



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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No.: 4102 /SEIAA AC
Date: 22/10/20

To,

M/s Suneeta Chemicals through Partner,
Plot no. 24, Sector- A Industrial area
Sanwer Road, Indore
(M.P) - 452015

Sub:-Case No.5839/2019: Prior Environment Clearance for proposed manufacturing of Bulk Drug & Intermediate at plot no. - 16, 17, 20 & 24, Sanwer Road Industrial area, Sector A District Indore -452015 (M.P) Total plot area of 11445.65 sq.m. Proposed Capacity - 26500kg/month Or 318 MTPA, 29.30kg/day of by-product by Partner, Suneeta Chemicals Plot no. 24, Sector- A Industrial area Sanwer Road, Indore - 452015(M.P) E-mail:suneeta.chemicals@gmail.com Mobile No.- 8878699009 Env. Con.-Creative Enviro Services, Bhopal (M.P.).

Ref: Your application dtd. 24.01.19 received in SEIAA office on 25.01.19

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. The project is proposed for Manufacturing of Bulk Drug & Intermediate with Production Capacity - 26,500 kg/month and 29.30 kg/day of by-product at Plot No. 16, 17, 20 & 24, Sanwer Road, Industrial Area, Sector-A, Indore, (M.P.).The project area lies between latitude 22°45' 12.14" N & longitude 75°50' 52.6" E.
- ii. M/s Suneeta Chemicals is a sister concern of Panchsheel Organics. Parent Company is Panchsheel Organics Limited, which is a reputed API Manufacturer in India. The unit is proposing to stop the production of existing products and introduce new products of bulk drug and API
- iii. The proposed project is covered under 5 (f) category (B) of the schedule of EIA Notification issued by the Ministry of Environment & Forests vide S.O.1533 (E), dtd. 14.09.2006 and its amendments, hence is required to obtain prior EC. In the context of pandemic COVID -19, MoEF&CC, Gol issued a OM vide dated 13.04.2020, for considering the API & Bulk drug Projects as B-2 category.

Case No. 5839/2019

Issued vide letter no. dated

Case No.: To be quoted in registered cases for correspondence

- iv. There is no interstate boundary within 05 km and no National park, Sanctuary and Eco-sensitive areas within 05 km of the project area hence General condition are not attracted.
- v. The existing production capacity is 318 TPA and unit is proposing new range of bulk drug and drug intermediates at same capacity of 318 TPA with 9.669 TPA of by product.

Existing product	
Name of the Product	Quantity in T/Month
Phenyl Acetic acid	5.00
Sodium gas	5.00
Nicotinic acid IP (TECH Grade)	6.00
Methyl Mercuric Acetate	1.00
Chloropropamide	3.00
Toleutamide	1.50
Thiactazone IP	0.5
Chloro Metherice	1.00
Mepro Bamse	1.50
2-Methyl Znipropile	1.00
P.C.B.S.V	1.00
Total	26.5
Total per year	318.00

- vi. Proposed product and production capacity:-

Proposed product		
S.No	Name of the Product	Quantity in Kg/Month
1	Abacavir Sulfate	50
2	Abiraterone acetate	50
3	Acyclovir	500
4	Amiodarone Hydrochloride	500
5	Aprepitant	50
6	Benzathine Benzyl Penicillin	600
7	Bicalutamide	40
8	Calcium Folate	100
9	Capecitabine	200
10	Carboplatin	5
11	Cisplatin	5
12	Cyclophosphamide	75
13	Diltiazem Hydrochloride	1000
14	Docetaxel	5
15	Dorepenem	50
16	Efavirenz	600
17	Emtricitabine	150
18	Entecavir monohydrate	125
19	Ertapenem	50
20	Gefitinib	20
21	Gemcitabine Hydrochloride	50
22	Glimepiride	500
23	Hydrocortisone Acetate	100
24	Hydroxy Urea	500

