



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

Sr. No	Condition	Compliance
<b>A. Conditions</b>		
<b>A.1 Specific Condition:</b>		
1	PP shall comply conditions of any subsequent amendment or expansion or change in product mix, after the 30 <sup>th</sup> 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.	<b>Noted and compliance assured</b>
2	PP shall carry out proposed 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.	<b>Noted and compliance assured</b>
3	PP shall submit six monthly compliance report of Environmental Clearance without fail and the same shall be critically assessed by the regulatory authority.	<b>Complied.</b> We assure to regularly submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions through E-mail as well as in hard copy to the concerned regulatory authority, on or before 1 <sup>st</sup> June and 1 <sup>st</sup> December of each calendar year.



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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.	<b>Noted and will be complied.</b> The ZLD system is under commissioning stage. ABL ETP has been commissioned and in use presently and treated effluent is being sent to Atul Ltd's for final discharge as per point 4 of EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009. Effluent trail is ongoing in the UF-RO system, and water followed by effluent trail is going on in MEE to achieve ZLD.  At present, 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 of Atul Ltd for treatment.
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.	<b>Noted and will be complied for proposed project</b> 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.	<b>Noted and compliance assured</b> 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 premises by any means.	<b>Noted and will be complied</b> with as the ZLD system is under commissioning stage. Effluent trail is ongoing in the UF-RO system, and water followed by effluent trail is going on next month in MEE. We assure that we will start production as per the new EC only after fully commissioning of ZLD system.



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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.	<p><b>Noted and complied.</b> 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.</p> <p>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.</p>
9	PP shall obtain raw water permission for explanation project from competent authority before start expansion production activity.	<p><b>Noted and compliance assured.</b> Water required for the proposed expansion project is being obtained from River water (Par River). Necessary permission is already obtained.</p>
10	PP shall not dig bore well within premises as per details submitted by PP and shall abstract raw water from ground water source, i.e. bore well within premises after obtain permission from CGWA.	<p><b>Noted and compliance assured.</b> There is no ground water source (bore well or any) within industry premises.</p>
11	PP shall strictly adhere and complying agreement made by PP for power and steam requirement for proposed project, form nearby sister concern unit M/s Atul Ltd as per agreement	<p><b>Noted and compliance assured.</b></p>






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	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.	<b>Noted and will be complied</b>
13	The PP shall developed green belt within premises (12855 m <sup>2</sup> 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.	<b>Noted and compliance assured.</b> 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. 



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		 <p>The compliance section contains four photographs arranged in a 2x2 grid. The top-left photo shows a paved walkway lined with a row of small, reddish-brown plants in a raised bed, with industrial structures and a large white tank in the background. The top-right photo shows a paved area with a yellow railing, a large green tree, and a white building. The bottom-left photo shows a grassy area with several young green trees. The bottom-right photo shows a grassy area with a concrete wall and more greenery.</p>
14	Unit shall obtained all required	<b>Not Applicable</b> as acetic anhydride and any such chemicals are not being used by the unit



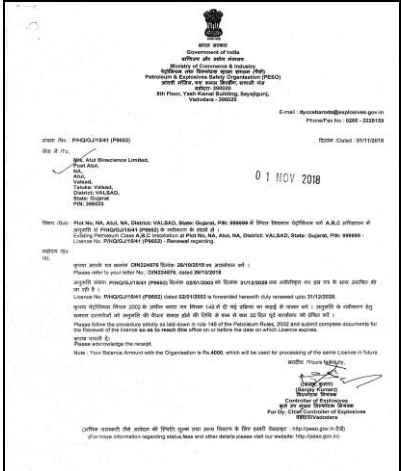
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	permissions from the Narcotics Control Bureau for manufacturing, storage and handling of Acetic Anhydride & any such chemicals	till date. Required permission from the Narcotics Control Bureau will be obtained prior use of Acetic Anhydride & any such chemicals.
<b>15. Safety &amp; Health :</b>		
a)	PP shall provide Occupational Health Center (OHC) as per the provisions under the Gujarat Factories Rule 68-U.	<b>Noted and compliance assured.</b> 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.	We have already applied for fire NOC.
c)	Unit shall adopt functional operations/process automation system including emergency response to eliminate risk associated with the hazardous processes.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> Unit regularly conducts mock drills within the premises. Last mock drill was conducted on January 09, 2023. Report of the mock drill is attached herewith for your ready reference.




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		<p style="text-align: center;">REPORT ON MOCK DRILL</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Date: 09.01.2023</td> <td style="width: 70%;">Time: 08:55 to 09:15 hr</td> </tr> <tr> <td>Location of Incident (silo):</td> <td>Utility block ABL-1</td> </tr> <tr> <td>Type of Incident created for Drill:</td> <td>Ammonia leakage from utility section</td> </tr> </table> <p><b>(A) Communication System:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">Sr. No.</th> <th style="width: 45%;">ACTIONS</th> <th style="width: 50%;">OBSERVATIONS</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Local emergency siren activation (09:00 hrs)</td> <td> <ul style="list-style-type: none"> <li>Operator Mr. Jagan Patel was taking his routine round suddenly block he observed smell of ammonia leakage.</li> <li>Immediately he operated MCP Plant.</li> <li>So he called operator with HCl touch to find leakage source.</li> <li>Plant in charge Mr. Avinab Dutta &amp; safety team rushed the spot after listening siren.</li> <li>Safety team along with Operator and Plant in charge wore BA set to find out possible point of leakage.</li> <li>The area was isolated with barricading tape.</li> <li>Leakage of ammonia gas was found from ammonia charging line.</li> <li>Immediately ammonia gas was stop feeding</li> </ul> </td> </tr> <tr> <td>2</td> <td>Evacuation and area cordoff by IC (Incident Controller)  Traffic controlling  Fire Fighting operation</td> <td> <ul style="list-style-type: none"> <li>IC (Mr. Avinab Dutta) instructs to ERT member for area cordoned off.</li> <li>On listening the siren, security officer instructed to guard for traffic control at affected area.</li> <li>Safety Officer with Fire officer visited the spot and instructed person to wear BA Set.</li> <li>After consulting with IC, safety officer inform operator to turn off Ammonia supply.</li> <li>Plant in charge gave confirmation for ammonia supply stoppage.</li> </ul> </td> </tr> </tbody> </table> <p><b>(B) Response time:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Emergency team members:</td> <td></td> </tr> <tr> <td>Fire dept. (Mr. Rakesh Dubey and team)</td> <td>09:03 hrs.</td> </tr> <tr> <td>Incident Controller (Mr. Avinab Dutta) ERT team</td> <td>09:08 hrs.</td> </tr> <tr> <td></td> <td>09:04 hrs.</td> </tr> <tr> <td>Emergency declared as "Local" emergency.</td> <td>09:00 hrs.</td> </tr> <tr> <td>Medicines:</td> <td>09:03 hrs.</td> </tr> <tr> <td>Ambulance reached at incident place</td> <td>Not available</td> </tr> <tr> <td>First aider:</td> <td>Not available</td> </tr> <tr> <td>Mechanical Person— MR. 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Lay out etc.</li> <li>SAC need to be present in ECC during emergency. of Safety gate.</li> <li>One sander parallel to siren need to be provided at Admin building.</li> </ul> <p><b>(F) Observers:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">NAME</th> <th style="width: 50%;">LOCATION OF OBSERVATION</th> </tr> </thead> <tbody> <tr> <td>Mr. Sagar Kadam</td> <td>Incident spot   Work area monitoring</td> </tr> <tr> <td>Mr. Rakesh Dubey</td> <td>Fire fighting operation</td> </tr> <tr> <td>Mr. Parag Soodiya</td> <td>Traffic control</td> </tr> </tbody> </table> <p>Incident Controller: Mr. Avinab Dutta</p> <p>Signature: _____</p> <p>Date: 09.01.2023</p>	Date: 09.01.2023	Time: 08:55 to 09:15 hr	Location of Incident (silo):	Utility block ABL-1	Type of Incident created for Drill:	Ammonia leakage from utility section	Sr. No.	ACTIONS	OBSERVATIONS	1	Local emergency siren activation (09:00 hrs)	<ul style="list-style-type: none"> <li>Operator Mr. Jagan Patel was taking his routine round suddenly block he observed smell of ammonia leakage.</li> <li>Immediately he operated MCP Plant.</li> <li>So he called operator with HCl touch to find leakage source.</li> <li>Plant in charge Mr. Avinab Dutta &amp; safety team rushed the spot after listening siren.</li> <li>Safety team along with Operator and Plant in charge wore BA set to find out possible point of leakage.</li> <li>The area was isolated with barricading tape.</li> <li>Leakage of ammonia gas was found from ammonia charging line.</li> <li>Immediately ammonia gas was stop feeding</li> </ul>	2	Evacuation and area cordoff by IC (Incident Controller)  Traffic controlling  Fire Fighting operation	<ul style="list-style-type: none"> <li>IC (Mr. Avinab Dutta) instructs to ERT member for area cordoned off.</li> <li>On listening the siren, security officer instructed to guard for traffic control at affected area.</li> <li>Safety Officer with Fire officer visited the spot and instructed person to wear BA Set.</li> <li>After consulting with IC, safety officer inform operator to turn off Ammonia supply.</li> <li>Plant in charge gave confirmation for ammonia supply stoppage.</li> </ul>	Emergency team members:		Fire dept. 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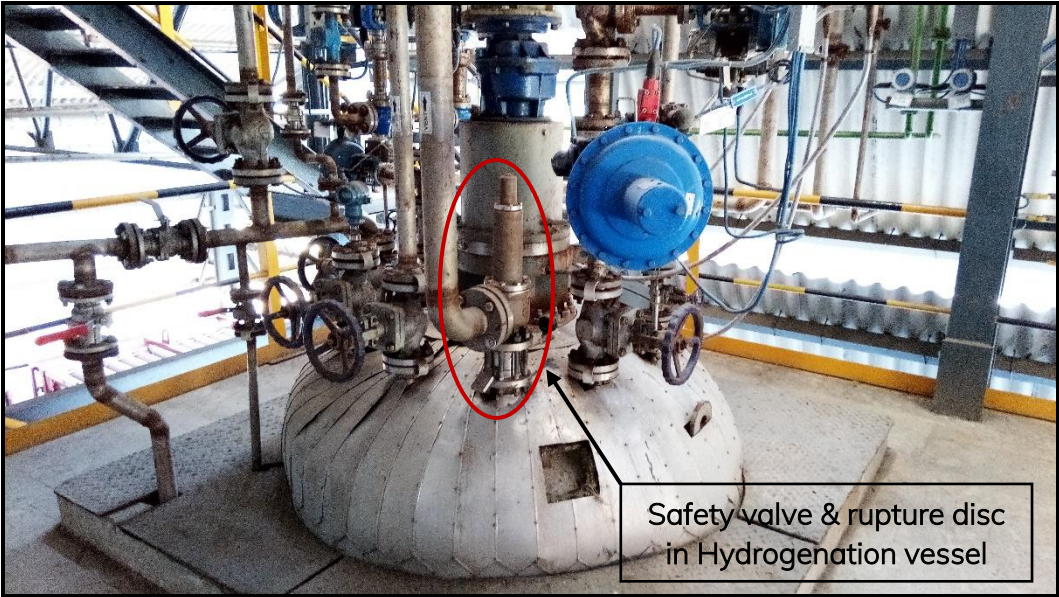


