall be decided in consultation with the GPCB.	2.	Nitrogen Dioxide (N02)	80	27.4	26.4	28.2	30.2	25.2	31.6
		3.	Particulate Matter (Size less than 10 um) OR PM10	100	91.4	91.8	96.2	89.6	91.4	96.3
		4.	Particulate Matter (Size less than 2.5 um) OR PM2.5	60	56.8	55.3	57.9	54.9	52.8	49.1
		5.	Carbon monoxide (CO)	02	0.58	0.48	0.40	0.32	0.24	0.80



Condition Compliance Sr. No. Near MPP 2 Plant Concentration in Ambient air in ug/M³ Sr. Pollutant **GPCB** May-2 June-July-2 Aug-2 Sept-2 April-No. limits 23 23 3 3 Sulphur Dioxide 12.4 13.2 13.1 10.8 13.7 80 13.1 1. (S02) Nitrogen Dioxide 80 21.7 27.1 28.4 27.1 24.9 24.6 (N02) Particulate Matter 83.1 91.7 85.2 88.5 81.8 (Size less than 10 100 83.4 um) OR PM10 Particulate Matter 44.7 50.9 53.2 50.7 49.3 (Size less than 2.5 53.7 60 um) OR PM2.5 Carbon monoxide 0.52 0.54 0.54 0.30 0.45 02 0.64 (CO) A. 4 SOLID/HAZARDOUS WASTE Noted and complied. 32 All the hazardous waste management shall be taken care as mentioned We have already applied for CCA amendment application to GPCB vide Inward ID: 285325 dated July 31,2023 for EC project. below: Unit is taking care of hazardous waste generated in the premises as per valid CCA.



Sr.	Condition	Comp	liance				
No.	1	Sr. No.	Hazardous waste	Cat.	Consented Generation Qty	Actual Generation Qty	Mode of Disposal
	Process Proc	1	Process waste	28.1	20.64 MT/Year	4.86 MT (April -23 to Sept -23)	Incineration at incineration system of Atul Ltd
	6. Sport exhert Proposa SS 5** S5204 MTAnnum MTAnnum bestitation and resear to containing the first state of the first state	2	Discarded Containers/ Bags/ Liners	33.1	26.4 MT/Year	12.47 MT (April -23 to Sept -23)	Selling to authorized recycler
	10 Celection, strongs & Whetsoever generation Collection, strongs & Collection, strongs	3	HCI (30%)	Sche dule – II (B15)	153 MT/Year		Selling to unit who have obtained rule 9 permission.
	Hydroxide MAP 41EEF Hydroxide Hydrox			,			
Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other wastes (Management and Trans boundary) Noted and compliance assured. Presently, we are not generating any waste that needs to be disposed of 9 of the Hazardous and Other wastes (Management and Trans boundary) Rules 2016 according to valid GPCB consent.							•



Sr.	Condition	Complia	nce					
No.	Movement) Rules 2016.							
	Wovernerry (Vales 2010.							
34	Unit shall explore the possibilities for	Noted.						
	environment friendly methods like							
	co-processing of hazardous waste for							
	disposal of Incinerable & land fillable							
	wastes before sending to CHWIF & TSDF sites respectively.							
	13DI Sites respectively.							
A. 5	OTHER:							
35	The project proponent shall allocate the	e Noted and complied.						
	separate fund of Rs. 76.50 Lakhs as		re proposed a separate budget for CER activity and cert	ain activities has beer				
	committed before SEAC. The entire		out under CSR as well.					
	activities proposed under CER shall be	Details o	of the budget for 2023-24 is given below:					
	part of the Environment Management	Sr.No.	Descriptions	Amount				
	Plan (EMP) as per the MoEF& CC's OM	51.140.	Descriptions	(INR)				
	no. F. No. 22-65/2017-IA III dated 30.09.2020. This shall be monitored	1	Atar Anganwadi project	6,32,500				
	and the monitoring report shall be		(including civil cost, painting cost, art painting cost, etc.)	0,32,300				
	submitted to the regional office of	2	Chanvai Anganwadi project	2,75,500				
	MoEF&CC as a part of half-yearly	_	(including civil cost, painting cost, etc.)	2,7 0,000				
	compliance report and to the District	3	GST	1,63,440				
	Collector. The monitoring report shall be		Total Cost	10,71,440				
	posted on the website of the project			,/ =,				
	proponent.							



Sr. No.	Condition	Compliance
36	All the environmental protection measures and safeguards proposed in the Form-1 & PFR submitted by the project proponent and commitments made in their application shall be strictly adhered to in letter and spirit.	Noted and compliance assured. We have taken and will continue to implement all the environmental protection measures and safeguards proposed in the Form-1 and PFR and are strictly adhering to them in true spirit.
B. GI	ENERAL CONDITIONS:	
B1.	CONSTRUCTION PHASE:	
37	Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.	Noted and compliance assured. Use of curing agents and super plasticizers are being practiced during the construction.
38	Project proponent shall ensure that surrounding environment shall not be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for controlling fugitive emission.	Noted and compliance assured. Regular water sprinkling is being done near construction site to controlling fugitive emission of dust.
39	All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the	Noted and compliance assured. Adequate sanitary and hygienic measures has been provided at the site and will be maintained throughout the construction phase as below: • Clean up of jobsite after major tasks or at least daily; • Avoiding the build-up of hazardous, flammable, or combustible materials.



Sr.	Condition	Compliance
No.		
	construction phase.	 Keeping walkways, stairs, and work areas clear. Separate bathroom facilities are provided for male and female workers on a job site. Washing facilities on the site is provided for workers to wash their hands and avoid cross-contamination before eating, drinking or heading home for the day. Hence, workers can wash away harmful substances and use the washing area to service and decontaminate personal protective equipment (PPE).
40	First Aid Box shall be made readily	Noted and compliance assured.
	available in adequate quantity at all the	First Aid boxes have been provided in adequate quantity.
	times.	
41	The project proponent shall strictly comply with the building and other construction workers (Regulation of employment & conditions of service) Act 1996 and Gujarat rules made there under and their subsequent amendments. Local bye-laws of concern authority shall be letter ans spirit.	Noted and compliance assured. We abide to comply by the Building and other Construction Workers (Regulation of Employment & Conditions of Service) Act 1996 and Gujarat rules made there under and their subsequent amendments.
42	Ambient noise levels shall conforms to residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.	Noted and compliance assured. We are regularly doing noise monitoring through NABL approved agency. Summary of noise monitoring is given in below table:



Sr. No.	Condition	Comp	liance					
		Sr. No.	Date of Monitoring	Test Parameter	Unit	Sampling location	Results	Permissible limits
		1	11/04/2022				77.9	
		2	09/05/2022				76.8	
		3	02/06/2022	Nosie	dB	Utility Near	74.7	85
		4	05/07/2023	110310	(A)	Compressor	73.8	
		5	04/08/2023				75.5	
		6	12/09/2023				76.3	
43	Use of Diesel Generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the EPA Rules for air and noise emission standards.	Noted and compliance assured. We have not proposed any new DG sets. Existing DG sets are being used in case of power failure only. Noise Abatement: Enclosed with acoustic enclosure type DG sets are installed. Fuel: Fuel used in DG sets conforms to Environment (Protection) rules prescribed for air and noise emission standards.						
44	Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.	Noted and compliance assured. The wastewater generated is being disposed off through a septic tank/ETP and solid waste generated is being properly collected, segregated and disposed on regular frequency.						
45	All topsoil excavated during construction activity shall be used in horticultural landscape development within the project site.	All the top soil excavated during construction work is utilized in horticulture/ landscape						
46	Excavated earth to be generated during	Noted	l and complianc	e assured.				



