I/50459/2023

भारत सरकार
GOVERNMENT OF INDIA
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE
क्षेत्रीय कार्यालय, गांधीनगर / **Regional Office, Gandhinagar**

ए 407 , 409 "अरण्य भवन ", सीएच-3 सर्कल के पास, सेक्टर-10ए, गांधीनगर-382010/ A-407& A-409, "ARANYA BHAWAN" Near CH-3 Circle, Sector-10A, **Gandhinagar**-382010
दूरभाष/**Tel No:** +9179-23255067 **Email:** iro.gandhingr-mefcc@gov.in

Dated:09th August, 2023

The Director/ Scientist 'F',
Monitoring Cell,
Ministry of Environment, Forest and Climate change,
Indira Paryavaran Bhawan, Jorbagh Road, Aliganj, New Delhi-110003.
Subject: Review of Action Taken Report submitted by M/s Bharat Rasayan Limited (Unit-II) at Plot No. 42/4, Amod Road, Dahej- I GIDC Industrial Estate, District- Bharuch, Gujarat -reg.

Ref: Environment clearance issued vide MoEF&CC New Delhi Letter No - J-11011/961/2008-IA-II(I) dated 19th October, 2020.

Madam/Sir,

This office had submitted a certified EC Compliance report to MoEF&CC, New Delhi vide letter dated 26.05.2023 wherein few partly compliances were reported. PP vide email dated 24.06.2023 submitted an action taken cum compliance report. The action taken report has been examined in light of the reply received from the PP and remarks of MoEF&CC, IRO, Gandhinagar is enclosed herewith.

2. This issues with the approval of competent authority.
Encl: As above

sd/-

(Dr. Yogesh Kumar)
Deputy Director (S)/Scientist- 'C'
RO Gandhinagar, MoEFCC

Copy to:

1. The Member Secretary, SEIAA Gujarat, Sector 10A, Gandhinagar (msseiaagj@gmail.com).
2. The Director, M/s. Bharat Rasayan Limited (Unit-II) at Plot No. 42/4, Amod Road, Dahej- I GIDC Industrial Estate, District-Bharuch, Gujarat (ajay.gupta@bharatgroup.co.in).

Ministry of Environment, Forest & Climate Change
Regional Office, Gandhinagar

Subject: Addendum to the compliance status reported vide letter dated 26.05.2023 by MoEF&CC, RO Gandhinagar particularly with respect to partly complied conditions.

This office had submitted a certified EC Compliance report to MoEF&CC, New Delhi vide letter dated 26.05.2023 wherein few partly compliances were reported. PP vide email dated 24.06.2023 submitted an action taken cum compliance report on implementation of partly conditions. Based on the observations during the site visit on 13.03.2023 and review of the updated action taken report furnished by the project proponent vide e-mail dated 24.06.2023, the remarks of MoEF&CC, RO, Gandhinagar is presented below:

Updated status of Compliance w.r.to partly complied conditions of Environment clearance issued vide MoEF&CC New Delhi Letter No - J-11011/961/2008-IA-II(I) dated 19th October, 2020.

(**Details of project:** Bharat Rasayan Limited (Unit-II) at Plot No. 42/4, Amod Road, Dahej- I GIDC Industrial Estate, District- Bharuch, Gujarat)

<table>
<tr><th>Condition No.</th><th>Non-compliances observed</th><th>Action Taken Report</th></tr>
<tr><td>Condition No. 5</td><td>Partly Complied.

As per the records furnished during the site visit it was observed that unit has maintained the data for water consumption and industrial effluent generation within the premises. It is directed to maintain proper logbook for record keeping. The data management was not satisfactory.

The details of water consumption for the period of June 2022 to November 2022 is provided below:
<table>
<tr><th colspan="2">GIDC Water consumption from June-22 to Nov-22</th></tr>
<tr><th>Month</th><th>KL/Month</th></tr>
<tr><td>Jun-22</td><td>3072</td></tr>
<tr><td>Jul-22</td><td>8845</td></tr>
<tr><td>Aug-22</td><td>11759</td></tr>
<tr><td>Sep-22</td><td>10515</td></tr>
<tr><td>Oct-22</td><td>12963</td></tr>
<tr><td>Nov-22</td><td>13472</td></tr>
</table></td><td>Information furnished by the Project Proponent:

In this regard, we would like to state that we are regularly maintaining the proper logbook of ETP. The copy of same has been attached herewith as an Annexure-I.

Our ETP is adequate to treat existing effluent load. Adequacy certificate from Birla Vishwakarma Mahavidhyala (Schedule-I Auditor) NABL is attached herewith as an Annexure-II.

Housekeeping near RO plant, ATFD area, Salt handling area, and near to MEE are improve and maintained well. Photographs of same has been attached herewith as Annexure-III.

GIDC Bill as evidence of GIDC permission for water consumption and drainage are attach as annexure-IV. Moreover, we have obtain additional permission for</td></tr>
</table>

Min	**3072**
Max	**13472**
Average KL/Month	**10104**
Average KL/Day	**326**

Above data infers that water consumption during the compliance period varies between 102.4 KL/day – 449.1 KL/day while the average quantity is found to be 326 KL/day which is well within the prescribed limit i.e. 1512 KL/day.

It was observed that effluent stream are segregated into High TDS/COD, Low TDS/COD, and Domestic waste. However High TDS/COD stream has been treated in Stripper column followed by MEE and ATFD. Dilute stream having low TDS/COD has been treated in Biological system followed by MBR and Reverse Osmosis (RO) Plant. RO Permit water has been recycle in Cooling tower make up in utility. Domestic waste has been treated separately in STP plant. After treatment wastewater is disposed to GIDC sewer line a pumping station-A1 through online TOC monitoring system.

It is advised to renovate the entire ETP and submit EMS adequacy certificate for the same. The existing infrastructure of ETP seems inefficient in treating waste water.

General housekeeping must be strengthened near the RO area, ATFD, salt handling area and MEE.

As per the records furnished it was observed that unit needs to strengthen the logbook for recording data of ETP, chemical consumption in effluent treatment; quantity & quality of final effluent discharges at project site. Further, it was informed that the records for the same are furnished to Regional Office, GPCB and also updated on XGN website in monthly patrak time to time.

High TDS/COD Effluent Generation Data of June-22 to Nov-22

Month	Total in KL	Min	Max	Avg.
		KLD		
Jun-22	357	0	131	66
Jul-22	2797	2	122	62
Aug-22	3320	86	142	114

consumption of desalinated water is attach herewith as annexure-V.

Remarks of IRO Gandhinagar:

The Project Proponent has submitted the GIDC Bill for the month of April 2023 as a proof of GIDC permission. Also, the copy of logbook of ETP has been attached.

In view of the above information furnished by the PP and as per the records submitted to this office, the stipulated condition is considered as Complied.

Sep-22	2960	69	120	95
Oct-22	2951	68	100	84
Nov-22	2832	84	109	97

Above data infers that High TDS/COD effluent generated during the compliance period varies between 0 – 142 KL/day while the average quantity is found to be 85 KL/day which is well within the prescribed limit.

Low TDS/COD Effluent Generation Data of June-22 to Nov-22				
Month	**Total in KL**	**Min**	**Max**	**Avg.**
		KLD		
Jun-22	887	30	237	134
Jul-22	6337	99	288	194
Aug-22	7327	177	286	232
Sep-22	7115	122	303	213
Oct-22	7127	76	288	182
Nov-22	7173	187	287	237

Above data infers that low TDS/COD effluent generated during the compliance period varies between 30 KL/day – 303 KL/day while the average quantity is found to be 200 KL/day which is well within the prescribed limit.

STP Effluent Generation Data for the month of June-22 to Nov-22				
Month	**TOTAL in KL**	**Min**	**Max**	**Avg.**
		KLD		
Jun-22	1084	3	71	37
Jul-22	2265	36	103	70
Aug-22	1833	33	93	63
Sep-22	1864	29	102	66
Oct-22	1353	24	61	43
Nov-22	1443	26	84	55

Above data infers that domestic effluent generated during the compliance period varies between 3 – 103 KL/day while the

<table>
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<td>average quantity is found to be 55 KL/day which is well within the prescribed limit i.e. 100 KL/day.

The unit has installed a very efficient STP.

<table>
<tr><th colspan="5">Final Treated Effluent Discharge to GIDC from June-22 to Nov-22</th></tr>
<tr><th rowspan="2">Month</th><th rowspan="2">Total in KL</th><th>Min</th><th>Max</th><th>Avg.</th></tr>
<tr><th colspan="3">KLD</th></tr>
<tr><td>Jun-22</td><td>107</td><td>0</td><td>45</td><td>23</td></tr>
<tr><td>Jul-22</td><td>2294</td><td>0</td><td>138</td><td>69</td></tr>
<tr><td>Aug-22</td><td>1936</td><td>0</td><td>127</td><td>64</td></tr>
<tr><td>Sep-22</td><td>1457</td><td>0</td><td>139</td><td>70</td></tr>
<tr><td>Oct-22</td><td>648</td><td>0</td><td>86</td><td>43</td></tr>
<tr><td>Nov-22</td><td>736</td><td>0</td><td>70</td><td>35</td></tr>
</table>
Above data infers that final treated effluent discharged during the compliance period varies between 0 – 139 KL/day while the average quantity is found to be 39 KL/day which is well within the prescribed limit.

The unit is directed to submit GIDC permission letter for water consumption and final discharge to this office.</td>
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<tr>
<td>Condition No. 6</td>
<td>Partly Complied.

As per the records furnished during the site visit it was observed that unit has maintained proper logbook of power consumption, fuel consumption, etc. at project site. Further, it was informed that the records for the same are furnished to Regional Office, GPCB and also updated on XGN website in monthly patrak time to time.

The details of power consumption for the period of June 2022 to November 2022 is provided below:

<table>
<tr><th colspan="2">Power consumption for the month of June-22 to Nov-22</th></tr>
<tr><th>Month</th><th>KW</th></tr>
<tr><td>Jun-22</td><td>113754</td></tr>
<tr><td>Jul-22</td><td>1643881</td></tr>
<tr><td>Aug-22</td><td>2109252</td></tr>
</table></td>
<td>Information furnished by the Project Proponent:
In this regard, we would like to justify that, as per records of power consumption; avg. power consumption from Jun 2022 to Nov 2022 is 1681505.333 KW per Month. Power consumption given by us are in KWH.
June 2022 to November 2022 average power consumption is 2738.9 KVA against existing permissible limit of 5000
KVA and which will be increasing to 7000 KVA after conversion of EC to CTO.
Hence, unit has not exceed any prescribed limit of power consumption. Power consumption with conversion formula from KWH to KVA for said period is attach as Annexure- VI.

Copy of the Ambient air quality monitoring report is attach herewith as annexure-VII.</td>
</tr>
</table>

Sep-22	2047539
Oct-22	2160896
Nov-22	2013710
Min	**113754**
Max	**2160896**
Average	**1681505.333**

Above data infers that power consumption during the compliance period varies between 113754 KW/Month – 2160896 KW/Month while the average quantity is found to be 1681505.33 KW/Month which is found to be exceeding the prescribed limit.

The unit is directed to submit the reason for increase in power consumption from July 2022 to November 2022 with supporting document to this office.

The details of fuel consumption for the period of June 2022 to November 2022 is provided below:

Fuel consumption for the month of June-22 to Nov-22		
Month	**Coal (MT)**	**H.S.D(LTS)**
Jun-22	116	35380
Jul-22	1282	572
Aug-22	1438	784
Sep-22	1261	2341
Oct-22	1380	5134
Nov-22	1446	334
Min	**116**	**334**
Max	**1446**	**35380**
Average	**1154**	**7424**

It was observed that ESP is provided with boiler, bag filter is provided with TFH and all process vent are connected with scrubber. The unit has installed lime dosing facility to mix lime with the coal in required proportion as an additional measure.

As per the records furnished it was observed that stack and vent monitoring for the compliance period of June 2022 to November 2022 is carried out by third party laboratory (M/s.

Remarks of IRO Gandhinagar:

The Project Proponent has provided the justification for power consumption during the compliance period, and it has been stated that from June 2022 to November 2022 average power consumption is 2738.9 KVA which is within prescribed limits.
Also, the PP has submitted copy of the Ambient air quality monitoring report.

In view of the above information furnished by the PP and as per the records submitted to this office, the stipulated condition is considered as Complied.

Siddhi Green Env. Consultancy) and results for the same is given below:

Month of Jun-2022 to Nov-2022 Boiler Stack				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
PM	81	129	105	150 mg/Nm^3
SO2	50	62	56	100 ppm
Nox	32	36	34	50 ppm

Month of Jun-2022 to Nov-2022 DG set 1,2 and 3										
Parameter	**DG set - 1 Result**			**DG set - 2 Result**			**DG set - 3 Result**			**GPCB Norms**
	Min	**Max**	**Avg**	**Min**	**Max**	**Avg**	**Min**	**Max**	**Avg**	
PM	70	80	75	70	84	77	65	75	70	150 mg/Nm^3
SO2	22	26	24	20	23	21.5	15	21	18	100 ppm
Nox	29	35	32	28	34	31	24	30	27	50 ppm

Month of Jun-2022 to Nov-2022 Process Vent - 1				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
HCl	2.5	2.9	2.7	20 mg/Nm^3
Cl2	0.7	1	0.85	5 mg/Nm^3
HBr	BDL	BDL	BDL	5 mg/Nm^3
BR2	BDL	BDL	BDL	2 mg/Nm^3
BDL-Below detection limit				

Month of Jun-2022 to Nov-2022 Process Vent - 2				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
H2S	BDL	BDL	BDL	5 mg/Nm^3
VOC	BDL	BDL	BDL	-
BDL-Below detection limit				

Month of Jun-2022 to Nov-2022 Process Vent - Plant B

<table>
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<table>
<tr><th rowspan="2">Parameter</th><th colspan="3">Result</th><th rowspan="2">GPCB Norms</th></tr>
<tr><th>Min</th><th>Max</th><th>Avg</th></tr>
<tr><td>HCl</td><td>1</td><td>1.8</td><td>1.4</td><td>20 mg/Nm^3</td></tr>
<tr><td>SO2</td><td>12</td><td>20</td><td>16</td><td>40 mg/Nm^3</td></tr>
<tr><td>H2S</td><td>BDL</td><td>BDL</td><td>BDL</td><td>05 mg/Nm^3</td></tr>
<tr><td colspan="5">BDL-Below detection limit</td></tr>
</table>
<table>
<tr><th colspan="5">Month of Jun-2022 to Nov-2022 Process Vent Plant C</th></tr>
<tr><th rowspan="2">Parameter</th><th colspan="3">Result</th><th rowspan="2">GPCB Norms</th></tr>
<tr><th>Min</th><th>Max</th><th>Avg</th></tr>
<tr><td>DMA</td><td>BDL</td><td>BDL</td><td>BDL</td><td>-</td></tr>
<tr><td>SO2</td><td>13</td><td>16</td><td>14.5</td><td>40 mg/Nm^3</td></tr>
<tr><td>HCl</td><td>1</td><td>1.1</td><td>1.05</td><td>20 mg/Nm^3</td></tr>
<tr><td>VOC</td><td>BDL</td><td>BDL</td><td>BDL</td><td>-</td></tr>
<tr><td colspan="5">BDL-Below detection limit</td></tr>
</table>
Based on the monitoring report carried out by NABL accredited laboratory, it was inferred that the level of emissions for stack and vent monitoring was well within prescribed limit of GPCB and at no time the level went beyond the permissible limit.

The unit is directed to submit ambient air quality monitoring report carried out during the compliance period to this office.
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<td>Specific Condition No. i</td>
<td>Partly Complied.

It is directed to submit the point wise compliance of suggestions given by sub-committee of EAC.</td>
<td>Information furnished by the Project Proponent:

Noted. Point wise compliance of suggestion given by sub-committee of EAC was already submit on 24/01/2020. Copy of it has been attach herewith as annexure-VIII.

Remarks of IRO Gandhinagar:

The Project Proponent has submitted the Point wise compliance of suggestion given by sub-committee of EAC.

In view of the above information furnished by the PP and as per the records submitted</td>
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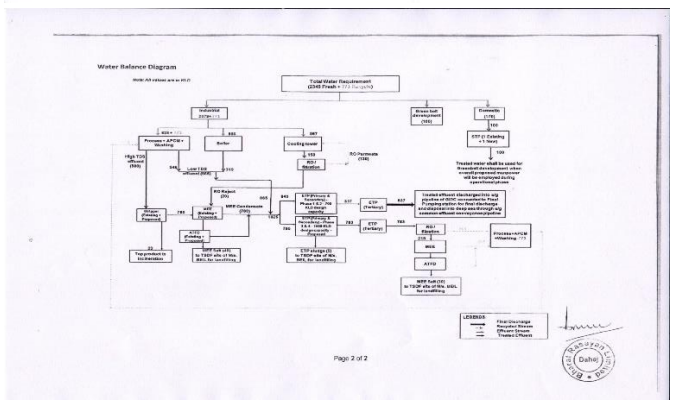
		to this office, the stipulated condition is considered as Complied.
Specific Condition No. iii	**Partly Complied.** Kindly refer condition no. 5. **The unit has not discharged any effluent since February. It was informed that they will move to ZLD from October 2023.** During the site visit it was informed that unit is committed to implement ZLD within 03 years. The ZLD scheme for the same is given below: **Annexure-2** **Water Balance Details** **Water Consumption (for Existing & Proposed expansion)** Fresh water requirement (m3/day) Existing Quantity (m3/day): (i) Domestic: 50; (ii) Industrial: (a) Process + APCM: 455; (b) Boiler: 300; (c) Cooling: 200; (d) Washing: 354; (e) Gardening: 60; Domestic: 50; Industrial: 1369; Total: 1419 Proposed additional quantity (m3/day): (i) Domestic: 120; (ii) Industrial: (a) Process + APCM: 474; (b) Boiler: 586; (c) Cooling: 367; (d) Washing: 116; (e) Gardening: 40; Domestic: 120; Industrial: 1583; Total: 1703 Total Water demand (m^3/day): (i) Domestic: 170; (ii) Industrial: (a) Process + APCM: 929; (b) Boiler: 886; (c) Cooling: 567; (d) Washing: 470; (e) Gardening: 100; Domestic: 170; Industrial: 2952; Total: 3122 Water available from recycling and reuse (m^3/day): (i) Domestic: 0; (ii) Industrial: (a) Process + APCM: 773; (b) Boiler: 0; (c) Cooling: Note 1; (d) Washing: 0; (e) Gardening: Note 2; Domestic: 0; Industrial: 773; Total: 773 Final GIDC water consumption (m^3/day): (i) Domestic: 170; (ii) Industrial: (a) Process + APCM: 156; (b) Boiler: 886; (c) Cooling: 567; (d) Washing: 470; (e) Gardening: 100; Domestic: 170; Industrial: 2179; Total: 2349 After proposed expansion, Total fresh water consumption shall be reduced as unit is going to ZLD for proposed quantity & Recycled water (773 KLD) shall be used in Process + APCM + Washing. Approximately 45 KLD will be used for recovery purpose (MEE utility). **Note 1:** Cooling tower blowdown (150 KLD) shall be passed through RO/Filtration and 130 KLD RO permeate reused for cooling tower makeup & RO reject sent to MEE for further treatment. **Note 2:** 100 KLD sewage water will be treated in STP & treated water shall be used for Greenbelt development when overall proposed manpower will be employed during operational phase. **Waste Water Generation (for Existing & Proposed expansion)** Wastewater generation (KL/Day): (i) Domestic: Existing Quantity 40, Proposed additional quantity 60, Total Quantity 100; (ii) Industrial: (a) Processing + APCM + Washing: 822, 479, 1301; (b) Boiler + Contaminated steam: 15, 304, 319; (c) Cooling: Note 1, Note 1, Note 1; Domestic: 40, 60, 100; Industrial: 837, 783, 1620; Total: 877, 843, 1720 **Note 1:** Cooling tower blowdown shall be passed through RO/Filtration and reused for cooling tower makeup. Page 1 of 2  	**Information furnished by the Project Proponent:** Noted. As per certified compliance report, unit has not discharged any effluent since February 2023. For the same, copy of discharge of has been attach herewith as an annexure-IX for your ready reference. **Remarks of IRO Gandhinagar:** Kindly refer condition no. 5. In view of the above information furnished by the PP and as per the records submitted to this office, the stipulated condition is considered as Complied.
Specific Condition No. v	**Partly Complied.** During the site visit it was informed that in accordance with MoEF&CC's OM dated 01/05/2018 regarding ''Corporate Environment Responsibility'' (CER), Brownfield projects having investment >100 crores have to contribute 0.75% of the Capital investment. Accordingly, proponent has committed to allocated to Rs. 1.5 crores for CER activities which is to be conducted after the project is operational.	**Information furnished by the Project Proponent:** In this regard, we would like to state that unit has contributed for CER activities as committed. Details of expenditure over last two years along with relevant documents and photographs attached herewith as annexure-X.

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Tentative CER Activities

<table>
<tr><th>Sr. no.</th><th>Description</th></tr>
<tr><td></td><td>Infrasructure</td></tr>
<tr><td>1</td><td>Installation / Repair / Service of RO plant</td></tr>
<tr><td>2</td><td>Tree Plantation on village boundary and pond boundary</td></tr>
<tr><td>3</td><td>Providing paverblocks on internal roads of surrounding villages or constructing RCC roads</td></tr>
<tr><td>4</td><td>Storm water drainage improvement</td></tr>
<tr><td>5</td><td>Providing LED street light</td></tr>
<tr><td></td><td>Education & Training</td></tr>
<tr><td>6</td><td>Repair and construction work for schools</td></tr>
<tr><td>7</td><td>Training and guidance to farmers</td></tr>
<tr><td>8</td><td>Scholarships for higher education</td></tr>
<tr><td>9</td><td>Transport facility to school and college students</td></tr>
<tr><td></td><td>Health</td></tr>
<tr><td>10</td><td>Medical camp in nearby villages</td></tr>
<tr><td>11</td><td>Contribution to GIDC for health programme for workers</td></tr>
<tr><td></td><td>Amenities and Sanitation</td></tr>
<tr><td>12</td><td>Overhead tank construction / tapwater facility</td></tr>
<tr><td>13</td><td>Donation to schools and hospitals for improving drinking water, sanitation facilities and solar electrification</td></tr>
<tr><td>14</td><td>Pond restoration</td></tr>
</table>

It is directed to submit the expenditure under respective heads over last 2 years along with relevant documents and photographs. The donations given to organizations were also accounted for CER without any details.

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Remarks of IRO Gandhinagar:

The Project Proponent has submitted the details of expenditure regarding CER activities over last two years along with relevant documents and photographs.

In view of the above information furnished by the PP and as per the records submitted to this office, the stipulated condition is considered as Complied.

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<td>General Condition No. vi</td>
<td>

Partly Complied.

During the site visit it was informed that unit has submitted copy of the clearance letter to concerned authority and informed the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the GPCB and may also be seen at the website of Ministry/ GPCB.

The unit is directed to submit the copy of acknowledgement letter to this office.