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e)	PP shall obtain PESO permission for the storage and handling of hazardous chemicals. (if applicable)	<p><b>Noted and compliance assured.</b>            PESO permission is already obtained for the storage and handling of class A and class C hazardous chemicals vide <b>license no. P/HQ/GJ/15/41 (P9652), valid up to December 31, 2028.</b> Copy of the same is attached herewith for your ready reference.</p> 
f)	Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.	<p><b>Noted and compliance assured.</b>            Electrical Flame Proof fittings has been provided as per hazardous area classification.</p>
g)	PP shall install adequate fire hydrant system within premises and separate storage of water for the same shall be ensured by PP.	<p><b>Noted and compliance assured.</b>            Unit has adequately provided fire hydrant system with dedicated fire water reservoir of capacity approx. 877 m<sup>3</sup> is provided.</p>
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.	<p><b>Noted and compliance assured.</b>            All materials are stored as per approved compatibility matrix in dedicated warehouse only.</p>



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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.	<b>Noted and Complied</b> through regular safety audits, trainings, mock drills, SOPs, providing appropriate PPE's etc.
j)	Unit shall provide water sprinkler to the ammonia storage cylinder	<b>Not applicable</b> 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.	<b>Noted and compliance assured.</b> Photographs of the safety valve and rupture disc provided to the reaction vessels are attached herewith for your ready reference. 



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l)	Unit shall provide safety valve & rupture disc to the Hydrogenation vessel.	<p><b>Noted and compliance assured.</b> Unit has provided safety valve &amp; rupture disc in all Hydrogenation vessel. Photographs of the same is attached herewith for your ready reference.</p> 
m)	Unit shall provide chlorine leakage control emergency kit and FRP hood with scrubber system for chlorine safety.	<p><b>Not applicable</b> as unit is not storing and handling chlorine presently. However, we have provided appropriate safety system for its use.</p>
n)	Unit shall provide effective isolation for process area and storage of hazardous chemicals.	<p><b>Noted and compliance assured.</b> Unit has already provided <b>separate area</b> for process area and warehouse for storage of hazardous chemicals.</p>
o)	Unit shall provide adequate safety	<p><b>Noted and compliance assured.</b></p>



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	system such as water sprinklers, water curtains, foam pouring system etc. To restrict cascade fire emergency in solvent tank farm.	The unit has already provided underground storage tanks with secondary containment with proper earthing, flame arresters, lightning arresters, fencing, Fire hydrant system, Fire extinguishers, flame proof equipment, etc. safety measures.																										
<b>A. 2 WATER</b>																												
16	Total water requirement for the project shall not exceed 598 KLD. Unit shall reuse 399.20 KLD treated waste water. Hence fresh water shall not exceed 198.80 KLD. It shall be met through from River water (Par River) and from nearby municipal STPs. Prior permission from the concerned authority shall be obtained for withdrawal of water.	<p><b>Noted and compliance assured.</b> The average total fresh water consumption for the report period is 76 m<sup>3</sup>/day only which is well within the limit. Monthly water consumption reports are submitted onto GPCB XGN portal on regular basis. Details given in below table:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Water consumption, m<sup>3</sup></th> </tr> <tr> <th>m<sup>3</sup>/month</th> <th>m<sup>3</sup>/day</th> </tr> </thead> <tbody> <tr> <td>October 2022</td> <td>1359</td> <td>44</td> </tr> <tr> <td>November 2022</td> <td>1980</td> <td>66</td> </tr> <tr> <td>December 2022</td> <td>1421</td> <td>46</td> </tr> <tr> <td>January 2023</td> <td>2195</td> <td>71</td> </tr> <tr> <td>February 2023</td> <td>3459</td> <td>124</td> </tr> <tr> <td>March 2023</td> <td>3366</td> <td>109</td> </tr> <tr> <td>Average</td> <td>2297</td> <td>76</td> </tr> </tbody> </table>	Month	Water consumption, m <sup>3</sup>		m <sup>3</sup> /month	m <sup>3</sup> /day	October 2022	1359	44	November 2022	1980	66	December 2022	1421	46	January 2023	2195	71	February 2023	3459	124	March 2023	3366	109	Average	2297	76
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17	The industrial effluent generation from the project shall not exceed 450.50 KLD after expansion.	<p><b>Noted and compliance assured.</b> The average total industrial effluent generation for the report period is 31 m<sup>3</sup>/day only which is well within the limit. Details given in below table:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Wastewater generation, m<sup>3</sup></th> </tr> <tr> <th>m<sup>3</sup>/month</th> <th>m<sup>3</sup>/day</th> </tr> </thead> <tbody> <tr> <td>October 2022</td> <td>504</td> <td>16</td> </tr> <tr> <td>November 2022</td> <td>776</td> <td>26</td> </tr> </tbody> </table>	Month	Wastewater generation, m <sup>3</sup>		m <sup>3</sup> /month	m <sup>3</sup> /day	October 2022	504	16	November 2022	776	26															
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		February 2023	1158	41																	
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		Average	942	31																	
		<p>The maximum values during the compliance period confirms that at no time the wastewater generation went beyond the stipulated value. Summary is given below:</p>																			
		<table border="1"> <thead> <tr> <th data-bbox="813 667 1140 783">Waste-water generation</th> <th data-bbox="1140 667 1420 783">Stipulated value</th> <th colspan="3" data-bbox="1420 667 2058 746">Values for the period October 2022 – March 2023</th> </tr> <tr> <td data-bbox="813 746 1140 783"></td> <td data-bbox="1140 746 1420 783"></td> <th data-bbox="1420 746 1641 783">Min.</th> <th data-bbox="1641 746 1861 783">Max.</th> <th data-bbox="1861 746 2058 783">Avg.</th> </tr> </thead> <tbody> <tr> <td data-bbox="813 783 1140 863">Wastewater generation, m<sup>3</sup>/day</td> <td data-bbox="1140 783 1420 863">450.5</td> <td data-bbox="1420 783 1641 863">16</td> <td data-bbox="1641 783 1861 863">58</td> <td data-bbox="1861 783 2058 863">31</td> </tr> </tbody> </table>	Waste-water generation	Stipulated value	Values for the period October 2022 – March 2023					Min.	Max.	Avg.	Wastewater generation, m <sup>3</sup> /day	450.5	16	58	31				
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18	<p>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.</p>																				
	<ul style="list-style-type: none"> <li>● <b>High COD and TDS effluent (147 KLD):</b></li> </ul> <p>147 KLD, high COD effluent from process shall be treated in primary ETP followed by solvent stripper and then it shall be evaporated in in-house MEE cum ATFD.137 KLD, MEE condensate shall be further treated in Low COD</p>	<p>Noted and will be complied after commissioning of ZLD system.</p> <p>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 reused. Hence, there is no high COD waste water stream remaining.</p>																			



Sr. No	Condition	Compliance
	Stream ETP.	
	<ul style="list-style-type: none"><li>● <b>Low COD and TDS effluent (303.50 KLD) :</b> &gt; 303.50 KLD, Low COD and TDS effluent from utility along with 137 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.</li></ul>	<p>Noted and will be complied after commissioning of ZLD system.</p> <p>Project work is under process. ZLD work is ongoing. Hence, lean effluent of COD &lt;2000 ppm is being sent to ETP of Atul Ltd for treatment final discharge as per point 4 of EC F. No. J -11011/84/2009-IA II (I) dated April 9, 2009.</p>
19	Domestic waste water generation shall not exceed 10 KL/Day for proposed project and it shall be treated in STP. Treated sewage shall be utilized for gardening and plantation purpose within premises after achieving on-land discharge norms prescribed by the GPCB.	<p><b>Noted and compliance assured.</b></p> <p>Domestic wastewater generated from existing as well as proposed project is being disposed off through a septic tank/ ETP.</p> <p>The average total domestic wastewater generation for the report period is 8 m<sup>3</sup>/day only against consented quantity of 160 KLD (existing 150 + proposed 10), which is well within the limit prescribed in valid CCA order no. GPCB/CCA-VSD-199(3)/ID: 33661/531257, valid up to 30/06/2023.</p>
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	<p>Domestic wastewater is being disposed off through a septic tank/ ETP.</p> <p>Hence, there is no discharge of wastewater outside the premises in any case.</p>



Sr. No	Condition	Compliance
	of waste water outside the premises in any case.	
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.	<b>Noted and will be complied as project is in implementation stage.</b> 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.	<b>Noted and compliance assured</b> 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.  <p data-bbox="931 1185 1135 1217">ETP Inlet (ABL)</p>  <p data-bbox="1525 1185 1753 1217">ETP Outlet (ABL)</p> <p data-bbox="1296 1225 1984 1289">(Treated effluent goes from ABL to Atul Ltd's ETP for final discharge)</p>





Sr. No	Condition	Compliance
		 <p data-bbox="936 778 1099 810">UF-RO Inlet</p>  <p data-bbox="1288 778 1518 810">UF-RO Permeate</p>  <p data-bbox="1727 778 1917 810">UF-RO Reject</p>  <p data-bbox="1402 1331 1464 1361">MEE</p>






