



By Hand Delivery / Courier / R.P.A.D

Ref.: SRF/ENV/MoEFCC/2023-24/02

June 09, 2023

To,
The Scientist,
Integrated Regional Office,
Ministry of Environment, Forest and Climate Change,
Room no 407, Aranya Bhawan, Near CH-3 Circle, Sector 10A,
Gandhinagar, Gujarat – 382010.

Sub.: Submission of half-yearly compliance report for the period of December – 22 to May -23

Ref.: 1) EC Identification No.- EC23A004GJ118457 File No.- IA-J-11011/129/2021-IA-II(I) Dated-
18/05/2023
2) EC Letter No. SEIAA/GUJ/EC/5(f)/2947/2022 DATED 17-Dec-22

Dear Sir,

This has reference to the above & as per section 10 of EIA notification, dated 14th September, 2006, we are submitting herewith half yearly compliance report through hard copy and e-mail of accorded Environment Clearance (EC) from MoEFCC Delhi for the period of December 22 to May 23.

We hope you would find the same in order.

Thanking you.

Yours faithfully,

For **SRF LIMITED**


HARENDRA SINGH DAGUR
(EXECUTIVE VICE PRESIDENT, SITE HEAD)

Encl: Half yearly compliance report.

SRF LIMITED

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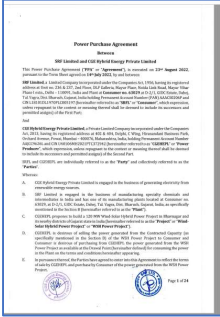
An ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 Certified Company

Copy to;

1. The Secretary, Forest & Environment Department, Government of Gujarat, Sachivalay, 8th Floor, Gandhinagar (Gujarat)
2. The Member Secretary, Central Pollution Control Board, Parivesh Bhavan, CBD-cum Office Complex, East Arjun Nagar, New Delhi – 110 032
3. The Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector 10A, Gandhinagar – 382 010.
4. The Secretary, SEAC, C/o. GPCB, Gandhinagar – 382 010
5. State Level Environment Impact Assessment Authority, Gujarat, Gujarat Pollution Control Board, "Paryavaran Bhavan" Sector 10-A, Gandhinagar – 382 010
6. Monitoring Cell, Ministry of Environment & Forest, Paryavaran Bhavan, CGO Complex, New Delhi – 110 003.





Sr. No.	Conditions	Compliance Status
Compliance of EC Identification No.- EC23A004GJ118457 File No.- IA-J-11011/129/2021-IA-II(I) Dated- 18/05/2023		
A	Specific Condition:	
i	<p>The PP shall develop an additional greenbelt over an area of at least 2,34,450 m² (20% within the premises + 1,40,00 m² (11.8%) by planting 1,17,000 trees at an adjacent alternative land given by GIDC, remaining 60,415 (5.1%) greenbelt will be developed by march 2024 and rest within one year of grant of EC. The saplings selected for the plantation should be of sufficient height, preferably 6-ft. The budget earmarked for the plantation shall be kept in a separate account and should be audited annually. The PP should annually submit the audited statement along with proof of activities viz. photographs (before & after with geo-location date & time), details of expert agency engaged, details of species planted, number of species planted, survival rate, density of plantation etc. to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.</p>	<p>Total 11,81,776.35 sq. meter land area is available at site; Undertaking is submitted to develop green belt 4,23,866 sq.mt (35.87%) out of which 3,63,451 sq. mt. (30.8%) green belt already developed.</p> <p>Out of which, 2,23,451 sq. mt. (19%) within premises + 1,40,000 sq.mt. (11.8%) at an adjacent alternative land given by GIDC. Remaining 60,415 sq.mt (5.1%) green belt will be developed by Mar-24.</p> <p>Photographs of the same is attached as per Annexure - 1</p>
ii	<p>A separate Environmental Management Cell (having qualified persons with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions. PP shall engage Managing Director- Head of works- Plant manager- Head Environment. In addition to this one safety & health officer as per the qualification given in Factories Act 1948 shall be engaged within a month of grant of EC. PP should annually submit the audited statement of amount spent towards the engagement of qualified persons in EMC along with details of person engaged to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.</p>	<p>We have separate Environmental Management Cell equipped with full-flagged environmental laboratory facility to carry out environmental management and monitoring function. The report of this group is directly to head of the location.</p> <p>Lab equipment's available on laboratory: Spectrometer, DO meter, BOD Incubator, pH meter, TDS/Conductivity Meter, TOC/TN analyzer, Ammonical Nitrogen Distillation Equipment, Fluoride and Ammonium Ion meter etc.</p>
iii	<p>The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the</p>	<p>Noted and will be complied.</p>

Sr. No.	Conditions	Compliance Status
	<p>project shall be implemented. The budget proposed under EMP is ₹ 236.49 Crore (Capital cost) and ₹ 84.73 Crore per annum (Recurring cost) shall be kept in separate account and should be audited annually. The PP should submit the annual audited statement along with proof of implementation of activities proposed under EMP duly supported by photographs (before & after with geo- location date & time) and other document as applicable to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.</p>	
iv	<p>The Total water requirement is 43330 m3/day of which fresh water requirement of 21521 m3/day will be met from GIDC Water Supply, rest 21809 m3/day water will be recycled water. The PP should ensure that water supply should not be above the permissible limit as mentioned in the letter and fresh water shall be withdrawn only after obtaining valid agreement from Concerned Authority. The PP should submit the details of utilization to the Integrated Regional Office (IRO), MoEF&CC before 1st July of every year for the activities carried out during the previous year.</p>	<p>Out of 43330 m3/day fresh water requirement, 20984 m3/day is taken in CCA.</p> <p>In last six months (Dec-22 to May-23), average water consumption 10211.42 KLD. 3384 KLD treated effluent (ETP RO & Utility RO Permeate) is reused in cooling tower makeup.</p>
v	<p>The plant is not based on the total zero liquid discharge system. 9731 m3/day of industrial effluent from softener/ DM Plant reject + Boiler Blow down + Cooling tower Blow down (including Captive Power Plant) shall be sent to separate ETP (UF&RO including primary treatment). After treatment, 8758 m3/day the treated shall be reused in cooling tower/process and 973 m3/day RO reject after confirming the GPCB discharge norms shall be sent for disposal in to GIDC sewer line – Dahej pipeline / Common disposal system up to the sea. Total 7654 m3/day treated (6681 m3/day treated industrial effluent + 973 m3/day RO reject after confirming the GPCB standard) shall be sent for disposal in to GIDC sewer line – Dahej pipeline / Common disposal system up to the sea for final disposal at NIO designated points. 650 m3/day of sewage shall be treated separately to confirm the GPCB standard shall be reuse in development of greenbelt</p>	<p>In last six months Dec-22 to May-23, effluent generation was 980 KLD (MEE & ETP).</p> <p>In last six months Dec-22 to May-23, Utility Low COD and TDS effluent is 2190 KLD. RO Permeate: 1109 KLD reused in Cooling tower make up. Utility effluent (from DM Reject, Cooling Tower Blow Down, and Softener Reject) is treated through Physico-chemical ---> Ultra-filtration ---> Reverse Osmosis System ----> Reuse in Cooling Tower. Total 3384 KLD of Utility RO was reused in cooling tower.</p> <p>1770 KLD treated effluent is discharged through GIDC drain.</p>


Sr. No.	Conditions	Compliance Status
	/ plantation within premises and in monsoon season it shall be reuse in cooling tower/process.	
vi	No banned chemicals shall be manufactured by the project proponent. No banned raw materials shall be used in the unit. The project proponent shall adhere to the notifications/guidelines of the Government in this regard.	Complied. No banned chemicals as per Govt. rules are manufactured.
vii	The project proponent shall utilize modern technologies for capturing of carbon emitted and shall also develop carbon sink/carbon sequestration resources capable of capturing more than emitted. The implementation report shall be submitted to the IRO, MoEF&CC in this regard.	Noted and will be complied.
viii	The PP shall use biofuel along with a reduction of coal by 25% to 35% over the period of 4 to 5 years, PP shall also use 30 MW renewable energy (hybrid power-solar/wind).	<p>The power purchase agreement is signed of 30 MW for the usage of solar/wind hybrid energy. Currently 2 MW renewal energy is used through grid. The agreement copy of the same is shown below;</p> <div style="display: flex; justify-content: space-around;">   </div> <p>We are going to take trial with biofuel along with coal by Dec-23. Bio fuel will be used based on successfully trials with coal.</p>
ix	The project proponent shall comply with the environment norms for Organic Chemical Industry as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 608 (E), dated 21.7.2010 under the provisions of the Environment (Protection) Rules, 1986.	<p>Complied.</p> <p>We are complying with National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended time to time.</p> <p>The generated effluent is being treated in full-fledged Effluent Treatment Plant (ETP). Effluent contains high TDS is being treated to Multiple Effect Evaporator (MEE) after ETP and generated salt is disposed off to TSDF site. Effluent having low TDS is being treated in separate ETP.</p> <p>Company carries out the monitoring on monthly basis by third party – M/S. BEIL Infrastructure Limited-Ankleshwar. (Recognized NABL Laboratories no.</p>

Sr. No.	Conditions	Compliance Status
		<p>NABL/TC-8141 dated 07/11/2021 and valid up to 06/11/2023)</p> <p>Detailed analysis of monitoring results is attached as per Annexure-2.</p>
x	<p>The project proponent shall comply with the environment norms for Pesticide Industry as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 446(E), dated 13.6.2011 under the provisions of the Environment (Protection) Rules, 1986.</p>	<p>Complied.</p> <p>We are complying with the environment norms for Pesticide Industry as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 446(E), dated 13.6.</p> <p>The generated effluent is being treated in full-fledged Effluent Treatment Plant (ETP). Effluent contains high TDS is being treated to Multiple Effect Evaporator (MEE) after ETP and generated salt is disposed off to TSDF site. Effluent having low TDS is being treated in separate ETP. Detailed analysis of monitoring results is attached as per Annexure- 3.</p> <p>Company carries out the monitoring on monthly basis by third party – M/S. BEIL Infrastructure Limited-Ankleshwar. (Recognized NABL Laboratories no. NABL/TC-8141 dated 07/11/2021 and valid up to 06/11/2023)</p> <p>Detailed analysis of stack monitoring results attached as per Annexure-3.</p>
xi	<p>All necessary precautions shall be taken to avoid accidents and action plan shall be implemented for avoiding accidents. The project proponent shall implement the onsite/offsite emergency plan/mock drill etc. and mitigation measures as prescribed under the rules and guidelines issued in the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996.</p>	<p>On-off site emergency plan is available and reviewed on yearly basis. The content of the same is attached as per Annexure - 4.</p> <p>The latest mock drill was conducted on 04-May-23. The mock drill report of the same is attached as per Annexure-5.</p>
xii	<p>The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97% with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.</p>	<p>Regular VOC monitoring is carried out. Form-37 workplace VOC monitoring report is attached as per Annexure - 6</p>
xiii	<p>The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.</p>	<p>Noted and complied.</p>