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Information furnished by the Project Proponent:

In this regard, we have already submitted the clearance letter to concerned authority and given advertisement in newspapers in regional language and in English language regarding the same. Acknowledgement copy of the newspaper advertisement along with EC copy submitted to GPCB has been attach herewith as annexure-XI.

Remarks of IRO Gandhinagar:

The Project Proponent has submitted the copy of Acknowledgement of the newspaper advertisement along with EC copy submitted to GPCB.

In view of the above information furnished by the PP and as per the records submitted to this office, the stipulated condition may

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		be considered as Complied at the discretion of the EAC, MoEFCC.
Condition No. 18	**Partly Complied.** As per the records furnished during the site visit it was observed that unit has obtained CCA from GPCB for existing production activities under provisions of the Water (Prevention & Control of Pollution) Act,1974, Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and other Wastes (Management and Transboundary Movement) Rules, 2016. Unit has also obtained policy under the Public Liability Insurance Act, 1991 along with their amendments and rules. **The unit is directed to submit the Public Liability Insurance Policy to this office.**	**Information furnished by the Project Proponent:** In this regard, the copy of PLI has been attach herewith as an annexure-XII. **Remarks of IRO Gandhinagar:** The Project Proponent has submitted the copy of PLI. In view of the above information furnished by the PP and as per the records submitted to this office, the stipulated condition is considered as Complied.

SUMMARY NOTE:

Updated status of implementation of Conditions:

Compliance status of partly complied reflected in the CCR report dated 26.05.2023	Updated Compliance status as on 24.06.2023
Partly Complied - 7	Complied – 7 Partly Complied - 0

sd/-

Dr. Yogesh Kumar
Deputy Director (S)/Scientist 'C'
MoEFCC, RO, Gandhinagar.

डॉ. योगेश कुमार / Dr. Yogesh Kumar
वैज्ञानिक 'सी' / Scientist 'C'
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,
Ministry of Enviroment, Forest & Climate Change
भारत सरकार / Govt. of India
ए. क्षे. का., गाँधीनगर (गुजरात) / IRO,Gandhinagar(Gujarat)

I/44893/2023

भारत सरकार
GOVERNMENT OF INDIA
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE
एकीकृत क्षेत्रीय कार्यालय, गांधीनगर / **Integrated Regional Office, Gandhinagar**

ए 407 , 409 " अरण्य भवन ", सीएच-3 सर्कल के पास, सेक्टर-10ए, गांधीनगर-382010/ **A-407& A-409, "ARANYA BHAWAN"** Near CH-3 Circle, Sector-10A, **Gandhinagar**-382010
दूरभाष/**Tel No:** +9179-23255067 **Email:** iro.gandhingr-mefcc@gov.in

Dated:26th May, 2023

To

The Additional Director/ Scientist 'E'
Monitoring Cell
Ministry of Environment, Forest and Climate Change,
Indira Paryavaran Bhawan, Jorbagh Road, Aliganj,
New Delhi-110003

Subject: Certified Compliance report to M/s. Bharat Rasayan Limited (Unit-II) at Plot No. 42/4, Amod Road, Dahej- I GIDC Industrial Estate, District-Bharuch, Gujarat -reg.

Ref: MOEFCC, New Delhi letter. No. J-11011/961/2008-IA-II(I) dated 19th October, 2020.

मैडम / सर,

उद्धृत विषय के संदर्भ में, यह आपके ध्यान में लाया जाता है कि प्रमाणित अनुपालन रिपोर्ट जारी करने के उद्देश्य से अधोहस्ताक्षरी द्वारा 13th March, 2023 को पूर्वोक्त परियोजना का निरीक्षण किया गया था।

2. तदनुसार, टिप्पणियों के साथ एक विस्तृत निगरानी रिपोर्ट (प्रतिलिपि संलग्न) अवलोकन और आगे की उचित कार्रवाई के लिए इसके साथ संलग्न की जा रही है।

अनुलग्नक: उपरोक्त के अनुसार

सादर

(डॉ. योगेश कुमार)उप निदेशक (एस) / वैज्ञानिक- 'सी'
IRO गांधीनगर, MoEFCC

Copy to: -

1. The Member Secretary, SEIAA Gujarat, Sector 10A, Gandhinagar (msseiaagj@gmail.com).
2. The Director, M/s. Bharat Rasayan Limited (Unit-II) at Plot No. 42/4, Amod Road, Dahej- I GIDC Industrial Estate, District-Bharuch, Gujarat (ajay.gupta@bharatgroup.co.in).

Monitoring the Implementation of Environmental safeguards
Ministry of Environment, Forest & Climate Change
Integrated Regional Office, Gandhinagar
Monitoring Report
DATA SHEET

No. SGEPL/BRL-D/ EC-Datasheet/07-2021			
1	Project Type : River-Valley / Mining Industry / Thermal / Nuclear / other (Specify}	:	Agrochemicals & their Intermediates
2	Name of the Project	:	Expansion of Agrochemicals & their Intermediates at Existing unit M/s. Bharat Rasayan Limited (Unit-II).
3	Clearance Letter(s)/ OM No. & Date	:	J-11011/961/2008-IA-II(I) dated 19th October, 2020
4	Location		
	a]. District (s)	:	Bharuch
	b]. State (s)	:	Gujarat
	c]. Latitude / Longitude	:	21° 43' 25.01" N / 72° 35' 33.9" E
5	Address for Correspondence	:	Plot No. 42/4, GIDC Estate, Dahej, Tal: Vagra, Dist. Bharuch, Gujarat.
	a]. Address of Concerned Project Chief Engineer With Pin code & Telephone / Telex / Fax Numbers.	:	Mr Ajay Gupta Mobile No.: 7046500020 E-mail: ajay.gupta@bharatgroup.co.in
	b]. Address of Executive Project Engineer / Manager (with Pin code / Fax Number)	:	Mr Ajay Gupta Mobile No.: 7046500020
6	Salient Features		
	a]. Of the Project	:	As detailed below

Components	**Proposed Scenario**
EC No.	J-11011/961/2008-IA-II(I)
Environmental Clearance accorded for -	**Product name attached in Annexure-1**
Total Power Requirement	7000 KVA
Source of Power	DGVCL
Fresh Water requirement	3122 KLD
Source of Water Supply	GIDC water Supply
Wastewater Generation	Industrial: 1815 m^3/day [Low COD and Low TDS (865 m3/day), Cooling Tower blow down (150 m3/day), High COD, high TDS effluent (800 m3/day)] Domestic: 100 m^3/day
Process Emissions	HCl, SO_2, HBr, Br_2, H_2S, NOx, NH_3, VOC, Cl_2, DMA, PM and NaCN
Flue Gas Emission	PM, SO_2, NOx
Fuel Type	Natural Gas Or Furnace Oil Or Coal & HSD
Fuel Requirement	Natural Gas: 80000 SM^3/ day OR Furnace Oil: 90 MT/Day OR Coal:

	200 MT/Day & HSD: 17 KL/Day	
Man power	**Existing :** 350 Nos. direct employees + 250 Nos. indirect employees	
b]. Of the Environmental Management Plans	:	As follows.
Sr. No	**Activity**	**Status**
1	Formulation of EHS cell Constitutes EHS in charge, ETP super visor and operators, Lab chemist and assistants	EHS cell consists of EHS In charge,ETP super visor and operators, Lab chemist and assistants.
2	For Air Environment Management • To monitor the ambient air quality parameters and flue & process gas emissions within premises and also in the nearby area regularly and to compare with the regulating standards so that any necessary corrective actions can be taken. • Work place monitoring to be carried out periodically to check fugitive emissions, if	• Company maintains its own records and monitors the Ambient air and flue gas emission within premises periodically. Monitoring of ambient air & flue gas analysis is done by Siddhi Green Excellence Pvt Ltd., Ankleshwar. • Work place monitoring is carried out periodically.

Bharat Rasayan - AAQM (ETP AREA) Month of June-22 to Nov-22					
SR NO	Parameter	Result Mg/Nm^3			NAAQS Norms
		Min	Max	Avg	µg/m^3
1	PM10 (µg/m^3)	47	8BDL	47	1BDLBDL
2	PM2.5 (µg/m^3)	17	35	26	6BDL
3	SO2 (µg/m^3)	12	24	18	8BDL
4	NOx (µg/m^3)	24	35	29.5	8BDL
5	HCL (µg/m^3)	BDL	BDL	BDL	2BDLBDL
6	CL2 (µg/m^3)	BDL	BDL	BDL	100
7	H2S (µg/m^3)	BDL	BDL	BDL	500
8	HC (µg/m^3)	BDL	BDL	BDL	160
9	NH3 (µg/m^3)	15	30	22.5	400
10	HF (µg/m^3)	BDL	BDL	BDL	60
11	CO (µg/m^3)	995	1120	1057.5	4
12	CS2 (µg/m^3)	BDL	BDL	BDL	1

any.

- To develop and maintain greenbelt, in and around the factory,for reducing the effect of air pollutants due to their deposition.
- To follow proper loading and unloading practices to minimize dusting
- To maintain proper record for the fuel consumption, start-up time and duration of boiler operation towards energy conservation

Bharat Rasayan - AAQM (HR Building Terrace Area) Month of June-22 to Nov-22

SR NO	Parameter	Result Mg/Nm^3			NAAQS Norms
		Min	Max	Avg	µg/m^3
1	PM10 (µg/m^3)	48	80	64	100
2	PM2.5 (µg/m^3)	15	34	24.5	60
3	SO2 (µg/m^3)	12	23	17.5	80
4	NOx (µg/m^3)	24	36	30	80
5	HCL (µg/m^3)	BDL	BDL	BDL	200
6	CL2 (µg/m^3)	BDL	BDL	BDL	100
7	H2S (µg/m^3)	BDL	BDL	BDL	500
8	HC (µg/m^3)	BDL	BDL	BDL	160
9	NH3 (µg/m^3)	13	29	21	400
10	HF (µg/m^3)	BDL	BDL	BDL	60
11	CO (µg/m^3)	790	894	842	4
12	CS2 (µg/m^3)	BDL	BDL	BDL	1

Bharat Rasayan - AAQM (Pump House) Month of June-22 to Nov-22

SR NO	Parameter	Result Mg/Nm^3			NAAQS Norms
		Min	Max	Avg	µg/m^3
1	PM10 (µg/m^3)	49	80	64.5	100
2	PM2.5 (µg/m^3)	15	35	25	60
3	SO2 (µg/m^3)	12	24	18	80
4	NOx (µg/m^3)	24	35	29.5	80
5	HCL (µg/m^3)	BDL	BDL	BDL	200
6	CL2 (µg/m^3)	BDL	BDL	BDL	100
7	H2S (µg/m^3)	BDL	BDL	BDL	500
8	HC (µg/m^3)	BDL	BDL	BDL	160
9	NH3 (µg/m^3)	14	29	21.5	400
10	HF (µg/m^3)	BDL	BDL	BDL	60
11	CO (µg/m^3)	700	785	742.5	4
12	CS2 (µg/m^3)	BDL	BDL	BDL	1

- Unit has developed & maintained green belt area.
- Unit is having closed system for loading and unloading of chemicals.
- Unit is maintaining records for the fuel consumption, start-up time and duration of boiler operation towards energy conservation

3	For Water Environment Management • To investigate possibilities of water reuse and recycling for reducing water consumption and wastewater generation • Records of water consumption, effluent generation, effluent discharge, water characteristics, treated and untreated effluent characteristics to be maintained. • To monitor the adequacy and efficiency of ETP so that the effluent is given suitable treatment and the treated effluent meets specified norms of available CC&A of GPCB • The effluent collection and discharge drainages, effluent handling and	• Reuse and recycling options are being investigated together with feasibility of rainwater harvesting • Unit is maintaining records of water consumption, effluent generation, effluent discharge, water characteristics, treated and untreated effluent characteristics. • The adequacy and efficiency of ETP is maintained well and the effluent is treated appropriately at all the stages. It is ensured that the treated effluent meets specified norms of as specified in CC&A of GPCB. • The effluent collection anddischarge drainages, effluent handling and treatment systems are maintained and regularly Monitored to prevent leakages or sudden break-down bypreventive maintenance of all ETP units is taken periodically by taking appropriate proactiveactions. • Good house-keeping practices have been implemented by the unit to prevent spillages and Contaminated surface runoffgoing to storm water drains.

	treatment systems to be maintained and regularly monitored to prevent leakages or sudden break-down. • Proper house-keeping to be adopted to prevent spillages and contaminated surface runoff going to storm water drains.	

	4	For Hazardous / Non-hazardous waste management • Proper storage and handling arrangements in compliance to the conditions of authorization granted by SPCB. • Proper signboards to be provided at relevant places. • All the necessary regulatory procedures as per the amended Hazardous Waste Management & Handling Rules – 2003 to be followed and adhered with. • The transportation of hazardous waste to the TSDF Site to be as per the guidelines and accompanied with Form-9. • Monthly records of generation, storage and disposal of hazardous waste should be maintained in a record register as per the format of Form-3 as per amended Hazardous Waste rules – 2003 and annual returns of disposal to be submitted to SPCB in prescribed form – 4 and form – 3.	• Appropriate storage and handling arrangements for all the hazardous waste are provided as per the conditions specified in the authorization granted by GPCB. • Signboards are provided at relevant places. • Unit is following all the applicable regulatory procedures as per the amended Hazardous Waste Management & Handling Rules – 2016. • Unit is following guidelines for transportation of hazardous waste to all the TSDF & CHWIF and is accompanied with form-10. • Monthly records of generation, storage and disposal of hazardous waste are maintained in a record register as per the format of Form3 as per amended Hazardous Waste rules – 2016 and annual returns of disposal of all the hazardous waste are Submitted to GPCB in prescribed forms – 4 and form – 3.	

7	Break Up of the Project Area	:	Unit is located at GIDC Industrial Estate, Dahej
	a]. Submergence area : forest & Non-forest		
	b]. Others		
8	Breakup of the project affected population with enumeration of those losing houses / dwelling units, only agricultural land, dwelling units & agricultural land & landless laborers / artisan.	:	Not applicable since unit is located at GIDC Industrial Estate, Dahej
	a]. SC , ST / Advises	:	---
	b]. Others	:	---
	(Please indicate whether these figures are based on any scientific and systematic survey carried out or only provisional figures, if a survey is carried out give details and years of survey)	:	---

9	Financial Details	:	
	a]. Project cost as originally planned and subsequent revised estimates and the year of price reference	:	Rs 200 Crore (For Proposed Expansion only)
	b]. Allocation made for environmental Management plans with item wise and year wise break-up.	:	As follows

Sr. No.	Particulars	Recurring Cost Per Annum [Rs. In lakh]	Capital Cost [Rs. In lakh]
1.	Air Pollution Control	70	150
2.	Water Pollution Control	2200	1100
3.	Noise Pollution Control	0.1	5
4.	Environment Monitoring & Management	20	150
5.	Occupational Health & Safety	20	50
6.	Green Belt development & maintenance	10	50
7.	Solid waste management	400	95

	c]. Benefit cost ratio / Internal rate of return and the year of assessment	:	CTE No has been issued by GPCB; CTE No:15590 Dated: 09/08/2019
	d]. Whether (c) includes the cost of environmental management as shown in the above	:	Yes
	e]. Actual expenditure incurred on the project so far	:	--
	f]. Actual expenditure incurred on the environment management so far		--
10	Forest land Requirement	:	Not applicable since unit is located at GIDC Industrial Estate, Dahej
	a]. The status of approval for diversion of forest land for non-forestry use		--
	b]. The Status of clearing fell in	:	--
	c]. The status of compensatory afforestation, if any		--
	d]. Comments on the viability & sustainability of compensatory afforestation programme in the light of actual field experience so far	:	--
11	The status of clear felling in non-forest areas (Such as submergence area of reservoir, approach roads), if any with quantitative information.	:	Not applicable since unit is located at GIDC Industrial Estate, Dahej
12	Status of construction	:	
	a]. Date of commencement (Actual and / or Planned).	:	20th November, 2020
	b]. Date of completion (Actual and / or Planned)	:	31st December 2023

13	Reasons for the delay if the project is yet to start	:	Project activities already started
14	Dates of site visits		
	a]. The dates on which the project was monitored by the Regional Office on Previous occasions, if any	:	- Team of EAC members from MOEF New Delhi, RO MOEF Bhopal or RO GPCB visited site - RO GPCB Bharuch visited site on 06/06/2022 - RO GPCB Bharuch Visited site on 18/06/2022 - RO GPCB Bharuch Visited site on 20/08/2022 - RO GPCB Bharuch Visited site on 26/09/2022 13.03.2023 by IRO Gandhinagar
	b]. Date of site visit for this monitoring project	:	
15	Details of correspondence with project authorities for obtaining action plans / information on status of compliance to safeguards other than the routine letters for logistic support for site visits	:	No correspondence yet
	(The first monitoring report may contain the details of all the letters issued so far, but the later reports may cover only the letters issued subsequently.)	:	--

PART-II: STATUS OF COMPLIANCE &
PART-III:
DESCRIPTIVE REPORT ON STATUS OF COMPLIANCE TO CONDITIONS OF ENVIRONMENT CLEARANCE AND ENVIRONMENT MANAGEMENT

Compliance Status of Environmental Clearance issued by MoEF&CC, New Delhi vide letter. No. F. No. J-11011 / 961 / 2008-IA – II(I), Dated: 19th October, 2020.

(**Details of project:** Expansion of agrochemicals and their intermediates manufacturing unit from 12,300 TPA to 29,200 TPA by M/s. Bharat Rasayan Limited (Unit-II) located at plot No. 42/4, Amod Road, Dahej-I GIDC Industrial Estate, Dahej, District: Bharuch, State: Gujarat.)

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td>1</td><td>This has reference to your online proposal No. IA/GJ/IND2/114039/2008 dated 7th September 2019 and 7th July 2020 for environmental clearance to the above mentioned project.</td><td>Noted.</td></tr>
<tr><td>2</td><td>The Ministry of Environment, Forest and Climate Change has examined the proposal for environmental clearance to the project for expansion of agrochemicals and their intermediates manufacturing unit from 12,300 TPA to 29,200 TPA by M/s. Bharat Rasayan Limited (Unit-II) in an area of 105106.75 sqm. Located at plot No. 42/4, Amod Road, Dahej-I GIDC Industrial Estate, Dahej, District Bharuch, Gujarat</td><td>Noted.</td></tr>
<tr><td>3.</td><td>The details of existing and proposed products and capacity are as under:-
<table>
<tr><th>Sr. No</th><th>Name of Product</th><th>CAS No.</th><th>Existing (TPA)</th><th>Proposed (TPA)</th><th>Total (TPA)</th><th>End Use</th><th>LD50-Oral (Rat) mg/kg</th><th>Remarks</th></tr>
<tr><td>1</td><td>2,4-D-Ethyl Ester</td><td>533-23-3</td><td>0</td><td>700</td><td>700</td><td>Weedicide</td><td>650-800</td><td>New Product</td></tr>
<tr><td>2</td><td>4-acetyl-2-methylbenzoic acid (AMBA)</td><td>55860-35-0</td><td>0</td><td>50</td><td>50</td><td>Inter-mediate</td><td>>300 (Mouse)</td><td>New Product</td></tr>
<tr><td>3</td><td>Atrazine</td><td>1912-24-9</td><td>0</td><td>40</td><td>400</td><td>Herbicide</td><td>2220</td><td>New Product</td></tr>
<tr><td>4</td><td>Azoxystrobin Technical</td><td>131860-33-8</td><td>0</td><td>200</td><td>200</td><td>Fungicide</td><td>>2000</td><td>New Product</td></tr>
<tr><td>5</td><td>Bispyribac Sodium salt</td><td>125401-</td><td>0</td><td>200</td><td>200</td><td>Herbicide</td><td>2635</td><td>New Produc</td></tr>
</table></td><td>Complied.

During the site visit it was informed that the unit is engaged in manufacturing of existing products based on the permission obtained from Pollution control board.