Sr. No	Condition	Compliance																																																								
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.	<b>Noted and compliance assured</b> Proper logbooks are maintained for ETP - ABL (quantity and quality) and chemical consumption on daily basis. Separate logbook for RO and MEE will be maintained post commissioning.																																																								
<b>A.3 AIR :</b>																																																										
24	Unit shall not exceed fuel consumption for DG set as mentioned below: <table border="1" data-bbox="257 758 795 941"> <thead> <tr> <th>Sr. no.</th> <th>Source of emission With Capacity</th> <th>Stack Height (meter)</th> <th>Type of Fuel</th> <th>Quantity of Fuel MT/Day</th> <th>Type of emissions i.e. Air Pollutants</th> <th>Air Pollution Control Measures (APCM)</th> </tr> </thead> <tbody> <tr> <td colspan="7"><b>Existing</b></td> </tr> <tr> <td>1</td> <td>Steam from Co-gen CPP of Atul Limited</td> <td>--</td> <td>--</td> <td>--</td> <td>--</td> <td>--</td> </tr> <tr> <td>2</td> <td>DG Set (50 kVA) (Stand by)</td> <td>11</td> <td>HSD</td> <td>12 Lit/Hrs</td> <td>Adequate Stack height</td> <td>PM, SO<sub>2</sub>, NO<sub>x</sub></td> </tr> <tr> <td colspan="7"><b>Proposed</b></td> </tr> <tr> <td colspan="7">No additional Flue gas stack proposed</td> </tr> </tbody> </table>	Sr. no.	Source of emission With Capacity	Stack Height (meter)	Type of Fuel	Quantity of Fuel MT/Day	Type of emissions i.e. Air Pollutants	Air Pollution Control Measures (APCM)	<b>Existing</b>							1	Steam from Co-gen CPP of Atul Limited	--	--	--	--	--	2	DG Set (50 kVA) (Stand by)	11	HSD	12 Lit/Hrs	Adequate Stack height	PM, SO <sub>2</sub> , NO <sub>x</sub>	<b>Proposed</b>							No additional Flue gas stack proposed							<b>Noted and compliance assured.</b> DG sets is being used only as a power backup only. Details of HSD consumption in DG sets given in below table: <table border="1" data-bbox="828 821 1422 1260"> <thead> <tr> <th>Month</th> <th>HSD consumption Litre/month</th> </tr> </thead> <tbody> <tr> <td>October 2022</td> <td>21</td> </tr> <tr> <td>November 2022</td> <td>18</td> </tr> <tr> <td>December 2022</td> <td>18</td> </tr> <tr> <td>January 2023</td> <td>20</td> </tr> <tr> <td>February 2023</td> <td>18</td> </tr> <tr> <td>March 2023</td> <td>23</td> </tr> </tbody> </table>	Month	HSD consumption Litre/month	October 2022	21	November 2022	18	December 2022	18	January 2023	20	February 2023	18	March 2023	23
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25	Unit shall provide adequate APCM with flue gas generation sources as mentioned above.	<b>Not applicable</b> as steam will be supplied by parent company Atul Ltd. Hence, no flue gas stack is installed in the premises. Adequate stack height is provided for stack attached to DG set.																																																								



Sr. No	Condition	Compliance																																								
26	<p>Unit shall provide adequate APCM with Process gas generation sources as mentioned below:</p> <table border="1" data-bbox="264 488 792 651"> <thead> <tr> <th>Sr. no.</th> <th>Specific Source of emission (Name of the Product &amp; Process)</th> <th>Type of emissions i.e. Air Pollutants (SO<sub>2</sub>, HCl, Cl etc.)</th> <th>Stack/Vent Height (meter)</th> <th>Air Pollution Control Measures (APCM)</th> </tr> </thead> <tbody> <tr> <td colspan="5"><b>Existing</b></td> </tr> <tr> <td>1</td> <td>MPP1</td> <td>HCl, SO<sub>2</sub></td> <td>12</td> <td>Water &amp; Alkaline Scrubber</td> </tr> <tr> <td colspan="5"><b>Proposed addition after expansion</b></td> </tr> <tr> <td>2</td> <td>MPP2</td> <td>HCl, SO<sub>2</sub>, NH<sub>3</sub></td> <td>12</td> <td>Water &amp; Alkaline Scrubber</td> </tr> <tr> <td>3</td> <td>MPP3</td> <td>HCl, SO<sub>2</sub>, NH<sub>3</sub></td> <td>12</td> <td>Water &amp; Alkaline Scrubber</td> </tr> <tr> <td>4</td> <td>MPP4</td> <td>HCl, SO<sub>2</sub>, NH<sub>3</sub></td> <td>12</td> <td>Water &amp; Alkaline Scrubber</td> </tr> <tr> <td>5</td> <td>MPP5</td> <td>HCl, SO<sub>2</sub>, NH<sub>3</sub></td> <td>12</td> <td>Water &amp; Alkaline Scrubber</td> </tr> </tbody> </table>	Sr. no.	Specific Source of emission (Name of the Product & Process)	Type of emissions i.e. Air Pollutants (SO <sub>2</sub> , HCl, Cl etc.)	Stack/Vent Height (meter)	Air Pollution Control Measures (APCM)	<b>Existing</b>					1	MPP1	HCl, SO <sub>2</sub>	12	Water & Alkaline Scrubber	<b>Proposed addition after expansion</b>					2	MPP2	HCl, SO <sub>2</sub> , NH <sub>3</sub>	12	Water & Alkaline Scrubber	3	MPP3	HCl, SO <sub>2</sub> , NH <sub>3</sub>	12	Water & Alkaline Scrubber	4	MPP4	HCl, SO <sub>2</sub> , NH <sub>3</sub>	12	Water & Alkaline Scrubber	5	MPP5	HCl, SO <sub>2</sub> , NH <sub>3</sub>	12	Water & Alkaline Scrubber	<p><b>Noted and compliance assured.</b> 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.</p> <div style="display: flex; justify-content: space-around;">   </div>
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27	<p>The fugitive emission in the work zone environment shall be monitored. The emission shall conform to the standards prescribed by the concerned authorities from time to time (e.g. Directors of Industrial Safety &amp; Health). Following indicative guidelines shall</p>	<p><b>Noted and compliance assured.</b> Work Zone Environment Monitoring is carried out and record maintain in Form No. 37. Summary of results of VOC monitoring is given in below table:</p>																																								



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	also be followed to reduce the fugitive emission.	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th colspan="6" style="text-align: center;">Ground Floor MPP2</th> </tr> <tr> <th rowspan="2" style="text-align: center;">Parameter</th> <th rowspan="2" style="text-align: center;">Permissible limit mg / Nm<sup>3</sup></th> <th colspan="6" style="text-align: center;">Values for the period</th> </tr> <tr> <th style="text-align: center;">Oct-22</th> <th style="text-align: center;">Nov-22</th> <th style="text-align: center;">Dec-22</th> <th style="text-align: center;">Jan-23</th> <th style="text-align: center;">Feb-23</th> <th style="text-align: center;">Mar-23</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Chlorine</td> <td style="text-align: center;">3</td> <td style="text-align: center;">ND</td> <td style="text-align: center;">ND</td> <td style="text-align: center;">ND</td> <td style="text-align: center;">ND</td> <td style="text-align: center;">ND</td> <td style="text-align: center;">ND</td> </tr> <tr> <td style="text-align: center;">Toluene</td> <td style="text-align: center;">150</td> <td style="text-align: center;">110</td> <td style="text-align: center;">92</td> <td style="text-align: center;">90</td> <td style="text-align: center;">104</td> <td style="text-align: center;">95</td> <td style="text-align: center;">96</td> </tr> </tbody> </table>			Ground Floor MPP2						Parameter	Permissible limit mg / Nm <sup>3</sup>	Values for the period						Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Chlorine	3	ND	ND	ND	ND	ND	ND	Toluene	150	110	92	90	104	95	96
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	<p>➤ Internal roads shall be either concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement.</p>	<p>All Internal roads are asphalted or paved properly and daily it is cleaned. Entire site is either asphalted or paved area or green area. Photograph is attached herewith for your ready reference.</p> <div style="text-align: center;">  </div>																																						
	<p>➤ Air borne dust shall be controlled with water sprinklers at suitable locations in the plant.</p>	<p>We are doing regular cleaning with dry booming as already low dust zone.</p>																																						



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.	<b>Noted and compliance assured.</b> 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	<b>Noted and compliance assured.</b> 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	<b>Noted and compliance assured.</b> Photographs of the reflux condenser provided over reactors/vessels are attached herewith for your ready reference.