Sr. No.	Conditions	Compliance Status
(xiv)	The occupational health center for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.	<p>We have OHC center available manned by male nurse for 24X7. Full time medical officer (FMO) is appointed. Female nurse is also available for female employees. All required equipment's are as recommended in Gujarat Factories rule and additional equipment's also available in OHC as per site condition and chemicals handled.</p> <p>The personal protective equipment (PPE) is provided to workers & employees working in noisy areas based on the duties.</p>
(xv)	Training shall be imparted to all employees on safety and health aspects for handling chemicals. Safety and visual reality training shall be provided to employees. Action plan for mitigation measures shall be properly implemented based on the safety and risk assessment studies.	<p>Regular training of workers and staff is conducted on Safety and Health aspects for chemical handling. Our training center is approved by Gujrat State government under Rule-111A. We have dedicated manpower & facility for imparting training on EHS aspects. Below is the training summary sheet of Jan-23 of employees and contractors. Training attendance sheet is attaches as per Annexure – 7.</p> <p>Periodical medical examination for all workers is being done at the time of joining and subsequently medical exam at the frequency of once in six months.</p>
(xvi)	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.	<ul style="list-style-type: none"> • We have prepared Safe operating procedure for hazardous process and material handling process. • We have provided Smoke detectors and sprinkler system in go down/warehouse, drum storage area etc. • We have installed Fire hydrant system as per GFR 66 A norms. • We have implemented Permit to work system for hazardous work in the plant • We are maintaining Emergency handling facilities in operational condition at all time to avoid failures. • We have implemented HSE management system as per CCPS guidelines.
(xvii)	<p>The solvent management shall be carried out as follows:</p> <p>(a) Reactor shall be connected to chilled brine condenser system.</p> <p>(b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages.</p> <p>(c) Solvents shall be stored in a separate space specified with all safety measures.</p> <p>(d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.</p>	<p>(i) Reactors are connected to chilled brine condensers system.</p> <p>(ii) Mechanical seals are provided to prevent leakages.</p> <p>(iii) Solvent recovery for all solvent achieved more than 95% recovery by providing sufficient heat transfer area and residence time to the condensers.</p> <p>(iv) Solvent storage separated with compliance of PESO guideline.</p> <ul style="list-style-type: none"> - Dyke wall. - Nitrogen blanketing. - Flame Proof fittings - Required permissions and distances from adjacent building. - Fencing arrangement. - Controlled entries in solvent tanks

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	(f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation	(v) Proper earthing as per Indian standard and PESO guidelines and IS 600079 have been provided. (vi) Entire plant is classified under hazardous area classification (IS5572) & provided flameproof equipment accordingly. The solvent storage tanks are provided with Nitrogen blanketing (PCV & PRV) & flame arrestor The solvent storage tanks are provided with Nitrogen blanketing (PCV & PRV) & flame arrestor.
(xviii)	The PP shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapor recovery system. (f) Use of high pressure-hoses for equipment cleaning to reduce wastewater generation.	Waste minimization measures taken as follow; (i) We have installed flow meters, load cell & Level transmitter for metering & control of active ingredient (ii) Re-use by-products as raw material like NH3 solution, 30% HCl, Hypo, wherever applicable. (iii) All filling machine are provided with automated filling facility to avoid spillage. (iv) All ingredient feed to reactor in close feed system like Pipeline, Powder transferring system. (v) Using high pressure jet machine & spray ball for cleaning to generate low wastewater Photographs attached herewith. <div style="display: flex; flex-wrap: wrap;">     </div>
B	<u>GENERAL CONDITIONS:</u>	
(i)	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and	Expansions will be done after taking permissions from MoEFCC/SEIAA and after getting NOC.



Sr. No.	Conditions	Compliance Status
	Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	
(ii)	The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans- Boundary Movement) Rules, 2016 and other rules notified under various Acts	We SRF limited are strictly complying the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time and all transportation of Hazardous Chemicals are as per the Motor Vehicle Act (MVA), 1989. Haz chemical storage, handling and control details are attached as per Annexure - 8 . We are strictly following applicable provisions of MSIHC rules. - Audit - Onsite emergency plan. - Reporting of Major accident. - Safety audits - Labelling of vehicles. All vehicles are with GPS System for hazardous Waste transportation.
(iii)	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.	Complied. We are in the transition phase of changing CFL to LED lights. In FY 22-23, 85 mWh is saved through LED lights implementation.
(iv)	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	To control noise level, we have provided acoustic enclosures in all four DG sets, segregation of utility areas. Based on noise level sitting arrangements have been done in separate areas to minimize personal exposure. To minimize noise pollution vibrating pads, low noise making machineries have been provided. Ambient noise monitoring level is being checked on monthly basis to check efficiency of controls. The personal protective equipment (PPE) is provided to workers & employees working in noisy areas. Ambient Noise Monitoring Report attached herewith as per Annexure- 9 .
(v)	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	We have spent around INR 60 crores towards infrastructure development, rural education program, sanitation, swachta kit, drinking water facilities in last three years. In FY 22-23, we have spent INR 295 Lakhs in surrounding villages nearer Dahej plant. The CSR activity details are attached as per Annexure-10 .




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(vi)	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/pollution control measures shall not be diverted for any other purpose.	<p>Company has earmarked sufficient funds towards capital cost and recurring cost every year to meet/compliance the stipulated conditions by the Ministry of Environment, Forest and Climate Change as well as the State Government.</p> <p>Company has spent INR 4.42 crore toward capital investment in ETP & INR 80+ crores in operation.</p>
(vii)	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.	We have submitted the Environmental Clearance letter. There are no suggestions/ representations till date.
(viii)	The project proponent shall also upload/submit six monthly reports on Parivesh Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six-monthly compliance status report shall be posted on the website of the company.	<p>Six Monthly reports on Environmental Clearance conditions status submitted regularly to respective Regional Office of MoEF&CC, the respective Zonal office of CPCB and SPCB and six-monthly compliance status reports posted on the company website www.srf.com.</p> 
(ix)	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.	<p>The environmental statement for each financial year ending 31st March in Form –V submitted to the board.</p> <p>Copy of the same is enclosed herewith as per Annexure-11</p>


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(x)	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 and at https://parivesh.nic.in/ . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry	<p>The condition regarding information the public about the accorded environmental clearance by the MoEF had published in local newspaper.</p> <p>Copy of each of the same forwarded to the concerned Regional Office of the Ministry.</p> <p>Copy of advertise & submitted to concerned Regional Office of the Ministry is attached as per Annexure-12.</p>
(xi)	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	<p>The financial information details are available on company website https://www.srf.com/investors/financial-information/.</p> <p>In last two years, below projects are completed</p> <ul style="list-style-type: none"> - 175 TPH Boiler (20.1) MW CPP - Polytetrafluoroethylene (PTFE) – under pre-commissioning stage.
(xii)	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.	Noted.

Compliance of EC Letter No. SEIAA/GUJ/EC/5(f)/2947/2022 DATED 17-Dec-22		
A	Specific Condition:	
1	PP shall comply conditions of any subsequent amendment or expansion or change in product mix, after the 31st December 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.	Noted and complied.
2	PP shall carry our proposed projects/ activities in respect of active pharmaceutical Ingredients (API) as per the amended EIA notification vide S.O 1223 (E) dated 27/03/2020 and subsequent amendments.	Noted.
3	PP shall submit six monthly compliance report of environmental clearance without fail and the same shall be critically assessed by the regulatory authority.	<p>Six Monthly reports on Environmental Clearance conditions status submitted regularly to respective Regional Office of MoEF&CC, the respective Zonal office of CPCB and SPCB and six-monthly compliance status reports posted on the company website www.srf.com.</p> 
4	<p>(a) R & D product shall be of similar chemistry in line with EIA Notification wide S.O. 1223 (E) dated 27/03/2020 and the pollution control load will remain the same as committed.</p> <p>(b) Project proponent shall not take continues/ commercial production of the R & D materials. Necessary approvals shall be obtained from the concern authorities prior to commercial production of R & D materials.</p>	Noted and complied.


	<p>(c) Unit shall submit relevant details of R & D products like raw materials, its safety measures to the regulatory authority well before R & D activity.</p> <p>(d) Unit shall submit relevant details of R & D products like different wastes generated (Quantity & Quality) and its management to the regulatory authority within a month of R & D activity.</p>	
5	<p>Unit shall install CEMS [Continuous Emission Monitoring System] in line to CPCB directions to all SPCB vide letter no. B-290161/04/106PC1-1/15401 dated 05/02/2014 for effluent discharge and air emission as per pollutants discharge/emission from respective project and an arrangement shall also be done for reflecting the online monitoring results on the company's server, which can be assessable by the GPCB/CPCB on real time basis. [For Small/Large/Medium (Red Category) & Whichever (Air emission & Effluent discharge) is applicable].</p>	<p>Continuous Emission Monitoring System for effluent discharge and stacks emissions are installed in unit. An arrangement is also available for reflecting the online monitoring results on the company's server, which can be accessed by the GPCB on real time basis.</p> <p>Photographs of the same are attached as per Annexure - 13.</p>
6	<p>Close loop solvent recovery system with adequate condenser system shall be provided to recover solvent vapors in such a manner that solvent recovery shall be maximum and recovered solvent shall be reused in the process within the premises.</p>	<p>Maximum recovery of all solvents is achieved by providing sufficient heat transfer area and residence time to the condenser. Close loop solvent recovery system with condenser system is in place for recovery of solvents. We are using solvent like toluene, MDC, DMF, Butyl acetate, acetonitrile, acetic acid etc. and the recovery is more than 95%.</p>
7	<p>Leak detection and repair (LDAR) program shall be prepared and implemented as per the CPCB Guidelines. LDAR Logbooks shall be maintained.</p>	<p>We have our preventive maintenance program covering pump seals, compressor seals, PRD's, PRV's Heat Exchangers for leak identification and repairing in place as per preventive maintenance schedules for all plants on defined frequency & implemented as per CPCB guidelines.</p> <p>Details of Logbook of LEL/Gas detector list is attached as per Annexure - 14.</p>
8	<p>All measures shall be taken to avoid soil and ground water contamination within premises.</p>	<p>Work areas, chemical storage areas and chemical handling areas have pucca flooring with impervious flooring. All such floorings have containment provision to collect accidental spillage at one place and to avoid soil and ground contamination.</p>
9	<p><u>Safety and Health:</u></p>	
	<p>a. Unit shall obtain all required permission from narcotics Control Bureau from manufacturing, storage, and handling of Acetic Anhydride & any such chemicals.</p>	<p>Complied. The registration of acetic anhydride is available as shown below;</p>

