



Government of India
Ministry of Environment, Forest and Climate Change
(Issued by the State Environment Impact Assessment
Authority(SEIAA), Madhya Pradesh)

To,

The Director
SIDDHANTA PHARMA PRIVATE LIMITED
M-156, Gautam Nagar, Bhopal (MP) -462023

Subject: Grant of Environmental Clearance (EC) to the proposed Project Activity under the provision of EIA Notification 2006-regarding

Sir/Madam,

This is in reference to your application for Environmental Clearance (EC) in respect of project submitted to the SEIAA vide proposal number SIA/MP/IND3/246320/2021 dated 29 Dec 2021. The particulars of the environmental clearance granted to the project are as below.

- | | |
|--|---|
| 1. EC Identification No. | EC22B021MP110576 |
| 2. File No. | 8879/2021 |
| 3. Project Type | New |
| 4. Category | B2 |
| 5. Project/Activity including Schedule No. | 5(f) Synthetic organic chemicals industry (dyes & dye intermediates; bulk |
| 6. Name of Project | 200T per month of API / pharmaceutical intermediates products |
| 7. Name of Company/Organization | SIDDHANTA PHARMA PRIVATE LIMITED |
| 8. Location of Project | Madhya Pradesh |
| 9. TOR Date | N/A |

The project details along with terms and conditions are appended herewith from page no 2 onwards.

Date: 15/02/2022

(e-signed)
Shriman Shukla
Member Secretary
SEIAA - (Madhya Pradesh)

Note: A valid environmental clearance shall be one that has EC identification number & E-Sign generated from PARIVESH. Please quote identification number in all future correspondence.

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PARIVESH

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Ref: Proposal No. SIA/MP/IND3/246320/2021, Case No 8879/2021: Prior Environment Clearance for proposed Manufacturing of API-Bulk Drug & Intermediates with production capacity of 200 Ton per month (2400 TPA) at Plot No. UD-2, Village - Chirakhan, Pithampur Industrial Area, AKVN, Near Ramkey, Tehsil - Depalpur, Dist. Dhar (MP) Plot area- 30620 sq.m. by M/s Siddhanta Pharma Pvt. Ltd, Dr. Subodh Varshney, M-156, Gautam Nagar, Dist. Bhopal, MP - 462023 Email: subodhvarshney@rediffmail.com Ph: 09826078994 Env. Consultant: Creative Enviro Services

With reference to 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 -2, pre-feasibility report, EMP report, ppt and additional clarifications furnished in response to the 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 API-Bulk Drug & Intermediates production capacity of 2400 TPA (200 Tonne per month) at Plot No. UD-2, Village - Chirakhan, Pithampur Industrial Area, AKVN, Near Ramkey, Tehsil - Depalpur, Dist. Dhar (MP) The project proponent is M/s. Siddhanta Pharma Pvt Ltd (SPPL)
- ii. 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, Gov's MoEF&CC issued Notification dtd. 27.03.2020 and further amendments dtd.16.07.21 for considering the API & Bulk drug Projects as B-2 category.
- iii. There is no interstate boundary within 05 km and no National park, Sanctuary and Eco-sensitive areas within 05 km of the project area (DFO letter dtd, 17.12.21) hence General condition are not attracted.
- iv. The case was discussed in 540th SEAC meeting dated 08.01.2022 and is recommended for grant of prior EC subject to special conditions.
- v. The project occupies a plot Area of 30620 m² of land. Regarding land documents PP has submitted registered lease deed dated. 24.06.2021 executed between MPIDC regional office, Indore and M/s Siddhanta Pharma Pvt Ltd. The land use breakup of the project area is as follows:-

S. No.	Particular/Purpose	Area (Sq. M.)	% of land
1.	Build up Area production block	5600	18.29%
2.	RM store	1200	3.92%
3.	Finished good /QA QC area	555	1.81%
4.	Admin block/Canteen	555	1.81%
5.	Utility /Auxiliary	1332	4.35%
6.	ETP/MEE	700	2.63%
7.	Internal Road	5340	17.44%
8.	Green belt	10528	34.38%
9.	Open land	4810.75	15.71%
Total Area		30620	100.00%

