

**COMPLIANCE REPORT OF CONDITIONS
MENTIONED IN ENVIRONMENTAL CLEARANCE
FOR THE PROJECT**

(E. C. Granted on Dated 8th February 2021 vide F. No. J-11011/123/2016-IA II (I)
Government of India, The Ministry of Environment, Forest and Climate Change,
(Impact Assessment Division)

**Expansion of Manufacturing of Bulk Drugs and
Intermediates from 12.85 TPM to 34.8658 TPM
(Period April 2024 to September 2024)**

By



**M/s. Vadivarhe Speciality Chemicals Ltd;
Gut No. 204, Nashik - Mumbai Highway,
Taluka - Igatpuri, District - Nashik,
Pin Code - 422 403 State - Maharashtra**

Submitted by



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Gut No. 204, Nashik Mumbai Highway,
Taluka - Igatpuri, District - Nashik,
Pin Code - 422 403 State - Maharashtra**

Brief About the Proposed Project

1. Proposed Project : Expansion of Bulk Drugs and Intermediates
2. Proposed Capacity : 12.85 TPM to 34.8658 TPM (Expansion Project)
3. Type of Project : As per EIA Notification 2006 Category "A" 5 (f) Section "Synthetic Organic Chemicals Industry (Bulk Drugs and Intermediates)
4. Location Details : Gut No. 204, Nashik-Mumbai Highway, At Post – Wadivarhe, Taluka - Igatpuri, District – Nashik, State – Maharashtra Pin - 422 403
5. Land Area : The proposed expansion project will be in the existing land area of 12,500 sq. mtr.
6. Project Proponent : Vadivarhe Speciality Chemicals Ltd;
7. Name of the Project Proponent : Shri. Anil Ganpat Suryawanshi, Director of the Company
8. Cost of the Proposed Project : 15 Crore (Existing 21 crore)
9. Environmental Clearance Granted : MoEF & CC New Delhi, EC Letter dated 8th February 2021 file No. J-11011/2016-IA (I) Government of India, Ministry of Environment, Forest and Climate Change, Impact Assessment Division

Point-wise EC Compliance Status to various stipulations, terms and conditions laid down by the Ministry of Environment Forest & Climate Change (MoEF & CC) New Delhi

Compliance Period April 2024 to September 2024		
(EC Received on 8 th February 2021)		
Compliance Conditions		
Specific Conditions		
Sl. No.	Terms and Conditions	Compliance
i	The Bank guarantee shall be released after successful implantation of the Remediation Plan and Natural and Community Resources Augmentation Plan, and after recommendation by Regional Office of the Ministry, EAC and approval of the Regulatory Authority. In case of failure to complete the remediation plan within stipulated time line, the fresh bank guarantee shall be submitted.	<p>Agreed and noted, we have complied and implemented the Remediation Plan, Natural Resources and Community Welfare Augmentation Plan and the details regarding above are already submitted in the form of separate reports <u>(Attachment-1 and Attachment-2) submitted along with the EC conditions Six monthly compliance report (October-2023 to March-2024) on dated May 29th 2024 for the release of BG submitted to the State Pollution Control Board.</u></p> <p>Copy is attached at Annexure-I</p> <p>The details of the implementation of the remediation plan, natural and community resources augmentation plans as mentioned in the EC conditions are submitted separately with the expenditure statements.</p>
ii	As proposed, Rs. 216.82 Lakhs towards Remediation plan, Natural and Community Resource Augmentation plan to be spent within a span of three years as per Annexure, whereas bank guarantee shall be for 5 years.	<p>Agreed, the company has made expenditure to fulfill the requirements as mentioned in EC conditions for the proposed expansion project and as proposed more than (Rs. 216.82 lakhs) as committed are spent (i.e. Rs. 254.69329/-L) towards Remediation Plan, Natural Resources and Community Welfare Augmentation Plan within a span of three years for release of BG after 5 years.</p> <p>(A) In three years, the company has planted total 6573 plants, out of which 1757 are planted within and around the plant and rest of the plants (4816) are planted nearby villages. The total</p>