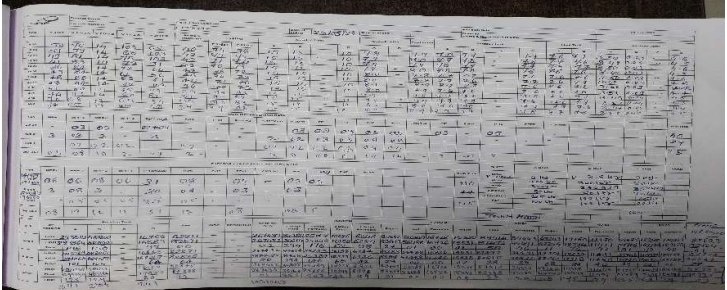
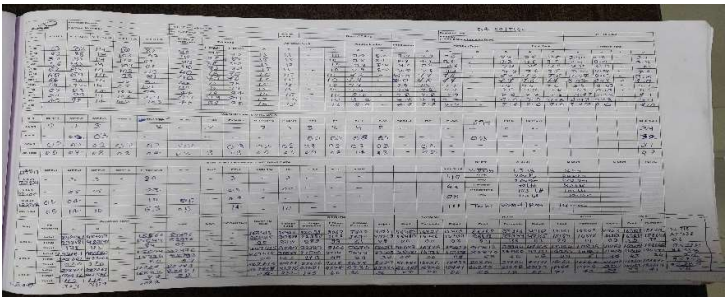
		
	<p>b. PP shall obtain PESO Permission for the storage and handling of hazardous chemicals.</p>	<p>We have obtained the PESO permission for the storage and handling of hazardous chemicals. The list of PESO permissions is attached as per Annexure - 15.</p>
	<p>c. PP shall provide Occupational Health Centre (OHC) as per the provisions under the Gujarat factories Rule 68-U.</p>	<p>We have OHC center available manned by male nurse for 24X7. Full time medical officer (FMO) is appointed. Female nurse is also available for female employees. All required equipment's are as recommended in Gujarat Factories rule and additional equipment's also available in OHC as per site condition and chemicals handled.</p>  <p>We have BMW authorization valid up to 6th April 2027. The same is attached as per Annexure - 16.</p>
	<p>d. PP shall obtain fire safety certificate / fire No- Objection certificate (NOC) from the concern authority as per the prevailing rules/ Gujrat fire prevention and life safety measures act, 2016.</p>	<p>Fire safety certificate is applied for renewal and the copy of the same is attached as per Annexure-17</p>
	<p>e. Unit shall adopt functional operations/ process automations system including emergency response to eliminate risk associate with the hazardous processes</p>	<p>Complied. The operation/process associated with hazardous chemicals are DCS operated and interlinked with emergency alarms.</p>
	<p>f. PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation n plan in the manufacturing area in case of any emergency and accident.</p>	<p>We are conducting quarterly on-site mock drills. The latest mock drill was conducted on 04-May-23. The mock drill report of the same is attached as per Annexure- 5.</p>


	<p>g. PP shall install adequate fire hydrant system with foam trolley attachment within premises and separate storage of water for the same shall be insured by PP.</p>	<p>We have installed Fire hydrant system with 2000 KL dedicated storage tank and pump house with 4 nos. of main diesel pumps (410 m3/HR each) and 2 jockey pumps. Entire site is protected with fire hydrant network. Monthly inspection of fire hydrant system is being carried out by third party as per Annexure-18.</p>																																																																																																																																																																										
	<p>h. PP shall take all the necessary steps for the control of storage hazards within premises ensuring incompatibility of storage raw material and ensure the storage keeping safe distance as per the prevailing guidelines of the concerned authority.</p>	<p>The hazardous raw material in Raw material and Finished Goods area are stored as per compatibility of material.</p> <table border="1" data-bbox="787 462 1421 882"> <thead> <tr> <th colspan="10">General recommendations for the separation or segregation of different classes of dangerous substances</th> </tr> <tr> <th>Class</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> </tr> <tr> <th></th> <th>2.1</th> <th>2.2</th> <th>2.3</th> <th>3.1</th> <th>3.2</th> <th>3.3</th> <th>4.1</th> <th>4.2</th> <th>5.1</th> </tr> </thead> <tbody> <tr> <td colspan="10">C Compressed Gases</td> </tr> <tr> <td>2.1 Flammable</td> <td>ISOLATE</td> <td>Keep Apart</td> <td>ISOLATE</td> <td>Segregate from</td> 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	<p>i. PP shall take all the necessary steps for human safety in premises to ensure that no any harm is caused to any worker/employee or labor within premises.</p>	<p>We have system in place for PPE, work permit, safe chemical handling, periodic medical checkup etc. for workers/employee for human safety.</p>																																																																																																																																																																										
	<p>j. Flame proof electrical fitting shall be provided in the premises, wherever applicable</p>	<p>We have provided flame proof electrical fittings in the process plants. Electrical fittings are selected as per hazardous area classification.</p>																																																																																																																																																																										
	<p>k. Unit shall never store drum/barrels/carboys of incompatible material/chemical together.</p>	<p>We have separate storage facility for storage of drum/barrels/carboys and incompatible materials/chemicals are stored separately in the facility.</p>																																																																																																																																																																										
	<p>l. Unit shall provide effective isolation for Process area and storage of hazardous chemicals.</p>	<p>Process area and hazardous chemicals storage area are provided safe isolation in factory premises. Hazardous chemical Storage details are attached as per Annexure - 8.</p>																																																																																																																																																																										
	<p>m. Unit shall provide chlorine leakage control emergency kit and FRP hood with scrubber system for chlorine safety.</p>	<p>Complied. Below control measured are provided at chlorine storage;</p> <div style="display: flex; justify-content: space-around;">    </div> <p style="font-size: small; text-align: center;"> SCBA @ Chlorine Tonner storage Chlorine Tonner Safety Hood connected with CAS Scrubber system @ Chlorine storage </p>																																																																																																																																																																										

	<p>n. Unit shall Store Bromine Bottle in cool dry separate area, out of direct sunlight.</p>	<p>Complied.</p>  <p>Dyke Wall @ Bromine Storage Sprinkling system @ Bromine Storage</p>
	<p>o. Unit shall provide water sprinkler to the ammonia storage cylinder.</p>	<p>Complied. Water sprinkler system is provided at ammonia cylinder storage.</p>
	<p>p. Unit shall provide safety valve and rapture disc, as well as auto dump or auto quench/, suppress system for nitration vessel safety</p>	<p>Complied. Safety valves, rupture disks, PRV's, PRD's etc requirements are identified during HAZOP study and provided.</p>
	<p>q. Unit shall provide safety valve and rapture disc, as well as auto dump or auto quench/, suppress system for exothermic reaction vessel safety</p>	<p>Complied. Safety valves, rupture disks, PRV's, PRD's etc requirements are identified during HAZOP study and provided.</p>
	<p>r. Unit shall provide effective fire hydrants, water monitors & foam application system at solvent storage tank farm area.</p>	<p>Below fire fighting system are provided;</p> 


	<p>s. Unit shall provide adequate safety system such as water sprinklers, water curtains, foam pouring system etc. to restrict cascade fire emergency in solvent tank farm.</p>	<p>Complied.</p> <p>Water curtain in AHF area</p> <p>Water Sprinkler System : - > Hydrogen Storage shed, Ammonia, Bromine storage area, CS2 storage area, Ethylene storage shed</p>
<p>A.2</p>	<p><u>WATER:</u></p>	
<p>10</p>	<p>Total water requirement for the project shall not exceeds 50035 KLD. Unit shall reuse 22668KLD of treated industrial effluent within premises. Hence, fresh water requirement shall not exceed 27367 KLD and it shall be met through GIDC water supply only. Prior permission from concerned authority for withdrawal of water shall be obtained.</p>	<p>In last six months (Dec-22 to May-23), average water consumption 10211.42 KLD. 3384 KLD treated effluent (ETP RO & Utility RO Permeate) is reused in cooling tower makeup.</p> <p>We have taken prior permission from GIDC for water supply of 9000 KLD. Additional 6000 KLD desalination water usage is agreed upon the agreement with GIDC. Entire quantity is metered through meter, monthly billing done on metered quantity. The Copy of GIDC permission for Water Consumption is shown below.</p>



		
11	The industrial effluent generation from the project shall not exceed 7654 KLD.	In last six months Dec-22 to May-23, effluent generation was 980 KLD (MEE & ETP)
12	<p>Management of industrial effluent shall be as under:</p> <ul style="list-style-type: none"> The quantity of industrial effluent from manufacturing process and other ancillary industrial operations shall be 30321 m3/day. Total 7654 m3/day treated (6033 m3/day treated industrial effluent + 1621 m3/day RO reject after confirming the GPCB standard) shall be sent for disposal in to GIDC sewer line - Dahej pipeline / Common disposal system up to the sea for final disposal at NIO designated points. 650 m3/day of sewage shall be treated separately to confirm the GPCB standard shall be reuse in development of greenbelt / plantation within premises and in monsoon season it shall be reuse in cooling tower/process. 	<p>In last six months (Dec-22 to May-23), average water consumption 10211.42 KLD. 3384 KLD treated effluent (ETP RO & Utility RO Permeate) is reused in cooling tower makeup.</p> <p>We have taken prior permission from GIDC for water supply of 9000 KLD. Additional 6000 KLD desalination water usage is agreed upon the agreement with GIDC. Entire quantity is metered through meter, monthly billing done on metered quantity.</p> <p>Generated domestic wastewater is 242 KLD.</p>
13	Unit shall discharge wastewater to CETP only after complying with norms prescribed by GPCB in order to achieve no adverse impact on environment and human health	The treated wastewater analysis report from Dec-22 to May-23 is attached as per Annexure- 5.
14	Domestic wastewater generation shall not exceed 650KL/Day for proposed project and it shall be treated in ST. Treated sewage shall be utilized for gardening and plantation purpose within premises after achieving on-land discharge norms prescribed by the GPCB.	Generated domestic wastewater is 242 KLD & treated in separate STP and treated sewage utilized for gardening and plantation within premises as per on-land discharge norms prescribed by the GPCB. The STP inlet and outlet report is attached as per Annexure – 5 .
15	During monsoon season when treated sewage may not be required for the plantation / Gardening / Green belt purpose, it shall be stored within premises. There shall be no discharge of waste water outside the premises in any case.	During monsoon season treated sewage will be utilized in cooling tower makeup. A guard pond of 813 KL is provided for treated sewage.