Sr.	Condition	Compliance
No.		
	the construction phase shall be utilized	
	within the premises to the maximum	development within the premises.
	extent possible and balance quantity of	
	excavated earth shall be disposed off	
	with the approval of the competent	
	authority after taking the necessary	
	precautions for general safety and	
	health aspects. Disposal of the	
	excavated earth during construction	
	phase shall not create adverse effect on	
	neighbouring communities.	
47	Project proponent shall ensure use of	Noted and compliance assured.
	eco-friendly building materials	Fly Ash bricks is being used along with Ready Mix Concrete [RMC] and fly ash paver blocks
	including fly ash bricks, fly ash paver	for the construction.
	blocks, Ready Mix Concrete [RMC] and	
	lead free paints in the project.	
48	Fly ash shall be used in construction	Noted.
	wherever applicable as per provisions	We shall explore feasibility for usage of fly ash in construction activities, shall ensure
	of Fly Ash Notification under the E.P.	compliance of notification under E.P. Act, 1986 and its subsequent amendments from time
	Act, 1986 and its subsequent	to time.
	amendments from time to time.	
49	"Wind - breaker of appropriate height	Noted and complied.
.0	i.e. 1/3rd of the building height and	Temporary wind shielding had been provided and barricades of adequate height also had
	maximum up to 10 meters shall be	



Sr. No.	Condition	Compliance
	provided. Individual building within the project site shall also be provided with barricades.	been provided along the periphery of the project site.
50	"No uncovered vehicles carrying construction material and waste shall be permitted."	Noted and is being ensured that the materials are covered using carpet cloth during transportation to control the fugitive emission.
51	"No loose soil or sand or construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emissions shall be ensured."	Noted and is being ensured.
52	Roads leading to or at construction site must be paved and blacktopped (i.e metallic roads).	Noted and ensured.
53	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	Noted. Utmost measures are being adopted to prevent dust at our construction sites before carrying out any excavation activity.
54	Dust mitigation measure shall be displayed prominently at the construction site for easy public viewing.	Noted for compliance.



Sr.	Condition	Compliance
No.		
55	Grinding and cutting of building	The stated condition is noted and being implemented.
	materials in open area shall be	
	prohibited.	
56	Construction material and waste	Noted.
	should be stored only within earmarked	
	area and road side storage of	
	construction material and waste shall	
	be prohibited.	
57	Construction and demolition waste	Noted.
"	processing and disposal site shall be	10.004
	identified and required dust mitigation	
	measures be notified at the site. (If	
	applicable).	
D 0 6	DEED A TION I BUILA CE	
B.2 C	PERATION PHASE:	
B.2.1	. WATER :	
58	The water meter shall be installed and	Noted and compliance assured.
	records of daily and monthly water	Monthly water consumption reports are submitted onto GPCB XGN portal on regular basis.
	consumption shall be maintained.	
59	All efforts shall be made to optimize	We have taken a note of the same and will explore the same.
53	water consumption by exploring Best	vve have taken a note of the same and will explore the same.
	Available Technology (BAT). The unit	
	shall continuously strive to reduce,	



Sr. No.	Condition	Compliance
INO.	recycle and reuse the treated effluent.	
B.2.2	2 AIR :	
60	In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that there should not be any adverse impact on human health & environment. Unit shall carry out third party monitoring of the proposed Spray dryer & it's APCM through the credible institutes and study report for impacts on Environment and Human Health shall be submitted to GPCB every year along with half yearly compliance reports.	It may be please noted that the unit is not having spray dryer as APCM.
61	Acoustic enclosure shall be provided to the DG sets (if applicable) to mitigate the noise pollution and shall conform to the EPA Rules for air and noise emission standards.	Noted and compliance assured. We have not proposed any new DG sets. Existing DG sets are being used in case of power failure only. Noise Abatement: Enclosed with acoustic enclosure type DG sets are installed. Fuel: Fuel used in DG sets conforms to Environment (Protection) rules prescribed for air and noise emission standards.
62	Stack/Vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas	Noted and compliance assured. Adequate height of stack provided as per prevailing norms.



Condition	Compl	iance							
emission/Process gas emission.									
Flue gas emission & Process gas		•							
standards prescribed by the GPCB/				rubber are	provided	to contro	ol emissio	ons.	
CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated	We are	e regularly doing	process	gas emiss	sion throu	gh MoEF	&CC & N	ABL appı	roved ag
standards.	Summary of process gas is given in below table:								
	Stack attached to MPP 1								
	C	Results in Milligram per Nm³							
	No.	Pollutant	GPCB limits	April-2 3	May-2 3	June- 23	July-2 3	Aug-2 3	Sept- 23
	1.	Chlorine (Cl ₂)	09	4.9	4.40	4.80	5.10	5.10	6.20
	2.	Hydrochloric acid (HCI)	20	5.03	5.18	4.93	5.24	5.24	6.37
All the reactors/vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	All rec	and compliance actors are in cla	se loop	and coni				_	oling to
	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards.	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. Summer St. No. 1. 2. All the reactors/vessels used in the manufacturing process shall be closed Noted There is Two St. No. 1. 2.	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. Summary of process gas emission (We are regularly doing Summary of process gas Two Stage Water + Color (We are regularly doing Summary of process gas Two Stage Water + Color (We are regularly doing Summary of process gas emission (PCB) Sr. Pollutant 1. Chlorine (Cl2) 2. Hydrochloric acid (HCI) All the reactors/vessels used in the manufacturing process shall be closed	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. Summary of process gas is give Sr. No. Pollutant GPCB limits 1. Chlorine (Cl2) 09 2. Hydrochloric acid (HCl) All the reactors/vessels used in the manufacturing process shall be closed Noted and compliance assured. There is no flue gas emission. Two Stage Water + Caustic Scr. We are regularly doing process Summary of process gas is give Summary of process gas i	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. Two Stage Water + Caustic Scrubber are We are regularly doing process gas emission. To Stack attached Standards. Stack attached Standards and Continue (Cl ₂) 09 4.9 2. Hydrochloric acid (HCl) 20 5.03 All the reactors/vessels used in the manufacturing process shall be closed. All reactors are in close loop and continue to the standards and continue to the standard and continue	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. Summary of process gas is given in below table: Stack attached to May-2 limits 3 3 1. Chlorine (Cl2) 09 4.9 4.40 All the reactors/vessels used in the manufacturing process shall be closed Noted and compliance assured. There is no flue gas emission. Two Stage Water + Caustic Scrubber are provided We are regularly doing process gas emission throu Summary of process gas is given in below table: Stack attached to May-2 limits 3 3 1. Chlorine (Cl2) 09 4.9 4.40 2. Hydrochloric acid (HCl) Noted and compliance assured. All reactors are in close loop and connected was a connected was	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. Summary of process gas is given in below table: Stack attached to MPP 1 Sr. Pollutant GPCB April-2 May-2 June-limits 3 3 23 1. Chlorine (Cl ₂) 09 4.9 4.40 4.80 All the reactors/vessels used in the manufacturing process shall be closed Noted and compliance assured. All reactors are in close loop and connected with cond	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. We are regularly doing process gas emission through MoEF&CC & N Summary of process gas is given in below table: Stack attached to MPP 1 Sr. No. Pollutant GPCB April-2 May-2 June-July-2 Iminits 3 3 23 3 3 1. Chlorine (Cl2) 09 4.9 4.40 4.80 5.10 Chlorine (Cl2) 09 5.03 5.18 4.93 5.24 All the reactors/vessels used in the manufacturing process shall be closed	emission/Process gas emission. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards. We are regularly doing process gas emission through MoEF&CC & NABL approach (Summary of process gas is given in below table: Stack attached to MPP 1 Sr. Pollutant GPCB April-2 May-2 June- July-2 Aug-2 Aug-



Sr.	Condition	Compliance
No.	Condition	Compilative
65	The company shall strictly comply with the rules and regulations with regards to handling and disposal of Hazardous waste in accordance with the Hazardous and Other Wastes (Management and Trans boundary Movement) Rules 2016, as may be amended from time to time. Authorization of the GPCB shall be	Noted and compliance assured. We have applied for the Consent to operate during report period and approval is awaited.
	obtained for collection / treatment /storage/ disposal of hazardous wastes.	
66	Hazardous wastes shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.	Noted and compliance assured. We have provided dedicated facility for treatment/ packing and storage of Hazardous waste as per Hazardous Waste Rules, 2016 as may be amended from time to time.