		<p>expenditure made towards the plantation is Rs. 98.595 lakhs. In addition to this, the company has carried out more plantation along the road side i.e. from highway to company. The details regarding whole plantation carried out by the company within and outside the plant as well as nearby villages are already mentioned in the separate report submitted earlier (Annexure-II).</p> <ul style="list-style-type: none"> • As per remediation plan in air environment, total expenditure made in dust suppression is Rs. 28.80 lakhs in three years please see Attachment - 1 (separate report submitted earlier). • During construction, the company had spent Rs.1.32 lakhs for purchasing barricades. • As mentioned earlier, the company has planted 6573 plants in and around the plant, road side plantation in three villages and massive plantation on the slope of the hills of the village Wadivarhe & Padli Deshmukh. The total expenditure incurred in three years towards Air Environment is Rs. 28.80 lakhs + 1.32 lakhs + 98.595 lakhs = Rs. 128.715 lakhs. <p>In noise environment the company has purchased PPE's for the safety of the employees during three years and the expenditure made is given below:</p> <ul style="list-style-type: none"> • In 2021-22 for Rs 12.27862 lakhs • In 2022-23 for Rs. 8.72350 lakhs • In 2023-24 for Rs. 17.79637 lakhs <p>So, total expenditure incurred in three years is Rs.38.79849 lakhs (Attachment - I (separate report submitted earlier)).</p> <p>In water environment, for rain water harvesting (RWH) tank is constructed in Padli-Deshmukh village costing Rs. 6.0 lakhs (Attachment - I (separate report submitted earlier)). In Belgaon-Kurhe village, damage dug-well which was not in use is made operational by renovating and the water will be used for Cattle's</p>
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		<p>drinking. The expenditure made by the company is Rs. 5.68 Lakhs. So the total expenditure made in three years is Rs. 11.68 lakhs (Attachment - I (separate report submitted earlier)).</p> <ul style="list-style-type: none"> • In land environment, leakage proof storage facility for solvents and chemicals is made available costing Rs. 15.0 lakhs (Attachment - I (separate report submitted earlier)). <p>In Ecology, green belt and plantation is carried out in and around the plant and road side. Out of 2013 plants as mentioned in Air environment, 1357 plants are planted within and around the plant and road side. The total expenditure incurred towards plantation and green belt is Rs. 10.66500 lakhs. (Attachment - I (separate report submitted earlier))</p> <ul style="list-style-type: none"> • For solid and hazardous wastes: The company has installed OWC in the space available with the company. The expenditure made for the installation of OWC is Rs. 5.47 Lakhs (Attachment - I (separate report submitted earlier)). • Color bins are purchased for collection and storage of solid wastes generation from the villages and the plant. The total bins purchased are 101 nos. The expenditure incurred is Rs. 4.42 lakhs. • For making storage facility for solvents and chemicals provision has been made by the company for safety point of view. The expenditure made is Rs. 0.20 lakhs. (Attachment - I (separate report submitted earlier)). The total expenditure incurred is Rs. 10.09 lakhs. • Related to Social aspects, expenditure made for first aid kit in the form of PPE's, Scaba suit, gas mask and medicine included in PPE's as mentioned in noise environment. The total expenditure incurred under social
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		<p>aspects is Rs.7.75 lakhs (Attachment - I (separate report submitted earlier)). Overall expenditure made under remediation plan for three years is estimated as Rs. 212.03349 Lakhs.</p> <p>(B) Related to community augmentation plan: it is to be mentioned here that during the survey, it was observed that all the village houses are having individual sanitation facility in the form of toilets. Community toilets observed at the boundary of the village Wadivarhe in two places. Total community toilets are 20 in nos. but observed in bad shapes and poor conditions. So it was decided to renovate these toilets for better conditions and to make these operational. The company has renovated the said toilets and the expenditure incurred towards is Rs. 11.13979 lakhs (Attachment - I (separate report submitted earlier)).</p> <ul style="list-style-type: none"> • For medical checkup champs in nearby areas and supply of medicines have been made as mentioned in Remediation plan and the expenditure already incurred is Rs. 7.75 lakhs. (Attachment - I (separate report submitted earlier)). • Related to providing study materials, uniform, books etc. to the poor students. It is to be mentioned here that budget allocation under CER was made available for 2021-2022, 2022-2023 for Rs. 10.30 lakhs, out of which Rs. 4.82 lakhs & Rs. 1.62 lakhs were spent respectively. The total amount spent in two years was Rs. 6.44 lakhs. Apart from this, in year 2023-2024 expenditure made in village Kurhegaon for providing Computer set, Globe, Green board with stand, Geometry box and study materials with stationary is Rs. 0.5 lakhs. So total expenditure made
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		<p>during three years is Rs. 6.94 lakhs. (Annexure-III (Separate report)).</p> <ul style="list-style-type: none"> • Related to training for farmers regarding advance agriculture practices and water conservation, the company had arranged training program for above subject matters to the villagers in 2023-2024 and the expenditure incurred towards is Rs. 2.5 lakhs. (Annexure-III (Separate report)). Apart from the training to the farmers, provision of fund allocation of Rs. 0.51 Lakhs towards the Police welfare activities was made. The total expenditure made Rs. 3.01 Lakhs. • Related to construction of community hall in nearby villages. It is to be mentioned here that during the survey in subsequent years, it was observed that all villages are having community hall constructed by grampanchayat, however community halls in two villages i.e. Lahangewadi and Gonde require modification and renovation, so modifications and renovations were made in the form of modification of kitchen and cementing, plastering, painting, electric fitting and fitting of ceiling fans, man powers and material cost etc. The total expenditure incurred is Rs. 10.59 lakhs (Annexure-III (Separate report)). The total expenditure made during three years is Rs. 31.67979 lakhs. <p>(C) Natural resource augmentation plan:</p> <ul style="list-style-type: none"> • Related to greenery in surrounding areas and road side plantations, this is already mentioned in RP, and this expenditure (Rs. 7.5 lakhs) is already made out of the total expenditure made for plantations, (please see Attachment - I (separate report submitted earlier)) • Related to provision of drinking water facilities through hand
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		<p>pumps/dug wells/tube wells, during the surveys it was observed that all the villages are having water distribution systems through overhead reservoir of each village. One dug well in village Belgaon was found to be in bad condition and needs repairing and renovation. This is carried out by the company and expenditure made is Rs. 5.68 lakhs (Annexure-III Separate report).</p> <ul style="list-style-type: none"> • Related to providing Solar street light comprising MS pole LED lamps attached to the solar panel etc. in villages. The company has made arrangement for all above facilities in five villages namely Wadivarhe, Gonde, Belgaon, Kurhegaon and Padli-Deshmukh. Total expenditure made is Rs. 1.53 lakhs (Annexure-III Separate report). <p>For repairing and maintenance of roads in nearby villages, road repairing was made in village Wadivarhe for which expenditure of Rs. 3.77 lakhs was made. (Annexure-III Separate report).</p> <p>So total expenditures made in NRAP is estimated to be Rs. 10.98 lakhs.</p> <p>As per compliance of RP, natural and community resource augmentation plan the total expenditure made Rs. 254.69329 as against provision made (committed) Rs. 216.82 lakhs.</p>
iii	<p>Approval / permission of the CGWA / SGWA shall be obtained before drawing ground water for the project activities, if applicable. State Pollution Control Board (SPCB) concerned shall not issue Consent to Operate (CTO) till the project proponent obtains such permission.</p>	<ul style="list-style-type: none"> • The industry is drawing surface water from Mukane Dam for the existing and for proposed expansion project for which permission for drawl of surface water is already taken from Irrigation Department. <p><u>Copy is attached as (Annexure - IV).</u></p> <ul style="list-style-type: none"> • No ground water is drawn for the existing and proposed expansion project.
iv	<p>Preventive measures to be taken to control ignition sources in bulk storage area and fire protection system to be</p>	<ul style="list-style-type: none"> • All preventive measures are already taken-up to control ignition sources in bulk storage area for the