16	Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water during rainy days.	We have provided 5500 KL capacity Guard Pond at site for treated wastewater storage during maintenance / damage to the pipeline conveying wastewater to the deep sea.
17	Unit shall provide STP and ETP, RO with adequate capacity.	Complied. Adequate capacity of STP and ETP are available with 340 KLD and 1000 KLD resp.
18	The PP shall insure to dispose off waste water to common facilities having valid CTO of GPCB	The final treated effluent is discharged to GIDC common drain to deep sea.
19	The unit shall provide metering facility at the inlet and outlet of ETP & RO and maintain the records for the same	We have dedicated flow meters available for High COD and TDS effluent, Low COD and TDS effluent, UF and RO inlet and outlet. Records are maintained on daily basis. ETP Photographs with metering facility are attached as per Annexure - 13.
20	Proper logbooks of ETP, & RO; reuse/ recycle of treated/ untreated effluent; chemical consumption in effluent treatment; quantity & quality of treated effluent; power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time.	<p>Logbooks are available for ETP, RO & STP. The photograph of logbook is shown below.</p>  <p>CETP Plant Logbook</p>  <p>MEE Plant Logbook</p> <p>On monthly basis the treated effluent report is submitted to GPCB.</p>


																																
A3	AIR:																															
21	Unit shall not exceed fuel consumption for steam boiler, TFH, hot oil generator, Fluorspar drying system, and DG set as mentioned below	<p>The consumption of coal, HSD, FO/LSHS/LDO are well within the specified limit. The fuel consumption details are mentioned below.</p> <table border="1" data-bbox="789 932 1474 1192"> <thead> <tr> <th>Sr. No.</th> <th>Fuel</th> <th>Unit</th> <th>Permissible Limit</th> <th>Avg. consumption</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Coal</td> <td>MT/day</td> <td>1668</td> <td>892</td> </tr> <tr> <td>2</td> <td>HSD</td> <td>KL/day</td> <td>215</td> <td>8</td> </tr> <tr> <td>3</td> <td>FO</td> <td>KL/day</td> <td>142.5</td> <td>0</td> </tr> <tr> <td>4</td> <td>LSHS</td> <td>KL/day</td> <td>110</td> <td>51</td> </tr> <tr> <td>5</td> <td>Natural Gas</td> <td>NM3/day</td> <td>45000</td> <td>0</td> </tr> </tbody> </table>	Sr. No.	Fuel	Unit	Permissible Limit	Avg. consumption	1	Coal	MT/day	1668	892	2	HSD	KL/day	215	8	3	FO	KL/day	142.5	0	4	LSHS	KL/day	110	51	5	Natural Gas	NM3/day	45000	0
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22	Unit shall provide adequate APCM with flue gas generation sources to achieve the norms prescribed by GPCB	List of flue gas stacks with APCM are attached as per Annexure 19 as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.																														
23	Unit shall provide adequate APCM with process gas generation sources as mentioned below.	List of process gas stacks with APCM as on 30-Nov-22 are attached as per Annexure 19 as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.																														
24	<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 & health) following indicative guidelines shall also be followed to reduce the fugitive emission.</p> <ul style="list-style-type: none"> ➤ Internal roads shall be either concreted or asphalted or paved properly to reduce fugitive emission during vehicular movement. 	<p>The fugitive emission monitoring is carried out in work zone environment. The report of the is attached as per Annexure - 6.</p> <p>The photographs of emission control devices are attached as per Annexure – 20.</p> <p>Following Pollution Control System installed at site for controlling fugitive emission.</p> <ul style="list-style-type: none"> • Internal roads in factory premises are constructed with RCC to eliminate dusting during vehicle movement. • Coal is covered with tarpaulin during transportation. • Coal loading and unloading activity is being done in closed shed. 																														

	<ul style="list-style-type: none"> ➤ Air born dust shall be controlled with water sprinklers at suitable locations in the plant. ➤ A green belt shall develop all around the plant boundary and also along the roads to mitigate fugitive and transport dust emission. 	<ul style="list-style-type: none"> • Handling and transportation of coal is through covered coal conveyers • Dust collectors are installed to abate the nuisance of dust. • Installation of two Silo for fly ash storage. • Green belt of Total 11,81,776.35 sq. meter land area is available at site; Undertaking is submitted to develop green belt 4,23,866 sq.mt (35.87%) out of which 3,63,451 sq. mt. (30.8%) green belt already developed. • Out of which, 2,23,451 sq. mt. (19%) within premises + 1,40,000 sq.mt. (11.8%) at an adjacent alternative land given by GIDC. Remaining 60,415 sq.mt (5.1%) green belt will be developed by Mar-24. <p>Photographs of the same is attached as per Annexure - 1</p>
25	Regular monitoring of volatile organic compounds (VOCs) shall be carried out in the work zone area and ambient air.	VOC monitoring is being undertaken through an NABL accredited laboratory both in the work zone and ambient air. The report is attached as per Annexure-6
26	<p>For control of fugitive emission, VOCs following steps shall be followed:</p> <ol style="list-style-type: none"> a. Closed handling and charging system shall be provided for chemicals b. Reflux condenser shall be provided over reactors/vessels c. Pump shall be provided with mechanical seals to prevent leakages. d. Air born dust at all transfer operations / points shall be controlled either by spraying water or providing enclosures. 	<p>Following Pollution Control System installed at site for controlling fugitive emission.</p> <ol style="list-style-type: none"> a. Provided closed handling system for Hazardous Chemicals, condensers for collection of solvents. Mechanical seals are provided to pumps and reactors. Leak detection and repair test in pipeline and valve being done through pneumatic and hydraulic testing method. We are using VOC monitor for checking any leakage. Closed pipeline systems are used for transfer of solvents. Solvent traps with condensers are provided. At a moment, no underground storage tanks are installed. b. Reflux condenser is provided over reactors/Vessels. c. Double mechanical is used in Pump and Compressor. Regular preventive maintenance done of pumps, compressor, valves etc. d. Powder chemicals are charging in reactor through closed powder transferring system (PTS) to avoid spillage. Coal is covered with tarpaulin during transportation. Coal loading and unloading activity is being done in closed shed. Handling and transportation of coal is through covered coal conveyers Dust collectors are installed to abate the nuisance of dust. Installation of two Silo for fly ash storage.

		
27	<p>Solvent management shall be carried out as follows:</p> <ul style="list-style-type: none"> ➤ Measures shall be taken to reduce the process vapors as far as possible. Use of toxic solvent shall be minimum. All venting equipment have vapor recovery system ➤ Reactor shall be connected to adequate chilling system to condensate solvent vapors and reduce solvent losses ➤ Reactor and solvent handling pump shall have mechanical seals to prevent leakages. ➤ The condenser shall be provided with sufficient HTA and residence time so as to achieve maximum solvent 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 ➤ Solvent storage and handling area shall be flame proof. the solvent storage tanks shall be provided with breather valve to prevent losses. 	<ul style="list-style-type: none"> (vii) Reactors are connected to chilled brine condensers system. (viii) Mechanical seals are provided to prevent leakages. (ix) Solvent recovery for all solvent achieved more than 95% recovery by providing sufficient heat transfer area and residence time to the condensers. (x) Solvent storage separated with compliance of PESO guideline. <ul style="list-style-type: none"> - Dyke wall. - Nitrogen blanketing. - Flame Proof fittings - Required permissions and distances from adjacent building. - Fencing arrangement. - Controlled entries in solvent tanks (xi) Proper earthing as per Indian standard and PESO guidelines and IS 600079 have been provided. (xii) Entire plant is classified under hazardous area classification (IS5572) & provided flameproof equipment accordingly. The solvent storage tanks are provided with Nitrogen blanketing (PCV & PRV) & flame arrestor <p>The solvent storage tanks are provided with Nitrogen blanketing (PCV & PRV) & flame arrestor.</p>
28	<p>Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, HCl, Br2, NH3, Cl2, and VOCs shall be carried out in the impact zone and its records shall be maintained. Ambient 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>Ambient air quality monitoring is being undertaken on monthly basis by NABL accredited laboratory at four locations. No observations were by GPCB w.r.t. monitoring locations during their regular inspections. Perusal of the test reports related to ambient air quality monitoring reveal that all the monitored parameters (PM10, PM2.5, SO2, NOx, HCl, HF, NH3, Br2, Cl2 and VOCs) are well within the stipulated standards. The monitoring report is attached as per Annexure – 3</p>


A4	SOLID / HAZARDOUS WASTE:	
29	All the hazardous/ solid waste management shall be taken care as mentioned.	We are following the Hazardous waste and other wastes (Management & Handling) Rules, 2016.
30	Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.	<p>We are selling hazardous waste to authorized actual user or end users only. All the authorized actual/end users have applied/obtained permissions from concerned authorities under Rule 9 of the Hazardous and Other Waste Management and Transboundary Movement) Rules 2016.</p> <p>The few examples of MoU is shown below;</p> 
31	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.	Spent Solvent, Process Residue, Spent Catalyst, and Spent Catalyst disposal directly sent to cement industry for co-processing with compliance of Hazardous and Other Waste Management Rule 2016.
32	The project proponent has to obtain membership of TSDf site & CHWIF before obtaining CTO of GPCB	<p>Complied. Membership certificates are available with TSDf site, Pre-processing facility, cement industries and end users.</p> <p>copy of membership certificates are shown below;</p> 



		
33	STP sludge shall be collected and used as manure in gardening activity or send to TSDf site for landfilling.	STP sludge is sent to TSDf site along with chemical sludge of ETP.
34	Management of fly ash 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.	100% ash utilized by cement industries and brick manufacturing industries. Two silos are provided for fly ash storage. Last fly ash annual return is filled for FY 22-23 on 28/04/2023
35	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.	We are selling hazardous waste to authorized actual user or end users only. All the authorized actual/end users have applied/obtained permissions from concerned authorities under Rule 9 of the Hazardous and Other Waste Management and Transboundary Movement) Rules 2016.
A5	OTHER:	
36	The project proponent shall carry out the entire activities of amount of Rs. 312 lakhs [Solar Electrification of Schools, Primary Health Centers, Panchayat Buildings and Community Centers, Plantation of Neem Trees in common lands of villages and front and backyards of households, Cleaning and maintaining of the water ponds, Awareness creation on waste management, renewable energy, global warming among the children and youth) I proposed under CER shall be part of the Environment Management Plan (EMP) as per the MoEF&CC' s OM no. F. No. 22 65120'17-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 compliance report and to the District Collector. The monitoring report shall be posted on the website of the project proponent.	Noted and complied.