The monthly production data for the compliance period (June 2022 to November 2022) is given below:
<table>
<tr><th>Product Name</th><th>Jun-22</th><th>Jul-22</th><th>Aug-22</th><th>Sep-22</th><th>Oct-22</th><th>Nov-22</th><th>Total MT</th></tr>
<tr><td>Hpoa hcl (2-hydroxy propyloxymine hydro chloride)</td><td>1</td><td>1</td><td>-</td><td>-</td><td>-</td><td>-</td><td>2</td></tr>
<tr><td>Metaphenoxy benzaldehyde</td><td>8</td><td>90</td><td>134</td><td>168</td><td>168</td><td>175</td><td>743</td></tr>
<tr><td>Penoxsulam</td><td>2</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>2</td></tr>
<tr><td>Pesticide formulation (liquid)</td><td>14</td><td>19</td><td>-</td><td>-</td><td>-</td><td>-</td><td>33</td></tr>
</table></td></tr>
</table>

Sr. No.	EC Conditions								
			92-5						t
	6	Butachlor Technical	23184-66-9	0	1000	1000	Herbicide	1740	New Product
	7	Carfentrazone-ethyl	128639-02-1	0	50	50	Herbicide	5143	New Product
	8	Cartap hydrochloride	15263-52-2	0	300	300	Insecticide	250	New Product
	9	Cypermethric acid chloride (CMAC)	52314-67-7	0	2000	2000	Inter-mediate	> 600	New Product
	10	isopropyl 5- chloro-4-Methyl-2-nitrobenzoate (CMNBP)	1204518-43-3	0	100	100	Inter-mediate	> 500	New Product
	11	Cymoxanil Technical (98%)	57966-95-7	0	300	300	Fungicide	1100	New Product
	12	3,6-dichloropyridazin-4-ol (DCHD)	2779-81-9	0	100	100	Inter-mediate	> 200 (Fish)	New Product
	13	deltamethrin Technical	52918-63-5	0	300	300	Insecticide	> 5000	New Product
	14	Fenoxaprop-p –ethyl	71283-80-2	0	200	200	Herbicide	3150-4000	New Product
	15	Fenpropathrin Technical (90% min)	64257-84-7	0	150	150	Insecticide	1000 (Skin & Eye)	New Product
	16	Halosulfuron-methyl	100784-20-1	0	50	50	Herbicide	8866	New Product
	17	2-hydroxy propyloxy mine hydrochloride (HPOA HCL)	950595-7-9	0	100	100	Inter-mediate	(Mouse)	New Product
	18	Icaridin	119515-38-7	0	15	15	Insecticide	4743	New Product
	19	Imibenconazole	86598-92-	0	100	100	Fungicide	2800	New Produc

Compliance Status							
Lambda cyhalothrin technical	-	22	53	53	79	62	269
Pendimethalin technical	-	20	18				37
Phenthoate technical	-	19	37	30	39	39	163
Tolfenpyrad	-	5	7	12	12	8	45
Bifenthrin technical	-	2	-	-	-	-	2
Cypermethrin technical	-	3	-	-	-	-	3
Metribuzine technical	-	30	76	50	53	58	266
Thiamethoxam technical	-	48	67	61	57	67	300
Diuron technical	-	-	54	66	91	20	231
Ethion technical	-	-	39	62	80	76	257
Metaphenoxy benzyl alcohol	-	-	-	19	25	20	65
Sulfosulfuron technical	-	-	-	4	6	-	10
Chlorimuron ethyl technical 95%	-	-	-	-	-	10	10
TOTAL							2437

Sr. No.	EC Conditions									Compliance Status
			7						t	
		20	Isofetamid	875915-78-9	0	100	100	Fungicide	1302-6690	New Product
		21	Lambda Cyhalothric Acid	72748-35-7	0	1000	1000	mediate	980	New Product
		22	M,N,O-1,2 dimethyl-N-Nitrosourea	255708-80-8	0	100	100	mediate	> 500	New Product
		23	Paclobutrazol	76738-62-0	0	50	50	Plant growth regulator	1300	New Product
		24	Penoxsulam	219714-96-2	0	100	100	Herbicide	> 5000	New Product
		25	Picoxystrobin Technical	117428-22-5	0	50	50	Fungicide	> 5000	New Product
		26	Pymetrozine	123312-89-0	0	100	100	Insecticide	> 5000	New Product
		27	Pyrithiobac Sodiun	123343-16-8	0	50	50	Herbicide	3300	New Product
		28	Spiromesifen Technical	283594-90-1	0	50	50	Insecticide	> 2500	New Product
		29	Thifluzamide	130000-40-7	0	170	170	Fungicide	> 6500	New Product
		30	Thiodicarb Technical (94%)	59669-26-0	0	150	150	Insecticide	120	New Product
		31	Thiophanate-methyl	23564-05-8	0	200	200	Fungicide	6640	New Product
		32	Tolfenpyrad	129558-76-5	0	50	50	Insecticide	260-386	New Product

Sr. No.	EC Conditions									Compliance Status
	33	Topramezone	210631-68-8	0	50	50	Herbicide	> 2000	New Product	
	34	Zeta Cypermethrin	52315-07-8	0	350	350	Insecticide	> 5000	New Product	
	35	Zineb	12122-67-7	0	200	200	Fungicide	1850-8900	New Product	
	36	Dimefluthrin Technical	271241-14-6	0	15	15	Insecticide	> 2000	New Product	
	37	Meperfluthrin Technical	915288-13-0	0	8	8	Insecticide	> 2000	New Product	
	38	Pilot products #		0	100	100			New Product	
	39	Acetamiprid Technical	135410-20-7	100	500	600	Insecticide	217	Expansion	
	40	Alpha Cypermethrin Technical	67375-30-8	100	300	400	Insecticide	> 2000 (Skin & Eye)	Expansion	
	41	4-acetyl-2-methylbenzamide (AMBAD)	1095275-06-1	25	75	100	Intermediate	> 2000 (Mouse)	Expansion	
	42	Bifenthrin Technical	82657-04-3	100	600	700	Insecticide	> 2000 (rabbit) (Dermal)	Expansion	
	43	Chlorpyrifos- methyl Technical	5598-13-0	100	400	500	Insecticide	3000	Expansion	
	44	Clodinafop Propargyl Technical	105512-06-9	250	50	300	Herbicide	1392	Expansion	
	45	Cypermethrin Technical	52315-07-8	400	800	1200	Insecticide	7180	Expansion	

Sr. No.	EC Conditions									Compliance Status
	46	Chlorimuron Ethyl Technical (95%)	90982-32-4	10	15	25	Herbicide	4102	Expansion	
	47	Diafenthiuron Technical	80060-09-9	300	500	800	Insecticide	2068	Expansion	
	48	Propanil Technical	709-98-8	50	100	150	Herbicide	367	Expansion	
	49	Diuron Technical	330-54-1	900	300	1200	Herbicide	3400	Expansion	
	50	Difenoconazole Technical	119446-68-3	50	250	300	Fungicide	1453	Expansion	
	51	3',5'-Dichloro-2,2,2-trifluoroacetophenone (DCAP)	130336-16-2	25	75	100	Inter-mediate	(Mouse)	Expansion	
	52	Ethion Technical	563-12-2	700	300	1000	Insecticide	1084	Expansion	
	53	Fipronil Technical	120068-37-3	60	540	600	Insecticide	> 2000(Skin & eye)	Expansion	
	54	Fenpyroximate Technical	134098-61-6	15	10	25	Insecticide	245	Expansion	
	55	Isoprothiolane Technical (96%)	50512-35-1	100	50	150	Fungicide	1190	Expansion	
	56	Imidacloprid Technical	138261-41-3	250	350	600	Insecticide	410	Expansion	
	57	Indoxacarb Technical	144171-61-9	20	80	100	Insecticide	268	Expansion	
	58	Imazerthapyr Technical (97%)	81335-77-5	50	50	100	Herbicide	> 5000	Expansion	
	59	Lambda Cyhalothrin Technical	91465-08-6	600	400	1000	Insecticide	632 - 696 (skin & Eye)	Expansion	
	60	m-phenoxybenzaldehyde	39515-51-0	2200	90	2290		1222	Expansion	

Sr. No.	EC Conditions									Compliance Status
							medi ate			
	61	Metsulfuron- Methyl Technical	74223-64-6	20	10	30	Herbicide	> 5000	Expansion	
	62	Metribuzin Technical	21087-64-9	300	600	900	Herbicide	1100	Expansion	
	63	Novaluron Technical	116714-46-6	10	90	100	Insecticide	> 5000	Expansion	
	64	Propargite Technical	2312-35-8	25	75	100	Insecticide	2800	Expansion	
	65	Pendimethalin Technical	40487-42-1	600	400	1000	Herbicide	3956	Expansion	
	66	Phenthoate Technical	2597-03-7	400	100	500	Insecticide	435	Expansion	
	67	Permethrin Technical	51218-49-6	250	250	500	Insecticide	383	Expansion	
	68	Pretilachlor Technical	51218-49-6	100	400	500	Herbicide	2200	Expansion	
	69	Pyrazosulfuron-ethyl Technical (97%)	93697-74-6	25	25	50	Herbicide	> 5000	Expansion	
	70	Sulfosulfuron Technical	141776-32-1	20	30	50	Herbicide	> 5000	Expansion	
	71	Tricyclazole Technical	41814-78-2	200	100	300	Fungicide	250	Expansion	
	72	Transfluthrin Technical	118712-89-3	60	90	150	Insecticide	> 5000	Expansion	
	73	Thiamethoxam Technical	153719-23-4	600	400	1000	Insecticide	1563	Expansion	
	74	Tebuconazole Technical (93%)	107534-96-3	100	500	600	Fungicide	1700	Expansion	
	75	Flumethrin Technical	69770-45-2	15	15	30	Insecticide	500-1000	Expansion	
	76	Imiprothrin Technical	72963-72-5	8	12	20	Insecticide	2400	Expansion	
	77	Metofluthrin Technical	240494-70-6	4	18	22	Insecticide	> 2000	Expansion	

Sr. No.	EC Conditions									Compliance Status
	78	Flumethric Acid	88419-72-1	15	35	50	[illegible] mediate	> 5000	Expansion	
	79	Propoxy Ethyl Chloride	42149-74-6	100	100	200	[illegible] mediate	204	Expansion	
	80	Fenvalerate Technical	51630-58-1	200	0	200	Insecticide	451	No Change	
	81	Hexaconazole Technical	79983-71-4	150	0	150	Fungicide	> 2000 (Dermal)	No Change	
	82	m-Phenoxybenzyl Alcohol	13826-35-2	400	0	400	Inter-mediate	1496	No Change	
	83	Myclobutanil Technical	88671-89-0	15	0	15	Fungicide	1600	No Change	
	84	Prallethrin Technical	23031-36-9	25	0	25	Insecticide	640	No Change	
	85	Profenofos Technical	41198-08-7	200	0	200	Insecticide	358	No Change	
	86	Propiconazole Technical	60207-90-1	150	0	150	Fungicide	1517	No Change	
	87	Cloquintocet-mexyl Technical (safener Technical)	99607-70-2	50	0	50	Herbicide	> 2000	No Change	
	88	Temephos Technical	3383-96-8	50	0	50	Insecticide	1000	No Change	
	89	Triclopyr Technical	55335-06-3	50	0	50	Herbicide	630	No Change	
	90	Methanesulfonamide, N-(2-	53718-42-6	50	0	50	Inter-mediate	[illegible]	No Change	

Sr. No.	EC Conditions	Compliance Status

	cyanophenyl)-1,1,1-trifluoro (TSBN)						(Mouse)	
91	Amitraz Technical	33089-61-1	60	0	60	Insecticide	400	No Change
92	Bromobenzene	108-86-1	250	0	250	medi ate	2383	No Change
93	Buprofezin Technical	69327-76-0	140	(-140)	0	Insecticide	2198	Discontinue
94	Chlorpyrifos Technical	2921-88-2	910	(-910)	0	Insecticide	135-163	Discontinue
95	Dichlorvos Technical	62-73-7	150	(-150)	0	Insecticide	435	Discontinue
96	Glyphosate Technical	1071-83-6	50	(-50)	0	Herbicide	> 5000	Discontinue
97	Paraquat Technical	4685-14-7	43	(-43)	0	Herbicide	113	Discontinue
98	Triazophos Technical	2407-47-8	100	(-100)	0	Insecticide	> 2000 (skin & eye)	Discontinue
Total			**12300**	**16900**	**29200**			
Formulation Products								
1.	Pesticide Formulation (Solid)	--	6000	0	6000	--	--	No Change
2.	Pesticide Formulation (Liquid)	--	6000	0	6000	--	--	No Change
Note: # Pilot products shall be carried out for the betterment of proposed products (Sr. No. 1 to 37) only. Hence, Total Pollution load from pilot products shall be disposed to common incinerator.								

4.	Existing Land Area is 105106.75 sqm. No Additional land area will be required. Industry has already developed greenbelt in an area of 33.10% i.e. 34792.00 sqm. Out of total area of the project. The estimated project Cost is Rs. 200	**Complied.** During the site visit it was observed that unit has already developed greenbelt in an area of 33.10 % i.e. 34792.00 m^2 out of total area of the project.

Sr. No.	EC Conditions	Compliance Status
	Crore (for expansion only) & existing investment is Rs.90.15 Crore. Total cost earmarked towards environmental pollution control measures is Rs. 16 Crore and the recurring cost (operation and maintenance) will be about Rs. 27.20 Crore per annum (for expansion only). Total employment will be of 1500 persons after expansion.	It is a continuous process as more than 6500 plants have been planted. - Total Plant area – 105000 M2 - Total Build-up Plot area – 45714 M2 - Total Greenbelt area – 34792 M2 The project proponent has assured that area earmarked as green belt area is used only for tree plantation and will not be altered for any other purpose. The photographs of greenbelt existing within the premises is given below: Environment Budget Allocation Sheet is given below.

As per the records furnished it was observed that unit has committed to allot separate fund of Rs. 16 crore for environmental pollution control measures, management and monitoring and they further agreed that this fund will not be diverted for any other purpose. The details of EMP cost is given below:

Sr. No.	Particulars	Capital Cost for expansion (Rs. In lakh)	Basis of cost estimation	Additional Recurring Cost Per Annum (Rs. In lakh)	Basis of cost estimation
1	Air Pollution Control	150	ESP for new boiler, Bag filter for TFH, Scrubber systems for process gas emission control, Installation of stacks with platform and sampling arrangements, local exhaust and dust collector systems	70	Power and material consumption of APCM, manpower costs, maintenance of APCM systems
2	Water Pollution Control	1100	New Effluent treatment plant, MEE, Effluent drainage network for new plants, drains around plants and storages, new STP	2200	Treatment cost, pumping costs, Discharge charges, manpower costs, power consumption, maintenance costs

Sr. No.	EC Conditions				Compliance Status	
	3	Noise Pollution Control	5	Acoustic enclosures for utility housing, D.G set	0.1	Noise monitoring
	4	Env. Monitoring & Management	150	Installation of online monitoring systems, detectors, augmenting inhouse monitoring and analytical facilities, third party monitoring arrangements, LDAR	20	EMS cell activities, environmental audits, compliance audits, statutory compliances, third party monitoring expenses, service and calibration of online monitoring systems
	5	Occupational Health & Safety	50	Additional fire extinguishers, augmenting Fire hydrant system, PPE and augmentation / upgradation of OHC	20	Medical examinations and FMO charges, OHC expenses, safety equipment testing and services
	6	Green Belt enhancement & Maintenance	50	Filling new soil having proper composition and furnishing it with conditioners and micronutrients & additional Plantation at green belt areas	10	Maintaining the greenbelt by hiring agency, irrigation and fertilizer, pesticides Costs
	7	Solid waste management	95	Augmentation of storage areas for different types of wastes in compliance with the HW rules together with necessary infrastructure and equipment for collection and transport	400	Manpower costs, transportation costs, charges for disposal at common disposal facilities
		TOTAL :-	**1600**		**2720.1**	
5.	Total water requirement is 3122 m³/day of which fresh water requirement of 1512 m³/day will be met from GIDC supply. Industrial Effluent of 1815 m³/day will be treated through Effluent Treatment Plant (ETP). 150 m³/day cooling tower blow down will be treated through RO/Filtration and approx... 130 m³/day RO permeate shall be used as make up water for cooling tower. 20 m³/day RO reject shall be treated in MEE system. 800 m³/day industrial effluent will be treated through pre-treatment, stripper and MEE system. 760 m³/day MEE condensate and 865 m³/day industrial effluent shall be treated in ETP. 783 m³/day ETP treated effluent will be treated through RO, MEE and approximately 564 m³/day RO permeate and 209				**Partly Complied.** As per the records furnished during the site visit it was observed that unit has maintained the data for water consumption and industrial effluent generation within the premises. It is directed to maintain proper logbook for record keeping. The data management was not satisfactory. The details of water consumption for the period of June 2022 to November 2022 is provided below:	

GIDC Water consumption from June-22 to Nov-22	
Month	**KL/Month**
Jun-22	3072

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td>m³/day MEE condensate shall be used as make up water in Boiler. Treated effluent (837 m³/day) from ETP shall be passed through cartridge filter and 700 KLD shall be used for processing, APCM and washing purpose and 137 KLD shall be used as cooling tower make up Domestic effluent of 100 m³/day will be treated through Sewage treatment Plant. (STP)</td><td>
<table>
<tr><td>Jul-22</td><td>8845</td></tr>
<tr><td>Aug-22</td><td>11759</td></tr>
<tr><td>Sep-22</td><td>10515</td></tr>
<tr><td>Oct-22</td><td>12963</td></tr>
<tr><td>Nov-22</td><td>13472</td></tr>
<tr><td>Min</td><td>3072</td></tr>
<tr><td>Max</td><td>13472</td></tr>
<tr><td>Average KL/Month</td><td>10104</td></tr>
<tr><td>Average KL/Day</td><td>326</td></tr>
</table>
Above data infers that water consumption during the compliance period varies between 102.4 KL/day – 449.1 KL/day while the average quantity is found to be 326 KL/day which is well within the prescribed limit i.e. 1512 KL/day.

It was observed that effluent stream are segregated into High TDS/COD, Low TDS/COD, and Domestic waste. However High TDS/COD stream has been treated in Stripper column followed by MEE and ATFD. Dilute stream having low TDS/COD has been treated in Biological system followed by MBR and Reverse Osmosis (RO) Plant. RO Permit water has been recycle in Cooling tower make up in utility. Domestic waste has been treated separately in STP plant. After treatment wastewater is disposed to GIDC sewer line a pumping station-A1 through online TOC monitoring system.

It is advised to renovate the entire ETP and submit EMS adequacy certificate for the same. The existing infrastructure of ETP seems inefficient in treating waste water.

General housekeeping must be strengthened near the RO area, ATFD, salt handling area and MEE.

As per the records furnished it was observed that unit needs to strengthen the logbook for recording data of ETP, chemical consumption in effluent treatment; quantity & quality of final effluent discharges at project site. Further, it was informed that the records for the same are furnished to Regional Office, GPCB and also updated on XGN website in monthly patrak time to time.

<table>
<tr><th colspan="5">High TDS/COD Effluent Generation Data of June-22 to Nov-22</th></tr>
<tr><th rowspan="2">Month</th><th rowspan="2">Total in KL</th><th>Min</th><th>Max</th><th rowspan="2">Avg.</th></tr>
<tr><th colspan="2">KLD</th></tr>
<tr><td>Jun-22</td><td>357</td><td>0</td><td>131</td><td>66</td></tr>
<tr><td>Jul-22</td><td>2797</td><td>2</td><td>122</td><td>62</td></tr>
</table>
</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status

Aug-22	3320	86	142	114
Sep-22	2960	69	120	95
Oct-22	2951	68	100	84
Nov-22	2832	84	109	97

Above data infers that High TDS/COD effluent generated during the compliance period varies between 0 – 142 KL/day while the average quantity is found to be 85 KL/day which is well within the prescribed limit.

Low TDS/COD Effluent Generation Data of June-22 to Nov-22

Month	Total in KL	Min	Max	Avg.
		KLD		
Jun-22	887	30	237	134
Jul-22	6337	99	288	194
Aug-22	7327	177	286	232
Sep-22	7115	122	303	213
Oct-22	7127	76	288	182
Nov-22	7173	187	287	237

Above data infers that low TDS/COD effluent generated during the compliance period varies between 30 KL/day – 303 KL/day while the average quantity is found to be 200 KL/day which is well within the prescribed limit.

STP Effluent Generation Data for the month of June-22 to Nov-22

Month	TOTAL in KL	Min	Max	Avg.
		KLD		
Jun-22	1084	3	71	37
Jul-22	2265	36	103	70
Aug-22	1833	33	93	63
Sep-22	1864	29	102	66
Oct-22	1353	24	61	43
Nov-22	1443	26	84	55

Above data infers that domestic effluent generated during the compliance period varies between 3 – 103 KL/day while the average quantity is found to be 55 KL/day which is well within the prescribed limit i.e. 100 KL/day.

The unit has installed a very efficient STP.

Final Treated Effluent Discharge to GIDC from June-22 to Nov-22

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th rowspan="2">Month</th><th rowspan="2">Total in KL</th><th>Min</th><th>Max</th><th>Avg.</th></tr>
<tr><th colspan="3">KLD</th></tr>
<tr><td>Jun-22</td><td>107</td><td>0</td><td>45</td><td>23</td></tr>
<tr><td>Jul-22</td><td>2294</td><td>0</td><td>138</td><td>69</td></tr>
<tr><td>Aug-22</td><td>1936</td><td>0</td><td>127</td><td>64</td></tr>
<tr><td>Sep-22</td><td>1457</td><td>0</td><td>139</td><td>70</td></tr>
<tr><td>Oct-22</td><td>648</td><td>0</td><td>86</td><td>43</td></tr>
<tr><td>Nov-22</td><td>736</td><td>0</td><td>70</td><td>35</td></tr>
</table>
Above data infers that final treated effluent discharged during the compliance period varies between 0 – 139 KL/day while the average quantity is found to be 39 KL/day which is well within the prescribed limit.

The unit is directed to submit GIDC permission letter for water consumption and final discharge to this office.
</td></tr>
<tr><td>6.</td><td>Power requirement after expansion will be 7000 KVA including existing 25 KVA and will be met from Dakshin Gujarat Vij Company Ltd. (DGVCL). Existing unit has 2 Nos. DG set of 750 KVA capacity of each, additionally 2 Nos. DG sets of 1500 KVA Of each will be used as standby during power failure for proposed expansion. Existing 1 No. DG set of 750 KVA shall be discontinued after expansion. Stack (15 m height) will be provided as per CPCB norms. Existing unit has Multi fuel boilers (1 No. 18 MT/h & 1 No. 12 MT/h standby) and Thermic Fluid Heaters (2 Nos.4 Lakh kcal/h each- 1 operational + 1 standby). Additionally, multi fuel boiler (1 No.25 MT/h) and Thermic Fluid Heaters (2 Nos. 4 lakh kcal/h each) will be installed. ESP shall be provided to Boilers and Bag Filter shall be continuous monitoring. Natural gas OR Furnace Oil & Coal is used as Fuel for MFBs & TFHs, HSD is used as Fuel for DG Set and same will be used after expansion.</td><td>
Partly Complied.

As per the records furnished during the site visit it was observed that unit has maintained proper logbook of power consumption, fuel consumption, etc. at project site. Further, it was informed that the records for the same are furnished to Regional Office, GPCB and also updated on XGN website in monthly patrak time to time.

The details of power consumption for the period of June 2022 to November 2022 is provided below:
<table>
<tr><th colspan="2">Power consumption for the month of June-22 to Nov-22</th></tr>
<tr><th>Month</th><th>KW</th></tr>
<tr><td>Jun-22</td><td>113754</td></tr>
<tr><td>Jul-22</td><td>1643881</td></tr>
<tr><td>Aug-22</td><td>2109252</td></tr>
<tr><td>Sep-22</td><td>2047539</td></tr>
<tr><td>Oct-22</td><td>2160896</td></tr>
<tr><td>Nov-22</td><td>2013710</td></tr>
<tr><td>Min</td><td>113754</td></tr>
<tr><td>Max</td><td>2160896</td></tr>
<tr><td>Average</td><td>1681505.333</td></tr>
</table>
Above data infers that power consumption during the compliance period varies between 113754 KW/Month – 2160896 KW/Month while the average quantity is found to be 1681505.33 KW/Month which is found to be exceeding the prescribed limit.

