

State Environment Impact Assessment Authority, M.P. (Government of India, Ministry of Environment & Forests)

Environmental Planning Coordination Organization (EPCO)
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No: 7307 /SEIAA/2015 Date: 6-11-15

To, Mr. Praful Jain, M/s Krishna Phoschem Ltd., Unit-II, Plot No. 142-143, AKVN Industrial Area, Meghnagar, Jhabua (MP)-457779.

Sub:- Case No. 2030/2014 Environment Clearance for approval of Proposed Manufacturing Unit of Dyes & Intermediates at Plot No. 142-143, Village Meghnagar, District-Jhabua (MP) Plot Area- 24000 sq.m. Production Capacity-110.314 MT/Month (7 products and 1 by-product) by Mr. Praful Jain, M/s Krishna Phoschem Ltd., Unit-II, Plot No. 142-143, AKVN Industrial Area, Meghnagar, Jhabua (MP)-457779.Env Consultant: Ultra-tech Environmental Consultancy & Laboratory.

Ref: Your application dtd. 05.11.2014 received in SEIAA office on 11.11.2014

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

(i) The proposed project is Unit of Dyes & Intermediates at Plot No.- 142- 143, Village-Meghnagar, District-Jhabua (M.P.). The total production capacity including by-product is 110.314 MT/Month. Total 7 products and 1 by-product is presently proposed in this project. Products: 1) Voilet acid – 6400 Kg/Month; 2) E K Acid - 1600 Kg/Month; 3) STA (Sulpho Tobias Acid) - 19994 Kg/Month; 4) H. Acid - 16000 Kg/Month; 5) PNCBOSA - 8385 Kg/Month; 6) Vinyl Sulphone - 51537.5 Kg/Month; 7) 4 Sulpho Anthranilic Acid 3998.4 Kg/Month; By- Products: 8) H. Acid (by production from EK Acid) - 2400 Kg/Month.

(Ajatshatru Shrivastava) Member Secretary

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- (ii) The project is of Synthetic Organic chemical industry (Dyes & Intermediates) covered under 5 (f) category B of the MoEF, GoI, EIA Notification 2006 and its amendments.
- (iii) There is no interstate boundary within 10 km (EE, PWD Jhabua letter dtd.09.07.15) and no National Park / Sanctuary within the 5 km of the project area hence the general conditions are not attracted.
- (iv) The total land area is 24000 sq.m. For which PP has executed lease deed dated 02.02.2015 (registered amended) between Managing Director MPAKVN, (Indore) Ltd. and M/s Krishna Phoschem Ltd., Unit-II, for the period of 30 years (w.e.f. 23.07.10 to 22.07.2040).
- (v) The project is located in notified Meghnagar Industrial Growth Centre District Jhabua approved by MPAKVN (Indore) Ltd. hence as per Gol, MoEF OM dtd 10.12.14 Public hearing is exempted.
- (vi) The total water requirement is 239.6 KLD. Fresh water 73.6KLD + Recycled - 176 KLD for cooling, Boiler & chilling plant). The source of water for the project will be MPAKVN (letter dtd. 05.01.2015)
- (vii) The waste water generated 48.0 KLD from plant is proposed to be treated in ETP (50 KLD) with following components: Holding tank, Stripper, Evaporator, Crystallizer and Incinerator to maintain Zero Liquid Discharge (ZLD) system and 2.4 KLD sewage shall be disposed through septic tank & soak pit.
- (viii) For control of air pollution PP has proposed following measures: -
 - a. DG set will be operated as a power back-up only.
 - b. Stack of adequate height as per CPCB norms will be erected.
 - c. Periodical monitoring will be carried out.
 - d. To control the fugitive emission proponent practices regular maintenance of plant and similar measures will be practiced for proposed project.
- (ix) Hazardous Waste will be generated from Gypsum sludge, Iron Sludge, Sodium Sulphate, E.T.P Sludge Incinerator ash and Discarded Containers etc will be disposed by selling to registered recyclers or common TSDF or Reuse in further process.
- (x) Solid waste generated from the plant are insulation (0.01MT/M), MS Scrap (0.2MT/M), Boiler ash(39 MT/M), canteen waste(0.15MT/M) & other waste (wooden waste, paper & decontaminated plastic etc.) (0.2MT/M) which is proposed to sale to authorized vendor or brick manufacturer/land filling and biodegradable waste will be used for vermiculture.
- (xi) PP has included disaster management plan in the EIA Report.
- (xii) PP has proposed to provide fire fighting system including fire extinguisher fire hydrants, sprinkler system with smoke/fire detectors etc.
- (xiii) PP has proposed greenbelt development in an area of 7920 sq.m (33%) of total area) with suitable plant species within the premises and also proposed 60 trees will be planted in next three years in nearby areas.