37	All the environmental protection measures and safe guards proposed in the form-1 & PFR submit by the project proponent and commitments made in their applications shall be strictly adhere to in letter and spirit.	Noted and complied.
B	<u>GENERAL CONDITIONS:</u>	
B1	<u>CONSTRUCTION PHASE:</u>	
38	Water demand during construction shall be reduced by use of curing agent, super plasticizers and other best construction practices	The construction/erection of Polytetrafluoroethylene plant work is in progress. Super Plasticizers are being used to reduce construction water requirement.
39	Project proponent shall ensure that surrounding environment shall not affect due to construction activities. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for control of fugitive emission.	The construction/erection of Polytetrafluoroethylene plant work is in progress. Construction activity is restricted to within the project premises and no impact on the surrounding environment outside the project area is anticipated. All such material carting is being done after water sprinkling.
40	All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintain through the construction phase	Major part of project is in operation. Required sanitary and hygienic requirement are fulfilled before starting the construction activity and maintained throughout.
41	First aid box shall be made readily available in adequate quantity at all the times	Adequate and well equipped first aid boxes are maintained at in various departments. We ensure periodical inspection of these boxes.
42	The project proponent shall be strictly comply with the building and other construction workers' (Regulation of employment and conditions of service) Act 1996 and Gujarat rules made their under and there subsequent amendments. Local by laws of concerned authority shall be complied in letter and spirit.	All construction activities and workers are started and deployed resp. only after conforming byelaws & rules. No show cause notices were issued by local authorities.
43	Ambient noise levels shall conform the residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.	Complied. The ambient noise levels are confirmed to the standards prescribed under the Environment (P) Rules, 1939 viz. 75 (dBA (day time) and 70 dBA (night time) and monitoring of ambient noise is done by M/S. BEIL Infrastructure Limited- Ankleshwar. (Recognized NABL Laboratories no. NABL/TC-8141 dated 07/11/2021 and valid up to 06/11/2023) Detailed analysis of monitoring results is attached as Annexure-9
44	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.	We are using captive power for our construction work. In case of DG set use, we are complying to EPA norms of air and noise. DG sets are provided with acoustic enclosures. Air and Noise level monitoring is carried out on monthly basis and results are well within permissible limits.

45	Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.	The municipal solid waste generated at the end of contractor is managed by giving emphasis to prevention, reduction, reuse, recycling, recovery. The municipal solid waste like Soil, Sand, gravel, brick, concrete, masonry are used for filling low lying areas whereas metal, wood, plastic wastes are sold to recyclers.
46	All topsoil excavated during construction activity shall be used in horticultural / landscape development within the project site.	The excavated soil during construction activity will be used for horticulture/landscape development within premises.
47	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 of 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 neighboring communities.	The excavated soil during construction activity will be used for horticulture/landscape development within premises. We are using excavated soil for building plinth filling & filling in low lying areas within our premises and not sending anything outside.
48	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.	Fly ash is used in the backfilling required for road construction. We are encouraging usage of RMC & fly ash paver blocks for new construction.
49	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	For construction activity, wherever possible, we will use fly ash brick.
50	"Wind - breaker of appropriate height i.e. 1/3rd of the building height and maximum up to 10 meters shall be provided. individual building within the project site shall also be provided with barricades.	Noted and being complied
51	"No uncovered vehicles carrying construction material and waste shall be permitted."	All the internal movement of construction material is being done after water sprinkling
52	"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."	All sand storages are properly maintained with frequent water sprinkling. No soil is being stored on site
53	Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads).	We have the pucca road for vehicle movement inside the plant.

54	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	All the excavation started only after identified place of captive consumptions available to discourage stacking of soil
55	Dust mitigation measures displayed prominently at the construction site for easy public viewing	Display Board showing dust mitigation measures is placed at construction site as shown below; 
56	Grinding and cutting of building materials in open areas shall be prohibited	Grinding & cutting is done at defined place identified for such activities at contractor fabrication area
57	Construction material and waste should be stored within earmarked area and within road side storage of construction materials and waste shall be prohibited	All construction material is stored near to construction area at predefined & marked location. No construction waste is stacked on site
58	Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures be notified at the site. (if applicable)	Construction or Demolition waste is being used for filling low lying areas within premises with proper rolling and compaction.
B2 B2.1	OPERATION PHASE WATER:	
59	Water meter shall be installed and records of daily and monthly water consumption shall be maintained.	Separate water meter installed in inlet of water receipt from GIDC, and daily and monthly water consumption maintained. Daily records are maintained in logbooks.
60	All effort shall be made to optimize water consumption by exploring best available technology (BTA). The unit shall continuously strive to reduce, recycle and reuse the treated effluent.	In last six months from Dec-22 to May-23, average 3384 KLD RO permeate is recycled & reused in cooling tower makeup.
B2.2 AIR:		
61	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	Not applicable as spray dryer are not used in process/operations.

	shall be submitted to GPCB every year along with half yearly compliance report.																																																																										
62	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	To control noise level, we have provided acoustic enclosures in all 7 DG sets. The DG set capacity are 2 x 500 KW, 2 x 840, 3 x 4200 KVA were provided with acoustic enclosures and stack of height 11 meter and 30-meter resp. Air & Noise level monitoring are monthly carried out by NABL accredited laboratory.																																																																									
63	Stacks/vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/Process gas emission.	<p>We have provided adequate stack height as per the prevailing norms for flue gas emissions of GPCB/CPCB and MOEFCC.</p> <table border="1"> <thead> <tr> <th>Stack No.</th> <th>Stack Attached To</th> <th>Stack Height in Meter</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Boiler 17 TPH</td> <td>53</td> </tr> <tr> <td>2</td> <td>Boiler 35 TPH</td> <td rowspan="3">94 (Common Stack)</td> </tr> <tr> <td>3</td> <td>Boiler 35 TPH</td> </tr> <tr> <td>4</td> <td>Boiler 60 TPH</td> </tr> <tr> <td>5</td> <td>DG Set 500 KW (600 KVA)</td> <td>11</td> </tr> <tr> <td>6</td> <td>DG Set 500 KW (600 KVA)</td> <td>11</td> </tr> <tr> <td>7</td> <td>DG Set 840 KW (1010 KVA)</td> <td>30</td> </tr> <tr> <td>8</td> <td>DG Set 840 KW (1010 KVA)</td> <td>30</td> </tr> <tr> <td>9</td> <td>TCE/PCE Plant Thermic Fluid Heaters No. 1</td> <td>50</td> </tr> <tr> <td>10</td> <td>TCE/PCE Plant Thermic Fluid Heaters No. 2</td> <td>50</td> </tr> <tr> <td>11</td> <td>HFC 134a Plant Thermic Fluid Heaters</td> <td>50</td> </tr> <tr> <td>12</td> <td>AHF Plant Heater No. 1 (Thermic Fluid Heaters)</td> <td>46</td> </tr> <tr> <td>13</td> <td>AHF Plant Drying System No. 1</td> <td>35</td> </tr> <tr> <td>14</td> <td>AHF Plant Heaters No. 2 (Thermic Fluid Heater)</td> <td>46</td> </tr> <tr> <td>15</td> <td>AHF Plant Drying System No. 2</td> <td>35</td> </tr> <tr> <td>16</td> <td>Difluoromethan (HFC 32) Plant Hot Oil Furnace (Thermic Fluid Heater)</td> <td>55</td> </tr> <tr> <td>17</td> <td>Boiler 30 TPH</td> <td>63</td> </tr> <tr> <td>18</td> <td>Boiler 30 TPH</td> <td>63</td> </tr> <tr> <td>19</td> <td>DG Sets 4200 KVA</td> <td>30</td> </tr> <tr> <td>20</td> <td>DG Sets 4200 KVA</td> <td>30</td> </tr> <tr> <td>21</td> <td>DG Sets 4200 KVA</td> <td>30</td> </tr> <tr> <td>22</td> <td>Dust Collector</td> <td>11</td> </tr> <tr> <td>23</td> <td>Boiler 175 TPH</td> <td>110</td> </tr> <tr> <td>24</td> <td>Thermal Oxidizer -1</td> <td>40</td> </tr> </tbody> </table>	Stack No.	Stack Attached To	Stack Height in Meter	1	Boiler 17 TPH	53	2	Boiler 35 TPH	94 (Common Stack)	3	Boiler 35 TPH	4	Boiler 60 TPH	5	DG Set 500 KW (600 KVA)	11	6	DG Set 500 KW (600 KVA)	11	7	DG Set 840 KW (1010 KVA)	30	8	DG Set 840 KW (1010 KVA)	30	9	TCE/PCE Plant Thermic Fluid Heaters No. 1	50	10	TCE/PCE Plant Thermic Fluid Heaters No. 2	50	11	HFC 134a Plant Thermic Fluid Heaters	50	12	AHF Plant Heater No. 1 (Thermic Fluid Heaters)	46	13	AHF Plant Drying System No. 1	35	14	AHF Plant Heaters No. 2 (Thermic Fluid Heater)	46	15	AHF Plant Drying System No. 2	35	16	Difluoromethan (HFC 32) Plant Hot Oil Furnace (Thermic Fluid Heater)	55	17	Boiler 30 TPH	63	18	Boiler 30 TPH	63	19	DG Sets 4200 KVA	30	20	DG Sets 4200 KVA	30	21	DG Sets 4200 KVA	30	22	Dust Collector	11	23	Boiler 175 TPH	110	24	Thermal Oxidizer -1	40
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64	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.	Monthly monitoring is carried out for Flue gas and process gas emission. The monitoring report is attached as per Annexure - 21 .
65	All the reactors / vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	All ingredient feed to reactor/vessel are in close feed system like Pipeline, Powder transferring system.
B2.3 HAZARDOUS/SOLID WASTE		
66	The company shall strictly comply with the rules and regulations with regards to handling and disposal of hazardous waste in accordance with the hazardous and other waste (management and transboundary movement) rules 2016 as may be amended time to time. Authorization from GPCB shall be obtained for the collection/treatment/storage/disposal of hazardous waste	<p>Hazardous waste is stored in secured storage areas with impervious flooring and shed to eliminate chances of contamination of land and water. All necessary precautions are taken during management and handling of hazardous wastes. We have obtained authorization for Hazardous and Other Waste (Management and Transboundary Movement) Rule 2016 from Gujarat Pollution Control Board vide letter No. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022. Details are attached as Annexure – 22</p> <p>We are having membership of TSDF of M/s. Recycling Solutions Pvt. Ltd., M/s. BEIL, M/s. SEPL and Common Incineration facility of M/s SEPPL, Kutch for disposal of hazardous waste.</p> <p>During transportation of hazardous waste following procedure is being adopted: Labelling of hazardous waste is done as per Form-8. Relevant information is provided to transporter in Form-9. Online manifest is being prepared through GPCB XGN site before sending the hazardous waste. Hazardous waste record is being updated on GPCB XGN site on monthly basis.</p>
67	Hazardous waste shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility before its disposal.	Hazardous waste is stored in secured dedicated storage areas with impervious flooring and shed to eliminate chances of contamination of land and water. The leachate is collected and treated in ETP.