	<p>established above ground storage tanks. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.</p>	<p>existing plant and fire protection system is in place. Same is followed for its proposed expansion.</p> <ul style="list-style-type: none"> • Solvents are stored in a specified place with all safety measures and precautions. • Adequate control measures are provided to detect fire and fight fires. • The major firefighting arrangement already provided in the industry which includes: 40 numbers of optical smoke detectors along with 8 numbers manual call points and 8 number hooters. • Firefighting Arrangements : Fire hydrant system consisting of 17 numbers of fire hydrants have been installed and 69 numbers of fire extinguishers consisting ABC, CO₂ and Foam type are installed at various locations of the premises. Same system is in practice for expansion project. • Nitrogen Plant is provided for blanketing while transfer of flammable solvents. Training is provided to concern personnel for the operations. Same system is being practiced for expansion project. • Earthing is provided in all the electrical equipment wherever solvent handling is done. The same is being extended for the expansion project. • Flame proof electrical fittings are used wherever solvent handling is done for the purpose of expansion. We have also provided earth point identification for all over the plant locations. We have also earth monitoring system for our solvent storage facility and earth
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		continuity meter at solvent loading and pumping system. <u>Copy is attached as (Annexure - V).</u>
v	Proper measures to be taken to prevent internal tank explosion. Chemicals that are water reactive needs to be separated from chemicals that do not react with water.	<ul style="list-style-type: none"> • The company is taking proper measures and made arrangement to prevent internal tank / drums explosion in the existing and for the expansion project. The following safety measures have been implemented in the solvent storage area in the plant. The facilities and the arrangements already made in the industry are as follows : <ol style="list-style-type: none"> 1. Gas detectors are available 2. Alarm system are in place 3. Fire hydrant system is available 4. Fire extinguishers are in place 5. Jumpers are in place at flange points 6. Earthing and bonding are in place • Following control measures are implemented in the existing and for the expansion project: <ol style="list-style-type: none"> 1. Fencing and No Smoking for prohibited area, warning signage are displayed in Hindi, English and local language at prominent places. <u>Photographs related to the above system available with the company are attached as (Annexure - VI).</u> • Trainings are being conducted regularly to all personnel involved / engaged in handling solvent activities. It will be continued if there will be new recruitments for the expansion project. 2. PPE's are provided to the personnel working at different workplaces as per the requirements and safety guidelines. The total expenditure made for PPE's during the year