Sr. No.	Condition	Compliance
67	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable)	Noted and complied. Presently, we are using captive facilities of Atul Ltd as per point 5 of EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009. We have also obtained membership of SEPL for integrated common hazardous waste management facility which is valid up to 24/03/2027 and the same is attached for your ready reference.
68	Trucks/Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.	Noted and compliance assured. We have agreement with authorized vendors which complies with the provisions under the Motor Vehicle Act, 1988, and rules made there under for transportation of Hazardous Waste.



Manufacture, Storage and Import of

Hazardous Chemicals Rules (MSIHC)

1989, as amended time to time and the

Public Liability Insurance Act for

Compliance Sr. Condition No. The design of the Trucks/tankers shall Noted and being ensured. 69 be such that there is no spillage during transportation All possible efforts shall be made for 70 Noted. Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF Management of fly ash (If any) shall be It may be please noted that there is no fly ash generation from unit. 71 as per the Fly ash Notification 2009 & its amendment time to time and it shall be ensured that there is 100% utilization of fly ash to be generated from the unit. **B.2.4 SAFETY** The occupier/manager shall strictly We are complying with the stated condition and submitting required compliance to DISH. 72 comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963. The project authorities shall strictly Complied. 73 comply with the provisions made in Following measures are taken.

MSDS for all chemicals.

• Plan approval from DISH.

• Factory license from DISH.

• Licenses for petroleum product, gas cylinders, poison/toxic chemical.



Sr. No.	Condition	Compliance
	handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning of the project. Requisite On-site and Off-site Disaster Management Plans have to be prepared and implemented.	 A mutual aid agreement with neighboring parent company Atul Ltd to render all emergency services. On site emergency plan and offsite mutual aid. Etc.
74	Main entry and exit shall be separate and clearly marked in the facility	Noted. Adequate width of road (excluding greenbelt) is provided for ease in transportation. Separate entry and exit is provided.
75	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/ emergency vehicle around the premises.	Noted and compliance assured. A clear margin excluding greenbelt has been provided for free movement of fire tender/ emergency vehicle around the premises.
76	Storage of flammable chemicals shall be sufficiently away from the production area.	Noted and compliance assured. Dedicated storage facility of flammable chemicals provided at safer distance from production area as per PESO approval.
77	Sufficient number of fire extinguishers shall be provided near the plant and storage area.	Noted and compliance assured. We have provided approx. 100 Nos of fire extinguishers (Foam type, CO ₂ type, ABC type) across the site to cover all area.



Sr.	Condition	Compliance
No. 78	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals. All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permissions in this regard shall be obtained before commencing the expansion activities	Noted and compliance assured. All necessary precautionary measures are taken to avoid any kind of accident during storage and handling of toxic/hazardous chemicals. HAZOP and Risk assessment system is in place. Induction/Refresher/specific training system is carried out on regular basis for all employees. Noted and compliance assured. All the toxic/hazardous chemicals are stored in optimum quantity and all necessary permissions are obtained with regards to the storage and handling of the same.
80	The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report.	Noted and compliance assured. HAZOP/HIRA/ Audit is the tool used for carrying out risk assessment and mitigation measures. Safety as well as Environment audit is also being carried out.
81	Only flame proof electrical fittings shall be provided in the plant premises.	Noted and compliance assured. Electrical Flame Proof fittings has been provided as per hazard area classification.
82	Storage of hazardous chemicals shall be minimized and it shall be in multiple small capacity tanks/ containers instead of one single large capacity tank/containers.	Noted and compliance assured. We have already identified the toxic chemicals and following proper handling and control procedure during handling of the same. We are using required chemicals in very optimum quantity.



Condition Compliance Sr. No. 83 All the storage tanks shall be fitted with Noted and compliance assured. A dyke is provided to contained spill to all the existing storage tanks. Mechanical seals are appropriate controls to avoid any installed on existing pumps, mixers, and reactors. leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals. 84 Handling and charging of the chemicals Noted and compliance assured. Filling is done on weighing balance manually but in controlled manner to minimize spillage. shall be done in closed manner by All reactors are in close loop and connected with condensers having cooling tower water, pumping or by vacuum transfer so that Chilled water or brine water supply for control of fugitive emission. minimal human exposure occurs



Sr. No.	Condition	Compliance
85	Tie up shall be done with nearby health care unit/ doctor for seeking immediate medical attention in the case of emergency.	Noted and compliance assured. As the M/s. Atul Bio- Science Ltd. is situated in the Atul Complex, a mutual aid agreement with neighboring parent company Atul Ltd is already done who is having well qualified resident doctors, whenever required instantly apart from nearby renowned hospitals.
86	Personal Protective Equipment (PPEs) shall be provided to workers and its usage shall be ensured and supervised.	Noted and compliance assured. We are providing necessary PPE's, respiratory systems to all the employees of the company. We have prepared the SOP for the use of PPE's and training for the same is being given to all the employee regularly.
87	First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	Noted and compliance assured. First aid box and required antidotes for the chemicals used in the unit area are available in adequate quantity.
88	Training shall be imparted to all the workers on safety and health aspects of chemicals handling.	Noted and compliance assured. Regular training is being provided on handling of chemicals to all workers. Induction / Refresher / specific topic related training is being regularly conducted on various topics. Last six month topics covered i.e.: > Emergency siren testing > Work place safety > SCBA donning procedure > Process safety
89	Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre-employment and periodical medical examination for all the workers shall be undertaken as	Noted and compliance assured. Pre-employment & periodic medical examinations as per statutory requirement are regularly conducted & records of the same are maintained in Form No. 32 & 33 as per Gujarat Factory Rules, 1962 respectively.



Compliance

EC No. SEIAA | GU| | EC | 5(f) | 965 | 2021

per the Factories Act & Rules.

the Motor Vehicle Act & Rules.

Transportation of hazardous chemicals

shall be done as per the provisions of

The company shall implement all

preventive and mitigation measures suggested in the Risk Assessment

Necessary permissions from various

statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the Risk assessment & mitigation is a part of plant design. We have obtained necessary permission from various statutory authorities as applicable.

Period: April 2023 to September 2023

B.2.5 NOISE:

Report.

project.

Sr.

No.

90

91

92

Condition

The overall noise level in and ground the plant area shall be kept well within the standards by providing noise control measures including engineering controls like acoustic insulation hoods. silencers, enclosures etc. on all sources of noise generation. The ambient noise

Noted and compliance assured.

Noted and compliance assured.

Noted and compliance assured.

Noted and compliance assured.

We are regularly doing noise monitoring through NABL approved agency. Summary of noise monitoring is given in below table:

Sr. No.	Date of Monitoring	Test Parameter	Unit	Sampling location	Results	Permissible limits
1	11/10/2022	Nosio	4D (A)	Utility Near	77.2	OE.
2	16/11/2022	Nosie	dB (A)	Compressor	76.5	85



Sr. No.	Condition	Compliance
	level shall confirm to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.	3 09/12/2022 4 10/01/2023 5 08/02/2023 6 09/03/2023 77.8 78.4 79.3 78.4
B.2.6	CLEANER PRODUCTION AND WASTE N	MINIMISATION:
94	The unit shall undertake the Cleaner Production Assessment study through a reputed institute / organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to the GPCB.	Noted and compliance assured. We have state of art R&D centre with latest research facility. A qualified team is continuously working on such concept. Drug is developed with such basic philosophy as below: Optimisation of use of water in place of solvent in manufacturing activity. Replacement of hazardous raw material with less hazardous raw material. Avoid use of toxic material. Optimisation of exothermic reaction. Control on material mass balance with maximum reaction conversion. This will improve yield.
95	The company shall undertake various waste minimization measures such as:	Noted and compliance assured. • All the liquid ingredients are being charged through measure vessels and/or flow meters to control on quantity as per the stoichiometry. All the solid ingredients are
a.	Metering and control of quantities of active ingredients to minimize waste.	charged after proper weighment only. All these meters and weighing machines are calibrated and records are maintained.
b.	Reuse of by-products from the process as raw materials or as raw materials substitutes. Use of automated and close filling to minimize spillages	 Recovered solvents are being used as raw material in further steps. Filling is done on weighing balance manually but in controlled manner to minimize spillage. All reactors are in close loop and connected with condensers having cooling tower water, Chilled water or Brine water supply for control of fugitive emission.