Sr. No	Condition	Compliance
		
c.	Pumps shall be provided with mechanical seals to prevent leakages	<p data-bbox="824 751 2047 858"><b>Noted and compliance assured.</b> Reactor and solvent handling pump do have <b>mechanical seals</b> to prevent leakages. Photographs of the same are attached herewith for your ready reference.</p> <div data-bbox="981 895 1272 1334"></div> <p data-bbox="1070 1337 1182 1366">Reactor</p> <div data-bbox="1447 895 2213 1334"></div> <p data-bbox="1576 1337 1890 1366">Solvent handling pump</p>



Sr. No	Condition	Compliance
d.	Air borne dust at all transfers operations points shall be controlled either by spraying water or providing enclosures	No such aspect (air borne dusty operation) is there in our plant. All the processes are being carried out in closed vessels only.
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.	<b>Noted and compliance assured.</b> 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	<b>Noted and compliance assured.</b> Reactors are connected to chilled brine condenser system.
	Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	<b>Noted and compliance assured.</b> Reactor and solvent handling pump do have <b>mechanical seals</b> 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.	<b>Noted and compliance assured.</b> 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	<b>Complied.</b> The unit has already provided underground storage tanks with secondary containment to



Sr. No	Condition	Compliance
	measures.	<p>restrict fire emergency in solvent tank farms. Photographs of the same are attached herewith for your ready reference.</p> 
	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	<p><b>Noted and compliance assured.</b> Double earthing is provided and regular checking and testing of the same is being done and recorded.</p>
	Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	<p><b>Noted and compliance assured.</b> 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.</p>
31	Regular monitoring of level concentration of PM10, PM2.5, SO2, NOX, HC, NH3 and VOC shall be carried out in the impact zone and its records shall be maintained. Ambient	<p><b>Noted and compliance assured.</b> We are regularly doing ambient air monitoring through NABL approved agency at 02 locations at a time. We have provided ambient air monitoring stations in line with guidelines of CPCB/GPCB.</p>



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	<p>air quality levels shall not exceed the standards stipulated by the GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be taken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.</p>	<p>Summary of ambient monitoring is given in below table:</p> <table border="1" data-bbox="824 392 2042 874"> <thead> <tr> <th colspan="9" data-bbox="824 392 2042 432">Near MPP 2 Plant</th> </tr> <tr> <th data-bbox="824 432 880 544">Sr..... 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No.	Pollutant	Concentration in Ambient air in ug/M <sup>3</sup>									GPCB limits	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	1.	Sulphur Dioxide (SO <sub>2</sub> )	80	41.7	53.4	57.2	55.8	57.8	40.9	2.	Nitrogen Dioxide (NO <sub>2</sub> )	80	92.6	96.8	94.3	92.1	94.2	76.3	3.	Particulate Matter (Size less than 10 um) OR PM <sub>10</sub>	100	11.7	8.4	13.1	11.4	10.8	11.2	4.	Particulate Matter (Size less than 2.5 um) OR PM <sub>2.5</sub>	60	21.3	22.6	26.9	23.6	18.4	20.6	Near MPP 1 Plant									Sr No.	Pollutant	Concentration in Ambient air in ug/M <sup>3</sup>									GPCB limits	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	1.	Sulphur Dioxide (SO <sub>2</sub> )	80	51.2	47.8	54.1	53.6	49.8	52.4	2.	Nitrogen Dioxide (NO <sub>2</sub> )	80	90.4	81.6	87.6	90.4	87.3	89.6	3.	Particulate Matter (Size less than 10 um) OR PM <sub>10</sub>	100	13.2	10.6	15.8	13.2	16.1	13.8	4.	Particulate Matter (Size less than 2.5 um) OR PM <sub>2.5</sub>	60	26.9	24.1	27.9	24.8	28.7	24.9
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Sr. No	Condition	Compliance
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**A. 4 SOLID/HAZARDOUS WASTE**

32 All the hazardous waste management shall be taken care as mentioned below:

**Noted and will be complied.**  
 For EC project, we will amend our authorization as soon as project is commissioned. Unit is taking care of hazardous waste generated in the premises as per valid CCA order no. GPCB/CCA-VSD-199(3)/ID: 33661/531257, valid up to 30/06/2023.

Sr. No.	Type/ Name of Hazardous waste	Specific Source of generation (Name of the Activity, Product etc.)	Category No. as per HWM rules, 2016	Quantity			Method of Disposal
				Existing	Proposed	Total	
1.	ETP Waste	ETP	35.3	0.0*	1200 MT/Annum	1200 MT/Annum	Collection, storage & disposal at TSDF site approved by GPCB.
2.	MEE Salt	MEE	35.3	0.0**	8767 MT/Annum	11326 MT/Annum	Collection, storage & disposal at CHWIF or co-processing
3.	Distillation residue-Process	Process	28.1	20.64 MT/Annum	4002.36 MT/Annum	4023 MT/Annum	Collection, storage & disposal at CHWIF or co-processing
4.	Distillation residue-Stripper	Process	28.1	0.0***	624 MT/Annum	624 MT/Annum	Collection, storage & disposal at TSDF site approved by GPCB.
5.	Inorganic salt	Process	28.1	0.0	1144 MT/Annum	1144 MT/Annum	Collection, storage & disposal at CHWIF or co-processing
6.	Used activated carbon	Process	28.3	0.0	78 MT/Annum	78 MT/Annum	Collection, storage & disposal at CHWIF or co-processing
7.	Spent catalyst	Process	28.2	0.0	30 MT/Annum	30 MT/Annum	Collection, storage & return back to supplier for regeneration.
8.	Spent solvent	Process	28.6	---	65264 MT/Annum	65264 MT/Annum	Collection, storage, Distillation and reuse in process/selling to actual user.
9.	Discarded containers/ barrels/ Liners	Storage & handling of Raw Materials	33.1	6000 Nos./Annum	18000 Nos./Annum	2400 Nos./Annum	Collection, storage and reuse for packing of products or disposal by selling to approved recycler.
10.	Off Specific Products	--	28.4	Whatsoever generation			Collection, storage & disposal at CHWIF.
11.	Date expired product	--	28.5	Whatsoever generation			Collection, storage & disposal at CHWIF.
12.	Used Lubricating Oil	D/G Sets & other machineries	5.1	0.5 KL/Annum	0.5 KL/Annum	0.5 KL/Annum	Collection, storage & use within premises as lubricant/sell to registered recycler.
13.	Scrubber Blow Down	Scrubber	--	780 KL/Annum	3120 KL/Annum	3900 KL/Annum	Collection, storage and treated in ETP
14.	Aluminum	Process of 4	--	--	402	402	Collection, storage,

S No.	Hazardous waste	Cat.	Consented Generation Qty	Actual Generation Qty	Mode of Disposal
1	Process waste	28.1	20.64 MT/Year	6.47 MT (Oct -22 to Mar -23)	Incineration at incineration system of Atul Ltd
2	Discarded Containers/ Bags/ Liners	33.1	26.4 MT/Year	12.36 MT (Oct -22 to Mar -23)	Selling to authorized recycler
3	HCl (30%)	B15	153 MT/Month	--	Selling to unit who have obtained rule 9 permission.

15.	Hydroxide	MAP, 4 MEP	--	--	209.6	209.6	transportation and disposal by selling to actual users under Rule-9 of Haz. waste
16.	Zinc Carbonate	Process of 5 HMT	--	--	91.2	91.2	
17.	Calcium Phosphate	Process of N-Methyl-12-(Propane-2YL)-1,3,4-Thiazole-4-YL Methanamine	--	--	456	456	
18.	Benzyl Alcohol	Process of (2S,3S,5S)-2-Amino-3-Hydroxy-5-(Tert-Butyloxy Carbonyl) Amino-1,6-Diphenyl Hexyl Succinic Acid Salt	--	--	37.5	37.5	
18	4-Nitro Phenol	Process of 4 NPTC	--	--	37.5	37.5	

\* Existing effluent treated at Central Side ETP with other industrial effluent generated by other units of Atul Complex. Hence ETP sludge not consider in CC&A of Atul Bioscience Limited.

\*\* There is no MEE for existing set up and after expansion, total high COD/TDS effluent going to MEE after stripper hence expansion quantity and total quantity of Salt is differ.

\*\*\* There is no stripper for existing set up and after expansion, total high COD effluent going to stripper hence expansion quantity and total quantity of Residue is differ.



Sr. No	Condition	Compliance
33	Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other wastes (Management and Trans boundary Movement) Rules 2016.	<b>Noted and compliance assured.</b> Presently, we are not generating any waste that needs to be disposed off under the Rule 9 of the Hazardous and Other wastes (Management and Trans boundary Movement) Rules 2016 according to valid consent order no. GPCB/CCA-VSD-199(3)/ID: 33661/531257, valid up to 30/06/2023.
34	Unit shall explore the possibilities for environment friendly methods like co-processing of hazardous waste for disposal of Incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.	<b>Noted.</b>
<b>A. 5 OTHER :</b>		
35	The project proponent shall allocate the separate fund of Rs. 76.50 Lakhs as committed before SEAC. The entire activities proposed under CER shall be part of the Environment Management Plan (EMP) as per the MoEF& CC's OM no. F. No. 22-65/2017-IA III dated 30.09.2020. This shall be monitored and the monitoring report shall be submitted to the regional office of MoEF&CC as a part of half-yearly	Noted and will be complied. Please note that the project is in implementation stage. We assure you to carry out CER activities as committed.



Sr. No	Condition	Compliance
	compliance report and to the District Collector. The monitoring report shall be posted on the website of the project proponent.	
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.	<b>Noted and compliance assured.</b> 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>B. GENERAL CONDITIONS :</b>		
<b>B1. CONSTRUCTION PHASE :</b>		
37	Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> Regular water sprinkling is being done near construction site to controlling fugitive emission of dust.



Sr. No	Condition	Compliance
39	All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the construction phase.	<b>Noted and compliance assured.</b> Adequate sanitary and hygienic measures has been provided at the site and will be maintained throughout the construction phase as below: <ul style="list-style-type: none"><li>• Clean up of jobsite after major tasks or at least daily;</li><li>• Avoiding the build-up of hazardous, flammable, or combustible materials.</li><li>• Keeping walkways, stairs, and work areas clear.</li><li>• 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).</li></ul>
40	First Aid Box shall be made readily available in adequate quantity at all the times.	<b>Noted and compliance assured.</b> First Aid boxes have been provided in adequate quantity.
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.	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	<b>Noted and compliance assured.</b> We are regularly doing noise monitoring through NABL approved agency. Summary of noise monitoring is given in below table:



Sr. No	Condition	Compliance																													
	and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.	<table border="1"> <thead> <tr> <th data-bbox="822 376 900 451">Sr. No.</th> <th data-bbox="900 376 1111 451">Date of Monitoring</th> <th data-bbox="1111 376 1270 451">Test Parameter</th> <th data-bbox="1270 376 1375 451">Unit</th> <th data-bbox="1375 376 1637 451">Sampling location</th> <th data-bbox="1637 376 1789 451">Results</th> <th data-bbox="1789 376 2049 451">Permissible limits</th> </tr> </thead> <tbody> <tr> <td data-bbox="822 451 900 496">1</td> <td data-bbox="900 451 1111 496">11/10/2022</td> <td data-bbox="1111 451 1270 708" rowspan="6">Nosie</td> <td data-bbox="1270 451 1375 708" rowspan="6">dB (A)</td> <td data-bbox="1375 451 1637 708" rowspan="6">Utility Near Compressor</td> <td data-bbox="1637 451 1789 496">77.2</td> <td data-bbox="1789 451 2049 708" rowspan="6">85</td> </tr> <tr> <td data-bbox="822 496 900 541">2</td> <td data-bbox="900 496 1111 541">16/11/2022</td> <td data-bbox="1637 496 1789 541">76.5</td> </tr> <tr> <td data-bbox="822 541 900 585">3</td> <td data-bbox="900 541 1111 585">09/12/2022</td> <td data-bbox="1637 541 1789 585">77.8</td> </tr> <tr> <td data-bbox="822 585 900 630">4</td> <td data-bbox="900 585 1111 630">10/01/2023</td> <td data-bbox="1637 585 1789 630">78.4</td> </tr> <tr> <td data-bbox="822 630 900 675">5</td> <td data-bbox="900 630 1111 675">08/02/2023</td> <td data-bbox="1637 630 1789 675">79.3</td> </tr> <tr> <td data-bbox="822 675 900 708">6</td> <td data-bbox="900 675 1111 708">09/03/2023</td> <td data-bbox="1637 675 1789 708">78.4</td> </tr> </tbody> </table>	Sr. No.	Date of Monitoring	Test Parameter	Unit	Sampling location	Results	Permissible limits	1	11/10/2022	Nosie	dB (A)	Utility Near Compressor	77.2	85	2	16/11/2022	76.5	3	09/12/2022	77.8	4	10/01/2023	78.4	5	08/02/2023	79.3	6	09/03/2023	78.4
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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.	<p><b>Noted and compliance assured.</b>            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.</p>																													
44	Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.	<p><b>Noted and compliance assured.</b>            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.</p>																													
45	All topsoil excavated during construction activity shall be used in horticultural landscape development within the project site.	<p><b>Noted and compliance assured.</b>            All the top soil excavated during construction work is utilized in horticulture/ landscape development within the premises.</p>																													





Sr. No	Condition	Compliance
46	Excavated earth to be generated during the construction phase shall be utilized within the premises to the maximum 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.	<b>Noted and compliance assured.</b> All the top soil excavated during construction work is utilized in horticulture/ landscape development within the premises.
47	Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, Ready Mix Concrete [RMC] and lead free paints in the project.	<b>Noted and compliance assured.</b> Fly Ash bricks is being used along with Ready Mix Concrete [RMC] and fly ash paver blocks for the construction.
48	Fly ash shall be used in construction wherever applicable as per provisions of Fly Ash Notification under the E.P. Act, 1986 and its subsequent amendments from time to time.	We shall explore feasibility for usage of fly ash in construction activities, shall ensure compliance of notification under E.P. Act, 1986 and its subsequent amendments from time to time.
49	"Wind - breaker of appropriate height i.e. 1/3rd of the building height and	<b>Noted and complied.</b> Temporary wind shielding had been provided and barricades of adequate height also had



Sr. No	Condition	Compliance
	maximum up to 10 meters shall be 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."	<b>Noted and is being ensured</b> 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."	<b>Noted and is being ensured.</b>
52	Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads).	<b>Noted and ensured.</b>
53	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	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	<b>Noted for compliance.</b>



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




Sr. No	Condition	Compliance
	shall continuously strive to reduce, recycle and reuse the treated effluent.	
<b>B.2.2 AIR :</b>		
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.	<b>Noted and compliance assured.</b> 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	<b>Noted and compliance assured.</b> Adequate height of stack provided as per prevailing norms.



Sr. No	Condition	Compliance																																											
	per the prevailing norms for flue gas emission/Process gas emission.																																												
63	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.	<p><b>Noted and compliance assured.</b> There is no flue gas emission. Two Stage Water + Caustic Scrubber are provided to control emissions. We are regularly doing process gas emission through MoEF&amp;CC &amp; NABL approved agency. Summary of process gas is given in below table:</p> <table border="1"> <thead> <tr> <th colspan="9">Near MPP 1 Plant</th> </tr> <tr> <th rowspan="2">S No.</th> <th rowspan="2">Pollutant</th> <th colspan="7">Concentration in Ambient air in ug/M<sup>3</sup></th> </tr> <tr> <th>GPCB limits</th> <th>Oct-22</th> <th>Nov-22</th> <th>Dec-22</th> <th>Jan-23</th> <th>Feb-23</th> <th>Mar-23</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Chlorine (Cl<sub>2</sub>)</td> <td>09</td> <td>6.5</td> <td>8.8</td> <td>6.2</td> <td>5.5</td> <td>4.12</td> <td>4.9</td> </tr> <tr> <td>2.</td> <td>Hydrochloric acid (HCl)</td> <td>20</td> <td>7.9</td> <td>10.7</td> <td>6.37</td> <td>5.65</td> <td>4.23</td> <td>5.03</td> </tr> </tbody> </table>	Near MPP 1 Plant									S No.	Pollutant	Concentration in Ambient air in ug/M <sup>3</sup>							GPCB limits	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	1.	Chlorine (Cl <sub>2</sub> )	09	6.5	8.8	6.2	5.5	4.12	4.9	2.	Hydrochloric acid (HCl)	20	7.9	10.7	6.37	5.65	4.23	5.03
Near MPP 1 Plant																																													
S No.	Pollutant	Concentration in Ambient air in ug/M <sup>3</sup>																																											
		GPCB limits	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23																																					
1.	Chlorine (Cl <sub>2</sub> )	09	6.5	8.8	6.2	5.5	4.12	4.9																																					
2.	Hydrochloric acid (HCl)	20	7.9	10.7	6.37	5.65	4.23	5.03																																					
64	All the reactors/vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	<p><b>Noted and compliance assured.</b> 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.</p>																																											
<b>B.2.3 HAZARDOUS/SOLID WASTE:</b>																																													
65	The company shall strictly comply with the rules and regulations with regards to handling and disposal of Hazardous	<p><b>Noted and compliance assured.</b> We have taken authorization of GPCB for collection / treatment /storage/ disposal of hazardous wastes vide consent order no. AWH – 96346, valid up to 30/06/2023. We are</p>																																											





Sr. No	Condition	Compliance	
	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 obtained for collection / treatment /storage/ disposal of hazardous wastes.	complying 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.  For EC project, we will amend our authorization as soon as project is commissioned.	
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.	<b>Noted and compliance assured.</b> 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.	
67	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable)	<b>Noted and complied.</b> 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	<b>Noted and compliance assured.</b> We have agreement with authorized vendors which complies with the provisions under	



Sr. No	Condition	Compliance
	accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.	the Motor Vehicle Act, 1988, and rules made there under for transportation of Hazardous Waste.
69	The design of the Trucks/tankers shall be such that there is no spillage during transportation	<b>Noted and being ensured.</b>
70	All possible efforts shall be made for Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF	<b>Noted.</b>
71	Management of fly ash (If any) shall be 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.	It may be please noted that there is no fly ash generation from unit.
<b>B.2.4 SAFETY</b>		
72	The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963.	We are complying with the stated condition and submitting required compliance to DISH.




Sr. No	Condition	Compliance
73	The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules (MSIHC) 1989, as amended time to time and the Public Liability Insurance Act for 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.	<b>Complied.</b> Following measures are taken.... <ul style="list-style-type: none"><li>• MSDS for all chemicals.</li><li>• <b>Licenses for petroleum product, gas cylinders, poison/toxic chemical.</b></li><li>• Plan approval from DISH.</li><li>• Factory license from DISH.</li><li>• A mutual aid agreement with neighboring parent company Atul Ltd to render all emergency services.</li><li>• On site emergency plan and offsite mutual aid. Etc.</li></ul>
74	Main entry and exit shall be separate and clearly marked in the facility	<b>Noted.</b> 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.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> Dedicated storage facility of flammable chemicals provided at safer distance from production area as per PESO approval.



Sr. No	Condition	Compliance
77	Sufficient number of fire extinguishers shall be provided near the plant and storage area.	<b>Noted and compliance assured.</b> We have provided approx. 100 Nos of fire extinguishers (Foam type, CO <sub>2</sub> type, ABC type) across the site to cover all area.
78	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals.	<b>Noted and compliance assured.</b> 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.
79	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	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> 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	<b>Noted and compliance assured.</b> 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



Sr. No	Condition	Compliance
	instead of one single large capacity tank / containers.	quantity.
83	All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals.	<p><b>Noted and compliance assured.</b> A dyke is provided to contained spill to all the existing storage tanks. Mechanical seals are installed on existing pumps, mixers, and reactors.</p> 
84	Handling and charging of the chemicals shall be done in closed manner by	<p><b>Noted and compliance assured.</b> 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</p>





Sr. No	Condition	Compliance
	pumping or by vacuum transfer so that minimal human exposure occurs	water, Chilled water or brine water supply for control of fugitive emission.
85	Tie up shall be done with nearby health care unit/ doctor for seeking immediate medical attention in the case of emergency.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> 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.: <ul style="list-style-type: none"><li>➤ Emergency siren testing</li><li>➤ Work place safety</li><li>➤ SCBA donning procedure</li><li>➤ Process safety</li></ul>



Sr. No	Condition	Compliance
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 per the Factories Act & Rules.	<b>Noted and compliance assured.</b> 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.
90	Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.	<b>Noted and compliance assured.</b>
91	The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report.	<b>Noted and compliance assured.</b> Risk assessment & mitigation is a part of plant design.
92	Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.	<b>Noted and compliance assured.</b> We have obtained necessary permission from various statutory authorities as applicable.
<b>B.2.5 NOISE:</b>		
93	The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures including engineering	<b>Noted and compliance assured.</b> We are regularly doing noise monitoring through NABL approved agency. Summary of noise monitoring is given in below table:



Sr. No	Condition	Compliance						
		Sr. No.	Date of Monitoring	Test Parameter	Unit	Sampling location	Results	Permissible limits
	controls like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall confirm to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.	1	11/10/2022	Nosie	dB (A)	Utility Near Compressor	77.2	85
2		16/11/2022	76.5					
3		09/12/2022	77.8					
4		10/01/2023	78.4					
5		08/02/2023	79.3					
6		09/03/2023	78.4					
<b>B.2.6 CLEANER PRODUCTION AND WASTE MINIMISATION:</b>								
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.	<p><b>Noted and compliance assured.</b>            We have state of art R&amp;D centre with latest research facility. A qualified team is continuously working on such concept. Drug is developed with such basic philosophy as below:</p> <ul style="list-style-type: none"> <li>• Optimisation of use of water in place of solvent in manufacturing activity.</li> <li>• Replacement of hazardous raw material with less hazardous raw material.</li> <li>• Avoid use of toxic material.</li> <li>• Optimisation of exothermic reaction. Control on material mass balance with maximum reaction conversion. This will improve yield.</li> </ul>						
95	The company shall undertake various waste minimization measures such as:	<p><b>Noted and compliance assured.</b></p> <ul style="list-style-type: none"> <li>• 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 charged after proper weighment only. All these meters and weighing machines are calibrated and records are maintained.</li> </ul>						
a.	Metering and control of quantities of active ingredients to minimize waste.							



