



State Environment Impact Assessment Authority, M.P.
(Ministry of Environment, Forest and Climate Change, Government of India)

Environmental Planning & Coordination Organization

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To,
M/s Symbiotec Pharmalab Pvt. Ltd,
Plot No. 385/2, Pigdamber, Rau,
Mhow - Dist Indore, MP-453331

No.: 3339 /SEIAA/19

Date: 28.11.19

Sub:- Case No. 5784/2018 : Prior Environment Clearance for proposed Capacity Expansion of Manufacturing of Bulk Drug & Intermediate from 14 TPA to 30 TPA at Plot No. 385/1, 385/2, 390/1/2, 389/1, Village- Pigdamber, Rau, Mhow Dist. Indore (MP) Total Plot Area- 22258.0 sq.m. by M/s Symbiotec Pharmalab Pvt. Ltd, Plot No. 385/2, Pigdamber, Rau, Mhow - Dist Indore, MP-453331 e-mail: symbiotec@symbiotec.in Mob No. - 9630090963 Env't. Cons- Enviro Resources , Andheri (W) Mumbai

Ref: Your application dtd. 02.11.18 received in SEIAA office on 02.11.2018

With reference to the above, the proposal has been appraised as per prescribed procedure & provisions under the EIA notification issued by the Ministry of Environment & Forests vide S.O. 1533 (E), dated 14th September 2006 and its amendments, on the basis of the mandatory documents enclosed with the application viz., Form I, pre-feasibility report, ToR, EIA Report, ppt. and additional clarifications furnished in response to observations by the State Expert Appraisal Committee (SEAC) and State Environment Impact Assessment Authority (SEIAA) constituted by the competent Authority.

- (i) This is a case of proposed capacity expansion of manufacture bulk drug and drug intermediates and introduce new one with equal or lower capacity based on changed market scenario. The Company is now planning for increasing the production capacity of STEROIDS together from 14 MTPA to 30 MTPA.
- (ii) The major facilities involved are Boiler, Cooling Towers, Effluent Treatment Plant (ETP), STP and R.O Plant Facilities like administrative office, parking and greenbelt/plantation also developed as per plan/requirement.
- (iii) The project is covered as item 5(f) in the schedule of EIA notification 2006 and amended notification SO 1599(E) dated 25.06.2014, the unit is small (SSI category) with water consumption less than 25 KLD, Fuel consumption less than 25TPD and not covered in the category of MAH units as per the rule hence requires prior EC from SEIAA..
- (iv) No ecologically protected area or archeologically protected site or other environmental sensitivity has been reported within 05 km radius of the site.
- (v) There is no interstate boundary within 05 km and no National Park / Sanctuary within the 5 km of the project area hence the general conditions are not attracted.

- (vi) PP has submitted list of capacity of existing and proposed products from 14 MTPA to 30 MTPA.
- (vii) Earlier environmental clearance issued by MOEF & CC, Gol dtd. 2008 as the project is located outside the notified industrial area. PP has submitted compliance report certified by Regional office, MoEF& CC vide no. 268 dated 04.04.2019 with following recommendations:

“Implementation of Conditions:- It is inferred from the above that the implementations of environmental conditions are found as 11 agreed to comply, 16 being compiled, 02 partly compiled and some compliance needs improvements which are in progress, PA has been advised for implementation is to be taken care with the project development , attention is to be given to the vital conditions like environmental management, green belt development, capacity & treatment of ETP and also the submission and uploading of six monthly compliance as per stipulation”.

- (viii) Public Hearing for the proposed project was conducted on 29 June, 2019 near Symbiotec Pharmalab Village- Pigdamber, Tehsil - Mhow & Dist. Indore (MP) under the Chairmanship of Add.Collector, Indore. Some issues regarding, impact on human health, employment to local villagers, Implementation of CSR activities, Plantation, Environment pollution were raised during the Public Hearing which were addressed by PP.
- (ix) The expansion is proposed in the company’s existing premises of 22258 sq.m. Regarding land documents PP has submitted sale deed and lease deed dtd. 14.10.05. As per the land documents the landownership is the name of M/s Symbiotec Pharmalab Pvt. Ltd through Director Shri Anil Satwani. The land use breakup of the project are as follows:

Existing And Proposed Land Use Breakup			
	Existing	Proposed	Total
	SQM	SQM	SQM
Production Block	1390	160	1550
Administration Block	479	-	479
Solvent Area	1080	-	1080
Scrap Yard & Boiler	750	250	1000
Security	30	-	30
Utility	375	80	455
R & D Lab	538	-	538
ETP	364	800	1164
Road	1710	240	1950
Parking Area	304	-	304
Total Built Up Area	7020	1530	8550
Green Belt / lawn Area	12344	-	12344
Future Expansion Area	2894	1364	1364
Total Plot Area	22258	22258	22258

- (x) The total water requirement of the project is 73.5 KLD. (Existing : 45.20 KLD Additional : 28.3 KLD) The industrial water requirement for the existing project is 33.2 KL per day which will be increased to a 56.5 KLD. The net fresh water requirement shall be 22.66 KLD. The water supply for the project is being sourced from Narmada water supply (Local body) through pipeline network. Total cumulative waste water generation from existing and proposed unit will be 55.3 KLD and treated in ETP of 100 KLD, RO of 100 KLD and MEE of 15 KL/day respectively. The treated water will be used for cooling towers, floor washing and gardening/green belt.

- (xi) PP has proposed various mitigation measures for water management and wastewater management are mentioned below:
- a. Storm water drainage system has been developed for existing unit and shall be maintained preciously to prevent the flow of silt and other contaminant outside of the site and towards river side
 - b. Blow downs from cooling towers, boiler, scrubber , Softener regeneration, Vacuum pump will go to ETP. High COD wastewater will be sent to COD Stripper. Remaining waste water will be treated in ETP.
 - c. Utilization of treated domestic wastewater in toilet flushing, greenbelt development and dust suppression shall be continue
 - d. A drain along the boundary wall shall be made, which will be connected proposed settling tank/water reservoir to protect the flow of contaminant towards nearby area
 - e. Regular monitoring and analysis of pond and nalla is proposed
 - f. Internet Protocol PTZ camera with night vision facility along with minimum 05X zoom and data connectivity must be provided to the MPPCB's server for remote operations
- (xii) To mitigate the impact of pollutants from boiler stack, diesel generator sets, sources of fugitive emission and vehicular traffic during the operational phase of the site, following measures are proposed for implementation:
- a. Height of all the stacks will be as per statutory requirement. All the stacks will have Stack Monitoring Facility (SMF) consisting of sampling port-hole, platform and access ladder.
 - b. Bag Filters and venturi scrubber are proposed as per the requirement andn nature of pollutant.
 - c. Online monitoring system for the pollutants from the stacks with an arrangement to reflect gaseous emission parameters on company's server shall be provided.
 - d. Transport vehicles will be properly maintained to reduce air emissions. Vehicles will be periodically checked for pollutant emissions against stipulated norms.
 - e. Provision of enclosure for all the loading & unloading operations, if possible.
 - f. Regular monitoring of the stack emission of existing and proposed scrubber shall be carried out.
 - g. Regular monitoring of VOC, concentration in work zone
 - h. Additional greenbelt will be developed around the plant to arrest the fugitive emission
 - i. Bag filter shall be provided at proposed boiler to control the emission below 150 mg per cubic meter.
 - j. Alkaline Scrubber will be attached to the reactor vent to control process SO2 emission.
 - k. In order to control the fugitive dust emissions due to transportation activity, all the operational roads within the plant area shall be asphalted.
- (xiii) Noise attenuating devices like earplugs and earmuffs shall be provided to workers exposed to high noise levels. Noise barriers, silencer and enclosures shall be incorporated in the equipments, which emit high noise level. All basic equipments and

various machineries should be kept well maintained. Green belts are good noise barriers and same will be developed around the plant. The sufficient green belt may be proposed to control noise levels.