		<p>2021 to 2024 are mentioned in RP. <u>Photographs are attached as (Annexure - VII).</u></p> <ul style="list-style-type: none"> Chemicals that are water reactive required for manufacturing of proposed products are being separated from other chemicals and stored in a safe and protected containers to avoid any reaction with water.
vi	<p>Proper precautions to be taken to prevent inadvertent mixing of chemicals. Standard operating procedures to be strictly followed during handling of chemicals. Solvents shall be stored in a separate space specified with all safety measures.</p>	<ul style="list-style-type: none"> Proper precautions are being taken in the existing and the proposed manufacturing products to prevent inadvertent mixing of chemicals and spillages. Provision has already been made for avoiding any leachates to be mixed. Separate storage facility with surface concreting is made. Cost incurred towards leachates proof storage facility is Rs. 0.20 Lakhs. SoP's are followed to prevent any mixing of chemicals and spillages during handling of chemicals and solvents. Regular training related to above is also given to the personnel working and handling chemicals /solvents to avoid spillages and to prevent inadvertent mixing of chemicals. Separate storages are created for storage of chemicals and solvents with all safety measures and guidelines. <u>Photographs are attached as (Annexure - VIII).</u>
vii	<p>Risk assessment studies conducting 3 D modelling studies for identification of hazards, consequence analysis due to the accidental release of hazardous chemicals, quantification of risk based on failure probability of equipment, mitigation measures to reduce risk and delineation of disaster management</p>	<p>Risk assessment studies conducting 3 D modeling studies for identification of hazard consequence analysis due to the accidental release of chemicals and quantification of risk based on failure probabilities of equipments, mitigation measures to reduce risk and delineation of disaster management</p>

	<p>plan shall be undertaken and submitted to the Ministry within 3 months.</p>	<p>plan are carried out and report is already submitted to MoEF & CC, New Delhi at the time of getting EC.</p>
<p>viii</p>	<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 project shall be implemented.</p>	<p>The company is complying with all the environmental protection measures and safeguards as per the documents submitted and recommendations in EIA / EMP report in respect to Environment Management and Risk Mitigation Measures.</p> <p>The company is regularly monitoring Air Quality with respect to PM_{2.5}, PM₁₀, SO₂, NO_x and CO and submitting the reports along with the compliance report regularly. All measures related to release of gases emissions are being taking care with proper installation of stacks, scrubbers, vents etc. to Boiler and Scrubbers. The concentration levels of above Air Quality Parameters are found within the NAQMS. This is regularly practicing by sprinkling water along the road side and within the plant (as mentioned in the RP). Online monitoring system related to air and water are available with the company to monitor quality and quantity.</p> <p>The Noise Levels are also monitoring regularly within and surrounding areas of the plant and observed within the Noise Level Standards prescribed by CPCB.</p> <p>Related to Wastewater generation, the quality and quantity of the wastewater are being regularly monitored, properly treated in ETP and treated wastewater is recycled in the plant for various purposes as per ZLD commitment. Domestic waste generated from the plant is regularly monitored for its quality and quantity and treated in STP. The treated water is being used for gardening.</p> <p>Solid and Hazardous Wastes are collected and disposed off as per Solid and Hazardous Wastes Management</p>