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(xiv) As part of CSR activity PP has proposed sanitation facilities at least in two nearby villages near (Amlipathar, Foottalab, Hirapur, Argral, Guzarpada) and health care centre for regularly checkup for villagers. PP shall contact ITI for skill and trade upgradation and provide employment to 25 local people of nearby villages.

Based on the information submitted at Para i to xiii above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 243rd meeting held on 28.09.2015 and decided to accept the recommendations of 214th SEAC meeting held on dtd 20.08.15.

Hence, Prior Environmental Clearance is accorded under the provisions of EIA notification dtd. 14th September 2006 to the proposed Manufacturing Unit of Dyes & Intermediates at Plot No. 142-143, Village Meghnagar, District-Jhabua (MP) Plot Area- 24000 sq.m. Production Capacity-110.314 MT/Month (7 products and 1 byproduct) by Mr. Praful Jain, M/s Krishna Phoschem Ltd., Unit-II, Plot No. 142-143, AKVN Industrial Area, Meghnagar, Jhabua (MP) subject to the compliance of the Standard Conditions enclosed at Annex-I and the following additional Specific Conditions as recommended by SEIAA & SEAC in its meetings.

A. Specific Conditions as recommended by SEIAA

- (1). For raw materials requirement for the project & its storage management:-
 - (a) Ensure to provide fully covered storage facility at the factory site for hazardous and inflammable substances.
 - (b) Ensure the transportation of raw / finished material only by covered vehicles.
 - (c) Ensure the storage and handling of all the chemicals in a proper and safe manner to avoid any spillages and also to prevent runoff contamination in monsoon.
 - (d) Ensure collection & treatment of spillages, if any
 - (e) Ensure availability of MSDS of all the Hazardous materials to the on-site emergency team.
 - (f) All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of hazardous chemicals.
 - (g) All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals. Close handling system for chemicals shall be provided
 - (h) The entire process area should be provided with doubled liner HDEP geo membrane system of thickness 2.5 mm and double leachate collection system for detection of any leachate.
 - (i) The storage area shall be designed in such a way that the floor level is at least 450 mm above the maximum flood level with 2.5 mm thickness of HDPE geo membrane and two layers of RCC in storage as proposed.