- vi. Proposed production capacity of API/Bulk Drug & Intermediates will be 2400 TPA as follows:-

Group No.	Sr. No	Chemical Name of the product	CAS No.	Qty (TPA)	Type/Category of Product	End Use
		Anti Diabetic Drug & Intermediate				
A	1	Alogliptin	850649-62-6	250	API	Anti diabetic drug
	2	Canagliflozin	842133-18-0		API	Treatment of diabetes
	3	Empagliflozine	864070-44-0		API	treatment of type 2 diabetes
	4	Gliclazide	21187-98-4		API	treatment of type 2 diabetes
	5	Glimepride	93479-97-1		API	Anti dibetic
	6	Vildagliptin intermediate and	274901-16-5.		API	antidiabetic agent
	7	Sitagliptin	486460-32-6		API	Antihypoglycemic
	8	Saxagliptin	361442-04-8		API	hypoglycemic
	9	Teneligliptin	1572583-29-9		API	antidiabetic agent
	10	Voglibose	83480-29-9		API	Antidibetic
	11	Dapagliflozin	461432-26-8		API	Anti-dibetic
	12	pioglitazone	111025-46-8		API	Anti-dibetic
	13	Linagliptin	668270-12-0		API	Anti-dibetic
	14	Semaglutide	910463-68-2		API	Anti-dibetic
		Hypertensive / blood pressure Drug and Intermediate				
B	1	Valsartan	37862-53-4	250	API	Treatment of hypertension
	2	Chlorthalidone and intermediate	77-36-1		API	Slowing the production of cholesterol
	3	Rosuvastatin Calcium	147098-20-2		API	anti-hypertensive
	4	cilnidipine	132203-70-4		API	High Blood Pressure
	5	Olmesartan	144689-63-4		API	For pulmonary arterial hypertension
	6	Ambrisentan	177036-94-1		API	To treat high blood pressure
	7	Telmisartan	144701-48-4		API	To treat high blood pressure
	8	Ramipril	87333-19-5		API	To treat high blood pressure
	9	Benidipine	91599-74-5		API	To treat high blood pressure
	10	Torsemide	56211-40-6		API	To treat high blood pressure
	11	Lisinopril	83915-83-7		API	To treat high

Group No.	Sr. No	Chemical Name of the product	CAS No.	Qty (TPA)	Type/Category of Product	End Use
						blood pressure
C		Antiviral Drug & Intermediate		100		
	1	Abacavir sulphate and Intermediate	188062-50-2		API	Antiviral Drug
	2	Dolutegravir	1051375-16-6		API	Antiviral Drug
	3	Ritonavir	155213-67-5		API	Antiviral Drug
	4	Sofosbuvir	1190307-88-0		API	Antiviral Drug
	5	Tenofovir	202138-50-9		API	Antiviral Drug
	6	Rilpivirine	500287-72-9		API	Antiviral Drug
	7	Favipiravir	259793-96-9		API	Antiviral Drug
		Darunavir	206361-99-1	API	Antiviral Drug	
D		Other Drug & Intermediate		1600		
	1	Tamsulosin hydrochloride	106463-17-6		API	prostate gland treatment
	2	Citicoline Sodium	33818-15-4		API	To treat Memory loss due to aging .
	3	Clopidogrel Bisulphate	120202-66-6		API	used to treat the symptoms of acute coronary syndrome such as a stroke
	4	Etorocoxib	202409-33-4		API	Anti inflammation due to rheumatoid arthritis, psoriatic arthritis, osteoarthritis, ankylosing spondylitis
	5	Levosulpiride.	23672-07-3		API	Antipsychotic for nausea, vomiting
	6	Luliconazole	187164-19-8		API	Antifungal
	7	Rifaximin	80621-81-4		API	Antibiotic
	8	Benfotiamine	22457-89-2		API	medication or dietary supplement to treat diabetic neuropathy.
	9	Montelukast	158966-92-8		API	Anti asthma & allergic rhinitis
10	Rifampicin	13292-46-1	API	Anti TB		