Sr. No	Condition	Compliance
b.	Reuse of by-products from the process as raw materials or as raw materials substitutes.	<ul style="list-style-type: none"><li>Recovered solvents are being used as raw material in further steps.</li><li>Filling is done on weighing balance manually but in controlled manner to minimize spillage.</li><li>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.</li><li>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.</li><li>Many equipment like reactors, spray dryers, condenser wherever necessary are being cleaned with high pressure sparger / jet to reduce waste water generation.</li><li>Preventive Maintenance of Equipment's is being carried out as per Standard Operating Procedure.</li></ul>
c.	Use of automated and close filling to minimize spillages	
d.	Use of close feed system into batch reactors.	
e.	Venting equipment through vapour recovery system.	
f.	Use of high pressure hoses for cleaning to reduce wastewater generation.	
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>B.2.7 GREEN BELT AND OTHER PLANTATION :</b>		



Sr. No	Condition	Compliance
96	The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on road sides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC/ GPCB and submit an action plan of plantation for next three years to the GPCB.	<b>Noted and compliance assured.</b> 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 of existing greenbelt are attached in point no. 13.
97	Drip Irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.	<b>Noted and compliance assured.</b> We are using low-volume, low-angle sprinkler system for the green belt development within the premises.
<b>B.3 OTHER CONDITION :</b>		
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).	<b>Noted and compliance assured.</b>
99	The provisions of the Solid Waste	<b>Noted and being ensured.</b>





Sr. No	Condition	Compliance
	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.	
100	Rain water harvesting (Off-site) shall be undertaken to conserve fresh water as well as to recharge ground water. 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).	<b>Not applicable</b> as unit is not consuming ground water.
101	The unit shall join and participate 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.	<b>Noted.</b>



Sr. No	Condition	Compliance
102	Application of solar energy shall be 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.	<b>Noted and will be complied.</b>
103	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.	<b>Noted and compliance assured.</b> Dedicated green belt area is embarked for plantation.
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.	<b>Noted.</b> 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.	<b>Noted.</b> 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	<b>Noted.</b> Unit has provided the system to close down the operation in the event of failure of any



Sr. No	Condition	Compliance
	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.	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 authority.	<b>Noted and being ensured.</b> 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.
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.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> 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.	<b>Noted and compliance assured.</b> Unit is using only mechanical seal pumps in order to avoid the leakages.



Sr. No	Condition	Compliance
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.	<b>Noted.</b> 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-alia under the provisions of the Water (Prevention & Control of Pollution Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	<b>Noted and compliance assured.</b> We have taken all the necessary permissions under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Trans boundary Movement) Rules, 2008 vide <b>consent order no. . GPCB/CCA-VSD-199(3)/ID: 33661/531257, valid up to 30/06/2023</b> and <b>PLI policy vide UIN number - IRDAN190P0076100001, valid up to 31/03/2023 11:59:59 PM</b> under the 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.	<b>Agreed and Noted.</b>
114	The project management shall ensure that unit complies with all the	<b>Noted and compliance assured.</b> Unit complies with all the environment protection measures, risk mitigation measures and



Sr. No	Condition	Compliance															
	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.	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 implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	<p><b>Noted and compliance assured.</b> Adequate funds are allocated for compliance of all conditions and OPEX are also provided to sustain compliance level on continuous basis.</p> <p>A separate budget is being allocated every year to comply with all the legal requirement stipulated by SPCB, CPCB and MoEF&amp;CC apart from upkeep of pollution control systems and facilities. Total expenditure for the report period is given in below table:</p> <table border="1" data-bbox="824 855 2011 1182"> <thead> <tr> <th data-bbox="824 855 1256 911">Period</th> <th data-bbox="1256 855 1581 911">Particular</th> <th data-bbox="1581 855 2011 911">Expenses Rs.in lakh</th> </tr> </thead> <tbody> <tr> <td data-bbox="824 911 1256 1126" rowspan="4">October 2022 – March 2023</td> <td data-bbox="1256 911 1581 967">Effluent treatment</td> <td data-bbox="1581 911 2011 967">60.12</td> </tr> <tr> <td data-bbox="1256 967 1581 1023">EMS Monitoring</td> <td data-bbox="1581 967 2011 1023">0.36</td> </tr> <tr> <td data-bbox="1256 1023 1581 1078">Horticulture</td> <td data-bbox="1581 1023 2011 1078">0.80</td> </tr> <tr> <td data-bbox="1256 1078 1581 1126">Miscellaneous</td> <td data-bbox="1581 1078 2011 1126">0.38</td> </tr> <tr> <td data-bbox="824 1126 1256 1182"></td> <td data-bbox="1256 1126 1581 1182"></td> <td data-bbox="1581 1126 2011 1182"><b>61.66</b></td> </tr> </tbody> </table>	Period	Particular	Expenses Rs.in lakh	October 2022 – March 2023	Effluent treatment	60.12	EMS Monitoring	0.36	Horticulture	0.80	Miscellaneous	0.38			<b>61.66</b>
Period	Particular	Expenses Rs.in lakh															
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	Miscellaneous	0.38															
		<b>61.66</b>															
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	<p><b>Noted and compliance assured</b> Unit has informed public by publishing advertisement about the grant of EC in following two leading newspapers. Copy of the same was submitted to local Government authorities [i.e. Atul gram panchayat, DIC (Valsad), and Jilla parishad (Valsad)] on July 5, 2021, and to regional office of MoEF&amp;CC</p>															





Sr. No	Condition	Compliance
	<p>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.</p>	<p>on July 27, 2021.</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="922 402 1294 933"> </div> <div data-bbox="1444 402 2016 933"> </div> </div> <p style="text-align: center;">Local   vernacular language : "Sandesh" dated July 06, 2021</p> <p style="text-align: center;">English language : "Times of India" dated July 06, 2021</p>
117	<p>It shall be mandatory for the project management to submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1<sup>st</sup> June and 1<sup>st</sup> December of each calendar year.</p>	<p><b>Noted and Complied.</b></p> <p>We are regularly submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions through E-mail as well as in hard copy to the concerned regulatory authority, on or before 1<sup>st</sup> June and 1<sup>st</sup> December of each calendar year.</p>



Sr. No	Condition	Compliance
118	Concealing factual data or submission of false/fabricated data and failure to 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.	<b>Agreed and Noted.</b>
119	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	<b>Noted.</b> 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.	<b>Noted and Agreed.</b>
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.	<b>Noted and compliance assured</b> Company is implementing these conditions in a time bound manner.



Sr. No	Condition	Compliance
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.	<b>Noted and compliance assured</b>
123	This environmental clearance is valid for seven years from the date of issue.	<b>Noted and Agreed.</b>
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.	<b>Noted and Agreed.</b>
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.	<b>Noted and Agreed.</b>

# EC Conditions Six Monthly Compliance Report

(by Project Proponent)



**Proposal No :** . J -11011/84/2009-IA II (I).

## 1. Name of the Entity / Corporate Office :

## 2. Proponent Details :

Proponent Name :	Prashant	Designation :	General Manager Production
Telephone No :	-	Mobile No :	+91 9723551316
Fax No :	-	Email Address :	prashant_kakad@atul.co.in
Website :		Pin Code :	396020
State :	Gujarat	District :	Valsad
Village/Town :			

## 3. Compliance Letter/Report (Proponent):


## 4. Summary Status of Compliance :



Total Condition :	93		
Complied :	90	Being Complied :	3
Not Complied :	0	Partially Complied :	0
Agreed to Comply :	0		

## 5. Details of Production and Project Area :



## 6. Specific Conditions (Proponent):

S.No	Condition	Self Declaration	Remarks / Reason	Supporting Documents	Observation of IRO
1	Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per the Factories Act	Complied	Occupational health surveillance of the workers being carried out on regular basis.	N/A	



2	Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys, etc. An area of 33% green belt and selection of plant species shall be as per the guideline of CPCB.	Complied	Hazardous chemicals are being stored in tanks, drums and carboys considering the storage quantity and chemical stored. Company is having green belt in 33% area of plant and doing plantation every year	N/A	
3	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 All Transportation of Hazardous Chemicals shall be as per the MVA. 1989.	Complied	We are complying with MSIH rule 1989 as amended and having proper storage and handling system, Onsite emergency plan, Licenses, reporting, etc All Transportation of Hazardous Chemicals is as per MVA	N/A	
4	The Company shall harvest surface as well as rainwater from the rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Complied	We have installed 120 KL underground tank and 2 nos 30 KL overhead tank to collect rain water from roof tops.	N/A	
5	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.	N/A	
6	The industrial effluent generation shall not exceed 326.8 m <sup>3</sup> /d. (Total process effluent generation after expansion will be 588.6 m <sup>3</sup> /d-	Complied	Effluent quantity, treatment and result uploaded		