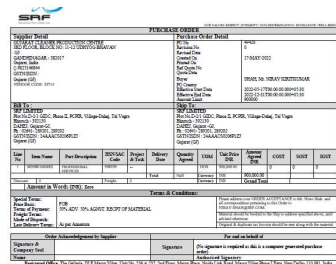
68	The unit shall obtain necessary permission from the nearby TSDf site and CHWIF. (Whichever is applicable)	<p>Necessary permission obtained from nearby TSDf site and CHWIF, copy of membership certificates are shown below;</p> <div style="display: flex; justify-content: space-around;">   </div> 
69	Trucks/tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, '1988, and rules made there under.	All the trucks/tankers used for hazardous waste are complying to Motor vehicle act.
70	The design of the Trucks/tankers shall be such that there is no spillage during transportation.	We are ensuring the good condition of trucks/tankers are being used for hazardous waste handling.
71	All possible efforts shall be made for the co-processing of the hazardous waste prior to dispose in to TDF/CHWIF.	Spent Solvent, Process Residue, Spent Catalyst, and Spent Catalyst disposal directly send cement industry for co-processing with compliance of Hazardous and Other Waste Management Rule 2016. Spent solvents and Process residue are sent to cement industry namely JK Lakshmi cement, Shree cement, Ambuja cement, Ultratech cement.
72	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.	100% ash utilized by cement industries and brick manufacturing industries. Two silos are provided for fly ash storage. Last fly ash annual return is filled for FY 22-23 on 28/04/2023.
B2.4	SAFETY:	




73	The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963	We SRF limited are strictly complying the rules and guidelines under Factories Act 1948 and the Gujarat Factories Rule 1963.																
74	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.	<p>We SRF limited are strictly complying the rules and guidelines under Manufacture, Storage, and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time and all transportation of Hazardous Chemicals are as per the Motor Vehicle Act (MVA), 1989. Haz chemical storage, handling and control details are attached as per Annexure - 14.</p> <ul style="list-style-type: none"> Public Liability Insurance is available and copy of the same is attached as per Annexure 23. Hazardous chemicals storage approval is obtained, and details is attached as per Annexure – 9. On site emergency plan is available and reviewed on yearly basis. The content of the same is attached as per Annexure - 04. 																
75	Main entry and exit shall be separate and clearly marked in the facility.	Main entry and exit are separate and clearly marked in the facility.																
76	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/emergency vehicle around the premises	Adequate wide roads are provided for free movement of fire tender/emergency vehicles.																
77	Storage of flammable chemicals shall be sufficiently away from the production area.	Hazardous chemicals are stored in designated tanks. Tank, drums, carboys etc. stored as per chemical compatibility, material of constructions and PESO guideline.																
78	Sufficient number of fire extinguisher shall be provided near the plant and storage area.	<p>Total 2490 nos. of fire extinguishers are available in the plant.</p> <table border="1" data-bbox="787 1270 1507 1543"> <thead> <tr> <th colspan="2">Fire Extinguisher</th> </tr> <tr> <th>Type</th> <th>Qty (in nos.)</th> </tr> </thead> <tbody> <tr> <td>ABC Type</td> <td>1046</td> </tr> <tr> <td>DCP Type</td> <td>434</td> </tr> <tr> <td>CO2 Type</td> <td>511</td> </tr> <tr> <td>MF Type</td> <td>495</td> </tr> <tr> <td>Fire Ext -K-Type</td> <td>04</td> </tr> <tr> <td>Total</td> <td>2490</td> </tr> </tbody> </table>	Fire Extinguisher		Type	Qty (in nos.)	ABC Type	1046	DCP Type	434	CO2 Type	511	MF Type	495	Fire Ext -K-Type	04	Total	2490
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79	All the necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals.	Safe operating procedures prepared for storage and handling of hazardous & toxic chemicals. To avoid accidents during handling all required controls like temperature indication, level indicators are provided.																
80	All the toxic / hazardous chemicals stored in a optimum quantity and all necessary permissions in this regard shall be obtain before commencing the expansion activities.	Storage of toxic/hazardous chemicals is being done at optimum level, necessary permissions of the same obtained before taking facilities in use.																

81	The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safe guards mentioned in the risk assessment report.	As recommended in risk assessment, environment protection measures and risk mitigation measures have been considered in design stage.
82	Only flame proof electrical fitting shall be provided in plant premises	Flame proof electrical fittings provided in the plant premises.
83	Storage of hazardous chemicals shall ne minimize and it shall be in multiple small capacity tank / containers instead of one single large capacity tank / containers.	We have dedicated storage tanks for required capacity. Hazardous chemicals, storage and control detail is attached as per Annexure – 14 .
84	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.	Practice of periodic thickness testing of tanks is in practice to know wear & tear, corrosion etc. Pressure vessels (storage tanks) are being tested periodically as per GFR and PESO guidelines for early detection of wear & tear. LEL sensors and toxic gas sensors are also provided to detect leakages. Storage tanks are fitted with high-level indicators to avoid overflow. Proper dyke and bunds are provided around transfer pump area. Tanks are provided with dyke walls. Corrosive pipelines and tested periodically.
85	Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.	Handling and charging of the chemicals done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.
86	Tie up shall be done with nearby health care unit / doctor for seeking immediate medical attention in the case of emer9ency.	We have tie up with healing touch Hospital, Baroda Heart Hospital, Apex Hospital, I-Q Hospital at Bharuch and Bhailal Amin General Hospital, Sterling Hospital, BAPS Hospital, Tricolor Hospital at Vadodara for immediate medical attention in the case of emergency.
87	Personal Protective Equipments (PPEs) shall be provided to workers and its usage shall be ensured and supervised.	All necessary PPEs is providing to workers
88	First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	Trained First aiders are identified from individual plants and Antidotes are also available in occupational health center. Detail of Antidotes is attached as per Annexure - 24 .
89	Training shall be imparted to all the workers on safety and health aspects of chemicals handling	Periodic safety training is imparted to workers/employees. Recent training summary with photograph is attached as per Annexure – 7 Safety and Health aspects for chemical handling. Our training center is approved by Gujarat State government under Rule- 111A. We have dedicated manpower & facility for imparting training on EHS aspects.
90	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.	The health surveillance is carried out for all the employees. The sample records are as per Annexure-25 ;

91	Transportation of hazardous chemicals shall be done as per the factories acts & rules.	<p>We SRF limited are strictly complying the rules and guidelines under Manufacture, Storage, and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time and all transportation of Hazardous Chemicals are as per the Motor Vehicle Act (MVA), 1989.</p> <p>Applicable provisions of MSIHC rules are.</p> <ul style="list-style-type: none"> • Audit • Onsite emergency plan • Reporting of Major accident • Safety audits • Labelling of vehicles <p>All vehicles are with GPS System for hazardous Waste transportation.</p>
92	The company shall implement all preventive and mitigation measures suggested in the risk assessment report.	<p>We have identified requirements under Manufacture, storage & Import of Hazardous Chemicals Rules, 1986 & the factories Act, 1948. Compliance of these requirements are monitored in register of regulation to keep system in compliant state.</p> <ul style="list-style-type: none"> • Quantitative risk assessment is carried out by third party and the content of the same is attached as per Annexure – 26. • We have installed Fire hydrant system as per GFR 66 A norms. • Process hazard analysis and HAZOP study is conducted for each process and recommendations are implemented. • We have implemented HSE management system as per CCPS guidelines. • We have implemented Induction course for HSE at very initial stage employees' recruitment. • We are conducting Periodic On-Site Emergency Mock Drills to maintain preparedness levels of employees to tackle any emergency. • We are maintaining Emergency handling facilities in operational condition at all time to avoid failures. • We have prepared Safe operating procedure for hazardous process and material handling process. -We have provided Smoke detectors and sprinkler system in go down/warehouse, drum storage area etc. • We calibrate Safety devices and control instruments once in a year. • Proper color work as per IS 2379 of plant, pipeline, tank, equipment is being maintained to protect assets from corrosion • We have prepared Preventive maintenance schedule for all critical equipment's. • We have implemented Permit to work system for hazardous work in the plant. • We have prepared and distributed Safety manual as per Gujarat Factories Rule-68 K & P and Public awareness manual as per Gujarat Factories Rule 41 B & C to all employees and nearby public

		<ul style="list-style-type: none"> We have extended Fire & Safety organization setup to implement better plant process safety. <p>Plant process safety recommendations provided in relevant section of the report should be complied at plant commissioning stage.</p>
93	Necessary permissions from various statutory authorities like PESO, factory inspectorate and others shall be prior to commissioning of the project	We have obtained the PESO permission for the storage and handling of hazardous chemicals. The list of PESO permissions is attached as per Annexure - 9.
B2.5	<u>NOISE:</u>	
94	The overall noise level in and around the plant area shall be kept well within the statutory standards by providing noise control measures including engineering control like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall conform to the standards prescribed under the environmental protection act 1986 & rules	<ul style="list-style-type: none"> To control noise level, we have provided acoustic enclosures in all four DG sets, segregation of utility areas. Based on noise level sitting arrangements have been done in separate areas to minimize personal exposure. To minimize noise pollution vibrating pads, low noise making machineries have been provided. Ambient noise monitoring level is being checked on monthly basis to check efficiency of controls. The personal protective equipment (PPE) is provided to workers & employees working in noisy areas.
B2.6	<u>GENERAL PRODUCTION AND WASTE MINIMIZATION:</u>	
95	The unit shall undertake the cleaner production assessment study through a reputed institute / organization and shall form CP Team in company. The recommendation there of along with the compliance shall be furnished to the GPCB.	<p>The study is completed by Gujarat Cleaner Production Centre. Below is the PO copy of the same. We are awaiting the final report.</p> 
96	<p>the company shall undertake various waste minimization measures such as</p> <ol style="list-style-type: none"> Metering and control of quantities of active ingredients to minimize the waste Reuse of byproduct from the process as raw material substituents Use of automated and close filling to minimize the spillage Use of closed feed systems into batch reactors Venting equipment through vapor recovery system Use of high-pressure hoses for cleaning to reduce wastewater generation. 	<p>Waste minimization measures taken as follow;</p> <ul style="list-style-type: none"> We have installed flow meters, load cell & Level transmitter for metering & control of active ingredient Re-use by-products as raw material like NH3 solution, 30% HCl, Hypo, wherever applicable and rest part sale. All filling machine are provided with automated filling facility to avoid spillage. All ingredient feed to reactor in close feed system like Pipeline, Powder transferring system. Vent pipes are provided to reduce wastewater generation Using high pressure jet machine & spray ball for cleaning to reduce wastewater generation