The unit is directed to submit the reason for increase in power consumption from July 2022 to November 2022 with
</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status
		supporting document to this office. The details of fuel consumption for the period of June 2022 to November 2022 is provided below: **Fuel consumption for the month of June-22 to Nov-22** **Month** / **Coal (MT)** / **H.S.D(LTS)** Jun-22 / 116 / 35380 Jul-22 / 1282 / 572 Aug-22 / 1438 / 784 Sep-22 / 1261 / 2341 Oct-22 / 1380 / 5134 Nov-22 / 1446 / 334 **Min** / **116** / **334** **Max** / **1446** / **35380** **Average** / **1154** / **7424** It was observed that ESP is provided with boiler, bag filter is provided with TFH and all process vent are connected with scrubber. The unit has installed lime dosing facility to mix lime with the coal in required proportion as an additional measure. As per the records furnished it was observed that stack and vent monitoring for the compliance period of June 2022 to November 2022 is carried out by third party laboratory (M/s. Siddhi Green Env. Consultancy) and results for the same is given below: **Month of Jun-2022 to Nov-2022 Boiler Stack** **Parameter** / **Result** (**Min** / **Max** / **Avg**) / **GPCB Norms** PM / 81 / 129 / 105 / 150 mg/Nm^3 SO2 / 50 / 62 / 56 / 100 ppm Nox / 32 / 36 / 34 / 50 ppm **Month of Jun-2022 to Nov-2022 DG set 1,2 and 3** **Parameter** / **DG set - 1 Result** (**Min** / **Max** / **Avg**) / **DG set - 2 Result** (**Min** / **Max** / **Avg**) / **DG set - 3 Result** (**Min** / **Max** / **Avg**) / **GPCB Norms** PM / 70 / 80 / 75 / 70 / 84 / 77 / 65 / 75 / 70 / 150 mg/Nm^3

Sr. No.	EC Conditions	Compliance Status

SO2	22	26	24	20	23	21.5	15	21	18	100 ppm
Nox	29	35	32	28	34	31	24	30	27	50 ppm

Month of Jun-2022 to Nov-2022 Process Vent - 1				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
HCl	2.5	2.9	2.7	20 mg/Nm^3
Cl2	0.7	1	0.85	5 mg/Nm^3
HBr	BDL	BDL	BDL	5 mg/Nm^3
BR2	BDL	BDL	BDL	2 mg/Nm^3
BDL-Below detection limit				

Month of Jun-2022 to Nov-2022 Process Vent - 2				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
H2S	BDL	BDL	BDL	5 mg/Nm^3
VOC	BDL	BDL	BDL	-
BDL-Below detection limit				

Month of Jun-2022 to Nov-2022 Process Vent - Plant B				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
HCl	1	1.8	1.4	20 mg/Nm^3
SO2	12	20	16	40 mg/Nm^3
H2S	BDL	BDL	BDL	05 mg/Nm^3
BDL-Below detection limit				

Month of Jun-2022 to Nov-2022 Process Vent Plant C				
Parameter	**Result**			**GPCB Norms**
	Min	**Max**	**Avg**	
DMA	BDL	BDL	BDL	-
SO2	13	16	14.5	40 mg/Nm^3
HCl	1	1.1	1.05	20 mg/Nm^3
VOC	BDL	BDL	BDL	-

Sr. No.	EC Conditions	Compliance Status
		BDL-Below detection limit Based on the monitoring report carried out by NABL accredited laboratory, it was inferred that the level of emissions for stack and vent monitoring was well within prescribed limit of GPCB and at no time the level went beyond the permissible limit. **The unit is directed to submit ambient air quality monitoring report carried out during the compliance period to this office.**
7.	The project/activity is covered under category A of item 5 (b) ' Pesticides industry and pesticide specific intermediates (excluding formulations)' of the schedule to the EIA Notification, 2006 and requires appraisal/ approval at Central level in the Ministry.	**Noted.**
8.	The TOR was granted by the Ministry vide letter dated 11 th April, 2019. Public hearing is exempted as per para7 ( ),Stage (3), (i) (b) of the EIA Notification, 2006, and in accordance with the Ministry's OM dated 27th April 2018, as the project site is located in the notified industrial area. No mitigation is pending against the proposal.	**Noted.**
9.	The Ministry had issued EC earlier vide letter No. No. J-11011/961/2008-IA-II(I);dated 13th July,2009 for manufacturing of agrochemicals manufacturing unit in favour of M/S Siris Crop Science Limited, the said EC further transferred to the name of M/s. Bharat Rasayan Limited (Unit-II) on 5 th September, 2012 and amendment in EC granted for product mix change on 5th September,2012. Further, the corrigendum granted on 10th January, 2013. The Certified compliance report dated 2nd July,2019 on the compliance status of the EC condition has been forwarded by the Ministry's Regional Office at Bhopal. Further, the Regional office of the Ministry has Forwarded the Action taken report on partial complied points vide email dated 15th April, 2020. The Committee deliberated the complied report and found in order.	**Noted.** As per the records furnished during the site visit it was observed that EC had already transferred on name of M/s. Bharat Rasayan Limited, CCA from GPCB is also taken on same name, and company is operated with the same name. Certified compliance report issued by MoEF&CC on 28th May, 2020 with 100% compliance.
10.	The Proposal was earlier considered by the EAC in its meeting held during October 2019, February 2020, April 2020 & May, 2020 followed by site visit. The Sub- Committee, in its report recommended for consideration of project for grant of EC with certain actions/compliances.	**Noted.** As per the records furnished during the site visit it was observed that Ministry had issued Environment Clearance vide order No. J-11011 / 961 / 2008-IA – II(I) dated 19th October, 2020

Sr. No.	EC Conditions	Compliance Status
	Based on the complete information submitted by the PP, The proposal was again considered by the EAC in its 22nd meeting held on 17-19 August, 2020 in the Ministry, wherein the project proponent and their consultant M/s. Siddhi Green Excellence Pvt. Ltd. presented the EIA/EMP report as per TOR. The committee found the EIA/EMP report complying with the ToR and recommended the project for grant of environmental clearance.	
11.	The EAC, constituted under the provision of the EIA Notification, 2006 and comprising of Experts Members/domain experts in various fields, have examined the proposal submitted by the Project Proponent in desired form along with EIA/EMP report prepared and submitted by the Consultant accredited by the QCI/NABET on behalf of the project proponent. The EAC noted that Project Proponent has given undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.	**Noted.**
12.	The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environment concerns and the projected scenario for all the environmental components. The Committee has found the baseline data and incremental GLC due to the proposed project within NAAQ standards. Additional information submitted by the project proponent to be satisfactory and addressing the concerns of the committee. The EAC has deliberated the proposal and has made due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC have found the proposal in order and have recommended for grant of environmental clearance.	**Noted.**
13.	The environmental clearance granted to the project/activity is strictly under the provision of	**Noted.**

Sr. No.	EC Conditions	Compliance Status
	the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/Rules/Subordinate Legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (prevention and Control of Pollution) Act, 1974 and the Air (prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.	
14.	Based on the proposal submitted by the project proponent and recommendations of the EAC (Industry-2), Ministry of Environment, Forest and Climate Change hereby accords environmental clearance to the project for Expansion of agrochemicals and their intermediates manufacturing unit from 12,300 TPA to 29,200 TPA by M/s Bharat Rasayan Limited (Unit-II), Located at Plot No. 42/4, Amod Road, Dahej-I GIDC Industrial Estate, Dahej, District Bharuch, Gujarat, under the provision of the EIA Notification, 2006, and the amendments therein, subject to compliance of the terms and conditions as Under:	**Noted.**
A.	**SPECIFIC CONDITION :**	
(i)	The Sub- Committee of EAC has visited the Unit and suggested certain actions/compliances. The Project Proponent shall implement all the recommendations of the Sub-Committee w.r.t. control of emission, layout design, risk assessment & its mitigation measures. The Committee, after deliberation, also recommended that the layout of the project shall be audited by reputed Organization to safeguard of the environment. The audited report shall be submitted before the EAC/Ministry within 6 months.	**Partly Complied.** **It is directed to submit the point wise compliance of suggestions given by sub-committee of EAC.**
(ii)	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented	**Complied.** As per the records furnished during the site visit it was observed that unit has carried out impact assessment for construction & operation phase and taken all the environmental protection measures and safeguards are complied with below actions to mitigate the same.

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>
CONSTRUCTION & OPERATION STAGE POTENTIAL IMPACTS & MITIGATIVE MEASURES
<table>
<tr><th>Environmental Components</th><th>Potential Impacts</th><th>Sources of Impact</th><th>Mitigative Measure</th><th>Status</th></tr>
<tr><td>Water Quality</td><td>Deterioration of water quality</td><td>Construction activity & abstraction of water for construction requirement and sanitation in housing for workers. Discharge of process effluents, sewage and utility wastewater</td><td>Proper management of surface water run off is made.

Effluent treatment plant (ETP)</td><td>Company had installed 200 + 200 KLD + 350 KLD MEE-Stripper & ATFD and 715 KLD of Dilute stream treatment facility consist full fledge ETP, MBR followed by RO plant. Discharge of treated effluent to GIDC drain. Discharge standards specified by authorities are meet to discharge criteria.</td></tr>
</table>
</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status				
		Air Quality	Increase in SO2, NOX, SPM & HCl concentrations in ambient air	Process emissions, Fugitive emissions & Utility stack emissions	Control equipment for fugitive emissions Adequate stack heights & APCE	No remarkable increase in GLCs. NAAQ Standards are met Minor adverse impacts on ambient air quality
		Socio-Economic	Overall growth & development of area, increased employment, improvement in infrastructure and growth of downstream industries	Project activities	General area planning in advance by GIDC and classified as notified industrial estate by GIDC	Beneficial change
		Terrestrial Ecology	Minor loss of habitat-flora & fauna, loss of agricultural land	Project activities	Green belt Proper management of solid waste	No impact
		Noise	Increased noise level	Project operation	Noise abatement at generation point & green belt before receptor	No impact

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Infrastructure & Services</td><td>Improved communication, transport, housing, educational & medical facilities</td><td>Project</td><td>Development has been gradual</td><td>Beneficial impact</td></tr>
<tr><td>Environmental Hazards</td><td>Risk to environment & neighboring population</td><td>Handling and storage of chemicals, solvents & fuels</td><td>On site & off site Disaster management plan & Safe practices</td><td>No impact</td></tr>
</table>
</td></tr>
<tr><td>(iii)</td><td>As already committed by the project proponent, Zero Liquid Discharge shall be ensure within 03 years for existing as well as expansion project and afterwards no waste/treated water shall be discharged outside the premises. All the waste water to be collected and to be reused after treatment.</td><td>Partly Complied.

Kindly refer condition no. 5.

The unit has not discharged any effluent since February. It was informed that they will move to ZLD from October 2023. During the site visit it was informed that unit is committed to implement ZLD within 03 years. The ZLD scheme for the same is given below:</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status

Annexure-2

Water Balance Details

Water Consumption (for Existing & Proposed expansion)

				Fresh water requirement (m3/day)				
				Existing Quantity	Proposed additional quantity	Total Water demand	Water available from recycling and reuse	Final GIDC water consumption
				m3/day	m3/day	m^3/day	m^3/day	m^3/day
(i) Domestic :				50	120	170	0	170
(ii) Industrial	:	(a) Process + APCM	:	455	474	929	773	156
		(b) Boiler	:	300	586	886	0	886
		(c) Cooling	:	200	367	567	Note 1	567
		(d) Washing		354	116	470	0	470
		(e) Gardening	:	60	40	100	Note 2	100
		Domestic	:	**50**	**120**	**170**	**0**	**170**
		Industrial	:	**1369**	**1583**	**2952**	**773**	**2179**
		Total	:	**1419**	**1703**	**3122**	**773**	**2349**

After proposed expansion, Total fresh water consumption shall be reduced as unit is going to ZLD for proposed quantity & Recycled water (773 KLD) shall be used in Process + APCM + Washing. Approximately 45 KLD will be used for recovery purpose (MEE utility).

Note 1: Cooling tower blowdown (150 KLD) shall be passed through RO/Filtration and 130 KLD RO permeate reused for cooling tower makeup & RO reject sent to MEE for further treatment.

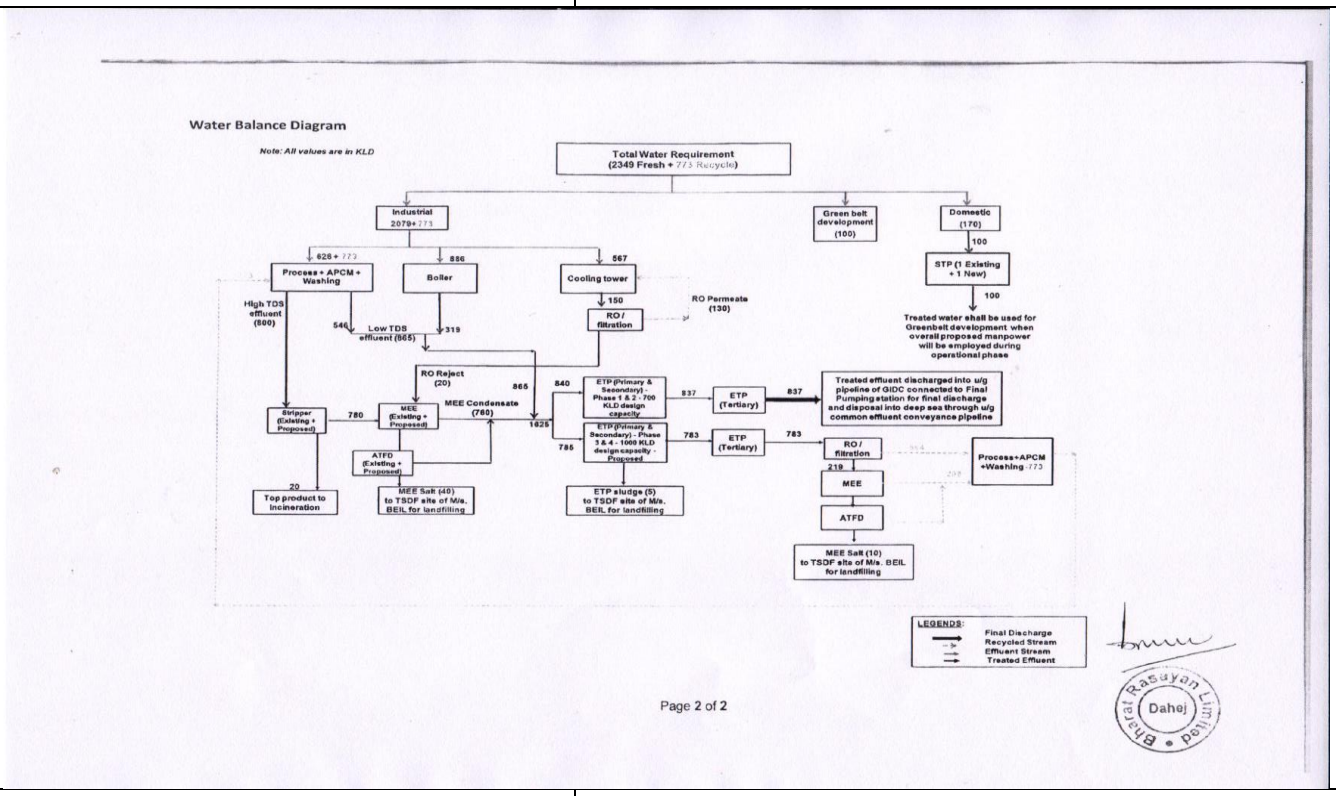
Note 2: 100 KLD sewage water will be treated in STP & treated water shall be used for Greenbelt development when overall proposed manpower will be employed during operational phase.

Waste Water Generation (for Existing & Proposed expansion)

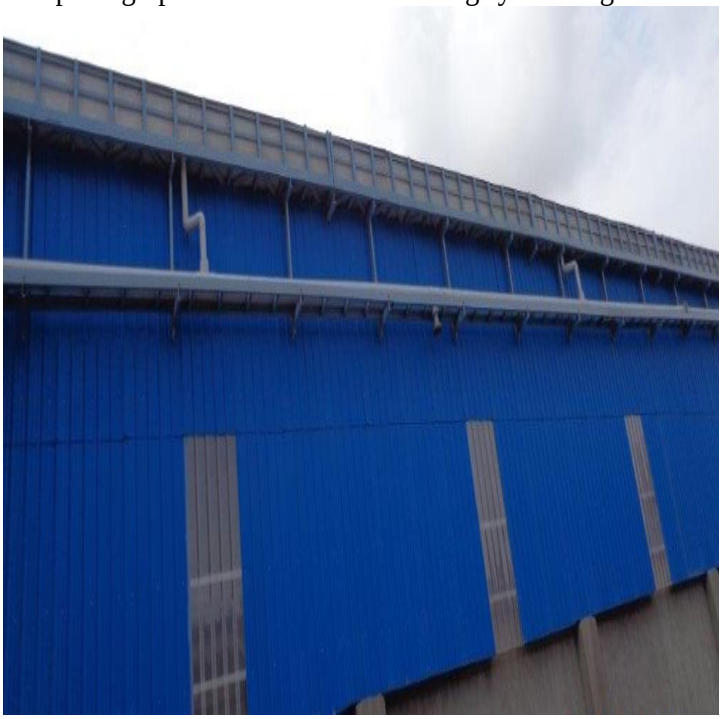
				Wastewater generation (KL/Day)		
				Existing Quantity	Proposed additional quantity	Total Quantity
(i) Domestic	:			40	60	100
(ii) Industrial		(a) Processing + APCM + Washing	:	822	479	1301
		(b) Boiler + Contaminated steam	:	15	304	319
	:	(c) Cooling	:	Note 1	Note 1	Note 1
		Domestic	:	**40**	**60**	**100**
		Industrial	:	**837**	**783**	**1620**
		Total	:	**877**	**843**	**1720**

Note 1: Cooling tower blowdown shall be passed through RO/Filtration and reused for cooling tower makeup.

Bharat Rasayan Limited Dahej

Sr. No.	EC Conditions	Compliance Status
	 Water Balance Diagram Note: All values are in KLD Total Water Requirement (2349 Fresh + 773 Recycle) Industrial 2079+773 Green belt development (100) Domestic (170) 100 STP (1 Existing + 1 New) 100 Treated water shall be used for Greenbelt development when overall proposed manpower will be employed during operational phase 626 + 773 886 567 Process + APCM + Washing Boiler Cooling tower 150 RO / filtration RO Permeate (130) High TDS effluent (800) 546 Low TDS effluent (865) 319 RO Reject (20) 865 840 ETP (Primary & Secondary) - Phase 1 & 2 - 700 KLD design capacity 837 ETP (Tertiary) 837 Treated effluent discharged into u/g pipeline of GIDC connected to Final Pumping station for final discharge and disposal into deep sea through u/g common effluent conveyance pipeline Stripper (Existing + Proposed) 780 MEE (Existing + Proposed) MEE Condensate (760) 1625 785 ETP (Primary & Secondary) - Phase 3 & 4 - 1000 KLD design capacity - Proposed 783 ETP (Tertiary) 783 RO / filtration 219 Process+APCM +Washing 773 MEE ATFD MEE Salt (10) to TSDF site of M/s. BEIL for landfilling ATFD (Existing + Proposed) 20 Top product to incineration MEE Salt (40) to TSDF site of M/s. BEIL for landfilling ETP sludge (5) to TSDF site of M/s. BEIL for landfilling LEGENDS: Final Discharge Recycled Stream Effluent Stream Treated Effluent Page 2 of 2 Bharat Rasayan Limited Dahej	
(iv)	Total fresh water requirement shall not exceed 1512 cum/day, proposed to be met from GIDC. Necessary permission obtained in this regard shall be renewed from time to time. The fresh water demand shall be reduced by 10% using rain water harvesting system	**Complied.** Kindly refer condition no. 5. During the site visit it was observed that rain water harvesting system has been installed & put in operation and details for the same is given below.

Old RMS	AREA	M2	Water Harvest in KL
	(50Mx50M)	2500	1875
New RMS	AREA	M2	Water Harvest in KL
	(50Mx26M)	10	975
New Admin	AREA	M2	Water Harvest in KL
	(20Mx20M)	400	300
Main Gate /OHC/Bath room	AREA	M2	Water Harvest in KL
	(30Mx15M)	450	337.5
Note: Considering 30 inch rain per year			

Sr. No.	EC Conditions	Compliance Status
		The photographs of rain water harvesting system is given below: 
(v)	As proposed 0.75 % of the total project cost shall be allocated towards Corporate Environment	**Partly Complied.**

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td>Responsibility (CER). As proposed, the CER allocation shall be spent mainly for education including education/skill development/solar lights, etc., and shall be completed within 5 years. The amount proposed in CER shall be spent during execution of the project and shall not be linked with the CSR</td><td>During the site visit it was informed that in accordance with MoEF&CC's OM dated 01/05/2018 regarding ''Corporate Environment Responsibility'' (CER), Brownfield projects having investment >100 crores have to contribute 0.75% of the Capital investment. Accordingly, proponent has committed to allocated to Rs. 1.5 crores for CER activities which is to be conducted after the project is operational.

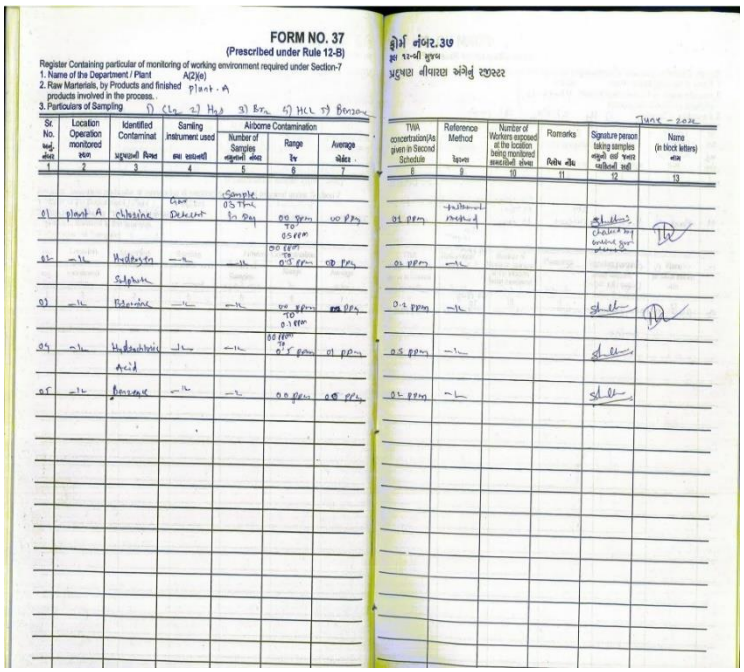
Tentative CER Activities
<table>
<tr><th>Sr. no.</th><th>Description</th></tr>
<tr><td></td><td>Infrasructure</td></tr>
<tr><td>1</td><td>Installation / Repair / Service of RO plant</td></tr>
<tr><td>2</td><td>Tree Plantation on village boundary and pond boundary</td></tr>
<tr><td>3</td><td>Providing paverblocks on internal roads of surrounding villages or constructing RCC roads</td></tr>
<tr><td>4</td><td>Storm water drainage improvement</td></tr>
<tr><td>5</td><td>Providing LED street light</td></tr>
<tr><td></td><td>Education & Training</td></tr>
<tr><td>6</td><td>Repair and construction work for schools</td></tr>
<tr><td>7</td><td>Training and guidance to farmers</td></tr>
<tr><td>8</td><td>Scholarships for higher education</td></tr>
<tr><td>9</td><td>Transport facility to school and college students</td></tr>
<tr><td></td><td>Health</td></tr>
<tr><td>10</td><td>Medical camp in nearby villages</td></tr>
<tr><td>11</td><td>Contribution to GIDC for health programme for workers</td></tr>
<tr><td></td><td>Amenities and Sanitation</td></tr>
<tr><td>12</td><td>Overhead tank construction / tapwater facility</td></tr>
<tr><td>13</td><td>Donation to schools and hospitals for improving drinking water, sanitation facilities and solar electrification</td></tr>
<tr><td>14</td><td>Pond restoration</td></tr>
</table>
It is directed to submit the expenditure under respective heads over last 2 years along with relevant documents and photographs. The donations given to organizations were also accounted for CER without any details.</td></tr>
<tr><td>(vi)</td><td>For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.</td><td>Complied.

During the site visit it was observed that acoustic enclosures are provided with DG set for controlling the noise pollution within the premises. It is directed to submit the stack monitoring report of DG set.</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status
(vii)	Continuous online (24*7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For ZLD, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.	**Complied.** During the site visit it was observed that for existing operating continuous on line (24*7) monitoring system for stack emissions and of treated water and its discharge from plant is being done and online data is transmitted to CPCB/GPCB server.