Sr.	Condition	Compliance
No.		
d.	Use of close feed system into batch	All the reactors are equipped with vents/stacks, which are connected to either vapor
	reactors.	recovery system consisting of condensers, ejector/vacuum pumps and/or scrubbers.
e.	Venting equipment through vapour	Many equipment like reactors, spray dryers, condenser wherever necessary are
	recovery system.	being cleaned with high pressure sparger/jet to reduce waste water generation.
f.	Use of high pressure hoses for cleaning	Preventive Maintenance of Equipment's is being carried out as per Standard
	to reduce wastewater generation.	Operating Procedure.
g.	Recycling of washes to subsequent	
	batches.	
h.	Recycling of steam condensate.	
i.	Sweeping/mopping of floor instead of	
	floor washing to avoid effluent	
	generation.	
j.	Regular preventive maintenance for	
	avoiding leakage, spillage etc.	
B.2.7	GREEN BELT AND OTHER PLANTATION	i:
96	The unit shall develop green belt within	Noted and compliance assured.
	premises as per the CPCB guidelines.	Green belt development and tree plantation is carried out inside the plant premises to
	However, if the adequate land is not	increase the bio-diversity of the area. In future more plantations will be carried out.
	available within the premises, the unit	
	shall take up adequate plantation on	Photographs of existing greenbelt are attached in point no. 13.
	road sides and suitable open areas in	
	GIDC estate or any other open areas in	
	consultation with the GIDC/ GPCB and	
	submit an action plan of plantation for	



Sr. No.	Condition	Compliance
	next three years to the GPCB.	
97	Drip Irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.	Noted and compliance assured. We are using low-volume, low-angle sprinkler system for the green belt development within the premises.
B.3 0	OTHER CONDITION :	
98	Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC vide no. F. No. 22-34/2018-IA III dated 09/08/2018 for Pharmaceutical and Chemical industries mentioned at (Sr. no XX).	Noted and compliance assured.
99	The provisions of the Solid Waste Management Rules, 2016, e-Waste (Management) Rules, 2016, the Construction and Demolition Waste Management Rules, 2016 and the Plastics Waste Management Rules, 2016 shall be followed.	Noted and being ensured.
100	Rain water harvesting (Off-site) shall be undertaken to conserve fresh water as well as to recharge ground water.	Not applicable. Unit is not consuming ground water.



Sr.	Condition	Compliance
No.		
	Before recharging the surface run off, pre-treatment must be done to remove	
	suspended matter. (Applicable for units	
	consuming ground water 250 KLD in	
	line with the prevailing guidelines of	
	SPCB).	
101	The unit shall join and participate	Noted.
	financially and technically for any	
	common environmental facility /	
	infrastructure as and when the same is	
	taken up either by the Industrial	
	Association or GIDC or GPCB or any	
	such authority created for this purpose	
	by the Govt. / GIDC.	
102	Application of solar energy shall be	Noted and will be complied.
	incorporated for illumination of common	·
	areas, lighting for gardens and street	
	lighting in addition the provision for	
	solar water heating system shall also	
	be provided.	
102	The green engined are green;	Nietzał gwał gowentian se grouwed
103	9	Noted and compliance assured. Dedicated green belt area is embarked for plantation.
	shall be used only for plantation and	Dedicated green beit dred is embarked for plantation.
	shall not be altered for any other	



Sr. No.	Condition	Compliance
1101	purpose.	
104	All the commitments / undertakings given to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.	Noted. All the recommendations / commitments made during the appraisal of the project will be implemented for EC project.
105	The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose for the environmental protection and management.	Noted. Unit assures to comply with any additional conditions that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose of environmental protection and management.
106	In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.	Noted. Unit has provided the system to close down the operation in the event of failure of any pollution control equipment.
107	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory	Noted and being ensured. We have been following all the conditions given by GPCB. The GPCB's Schedule 1 environment auditor also verifies compliance with specified conditions on a regular basis.



Sr. No.	Condition	Compliance
140.	authority.	
108	During material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic waste water or storm water.	Noted and compliance assured. Liquid material transfer is done in closed system (pipelines) or closed containers/ barrels. There are separate drain constructed for domestic waste water/storm water and waste water to avoid mixing of accidental spillages with domestic wastewater or storm water.
109	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	Noted and compliance assured. Pucca flooring/ impervious layer is provided in the work areas, chemical storage areas and chemical handling areas to prohibit soil contamination.
110	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.	Noted and compliance assured. Unit is using only mechanical seal pumps in order to avoid the leakages.
111	No further expansion or modifications in the plant likely to cause environmental impacts shall be carried out without obtaining prior Environment Clearance from the concerned authority.	Noted. No further expansion or modifications will be carried out in the plant without obtaining prior Environment clearance from the concerned authority.
112	The above conditions will be enforced, inter-alla under the provisions of the Water (Prevention & Control of Pollution Act, 1974, Air (Prevention &	Noted and compliance assured. We have applied for CTO amendment for the EC project and approval is awaited. However, we are having valid CCA, CCA No. AWH 127625 and PLI policy vide UIN number - IRDAN190P0076100001, valid up to 31/03/2024 11:59:59 PM under the



Sr.	Condition	Compliance
No.	Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	provision of the Public Liability Insurance Act, 1991 along with their amendments and rules.
113	The project proponent shall comply all the conditions mentioned in The Companies (Corporate Social Responsibility Policy) Rules, 2014 and its amendments from time to time in a letter and spirit.	Agreed and Noted.
114	The project management shall ensure that unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.	Noted and compliance assured. Unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report.
115	The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA as well as GPCB along with the	Noted and compliance assured. Adequate funds are allocated for compliance of all conditions and OPEX are also provided to sustain compliance level on continuous basis.



Sr.	Condition	Compliance			
No.					
	implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	A separate budget is being allocated every year to comply with all the legal requirement stipulated by SPCB, CPCB and MoEF&CC apart from upkeep of pollution control systems and facilities. Total expenditure for the report period is given in below table:			
	diffy other purpose.	Period	Particular	Expenses Rs.in lakh	
			Effluent treatment	51.79	
		April 2022 Contambor 2022	EMS Monitoring	0.37	
l		April 2023 – September 2023	Horticulture	1.39	
			Miscellaneous	0.46	
			Total	54.01	
116	The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the GPCB and may also be seen at the Website of SEIAA/ SEAC/ GPCB. This shall be advertised within seven days from the date of the clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in the Gujarati language and the other in English. A copy each of the same shall be forwarded to the concerned Regional Office of the Ministry.	leading newspapers. Copy of the same was submitted	l to local Government au	out the grant of EC in following tw athorities [i.e. Atul gram panchaya and to regional office of MoEF&C	



of false/fabricated data and failure to

Condition Compliance Sr. No. **Group booked for holding agitations against inflation** Gujarat Pollution Control Board bags was the store Local | vernacular language: English language: "Sandesh" dated July 06, 2021 "Times of India" dated July 06, 2021 It shall be mandatory for the project Noted and Complied. We regularly submit half-yearly compliance report in respect of the stipulated prior management to submit half-yearly environmental clearance terms and conditions through E-mail to the concerned regulatory compliance report in respect of the authority. stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1^{st} |une and 1^{st} December of each calendar year. 118 Concealing factual data or submission Agreed and Noted.



Sr. No.	Condition	Compliance
	comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.	
119	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	Noted. We are complying with all the stipulations made by the Gujarat Pollution Control Board.
120	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	Noted and Agreed.
121	The company in a time bound manner shall implement these conditions. The SEIAA reserves the right to stipulate additional conditions, if the same is found necessary.	Noted and compliance assured Company is implementing these conditions in a time bound manner.
122	The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Noted and compliance assured



Sr. No.	Condition	Compliance
123	This environmental clearance is valid for seven years from the date of issue.	Noted and Agreed.
124	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Noted and Agreed.
125	Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application makes this environment clearance cancelled.	Noted and Agreed.



Period: April 2023 to September 2023

Project: Change in product mix of organic chemicals.

