



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

Environmental Planning Coordination Organization
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No: 2535/SEIAA/2023
Date: 13/1/23

To,
Shri Akhilesh Kumawat, India Operation Head,
M/s Baerlocher India Additives Pvt. Ltd,
Plot No. 2 & 2 - C, Industrial Area 2 & 3,
AB Road, Dist. Dewas, MP - 455001

Sub:Case No 9363/2022: Prior Environment Clearance for Expansion of Manufacturing of Metallic Stearates & Intermediate Liquid Metal Soaps at Plot No. 2 & 2 - C, Industrial Area 2 & 3, AB Road, Dist. Dewas, MP by M/s Baerlocher India Additives Pvt. Ltd, Shri Akhilesh Kumawat, India Operation Head, Plot No. 2 & 2 - C, Industrial Area 2 & 3, AB Road, Dist. Dewas, MP - 455001, - Prescribing of TOR.

Ref: - Online Proposal No. SIA/MP/IND3/401258/2022 registered in MPSEIAA on 19.10.2022
This is in reference to the proposal submitted in the SEIAA office to prescribe the Terms of Reference (TOR) for undertaking detailed EIA study for the purpose of obtaining Environmental Clearance in accordance with the provisions of the EIA Notification, 2006. For this purpose, the proponent had submitted online information in the prescribed format (Form-1) along with a Pre-feasibility Report and all supporting documents as per EIA Notification & its amendments.

1. प्रस्तावित परियोजना प्लॉट नंबर 2 और 2 - सी, औद्योगिक क्षेत्र 2 और 3, एबी रोड, जिला देवास, मध्य प्रदेश में Metallic Stearates & Intermediate Liquid Metal Soaps के निर्माण के क्षमता विस्तार 65,500 एमटीपीए से 1,38,700 एमटीपीए के लिए पूर्व पर्यावरण स्वीकृति का है।
2. उक्त प्रकरण को पूर्व में SEIAA प्रकरण क्रमांक 6497 /2019 में पूर्व पर्यावरण स्वीकृति (पत्र क्र. 4111-12/SEIAA/20 दिनांक 20-01-20) उत्पादन क्षमता 20000 MT and 3200 MT Per annum for Metallic Stearates and Intermediate Liquid Metal soaps के लिए तथा solid and liquid stabilizers, की उत्पादन क्षमता 61000 MT - 4500 MT के लिए जारी की गई थी।
3. प्रकरण को राज्य स्तरीय विशेषज्ञ मूल्यांकन समिति की बैठक 611 वीं दिनांक 14.12.2022 में पर्यावरण स्वीकृति हेतु अनुशंसित किया गया, उक्त बैठक की कार्यवाही विवरण पृष्ठ क्र. 36 से 38 तक अंकित है।
4. परियोजना प्रस्तावक द्वारा केवल दो उत्पादों में 65,500 एमटीपीए से 1,38,700 एमटीपीए तक विस्तार का प्रस्तावित किया गया है (Solid Stabilizer from 61,000 MTPA to 1,01,000 (adding 40,000 MTPA) and Liquid Stabilizer from 45,00 MTPA to 14,500 (adding 10,000 MTPA). अन्य उत्पाद यथावत ही रहेंगे।
5. There is no interstate boundary within 05 km and no National Park / Sanctuary within the 5 km of the project area hence the general conditions are not attracted.

The application was forwarded to SEAC for scoping so as to determine TOR to carry out EIA and prepare EMP for the project. The case was presented by the PP and their consultant in the SEAC- 611th meeting dated 14.12.2022. After presentation, committee

decided to recommend standard TOR prescribed by MoEF & CC with additional TOR. After the recommendation of SEAC the case was considered in 764th SEIAA meeting dtd.29.12.2022 and decided to approve the ToR as recommended by SEAC in 611th meeting held on 14.12.22 and standard TOR prescribed by the MoEF & CC for conducting the EIA along with following additional TOR's and general conditions:-