25	Ifosfamide	50
26	Imipenem	20
27	Irbesartan	50
28	Lamivudine	500
29	Ledipasvir	50
30	Lisnopril Dihydrate	300
31	Luliconazole	100
32	Mebeverine Hcl	500
33	Medroxyprogesterone Acetate	150
34	Mercaptopurine	50
35	Meropenem	1000
36	Mesna	50
37	Methotrexate	50
38	Methyl Prednisolone /Acetate	100
39	Nitrofurantoin	1000
40	Osetlamivir Phosphate	200
41	Pantoprazole Sodium	1000
42	Procaine Hcl	450
43	Procaine Penicillin G	500
44	Progesterone	900
45	Rabeprazole Sodium	600
46	Ranolazine Hcl	100
47	Sofosbuvir	10
48	Solifenacin	50
49	Tazobactam+Piperacillin	200
50	Tenefovir Disoproxil Fumarate	50
51	Teneligliptin Penta Hydro bromide Hydrate	20
52	Testosterone & Salts	1200
53	Tradazone Hydrochloride	300
54	Valacyclovir Hydrochloride Monohydrate	1000
55	Valsartan	2000
56	Verapamil Hydrochloride	1000
57	Vitamin C (Ascorbic Acid)	1000
58	Voriconazole	100
59	Zodovidine	500
60	Carbamezapine	3000
61	Impiramine Hcl/Pamoate	1000
62	Praziquintal	500
63	Acamprosate Calcium	300
64	Homotorine	1000
65	Triamcilone /Acetonide	20
66	Estradiol & Derivatives	25
67	Clotrimazole	100
68	Dutristride	10
69	Tepentalol	20
70	Rosuvastitin	50
	Total	318 TPA or 26500 Kg per month

By product		
Name of the Product	Name of the By-Product	Quantity In Kg/Day
Cyclophosphamide	TEA HCl	12.30
Zidovudine	Trityl alcohol	17.00

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- vii. The project is proposed in the company's existing premises having land of 11445.65 sq mt, PP has submitted amended lease deed dtd 31.10.10 executed between GM, District Trade and Industries Centre, Indore & M/s Suneeta Chemicals through Partner Shri Mahendra Turkhia, for lease period 30 years.
- viii. The major facilities will be involved as Boiler, MEE, Reactors, Cooling Towers, Effluent Treatment Plant (ETP), and R.O Plant Facilities like administrative office, parking and greenbelt/plantation will also be developed as per plan/requirement.
- ix. The total water requirement for the project will be approx. 63 KLD and after recycling/reuse, the net fresh water consumption will be 50 KLD which will be sourced from AKVN water supply. Total waste water generation from proposed unit will be 19 KLD and treated in ETP of 30 KLD, RO of 15 KLD, MEE of 10KL/day respectively. 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.
- x. Following are the EMP planned for existing and proposed activities of the plant
- Storm water drainage system will be developed and shall be maintained preciously to prevent the flow of silt and other contaminant outside of the site
 - Blow downs from cooling towers, boiler, scrubber, Softener regeneration, Vacuum pump approx 39 KL will go to ETP
 - 4.92 KLD high COD high TDS wastewater will be sent to MEE. Remaining 6.08 KLD out of 11 KLD will be treated in ETP.
 - The entire trade effluent will be divided into two streams i.e. Stream-I (high concentrated streams) and Stream-II (low concentrated stream). Both the streams will be treated in well-designed ETP, RO and MEE.
 - A drain along the boundary wall shall be made, which will be connected proposed settling tank to protect the flow of contaminant towards nearby area
 - Regular monitoring and analysis of river is proposed .
 - Being a chemical based plant, it is proposed to harvest the rain water only form the building roof top.
 - Recycling of 19 KLD water is proposed from where 13 KLD condensate will be recovered, which reduces the fresh water demand.
 - No treated / untreated effluent would be discharged on land in Industrial premises or study area.
- xi. Solid waste generated during the manufacturing process and wastewater treatment process is mainly sludge and will be disposed at authorized TSDF facility as per Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2008 (Amendment 2016).