No.	Condition	Compliance	Compliance					
	ecific Condition	1						
i	The industrial effluent generation shall not exceed 326.8 m³/d. (Total process effluent generation after expansion will be 588.6 m³/d- ref. point 4 of EC)	addition of new According to sp dated June 24 450.50 KLD.	However, since we have another EC granted in June 2021 for expansion addition of new products, we request to consider latest figures given in sale According to specific condition No .17 of EC No. SEIAA/GUJ/EC/5(f)/965/20 dated June 24, 2021, Industrial waste water generation shall not exceed the supplies that the supplies in the second states are supplied to the supplies that the supplies in the supplies that the supplies in the supplies in the supplies in the supplies that the supplies in					
		Wastewater generation m³	April 2023	May 2023	June 2023	July 2023	August 2023	Septembe r 2023
		m³/ Month	2298	1564	1499	1490	1800	1872
		m³/day	76.6	50.45	49.97	48.06	58.06	62.4
		Wastewa generation		Stipulate value		s for the pe 2023 - Sept		23
					Min.			
		Wastewa generation		450.5	48.06	76.6	5 5	3.8
	Out of 326.8 m³/d, 24 m³/d of high COD effluent shall be incinerated in the incinerator (of Atul Ltd as stated in point 4 of EC)	Complied. We have been segregating high COD streams (COD >50000 ppm) and same is being taken for recovery to get economic benefit. Rest lean effluent of COD <2000 ppm is finally sent to ETP for treatment. All the high COD streams are being diverted to recovery system rather than incineration. Streams containing Solvents, oils, etc. are taken for the recovery of the same and reused. Hence, there is no High COD Waste water stream remaining and therefore no incineration was done during this period.						
	Remaining 302.8 m³/d of normal effluent stream after mixing with other effluent like cooling tower (111.8 m³/d) shall	Complied. Normal effluen Ltd. (Ref. Point					Treatmen	t Plant of Atul



Period: April 2023 to September 2023

primary	and	secondary
treatmer	nt	

The treated effluent after confirming to the prescribed standards shall be discharged into estuary of river Par through a 4km long pipe line.

Complied.

The treated effluent after confirming to the prescribed standards is being discharged into estuary of river Par through a 4km long pipe line of Atul Ltd. (Ref. Point 4 of EC). The discharged effluent is meeting all pollution board limits and values of various parameters of treated effluent is given in **Table 1**.

The maximum values during the compliance period confirms that at no time the emission went beyond the stipulated standards. Summary is given below:

Sr.	Parameter	Norms	Values fo	r the perio	d	
No.			April 2023 - September 2023			
			Min.	Max.	Avg.	
1	рН	5.5 to 9.0	6.89	7.15	7.0	
2	Temperature °C	40 °C	30.4	31.6	31.1	
3	Suspended solids mg/l	100	41	61	49.9	
4	Oil and Grease mg/l	10	2.8	5.4	4.0	
5	Phenolic Compounds	5	0.62	0.89	0.7	
6	Cyanides mg/l	0.2	ND	ND	ND	
7	Fluorides mg/l	2	0.74	1.24	0.9	
8	Sulphides mg/l	2	0.36	0.8	0.5	
9	Ammonical Nitrogen mg/l	50	5.97	9.63	7.9	
10	Arsenic mg/l	0.2	ND	ND	ND	
11	Total Chromium mg/l	2	0.062	0.79	0.2	
12	Hexavelent Chromium mg/l	1	ND	ND	ND	
13	Copper mg/l	3	0.17	0.45	0.3	
14	Lead mg/l	2	ND	ND	ND	
15	Mercury mg/l	0.01	ND	ND	ND	
16	Nickel mg/l	5	0.17	0.26	0.2	
17	Zinc mg/l	15	0.54	0.91	0.7	
18	Cadmium mg/l	2	ND	ND	ND	
19	Phosphate mg/l	5	1.62	2.41	2.0	
20	BOD (3 days at 27°C) mg/l	100	47.17	74	54.9	
21	COD mg/l	250	206	232	220.3	
22	Insecticide/Pesticide	Absent	Absent	Absent	Absent	
23	Sodium Absorption Ratio	26	4.45	9.2	6.0	
24	Manganese mg/l	2	0.079	0.24	0.1	
25	Tin mg/l	0.1	ND	ND	ND	



		26	Bio Assay Test	90% survival of fish after 96 hrs. in 100% effluent	100% survival of fish after 96 hrs. in 100% effluent	100% survival of fish after 96 hrs. in 100% effluent	100% survival of fish after 96 hrs. in 100% effluent
ii	Process emissions in the form of HCI shall be scrubbed with water and caustic scrubber and HCI recovered as by product.	Complied. Process emissions in the form of HCI is scrubbed with water and caustic scrubber and set to ETP.					
	The emissions shall be dispersed through stack of adequate height as per CPCB standards.	· ·					
	The gaseous emissions from the DG sets shall be dispersed through stack of adequate height as per CPCB standards.	Complied. The gaseous emission from the DG sets is dispersed through stack of adequate height as per CPCB standards. The minimum height of stack is provided using the following formula (ref.					
	Acoustic enclosures shall be provided to the DG set to control the noise pollution.		ed. is having inbuilt acou	stic enclosure	e to control	noise pollu	ition.
iii	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.	The sto	ed. atus of compliance of ng results of mon atulbio.co.in				

Period: April 2023 to September 2023

It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and the State Pollution Control Board.

Complied.

Compliance status report is regularly submitted to the Regional office of MOEF, the respective Zonal office of CPCB and the State Pollution Control Board.

The criteria pollutant levels namely: SPM. RSPM. S02. NOx (ambient levels as well as stack emissions) or critical sectorial parameters like VOC indicated for the project shall be monitored and displayed at convenient location near the main gate of the company in the public domain.

Complied.

The critical pollutants parameters are monitored regularly on monthly basis and displayed at board at the company entrance.

Details of stack results, ambient air monitoring and VOC measured in fugitive emission is given in **Table 2, 3 and 4** respectively.

The maximum values during the compliance period confirms that at no time the emission level went beyond the stipulated standards.

Summary of stack results:

Sr. No.	Parameter	Standard limit as per CCA	Unit	Values for the period April 2023 - September 2023		
				Min.	Max.	Avg.
1	HCI	20	mg/Nm ³	4.93	6.37	5.33
2	Cl ₂	9		4.40	6.20	5.08

Summary of Ambient Air Quality results:

Station	Parameter	Limit	Values for the period		
		micro	April 20	April 2023 - September 2023	
		gm/NM³	Min.	Max.	Avg.
Near	PM _{2.5}	60	49.1	57.9	54.47
MPP 1	PM ₁₀	100	89.6	96.3	92.78
Plant	SO ₂	80	11.5	16.2	14.53
	NO ₂	80	25.2	31.6	28.17
	CO	02	0.24	0.80	0.47
Near	PM _{2.5}	60	44.7	53.7	50.42
MPP 2	PM ₁₀	100	81.8	91.7	85.62
Plant	SO ₂	80	10.8	13.7	12.72
	NO ₂	80	21.7	28.4	25.97
	CO	02	0.30	0.64	0.50
66 KV	PM _{2.5}	60	22	50	33.33
	PM ₁₀	100	48	82	59.50
	SO ₂	80	13.3	24.4	18.70
	NO ₂	80	18.2	30.7	26.30
Opposite	PM _{2.5}	60	31.9	51.7	35.72
Shed D	PM ₁₀	100	52.3	89.6	62.10
	SO ₂	80	16.7	24.6	20.35