Sr. No.	EC Conditions	Compliance Status
		   The project proponent has assured that other conditions will be fulfilled when ZLD will be followed. **The unit has not discharged any effluent since February. It was informed that they will move to ZLD from October 2023. The unit is directed to submit action plan with timeline and budgetary expenses to achieve ZLD from the premises.**
(viii)	Fugitive emissions shall be controlled at 99.98% with effective chillers. Volatile organic Compounds (VOCs)/Fugitive emissions shall be Controlled at 99.9975 with effective chillers/modern technology.	**Complied.** During the site visit it was observed that unit has provided two stage condenser system for the process vessels (primary condenser with cooling water and secondary condenser with chilled brine) where solvent recovery operations are carried out. All the solvent tanks are having breather valve and tank vents and condensers are connected to the chillers. All the solvent operations are been in closed loop to prevent losses. Further to control fugitive emissions, unit has installed pumps with carbon phased mechanical seals with O ring and monitoring the total VOCs with ION Science meter. The unit has been provided with chilled brine based condensers

Sr. No.	EC Conditions	Compliance Status
		The Form No. 37 are also attached herewith:

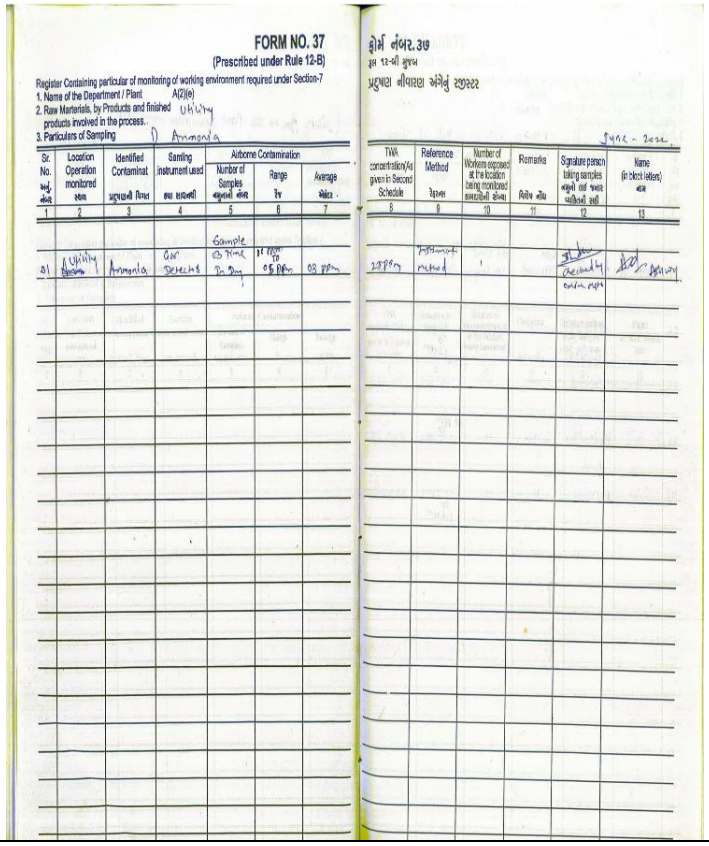


FORM NO. 37
(Prescribed under Rule 12-B)

Register Containing particular of monitoring of working environment required under Section-7
1. Name of the Department / Plant A(2)(e)
2. Raw Marterials, by Products and finished products involved in the process. plant - A
3. Particulars of Sampling 1) Cl2 2) H2S 3) Br2 4) HCl 5) Benzene

Sr. No.	Location Operation monitored	Identified Contaminat	Samling instrument used	Airborne Contamination: Number of Samples	Range	Average
1	2	3	4	5	6	7
01	plant A	chlorine	Gas Detect	Sample 03 Time In Day	0.3 ppm to 0.5 ppm	0.0 ppm
02	-"-	Hydrogen Sulphide	-"-	-"-	00 ppm to 0.1 ppm	00 ppm
03	-"-	Bromine	-"-	-"-	00 ppm to 0.1 ppm	00 ppm
04	-"-	Hydrochloric Acid	-"-	-"-	00 ppm to 0.5 ppm	01 ppm
05	-"-	Benzene	-"-	-"-	00 ppm	00 ppm

Sr. No.	TWA concentration(As given in Second Schedule	Reference Method	Number of Workers exposed at the location being monitored	Remarks	Signature person taking samples	Name (in block letters)
1	8	9	10	11	12	13
01	01 ppm	National method				
02	01 ppm	-"-				
03	0.1 ppm	-"-				
04	0.5 ppm	-"-				
05	01 ppm	-"-				

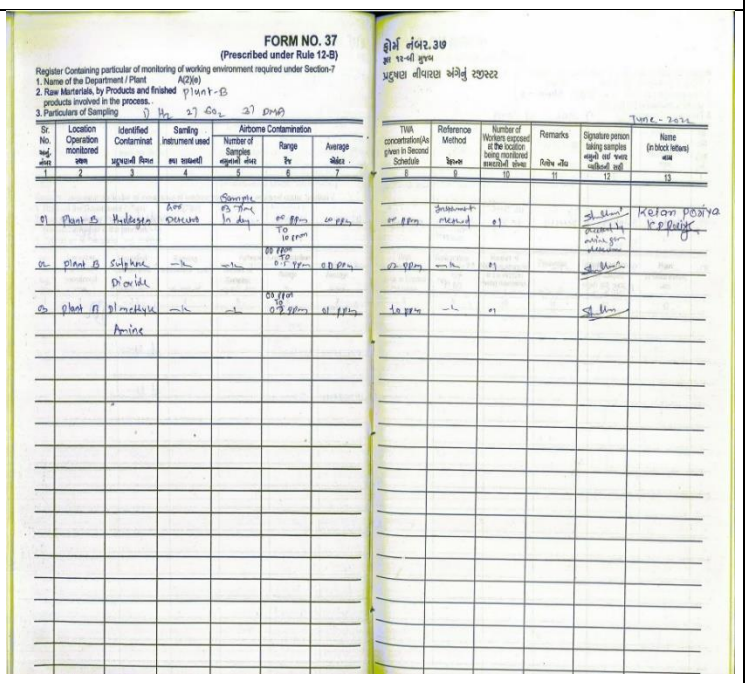


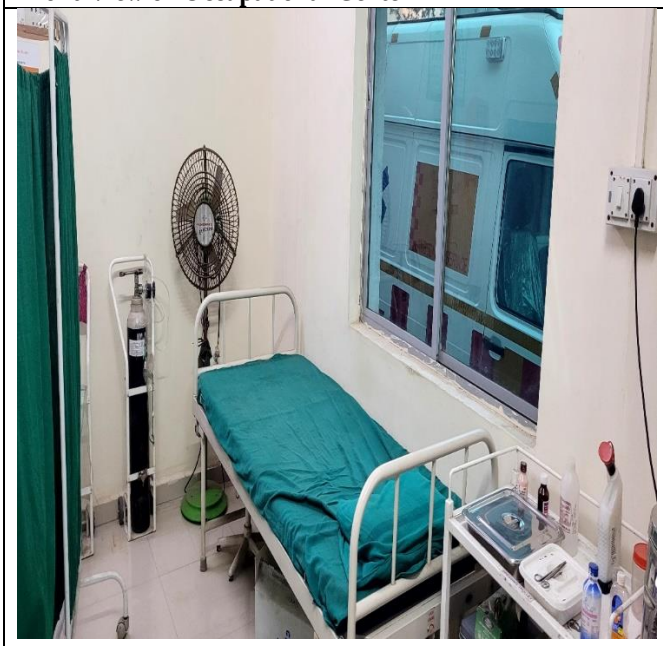
FORM NO. 37
(Prescribed under Rule 12-B)

Register Containing particular of monitoring of working environment required under Section-7
1. Name of the Department / Plant A(2)(e)
2. Raw Marterials, by Products and finished products involved in the process. Utility
3. Particulars of Sampling 1) Ammonia

Sr. No.	Location Operation monitored	Identified Contaminat	Samling instrument used	Airborne Contamination: Number of Samples	Range	Average
1	2	3	4	5	6	7
01	Utility Area	Ammonia	Gas Detects	Sample 03 Time In Day	01 ppm to 05 ppm	02 ppm

Sr. No.	TWA concentration(As given in Second Schedule	Reference Method	Number of Workers exposed at the location being monitored	Remarks	Signature person taking samples	Name (in block letters)
1	8	9	10	11	12	13
01	25 ppm	National method				

Sr. No.	EC Conditions	Compliance Status
		 FORM NO. 37 (Prescribed under Rule 12-B) Register Containing particular of monitoring of working environment required under Section-7 1. Name of the Department / Plant A(2)(e) 2. Raw Materials, by Products and finished products involved in the process. Plant-B 3. Particulars of Sampling ફોર્મ નંબર.૩૭ રૂલ ૧૨-બી જુઓ પ્રદુષણ નીયંત્રણ અંગેનું રજીસ્ટર June - 2022
(ix)	Occupational health center for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.	**Complied.** During the site visit it was observed that unit has developed occupational health center and occupational health surveillance of the all workers on a regular basis is carried out and records are maintained as per the Factories Act & Rules. Pre-employment and periodical and medical examination for all workers is undertaken as per legal requirement. It was also observed that unit has provided personal protective equipment (PPE) to the workers, kept emergency stock for the same and its proper usage is ensured and supervised regularly by the management. PPE is inspected frequently to ensure that it is in good condition. Frequency of checking is decided depending upon the usage. The photograph of occupational health center is given below:

Sr. No.	EC Conditions	Compliance Status
	 Front View of Occupational Center	 **Photograph of Ambulance**
	 **Bed for Patient**	 **Male Nurse of OHC**
(x)	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire- fighting	**Complied.** During the site visit it was observed that firefighting system are provided in storage area and maintained to cope with emergency,

Sr. No.	EC Conditions	Compliance Status
	system shall be as per the norms	in case of any fire accident occurring in the premises. The unit has adequate arrangement for protection from possible fire hazard and the details of fire and safety arrangement is given below: **DETAILS OF FIRE AND SAFETY ARRANGEMENT FOR PROTECTION OF POSSIBLE FIRE HAZARDS** **Details of Fire Hydrant System**

Sr. No	Name Of Pump	Capacity	Head	Starting (on) water Pressure
1	Main pump	273 m3/hr	70M	5 kg/cm2
2	Diesel pump	273 m3/hr	70M	4 kg/cm2
3	jockey pump	10.8 m3/hr	70M	6 kg/cm2

Details of EHS Equipment List

Sr. No	Equipment List	Quantity
1	Fire escape hydrant	47 Nos
2	Water Monitor	05 Nos
3	Water / Foam Monitor	11 Nos
4	Hose Reel Hose	51 Nos
5	Water Sprinkler system	05 Nos
6	Chemical Spill Kit	07 Nos
7	Foam Trolley	11 Nos
8	Chlorine kit (cl2)	02 nos
9	SCBA Set	15 nos
10	Foam Solution (AFFF)	5500 ltr
11	Exp. Meter (potable)	02 nos
12	Oxygen Meter (potable)	01 nos
13	VOC Meter	01 nos
14	Safety Net	20 nos
15	Fire Blanket	20 nos
16	Total D.C.P Fire Exiting.	126 nos
17	Total Foam Fire Exiting.	105 nos
18	Total Co2 Fire Exiting.	97 nos
19	Total Fire Extinguisher in safety office	43 nos
20	Total D.C.P Fire Exiting.	126 nos
21	Sand Drum	22 nos

Total Foam Solution Details in Plant

Sr. No.	Location	Quantity
1	Safety Office	1000 Ltr in stock
2	Plant-A	500 Ltr.
3	Plant-B	500 Ltr.
4	Plant-C	400 Ltr.
5	Plant-D	800 Ltr.
6	Solvent Storage Area	500 Ltr.

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>7</td><td>R.M Store</td><td>200 Ltr.</td></tr>
</table>
</td></tr>
<tr><td>(xi)</td><td>Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.</td><td>
Complied.

During the site visit it was informed that training is provided to different department i.e. Engineering, Production, EHS, Maintenance, Account & Security as per requirement.

The training is given on the following subjects;
• Accident Prevention Technique
• Basic fire fighting
• Use of PPE
• Handling of Hazardous chemicals
• First Aid program
• General safety regulation
• Electrical safety
• On site emergency plan training

The details of training records for the compliance period is as below:
<table>
<tr><th>SR NO</th><th>Month</th><th>No. of Safety Training</th><th>No of Participants</th><th>Total Man Hours</th></tr>
<tr><td>1</td><td>Jun-22</td><td>82</td><td>810</td><td>534</td></tr>
<tr><td>2</td><td>Jul-22</td><td>70</td><td>554</td><td>220</td></tr>
<tr><td>3</td><td>Aug-22</td><td>85</td><td>1369</td><td>684</td></tr>
<tr><td>4</td><td>Sep-22</td><td>111</td><td>1388</td><td>694</td></tr>
<tr><td>5</td><td>Oct-22</td><td>118</td><td>1354</td><td>677</td></tr>
<tr><td>6</td><td>Nov-22</td><td>112</td><td>1289</td><td>644</td></tr>
<tr><td colspan="2">Total</td><td>578</td><td>6764</td><td>3453</td></tr>
</table>
</td></tr>
<tr><td>(xii)</td><td>Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/any wastewater shall not be allowed to mix with storm water.</td><td>
Complied.

Kindly refer specific condition no. iv.

During the site visit it was informed that their process drain and storm water drain are separated and storm water drain found in dry and clean condition. The unit had already installed mechanical sluice gate valve which was found in closed condition.

The storage tanks are located in plant premises which are already covered by acid proof tile lining and dyke wall are also installed. The unit has made provision of motor pump for transferring the waste water.

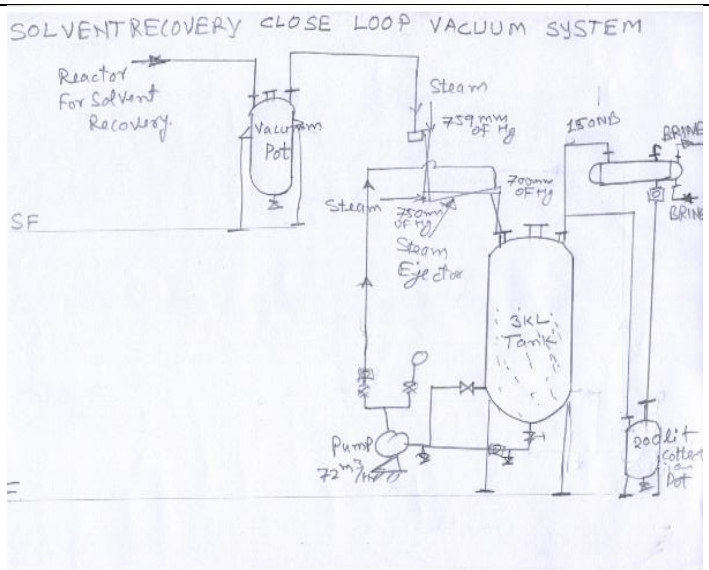
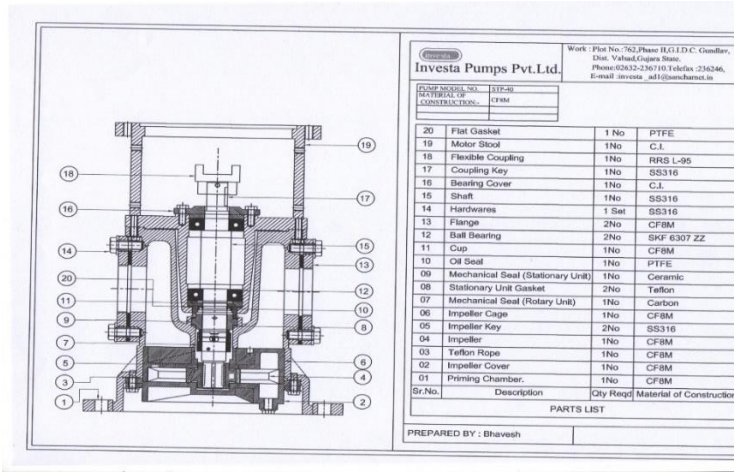
The unit has also constructed masonry bund wall as a prevention. Masonry bund wall will be opened only in monsoon after conforming parameter. Storm water return arrangement to ETP is
</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status
		rm ter

Sr. No.	EC Conditions	Compliance Status
(xiii)	Solvent management shall be carried out as Follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and Solvent handling pump shall have mechanical seals to prevent leakages.(c) Solvents shall be stored in a separated space specified with all safety measures. (d) Proper earthling shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The Solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	**Complied.** During the site visit it was observed that unit has implemented followings measures for solvent management within the premises: A. The unit has their own utilities and provided brine/chilling condenser and column to reactors. B. All the pumps installed in plants are having standard mechanical seal. C. The condensers are having sufficient Heat Transfer Area (HTA) and recovery more than 95% is achieved. D. Solvent are stored in a separate space specified with all safety measures. E. Proper earthing are provided in all the electrical equipment wherever solvents handling are done. F. All plant area has been flame proof and the solvent storage tanks are provided with breather valve to prevent losses as per PESO guideline.

Sr. No.	EC Conditions	Compliance Status

Sr. No.	EC Conditions	Compliance Status
		    All the chemicals are stored (as per PESO requirements) in storage tanks under negative pressure to avoid any leakages. The unit has been provided with the spark arrestor, breather system, N2 Blanketing, condensers and chilling for all the tanks to minimize vapour losses. Drums/carboys lids are being tightened properly. The unit has been provided with the closed handling systems for chemicals & solvents.

Sr. No.	EC Conditions	Compliance Status
		 The unit has provided multi spring, carbon phase, silicon carbide, o ring and gasket seals for pumps and agitators. The unit is storing most of liq. RM in tanks and few LRM are being stored in dedicated drums (suitable MOC) to minimize the use of drums.  Investa Pumps Pvt.Ltd. Work : Plot No.:762,Phase II,G.I.D.C. Gundlav, Dist. Valsad,Gujara State. Phone:02632-236710.Telefax :236246, E-mail :investa_ad1@sancfharnet.in PUMP MODEL NO. STP-80 MATERIAL OF CONSTRUCTION:- CF8M PARTS LIST PREPARED BY : Bhavesh The unit has been provided with chilled brine based condensers

Sr.No.	Description	Qty Reqd	Material of Construction
20	Flat Gasket	1 No	PTFE
19	Motor Stool	1No	C.I.
18	Flexible Coupling	1No	RRS L-95
17	Coupling Key	1No	SS316
16	Bearing Cover	1No	C.I.
15	Shaft	1No	SS316
14	Hardwares	1 Set	SS316
13	Flange	2No	CF8M
12	Ball Bearing	2No	SKF 6307 ZZ
11	Cup	1No	CF8M
10	Oil Seal	1No	PTFE
09	Mechanical Seal (Stationary Unit)	1No	Ceramic
08	Stationary Unit Gasket	2No	Teflon
07	Mechanical Seal (Rotary Unit)	1No	Carbon
06	Impeller Cage	1No	CF8M
05	Impeller Key	2No	SS316
04	Impeller	1No	CF8M
03	Teflon Rope	1No	CF8M
02	Impeller Cover	1No	CF8M
01	Priming Chamber.	1No	CF8M

Sr. No.	EC Conditions	Compliance Status
(xiv)	Process organic residue and spent carbon, if any, shall be sent to cement other suitable industries for its incinerations. ETP sludge, process inorganic & evaporation salt shall be disposed of to the TSDF.	**Complied.** As per the records furnished during the site visit it was observed that unit has already obtained membership of TSDF site for disposal of hazardous waste and it is disposed through manifest from GPCB. The membership copy and hazardous waste disposal with manifest copy are given below.

BEIL INFRASTRUCTURE LIMITED
(formerly known as Bharuch Enviro Infrastructure Limited)

REF: BEIL/ANK/2021 — 01ST FEBRUARY, 2021

To,
BHARAT RASAYAN LTD.
PLOT NO.42/4,
DAHEJ INDUSTRIAL ESTATE,
GIDC, DAHEJ,
DIST. BHARUCH.

Sub: Membership Certificate for Common Solid Waste Disposal Facility

Dear Sir,

We hereby certify that you have become member of the common Solid/Hazardous Waste Disposal Facility developed by For, BEIL INFRASTRUCTURE LIMITED (Formerly Known as Bharuch Enviro Infrastructure Ltd)., at GIDC, Dahej. You have booked solid waste quantity **7500 MT/ Year** (Original Booked Quantity **6000 MT** + Increased Quantity **1500 MT**). Your Membership No. **is OTH/280.**

Thanking you,

Yours faithfully,
For, BEIL Infrastructure Limited
(Formerly Known as Bharuch Enviro Infrastructure Ltd)

AUTHORISED SIGNATORY

CIN NO. U45300GJ1997PLC032696
Regd. Office : Plot No. 9701-16, GIDC Estate, Post Box No. 82, Ankleshwar 393 002, Dist. : Bharuch (Gujarat)
Phones (02646) 250135, 225228 Fax : (02642) 222849 E-mail : dahejbil@beil.co.in

DETOX GROUP

Saurashtra Enviro Projects Pvt. Ltd.
Integrated Common Hazardous Waste Management Facility

Certificate

Certificate No. : [illegible]

To Whomsoever it may concern

This is to certify that

BHARAT RASAYAN LIMITED

PLOT NO.42/4,
GIDC DAHEJ,
TAL. VAGRA,
BHARUCH

is a valid member of

SAURASHTRA ENVIRO PROJECTS PVT. LTD.

for Integrated Common Hazardous Waste Management Facility.

This membership is valid for a period of

5 Years

Date of issue : *14.02.2018*
Date of expiration : *13.02.2023*
Place of issue : *Surat*

For, Saurashtra Enviro Projects Pvt. Ltd.

Director

SUBJECT TO SURAT JURISDICTION

Corporate Office : Detox House, Opp. Gujarat Samachar Press, Udhna Darwaja, Ring Road, Surat - 395 002. (Guj.)
p. +91 261 2351268, 2346181 T. +91 261 2356069
e. info@detoxgroupindia.com w. www.detoxgroup.in
CIN :- U51109GJ2006PTC047489

Sr. No.	EC Conditions	Compliance Status

AGREEMENT FOR SAFELY DISPOSAL OF HAZARDOUS WASTE

BY AND BETWEEN

This agreement is made at Ankleshwar on 19th February, 2021.

M/s. BHARAT RASAYAN LTD. having it's facility at Plot No: 42/4, Amod Road, GIDC Dahej, Dist- Bharuch, Gujarat, hereinafter referred to as the **"First Party - Waste Generator"**. Which expression shall, unless repugnant to the context or meaning hereof, mean and include its representatives successors in interest, executors, administrators, liquidators and permitted assigns) through its duly authorized signatory of the first part.

And

M/s. 3R ENVIRO INDIA PVT. LTD., (Provide better solutions for disposal of waste) Having its Registered Office at 11,Vashishth vanijya complex, Near Railway Stations, Vidhyanagar , Anand, Gujarat, India Hereinafter referred to as the **"Second Party-Consultant / Intermediatory Service Provider"**. Which expression shall, unless repugnant to the context or meaning hereof, mean and include its representatives' successors in interest, executors, administrators, liquidators and permitted assigns) through its duly authorized signatory of the second part.