		<p>Rule 2016. Provision has already been made for collection and disposal system of Solid and Hazardous Wastes Management within the plant and solid waste management in the surrounding villages. Hazardous waste generated are collected and stored in safety place within the plant and sent to authorized vendor for disposal. Solid and hazardous waste generated from the plant and the surrounding area are collected in bins placed at different places in the surrounding villages and also within the plant and sent for disposal. (separate report Annexure - IX).</p>
ix	<p>As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste / treated water shall be discharged outside the premises. Treated effluent shall be reused in the process / utilities. Treated Industrial effluent shall not be used for gardening / greenbelt development / horticulture.</p>	<p>The company is achieving Zero Liquid Discharge (ZLD) for the existing and proposed expansion project. No waste / treated effluent is discharged out-side the premises. The company is not using treated industrial effluent for green belt development/gardening/horticulture. <u>Water balance diagram is attached as (Annexure - X).</u></p>
x	<p>Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel / drain carrying effluent within the premises.</p>	<p>The activities related to the continuous online (24x7) monitoring system for stack emissions is carried out. The company has installed continuous online (24x7) monitoring system. The connectivity with MPCB and CPCB has been established and the data including concentration of emission levels of related parameters of gases are being transferred to MPCB & CPCB server regularly as mentioned in the EC condition.</p> <p>For online continuous monitoring of effluent, the company has installed web camera with night vision capability and flow meters in the channel / drain carrying effluent within the premises. <u>Photos of installation of OEMS are shown as Annexure-XI.</u></p> <p>However, the company is monitoring flue gases emissions through stacks / vents attached to different pollution</p>

		control equipments regularly. The details of the monitoring data along with the concentration levels of gases emission along with stack / vent details are being regularly submitted along with the compliance report. ETP and STP inlet and outlet effluents (untreated and treated) along with the solid and hazardous waste generated and its disposal pattern as well as ambient air quality within the plant premises, the potable water quality, the Industrial and Domestic water quality (Mukane Dam) are given in Annexure-XII . This indicates that the company has taken all the measures to keep emission level below the prescribed limits of SPCB & CPCB. Related to wastewater treated in STP & ETP, the concentration levels of related parameters are also found below prescribed limits of SPCB & CPCB.
xi	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.	Inventory with respect to quantity and storage of toxic and hazardous raw materials required for manufacturing of existing and proposed products are being made as a regular practice of the company and the inventory regarding is submitted along with the compliance report. Copy is attached at Annexure-XIII.
xii	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.	Separate Occupational Health Center already existing in the company, the company is regularly organizing health check-up camps for the workers and employees and accordingly deployment of the duties of the workers / employees are made in the company. The company has spent Rs. 6.0 Lakhs for organizing and conducting health check-up camps for the employees, workers and the villagers during the years 2021-2022 and 2022-2023 dated 08/09/2021, 05/09/2022 and 05/12/2023 respectively from the date of EC granted. Copies are attached with Photographs at Annexure-XIV.

		<p><u>Moreover, the company has arranged Health Checkup Camps during the year 2023-2024. The expenditure made of Rs. 1.75 Lakhs. Photographs at Annexure-XV.</u></p> <p>The company is providing PPE's to the workers and the employees working at the workplace. During the years 2021-2022 and 2022-2023, the company has spent Rs. 12,27,862 /- and Rs. 8,72,350/- on PPEs respectively including first aid kits and medicines. <u>(Copy is attached with Photographs as Annexure-XVI also please see Attachment - I Separate report which is already submitted).</u></p> <p><u>Moreover, during the year 2023-2024, the management has spent Rs. 1779637.44 for procuring PPE's to the employees and the workers of the company including first Aid kit & Medicines. (Annexure-XVII, also please see Attachment - I separate report which is already submitted).</u></p>
xiii	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.	The company is regularly and periodically arranging induction training to their workers and employees those who are engaged in handling chemicals / solvents for safety and health aspects along with the visual trainings. <u>Photographs are attached as Annexure - XVIII.</u>
xiv	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.	As mentioned in compliance of point no. IV, adequate fire control measures are already taken-up by the company for protecting the possible fire hazards during the manufacturing process in the material handling. Same is extended and implemented in the expansion project as and when required during the manufacturing of the proposed products. Firefighting system is already available in the company as mentioned earlier at various locations in the premises.
xv	Solvent management shall be carried out as follows:	All these from (a) to (f) are already in practice in the existing plant and are

	<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</p> <p>(e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses</p> <p>(f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.</p>	<p>being continued in the expansion project.</p> <p><u>Annexure - XIX.</u></p>
xvi	<p>Total fresh water requirement shall not exceed 37.92 cum/day, proposed to be met from Mukane Dam water supply through tankers. Necessary permission in this regards shall be obtained from the concerned regulatory authority, and renewed from time to time.</p>	<p>Noted, The permission related to the total water requirement for the industry is granted from the Irrigation Department. Rate agreement has been made with the irrigation department and valid up-to January 2025. <u>Copy of the same is attached as Annexure - XX.</u> The total fresh water requirement will not exceed 37.92 cum/day for drawl from Mukane Dam.</p>
xvii	<p>Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent / any waste water shall not be allowed to mix with storm water.</p>	<p>The rain water and the storm water coming from low line areas are being collected in constructed tank. The harvested water is used for various industrial process required after proper treatment. Proper care is being taken not to mix the process effluent with the storm water as the storm water collection system is channelized directly to the storage tank. It is to be mentioned here that storm water collection tanks are already constructed. The rain water harvested is also being used for flushing and washing to save raw / treated water.</p>
xviii	<p>The company shall undertake waste minimization measures as below:</p> <p>(a) Metering and control of quantities of active ingredients to minimize waste.</p>	<p>Noted and agreed,</p> <p>a. Waste minimization is our top most priority. It is to be mentioned here that all the raw materials that are being used in</p>