Group No.	Sr. No	Chemical Name of the product	CAS No.	Qty (TPA)	Type/Category of Product	End Use
	11	Mycophenolate	24280-93-1		API	immunosuppressant
	12	Sevelamer	52757-95-6		API	used to treat hyperphosphatemia
	13	Naproxen	22204-53-1			inflammatory diseases
	14	Jacobsen,s catalyst (N, N'-bis-1,2-cyclohexanediaminomanganese(III) chloride,)	138124-32-0		Intermediate	
	15	Bicyclo ketone	74288-40-7		Intermediate	Imipenam (API) Intermediate
	16	Para nitro benzyl Bromide	100-11-8		Intermediate	Drug Intermediate
	17	5-Dicarboxylic acid	570-22-9		Intermediate	Drug Intermediate
	18	Theophylline	58-55-9		API	used in therapy for respiratory diseases
	19	Salicylic acid	69-72-7		API	used to treat warts, skin tags, calluses, psoriasis, dandruff, acne
	20	1,1-cyclohexane-diacetic acid & 1,1-cyclohexane-diacetic acid monoamide	99189-60-3		Intermediate	Gabapentin Drug intermediate
	21	Paracetamol	103-90-2		API	Fever and pain
	22	Cyanoacetic acid	372-09-8		Intermediate	Pharmaceutical drug Intermediate
	23	Beta Naphthol	135-19-3		Intermediate	Pharmaceutical drug Intermediate
	24	Azithromycin	83905-01-5		API	Antibiotic drug
	25	Gabapentin	60142-96-3		Intermediate	used to treat partial seizures and neuropathic pain
	26	Ascorbic acid	50-81-7		API	Vitamin C
	27	Methylcobalamin	13422-55-4		API	Vitamin
	28	cyanocobalamin	130209-82-4		API	Vitamin
	29	Thiamine	155206-00-1		API	Vitamin B1
	30	Riboflavin	157283-68-6		API	Vitamin B2
	31	Vitamin K27	494-19-9		Intermediate	Vitamin K2
	32	Vitamin K1	32943-25-2		Intermediate	controlling

Group No.	Sr. No	Chemical Name of the product	CAS No.	Qty (TPA)	Type/Category of Product	End Use
					diate	binding of calcium in bones and other tissues
	33	Ketamine	33948-22-0		Intermediate	Anesthetic
	34	Alprazolam	4698-11-7		Intermediate	anti-anxiety
	35	Diazepam	298-46-4		API	Anticonvulsants
	36	Aripiprazole	28721-07-5		API	antipsychotic
	37	Risperidone	303-49-1		API	antipsychotic
	38	N-methyl 2-pyrrolidone	113-52-0		Intermediate	Drug Intermediate
	39	Oxytetracycline	79-57-2		API	Antibiotic
	40	Ferrous ascorbate	24808-52-4		API	Vitamin
	41	Vitamin D3	67-97-0		API	Vitamin
	42	Pyridostigmine Hydrochloride	155-97-5		API	treatment of myasthenia gravis and congenital
	43	Bronopol	52-51-7		API	antimicrobial
	44	Citrimide poder	8044-71-1		API	antiseptic
	45	benzalkonium chloride	63449-41-2		API	antimicrobial
	46	Chlorhexadine gluconate	55-56-1		API	used for skin disinfection before surgery
	47	Povidone Iodine	25655-41-8		API	antiseptic used for skin disinfection before and after surgery
	48	cetyltrimethylammonium chloride	112-02-7		API	topical antiseptic
	49	N,N-diethyl-2-chloro ethyl amine hydrochloride.	99 869-24-9		intermediate	Intermediate of cyproheptadine
	50	Matebromo Anisole	104-92-7		Intermediate	Intermediate of Tramadol Hcl
	Anticancer Drug and Intermediate			100		
E	1	Capacitabine	154361-50-9		API	Anticancer
	2	Dasatinib	302962-49-8		API	Anticancer
	3	Emtricitabine	143491-57-0		API	Anticancer
	4	Enzalutamide	915087-33-1		API	Anticancer
	5	Becolutamide	90357-06-5		API	Anticancer
	6	Cytarabine	147-94-4		API	Anticancer
	7	<i>Doxorubicin</i>	23214-92-8		API	Anticancer
	8	Geftinib	184475-35-2		API	Anticancer