	<p>ref. point 4 of EC) Out of 326.8 m<sup>3</sup>/d, 24 m<sup>3</sup>/d of high COD effluent shall be incinerated in the incinerator (of Atul Ltd as stated in point 4 of EC)</p> <p>Remaining 302.8 m<sup>3</sup>/d of normal effluent stream after mixing with other effluent like cooling tower (111.8 m<sup>3</sup>/d) shall be treated in ETP for primary and secondary treatment. The treated effluent after confirming</p>				
7	<p>The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and the State Pollution Control Board. The criteria pollutant levels namely: SPM, RSPM, SO<sub>2</sub>, NO<sub>x</sub> (ambient levels as well as stack emissions) or critical sectorial parameters like VOC indicated for the p</p>	Complied	<p>The compliance of stipulated EC conditions including results of monitored data is posted on our web site <a href="http://www.atulbio.co.in">www.atulbio.co.in</a>. Compliance report submitted regularly. Stack, ambient and VOC data uploaded</p>		
8	<p>The company shall undertake following Waste Minimization measures :- Metering and control of quantities of active ingredients to minimize waste. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. Use of automated filling to minimize spillage. Use of "Close Feed" system into batch reactors. Venting equipment through vapor recovery system. Use of high pressure hoses for equipment clearing to reduce wastewater generation.</p>	Complied	Details uploaded		
9	<p>The Company shall obtain Authorization for collection,</p>	Complied	We have obtained authorization	N/A	






	<p>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. The concerned company shall undertake measures for firefighting facilities in case of emergency.</p>		<p>through our CCA No. AWH 59131. We have well established fire hydrant network. Mutual aid with parent company Atul Ltd. on-site emergency plan is there. Mockdrills done</p>		
10	<p>The project authorities shall provide the chilled brine solution in secondary condenser for condensation of the VOCs. The project authority shall ensure that the solvent recovery shall not be less than 95%. The VOC monitoring shall be carried in the solvent storage area and data submitted to the Ministry.</p>	Complied	<p>Chilled brine solution is provided in secondary condenser for condensation of the VOCs. Solvent recovery is &gt;95%. VOC monitoring done on regular bases and the results uploaded</p>		
11	<p>Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.</p>	Complied	<p>Fugitive emissions is being regularly monitored by GPCB approved third party. The emission is always being confirmed to the limits.</p>	N/A	
12	<p>Solvent management shall be as follows : Reactor shall be connected to chilled brine condenser system Reactor and solvent handling pump shall 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. Solvents shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. Entire plant s</p>	Complied	<p>Details uploaded</p>		

13	Process emissions in the form of HCl shall be scrubbed with water and caustic scrubber and HCl recovered as by product. 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. Acoustic enclosures shall be provided to the DG set to control the noise pollution.	Complied	HCl is being recovered up to the possible extent. Stack height is adequate as per CPCB guideline. DG Set is having inbuilt acoustic enclosure to control noise pollution.	N/A	
14	The Company shall harvest surface as well as rainwater from the rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Complied	We have installed 120 KL underground tank and 2 nos 30 KL overhead tank to collect rain water from roof tops.	N/A	
15	Process emissions in the form of HCl shall be scrubbed with water and caustic scrubber and HCl recovered as by product. 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. Acoustic enclosures shall be provided to the DG set to control the noise pollution.	Complied	We have provide water and caustic scrubber to scrub HCl. Please note that HCl generating product is not manufactured during reporting period.	N/A	
16	The company shall adopt cleaner production technology to minimize the quantity of fresh water requirement and process effluent generation.	Complied	We have already taken various steps to optimized our fresh water consumption as well as wastewater generation up to possible extent with the available technologies.	N/A	
17	The company shall upload the status of compliance of	Complied	The status of compliance of	N/A	



	<p>the stipulated environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and the State Pollution Control Board. The criteria pollutant levels namely: SPM, RSPM, SO<sub>2</sub>, NO<sub>x</sub> (ambient levels as well as stack emissions) or critical sectorial parameters like VOC indicated for the p</p>		<p>stipulated environmental clearance conditions including results of monitored data is posted on our web site <a href="http://www.atulbio.co.in">www.atulbio.co.in</a></p>		
18	<p>Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.</p>	Complied	Details uploaded.		
19	<p>The company shall undertake following Waste Minimization measures :- Metering and control of quantities of active ingredients to minimize waste. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. Use of automated filling to minimize spillage. Use of "Close Feed" system into batch reactors. Venting equipment through vapor recovery system. Use of high pressure hoses for equipment clearing to reduce wastewater generation.</p>	Complied	Details uploaded.		
20	<p>Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per the Factories Act</p>	Complied	As ABL is situated in the Atul Complex, a mutual aid agreement with neighboring parent company Atul Ltd is already done who is having well qualified	N/A	



			resident doctors, whenever required instantly.		
21	The project authorities shall provide the chilled brine solution in secondary condenser for condensation of the VOCs. The project authority shall ensure that the solvent recovery shall not be less than 95%. The VOC monitoring shall be carried in the solvent storage area and data submitted to the Ministry.	Complied	Chilled brine solution is provided in secondary condenser for condensation of the VOCs. The same are provided with sufficient HTA and residence time to achieve maximum solvent recovery. Details uploaded		
22	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 All Transportation of Hazardous Chemicals shall be as per the MVA. 1989.	Complied	We are complying with all the requirement of MSIHC rule 1989 as amended in October, 1994 & January, 2000 & having proper storage and handling system, Onsite eme. plan, Licenses, safety report, sch 7, et	N/A	
23	Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys, etc. An area of 33% green belt and selection of plant species shall be as per the guideline of CPCB.	Being Complied	Hazardous chemicals are being stored in tanks, drums & carboys considering the storage quantity & chemical stored. As project is in implementation stage, green belt development is being carried out.		
24	Solvent management shall be as follows : Reactor shall be connected to chilled brine condenser system Reactor and solvent handling pump shall have mechanical seals	Complied	Details uploaded.		

	to prevent leakages. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery. Solvents shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. Entire plant s				
25	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. The concerned company shall undertake measures for firefighting facilities in case of emergency.	Complied	We have obtained authorization under Haz. Waste management rules 2016 and available in our valid current CCA No. AWH 96246, valid up to 30/06/2023 for handling, storage & disposal of hazardous waste.	N/A	
26	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) 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) Remaining 302.8 m3/d of normal effluent stream after mixing with other effluent like cooling tower (111.8 m3/d) shall be treated in ETP for primary and secondary treatment. The treated effluent after confirming	Complied	Details uploaded.		
27	Process emissions in the form of HCl shall be scrubbed with water and caustic scrubber and HCl recovered as by product. The emissions shall	Complied	We have provide water and caustic scrubber to scrub HCl. Please note that	N/A	

	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. Acoustic enclosures shall be provided to the DG set to control the noise pollution.		HCl generating product is not manufactured during reporting period.		
28	The Company shall harvest surface as well as rainwater from the rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Complied	We have installed 120 KL underground tank and 2 nos 30 KL overhead tank to collect rain water from rooftops.	N/A	
29	The company shall undertake following Waste Minimization measures :- Metering and control of quantities of active ingredients to minimize waste. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. Use of automated filling to minimize spillage. Use of 'Close Feed' system into batch reactors. Venting equipment through vapor recovery system. Use of high pressure hoses for equipment clearing to reduce wastewater generation.	Complied	Details uploaded		
30	Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.	Complied	Details uploaded.		
31	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 All	Complied	We are complying with MSIH rule 1989 as amended and having proper storage and handling system, Onsite	N/A	





	Transportation of Hazardous Chemicals shall be as per the MVA. 1989.		emergency plan, Licenses, reporting, etc All Transportation of Hazardous Chemicals is as per MVA		
32	The project authorities shall provide the chilled brine solution in secondary condenser for condensation of the VOCs. The project authority shall ensure that the solvent recovery shall not be less than 95%. The VOC monitoring shall be carried in the solvent storage area and data submitted to the Ministry.	Complied	Chilled brine solution is provided in secondary condenser for condensation of the VOCs. Solvent recovery is >95%.VOC monitoring done on regular bases and the results uploaded		
33	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. The concerned company shall undertake measures for firefighting facilities in case of emergency.	Complied	We have obtained authorization under Haz. Waste management rules2016 and available in our valid current CCA No. AWH96246, valid up to30/06/2023 for handling, storage &disposal of hazardous waste.	N/A	
34	Solvent management shall be as follows : Reactor shall be connected to chilled brine condenser system Reactor and solvent handling pump shall 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. Solvents shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment	Complied	Details uploaded		


	wherever solvent handling is done. Entire plant s				
35	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) 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) Remaining 302.8 m3/d of normal effluent stream after mixing with other effluent like cooling tower (111.8 m3/d) shall be treated in ETP for primary and secondary treatment. The treated effluent after confirming	Complied	Details Uploaded		
36	Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys, etc. An area of 33% green belt and selection of plant species shall be as per the guideline of CPCB.	Complied	Hazardous chemicals are being stored in tanks, drums & carboys considering the storage quantity & chemical stored. green belt photograph is attached		
37	The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and the State Pollution Control Board. The criteria pollutant levels namely: SPM, RSPM, SO2, NOx (ambient levels as well as stack emissions) or critical sectorial parameters like VOC indicated for the p	Complied	The status of compliance of stipulated environmental clearance conditions including results of monitored data is posted on our website www.atulbi	N/A	
38	The company shall adopt cleaner production	Complied	Steam condensate is	N/A	


	technology to minimize the quantity of fresh water requirement and process effluent generation.		being collected and used in place of raw water. Various wash water streams are being utilized in the further steps of the process.		
39	Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per the Factories Act	Complied	As ABL 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.	N/A	

## 7. General Conditions (Proponent):



S.No	Condition	Self Declaration	Remarks / Reason	Supporting Documents	Observation of IRO
1	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 & stacks of appropriate height as per the CPCB guideline have been provided to control emission from various vents. The scrubber water is being sent to ETP for further treatment.	N/A	
2	No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for	Complied	Any expansion will be carried out after prior approval of MoEF only.	N/A	