Period: April 2023 to September 2023

		1			
	NO ₂	80	22.2	30.5	28.60
Near West	PM _{2.5}	60	29	39	31.50
site ETP	PM ₁₀	100	43	78	56.50
	SO ₂	80	11.5	26.9	17.88
	NO ₂	80	16.3	32.6	24.38
Near	PM _{2.5}	60	24	45	29.83
North ETP	PM ₁₀	100	43	80	51.83
	SO ₂	80	12.4	23.4	16.90
	NO ₂	80	19.1	27.9	25.28
TSDF	PM _{2.5}	60	24	43	30.00
	PM ₁₀	100	49	79	56.33
	SO ₂	80	12.3	19.3	15.32
	NO ₂	80	17.3	30.7	24.80
Main	PM _{2.5}	60	32.5	50.8	36.57
Guest	PM ₁₀	100	53.3	88.6	62.62
House	SO ₂	80	15.5	30.4	21.15
	NO ₂	80	19.3	29.8	25.13
Wyeth	PM _{2.5}	60	22	44	31.00
Colony	PM ₁₀	100	41	72	54.17
	SO ₂	80	12.9	23.4	18.32
	NO ₂	80	18	29.7	24.30
Gram	PM _{2.5}	60	30.6	48.7	35.82
panchayat	PM ₁₀	100	52.3	88.6	63.00
hall	SO ₂	80	15.6	26.4	20.50
	NO ₂	80	22.3	32.6	28.42
Main	PM _{2.5}	60	29.3	60.2	35.85
office,	PM ₁₀	100	50.3	88.1	60.83
North site	SO ₂	80	15.3	23.6	20.28
	NO ₂	80	18.6	32.6	27.55
Haria	PM _{2.5}	60	29.4	51.3	35.05
water tank	PM ₁₀	100	52.6	84.6	59.95
	SO ₂	80	17.1	30.2	20.85
	NO ₂	80	20.3	29.8	26.42
	1	1	1	L	I

Summary of VOC results:

Summary of VOC results.						
Location	Parameter	Permissible limit	Values for the period April 2023 – September 2023			
			Min.	Max.	Avg.	
Ground Floor	Chlorine	3 mg / Nm³	ND	ND	ND	
MPP2	Toluene	150 ppm	25	115	77.33	



iv	The company shall adopt cleaner production technology to minimize the quantity of fresh water requirement and process effluent generation.	Complied. Steam condensate is being collected and used in place of raw water. Various wash water streams are being utilized in the further steps of the process.
V	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 for management of hazardous wastes and prior permission from GPCB shall be obtained for disposal of solid / hazardous waste in the TSDF.	Complied. We have obtained authorization under Haz. Waste management rules 2016 and available in our valid current CCA No. AWH 127625 for handling, storage and disposal of hazardous waste.
	The concerned company shall undertake measures for firefighting facilities in case of emergency.	Compiled. We have well established fire hydrant network. We have mutual aid with parent company - Atul Ltd for emergency help, which is located just besides our company. Atul Ltd has three nos. of fire tenders, fully adequate hydrant system and trained staff, emergency response team(ERT) of trained workers, power supply from two source with emergency backup power provision from DG set as well grid. We have detailed on-site emergency plan. Mock drills are also being carried out at regular interval. Last mock drill was conducted on June 27, 2023.
vi	The project authorities shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals Rules. 1989 as amended in October, 1994 and January, 2000.	Complied. We are complying with all the requirement of MSIHC rule 1989 as amended in October, 1994 and January, 2000 and having proper storage and handling system, Onsite emergency plan, Licenses, reporting, etc. The company complies with all stipulated norms mentioned in CCA by GPCB in this regard. This has been certified by our Environmental auditors, an authorized agency and nominated by GPCB; through Environmental audit every year.



	All Transportation of Hazardous Chemicals shall be as per the MVA 1989.	Complied. Transportation of Hazardous chemicals are being done as per the MVA 1989.
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.	Complied.
	Use of automated filling to minimize spillage.	Complied. Filling is done on weighing balance manually but in controlled manner to minimize spillage.
	Use of "Close Feed' system into batch reactors.	Complied. All reactors are in close loop and connected with condensers having cooling tower water, Chilled water or Brine water supply for control of fugitive emission.
	Venting equipment through vapor recovery system.	Complied. All the reactors are equipped with vents/stacks, which are connected to either vapor recovery system consisting of condensers, ejector/vacuum pumps and/or scrubbers.
	Use of high pressure hoses for equipment clearing to reduce wastewater generation.	Complied. Many equipment like reactors, spray dryers, condenser wherever necessary are being cleaned with high pressure sparger / jet to reduce waste water generation.
viii	Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored.	Complied. Fugitive emissions in the work zone environment and raw material storage area is being regularly monitored by GPCB approved third party. The emission is always being confirmed to the limits.
	The emissions shall conform to the limits	Complied. The emissions confirms the limits. The maximum values during the



	imposed by SPCB.	compliance period confirms that at no time the emission level went beyond the stipulated standards. Summary of stack results given in specific condition no. iii. The detailed results are given in Table 2.
ix	The project authorities shall provide the chilled brine solution in secondary condenser for condensation of the VOCs.	Complied. Chilled brine solution is provided in secondary condenser for condensation of the VOCs.
	The project authority shall ensure that the solvent recovery shall not be less than 95%.	Complied. Solvent recovery is >95%.
	The VOC monitoring shall be carried in the solvent storage area and data submitted to the Ministry.	Complied. We are monitoring VOC as well as other chemicals in work area as per Factories Act and records are being maintained in For No. 37.VOC monitoring done on regular bases and the results are given in Table 4.
x	Solvent management shall be as follows:	
	Reactor shall be connected to chilled brine condenser system	Complied. Reactors are connected to chilled brine condenser system.
	Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	Complied. Reactor and solvent handling pump do have mechanical seals to prevent leakages.
	The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.	Complied. The condensers are provided with sufficient HTA and residence time.
	Solvents shall be stored in a separate space specified with all safety measures.	Complied. Solvents are stored in tank farms in separate tanks with proper earthing, flame arresters, lightening arresters, fencing, Fire hydrant system, Fire extinguishers, flame proof equipment, etc. safety measures.
	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	Complied. Double earthing is provided and regular checking and testing of the same is being done and recorded.



EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009. Period: April 2023 to September 2023 Entire plant shall be Complied. flame proof. The solvent Plants are equipped with Jumpers, flame proof electrical fittings and proper earthing as per the Hazardous area classification of PESO. storage tanks shall be provided with breather valve to prevent losses. Complied. хi Hazardous chemicals shall be stored in tanks in Hazardous chemicals are being stored in tanks, drums and carboys tank farms, drums. considering the storage quantity and chemical stored. carboys, etc. An area of 33% green Complied. belt and selection of Company is having green belt in 33% area of plant and doing plantation every plant species shall be as vear. per the guideline of CPCB. The Company χij shall Complied. harvest surface as well We have installed 120 KL underground tank and 2 nos of 30 KL overhead as rainwater from the tank to collect rain water from roof tops. rooftops of the buildings and storm drains water recharge the ground water and use the same water for the various activities of the project to conserve fresh water. xiii Occupational health Complied. surveillance of the Occupational health surveillance of the workers being carried out on regular workers shall be basis. carried out on a regular basis and records shall be maintained as per the Factories Act. **B.** General Conditions The project authorities Complied. shall strictly adhere to The company adheres to the compliances and has not exceeded the the stipulations made by stipulation. This has been certified by our Environmental auditors, an the GPCB. authorized agency and nominated by GPCB; through Environmental audit every year. ii No further expansion or Complied. modification in the plant Any expansion will be carried out after prior approval of MoEF only.

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.	
iii	At no time, the emissions	Complied.
	shall exceed the prescribed limits.	Monthly monitoring is being done by GPCB approved, NABL approved agencies. At no time, the emissions exceeded the prescribed limits during report period. Summary of stack emission is given in special condition iii.
	In the event of failure of	Complied.
	any pollution control	No such case happened during the compliance period.
	system adopted by the	
	units, the unit shall be	
	immediately put out of operation and shall not	
	be restarted until the	
	desired efficiency has	
	been achieved.	
iv	The Gaseous emission	·
	(NOx, HCl, SO2 and	9
	matter along with RSPM	prescribed by GPCB through CCA Gaseous emission is regularly monitored. Results given in Table 2 .
	levels from various	results given in Tuble 2.
	process units shall	
	confirm to the standards	
	prescribed by the	
	concerned authorities	
	from time to time.	Complied
	At no time, the emission levels shall go beyond	Complied. The maximum values during the compliance period confirms that at no time
	the stipulated standards.	the emission level went beyond the stipulated standards.
	ouparated otariadidor	Summary of stack emission is given in special condition iii.
		, ,