- (xiv) Solid waste generated during the manufacturing process and wastewater treatment process is mainly sludge and will be disposed through authorized recyclers.. Hazardous wastes will be collected and stored under separate hazardous waste storage area and will be disposed to Authorized recycler / TSDF facility, as per Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2008 (Amendment 2016).
- (xv) Power will be sourced from existing line of 'Madhya Pradesh Madhya Kshetra Vidyut Vitaran Company'. The total requirement will be 750 KVA. In case of power failure, D.G. set (750, 350, 1000 KVA) will be used as a backup power source .
- (xvi) Particulate matters & other gaseous emission are envisaged as pollutant from boiler and other sources apart from other sources of fugitive emission .Depending on quality of emission from different sources, suitable air pollution control system will be provided.
- (xvii) Existing green belt developed in an area of 12344 sq.m with 3717 nos. of plants. By planting 500 nos of trees as follows:-

Proposed Plantation Detail		
Description	Qty	Location
Forest Trees		
Neem	50	Boundary Wall
Putran Jeeva	50	
Ornamental Trees		
Amaltash	50	Road Main Gate - Admin Block
Ficus Venjamin	50	Around Admin Block
Satparni	50	Around Admin Block
Ashoka Tree	50	Around Admin Block and around boundary limit (Backside of the site)
Fruit Trees		
Mango	50	Along along internal road
Lemon Grafted	50	Near ETP
Medicinal Trees		
Drum Sticks	100	Near pump house
TOTAL	500	

- (xviii) The proposed project has planned extensive pollution control and environmental conservation measures. Also having provisions of CSR expenditure for the welfare activities. Under the CSR PP has proposed following activities:-

S. no	Need Identified For CSR Plan	Activities	Budgetary Provision (Capital) (Rs. In lacs)	Budgetary Provision (Recurring) (Rs. In lacs)
1	Skill Development Programmes for youths as per the requirement of the Unit	Facilitating self-employment skill generation vocational training programmes for creating better self employment ventures through inducing skill among the youths as per the requirements of the unit. A Apprentice type training in association with ITI, Indore/Pithampur or other location.	3.0 Lacs 05 person per year @ Rs 5000/- per month	-

2	Provision of solar lights in the villages	Solar light, at common property of surrounding villages at Panda, Rau, Tihi, Shahada, Bhamti, Umri, Nihalpurmunai, Machli Tekri enable to reduce the dependency on the Govt electric supply	Rs 4 lacs per year per villages	Rs 1.50 For maintenance
3	Infrastructure development at School at Nawada, Umaria and Panda	Infrastructure facilities at schools of nearby villages in terms of provision of computers, teachers, facility of safe drinking water, separate toilets for girls and boys, provision of furniture, additional rooms etc.	Rs.6 Lac per year	Rs 1.0 For maintenance
4	Plantation programme at nearby villages over gvot land	In consideration and with recommendation of gram panchayat	Rs 3 Lac per Year	Rs 1.0 For maintenance
Total			16 Lacs	Rs 3.50 Lacs per year

(ix) PP has submitted on site and of site emergency plan including Disaster Management, Risk Assessment and Fire Fighting.

(xx) Total Cost of the project is 5551.51 Lacs (Existing : 3488.78 Lacs Additional : 2062.73 Lacs) EMP Cost (Capital) Existing : 120.28 Lacs Additional : 506.75 Lacs (Total= 627.03 Lacs)

Based on the information submitted at Para i to xx above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 579th meeting held on 31.10.2019 and decided to accept the recommendations of 396th SEAC meeting meeting held on dtd. 01.10.19.

Hence, Prior Environmental Clearance is accorded under the provisions of EIA notification dtd. 14th September 2006 & its amendments for the proposed Capacity Expansion of Manufacturing of Bulk Drug & Intermediate from 14 TPA to 30 TPA at Plot No. 385/1, 385/2, 390/1/2, 389/1, Village- Pigdamber, Rau, Mhow Dist. Indore (MP) Total Plot Area- 22258.0 sq.m. by M/s Symbiotec Pharmalab Pvt. Ltd, Plot No. 385/2, Pigdamber, Rau, Mhow - Dist Indore, MP-453331 subject to the compliance of the Standard Conditions and the following additional Specific Conditions as recommended by SEIAA & SEAC in its meetings.