And

M/s Shree Cement Limited having its facility at:

1) Bangur Nagar, Post Box No. 33, **Beawar** - 305 901, District - Ajmer, Rajasthan.
2) Village: Ras, Tehsil: Jaitaran, Dist. Pali.

For, Bharat Rasayan Ltd. Authorised Signatory

Second Party FOR, 3R ENVIRO INDIA PVT. LTD. AUTHORIZED SIGNATURE

19.3.Any dispute between the Parties arising out of or related to this that is not resolved shall be settled through arbitration conducted in accordance with the Arbitration and Conciliation Act, 1996 and amended from time to time. The arbitration shall be conducted at Mumbai, India. The arbitration proceedings shall be conducted in English and a record of the proceedings shall be maintained in English. All cost and expenses arising from this such arbitration shall be borne by the parties to such arbitration proceeding equally.

IN WITNESS WHEREOF THE PARTIES HERETO HAVE SIGNED AND SUBSCRIBED THEIR RESPECTIVE HANDS ON THE DAY AND THE YEAR FIRST HEREIN ABOVE WRITTEN

M /s BHARAT RASAYAN LTD. (First Party)	M/s. 3R ENVIRO INDIA PVT. LTD (Second Party)	M/s SHREE CEMENT LIMITED (Third Party)
Bharat Rasayan Ltd.	FOR, 3R ENVIRO INDIA PVT. LTD. AUTHORIZED SIGNATURE	
Authorized Signatory	Authorized Signatory	Authorized Signatory
Mr AJAY KUMAR GUPTA	Mr PRAMOD PATHAK.	Mr. Rajesh Goswami

Bharat Rasayan Ltd. Authorised Signatory

First Party Second Party Third Party

BANAS RESOURCES LLP

101, VIRAJ COMPLEX, NEAR OLD VASNA JAKAT NAKA
SYED - VASNA ROAD, VADODARA - 390 015 GUJARAT, INDIA.
M : +91 9825014769, +91 9979706779, +91 9033024009
Email : banasresources6779@gmail.com

Date: 05.09.2022

To,
M/s Bharat Rasayan Limited,
Plot No:42/4,
GIDC Dahej-392130,
Ta-Vagra, Dis-Bharuch

Sub: Membership Certificate for Receiving pre-processing/Co-processing waste at Banas Resources LLP

Dear Sir,

This is to certify that Banas Resources LLP is agreed to receive the Hazardous waste from M/s Bharat Rasayan Limited at their pre-processing/Co-processing facility located at Plot No.D-2/CH 378 to 380, GIDC -2, Taluka-Vagra, Dis:-Bharuch, Dahej-392130. The category and quantity of the waste are as per under.

Sr.No	Waste Name	Category	Accepted Quantity (MT/Year)
1	Process Waste/Waste Residue Containing pesticides	29.1	2066

We assure you that we work in the most economical way as per legal requirements and environmentally suitable manners.

Thanking You,

For BANAS RESOURCES LLP

Authorized Sign AUTHORISED SIGNATORY

Plant : Plot No D/2/CH 378 To 380, GIDC Dahej II Rd, Samatpor, Next To Lewens Lab Pvt Ltd., Revenue Survey No 237/P, & 238/P, Galenda, Taluka Vagra, Bharuch - 392 130, Gujarat

RSPL Recycling Solutions Pvt. Ltd.

Certificate

Certificate No: CPAW1B0006

To Whomsoever it may concern
This is to certify that
BHARAT RASAYAN LTD

PLOT NO 42/4,
AMOD ROAD,
GIDC, DAHEJ
DAHEJ

is a valid member of
Recycling Solutions Private Limited
for Alternate Fuel Resource Facility.
This membership is valid for a period of
10 Years

Date of issue 22/01/2015
Date of expiration 21/01/2025
Place of issue : Panoli

For, Recycling Solutions Private Limited
Director/Authorised signatory

Waste Information :

SrNo	Type Of Waste	Sign Qty (TPA)	SrNo	Type Of Waste	Sign Qty (TPA)
1	DISTILLATION RESIDUE	380.000	2	PROCESS WASTE	1,100.000
				Total Sign Qty (TPA) :	1,480.000

SUBJECT TO BHARUCH JURISDICTION

Site Address: Plot No. 223, GIDC Estate Panoli, Panoli 394 116 (Dist. Bharuch), Gujarat. Phone : 02646 272028
Registered office: Block 132, 20, Tardeo Road, Hall All, Mumbai 400 034, Maharashtra
Email: rspl@rspl.com
Website: www.rspl.com

Sr. No.	EC Conditions	Compliance Status

Banas Resources LLP [77438]

Manifest No: 1882702 08/11/2022 — Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details			
Sender Name	Bharat Rasayan Ltd.(Old Name:Siris Crop Science Limited) [33612]		
Address	GIDC, DAHEJ,- Taluka :VAG Distict:BHA Pin no:392130		
Contact Details	7046500020 ajay.gupta@bharatgroup.co.in	GPS Coordinates	Lat :21.72565656274181 Long :72.59111452003039
Receiver's Details			
State	Gujarat	Type of Facility	Pre- processing
Facility Details	Banas Resources LLP [77438]		
Contact Details	9979706779 girishbhojak@ymail.com	GPS Coordinates	Lat :21.738327130542135 Long:72.66327168165271
Address	Plot No. D-2/CH 378 to 380, Dahej Industrial Area,Revenue Survey No. 237/P, 238/P Taluka :VAG Distict:BHA Pin no:392130		
Waste Details			
Waste Details	I~29~29.1~Process wastes or residues		
Waste Intended for	Preprocessing	Total Qty	9.265MT — Consistency: Solid
Transporter Details			
Name	SHIV LOGISTIC	Contact Details	9555012731 manesh@banasresources.com
Address	20 Rampark Society, Nr Laxmi Nagar,Ranoli District :Vadodara Taluka :Vadodara		
Vehicle Details			
Vehicle no	GJ16AV9708 (IMEI No :358980100454335)	GPS Enabled	Yes — Type of Vehicle: Truck
Driver name	LUKMAN	Driver Contact No	9327149265
Waste Transportation Details			
Vehicle Depart.	08/11/2022 4:22PM	Number of Drums	40 — Loose Waste: 0.000
Remarks	PROCESS WASTE AND WASTE RESIDUE	No of bags	0

Sender's Declaration :

1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.

BHARAT RASAYAN LTD. Plot No. 42/4, Dahej Industrial Estate, G.I.D.C. Dahej-3920130 Dist. Bharuch Gujarat, India

Name and stamp of sender: Date: 08/11/22 For, BHARAT RASAYAN LTD. Signature: Authorised Signatory

Transporter's Acknowledgement of Receipt of waste
Stamp: Date: 08/11/22 Signature: Lukman

Receiver's Certification of Receipt of Hazardous waste

Stamp: Date: Signature:

BEIL Infrastructure Ltd [40137]

Manifest No: 1897082 22/11/2022 — Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details			
Sender Name	Bharat Rasayan Ltd.(Old Name:Siris Crop Science Limited) [33612]		
Address	GIDC, DAHEJ,- Taluka :VAG Distict:BHA Pin no:392130		
Contact Details	7046500020 ajay.gupta@bharatgroup.co.in	GPS Coordinates	Lat :21.72565656274181 Long :72.59111452003039
Receiver's Details			
State	Gujarat	Type of Facility	Common TSDF
Facility Details	BEIL Infrastructure Ltd [40137]		
Contact Details	9099057365 mistryrg@beil.co.in	GPS Coordinates	Lat :21.7240193450719 Long:72.59621502850457
Address	GIDC , DAHEJ, Taluka :VAG Distict:BHA Pin no:392130		
Waste Details			
Waste Details	I~35~35.3~Chemical sludge from waste water treatment		
Waste Intended for	LandFill	Total Qty	14.980MT — Consistency: Solid
Transporter Details			
Name	SHAKTI TRANSPORT	Contact Details	9924840033 shaktiwaterdahej@gmail.com
Address	AT PO DAHEJ,DIST : BHARUCH - 392130 District :Bharuch Taluka :Vagra		
Vehicle Details			
Vehicle no	GJ19T3451 (IMEI No :358980100405043)	GPS Enabled	Yes — Type of Vehicle: Truck
Driver name	Maniram	Driver Contact No	9919305948
Waste Transportation Details			
Vehicle Depart.	22/11/2022 4:30PM	Number of Drums	0 — Loose Waste: 14.980
Remarks	ETP sludge and MEE Salt	No of bags	0

Sender's Declaration :

1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.

Name and stamp of sender: BHARAT RASAYAN LTD. Plot No. 42/4, Dahej Industrial Estate, G.I.D.C. Dahej-3920130 Date: 22/11/22 For, BHARAT RASAYAN LTD. Signature: Authorised Signatory

Transporter's Acknowledgement of Receipt of waste
Stamp: Shakti Transport Services Date: 22/11/22 Signature:

Receiver's Certification of Receipt of Hazardous waste

Stamp: Date: Signature:

GGEPIL-CHITTORGARH (90319) [90319]

Manifest No: 1804164 08/08/2022 — Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details			
Sender Name	Bharat Rasayan Ltd.(Old Name:Siris Crop Science Limited) [33612]		
Address	GIDC, DAHEJ,- Taluka :VAG Distict:BHA Pin no:392130		
Contact Details	7046500020 ajay.gupta@bharatgroup.co.in	GPS Coordinates	Lat :21.72565656274181 Long :72.59111452003039
Receiver's Details			
State	Rajasthan	Type of Facility	Pre- processing
Facility Details	GGEPIL-CHITTORGARH (90319) [90319]		
Contact Details	7069028751 sushant.shekhar@rspl.com	GPS Coordinates	Lat :24.5532 Long:74.2514
Address	GGEPIL-CHITTORGARH (90319)		
Waste Details			
Waste Details	I~29~29.1~Process wastes or residues		
Waste Intended for	Preprocessing	Total Qty	18.565MT — Consistency: semi solid
Transporter Details			
Name	GREEN GENE ENVIRO PROTECTION AND INFRAST. PVT.LTD.	Contact Details	9601987958 dipakbansari@lutharaindia.in
Address	PLOT NO 236, GIDC ESTATE,PANOLI, ,PANOLI District :Bharuch Taluka :Bharuch		
Vehicle Details			
Vehicle no	RJ02GA6130	GPS Enabled	Yes — Type of Vehicle: Truck
Driver name	BADRI	Driver Contact No	9001241215
Waste Transportation Details			
Vehicle Depart.	08/08/2022 5:50PM	Number of Drums	72 — Loose Waste: 0.000
Remarks	PROCESS WASTE AND WASTE RESIDUE	No of bags	0

Sender's Declaration :

1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.

BHARAT RASAYAN LTD Plot No. 42/4, Dahej Industrial Estate, G.I.D.C. Dahej-3920130 Dist. Bharuch, Gujarat, India

Name and stamp of sender: Date: 08/08/22 For, BHARAT RASAYAN LTD. Signature: Authorised Signatory

Transporter's Acknowledgement of Receipt of waste
Stamp: Date: 08/08/22 Signature:

Receiver's Certification of Receipt of Hazardous waste

Stamp: Date: Signature:

Safe Enviro Private Limited [53681]

Manifest No: 1897269 22/11/2022 — Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details			
Sender Name	Bharat Rasayan Ltd.(Old Name:Siris Crop Science Limited) [33612]		
Address	GIDC, DAHEJ,- Taluka :VAG Distict:BHA Pin no:392130		
Contact Details	7046500020 ajay.gupta@bharatgroup.co.in	GPS Coordinates	Lat :21.72251 Long :72.59427
Receiver's Details			
State	Gujarat	Type of Facility	Common TSDF
Facility Details	Safe Enviro Private Limited [53681]		
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949
Address	965 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150		
Waste Details			
Waste Details	I~35~35.3~Chemical sludge from waste water treatment		
Waste Intended for	LandFill	Total Qty	26.960MT — Consistency: Solid
Transporter Details			
Name	VRAJ Enterprise	Contact Details	9664548545 cmdindia248@gmail.com
Address	Surat,Surat District :Surat Taluka :Surat City		
Vehicle Details			
Vehicle no	GJ10TT3889 (IMEI No :358980100489700)	GPS Enabled	Yes — Type of Vehicle: Truck
Driver name	MISHRI LAL	Driver Contact No	9558143286
Waste Transportation Details			
Vehicle Depart.	22/11/2022 6:35PM	Number of Drums	0 — Loose Waste: 26.960
Remarks	ETP SLUDGE AND MEE SLUDGE	No of bags	0

Sender's Declaration :

1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.

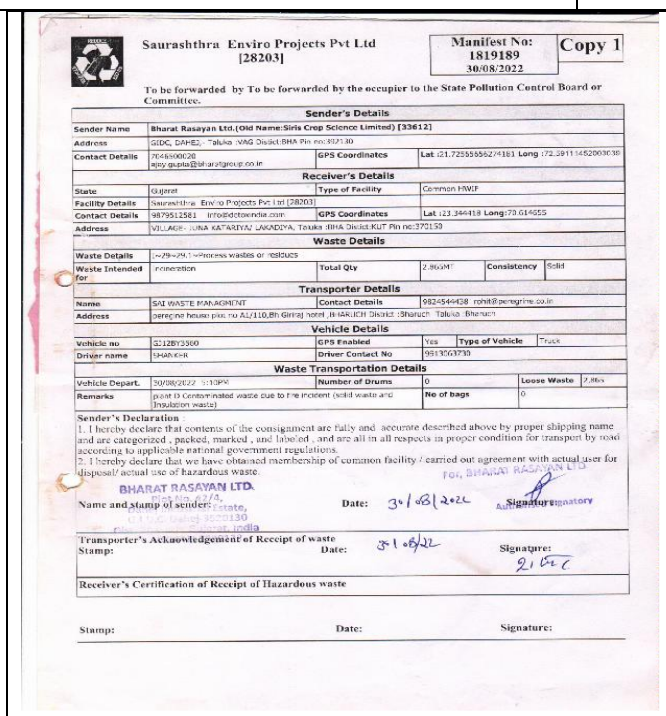
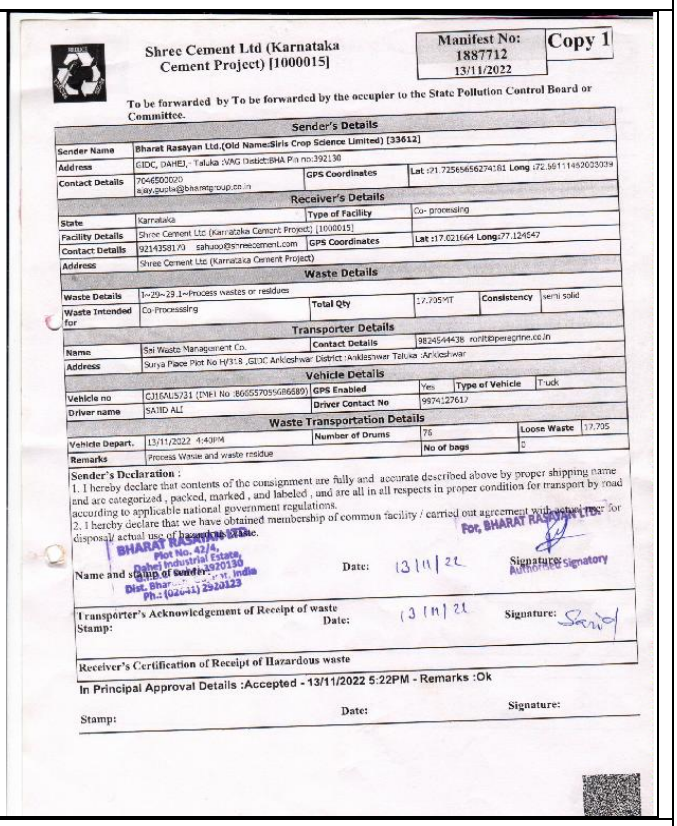
BHARAT RASAYAN LTD. Plot No. 42/4, G.I.D.C Dahej-3920130

Name and stamp of sender: Date: 22/11/22 For, BHARAT RASAYAN LTD. Signature: Authorised Signatory

Transporter's Acknowledgement of Receipt of waste
Stamp: Date: 22/11/22 Signature: MiS

Receiver's Certification of Receipt of Hazardous waste

Stamp: Date: Signature:

Sr. No.	EC Conditions	Compliance Status
	 Saurashthra Enviro Projects Pvt Ltd [28203] Manifest No: 1819189 30/08/2022 Copy 1 To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee. Sender's Details: Sender Name: Bharat Rasayan Ltd.(Old Name:Siris Crop Science Limited) [33612]; Address: GIDC, DAHEJ, - Taluka :VAG District:BHA Pin no:392130; Contact Details: 7046800020 ajay.gupta@bharatgroup.co.in; GPS Coordinates: Lat :21.7255556274181 Long :72.9911145203039 Receiver's Details: State: Gujarat; Type of Facility: Common HWIF; Facility Details: Saurashthra Enviro Projects Pvt Ltd [28203]; Contact Details: 9879511581 info@dctoxindia.com; GPS Coordinates: Lat :23.344418 Long:70.614655; Address: VILLAGE- JUNA KATARIYA/ LAKADIYA, Taluka :BHA District:KUT Pin no:370150 Waste Details: Waste Details: 1~29~29.1~Process wastes or residues; Waste Intended for: incineration; Total Qty: 2.860MT; Consistency: Solid Transporter Details: Name: SAI WASTE MANAGMENT; Contact Details: 9824544438 rohit@peregrine.co.in; Address: peregrine house plot no A1/110,Bh Giriraj hotel ,HANJITH District :Bharuch Taluka :Bharuch Vehicle Details: Vehicle no: GJ12BY3360; GPS Enabled: Yes; Type of Vehicle: Truck; Driver name: SHANKER; Driver Contact No: 9913003730 Waste Transportation Details: Vehicle Depart.: 30/08/2022 5:10PM; Number of Drums: 0; Loose Waste: 2.860; Remarks: point D Contaminated waste due to fire incident (solid waste and Insulation waste); No of bags: 0 Sender's Declaration : 1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations. 2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste. Name and stamp of sender: BHARAT RASAYAN LTD. Plot No. 42/4, GIDC Dahej Industrial Estate, Dahej-392130 Dist. Bharuch (Gujarat) India Date: 30/08/2022 Signature: For, BHARAT RASAYAN LTD. Authorised Signatory Transporter's Acknowledgement of Receipt of waste Stamp: Date: 30/08/22 Signature: Receiver's Certification of Receipt of Hazardous waste Stamp: Date: Signature:	 Shree Cement Ltd (Karnataka Cement Project) [1000015] Manifest No: 1887712 13/11/2022 Copy 1 To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee. Sender's Details: Sender Name: Bharat Rasayan Ltd.(Old Name:Siris Crop Science Limited) [33612]; Address: GIDC, DAHEJ, - Taluka :VAG District:BHA Pin no:392130; Contact Details: 7046800020 ajay.gupta@bharatgroup.co.in; GPS Coordinates: Lat :21.7255656274181 Long :72.9911145203039 Receiver's Details: State: Karnataka; Type of Facility: Co- processing; Facility Details: Shree Cement Ltd (Karnataka Cement Project) [1000015]; Contact Details: 9214358170 sahuo@shreecement.com; GPS Coordinates: Lat :17.621664 Long:77.124547; Address: Shree Cement Ltd (Karnataka Cement Project) Waste Details: Waste Details: 1~29~29.1~Process wastes or residues; Waste Intended for: Co-Processsing; Total Qty: 17.705MT; Consistency: semi solid Transporter Details: Name: Sai Waste Management Co.; Contact Details: 9824544438 rohit@peregrine.co.in; Address: Surya Place Plot No H/318 ,GIDC Ankleshwar District :Ankleshwar Taluka :Ankleshwar Vehicle Details: Vehicle no: GJ16AL5731 (TMI) No :8665570595686889; GPS Enabled: Yes; Type of Vehicle: Truck; Driver name: SAJID ALI; Driver Contact No: 9974127617 Waste Transportation Details: Vehicle Depart.: 13/11/2022 4:40PM; Number of Drums: 76; Loose Waste: 17.705; Remarks: Process Waste and waste residue; No of bags: 0 Sender's Declaration : 1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations. 2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste. Name and stamp of sender: BHARAT RASAYAN LTD. Plot No. 42/4, Dahej Industrial Estate, Dahej-392130 Dist. Bharuch (Gujarat), India Ph.:(02641) 292123 Date: 13/11/22 Signature: For, BHARAT RASAYAN LTD. Authorised Signatory Transporter's Acknowledgement of Receipt of waste Stamp: Date: 13/11/22 Signature: Receiver's Certification of Receipt of Hazardous waste In Principal Approval Details :Accepted - 13/11/2022 5:22PM - Remarks :Ok Stamp: Date: Signature:
(xv)	The company shall undertake waste minimization measures as below (a) Metering and Control of quantities of the 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 in to batch reactors. (e) Venting equipment through vapor recovery system. (f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.	**Complied.** During the site visit it was observed that unit has undertaken following measures to minimize waste generation from the premises: a. Provided magnetic flow meter for charging with metering pumps. b. Vent gases re-use for internal other processes and made valuable products. c. Company use automated material transfer system to minimize spillage in closed loop. d. Provided closed feed system into batch reactors e. The unit has maximized recovery system. f. The unit has provided jet cleaning machine with safety standard to reduce waste water generation with high cleaning performance.
(xvi)	The green belt of at least 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery. Selection of plant species shall be as per the CPCB guidelines	**Complied.** Kindly refer condition no. 4.