Hazardous Waste Management				
S. No	Name of the Hazardous Waste	Quantity	Disposal Method	
1	Organic waste (Process Residue)	200.00 Kg/Day	Sent to Cement Industries	
2	Spent Carbon	50.00Kg/Day	Sent to Cement Industries	
3	Solvent Distillation Residue	140.00 Kg/Day	Sent to Cement Industries	
4	Inorganic Waste	40.00 Kg/Day	Sent to TSDF	
5	ETP Sludge	50 .00Kg/Day	Sent to TSDF	
6	MEE Salts	388 .00Kg/Day	Sent to TSDF	

7	Organic Evaporative Liquid (from MEE Stripper)	0.150 KLD	Sent to Cement Industry
8	Used Oils	1060L/Annum	SPCB Authorized Agencies for Reprocessing/Recycling
9	Detoxified Containers	500 No's / Month	After Detoxification sent to outside agencies.
10	Used Lead Acid Batteries	2 No's/ Annum	Send back to suppliers for buyback of New Batteries

- Disposal of hazardous waste on regular basis shall be ensured and there should be no dumping of these materials in the premises/outside.
 - Hazardous chemicals shall 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.
 - RCC layer and double layered HDPE lining for primary and secondary leachate collection shall be provided.
 - Flammable, ignitable, reactive and non-compatible wastes should be stored separately and never should be stored in the same storage shed.
 - 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.
 - 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.
- xii. At present the total connected load of power is about 250 KVA. In case of power failure, D.G. set (250 KVA) will be used as a backup power source.
- xiii. 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:
- 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.
 - Bag Filters and venturi scrubber are proposed as per the requirement and nature of pollutant.
 - Online monitoring system for the pollutants from the stacks with an arrangement to reflect gaseous emission parameters on company's server shall be provided.
 - Transport vehicles will be properly maintained to reduce air emissions. Vehicles will be periodically checked for pollutant emissions against stipulated norms.
 - Development of green belt in time bound manner in consultation with forest department.
 - Provision of enclosure for all the loading & unloading operations, if possible.
 - Regular maintenance of air pollution control equipment.
 - Regular monitoring of VOC, concentration in work zone
 - Better process control shall also help to keep the emission within the limit
 - Alkaline Scrubber will be attached to the reactor vent to control process SO2 emission.
 - In order to control the fugitive dust emissions due to transportation activity, all the operational roads within the plant area shall be asphalted.
 - Regular maintenance of vehicles and machinery in order to control emissions
 - A good housekeeping and proper maintenance will be practiced in the industry

- xiv. The plantation and green belt is developed in 1637 sq. m area by planting 430 nos. of plants. At present green belt is developed around the plant site with suitable plant species.
- xv. PP has included Disaster Management plan in the EIA Report. For firefighting measure PP has provided Fire extinguishers and Fire Hydrants at project site.
- xvi. PP has proposed the rain water from the building roof will be directed through the drainage to the covered storm water drainage line. All drainage system will be concreted lined and located along the roads up to rain water harvesting pit. Roof top rain water will be collected in tanks and reused after filtration as per requirements.
- xvii. The total fixed cost of proposed expansion project will be INR 7.0 Crore.
- xviii. As part of CER activity PP has proposed to provide Infrastructure development at School in nearby villagers with Budgetary Provision of 07 lakh..

Proposed CER Programme with Budgetary Provision				
S. no	Need Identified For CSR Plan	Activities	Budgetary Provision (Capital) (Rs. In lacs)	Time Frame
1	Infrastructure development at School	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 for school Kabirkheri	Rs . 2.50 Lac	Within 01 years
2	CER activities wrt COVID-19	Provision of <ul style="list-style-type: none"> • Large Sanitizers equipments • Oximeters for pulse checking, • Thermal sensors, and • PPE suits to medical officers of hospital at Covid hospitals and schools at Indore 	Rs 2.50	Immediately after Clearance
3	Facilitation work for implementation of programme under Jal Jivan Mission	Contribution of fund or execution of plumbing network for implementation of Jal Jivan Scheme either to villagers houses or at school in at Khaupura, and Kabirkheri and Aganwadi etc. in consultation with the local administration.	2.0	
Total			7.0 Lacs	