A. Specific Conditions as recommended by SEIAA

1. PP should ensure the implementation of the observations of MOEF & CC RO, Bhopal report dtd 04.04.2019.
2. The entire demand of fresh water should be met through surface water Supply / Indore Municipal Corporation and there should be no extraction of ground water.
3. PP should maintain zero discharge from the Industry as proposed.
 - (a) Separation of High & Low COD values effluent for better management of process effluent.
 - (b) RO treated water will be recycle for the process and High COD effluent generation shall be completely evaporated with help of MEE so as to achieve zero discharge.
4. **For Air Pollution:**
 - a) In plant control measures for checking fugitive emission from all the vulnerable sources shall be provided. Fugitive emission shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator/bag filters and water sprinkling system.

- b) Dust suppression system including water sprinkler system/ foaming arrangement shall be provided at loading and unloading areas to control dust emission.
- c) Fugitive emission in the work zone environment, product, raw material storage areas etc. shall be regularly monitored.
- d) Transportation of raw material and finished goods should be carried out in covered trucks.
- e) For control of fugitive emission and VOCs following steps should be followed:-
 - Chilled brine circulation system shall be provided and it should be ensured that the solvent recovery efficiency will not be less than 98%.
 - Reactor and solvent handling pump shall be provided with mechanical seal to prevent leakage.
 - Closed handling system should be provided for chemicals.
 - System of leak detection and repair of pump/pipeline should be based on preventive maintenance.
 - Solvent shall be taken from underground storage tank to reactor through closed pipeline. Storage tank shall be vented through trap receiver and condenser operated on chilled water.

5. Hazardous Waste:

- (a) PP should ensure disposal of hazardous waste regularly and there should be no dumping of these materials in the premises/outside.
 - (b) Hazardous chemicals should be stored in sealed tanks, drums etc. Flame arrestors shall be provided on tanks. To avoid the spillage from processing unit, Industry shall provide fully mechanized filling and packaging operation unit.
 - (c) PP should provide RCC layer and double layered HDPE lining for primary and secondary leachate collection.
6. PP should obtain NOC /approval from competent authority for health & safety measure, Onsite & Offsite disaster management, and Risk management plan before commencing the operation of the unit.
 7. PP should ensure installation of photovoltaic cells (solar energy) for lighting in common areas, LED light fixtures and energy efficient equipments.

8. Green Belt:

- (a) PP should ensure plantation as proposed in 12344 sq.m sq. m by planting 500 nos of trees of the total plot area and Plantation in the project area of indigenous local varieties like Neem, Peepal, Kadam, Kachnaar etc.
 - (b) Every effort should be made to protect the existing trees on the plot.
 - (c) Green area including thick green-belt shall be developed in the plot area to mitigate the effect of fugitive emissions all around the project area in consultation with the forest department as per the guidelines of CPCB.
9. PP should ensure the implementation of CSR activities to the extent of 16 lakh will be used Infrastructure facilities at schools of nearby villages in terms of provision of computers, teachers, facility of safe drinking water, separate toilets for girls and boys, provision of furniture, additional rooms etc. Skill Development Programmes for youths as per the requirement of the Unit, Plantation and installation of Solar light, at Panda, Rau, Tihi, Shahada, Bhamti, Umri, Nihalpurmunai, Machli Tekri villages.

10. PP should ensure to submit half yearly compliance report and CSR activity report with photographs of plantation in MP-SEIAA. If PP is failed to upload or submit two consecutive half yearly compliance reports of EC conditions to concerned authority (SEIAA and Regional Office, MoEF&CC,Gol,Bhopal) than prior environmental clearance issued to PP will automatically be treated as cancelled/ revoked as per OM No. 930/SEIAA/2019 dated 30.05.2019 issued by MPSEIAA.

B. Specific Conditions as recommended by SEAC -

11. The details of product wise increase from 14 MT/Y to 30 MT/Y are as under:-

List & capacity of Products (Proposed)		Grand Total
Sr. No	Bulk drugs, Drug intermediate & fine chemicals	Capacity (Existing & Proposed) MTPA
A	Non Sterile Products (Proposed)	
1	Betamethasone dipropionate	4
2	Betamethsone sodium phosphate	
3	Betamethasone valerate	
4	Clobetasol propionate	
5	Beclometasonedipropionate	
6	Dtmdmesylate	
7	Halobetasol propionate	
8	Budesonide	
9	Prednisolone acetate	
10	Prednisolone sodium phosphate	
11	Triamcinolone acetonide	
12	Dexamethasone sodium phosphate	
13	Mometasone Epoxide	
14	MometasoneFuroate	
15	Hydrocortisone acetate	
16	Methylprednisolone acetate	
17	Deflazacort	
		8