<p>(b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.</p> <p>(c) Use of automated filling to minimize spillage.</p> <p>(d) Use of Close Feed system into batch reactors</p> <p>(e) Venting equipment through vapor recovery system</p> <p>(f) Use of high pressure hoses for equipment clearing to reduce waste water generation</p>	<p>the manufacturing process are routed through pipelines to avoid any spillages and contamination of the working area / soil. Other means of waste generation are minimum. The product manufacturing involves chemical reactions of the reactants which are mostly stoichiometric so the products are manufactured by feeding controlled quantities of the reactants (active ingredients) and the waste is minimized.</p> <p>b. There are no by-products generation from the proposed manufacturing of drugs and intermediates, however some residual waste materials are obtained which are being sold to authorized vendors.</p> <p>c. All the raw materials that are charged in the reactors are routed through pipeline and same practice is being adopted for the manufacturing of the products in expansion project, so there are no / remote chances for spillages anywhere.</p> <p>d. Use of closed feed system in batch reactors is already in practice in the existing manufacturing and same practice is adopted for manufacturing of the proposed products.</p> <p>e. Although vapor condensing system for recovery of solvent is already installed in the existing plant, new scrubber is installed in the manufacturing of proposed products to control vapors, if any.</p> <p>f. The company is already using high pressure hoses for equipment cleaning to reduce waste water generation and same is being practiced for the expansion project.</p>
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xix	<p>The green belt of at least 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map.</p>	<ul style="list-style-type: none"> • Plantation around and within the plant premises is already developed in 4,600 sq. mtr (36.8%) area of the total plant area (12,500 sq. mtr). • Additional plantation in and around periphery of the plant boundary is carried out (Number of plants 105 + 256 = 361) during the year 2022 and 2023 as per Central Pollution Control Board guidelines. The total plantation carried out within and outside the plant in surrounding area during the year 2023-2024 is 711. (The details regarding the plantation carried out within and surrounding area of the plant is given in RP, Annexure-II also separate report is already submitted). Proper in house maintenance of the plantation (within and outside of the plant surrounding area) along with the workers hired by the company are being taking care with the help of forest officer. Massive plantation are carried out along the road side and the villages during the year 2023-2024, over all plantation carried out in & around the plant, road side of the plant and villages and hill slopes of the villages Wadivarhe & Padli Deshmukh. The total plantation carried out is 6573. List of plantation carried out are mentioned in separate report, with photographs. Please see Annexure-II, separate report is already submitted.

xx	<p>As per the Ministry's OM dated 30/09/2020 superseding the OM dated 01/05/2018 regarding the Corporate Environmental Responsibility, and as per the action plan proposed by the project proponent to address the public hearing and socio-economic issues in the study area, the project proponent shall provide support for educational assistance, cleanliness and hygiene program to the schools, medical assistance, Plantation, Sanitation and waste management, drinking water facility in the nearby villages. The action plan shall be completed within three years as proposed. All the commitments made during public hearing shall be satisfactorily implemented.</p>	<ul style="list-style-type: none"> • Noted and the company is complying for the same as per CER action plan proposed and also as per the ministry's OM dated 30/09/2020 to address the public hearing and socio-economic issues in the study area. • The company is already providing support for educational assistant, cleanliness, and hygiene programs to the schools, medical assistance, plantation, sanitation, waste management, drinking water facilities in nearby villages and it will be continued further. <u>Photographs are attached as Annexure - XXII.</u> • The action plan given is completed within 3 years. The company has made the satisfactory implementation of the commitments made during the public hearing and as per the provision made in the necessary budget by the company under CER. Provision for necessary budget has been made for implementation by the company under CER. The total budget allocated towards above was Rs. 10,30,000/- for the financial years 2021-22 and 2022-23, out of which Rs. 4,82,000/- was spent in 2021-22 and Rs. 1,62,000/- is spent in 2022-23, so total expenditure made in 2021-22 and 2022-23 was Rs. 6,44,000/- The Balance amount of Rs. 386000/- is also spent during 2023-24 under CER for various activities as mentioned above. <u>Photographs are attached as Annexure - XXIII.</u>
xxi	<p>A separate Environmental Management Cell (having qualified person with Environmental Science /</p>	<p>The company is having quality control lab equipped with all necessary facilities, infrastructures and</p>