	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.				
3	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 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	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. Noise result uploade		
4	The company shall undertake eco developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Complied	Company has spent 15 lacs on CSR activities during report period.	N/A	
5	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: NOC and CCA from GPCB. Company has funded the project internally and hence not submitted the financial closure details	N/A	
6	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	N/A	
7	The project authorities shall strictly adhere to the stipulations made by the GPCB.	Complied	The company adheres to the compliances and has not exceeded the stipulation. This has been		



			certified by our Environmental auditors nominated by GPCB; through audit. relevant pages uploaded		
8	The Location of ambient air quality monitoring stations shall be decided in consultation with sated 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 Apart from this, 10 ambient air stations of Atul Ltd also monitors the surrounding of ABL	N/A	
9	The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at website of the Ministry of Environment and Forest at <a href="http://www.envfor.ni.in">http://www.envfor.ni.in</a> . 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 vernacul	Complied	Details uploaded.		
10	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 has spent Rs 15 lacs on CSR activities during report period	N/A	
11	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila parishad/Municipal Corporation. Urban local	Complied	EC sent to Pachayat etc. EC also available at company's website <a href="http://www.atulbio.co.in">www.atulbio.co.in</a>	N/A	


	body and the local NGO, if any, from who suggestions/representation, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.				
12	The implementation of the project vis-à-vis environmental action plan shall be monitored by Ministry's Regional office at Bhopal / SPCB / CPCB.	Complied	SPCB and MoEF is monitoring through their regular visits.	N/A	
13	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examination for all employees shall be undertaken on regular basis.	Complied	Company is imparting training to all new employees as well as regular employees at regular intervals. Company is doing pre medical checkup and routine medical checkup for employees	N/A	
14	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control 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.	Complied	At no time, the emissions exceeded the prescribed limits during report period. Stack results attached.		
15	The Gaseous emission (NOx, HCl, SO2 and SPM) and Particulate matter along with RSPM levels from various process units shall confirm to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit	Complied	The gaseous emissions confirms to the standards prescribed by GPCB. The maximum values confirms that at no time the emission went beyond std. No of failure of pollution control system in report period	N/A	








	shall not be restricted until the control measures are rectified to achieve the desired efficiency. Stack monitoring f				
16	The project proponent shall also comply with all the environmental protection measures and safeguards proposed in project report submitted to the ministry. All the recommendation made in respect of environmental management and risk mitigation measures relating to the project shall be implemented.	Complied	Company has complied with all the environmental protection measures and safeguards proposed in the report. Since the project did not require EIA or public hearing, no such recommendations mentioned.	N/A	
17	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 the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes.	Complied	EMP measures are implemented by 2010. EMS recurring cost details uploaded.		
18	A Separate environmental management cell equipped with full flagged laboratory facility shall be set up to carry out the environmental management and monitoring function.	Complied	Company has tie up with its parent company Atul Ltd where separate Environmental Management Cell equipped with full-fledged laboratory facilities for environment management and monitoring functions	N/A	
19	The Project Proponent shall inform the public that the project has been accorded environmental clearance by	Complied	Details uploaded.		

	<p>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 <a href="http://www.envfor.ni.in">http://www.envfor.ni.in</a>. 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 vernacul</p>				
20	<p>The project authorities shall strictly adhere to the stipulations made by the GPCB.</p>	Complied	<p>Unit adheres to the compliances &amp; has not exceeded the stipulation. This has been certified by Environmental auditors, an authorized agency &amp; nominated by GPCB; through Environmental audit every year.</p>	N/A	
21	<p>Usage of PPE's by employee/ workers shall be ensured.</p>	Complied	<p>Company have PPE policy in place and strictly follow for all level of employee.</p>	N/A	
22	<p>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.</p>	Complied	<p>Dedicated scrubbers &amp; stacks of appropriate height as per the CPCB guideline have been provided to control emission from various vents. The scrubber water is being sent to ETP for further treatment.</p>	N/A	
23	<p>The project proponent shall also comply with all the</p>	Complied	<p>Company has complied with all</p>	N/A	



	environmental protection measures and safeguards proposed in project report submitted to the ministry. All the recommendation made in respect of environmental management and risk mitigation measures relating to the project shall be implemented.		the environmental protection measures and safeguards proposed in the report apart from the recommendations made their in.		
24	The Gaseous emission (NO <sub>x</sub> , HCl, SO <sub>2</sub> and SPM) and Particulate matter along with RSPM levels from various process units shall confirm to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restricted until the control measures are rectified to achieve the desired efficiency. Stack monitoring f	Complied	Details uploaded.		
25	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control 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.	Complied	Monthly monitoring is being done by GPCB approved, NABL approved agencies. At no time, the emissions exceeded the prescribed limits during report period.	N/A	
26	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.	Being Complied	As project is in implementation stage, CER activities will be carried out as committed.	N/A	
27	The overall noise level in and around the plant area shall be kept well within the	Complied	In built Acoustic enclosure, silencer and		



	standard by providing noise control measures including acoustic hoods silencers, enclosures etc. on all source of noise 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)		insulation are provided on all source of noise generation to keep over all noise level within the stipulated standards like DG set, etc. Noise result uploade		
28	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examination for all employees shall be undertaken on regular basis.	Complied	Company is imparting training to all new employees as well as regular employees at regular intervals. Medical examinations are regularly conducted & records of the same are maintained.		
29	A Separate environmental management cell equipped with full flagged laboratory facility shall be set up to carry out the environmental management and monitoring function.	Complied	Company has tie up with its parent company Atul Limited where separate Environmental Management Cell equipped with full-fledged lab. facilities to carry out the env. management & monitoring functions.	N/A	
30	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/representation, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.	Complied	Latest submission to the Panchayat, Zila parishad, District Industrial Centre was distributed on November 11, 2016. The clearance letter is available at company's website <a href="http://www.atulbio.co.in">www.atulbio.co.in</a>	N/A	

31	<p>No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.</p> <p>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.</p>	Complied	<p>Unit has obtained prior Environment Clearance from Ministry vide EC No. SEIAA/GUJ/EC/5(f) dated June 24, 2021 for proposed expansion of Active Pharmaceutical Ingredients (API).</p>	N/A	
32	<p>The Location of ambient air quality monitoring stations shall be decided in consultation with sated 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.</p>	Complied	Details uploaded.		
33	<p>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.</p>	Complied	<p>Start date: April 2009 Completion date: March 2010</p> <p>Final We have obtained NOC &amp; CCA from GPCB. Company has funded the project internally &amp; hence not submitted the financial closure details.</p>	N/A	
34	<p>The implementation of the project vis-à-vis environmental action plan shall be monitored by Ministry's Regional office at Bhopal / SPCB / CPCB.</p>	Complied	<p>SPCB and MoEF&amp;CC is monitoring through their regular visits.</p>	N/A	
35	<p>The company shall undertake eco developmental measures including community welfare measures in the project area for the overall improvement of the environment.</p>	Being Complied	<p>As project is in implementation stage, CER activities will be carried out as committed.</p>	N/A	

36	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 the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes.	Complied	A separate budget is being allocated every year to comply with all the legal requirement stipulated by SPCB,CPCB & MoEF&CC apart from upkeep of pollution control systems & facilities. Details uploaded		
37	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 the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes.	Complied	A separate budget is being allocated every year to comply with all the legal requirement stipulated by SPCB,CPCB & MoEF&CC apart from upkeep of pollution control systems & facilities. Details uploaded		
38	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	N/A	
39	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 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	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. Noise result uploade		
40	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical	Complied	Company is imparting training to all new employees as well as regular		



	<p>medical examination for all employees shall be undertaken on regular basis.</p>		<p>employees at regular intervals. Medical examinations are regularly conducted &amp; records of the same are maintained.</p>		
41	<p>The implementation of the project vis-à-vis environmental action plan shall be monitored by Ministry's Regional office at Bhopal / SPCB / CPCB.</p>	Complied	<p>SPCB and MoEF&amp;CC is monitoring through their regular visits.</p>	N/A	
42	<p>The Location of ambient air quality monitoring stations shall be decided in consultation with sated 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.</p>	Complied	<p>Details uploaded.</p>		
43	<p>At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control 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.</p>	Complied	<p>Monthly monitoring is being done by GPCB approved, NABL approved agencies. At no time, the emissions exceeded the prescribed limits during report period.</p>		
44	<p>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/representation, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.</p>	Complied	<p>EC submission to the Panchayat, Zila parishad ,District Industrial Centre was distributed on November 11,2016. The clearance letter is available at company's website www.atulbi</p>	N/A	

45	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 & stacks of appropriate height as per the CPCB guideline have been provided to control emission from various vents. The scrubber water is being sent to ETP for further treatment.	N/A	
46	The Gaseous emission (NOx, HCl, SO2 and SPM) and Particulate matter along with RSPM levels from various process units shall confirm to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restricted until the control measures are rectified to achieve the desired efficiency. Stack monitoring f	Complied	The gaseous emissions confirms to the standards prescribed by GPCB. The maximum values confirms that at no time the emission went beyond std. No of failure of pollution control system in report period		
47	The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at website of the Ministry of Environment and Forest at <a href="http://www.envfor.ni.in">http://www.envfor.ni.in</a> . 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	Complied	Details uploaded.		

	which one shall be in the vernacul				
48	The company shall undertake eco developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Complied	Company has spent 1.42 lacs on CSR activities during report period.	N/A	
49	A Separate environmental management cell equipped with full flagged laboratory facility shall be set up to carry out the environmental management and monitoring function.	Complied	Company has tie up with its parent company Atul Limited where separate Environmental Management Cell equipped with full-fledged lab. facilities to carryout the env. management & monitoring functions.	N/A	
50	No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	Complied	Unit has obtained prior Environment Clearance from Ministry vide ECNo.SEIAA/GUJ/EC/June 24,2021 for proposed expansion of Active Pharmaceutical Ingredients (API).	N/A	
51	The project proponent shall also comply with all the environmental protection measures and safeguards proposed in project report submitted to the ministry. All the recommendation made in respect of environmental management and risk mitigation measures relating to the project shall be implemented.	Complied	Company has complied with all the environmental protection measures and safeguards proposed in the report. Since the project did not require EIA or public hearing, no such recommendations mentioned.	N/A	

52	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: April2009 Completion date: March 2010Final approval: NOC and CCA from GPCB. Company has funded the project internally and hence not submitted the financial closure details	N/A	
53	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 has spent Rs 1.42 lacs on CSR activities during report period	N/A	
54	The project authorities shall strictly adhere to the stipulations made by the GPCB.	Complied	Unit adheres to the compliances & has not exceeded the stipulation. This has been certified by Environmental auditors, an authorized agency& nominated by GPCB; through Environmental audit every year.	N/A	

**\*\*Note : N/A - Not Available**

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