A	Non Sterile Products (Proposed)	
18	Abiraterone Acetate	4
19	Betamethasone Acetate	
20	Clobetasone Butyrate	
21	Clorprednol	
22	Desonide	
23	Desoximetasone	
24	Dexamethasone	
25	Dexamethasone Acetate	
26	DiflorasoneDiacetate	
27	Drospirenone	
28	Halometasone Monohydrate	
29	Hydrocortisone Hemisuccinate	
30	Hydrocortisone Hydrogen Succinate	
31	HydroxyprogestroneCaproate	
32	Methylprednisolone	
33	Trimicinolone Sodium Phosphate	
34	Betamethasone	
		8

35	FlucinoloneAcetonide		
36	FlumethasonePivolate		
37	Flumethasone	4	8
38	Fluoxymesterone		
39	Fluticasone Furoate		
40	Methylprednisolone Aceponate		
41	Potassium canronoate		
42	Hydrocortisone		
43	Fluticasone propionate		
44	Prednisolone Hemisuccinate		
45	Prednisolone		
46	4 TR / Epoxy triene Acetate		
47	3 TR/ Tetrane Acetate		
48	Fluromethlone		
49	Methyl p0rednisolone Sodium Succinate		
50	Methylprednisolone Hydrogen Succinate		
51	Hydrocortisone Sodium Succinate		
52	Methyl Prednisolone Sodium Succinct for injection USP for manufacturer's use.	12	22
53	Hydrocortisone Sodium Succinate for injection USP for manufacturer's use		
		16 MTPA	30 MTPA

(A) Statutory compliance

12. The project proponent shall obtain Consent to Establish/Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the Madhya Pradesh Pollution Control Board (MPPCB).
13. The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time & permission of competent authority if ant tree falling is to be carried out.
14. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.

(B) Air quality monitoring and preservation

15. The project proponent shall install 24x7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to MPPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.
16. The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognized under Environment (Protection) Act, 1986.
17. The project proponent shall install system to carryout Continuous Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released e.g. PM10 and PM2.5 in reference to PM emission and S02 and NOx in reference to S02 and NOx emissions) within and outside the plant area (at least at four locations

one within and three outside the plant area at an angle of 120° each) covering upwind and downwind directions.

18. To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions from the boiler, DG set and scrubber shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
19. Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
20. The DG sets [1500 KVA (2 Nos.), 500 KVA (2 Nos.), 500 KVA (2 Nos.)] shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.
21. National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.
22. The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be complied with.

(C) Water quality monitoring and preservation

23. The project proponent shall provide 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.
24. As already committed by the project proponent Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises.
25. The net fresh water requirement shall be 22.66 KLD. The rejected water will be reused for floor washing and gardening/green belt. The treated water will be used for cooling towers, floor washing and gardening/green belt.
26. The waste water generation shall be (55.3 KLD) be segregated as high COD/high TDS, Low COD, Low TDS and domestic effluents. The HCOD/HTDS shall be neutralized and sent to stripper followed by MEE and ATFD. LCOD/LTDS effluent shall be treated in ETP with domestic effluent followed by RO system. The treated effluent shall be entirely reused and recycled in cooling tower make-up.
27. The industrial water requirement for the existing project is 56.5 KL per day sourced from surface water supply. Total cumulative waste water generation from existing and proposed unit will be 55.3 KLD and treated in ETP of 100 KLD, RO of 100 KLD and MEE of 15 KL/day respectively.
28. Adhere to 'Zero Liquid Discharge and No industrial effluent from the unit shall be discharged outside the plant premises. PP should also install Internet Protocol PTZ camera with night vision facility along with minimum 05X zoom and data connectivity must be provided to the MPPCB's server for remote operations.
29. The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the Madhya Pradesh Control Board while granting Consent under the Air/Water Act, whichever is more stringent.
30. Total fresh water requirement shall not exceed 22.66 KLD.

31. Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
32. The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.
33. Dedicated power supply shall be ensured for uninterrupted operations of treatment systems.