Sr. No.	EC Conditions	Compliance Status
	in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map.	The photographs of greenbelt within the premises is given below:

GREEN BELT PHOTOGRAPHS WITHIN BRL

Green Belt near Admin area

Green Belt Near Main Gate

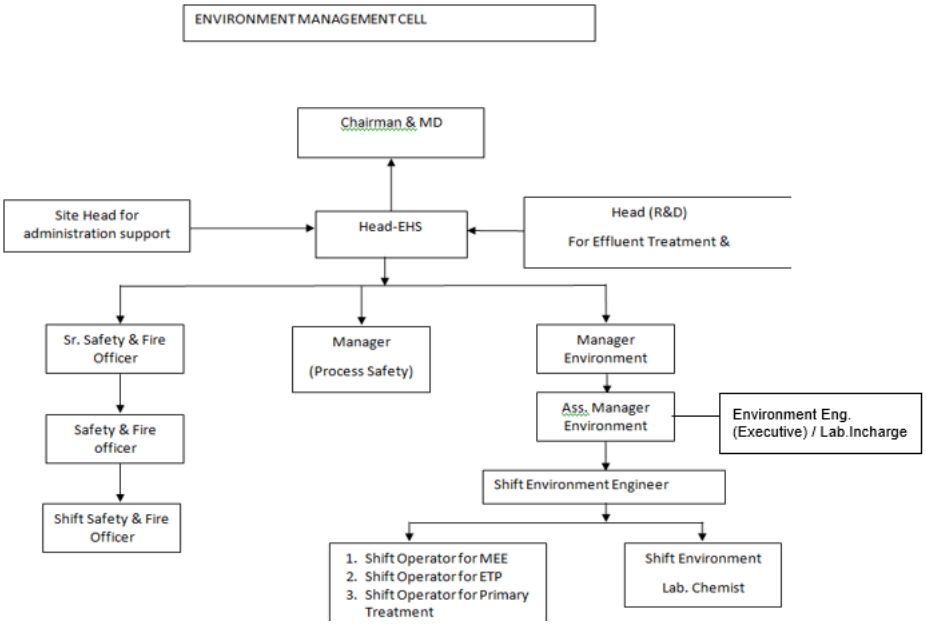
Front View of Green Belt

Green Belt All Around Boundary Wall Near Plant Area

Green Belt Near ETP All Around Boundary Wall

Green Belt near All Around Boundary Wall

Sr. No.	EC Conditions	Compliance Status
(xvii)	A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/ Specialization in the project area) equipped with full- fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	**Complied.** During the site visit it was observed that separate environment management cell has been set up for implementation of environmental safeguards. The EHS head will be responsible for environmental issues at plant. The details and organogram of EMC is given as under



INTRODUCTION

The organization has established and maintains the documented environmental objectives and targets, at ach relevant function and level within the organization. When establishing and reviewing its objectives, organization has considered the environmental policy, legal requirements, and significant environmental aspects. We have also considered our financial and business requirement in views of regulatory and customer's requirements, while framing these objectives and the targets.

These targets has been discussed during the management review meetings and progress rate been evaluated for their effective implementation within the define time frame. 2

EHS COMMITTEE

Contents

Sr. No. : Title

1.0 : Objectives

2.0 : Scope

3.0 : Responsibility

- **Objectives**
- **To contribute to protection of environment by**
  - Improving the environmental management system to enhance the overall environmental performance
  - Comply relevant environmental legislation and regulation
  - Conserve relevant natural resources like fuel, water, energy and promote greening of the environment
- **To promote safety & health of the employees and others associated with our operations by**

Sr. No.	EC Conditions	Compliance Status
	• Implementation of best practices in safety and health management system. • Compliance with the applicable safety and health legislation • **Scope** • The subjected report is applicable for Bharat Rasayan Limited, Plot No. 42/4, GIDC Industrial area, Dahej. Dist. – Bharuch. • The subjected report provides guidelines /directions for • Defining the responsibilities • Defining the detailed instructions and / or references for various activities. • **Responsibility** Organization of the team responsible is illustrated with the help of following team organization chart. • Responsibilities of different functions (team members) indicated in the organization chart are as follows: **<u>Director – Operations:</u>** • To collect data from various team members as described above. • To ensure that all operations are in accordance as specified in objective and scope. • To ensure that adequate financial provision is made in budget of the environmental safe guard. Funds so earmarked shall not be diverted for any other purpose. **<u>Production</u>:** • To ensure that reactors shall be connected with suitable heat exchanger to achieve a recovery of about 95 %. • In process and solvent used in production shall be stored in a separate space with all safety measure. • Proper earthing is be provided in all electrical equipment wherever solvent handling is done. • Entire plant shall be flame proof. The solvent storage tanks shall be provided with flame arrestor was ever applicable. • To ensure that influent process water generated in the process is directed to effluent treatment plant. • To ensure that polybags and drums are decontaminated before reuse /sale /disposal. **<u>Engineering:</u>** • To provide suitable utilities in plant to prevent solvent loss through vaporization. • The water intake shall not exceed 1419 KL/Day. • To provide monitoring arrangements with stacks /vents and proper prevent maintenance to control the air emission. • To ensure building & facilities are provided with suitable drains to avoid mixup of storm water with domestic waste water. • To ensure that waste oil produced is neatly maintained in dedicated containers and sold to authorized recyclers. • To provide suitable arrangements in equipment and ancillary system so as to minimize loss of fuel water and energy. • The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures. **<u>Electrical</u>:** • Proper earthing is being provided in all electrical equipment wherever solvent handling is done. • Entire plant shall be flame proof. • Double earthing provides the all solvent storage tanks and process reactors. • Monitoring and control the DG Set operation (DG sets for power failure/any emergency only) Electrical consumption details are measured and monitoring to control the energy levels and reduce the energy consumption every year.	

Sr. No.	EC Conditions	Compliance Status
	HR & Admin: • To provide manpower for maintaining activities as defined in objective. • To ensure that housekeeping and gardening in factory is well maintained. • Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Gujarat factory rules. • To select the qualified and experienced employees for effective operation to reduce spillage and accidents. • To maintain the competence profile and Department HOD are minimum environment awareness and training will be given to employees for environment protection. **Ware House and Accounts:** • Minimum and maximum stock inventory maintain for continuous operation of Air pollution control equipment and effluent treatment plant for reduce the breakdownhours. • Financial help was providing the hazardous waste disposal and GIDC Intake water and Treated effluent water drain disposal charges and GPCB pending amountsgiven to timely. • Materials are stored as per compatibility to reduce the spillage and incidents. • Training was given to contract and company employees for material handling. **QA & QC** • Materials are stored as per compatibility to reduce the spillage and incidents. • Training was given to contract and company employees for material handling. • MSDS providing for new raw materials and product before use. • Follow the waste water disposal and Hazardous waste disposal. • Decontamination will be carried out before disposal to ETP. **<u>EHS</u>** • Minimum and maximum stock inventory maintain for continuous operation of Air pollution control equipment and effluent treatment plant for reduce the breakdownhours. • Materials are stored as per compatibility to reduce the spillage and incidents. • Training was given to contract and company employees for material handling and equipment's operation. • Training and awareness given to employees for environment protection. • Monitoring and measurement for environment performance. • Timely dispose to Hazardous waste for GPCB authorized party and transporters also. • Improve the environment management system to enhance the overall environmental performance. • Comply relevant environmental legislation and regulation. • Conserve relevant natural and resources like fuel water and energy and promote greening of the environment. • Compliance with the applicable safety and health legislation.	
14.1	**GENERAL CONDITION:**	
(i)	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/ SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA,	**Agreed to comply by the project proponent.** The project proponent has assured that any expansion or modification in the plant likely to cause environmental impacts will be carried out only after obtaining prior environment clearance from the concerned authority.

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td>as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.</td><td></td></tr>
<tr><td>(ii)</td><td>The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.</td><td>Complied.

During the site visit it was observed that for existing plant the unit is already using LED light & project proponent has assured that unit will follow it in expansion also. The photograph of LED light is given below:

 </td></tr>
<tr><td>(iii)</td><td>The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (protection) Act, 1986 Rules, 1989 viz. 75 dB A(day time) and 70 dBA (night time).</td><td>Complied.

During the site visit it was observed that the overall noise level in and around the plant area is being kept well within the standard by providing noise control measures including engineering control like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation.

The noise monitoring was carried out by third party laboratory (M/s. Siddhi Green Env. Consultancy) and data of the same for the compliance period (June-2022 to Nov-2022) are provided below:

<table>
<tr><td colspan="6">Noise level data Sheet June-22 to Nov-22</td></tr>
<tr><td rowspan="2">SR No</td><td rowspan="2">Location</td><td colspan="2">Day Time</td><td colspan="2">Night Time</td></tr>
<tr><td>Min dB(A)</td><td>Max dB(A)</td><td>Min dB(A)</td><td>Max dB(A)</td></tr>
<tr><td>1</td><td>Near Security Main Gate</td><td>61</td><td>66</td><td>54</td><td>61</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>2</td><td>Near ADM office</td><td>57</td><td>59</td><td>49</td><td>54</td></tr>
<tr><td>3</td><td>Near ETP</td><td>71</td><td>74</td><td>62</td><td>69</td></tr>
<tr><td>4</td><td>Near Boiler</td><td>70</td><td>74</td><td>65</td><td>69</td></tr>
<tr><td>5</td><td>Near Plant A</td><td>68</td><td>72</td><td>58</td><td>65</td></tr>
<tr><td>6</td><td>Near Plant B</td><td>68</td><td>73</td><td>60</td><td>67</td></tr>
<tr><td>7</td><td>Near Plant C</td><td>68</td><td>72</td><td>59</td><td>68</td></tr>
<tr><td>8</td><td>Near Utility</td><td>70</td><td>74</td><td>61</td><td>69</td></tr>
<tr><td>9</td><td>Near Canteen</td><td>65</td><td>69</td><td>60</td><td>64</td></tr>
<tr><td>10</td><td>Near MEE Plant</td><td>69</td><td>72</td><td>63</td><td>67</td></tr>
<tr><td colspan="2">Standard</td><td colspan="2">75 dB(A)</td><td colspan="2">70 dB(A)</td></tr>
</table>
Above data infers that average noise level during the daytime and night time was found to be conformed the noise level to the standards under Environment (Protection) Act, 1986.
</td></tr>
<tr><td>(iv)</td><td>The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.</td><td>
Complied.

Kindly refer specific condition no. v.

As per the records furnished during the site visit it was observed that unit has undertaken community welfare measures in the project area for overall improvement of environment. The details for the same is given below:
<table>
<tr><th colspan="3">CSR Activities of Bharat Rasayan Ltd. Dahej in the year 2021-22 & 2022-23</th></tr>
<tr><th>Sr. No</th><th>Activity</th><th>Approx. Rs. in Lacs</th></tr>
<tr><td>1</td><td>Various Activities To Help the Community during Covid-19.</td><td>5</td></tr>
<tr><td>2</td><td>Installed Oxygen Plant at CHC, Gadkhol.</td><td>10</td></tr>
<tr><td>3</td><td>Contributed in the Auspicious Occasion Of"SAMUH LAGNA" Held at Bhutnath Temple.</td><td>1.51</td></tr>
<tr><td>4</td><td>Room Repairing and Terrace IPS of Sadanand Vighyamandir, Amleshwar.</td><td>1.5</td></tr>
<tr><td>5</td><td>Teacher Salary of Shri P.J.Chhada Vighyalaya,Dahej and Sanskar Vidhyalay Dahej.</td><td>3.6 (30,000 every month)</td></tr>
<tr><td>6</td><td>Solar Light installed at Sadanand Vidhya Vihar, Amleshwar Village</td><td>0.84</td></tr>
<tr><td>7</td><td>1 Computer Set provide in Mamlatdar and Executive Mejistrate Kacheri, Vagra.</td><td>0.27</td></tr>
<tr><td>8</td><td>3 Computer Set provide in SP Office Bharuch</td><td>1.33</td></tr>
<tr><td>9</td><td>Distribution of Eco-Friendly Stove at Sadanand Vidhya Vihar, Amleshwar Village</td><td>5.12</td></tr>
</table>
Photographs of welfare activities attached as below:
</td></tr>
</table>

Sr. No.	EC Conditions	Compliance Status

પ્રતિ,
મેનેજરશ્રી
ભારત રસાયણ લીમીટેડ
૪૨/જ આમોદ રોડ, દહેજ જીઆઈડીસી, દહેજ

વડૂચ થી ચરણસિંહ એ રણાના સ્નેહ વંદન..
કુશળ હશો.

વિષયઃ કોવિડ-૧૯ વૈશ્વિક મહામારીના સંજોગોમાં વાગરા વિધાનસભાના જરૂરીયાતમંદ નાગરીકોને સહાય બાબત.

જયભારત સહ જણાવવાનું કે હાલમાં આખાયે વિશ્વમાં કોવિડ-૧૯ વૈશ્વિક મહામારીએ હાહાકાર મચાવ્યો છે. આ મહામારી થી વિશ્વની માનવજાત ઉપર ખુબ જ મોટી આફત આવી પડેલી છે. તેથી અનેક મુશ્કેલીઓનો સામનો કરી રહેલ માનવજાત પીડીત છે. આ સંજોગોમાં સરકારશ્રીએ કોરોના ને કંટ્રોલ કરવાના હેતુ થી સમગ્ર દેશમાં લોકડાઉન કરવાની ફરજ પડી તેના લીધે જીવન જરૂરીયાતની ચીજ વસ્તુઓ માટે પડતી મુશ્કેલીઓને પહોંચી વળવા મારી વાગરા વિધાનસભા મતવિસ્તારના તમામ ગામોના ગરીબ, જરૂરીયાતમંદો સુધી જીવન જરૂરીયાતની રાશન કીટ પહોંચાડવાનો મારી પ્રતિજ્ઞાના નિર્ણયમાં આપનો ડંખની સંસ્થા પ્રત્યક્ષ કે પરોક્ષ રીતે સહભાગી બન્યા છે. એ મારા તથા મારી ૧૫૧-વાગરા વિધાનસભાના નાગરીકો માટે ગર્વની વાત છે આ સત્કાર્યમાં સહભાગી બની માનવસેવા એજ પ્રભુ સેવાનુ સુત્ર સાર્થક કરી બતાવ્યુ છે. તે બદલ મારી વાગરા વિધાનસભાની પ્રજા વતી આપનો હું ઋણી રહીશ.

મારા લાયક કામકાજ જણાવશો.

આપના

ગામ પંચાયત
મુ.પો. દહેજ, તા. વાગરા, જી. ભરૂચ.

DAHEJ
GAM PANCHAYAT
AT. & Po. DAHEJ, TA. VAGRA, DIST. BHARUCH

તા.૨૫-૪-૨૦૨૦

પ્રતિ-શ્રી
મેનેજર સા. બીમારૂ
દહેજ

[illegible]

સરપંચ
ગામ પંચાયત - દહેજ

॥ જય ભૂતનાથ ॥ રજી.નં.-ઈ/૩૪૬૭/ભરૂચ

શ્રી ભૂતનાથ ચેરીટેબલ વેલ્ફેર ટ્રસ્ટ
દહેજ

મુ.પો. દહેજ, તા. વાગરા, જી. ભરૂચ. PAN NO.: AASTS7910H

તારીખ : ૦૨/૦૪/૨૨

TO, MANAGER SIR
BHARAT RASAYAN LTD
DAHEJ.

Sub: Request letter regarding the contribution in the auspicious ocassion of "SAMUH LAGNA".

Dear sir/madam,

As you are aware that the programme of "samuh lagna" (wedding ceremony of numerous couples undER single roof.) is held at bhutnath temple.,dahej)

In this auspicious occasion,we select the couples who are extremely poor in their financial condition.

Our organization named **"BHUTNATH CHARITABLE WELFARE TRUST** REF NO. E3467 BHARUCH)/BHATHUJI YUVAK MANDAL takes or anticipates/demands no money whatsoever from these marrying couples or their family.

By doing this we intend to set example of humanity and service to needy.

you are running your industry in Dahej GIDC and your prestige is unmatched.

we sincerely hope to get your support in this act of unselfishness & campassion.
There will be approx 65nos of couples getting married on this day.

We are hereby enclosing a table containing an approx. idea of what would be required and how much it will cost to sponsor this event.

MARRIAGE DATE : 03.05.2022

Yours faithfully,

bhutnath charitable welfare trust (reg no. E3467 bharuch)/bhathuji yuvak mandal
dahej,ta.vagra pin 392130

॥ જય ભૂતનાથ ॥ રજી.નં.-ઈ/૩૪૬૭/ભરૂચ
PAN NO.: AASTS7910H

શ્રી ભૂતનાથ ચેરીટેબલ વેલ્ફેર ટ્રસ્ટ દહેજ
મુ.પો. દહેજ, તા. વાગરા, જી. ભરૂચ

તારીખ : 25/4/2022

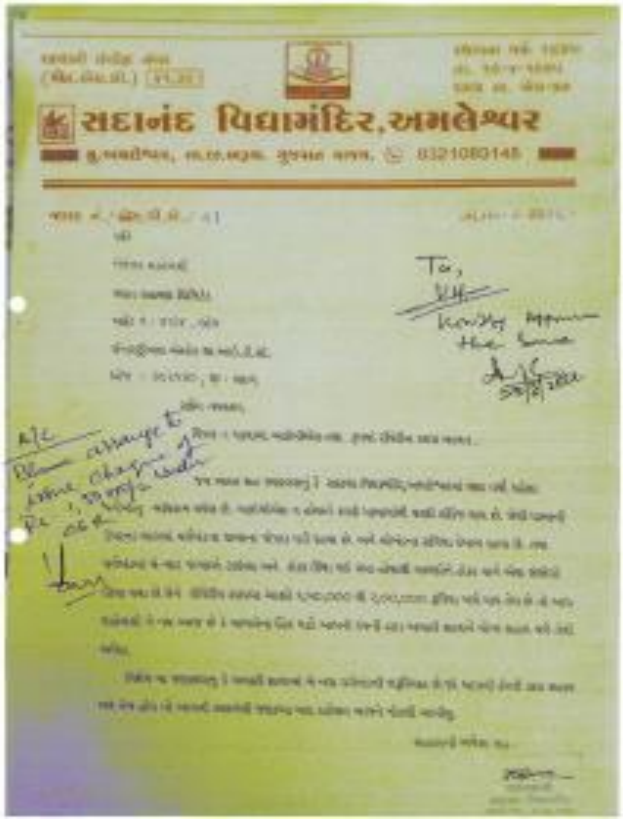
શ્રીમાન Bharat Rasayan limited
ગામ Dahej આપના તરફથી શ્રી ભૂતનાથ ચેરીટેબલ વેલ્ફેર ટ્રસ્ટ દહેજ દ્વારા યોજવેલ સમુહ લગ્નોત્સવમાં દાન પેટે અંકે રૂપિયા One lakh only One thousand only રૂપિયા મળેલ છે જે બદલ ભુપશ્રીનો આભાર.

Cheque - 023597 / 27/04/2022
HDFC Bank

રૂ. 1,01,000/-

સાક્ષી લેનારની સહી

Sr. No.	EC Conditions	Compliance Status



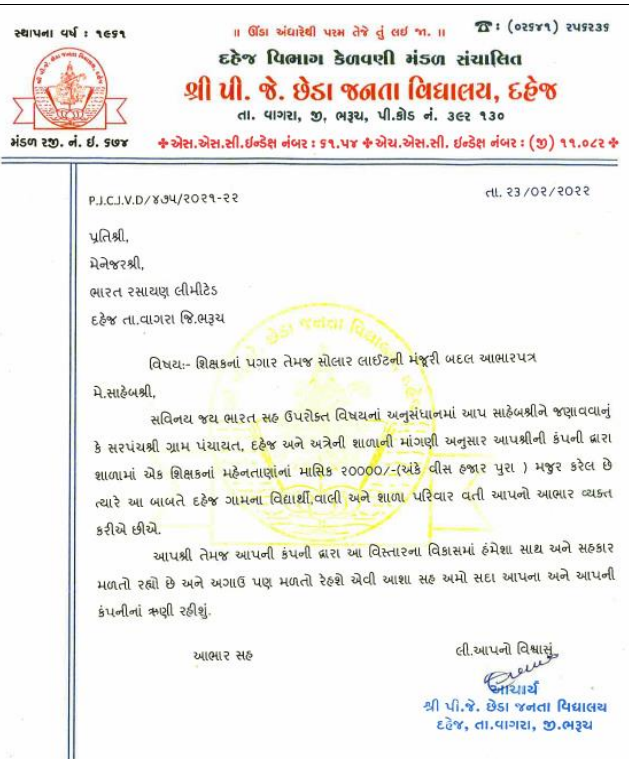
સદાનંદ વિદ્યામંદિર,અમલેશ્વર

મુ.અમલેશ્વર, તા.વાગરા, ભરૂચ. 8321083145

To,

સદાનંદ વિદ્યામંદિર,અમલેશ્વર

મુ.અમલેશ્વર, તા.વાગરા, ભરૂચ. 8321083145



સ્થાપના વર્ષ : ૧૯૬૧

॥ ઊંડા અંધારેથી પરમ તેજે તું લઈ જા. ॥

☎ : (૦૨૬૪૧) ૨૫૬૨૩૯

દહેજ વિભાગ કેળવણી મંડળ સંચાલિત

શ્રી પી. જે. છેડા જનતા વિદ્યાલય, દહેજ

તા. વાગરા, જી. ભરૂચ, પી.કોડ નં. ૩૯૨ ૧૩૦

મંડળ રજી. નં. ઈ. ૬૭૪

✚એસ.એસ.સી.ઇન્ડેક્ષ નંબર : ૬૧.૫૪ ✚એચ.એસ.સી. ઇન્ડેક્ષ નંબર : (જી) ૧૧.૦૮૨ ✚

P.J.C.J.V.D/૪૭૫/૨૦૨૧-૨૨ તા. ૨૩/૦૨/૨૦૨૨

પ્રતિશ્રી,
મેનેજરશ્રી,
ભારત રસાયણ લીમીટેડ
દહેજ તા.વાગરા જિ.ભરૂચ

વિષય:- શિક્ષકનાં પગાર તેમજ સોલાર લાઈટની મંજૂરી બદલ આભારપત્ર

મે.સાહેબશ્રી,

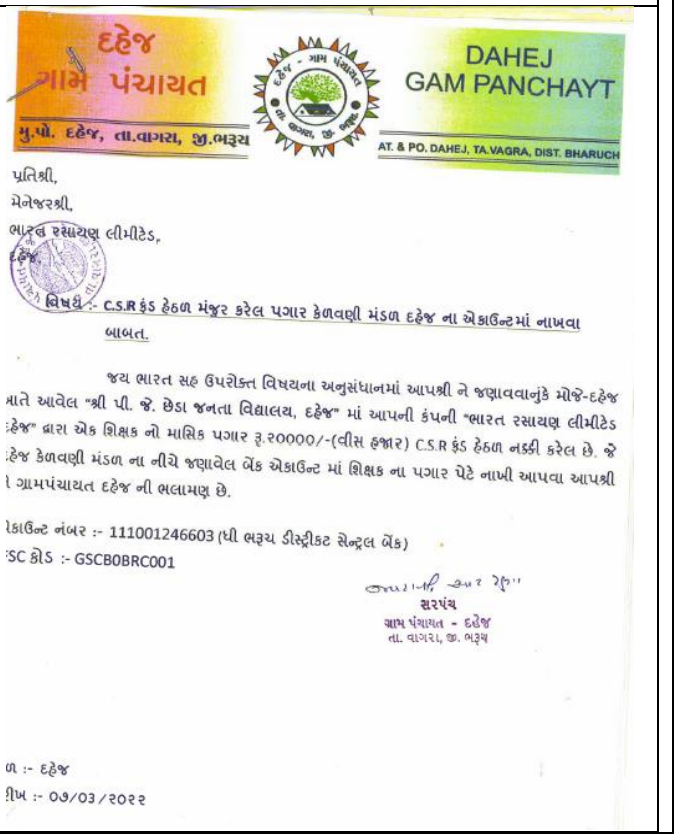
સવિનય જય ભારત સહ ઉપરોક્ત વિષયનાં અનુસંધાનમાં આપ સાહેબશ્રીને જણાવવાનું કે સરપંચશ્રી ગ્રામ પંચાયત, દહેજ અને અત્રેની શાળાની માંગણી અનુસાર આપશ્રીની કંપની દ્વારા શાળામાં એક શિક્ષકનાં મહેનતાણાંનાં માસિક ૨૦૦૦૦/-(અંકે વીસ હજાર પુરા) મજુર કરેલ છે ત્યારે આ બાબતે દહેજ ગામના વિદ્યાર્થી,વાલી અને શાળા પરિવાર વતી આપનો આભાર વ્યક્ત કરીએ છીએ.