	<p>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.</p>	<p>instrumentations/equipments required for the industry, additional facilities are developed related to the infrastructure and the equipment required for analytical laboratory for environmental samples analysis and monitoring (Annexure-XXIV). The company is having its Environment Management Cell and safety unit equipped with all the facilities and manpower. The management of the industry adheres in conforming and maintaining the standards set by the State Pollution Control Board in totality. The organogram of EMC which is functional at M/s. Vadivarhe Speciality Chemicals Ltd; along with responsibilities are attached as Annexure-XXV.</p>
Compliance of other General Conditions		
i	<p>No further expansion or modification 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 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 addition environmental protection measures required, if any</p>	<p>Agreed and point is noted. However, it is to be mentioned here that the EC is granted by the MoEF & CC New Delhi, on dated 8th February 2021 for the expansion of the product manufacturing from 12.85 TPM to 34.8658 TPM. The number of products to be manufactured is also listed in the EC granted. It is to be mentioned here that due to the market demand, certain new products are introduced for the manufacturing by deleting / removing some EC granted products as the provision is made in the 2006 Notification for change in product mix without change the pollution load by keeping the overall capacity of the production almost same or less. Regarding this, an Application vide No. MPCB-CONSENT-0000131963 dated 12/02/2022 was submitted to the SPCB for “change in product mix without change in pollution load” along with the report mentioning details of number of existing and new products to be manufactured with quantity and no change in pollution load even after</p>

		<p>change in product mix. The report was submitted with the information to the MoEF & CC New Delhi. The acknowledgement copy related to this, received from the MoEF & CC, New Delhi and attached as <u>Annexure-XXVI</u>. The CTO from the SPCB is granted vide Format1.0/AS(T)/UAN No. 0000131963/CO/2209002023 dated 30/09/2022 for change in product mix without change in pollution load with the validity up-to 30/11/2022. <u>Copy is attached as Annexure-XXVII and Annexure-XXVIII</u>. Further it is renewed vide Format1.0/AS(T)/UAN No. 0000149642/CR/2301000641 dated 05/01/2023 with a validity up-to 30/11/2024. <u>Copy is attached as Annexure-XXIX</u>. Further the company has applied for the renewal of CTO and the CTO no. is granted (MPCB-CONSENT-0000223742), copy of CTO is awaited. The proposed expansion is carried out in the existing land area. Please see the attached EC Letter from MoEF & CC New Delhi, as <u>Annexure-XXX</u>. We have obtained CTE and CTO for the proposed expansion. <u>Copies are attached as Annexure-XXXI and Annexure-XXXII</u>.</p>
ii	<p>The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.</p>	<p>The total power requirement will be 450 KVA. The main source of power is MSEDCL. Solar Electricity Generation Plant is installed at the factory premises for the energy generation between 886 units to 1063 units per day and sufficient to utilize for the production of existing and proposed products. <u>Annexure-XXXIII</u>.</p> <ul style="list-style-type: none"> • For lighting purpose as mentioned in the condition, LED based or advanced having preference in energy conservation and environment

		betterment is in practice. <u>Annexure Annexure-XXXIV.</u>
iii	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 source 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).	<ul style="list-style-type: none"> • We are regularly monitoring noise levels in and around the plant area and found to be within the prescribed limits of Central Pollution Control Board for day and night time. The monitoring data is already attached. However for, noise control measures viz. acoustic hoods, silencers and enclosures etc. are provided at all the sources of noise generation in the existing plant and is being continued / extended further for the proposed expansion as per the requirements. Moreover, additional plantation are raised in and around the periphery of the plant that will also help to attenuate the noise level. • We have made mandatory use of PPE's for all the workers working in the noise generating area and at source equipments. • We have made the peripheral plantation to reduce / attenuate the noise effect to the surrounding area. • Ambient noise levels of the surrounding area are regularly monitored and is attached. In addition to this, additional plantation is also carried out along the periphery and within the plant area to restrict the pollutants and noise levels. <u>Photographs are attached as Annexure-XXXV.</u>
iv	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be	All the relevant measures are being taken-up and in process for improving the socio-economic conditions of the surrounding area of the plant. CER activities are taken-up and in-process related to the activities like Medical