(D) Noise monitoring and prevention

34. Acoustic enclosure shall be provided to 750, 350, 1000 KVA DG sets for controlling the noise pollution.
35. 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.
36. The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.

(E) Energy Conservation measures

37. The energy sources for lighting purposes shall preferably be LED based.
38. The total power requirements for project will be 4600 KVA. The power will be supplied by Madhya Pradesh Electricity Board.

(F) Waste management

39. Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.
40. As proposed, 90-95% solvent recovery shall be achieved and recovered solvent shall be reused in the process.
41. Hazardous wastes such as spent solvents, organic incinerable wastes/residues, used filter bags, packaging materials, rejected/expired raw materials and off specification/rejected finished products from the manufacturing plants shall be directly sent to CTSDF, Dhar.
42. The Fly ash generated from boilers shall be stored in silos and disposed of through cement manufacturers by bulkers / closed containers and should comply with Fly Ash Utilization Notification, 1999 and as amended subsequently.
43. If any Flammable, ignitable, reactive and non-compatible wastes should be stored separately and never should be stored in the same storage shed.
44. Automatic smoke, heat detection system should be provided in the sheds. Adequate fire fighting systems should be provided for the storage area.
45. In order to have appropriate measures to prevent percolation of spills, leaks etc. to the soil and ground water, the storage area should be provided with concrete floor of inert material or steel sheet depending on the characteristics of waste handled and the floor must be structurally sound and chemically compatible with wastes.
46. Measures should be taken to prevent entry of runoff into the storage area. The Storage area shall be designed in such a way that the floor level is at least 150 mm above the maximum flood level.
47. The storage area floor should be provided with secondary containment such as proper slopes as well as collection pit so as to collect wash water and the leakages/spills etc.

48. Storage areas should be provided with adequate number of spill kits at suitable locations. The spill kits should be provided with compatible sorbent material in adequate quantity.
 49. Recent MSDS of all the chemicals used in the plant be displayed at appropriate places.
 50. Proper fire fighting arrangements in consultation with the fire department should be provided against fire incident.
 51. All the storage tanks of raw materials/products shall be fitted with appropriate controls to avoid any spillage / leakage. Bund/dyke walls of suitable height shall be provided to the storage tanks. Closed handling system of chemicals shall be provided.
 52. Log-books shall be maintained for disposal of all types hazardous wastes and shall be submitted with the compliance report.
 53. Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.
 54. The company 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 vapour recovery system.
 - f. Use of high pressure hoses for equipment clearing to reduce wastewater generation.
- (G) Green Belt**
55. 12344 sq. meter area will be covered with the good green belt and 500 trees will be planted. The green belt of 5-10 m width will be developed mainly along the periphery and road side. Selection of plant species shall be as per the CPCB guide lines in consultation with the State Forest Department.
 56. Peripheral plantation all around the project boundary shall be carried out using tall saplings of minimum 2 meters height of species which are fast growing with thick canopy cover preferably of perennial green nature. PP will also make necessary arrangements for the causality replacement and maintenance of the plants.
- (H) Safety, Public hearing and Human health issues**
57. Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
 58. 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.
 59. The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
 60. Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
 61. Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile

STP, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.

62. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
63. There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.

(I) Corporate Environment Responsibility

64. The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No. 22-65/2017-IA.III dated 1st May 2018, as applicable, regarding Corporate Environment Responsibility.
65. The company shall have a well laid down environmental policy duly approve by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/ forest/ wildlife norms/ conditions. The company shall have defined system of reporting infringements / deviation / violation of the environmental / forest / wildlife norms / conditions and or shareholders /stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.
66. A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly to the head of the organization.
67. Fund should be exclusively earmarked for the implementation of EMP through a separate bank account.
68. The proposed EMP cost is Rs. 658.50 Lakhs as capital and 43.10 Lakhs /year as recurring cost.
69. Under CER activity, Rs.16.0 Lakhs and 3.50 Lakhs /year per year as capital and recurring costs has proposed for different activities.
70. Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.
71. Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

(J) Miscellaneous

72. PP shall be responsible for discrepancy (if any) in the submissions made by the PP to SEAC & SEIAA.
73. The project authorities must strictly adhere to the stipulations made by the MP Pollution Control Board and the State Government.
74. The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.

75. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).
76. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India/ High Courts and any other Court of Law relating to the subject matter.

Standard Conditions:

1. The company shall carry out the HAZOP study and the report shall be submitted to Regional Office of MoEF, Gol at Bhopal.
2. The company shall comply with the CREP guidelines prepared by MPPCB for Bulk Drug Plants.
3. During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixings of accidental spillages with domestic waste and storm drains.
4. Industry should get the Emergency Disaster Management Plan approved by DTSH and should also comply with the provisions made in Public Liability Insurance Act, 1991.
5. All parameters listed in Environmental Monitoring Plan approved by SEAC must be monitored at approved locations and frequencies.
6. The funds earmarked for environmental protection measures shall be kept in separate account and shall not be diverted for other purpose. Year wise expenditure shall be reported to the Regional office of the Ministry of Environment and Forest, Bhopal and MP PCB.
7. All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained (as and when applicable), by the project proponent from the respective competent authorities.
8. The Regional Office, MoEF, Gol, Bhopal and MP PCB shall monitor compliance of the stipulated conditions. A complete set of documents including Environment Impact Assessment Report, Environmental Management Plan, should be given to Regional Office, MoEF, Gol, Bhopal and MP PCB.
9. A copy of the environmental clearance shall be submitted by the Project Proponent to the Heads of the Local Bodies, Panchayat and Municipal Bodies as applicable in addition to the concerned Government Departments / organization responsible for controlling the proposed projects who in turn has to display the same for 30 days from the date of receipt.
10. The project proponent has to strictly follow directions/guideline issued by the MoEF, Gol, CPCB and other Govt. agencies from time to time.

11. The Project Proponent shall advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at web site of the State Level Environment Impact Assessment Authority (SEIAA) website at www.mpseiaa.nic.in and a copy of the same shall be forwarded to the Regional Office, MoEF, Gol, Bhopal and MP PCB.
12. The Project Proponent has to upload soft copy of half yearly compliance report of the stipulated prior environmental clearance terms and conditions on 1st June and 1st December of each calendar year on MoEF & CC web portal - <http://www.environmentclearance.nic.in/> or <http://www.efclearance.nic.in/> and submit hard copy of compliance report of the stipulated prior environmental clearance terms and conditions to the Regulatory Authority also
13. The SEIAA of M.P. reserves the right to add additional safeguard measures subsequently, if found necessary, and to take action including revoking of the environment clearance under the provisions of the Environmental (Protection) Act, 1986, to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manner.
14. These stipulations would be enforced among others under the provisions of Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and control of Pollution) Act 1981, the Environment (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification, 2006.
15. The Ministry or any other competent authority may alter/modify the above conditions or stipulate any further condition in the interest of environment protection.
16. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.
17. Any appeal against this prior environmental clearance shall lie with the Green Tribunal, if necessary, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
18. The prior Environmental Clearance granted for the project is valid for a period of five years as per EIA notification dtd. 14.09.2006.
19. The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM, SO₂, NO_x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
20. The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent 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 EC conditions and shall also be sent to the Regional Office of MoEF.

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Endt No. / SEIAA/ 2019

Dated 28.11.19

Jitendra Singh Raje
(Jitendra Singh Raje)
Member Secretary

Copy to:-

- (1). Principal Secretary, Urban Development & Environment Deptt. 3rd Floor, Mantralaya Vallabh Bhawan, Bhopal.
- (2). Secretary, SEAC, Research and Development Wing Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony Bhopal-462016.
- (3). Member Secretary, Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony, Bhopal-462016.
- (4). The Collector, District Indore, M.P.
- (5). The Commissioner, Municipal Corporation, Indore, MP
- (6). Director, I.A. Division, Monitoring Cell, MoEF, Gol, Ministry of Environment & Forest Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi – 110 003
- (7). Director (S), Regional office of the MOEF, (Western Region), Kendriya Paryavaran Bhawan, Link Road No. 3, Ravi Shankar Nagar, Bhopal-462016.
- (8). Guard file.

Sanjeev Sachdev
(Dr. Sanjeev Sachdev)
Officer-in-Charge