	<p>g. Recycling of washes to subsequent batches.</p> <p>h. Recycling of steam condensate</p> <p>i. Sweeping/mopping of floor instead of floor washing to avoid effluent generation</p> <p>j. Regular preventive maintenance for avoiding leakage, spillage etc.</p>	 <ul style="list-style-type: none"> • Washes water is recycled and subsequently reused. • Steam condensate is collected separately and treated in ETP /RO & RO permeate is recycled to cooling tower makeup
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B2.7 GREENBELT AND OTHER PLANTATION:

97	<p>The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, unit shall take up adequate plantation at road sides and suitable open areas in GIDC ester 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</p>	<p>Total 11,81,776.35 sq. meter land area is available at site; Undertaking is submitted to develop green belt 4,23,866 sq.mt (35.87%) out of which 3,63,451 sq. mt. (30.8%) green belt already developed.</p> <p>Out of which, 2,23,451 sq. mt. (19%) within premises + 1,40,000 sq.mt. (11.8%) at an adjacent alternative land given by GIDC. Remaining 60,415 sq.mt (5.1%) green belt will be developed by Mar-24.</p> <p>Photographs of the same is attached as per Annexure - 1</p>
98	<p>Drip irrigation/ low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.</p>	<p>We are using Drip irrigation / low-volume, low-angle sprinkler system for the green belt development within the premises.</p>
99	<p>The PP shall develop the green belt [423451 sq.mt. (35.83%) = (223451 sq.mt. (19%) develop within premises and 200415 sq.mt. (16.83%) green belt area will be developed in an alternative land given by GIDC). i.e. 35.83% of 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 3years of operation phase in consultation with GPCB.</p>	<p>Total 11,81,776.35 sq. meter land area is available at site; Undertaking is submitted to develop green belt 4,23,866 sq.mt (35.87%) out of which 3,63,451 sq. mt. (30.8%) green belt already developed.</p> <p>Out of which, 2,23,451 sq. mt. (19%) within premises + 1,40,000 sq.mt. (11.8%) at an adjacent alternative land given by GIDC. Remaining 60,415 sq.mt (5.1%) green belt will be developed by Mar-24.</p> <p>Photographs of the same is attached as per Annexure - 1</p>

B3	<u>OTHER CONDITIONS:</u>	
100	The project covered under category 5(f) shall undergo safety and environment audit regularly as per the standards laid down by the GPCB and CPCB.	Yearly safety and environment audit is carried out by authorized party and resp. reports are submitted to DISH and GPCB.
101	PP shall carry out the safety audit and risk assessment report as per the prevailing guidelines of safety	Complied. Risk assessment report and safety audit is carried out.
102	Management of fly Ash shall be as per the fly ash notification 2009 & its amendment from time to time and it shall be insured that there will be 100% utilization of fly ash to be generated from the unit.	100% ash utilized by cement industries and brick manufacturing industries. Two silos are provided for fly ash storage. Last fly ash annual return is filled for FY 22-23 on 28/04/2023.
103	EMP should invariably include provisions for environmental monitoring and measures for noise pollution control measures	Monthly environmental monitoring is carried out for air, water, noise, ground water. Monthly reports are submitted to GPCB before 10 th of every month.
104	In EMP proponent should separately indicate majors of occupational health, safety and fire measures.	Complied. Effective measures are available for occupational health and safety.
105	Prior EC is granted is subject to the proponent receiving all statutory permission / clearances / certificates and membership of respective agencies / authorities which ever applicable. Proponent shall Inform progress from time to time, in six monthly complain@ report to MOEFCC / SEIAA / SEAC/ GPCB failing to which this provisional EC will stand withdrawn.	Complied.
106	Wherever waste water or chemical water to be collected by tankers and transported to CETP etc. any diversion and disposal in open drainage (nallah) etc. causing human and environmental damage or loss will make it liable for action under the law.	Not Applicable.
107	All transport movement by tankers etc. has to be done with maintenance of gate pass and logbook it should be verified by the inspecting authorities.	Not Applicable.
108	Non-hazardous waste data shall be informed to GPCB time to time so as to make an assessment and tie-up with industry for generating sustainable power from the waste,	Nonhazardous waste data are submitted to GPCB on yearly basis.
109	All chemical pharma industry etc. should ensure predictive and preventive maintenance of factory / boiler and reactive show as to avoid incident of fire and safety hazards.	We have prepared Preventive maintenance schedule for all critical equipment's.

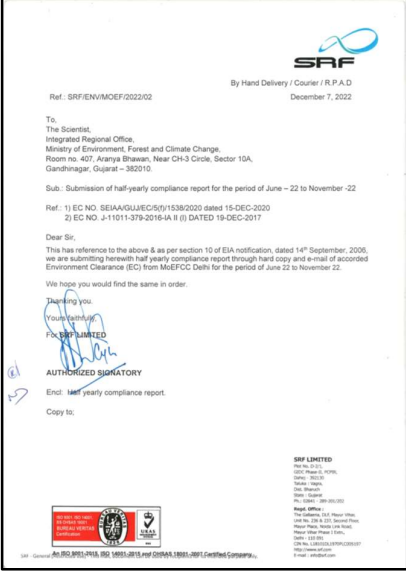
110	EMP should include STP and detail cost including maintenance, transportation of waste water to CETP / CMEE etc. as well as transportation cost or transit cost.	Complied. STP of 340 KLD is in operational.																																																																																																				
111	In LDAR preventive and predictive maintenance plan.	We have our preventive maintenance program for leak identification and repairing in place as per preventive maintenance schedules for all plants on defined frequency & implemented as per CPCB guidelines. Details of Logbook of LEL/Gas detector list is attached as per Annexure - 7 .																																																																																																				
112	In LDAR leakage component, source of equipment leak, detention method should be given in table form.	We have our preventive maintenance program for leak identification and repairing in place as per preventive maintenance schedules for all plants on defined frequency & implemented as per CPCB guidelines. Details of Logbook of LEL/Gas detector list is attached as per Annexure - 7																																																																																																				
113	In storage component should be shown separately in terms whether inflammable, toxic, corrosive, reactive etc.	The hazardous raw material in Raw material and Finished Goods area are stored as per compatibility of material. <table border="1" data-bbox="787 720 1414 1140"> <caption>General recommendations for the separation or segregation of different classes of dangerous substances</caption> <thead> <tr> <th>Class</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> </tr> </thead> <tbody> <tr> <td>1 Compressed Gases</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2.1 Flammable</td> <td>2.1</td> <td>2.2</td> <td>2.3</td> <td>2.4</td> <td>2.5</td> <td>2.6</td> <td>2.7</td> <td>2.8</td> <td>2.9</td> </tr> <tr> <td>2.2 Non-Flammable / Non-Toxic</td> <td>2.1</td> <td>2.2</td> <td>2.3</td> <td>2.4</td> <td>2.5</td> <td>2.6</td> <td>2.7</td> <td>2.8</td> <td>2.9</td> </tr> <tr> <td>2.3 Toxic</td> <td>2.1</td> <td>2.2</td> <td>2.3</td> <td>2.4</td> <td>2.5</td> <td>2.6</td> <td>2.7</td> <td>2.8</td> <td>2.9</td> </tr> <tr> <td>3 Flammable Liquids</td> <td>3.1</td> <td>3.2</td> <td>3.3</td> <td>3.4</td> <td>3.5</td> <td>3.6</td> <td>3.7</td> <td>3.8</td> <td>3.9</td> </tr> <tr> <td>4 Flammable Solids</td> <td>4.1</td> <td>4.2</td> <td>4.3</td> <td>4.4</td> <td>4.5</td> <td>4.6</td> <td>4.7</td> <td>4.8</td> <td>4.9</td> </tr> <tr> <td>5 Oxidizing Substances</td> <td>5.1</td> <td>5.2</td> <td>5.3</td> <td>5.4</td> <td>5.5</td> <td>5.6</td> <td>5.7</td> <td>5.8</td> <td>5.9</td> </tr> <tr> <td>6 Toxic Substances</td> <td>6.1</td> <td>6.2</td> <td>6.3</td> <td>6.4</td> <td>6.5</td> <td>6.6</td> <td>6.7</td> <td>6.8</td> <td>6.9</td> </tr> <tr> <td>8 Corrosive Substances</td> <td>8.1</td> <td>8.2</td> <td>8.3</td> <td>8.4</td> <td>8.5</td> <td>8.6</td> <td>8.7</td> <td>8.8</td> <td>8.9</td> </tr> </tbody> </table>	Class	1	2	3	4	5	6	7	8	9	1 Compressed Gases										2.1 Flammable	2.1	2.2	2.3	2.4	2.5	2.6	2.7	2.8	2.9	2.2 Non-Flammable / Non-Toxic	2.1	2.2	2.3	2.4	2.5	2.6	2.7	2.8	2.9	2.3 Toxic	2.1	2.2	2.3	2.4	2.5	2.6	2.7	2.8	2.9	3 Flammable Liquids	3.1	3.2	3.3	3.4	3.5	3.6	3.7	3.8	3.9	4 Flammable Solids	4.1	4.2	4.3	4.4	4.5	4.6	4.7	4.8	4.9	5 Oxidizing Substances	5.1	5.2	5.3	5.4	5.5	5.6	5.7	5.8	5.9	6 Toxic Substances	6.1	6.2	6.3	6.4	6.5	6.6	6.7	6.8	6.9	8 Corrosive Substances	8.1	8.2	8.3	8.4	8.5	8.6	8.7	8.8	8.9
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115	The project proponent shall comply and abide with the undertaking submitted that the proposed project falls in Synthetic Organic Chemical (API & Its intermediates) i.e. category 5(f)-B2.	Complied.																																																																																																				
116	Project proponent shall install all environment management system as per the GPCB/CPCB directives regarding the effluent discharge and air emission in working condition	Complied. The unit is having ISO 14001:2015 IMS certificate.																																																																																																				
117	Project proponent shall display the copy of environment clearance at the site prominently	Noted.																																																																																																				
118	Project proponent shall prepare and follow regular and preventive maintenance plan. The copy of the same shall be submitted to SIEAA	The environment audit reports comprises of monitoring results is submitted to GPCB before 30 th June.																																																																																																				