	In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restricted until the control measures are rectified to achieve the	Complied. No such case happened during compliance period. Whenever such incident of failure of pollution control system happened, we will stop the operation and rectify the problem and then only restart.				
	desired efficiency. Stack monitoring for SO2, NOx and SPM shall be carried.					
V	The Location of ambient air quality monitoring stations shall be decided in consultation with stated pollution control Board and it shall be ensured that at least one station is installed in the up wind and downwind direction as well as where maximum ground level concentration are anticipated.	Complied. There are two locations have been decided in consultation with GPCB so that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentration are anticipated for ambient air monitoring. The same had been shown to authority like SPCB, CPCB & MoEF during their visit to our factory. List of our ambient air monitoring station is given below: Sr. No. Location 1 MPP 1 Plant 2 MPP 2 Plant				
		Apart from this, 10 ambient air stations of Atul Ltd also monitors the surrounding of ABL.				
vi	Dedicated Scrubbers and stacks of appropriate height as per the central pollution control board guideline shall be provided to control the emission from various vents. The scrubber water shall be sent to ETP for further treatment or sell to actual end users.	Complied. Dedicated Scrubbers and stacks of appropriate height as per the central pollution control board guideline have been provided to control the emission from various vents. Details of stack results along with its height data is given in Table 2. Complied. The scrubber water is being sent to ETP for further treatment.				
∨ii	The overall noise level in and around the plant area shall be kept well within the standard by providing noise control measures including acoustic hoods silencers, enclosures etc. on all source of noise	Complied. In built Acoustic enclosure, silencer and insulation are provided on all source of noise generation to keep over all noise level within the stipulated standards like DG set, etc.				



Period: April 2023 to September 2023

generation.

The ambient noise level shall confirm to the standards prescribed under Environment(Protection) Act-1986 Rules,1989 viz 75 dBA (day time) and 70 dBA (night time).

Complied.

The ambient noise level confirm to the standard prescribed under EPA. The maximum values during the compliance period confirms that at no time the emission level went beyond the stipulated standards.

Noise level monitoring data (Day Time):

Sr. No.	Location	Permissible Limits, dBA		or the peri September	
		75	Min.	Max.	Avg.
1	66KVA substation	75	67.1	70.3	68.48
2	Opposite shed D	75	60.4	63.6	61.67
3	ETP West site	75	64.5	66.4	65.50
4	ETP North site	75	58.8	60.9	59.65
5	Near TSDF	75	63.8	66.9	65.25
6	Near Main Office North site	75	65.7	69.7	67.42

Noise level monitoring data (Night Time):

Sr. No.	Location	Permissible Limits, dBA	Values for the period April 2023 – September 2023		
			Min.	Max.	Avg.
1	66KVA substation	70	52.4	59.3	56.05
2	Opposite shed D	70	50.1	52.5	51.67
3	ETP West site	70	56.9	58.9	57.75
4	ETP North site	70	51.3	61.3	56.93
5	Near TSDF	70	51.4	54.3	52.70
6	Near Main Office North site	70	53.8	60.7	57.78

Details are given in Table 5 and 6.

viii Training shall be imparted to all employees on safety and health aspects of chemicals handling.

Complied.

Company is imparting training to all new employees as well as regular employees at regular intervals. Safety precautions and hazards are also being communicated through display boards at appropriate places in the plants.



	Pre-employment and routine periodical medical examination for all employees shall be undertaken on regular basis.	Complied. Company is doing all the new employment with pre medical checkup and routine medical checkup for on role employee has been done on regular frequency.
ix	Usage of PPE's by employee/ workers shall be ensured.	Complied. Company have PPE policy in place and strictly follow for all level of employee.
X	The project proponent shall also comply with all the environmental protection measures and safeguards proposed in project report submitted to the ministry.	Complied. Company has complied with all the environmental protection measures and safeguards proposed in the report apart from the recommendations made their in.
	All the recommendation made in respect of environmental management and risk mitigation measures relating to the project shall be implemented.	Complied. Since the project did not require EIA or public hearing, no such recommendations mentioned. However, we are committed for healthy work environment and safe work practices.
xi	The company will undertake all relevant measures for improving the socio economic condition for the surrounding area, CSR activities will be undertaken by involving local villages and administration.	Complied. Company is doing CSR activities for upgradation of surrounding area and well fare of nearby localities.
xii	The company shall undertake eco developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Complied
xiii	A Separate environmental management cell equipped with full	Complied. Company has tie up with its parent company Atul Limited where separate Environmental Management Cell equipped with full-fledged laboratory facilities to carry out the environment management and monitoring functions.



xiv	flagged laboratory facility shall be set up to carry out the environmental management and monitoring function. The project authorities shall provide adequate funds both recurring and non-recurring to implement the conditions stipulated by the Ministry of Environment and Forest as well as the State Government along with	Recurring cost: A separate budget requirement stipular	ced by SPCB, CPCB & M	y year to comply with all the legal loEF apart from upkeep of pollution diture for the report period is given
	the implementation	Period	Particular	Expenses Rs. (in lacs)
	schedule for all the conditions stipulated	April 2023 –	Effluent treatment	51.79
	conditions stipulated herein. The funds so	September 2023	EMS Monitoring	0.37
	provided shall not be diverted for any other purposes.			
xv	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila parishad/Municipal Corporation. Urban local body and the local NGO, if any, from who suggestions/representati on, if any, were received while processing the proposal.	was distributed on		parishad, District Industrial Centre opy of the same was submitted to t/3 dated April 4, 2017
	The clearance letter shall also be put on the web site of the company by the proponent.	·	ny's website www.atul	bio.co.in
xvi	The implementation of the project vis-à-vis environmental action plan shall be monitored by Ministry's Regional office at Bhopal / SPCB / CPCB.		monitoring through thei	r regular visits.
xvii	The Project Proponent	Complied.		



	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 of Environment and Forest at http://www.envfor.nic.in.	We informed the public through advertisement and by sending our EC to local Panchayat, Zila parishad, District Industrial Centre for further actions at their end.
	This shall be advertised within seven days from the date of issue of the clearance letter at least in two local newspaper 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 Ministry's Regional office at Bhopal.	Complied. Advertisement was published and copy of the same was submitted to Ministry vide our letter Atul/SHE/MoEF/Visit/3 dated April 4, 2017.
xviii	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closures and final approval of the project by the concerned authorities and the date of start of the project.	Complied. Start date: April 2009 Completion date: March 2010 Final approval: We have obtained NOC and CCA from GPCB. Company has funded the project internally and hence not submitted the financial closure details.
9	The Ministry may revoke or suspend the clearance if implementation of any of the above conditions is not satisfactory.	Noted.



10	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Noted.
11	Any appeal against this Environment clearance shall lie with the national appellate authority, if preferred, within a period of 30 days as prescribed under section 11 of National Environment Appellate Authority Act, 1997.	Noted.
12	The above conditions will be enforced, interalia under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 the Air ((Prevention and Control of Pollution) Act, 1981 the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Noted.



Table 1: Quality of Treated Effluent

Sr. No.	Parameter	Results						GPCB Norms
INO.		April 2023	May 2023	June 2023	July 2023	August 2023	Septem ber 2023	NOTHIS
1	рН	7.15	6.98	6.92	7.12	6.93	6.89	5.5 to 9.0
2	Temperature	30.6	31.2	31.6	31.4	30.4	30.8	40 °C
3	Suspended solids mg/l	42	57	51	41	61	54	100
4	Oil and Grease mg/l	5.4	4.6	3.9	2.8	3.4	4.2	10
5	Phenolic Compounds	0.72	0.89	0.73	0.62	0.82	0.76	5
6	Cyanides mg/l	ND	ND	ND	ND	ND	ND	0.2
7	Fluorides mg/l	0.75	0.94	1.02	1.24	0.99	0.74	2
8	Sulphides mg/l	0.6	0.42	0.36	0.4	0.8	0.4	2
9	Ammonical Nitrogen mg/l	9.4	5.97	8.14	7.23	6.85	8.24	50
10	Arsenic mg/l	ND	ND	ND	ND	ND	ND	0.2
11	Total Chromium mg/l	0.062	0.089	0.093	0.081	0.096	0.13	2
12	Hexavelent Chromium mg/l	ND	ND	ND	ND	ND	ND	1
13	Copper mg/l	0.17	0.22	0.25	0.35	0.41	0.32	3
14	Lead mg/l	ND	ND	ND	ND	ND	ND	2
15	Mercury mg/l	ND	ND	ND	ND	ND	ND	0.01
16	Nickel mg/l	0.17	0.2	0.19	0.26	0.19	0.21	5
17	Zinc mg/l	0.56	0.67	0.58	0.84	0.91	0.54	15
18	Cadmium mg/l	ND	ND	ND	ND	ND	ND	2
19	Phosphate mg/l	1.62	1.94	2.06	1.85	2.18	2.41	5
20	BOD (3 days at 27°C) mg/l	48	74	61	58.3	47.17	48.13	100
21	COD mg/l	206	226	224	212	232	212	250
22	Insecticide/Pesticide	Absent	Absent	Absent	Absent	Absent	Absent	Absent
23	Sodium Absorption Ratio	4.45	5.24	7.39	5.01	4.6	5.8	26
24	Manganese mg/l	0.082	0.093	0.11	0.16	0.24	0.13	2
25	Tin mg/l	ND	ND	ND	ND	ND	ND	0.1