Group No.	Sr. No	Chemical Name of the product	CAS No.	Qty (TPA)	Type/Category of Product	End Use
	9	Imatinib Mesylate	152459-95-5	100	API	Anticancer
	10	Oxaliplatin	63121-00-6		API	Anticancer
	11	carboplatin	41575-94-4		API	Anticancer
	12	Cisplatin	15663-27-1		API	Anticancer
F		Rituximab	174722-31-7	100	API	It is usually used to treat rheumatoid arthritis and osteoarthritis.
		Avacopan	1346623-17-3		API	It is used to treat a certain type of arthritis (psoriatic arthritis).
		Process Development and Research Product			API	
TOTAL			--	2400TPA	--	--

vii. Salient feature of the Project :-

S.N.	Component	Status
1	Online Proposal no.	SI/MP/IND3/246320/2021
2	Google Co-ordinates	Latitude: 22° 38'02.4"N Longitude: 75°41'05.5E
3	Environment Sensitive area from the project site	Nearest National Highway- NH-47 7.9 K.M Nearest city Indore 27 K.M. Nearest Village Chirakhan 2.5 Km Nearest Airport Indore Airport 25.0 Km Nearest Railway station Mhow 8.0 Km Nearest River Sarswati 12.0 Km Archaeological Site None within 10km radius National Park / Wild Life Sanctuary / Marine Sanctuary - None within 10km radius Seismicity Seismic Zone-II
4	Major facilities proposed in the unit	Boiler, MEE, Reactors, Cooling Towers, Effluent Treatment Plant (ETP), and R.O Plant. Facilities like administrative office, parking and greenbelt/plantation.
5	Water Requirement	Total raw water requirement for the proposed project will be 115 KLD fresh and after recycling of 48 KLD, the fresh water requirement will be 67 KLD. The water will be sourced from AKVN Pithampur (MP)
6	Wastewater generation	The total wastewater (59 KLD) generation from the domestic source will be 8 KLD and industrial wastewater generation will be 51 KLD. Process effluent will be segregated into concentrated effluent stream 20 KLD and normal effluent stream (31 KLD).
7	Power Requirement	The total requirement will be 1200 KW. In case of power failure, D.G. of 1000 KVA and 500 KVA will be used as a backup power source. Power will be sourced from existing line of 'Madhya Pradesh Madhya Kshetra Vidyut Vitaran Company'.

8	Fuel Requirement	Briquette/Coal for Boilers (2 TPH) Agro Briquette (6 T/day) Briquette/Coal for Boilers (3 TPH) Agro Briquette (8 T/day)
9	Proposed Steam Boiler	3.0TPH Agro Waste /Briquette 2.0 TPH Agro Waste /Briquette
10	Project Cost	The total capital cost for environmental measures is kept as Rs. 175 Lacs (capital cost) is allocated for environmental management systems and the annual recurring cost for the same is Rs 96.30 Lacs
11	Green belt Area	approx. 33 % land area is allocated for green belt. The green belt of 5-10 m width shall be developed 10528 sq. meter within and periphery of plant (2200 no), in downward wind direction and along road sides etc
12	CER	The proposed CER cost will be 15.0 lacs which will be incurred on skill training development programme. PP shall be conduct CER programme as skill development activity in coordination with of ITI for which budgetary of 10.60 lakhs has been made at Sardarpur & adjoining area and Water facility shall be provided in the Ralamandal Wild Life Sanctuary, Indore for which 04.0 lakhs has been allocated .

viii. Proposed Environmental Measures:

A Storm Water & Waste Water Management

- Storm water drainage system shall be developed and shall be maintained preciously to prevent the flow of silt and other contaminant outside of the site
- 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
- Storm water drainage system will be developed for unit and shall be maintained preciously to prevent the flow of silt and other contaminant outside of the site.
- Blow downs from cooling towers, boiler, ACF/MGF Cleaning, Softener regeneration, Vacuum pump will go to ETP
- Water harvesting structure need to provide further strength with proper maintenance
- 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.
- The treated effluent will be reused/ recycled and the RO reject (will be sent to above stated MEE followed by ATFD. Thus, unit will maintain Zero discharge.
- High COD / TDS wastewater (consisting process effluent) will be sent to MEE/ATFD. Condensate will be reused and bottom salt will be sent to a common TSDF site.
- Utilization of treated wastewater In toilet flushing, greenbelt development and dust suppression

B Air Pollution control Measures

Air pollutants, such as carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic compounds (VOCs), heavy metals, and respirable particulate matter (PM_{-2.5} and PM₋₁₀), differ in their chemical composition, reaction properties,

emission, time of disintegration and ability to diffuse in long or short distances. For control of air pollution PP has proposed as follows:

- Provision of regular monitoring of air polluting concentrations.
- Provision of pollution control equipments at all point of emission
- All tankers shall be PUC Certified from time to time.
- DG Sets will be operated during power failure.
- Traffic management will be made and ensured that the same is followed.
- Greenbelt will be developed at the facility to mitigate the impact of pollution.
- Attenuation of pollution/ protection of receptor through greenbelt/green cover.
- FLIR Systems will be installed and fielded a passive IR imager capable of standoff leak detection of Volatile Organic Compounds (VOCs)

S. No.	Stack Attached to	Stack Height (m)	Dia of stack at top(m)	Temp. of exhaust gases (°C)	Exit Velocity (m/sec)	APC M	Pollutant Emission Rate (mg/Nm ³)		
							SPM	SO ₂	NOx
Estimated Emission from stack									
1	Boilers (Coal/ Bio-coal/FO) 3 TPH	36	0.45	160	8.5	Bag Filter Green belt	<95	<12	<15
2	Boiler 2 TPH Coal/FO	30	0.3	160	8.5		<95	<12	<15
3	DG Set 1000 kVA (Standby)	11	0.225	210	15.0	stack	<100	<25	<30
4	DG Set 500 kVA (standby)	11	0.225	210	15.0	stack	<100	<25	<30

C: Solid & Hazardous waste Management

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). PP has submitted he will take authorization Under Hazardous Waste (Management, Handling & Transboundary Movement), Rules.

D : Probable Odor Sources and Control/ Mitigation Measures

Probable Odor Source	Control/ Mitigation Measures
Point sources are confined emissions from vents, stacks and exhausts.	<ul style="list-style-type: none"> • Wet scrubbing system will be provided to remove odor involve either absorption in a suitable solvent or chemical treatment with a suitable reagent. Hot, moist streams will be cooled before the contact scrubbing solutions. • Double condenser system will be provided before absorption system/scrubber that normally uses water or air to cool and condense a vapor stream. • Green belts are used to form a surface capable of sorbing and forming sinks for odorous gases. Leaves with their vast area in a tree crown, sorbs pollutants on their surface, thus effectively reduce their concentrations in the ambient air and source emissions • Greenbelt development plan details are given.

<p>odour emissions from loading and unloading of raw material (low molecular weight and high vapour pressure) to storage tanks, from valves, compressors, pumps flanges etc.</p>	<ul style="list-style-type: none"> ◦ Regular monitoring of the stack emission of proposed scrubber shall be carried out. ◦ Transport vehicles will be properly maintained to reduce air emissions. Vehicles will be periodically checked for pollutant emissions against stipulated norms. ◦ Idle running of vehicles will be minimized during material loading/unloading operations. ◦ Water sprinkling along the internal road and around premises.
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Based on the information submitted at Para i to viii above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 703rd meeting held on 30.01.2022 and decided to accept the recommendations of 540th SEAC meeting held on dated 08.01.2022.