Based on the information submitted at Para i to xxiii above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 640th meeting held on 01.10.2020 and decided to accept the recommendations of 433rd SEAC meeting held on dtd. 19.05.20

Hence, Prior Environmental Clearance is accorded under the provisions of EIA notification dtd. 14th September 2006 & its amendments for the Proposed Manufacturing of Bulk Drug & Intermediate at plot no. - 16, 17, 20 & 24, Sanwer Road Industrial area, Sector A District Indore -452015 (M.P) Total plot area of 11445.65 sq.m. Proposed Capacity – 26500kg/month Or 318 MTPA, 29.30kg/day of by-product by Partner, Suneeta Chemicals Plot no. 24, Sector- A Industrial area Sanwer Road, Indore - 452015(M.P), 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. The entire demand of fresh water should be met through MPAKVN. Fresh water should not be used for Irrigation and gardening purpose.
2. **Waste water:**
 - (a) PP should ensure "Zero effluent discharge" from the unit by 100% recycling. The water softening reject, boiler blow down reject and cooling blow down will be treated in ETP. Further treated waste water will go through the RO and finally re used / recycled in the process and unused waste water evaporates in MEE.
 - (b) RO and MEE should be provided for treatment of high COD waste streams and only in case of emergency/breakdown high COD wastes should be disposed off through CTSDF, Pithampur, Dhar.
3. **For Air Pollution:**
 - (a) PP should ensure regular Stack monitoring & ambient air quality monitoring and should be carried out as per the guidelines/norms of MPPCB/CPCB.
 - (b) 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.
 - (c) Company shall carry out the HAZOP study and report shall be submitted to ministry MoEF & CC Regional Office, Bhopal.
 - (d) 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 is not be less than 95%.
 - Reactor and solvent handling pump shall be provided with mechanical seal to prevent leakage.
 - 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.
4. **Hazardous Waste Management:**
 - (a) As proposed above, PP should ensure disposal of hazardous waste regularly and there should be no dumping of these materials in the premises/outside.
 - (b) PP should ensure handling, disposal and management of hazardous waste as per the related prescribed rules.
 - (c) PP should obtain Renewal of authorization regularly from MPPCB for collection storage and disposal of hazardous waste (Management, handling & transboundary Movement) Rules 2008 and its amendments. Membership of the TSDF should be obtained for hazardous waste disposal.
 - (d) 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.
5. **Green Belt Development:**
 - (a) PP should ensure plantation as proposed 1637.50 sq mt of area with 430 number of trees Plantation in the project area of indigenous local varieties like Neem, Peepal, Kadam and Kachnaar.
 - (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 at least 33% of the plot area to mitigate the effect of fugitive emissions all around the plant in consultation with the forest department as per the guidelines of CPCB.

6. PP should ensure the implementation of CER activities to the extent of Rs. 7.0 lakh as committed during presentation on regular basis in consultation with Collector, Indore
7. Total quantity of runoff water generated and green belt area should be collected in underground tank & used for process in plant to minimize fresh water requirement.
8. All other conditions as laid in the consents of MPPCB shall be applicable.
9. PP should ensure to submit half yearly compliance report and CER 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

(A) Statutory compliance

- i. 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).
- ii. 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.
- iii. 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

- i. 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.
- ii. 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.
- iii. 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 SO2 and NOx in reference to SO2 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.
- iv. 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.

- v. Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- vi. The DG sets (1 X 250 KVA) 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.
- vii. The boilers shall be provided with bag filter to control the emission limit as prescribed by MPPCB and maintained its efficiency.
- viii. 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.
- ix. 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

- i. The project proponent shall provide online continuous monitoring of effluent (if applicable), the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
- ii. As already committed by the project proponent Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises.
- iii. The net fresh water requirement shall be 50 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.
- iv. The waste water generation shall be (19 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.
- v. The industrial and domestic water requirement for the proposed project is 63 KL per day sourced from surface water supply. Total waste water will be treated in ETP of 30 KLD, RO of 15 KLD and MEE of 10 KL/day respectively.
- vi. 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.
- vii. 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.
- viii. Total fresh water requirement shall not exceed 50 KLD.
- ix. 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.
- x. 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.