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- (2). The entire demand of fresh water should be met from AKVN, supply and there should be no extraction of ground water.
- (3). Waste water:
 - (a) PP should maintain zero discharge from the Industry.
 - (b) Industrial effluent generation shall be completely evaporated with help of Evaporator so as to achieve zero discharge.
 - (c) There shall be no industrial effluent discharge from the unit.
 - (d) Liquid dye mass shall be spray dried by outsourcing and no any saltingdesalting activity shall be carried out at unit.
- (4). The performance of air pollution control system should be regularly monitored and maintained. Regular stack monitoring & ambient air quality monitoring should be carried out as per the guidelines/norms of MPPCB/CPCB.
- (5). Regarding hazardous waste generation, source and disposal PP should ensure:-
 - (a) The storage & management of iron sludge, gypsum sludge, inclinator ash and ETP sludge as proposed.
 - (b) To obtain Authorization from the competent authority (TSDF, Pithampur) for disposal of hazardous wastes.
 - (c) To obtain authorization from MPPCB for collection / treatment / storage / disposal of hazardous wastes.
 - (d) Handling, disposal and management of hazardous waste as per the related prescribed rules.
 - (e) Disposal of hazardous waste regularly through sale or in TSDF site and there should be no dumping of these materials in the premises/outside.
 - (f) Provide RCC layer and double layered HDPE lining for primary and secondary leachate collection.
- (6). Solid waste:
 - (a) PP should Discarded bags/liners/containers shall be either reused or sold to the registered recyclers.
 - (b) Used oil shall be either reused in lubrication of the plant machineries or sold to the registered recyclers
- (7). PP should obtain approval of the Competent Authority for Health and safety, Onsite disaster management plan, Risk management plan before commencing of the project.
- (8). Regarding fire fighting PP should ensure :
 - (a) To obtain approval of the Competent Authority for Firefighting before commencing of the project.
 - (b) To provide fire hydrant water storage with size of 20 m x 10 m x 2 m as proposed.

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- (9). Green belt :-
 - (a) PP should ensure plantation as proposed in 7920 sq. m. completely in first year and it should be as per the CPCB guidelines.
 - (b) Plantation in the project area of indigenous local varieties like Neem, Peepal, Kadam, Kachnaar etc.
 - (c) Every effort should be made to protect the existing trees on the plot.

(10).CSR activities:-

- (a) PP should ensure the implementation of CSR activities on regular basis in consultation with the Gram Panchayat of the receptive village.
- (b) PP should provide employment to at least 30 people from nearby villages.
- (11).In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.
- (12). Total quantity of runoff water generated in non processing unit area and green belt area should be collected in underground tank & used for process in plant to minimize fresh water requirement.
- (13).In case PP is not able to dispose off the waste (Iron sludge, Gypsum and ETP sludge) within one month, the unit will be safely close down and would only restart after the entire waste is lifted from the site.

B. Specific Conditions as recommended by SEAC

- (14). At least eight numbers of Peizo-metric monitoring points should be provided all around the plant premises and their monitoring be done bi-monthly.
- (15). VOC'c detectors should be provided in all storage areas.
- (16). It should be zero discharge unit and no waste water is allowed to discharge outside of the plant premises.
- (17). MEE sludge and other hazardous wastes should be sent to CTSDF, Pithampur, Dhar.
- (18). At least 2.5 cm of first rain water should be passed through the ETP.
- (19). No ground water recharge pits be provided in the plant premises.
- (20). Flammable, ignitable, reactive and non-compatible wastes should be stored
- (21). Separately and never should be stored in the same storage shed.
- (22). Automatic smoke, heat detection system should be provided in the sheds. Adequate fire fighting systems should be provided for the storage area.
- (23). The exhaust of the vehicles used for the purpose of handling, lifting and transportation within the factory such as forklifts or trucks should be fitted with the approved type of spark arrester.
- (24). In order to have appropriate measures to prevent percolation of spills, leaks etc. to the soil and ground water, the storage area should be provided with

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concrete floor of inert material or steel sheet depending on the characteristics of waste handled and the floor must be structurally sound and chemically compatible with wastes.

- (25). Dyke wall should be provided for storage of liquid materials. The dyke wall should be off 2.5 times higher than the quantity of stored materials.
- (26) Measures should be taken to prevent entry of runoff into the storage area. The Storage area shall be designed in such a way that the floor level is at least 150 mm above the maximum flood level.
- (27). The storage area floor should be provided with secondary containment such as proper slopes as well as collection pit so as to collect wash water and the leakages/spills etc.
- (28) Storage areas should be provided with adequate number of spill kits at suitable locations. The spill kits should be provided with compatible sorbent material in adequate quantity.
- (29). Recent MSDS of all the chemicals be displayed at appropriate places.
- (30). APC in the proposed incinerators shall be as per the norms of CPCB.
- (31). CAAQMS and CEMS shall be installed.