Hence, Prior Environmental Clearance is accorded under the provisions of EIA Notification dtd. 14th September 2006 & its amendments to the proposed Manufacturing of API-Bulk Drug & Intermediates with production capacity of 200 Tonne per month (2400 TPA) at Plot No. UD-2, Village - Chirakhan, Pithampur Industrial Area, AKVN, Near Ramkey, Tehsil - Depalpur, Dist. Dhar (MP) by M/s Siddhanta Pharma Pvt. Ltd, Dr. Subodh Varsheny, M-156, Gautam Nagar, Dist. Bhopal, MP - 462023 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 MPIDC (letter dtd. 23.11.21) Indore (MP). PP should ensure to incorporate with MPAKVN Pithampur for processing the water supply as directed in letter dtd. 23.11.2021.
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) 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 Briquette/Coal for use in Briquette/Coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions from the boiler, DG set shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.

- (e) PP to explore possibility to use briquettes as a fuel to the boiler instead of coal to reduce Global Warming Potential.
- (f) 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) Solid waste generated during the manufacturing process and wastewater treatment process is mainly sludge and should be disposed at authorized TSDF facility, as per Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2008 (Amendment 2016).
- (c) PP should obtain the Membership from CHW-TSDF-Pithampur for disposal of Hazardous waste.

5. **Green Belt Development:** PP should ensure plantation as proposed 10528 sq. m (34%) with 2200 number of trees with native tree species in accordance with CPCB guidelines. The greenbelt shall inter alia cover the entire periphery of the plant.
6. PP should ensure the proposed CER cost will be 15.0-lacs which will be incurred on skill training development programme. PP shall be conduct CER programme as skill development activity in coordination with of ITI for which budgetary of 10.60 lakhs has been made at Sardarpur & adjoining area and Water facility shall be provided in the Ralamandal Wild Life Sanctuary, Indore for which 04.0 lakhs has been allocated .
7. Total quantity of runoff water generated should be collected in underground tank & used for process green area to minimize fresh water requirement.
8. PP to include carbon foot print in the Environmental Monitoring Program.
9. PP should ensure to submit half yearly compliance 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, GoI, 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.
- 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. 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 (if applicable). The gaseous emissions from the boiler, DG set and scrubber shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- iv. Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- v. The DG sets (500 KVA and 1000 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.
- vi. 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.
- vii. 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, 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 High COD/TDS process effluent (20 KLD) and RO Reject will be treated through MEE/ ATFD. The MEE condensates will be recycled/ reused and MEE bottom will be sent to TSDF site
- iv. The Low COD/TDS effluent, [31 KLD)] will be treated in an on-site ETP followed by RO . The treated effluent will be reused/ recycled.
- v. 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.
- vi. 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.
- vii. Total fresh water requirement shall not exceed 67 KLD and AKVN water supply shall be used
- viii. 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.
- ix. 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.

- x. 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 (500 KVA and 1000 KVA KVA) 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 1200 KW. The power will be supplied by Madhya Pradesh Electricity Board. Briquette will be used in boiler of 2 TPH and 3 TPH

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, 92-95% 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

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 2000 no of plants of fruit species like Kathal, guawa, munga etc as per choice of villagers shall be distributed to villagers. 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 EMP & Corporate Environment Responsibility

- i. 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.
- ii. 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.
- iii. The proposed EMP cost is Rs. 175.0 Lakhs as capital and 96.30 Lakhs /year as recurring cost
- iv. 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.

- v. 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 (if applicable) 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 DTHS 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, GoI, 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 Environment (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 seven years as per EIA notification dtd. 14.09.2006 & its amendments.
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.


(Shriman Shukla)
Member Secretary

Copy to:-

- (1). Principal Secretary, Department of Environment., Government of MP, Mantralaya Vallabh Bhawan, Bhopal.
- (2). Member 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 Dhar, 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 (S), Regional office of the MOEF, (Western Region), Kendriya Paryavaran Bhawan, Link Road No. 3, Ravi Shankar Nagar, Bhopal-462016.
- (7). Guard file.



(Alok Nayak)
Officer-in-Charge