- xi. Dedicated power supply shall be ensured for uninterrupted operations of treatment systems.

(D) Noise monitoring and prevention

- i. Acoustic enclosure shall be provided to DG (1 X 250KVA) set for controlling the noise pollution.
- ii. 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.
- iii. 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

- i. The energy sources for lighting purposes shall preferably be LED based.
- ii. The total power requirements for project will be 250 KVA. The power will be supplied by Madhya Pradesh Electricity Board. Furnace Oil Consumption 25 lit/hours (Source Indigeneous)

(F) Waste management

- i. 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.
- ii. As proposed 95% solvent recovery shall be achieved and recovered solvent shall be reused in the process.
- iii. 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.
- iv. 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.
- v. If any Flammable, ignitable, reactive and non-compatible wastes should be stored separately and never should be stored in the same storage shed.
- vi. Automatic smoke, heat detection system should be provided in the sheds. Adequate fire fighting systems should be provided for the storage area.
- vii. 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.
- viii. 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.
- ix. 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.
- x. 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.

- xi. Recent MSDS of all the chemicals used in the plant be displayed at appropriate places.
- xii. Proper fire fighting arrangements in consultation with the fire department should be provided against fire incident.
- xiii. 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.
- xiv. Log-books shall be maintained for disposal of all types hazardous wastes and shall be submitted with the compliance report.
- xv. 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.
- xvi. 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:

- i. The green belt of 5-10 m width shall be developed in 1637.50 sq. meters within plant with the 427 number in the project area, mainly along the plant periphery, in downward wind direction and along road sides etc. Selection of plant species shall be as per the CPCB guide lines in consultation with the State Forest Department.
- ii. 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. As proposed in the EIA 427 no's trees (327+100 no) in four years shall be planted. PP will also make necessary arrangements for the causality replacement and maintenance of the plants.

(H) Safety, Public hearing and Human health issues

- i. Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- ii. 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.
- iii. The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
- iv. 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.
- v. 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.

- vi. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- vii. 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

- i. 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.
- ii. The company shall have a well laid down environmental policy duly approved 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.
- iii. 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.
- iv. Fund should be exclusively earmarked for the implementation of EMP through a separate bank account.
- v. The proposed EMP cost is Rs.300.0 Lakhs as capital and 7.72 Lakhs /year as recurring cost.
- vi. Under CER activity, Rs. 7.0 Lakhs and 0.50 Lakhs /year as capital and recurring costs has proposed for different activities.
- vii. 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.
- viii. Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

(J) Miscellaneous

- i. PP shall be responsible for discrepancy (if any) in the submissions made by the PP to SEAC & SEIAA.
- ii. The project authorities must strictly adhere to the stipulations made by the MP Pollution Control Board and the State Government.
- iii. 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.
- iv. 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).
- v. 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. Any change in the correspondence address be duly intimated to all the regulatory authority within 30 days of such change.
15. 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.
16. The Ministry or any other competent authority may alter/modify the above conditions or stipulate any further condition in the interest of environment protection.
17. 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.
18. 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.
19. The prior Environmental Clearance granted for the project is valid for a period of seven years as per EIA notification dtd. 14.09.2006 & its amendments.
20. 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.
21. 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.

(Tanvi Sundriyal)
Member Secretary

4103
Endt No. / SEIAA/ 2020
Copy to:-


Dated 22.10.2020

Case No. 5839/2019

Issued vide letter no. dated

Case No.: To be quoted in registered cases for correspondence

- (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). Managing Director, M.P. Audyogik Kendra Vikas Nigam (Indore) Limited, Free Press House First Floor, 3/54 Press Complex, Agra-Mumbai Highway Indore (M.P).
- (6). Director, I.A. Division, Monitoring Cell, MoEF, GoI, 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.


(Dr. Sanjeev Sachdev)
Officer-in-Charge

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Case No. 5839/2019

Issued vide letter no. dated

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