(32). All material to be Purchased with quality certificate with analytical report

Standard Conditions - Encl: Annex-I

(Ajatshatru Shrivastava) Member Secretary

Endt No.

SEIAA/ 15

Dated 6:11-10

Copy to:-

- Principal Secretary, Urban Development & Environment Deptt. 3rd Floor, Mantralaya Vallabh Bhawan, Bhopal.
- Secretary, SEAC, Research and Development Wing Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony Bhopal-462016.
- Member Secretary, Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony, Bhopal-462016.
- The Collector, Distt- Jhabua -M.P.
- (5). Managing Director, M.P. Audyogik Kendra Vikas Nigam (Indore) Limited, Free Press House First Floor, 3/54 Press Complex , Agra – Mumbai Highway, Indore(M.P).
- (6). Director, I.A. Division, Monitoring Cell, MoEF, Gol, Ministry of Environment & Forest Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi – 110 003
- Director (S), Regional office of the MOEF, (Western Region), Kendriya Paryavaran Bhawan, Link Road No. 3, Ravi Shankar Nagar, Bhopal-462016.

(8). Guard file.

Encl: Standard Conditions (Annex-I)

(Ajatshatru Shrivastava) Member Secretary

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Research and Development Wing, Madhya Pradesh Pollution Control Board,
Paryavaran Parisar, E-5, Arera Colony, Bhopal-4620 16

Annex-I

Standard Conditions related to item 5 (f) of the schedule of EIA notification, 2006

(Synthetic Organic Chemicals Industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates)

- The company shall install an effluent treatment plant to treat the effluent generated due to proposed activity. The treated water shall be utilized within the premises to achieve zero discharge.
- The hazardous wastes and Incineration from the process and treatment should be disposed off as per Hazardous Wastes (Management & Handling) Rules, 1989 and subsequent amendments.
- The project authority shall obtain the membership of CTSDF (Common Treatment Storage & Disposal Facility) for disposal of solid and hazardous waste (if applicable) and copy of the same shall be submitted to the Regional Office of MoEF, Gol at Bhopal. The company shall maintain the valid membership of CTSDF.
- 4. The process emissions, VOCs and particulate matter form various units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission level shall go beyond the stipulated standards.
- Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by MPPCB.
- The company shall carry out the HAZOP study and the report shall be submitted to Regional Office of MoEF, GoI at Bhopal.
- The company shall comply with the CREP guidelines prepared by MPPCB for Bulk Drug Plants.
- The company shall develop greenbelt in the project area as per the guidelines of CPCB to mitigate the effect of fugitive emission.
- During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixings of accidental spillages with domestic waste and storm drains.

(Dr R P Singh) Officer-in-Charge (Dr Vinita Vipat) Officer-In-Charge (Dr Sadhna Tiwan) Officer-in-Charge 1 of 4

5 (f) Synthetic Organic Chemicals Industry (Guess dye intermediates, bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates

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- Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- 11. The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.
- The DG set will be provided with acoustic arrangements to attenuate the noise pollution. The emission from DG set shall be dispersed as per the CPCB/MPPCB standards.
- 13. Industry should get the Emergency Disaster Management Plan approved by DTHS and should also comply with the provisions made in Public Liability Insurance Act, 1991.
- 14. Any enhancement of capacity, change in technology, modernization and scope of working shall again require prior environmental clearance as per EIA notification, 2006.
- 15. All activities / mitigative measures proposed by PP in Environmental Impact Assessment must be ensured.
- All activities / mitigative measures proposed by PP in Environmental Management Plan and approved by SEAC must be ensured.
- All parameters listed in Environmental Monitoring Plan approved by SEAC must be monitored at approved locations and frequencies.
- Vehicular emissions shall be kept under control and regularly monitored. Vehicles used for transportation of raw material and others shall have valid permissions as prescribed under Central Motor Vehicle Rules, 1989 and its amendments. No overloading of raw material for transportation shall be committed.
- The company shall develop rain water harvesting structures to harvest the run off water for recharge of ground water.
- 20. A separate Environmental Management Cell with suitable qualified personnel shall be set-up under the control of a Senior Executive, who will report directly to the Head of the Organization.
- 21. The funds earmarked for environmental protection measures shall be kept in separate account and shall not be diverted for other purpose. Year wise expenditure shall be reported to the Regional office of the Ministry of Environment and Forest, Bhopal and MP PCB.