	<p>implemented. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.</p>	<p>Camp organization for health check of the employees, workers and the nearby villagers as per the provision made. Similarly health, hygienic and environmental awareness program are also conducted by floating pamphlets and demonstrating posters. The company is in process of undertaking eco-developmental measures including community welfare measures in the surrounding project area for improving the environment. Provision for budget to carry out the activities under CER as mentioned in point number XX, is already made and the report regarding is already submitted along with the report of RP, NRAP & CRAP (Please see Sixth monthly compliance report of October 2023 to March 2024 attached with separate report). Moreover as per the commitment Balance amount Rs. 386000/- will be used for above said activities during the year 2023-2024. Moreover as per the commitment made in EIA/EMP report for CER, the expenditure is made towards several activities mentioned in CER, out of the total expenditure of Rs. 27.90 lakhs committed by the company has been spent more i.e. Rs. 35.03 lakhs for conducting several mentioned activities (please see separate Annexure- III of CER attached with Six monthly compliance report of October 2023 to March 2024).</p>
v	<p>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</p>	<p>The company has committed budgetary provision of Rs. 2,41,60,000/- (Capital - Rs. 211.60/- L and recurring (Rs. 30.00/- L) as expenditure to be made on EMP given in EIA report) for implementation as per the EC conditions stipulated by MoEF & CC New Delhi. The company has made expenditure of Rs. 260.13825 /-L for the implementation as per the schedule for all the conditions stipulated. The funds allocated is not</p>

	management / pollution control measures shall not be diverted for any other purpose.	being used or diverted for any other purposes. The details regarding measures taken by the company related to environmental monitoring, pollution control measures related to all the environmental components with the expenditure statement made is given in separate report submitted earlier as attachment with six monthly EC compliance report (October 2023 to March 2024), please see Annexure-XXXVI as expenditure statement for Environment Management Plan.
vi	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, ZillaParishad / Municipal Corporation, Urban local Body and the local NGO, if any from whom suggestions / representations, if any were received while processing the proposal.	Already Complied and mentioned in earlier compliance report.
vii	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environment Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective 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>Noted and complying After Environmental Clearance issued by the MoEF & CC New Delhi on dated 8th February 2021, the Six Monthly Compliance Reports submitted till to date are as follows:-</p> <ul style="list-style-type: none"> • First Six Monthly EC Compliance Report (February 2021 to March 2021) was submitted on 27/05/2021, • Second Six Monthly EC Compliance Report (April 2021 to September 2021) was submitted on 26/11/2021 • Third Six Monthly EC Compliance Report (October 2021 to March 2022) was submitted on 18/05/2022 • Fourth Six Monthly EC Compliance Report (April 2022 to September 2022) was submitted on 29/11/2022

		<ul style="list-style-type: none"> • Submitted Fifth Six Monthly EC Compliance Report (October 2022 to March 2023) on 22/05/2023 • Submitted Sixth Six Monthly EC Compliance Report (April 2023 to September 2023) on 30/11/2023 • Submitted Seventh Six Monthly EC Compliance Report (October 2023 to March 2024) on dated 29/05/2024. • Submitting herewith Eighth Six Monthly EC Compliance Report (April 2024 to September 2024) to: <ul style="list-style-type: none"> (i) The Regional Officer, MoEF & CC, Nagpur, (ii) The Member Secretary, MoEF & CC, New Delhi, (iii) The Regional Directorate, CPCB, Pune, (iv) The Member Secretary CPCB, Delhi, (v) The Member Secretary, SPCB, Mumbai and (vi) The Regional Officer, SPCB, Nashik <p><u>Acknowledgement Copy is attached as Annexure-XXXVII.</u></p>
viii	<p>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 environment clearance condition and shall also be sent to the</p>	<ul style="list-style-type: none"> • Noted and complying, we are regularly submitting Environment Statement for each financial year ending 31st March in Form-V to State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and also on the website of the company along with the status of compliance of Environment Clearance conditions through e-mail to the Regional Office of the

	respective Regional Offices of MoEF & CC by e-mail.	MoEF & CC and will continue the same. <u>Environmental Statement for financial year 2023-2024 is attached as Annexure-XXXVIII.</u>
ix	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.	Complied and mentioned in the earlier submitted six monthly compliance reports.
x	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 date of start of the project.	Noted , the date of financial closure and the final approval of the project is made by the Board of Directors. However it is to be mentioned here that mostly existing facilities and infrastructure are being utilized for the proposed manufacturing products as per the requirement of the demand of the market.
xi	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.	The point is noted.