119	Project proponent will have to display the safety procedures in working area.	General safety instruction, piping colour code, PPE donning and doffing, Chemical compatibility matrix, Emergency evacuation plan, Emergency communications, MSDS etc. are displayed at conspicuous places.
120	The project proponent shall obtain all required permissions for safety, health and fire from component authorities like PESO/fire authorities etc. and intimate SEIAA.	Complied. Necessary permissions from DISH, PESO, Prohibition are obtained.
121	Project proponent shall intimate SIEAA/SEAC/GPCB after obtaining the membership of common facilities like CETP/TSD/CHWIF/CMEE/common spray dryer as the case may be.	The membership certificate along with environment audit report is submitted to GPCB before 30 th June of every year.
122	Extra care be shall be taken by PP to avoid any accidental blast in boiler, reactor or any machinery in the plant.	Approval is taken from boiler inspector and it is getting renewed periodically.
123	Environment monitoring, training and disaster management plan should be undertaken and complied at regular interval.	Complied.
124	Integrated regional office at MoEF & CC, Gandhinagar and GPCB will monitor all environment, safety and health norms as per the prevailing rules.	Noted.
125	The PP has to maintain the log sheets/ registers/ manifest/ gate pass for discharge through tankers and SCADA system for pipeline discharge for the waste water generation and its disposal data and submit to the GPCB every quarter. GPCB shall be verify the same on regular basis and inform SEIAA and take legal actions in cases of non-compliance.	Complied. The logbook are maintained.
126	Unit shall comply all the applicable standard conditions prescribed in office memorandum published by MoEF & CC vide no. F. no. 22-34/2018-IA.III dated 09/08/2018 for pharmaceuticals and chemical industries mentioned at (Sr. No. XX)	Noted and complied.
127	The provisions of the solid waste management rules,2016, E-waste management rules 2016, construction and demolition waste management rules 2016 and the plastic waste management rules shall be followed.	Complied. Importer registration under PWM 2022 is obtained.
128	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-	The rooftop rainwater transfers through storm water drain to storm water collection sump. We have arrangement of rainwater transferred from 50 KL collection tank to Utility RO for re-using in cooling tower.

	treatment must be done to remove suspended matters (Applicable to unit consuming ground water > 50 KLD in line with the prevailing guidelines of SPCB)	Roof top rainwater collection system is installed in RGFS roof to collect approx. 2142 KL water and re-use in cooling tower make up.
129	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.	We have joined and participated financially and technically Dahej Industrial Association, Dahej
130	Application of solar energy shall be incorporated for illumination of common areas, lighting of gardens and street lighting in addition the provision for solar water heating system shall also be provided.	We have signed the Power purchase agreement with Cleanmax Bhoomi Pvt Ltd. to generate the electricity through renewal power – Wind Solar Hybrid Power plants and Wind Power plants. The renewal power (hybrid – solar/wind) with 2 MW is started from 19-Nov-22. 
131	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose	Total 11,81,776.35 sq. meter land area is available at site; Undertaking is submitted to develop green belt 4,23,866 sq.mt (35.87%) out of which 3,63,451 sq. mt. (30.8%) green belt already developed. Out of which, 2,23,451 sq. mt. (19%) within premises + 1,40,000 sq.mt. (11.8%) at an adjacent alternative land given by GIDC. Remaining 60,415 sq.mt (5.1%) green belt will be developed by Mar-24. Photographs of the same is attached as per Annexure - 1
132	All the commitments/ undertakings given to the SEAC during the appraisal process of environment protection and management strictly adhere to.	We are complying to adhere all the commitments/undertakings given to SEAC during the appraisal process for the purpose of environment protection and management.
133	The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other component authority for the purpose for the environmental protection and management.	Not applicable.

134	In the event of the failure of the any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.	Agreed. We will safely close our unit if failure of any pollution control system adopted by the unit and will not restart until the desired efficiency of the control equipment will be achieve. We have developed safe shutdown procedures that shall ensure safety of plant and environment.
135	The project authorities must strictly adhere to the stipulation made by the Gujarat pollution control board (GPCB) state government and any statutory authority.	We are adhering to requirement made by GPCB and other statutory authority as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.
136	During material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic waste water and storm water.	All material transfers are through closed pipelines and dedicated transferring systems. To avoid mixing of accidental spillage of chemicals process plants have been provided with separate drains like – process effluent collection with pump arrangement. Plant washings gets collected in wash pits. Steam condensate pits are also separate from plant effluents. Storm water drains and not connected in plant drains hence storm water will never get contaminated with process effluent.
137	Pucca flooring/ impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	Work areas, chemical storage areas and chemical handling areas have pucca flooring with impervious flooring. All such floorings have containment provision to collect accidental spillage at one place and to avoid soil contamination.
138	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.	To contain leaks from pumps, pipelines & tanks we have provided adequate containment provisions in the form of garland curb walls, dykes and dedicated pits with transfer arrangements. In addition to above leak in open area will be contained and managed by high capacity spill kits.
139	No further expansion and modification in the plant likely to cause environmental impacts shall be carried out without obtaining prior environmental clearance from the concerned authority.	Expansions will be done after taking permissions from MOEFCC/SEIAA.
140	The above conditions will be enforced, inter- alia under the provision of the water (Prevention and control of pollution) Act ,1974, Air (Prevention and control of pollution) Act ,1981 the environment protection act 1986, Hazardous waste (Management, handling and transboundary movement) rule 2008 and the public liability insurance act 1991 along with their amendments and rules.	Noted. we are adhering conditions in letter and spirit.
141	The project proponent comply with all the conditions mentioned in the companies (Corporate social responsibility policy) Rules 2014 and its amendments form time to time in a letter and spirit.	We have spent around INR 43 crores towards infrastructure development, rural education program, sanitation, swachta kit, drinking water facilities in last three years. In FY 21-22 (Apr 2021 to Mar 2022), we have spent INR 486 Lakhs in surrounding villages nearer Dahej plant. The CSR activity details are attached as per Annexure 10 .

142	<p>The project management shall insure that unit companies with all the environmental protection measures, risk mitigation measures and safeguards recommended in the EMP report and risk assessment study report as well as proposed by project proponent</p>	<p>SRF Limited is complying following recommendation made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing.</p> <ul style="list-style-type: none"> • Established wastewater treatment facility and online monitoring equipment. • Provided continuous emission monitoring system for flue gas. • Provided gas detectors in Raw Material storage area. • All necessary PPEs is providing to workers. 5. Provided Hazardous Waste Storage Facility separately. • Developed 30 – 50 m width greenbelt to factory periphery. • Environmental Laboratory established for Wastewater analysis and monitoring. • Environmental Monitoring is being done on regular basis by NABL and MoEF approved laboratory. • Fugitive emission and Workplace monitoring is being done on regularly basis. • Separate environmental monitoring cell. • Allocated earmarked capital and operation budget for environmental activity. • CSR fund allocated for socio economic development. • HSE management system is implemented. • Process hazard analysis and HAZOP study is being conducted for each process. <p>Periodic on-Site Emergency Mock Drills is being conducted, so those staffs are trained and are in a state of preparedness to tackle any emergency.</p>
143	<p>The project authority 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 here in. the funds so provided shall not be diverted for any other purpose.</p>	<p>Various safeguards like MEE, ETP, scrubbers, stacks etc. are installed for which financial allocations has made under CAPEX and OPEX.</p> <p>Company has spent INR 4.42 crore toward capital investment in ETP & INR 80+ crores in operation. This includes the cost of ETP/MEE/RO operation and waste disposal charges. New Utility UF/RO plant is commissioned in Aug-22.</p>
144	<p>The applicant shall inform the public that the project shall be accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the 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 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>The condition regarding information to the public about the accorded environmental clearance SEIAA/GUJ/EC/5(f)/2947/2022 DATED 17-Dec-22 by the SEIAA had published in local newspaper as shown in Annexure -12.</p>

145	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 st June and 1 st December of each calendar year	<p>Half-yearly compliance reports on Environmental Clearance conditions status submitted regularly to respective Regional Office of MoEFCC, the respective Zonal office of CPCB and SPCB.</p> <p>Copy of last half yearly compliance report submitted to zonal office of CPCB and SPCB is shown below.</p> 
146	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 provision of Environment (Protection) Act 1986.	Noted, we ensure submission of all factual data in all correspondence with MOEF and GPCB.
147	The project authority shall also adhere to the stipulation made by the Gujarat pollution control board.	We are adhering to requirement made by GPCB and other statutory authority as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.
148	The SEIAA may revoke and suspend the clearance, if Implementation of the any of the above conditions is not found satisfactory.	Noted, we agree for this condition.
149	The company in a time bond manner shall implement this condition. The SEIAA reserves the right to stipulate additional conditions, of the same is found necessary.	Noted
150	The project authorities shall inform the GPCB, regional office of MoEF and SEIAA about the date of financial closer and final approval of the project by the concerned authorities and the date of the start of the project.	<p>The construction/erection of Polytetrafluoroethylene plant work is in progress.</p> <p>TFE/PTFE construction was started in Apr-21.</p>
151	This environmental clearance is valid for 10 years from the date of issue.	Noted.

152	Any appeal against this environmental clearance shall lie with national green tribunal ,if preferred within a period of 30days as prescribed under section 16 of the national green tribunal act, 2010.	Noted, till today we have not received any appeal or representation etc. from NGT or any other NGO.
153	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 environmental clearance cancelled	Noted.
B4	<u>COMPLIANCE OF ENVIRONMENT CLEARANCE/REPORTING/APEAL:</u>	
154	Project proponent shall submit certified compliance report of IRO, Gandhinagar for existing EC Obtained within 10days.	Complied.
155	Project proponent shall inform to all the concerned authorities including municipal corporation and district collector and shall also give wide publicity through advertisement in minimal two local newspapers within seven days, about the environmental clearance order accorded.	<p>The condition regarding information the public about the accorded environmental clearance by the MoEF had published in local newspaper.</p> <p>Copy of each of the same forwarded to the concerned Regional Office of the Ministry.</p> <p>Copy of advertise & submitted to concerned Regional Office of the Ministry is attached as per Annexure-12.</p>
156	Project proponent shall appoint a key person in the organization who shall be responsible for compliance of above condition fully on behalf of the proponent.it will not mean that appointing a key person will exempt the project proponent from the responsibility of compliance. Any change in key person shall immediately be informed to SEIAA and all concerned authorities.	Noted. Dedicated environment management cell is responsible for environmental compliance.
157	Designated key person shall submit six monthly compliance report to SEIAA/SEAC, MOEF& CC, GPCB and nodal department of the government.	Six Monthly reports on Environmental Clearance conditions status submitted regularly to respective Regional Office of MoEF&CC, SEIAA/SEAC, GPCB and nodal department of the government.
158	The nodal department or the any authority or officer authorized by MOEF& CC/SEIAA can inspect the site of the project and all the facilities, for verification of compliances of environmental clearance conditions	Noted.
159	In case of violation reported upon, the project proponent shall be responsible for all the legal actions as per the environment protection act 1986 including SEIAA may cancel, withdraw or keep in abeyance, the environment clearance accorded.	Noted

160	Any person including the project proponent affected by this environment clearance order may file appeal to honorable national green tribunal west zone branch, Pune, preferably within a period of thirty days from the date of issue of environment clearance as prescribed under section 16 of national green tribunal act 2010.	Not Applicable.
161	All complaints and public grievance or representations may be addressed to SEIAA/SEAC in the email addresses (a) msseiaagi@gmail.com & (b) seacguajarat@gmail.com	Noted.