26	Bio Assay Test	100%	100%	100%	100%	100%	100%	90%
		survival	survival of	survival of	survival	survival	survival	survival of
		of fish	fish after	fish after	of fish	of fish	of fish	fish after
		after 96	96 hrs. in	96 hrs. in	after 96	after 96	after 96	96 hrs. in
		hrs. in	100%	100%	hrs. in	hrs. in	hrs. in	100%
		100%	effluent	effluent	100%	100%	100%	effluent
		effluent			effluent	effluent	effluent	
	Note: ND is Not Detected.							

Table 2: Stack Results

Stack	Stack			Results in Milligram per Nm³						
attached	Height in	Parameter	Permissible limit	April 2023	May 2023	Γ	r -	August 2023	Septembe r 2023	
	Meter									
MPP1	12 M	HCI	20 mg/ Nm ³	5.03	5.18	4.93	5.24	5.24	6.37	
		Cl ₂	9 mg/ Nm ³	4.9	4.40	4.80	5.10	5.10	6.20	

Table 3: Ambient Air Monitoring Details

Station	Parameter	Limit µg/NM³	April 2023	May 2023	June 2023	July 2023	August 2023	Septemb er 2023
Near MPP I Plant	PM _{2.5}	60	56.8	55.3	57.9	54.9	52.8	49.1
	PM ₁₀	100	91.4	91.8	96.2	89.6	91.4	96.3
	SO ₂	80	14.3	16.2	15.8	13.6	11.5	15.8
	NO ₂	80	27.4	26.4	28.2	30.2	25.2	31.6
	CO	02	0.58	0.48	0.40	0.32	0.24	0.80
Near MPP 2 Plant	PM _{2.5}	60	53.7	50.9	53.2	50.7	49.3	44.7
	PM ₁₀	100	83.4	83.1	91.7	85.2	88.5	81.8
	SO ₂	80	13.1	12.4	13.2	13.1	10.8	13.7
	NO ₂	80	26.6	21.7	27.1	28.4	27.1	24.9
	CO	02	0.64	0.52	0.54	0.54	0.30	0.45
66 KV	PM _{2.5}	60	50	49	26	22	26	27
	PM ₁₀	100	59	82	50	48	58	60
	SO ₂	80	24.4	18.4	13.3	15.7	19.7	20.7
	NO ₂	80	30.7	22.9	18.2	26.5	29.1	30.4
Opposite	PM _{2.5}	60	32.4	51.7	32.6	32.9	32.8	31.9
Shed D	PM ₁₀	100	52.3	89.6	55.5	53.6	60.8	60.8
	SO ₂	80	23.9	24.6	16.7	20.7	19.3	16.9
	NO ₂	80	30.5	30.5	22.2	29.7	28.9	29.8
Near West site ETP	PM _{2.5}	6	30	39	29	29	30	32
LIF	PM ₁₀	100	52	78	43	55	60	51



	SO ₂	80	26.9	20.3	11.5	16.8	14.9	16.9
	NO ₂	80	32.6	25.4	16.3	21.6	23.7	26.7
Near North ETP	PM _{2.5}	60	32	45	27	25	24	26
	PM ₁₀	100	49	80	46	43	46	47
	SO ₂	80	18.9	23.4	14.2	12.4	15.7	16.8
	NO ₂	80	25.5	27.9	19.1	27.1	26.4	25.7
TSDF	PM _{2.5}	60	29	43	24	27	28	29
	PM ₁₀	100	56	79	53	51	49	50
	SO ₂	80	19.3	17.6	12.3	16.4	13.4	12.9
	NO ₂	80	26.1	22.2	17.3	23.6	28.9	30.7
Main Guest House	PM _{2.5}	60	36.9	50.8	32.5	32.9	33.4	32.9
	PM ₁₀	100	58.3	88.6	53.3	55.4	60.4	59.7
	SO ₂	80	30.4	24.6	15.5	16.4	19.3	20.7
	NO ₂	80	25.3	29.8	19.3	26.7	27.1	22.6
Wyeth Colony	PM _{2.5}	60	28	44	22	30	32	30
	PM ₁₀	100	41	72	48	54	56	54
	SO ₂	80	23.4	21.6	12.9	17.7	16.7	17.6
	NO ₂	80	28.8	26.9	18	20.1	22.3	29.7
Gram panchayat	PM _{2.5}	60	36.5	48.7	32.6	31.9	34.6	30.6
hall	PM ₁₀	100	59.3	88.6	52.3	53.7	62.3	61.8
	SO ₂	80	26.4	23.7	15.6	17.3	20.7	19.3
	NO ₂	80	32.6	29.4	22.3	26.8	29.8	29.6
Main office, North	PM _{2.5}	60	33.4	60.2	29.3	29.6	30.7	31.9
site	PM ₁₀	100	56.7	88.1	55.3	58.7	55.9	50.3
	SO ₂	80	23.4	23.6	15.3	19.9	18.8	20.7
	NO ₂	80	32.6	27.8	18.6	26.8	29.8	29.7
Haria water tank	PM _{2.5}	60	32.6	51.3	29.4	30.6	35.6	30.8
	PM ₁₀	100	56.6	84.6	52.6	55.9	57.1	52.9
	SO ₂	80	30.2	23.6	17.1	17.8	18.1	18.3
	NO ₂	80	26.6	29.8	20.3	24.1	29.8	27.9

Table 4: VOC results

Location	Parameter	Permissible		Results of VOCs						
		limit	April	May 2023	June 2023	July 2023	August	Septembe		
			2023				2023	r 2023		
Ground	Chlorine	3 mg/Nm³	ND	ND	ND	ND	ND	ND		
Floor MPP2	Toluene	150 ppm	115	76	100	110	25	38		



Table 5: Noise level monitoring data (Day Time)

Sr.	Location	Noise L	Permissible					
No.		April 2023	-	June 2023	July 2023	August 2023	September 2023	Limits, dBA
1	66KVA substation	67.2	68.2	67.1	68.9	69.2	70.3	75
2	Opposite shed D	63.6	62.3	61.1	60.4	61.3	61.3	75
3	West site ETP	64.5	66.3	65.5	66.4	65.4	64.9	75
4	North site ETP	60.9	59.1	60.3	59.7	58.8	59.1	75
5	Near TSDF	65.9	66.9	65.2	64.3	63.8	65.4	75
6	Near main office North site	66.3	69.7	68.4	65.7	66.3	68.1	75

Table 6: Noise level monitoring data (Night Time)

Sr.	Location	Noise Le	Permissible					
No.		April	May	June	July 2023	August	September	Limits, dBA
		2023	2023	2023		2023	2023	
1	66KVA substation	59.2	58.4	59.3	53.6	52.4	53.4	70
2	Opposite shed D	52.4	52.1	52.5	51.6	50.1	51.3	70
3	West site ETP	56.9	58.8	57.5	58.9	57.1	57.3	70
4	North site ETP	60.4	61.3	51.3	53.3	55.6	59.7	70
5	Near TSDF	52.6	51.4	52.3	51.7	54.3	53.9	70
6	Near main office North site	56.9	58.8	57.3	53.8	59.2	60.7	70