Commitment towards CSR have to be followed strictly.

(Dr R P Singh) Officer-In-Charge

(Dr Vinita Vipat) Officer-in-Charge (Dr Sadhna Tiwari) Officer-in-Charge

5 (f) Synthetic Organic Chamicals Industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates.

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- All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained (as and when applicable), by the project proponent from the respective competent authorities.
- The Regional Office, MoEF, Gol, Bhopal and MP PCB shall monitor compliance of the stipulated conditions. A complete set of documents including Environment Impact Assessment Report, Environmental Management Plan, should be given to Regional Office, MoEF, Gol, Bhopal and MP PCB.
- The Project Proponent has to submit half yearly compliance report of the stipulated 25. prior environmental clearance terms and conditions in hard and soft copy to the Regulatory Authority on 1st June and 1st December of each calendar year.
- A copy of the environmental clearance shall be submitted by the Project Proponent to the Heads of the Local Bodies, Panchayat and Municipal Bodies as applicable in addition to the concerned Government Departments / organization responsible for controlling the proposed projects who in turn has to display the same for 30 days from the date of receipt.
- 27. The project proponent has to strictly follow directions/guideline issued by the MoEF, Gol, CPCB and other Govt. agencies from time to time.
- The Project Proponent shall advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at web site of the State Level Environment Impact Assessment Authority (SEIAA) website at www.mpselaa.nic.in and a copy of the same shall be forwarded to the Regional Office, MoEF, Gol, Bhopal and MP PCB.
- The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.
- The SEIAA of M.P. reserves the right to add additional safeguard measures subsequently, if found necessary, and to take action including revoking of the environment clearance under the provisions of the Environmental (Protection) Act, 1986, to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manners

(Dr R'P'Singh) Officer-in-Charge

(Dr Vinita Vipat) Officer-in-Charge

(Dr Sadhna Tiwari)

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Officer-in-Charge

5 (f) Synthetic Organic Chemicals Industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical infermediates

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Research and Development Wing, Madhya Pradesh Pollution Control Board,
Paryavaran Parisar, E-5. Arera Colony, Bhopal-4620 16

- Action plan with respect to suggestion/improvement and recommendations made and agreed during public hearing consultation shall be submitted to the Regional Office, MoEF, Gol, Bhopal, MP PCB within six months.
- These stipulations would be enforced among others under the provisions of Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and control of Pollution) Act 1981, the Environment (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification, 2006.
- The Ministry or any other competent authority may alter/modify the above conditions
 or stipulate any further condition in the interest of environment protection.
- 34. 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.
- Any appeal against this prior environmental clearance shall lie with the Green Tribunal, if necessary, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
- The prior Environmental Clearance granted for the project is valid for a period of five years as per EIA notification dtd. 14.09.2006.
- 37. The proponent shall upload the status of comptlance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM, SO₂, NOx (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
- 38. The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the Regional Office of MoEF.

(Dr R P Singh) Officer-in-Charge (Dr Vinita Vipat) Officer-in-Charge (Dr Sadhna Tiwari) Officer-in-Charge 4 of 4

5 (f) Synthetic Organic Chemicals Industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates.

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