આપશ્રી તેમજ આપની કંપની દ્વારા આ વિસ્તારના વિકાસમાં હંમેશા સાથ અને સહકાર મળતો રહ્યો છે અને અગાઉ પણ મળતો રેહશે એવી આશા સહ અમો સદા આપના અને આપની કંપનીનાં ઋણી રહીશું.

આભાર સહ

લી.આપનો વિશ્વાસું

આચાર્ય
શ્રી પી.જે. છેડા જનતા વિદ્યાલય
દહેજ, તા.વાગરા, જી.ભરૂચ



દહેજ ગામ પંચાયત

મુ.પો. દહેજ, તા.વાગરા, જી.ભરૂચ

DAHEJ GAM PANCHAYT

AT. & PO. DAHEJ, TA.VAGRA, DIST. BHARUCH

પ્રતિશ્રી,
મેનેજરશ્રી,
ભારત રસાયણ લીમીટેડ,
દહેજ

વિષય :- C.S.R ફંડ હેઠળ મંજુર કરેલ પગાર કેળવણી મંડળ દહેજ ના એકાઉન્ટમાં નાખવા બાબત.

જય ભારત સહ ઉપરોક્ત વિષયના અનુસંધાનમાં આપશ્રી ને જણાવવાનુંકે મોજે-દહેજ માતે આવેલ "શ્રી પી. જે. છેડા જનતા વિદ્યાલય, દહેજ" માં આપની કંપની "ભારત રસાયણ લીમીટેડ દહેજ" દ્વારા એક શિક્ષક નો માસિક પગાર રૂ.૨૦૦૦૦/-(વીસ હજાર) C.S.R ફંડ હેઠળ નક્કી કરેલ છે. જે દહેજ કેળવણી મંડળ ના નીચે જણાવેલ બેંક એકાઉન્ટ માં શિક્ષક ના પગાર પેટે નાખી આપવા આપશ્રી ને ગ્રામપંચાયત દહેજ ની ભલામણ છે.

એકાઉન્ટ નંબર :- 111001246603 (ધી ભરૂચ ડીસ્ટ્રીકટ સેન્ટ્રલ બેંક)
IFSC કોડ :- GSCB0BRC001

સરપંચ
ગ્રામ પંચાયત - દહેજ
તા. વાગરા, જી. ભરૂચ

સ્થળ :- દહેજ
તારીખ :- ૦૭/૦૩/૨૦૨૨

Sr. No.	EC Conditions	Compliance Status
	મામલતદાર અને એક્ઝિક્યુટીવ મેજીસ્ટ્રેટની કચેરી તા.વાગરા જી.ભરૂચ ફોન/ફેક્સ :૦૨૬૪૧-૨૨૫૨૧૧ ઈ-મેઈલ : mam-vagada@gujarat.gov.in ક્રમાંક:ભુમી/વશી/૮૬૧ તા.૧૩/૦૪/૨૦૨૨ પ્રતિ, મેનેજરશ્રી ભારત રસાયણ લી. મુ.દહેજ તા:વાગરા વિષય : સી.એસ.આર ગ્રાન્ટમાંથી કોમ્પુટર સેટ ફાળવી આપવા બાબત જયભારત સહ ઉપરોક્ત વિષય અન્વયે જણાવવાનું કે, સરકારશ્રીના પ્રવર્તમાન નિયમો મુજબ કંપનીના સી.એસ.આર ફંડ માંથી સ્થાનિક વિકાસના કામો કરવાના થતા હોય છે. જેને અનુલક્ષીને આપશ્રી દ્વારા અત્રેની કચેરીને ૧ (એક) કોમ્પ્યુટર સેટ ફાળવી આપેલ છે. જે ખુબ જ પ્રશંસનીય કાર્ય હોય અત્રેની કચેરી આપની આભારી છે. મામલતદાર વાગરા મામલતદાર-વાગરા.	Intertek Intertek NABL Intertek Bharat RASAYAN LIMITEI WORKS : UNIT-II: Plot No. 42/4, Amod Road, GIDC, Dahej, District-Bharu Gujarat-392130, Ph.: +91-2641-291123, +91-2642-241100 તા. 05-04-2022 પ્રતિ મામલતદાર શ્રી મામલતદાર અને એકઝીક્યુટીવ મેજિસ્ટ્રેટની કચેરી તા. વાગરા, જી.ભરૂચ વિષય : સી.એસ આર ગ્રાન્ટમાથી કમ્પ્યુટર સેટ ફાળવી આપવા બાબત. રેફ : આપના તા. 29/03/2022 ના રોજ ના પત્ર ના અનુસંધાન માં. પ્રતિ મામલતદાર શ્રી જય ભારત સાથે ઉપરોક્ત વિષય અનુસંધાન માં અપશ્રી ને જણાવવાનું કે આપના ધ્વારા તા. 29/03/2022 ના રોજ મામલતદાર કચેરી વાગરા માટે ૧ કમ્પ્યુટર સેટ ફાળવી આપવા બાબતમાં મદદ રૂપ થવા અમોને વિનંતી પત્ર આપવામાં આવેલ. આપ શ્રી ને જણાવતા આનંદ થાય છે કે કંપની મનેજમેંટ ધ્વારા આપની વિનંતી મંજૂર કરવામાં આવેલ છે અને મામલતદાર કચેરી વાગરા માટે ૧ કમ્પ્યુટર સેટ ફાળવી આપવાનું નક્કી કરેલું છે અને જેથી સ્થાનિક લોકો ના કામો ઝડપથી થશે અને સ્થાનિક લોકો ના વિકાસ, પ્રગતિ ના કામોને વેગ મળશે. અને સદર કમ્પ્યુટર સેટ ફાળવણી થવાથી ત્યાર બાદ ની જરૂરી જાળવણી આપશ્રી (મામલતદાર કચેરી)ધ્વારા કરવાની રહેશે જેની નોધ લેશો અને સદર કમ્પ્યુટર સેટ મળેલ છે તે બાબત નો જરૂરી સ્વીકૃતિ પત્ર આપવાનો રહેશે. ભારત રસાયણ લિમિટેડ (Dahej) ઓથોરાઇસ સિગ્નેટોરી મામલતદાર-વાગરા. તા. 13/4/2022 CIN : L24119DL1989PLC036264 Regd. Off. : 1501, Vikram Tower, Rajendra Place, New Delhi - 110008 Ph. : +91-11-43661111 (30 lines) • Fax : +91-11-43661100, 41538600 E-mail : info@bharatgroup.co.in • Website : www.bharatgroup.co.in

Sr. No.	EC Conditions	Compliance Status

<table>
<tr><th>Sr. No.</th><th>EC Conditions</th><th>Compliance Status</th></tr>
<tr><td></td><td> </td><td> </td></tr>
<tr><td>(v)</td><td>The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. the funds so earmarked for environment management/pollution control measures shall not be diverted for any other purpose</td><td>Complied.

As per the records furnished during the site visit it was observed that unit has allocated separate fund of approx. Rs. 16 Crore for environmental pollution control measures and they further agreed that this fund will not be diverted for any other purpose.
<table>
<tr><th>Sr. No.</th><th>Particulars</th><th>Capital Cost for expansion (Rs. In lakh)</th><th>Additional Recurring Cost Per Annum (Rs. In lakh)</th></tr>
<tr><td>1</td><td>Air Pollution Control</td><td>150</td><td>70</td></tr>
<tr><td>2</td><td>Water Pollution Control</td><td>1100</td><td>2200</td></tr>
<tr><td>3</td><td>Noise Pollution Control</td><td>5</td><td>0.1</td></tr>
<tr><td>4</td><td>Env. Monitoring & Management</td><td>150</td><td>20</td></tr>
<tr><td>5</td><td>Occupational Health & Safety</td><td>50</td><td>20</td></tr>
<tr><td>6</td><td>Green Belt enhancement & Maintenance</td><td>50</td><td>10</td></tr>
<tr><td>7</td><td>Solid Waste Management</td><td>95</td><td>400</td></tr>
</table></td></tr>
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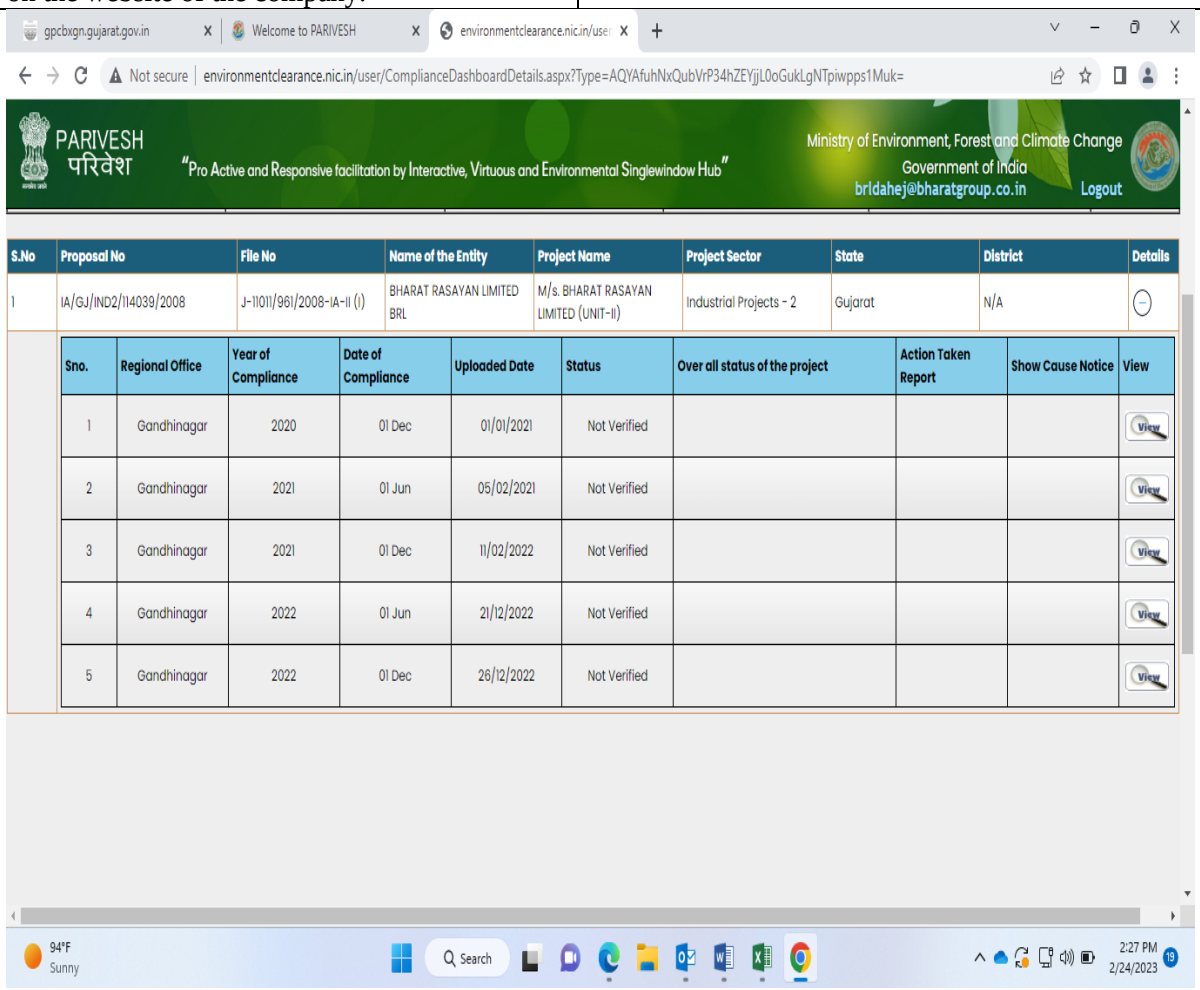
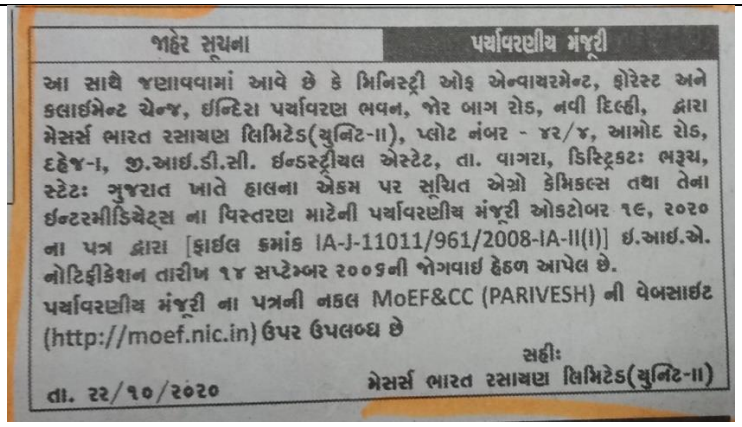
Sr. No.	EC Conditions	Compliance Status
		TOTAL :- 1600 2720.1
(vi)	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.	**Partly Complied.** During the site visit it was informed that unit has submitted copy of the clearance letter to concerned authority and informed the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the GPCB and may also be seen at the website of Ministry/ GPCB. **The unit is directed to submit the copy of acknowledgement letter to this office.**
(vii)	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard as well as by e- mail) to the respective Regional Office of MoEF & CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.	**Complied.** As per the records furnished during the site visit it was observed that half yearly compliance report is successfully submitted to the concerned authority and also uploaded on Parivesh Portal. Screen shot of Parivesh Portal is given below:



S.No	Proposal No	File No	Name of the Entity	Project Name	Project Sector	State	District	Details
1	IA/GJ/IND2/114039/2008	J-11011/961/2008-IA-II (I)	BHARAT RASAYAN LIMITED BRL	M/s. BHARAT RASAYAN LIMITED (UNIT-II)	Industrial Projects - 2	Gujarat	N/A	

Sno.	Regional Office	Year of Compliance	Date of Compliance	Uploaded Date	Status	Over all status of the project	Action Taken Report	Show Cause Notice	View
1	Gandhinagar	2020	01 Dec	01/01/2021	Not Verified				View
2	Gandhinagar	2021	01 Jun	05/02/2021	Not Verified				View
3	Gandhinagar	2021	01 Dec	11/02/2022	Not Verified				View
4	Gandhinagar	2022	01 Jun	21/12/2022	Not Verified				View
5	Gandhinagar	2022	01 Dec	26/12/2022	Not Verified				View

Sr. No.	EC Conditions	Compliance Status
(viii)	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF &CC by e-mail.	**Complied.** As per the records furnished during the site visit it was observed that the environment statement of each financial year ending 31st March in form-v is regularly submitted to the GPCB. The Inward copy of Latest form-v (2021-2022) herewith: Evaluating unlicensed DynamicPDF feature. Click here for details. [4:0:eval] Intertek Bharat RASAYAN LIMITED WORKS : UNIT-II: Plot No. 42/4, Amod Road, GIDC, Dahej, District-Bharuch, Gujarat-392130, Ph.: +91-2641-291123, +91-2642-241100 BRL-Dahej/ DIR/GPCB/2022/33 Date: 03rd Sept., 2022 PCB ID: 33612 To; Unit Head, Bharuch Region Gujarat Pollution Control Board Paryawaran Bhawan, Sector 10A, Gandhinagar Kind. Att.: Shri Irfan Kagzi Sir Subject: Submission of Environment Statement (Form-V) for the period of April 2021 to March 2022 Dear Sir, With reference to above stated subject, herewith we are submitting the Environment Statement as Form-V for the fiscal year of April 2021 to March 2022. We hope, the above is in order as per requirement. Thanking you, Your sincerely, For, Bharat Rasayan Limited. Ajay Gupta Director-operations Post Received Gujarat Pollution Control Board BHARUCH Copy to: Regional Officer, Gujarat Pollution Control Board- Bharuch CIN : L24119DL1989PLC036264 Regd. Off. : 1501, Vikram Tower, Rajendra Place, New Delhi - 110008 Ph. : +91-11-43661111 (30 lines) • Fax : +91-11-43661100, 41538600 E-mail : info@bharatgroup.co.in • Website : www.bharatgroup.co.in
(ix)	The Project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at https;//parivesh.nic.in/. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	**Complied.** As per the records furnished during the site visit it was observed that unit has received the EC letter on 19/10/2020 and advertisement was published in local Newspaper of Gujarat Samachar on dated 22/10/2020 & in Times of India dated 22/10/2020 to inform the public. The copy of advertisement is given below:

Sr. No.	EC Conditions	Compliance Status
		 જાહેર સૂચના — પર્યાવરણીય મંજૂરી આ સાથે જણાવવામાં આવે છે કે મિનિસ્ટ્રી ઓફ એન્વાયરમેન્ટ, ફોરેસ્ટ અને ક્લાઈમેન્ટ ચેન્જ, ઈન્દિરા પર્યાવરણ ભવન, જોર બાગ રોડ, નવી દિલ્હી, દ્વારા મેસર્સ ભારત રસાયણ લિમિટેડ(યુનિટ-II), પ્લોટ નંબર - ૪૨/૪, આમોદ રોડ, દહેજ-I, જી.આઈ.ડી.સી. ઈન્ડસ્ટ્રીયલ એસ્ટેટ, તા. વાગરા, ડિસ્ટ્રિકટઃ ભરૂચ, સ્ટેટઃ ગુજરાત ખાતે હાલના એકમ પર સૂચિત એગ્રો કેમિકલ્સ તથા તેના ઈન્ટરમીડિયેટ્સ ના વિસ્તરણ માટેની પર્યાવરણીય મંજૂરી ઓકટોબર ૧૯, ૨૦૨૦ ના પત્ર દ્વારા [ફાઈલ ક્રમાંક IA-J-11011/961/2008-IA-II(I)] ઈ.આઈ.એ. નોટિફીકેશન તારીખ ૧૪ સપ્ટેમ્બર ૨૦૦૬ની જોગવાઈ હેઠળ આપેલ છે. પર્યાવરણીય મંજૂરી ના પત્રની નકલ MoEF&CC (PARIVESH) ની વેબસાઈટ (http://moef.nic.in) ઉપર ઉપલબ્ધ છે સહીઃ તા. ૨૨/૧૦/૨૦૨૦ — મેસર્સ ભારત રસાયણ લિમિટેડ(યુનિટ-II) PUBLIC NOTICE — ENVIRONMENTAL CLEARANCE It is hereby informed that the Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhavan, Jorbagh Road, New Delhi, has accorded Environmental Clearance for Proposed Expansion in existing premises for Agrochemicals and their Intermediates manufacturing Unit of **M/s. Bharat Rasayan Limited (Unit-II)** at Plot No. 42/4, Amod Road, Dahej-I, GIDC Industrial Estate Taluka: Vagra, Dist: Bharuch, State: Gujarat, vide letter **dated 19/10/2020** [F. No. **IA-J-11011/961/2008-IA-II(I)**] **under the provision of EIA Notification dated 14th September 2006.** Copies of Clearance letter are available on website of MoEF&CC (PARIVESH) - http://moef.nic.in **AUTHORIZED SIGNATORY** **Date:22/10/2020** — **M/s. Bharat Rasayan Limited (Unit-II)**
(x)	The project Authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	**Agreed to comply by the project proponent.** During the site visit it was informed that unit project activities are affected due to corona pandemic. Major equipments, like power supply, Boiler, MEE, ETP etc. under installation/construction, when it will start, the unit will inform Regional Office as well as Ministry.
15.	The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental Clearance, if implementation of any of the above conditions is not found satisfactory.	**Agreed to comply by the project proponent.** The project proponent has assured to comply with any additional condition that may be imposed by the Ministry or any other any other competent authority for the purpose for the environmental protection and management
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	**Noted.**
17.	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if	**Noted.**

Sr. No.	EC Conditions	Compliance Status
	Preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	
18.	The above conditions will be enforced, inter- alia under the provision of the water (prevention and Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981,the Environment (Protection) Act, 1986, the Hazardous waste (Management, Handling and Trans boundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 read with subsequent amendments therein	**Partly Complied.** As per the records furnished during the site visit it was observed that unit has obtained CCA from GPCB for existing production activities under provisions of the Water (Prevention & Control of Pollution) Act,1974, Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and other Wastes (Management and Transboundary Movement) Rules, 2016. Unit has also obtained policy under the Public Liability Insurance Act, 1991 along with their amendments and rules. **The unit is directed to submit the Public Liability Insurance Policy to this office.**

Summary note:

i. Implementation of conditions:

Out of total 45 conditions, it may be seen that 23 are complied, 7 are partly complied, 3 are agreed to comply by the project proponent and 12 conditions are noted by the unit. These have been explained in the foregoing compliance report against each of the conditions, and the PP needs to take necessary and time bound action for early compliance in respect of the relevant conditions. A time targeted action taken report shall be furnished to MoEF&CC, IRO Gandhinagar in this regard within 30 days of receipt of the said letter.

ii. General observations

a. Permanent revocation has not been received from GPCB for closure direction vide letter no. GPCB/BRCH-B/CCA-50(13/)ID-33612/673700 dated 31/05/2022
b. An active case in there with NGT for inspection remarks/observations by CPCB & GPCB joint visit of M/s. Bharat Rasayan Ltd. dated 16/11/2021 in reference to Hon'ble NGT order dated 04/10/2021 in matter OA/60/2021 (WZ) for which final decisions are awaited.
c. The hazardous waste storage area should be strengthened, storage drums must be maintained in good condition and leachate collection facility must be provided.
d. The intermediate storage tanks at all the locations needs a relook for their safety. The pipes should be flameproof and color coding must be done in a time manner.
e. It is advised to renovate the entire ETP. The existing infrastructure of ETP seems inefficient in treating wastewater. It is directed to revamp the area around the nutch filter or advisable to install modern filter technology.
f. General housekeeping must be strengthened near the RO area, VTFD, salt handling area, and MEE.
g. The unit must take strict measures to avoid odour nuisance within the premises.
h. The renovation and maintenance of reactors, pipes, pumps, valves, flanges and other transfer line equipments must be done.
i. There is ample scope to increase the green cover. The unit has adopted many new practices after the incident w.r.t to environmental compliance points and assured to develop the site with the best available technologies following the directions issued by the authorities.

iii. Court cases and show cause/closure notices:

As per the records furnished during the site visit, it was noted that there are 1 court cases is pending with NGT against the project and the unit has received 1 closure notice from GPCB.

(Dr. Yogesh Kumar)
Deputy Director (S)/Scientist- 'C'
IRO Gandhinagar, MoEFCC

डॉ. योगेश कुमार / Dr. Yogesh Kumar
वैज्ञानिक 'सी' / Scientist 'C'
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय,
Ministry of Enviroment, Forest & Climate Change,
भारत सरकार / Govt. of India
ए. क्षे. का., गाँधीनगर (गुजरात) / IRO,Gandhinagar(Gujarat)