1. PP shall obtained certified compliance report of previous EC conditions from the compitent authority and append the same with EIA report.
2. Efforts made by PP under CER/CSR activities of previous EC shall be discussed in the EIA report with credible proofs.
3. PP should provide entire product mix in the EIA report.
4. A drain is flowing from SE to SW side of the project. Thus its protection plan shall be discussed in the EIA report considering any accidental discharge from the ETP or plant premisis along with storm water management plan.
5. Detailed plant layout on A3 size map with clearly marking the proposed expansion without disturbing the existing green belt area which is left in the previous EC.
6. Carbon emission foot print analysis shall be studied and discussed in EIA report.
7. All process details with mass balance shall be discussed in the EIA report.
8. How project will become "Zero Liquid Discharge" shall be discussed in the EIA report with complete details of treatment scheme, their various details and odour nuisance.
9. Provision for compatible storage of raw materials and finish products shall be studied and discussed in the EIA report.
10. Worst case scenario w.r.t. waste water and hazardous waste should be submitted.
11. Volume of ash generated and its disposal plan till date shall be discussed in the EIA report with credible proofs.
12. Details of solvents and their recovery plan should be discussed in the EIA report. (if any)
13. VOC should be monitored in the AAQ.
14. All MSDS should be provided with the EIA report.
15. Land use plans of the plant both existing land use as well as proposed land use and PP should assure that no existing green area shall be altered for which a written commitment be submitted with the EIA report.
16. PP should explore possibility of using Biofuel based technology in boilers.
17. The EIA report should clearly mention activity wise EMP and CSR cost details and should depict clear breakup of the capital and recurring costs along with the timeline for incurring the capital cost. The basis of allocation of EMP and CSR cost should be detailed in the EIA report to enable the comparison of compliance with the commitment by the monitoring agencies.
18. A time bound action plan should be provided in the EIA report for fulfillment of the EMP commitments mentioned in the EIA report.

The authority approve the ToR as recommended by SEAC and decided to issue additional TOR by incorporating following conditions for preparation of EIA report:

- a) परियोजना प्रस्तावक hazardous मैटेरियल्स के रख रखाव का संबंधित प्राधिकरण के प्रचलित दिशानिर्देशों के अनुसार की जाने वाली व्यवस्था का उल्लेख EIA में करे।
- b) परियोजना प्रस्तावक द्वारा जहां तक संभव हो गैर परंपरागत ऊर्जा स्रोतों के उपयोग हेतु योजना तैयार कर इसे रिपोर्ट में सम्मिलित की जाये ।
- c) परियोजना प्रस्तावक द्वारा ईआईए अध्ययन में वायु गुणवत्ता मॉडलिंग को शामिल किया जाना चाहिए ।
- d) ईकाई से निकलने वाली दुर्गन्ध के शमन के लिये Guidelines on Odour Pollution & Its Control, May 2008, Central Pollution Board, Ministry of Environment Govt. of India के सुझाये उपायों के अनुकूल तथा आधुनिकीकरण व्यवस्था का उल्लेख EIA में करे।
- e) उद्योग से उत्सर्जित Waste Heat का पुर्नउपयोग किस प्रकार करेंगे उसका विवरण दें।

- f) परियोजना अंतर्गत कार्बन फुट प्रिंट को कम करने के लिये गैर पांरपरिक ऊर्जा का उपयोग किया जाने एवं CO₂ उत्सर्जन पर नियंत्रण के उपायों पर भी व्यापक कार्य योजना बनाकर लक्ष्य प्राप्ति हेतु उपायों को रिपोर्ट में सम्मिलित की जाये ।

General Conditions

1. The date and duration of carrying out the baseline data collection and monitoring shall be informed to the concerned Regional Officer of the M.P Pollution Control Board.
2. During monitoring, photographs shall be taken as a proof of the activity with latitude & longitude, date, time & place and same shall be attached with the EIA report. A drone video showing various sensitivities of the lease and nearby area shall also be shown during EIA presentation.
3. An inventory of various features such as sensitive area, fragile areas, mining / industrial areas, habitation, water-bodies, major roads, etc. shall be prepared and furnished with EIA.
4. An inventory of flora & fauna based on actual ground survey shall be presented.
5. Risk factors with their management plan should be discussed in the EIA report.
6. The EIA report should be prepared by the accredited consultant having no conflict of interest with any committee processing the case.
7. The EIA document shall be printed on both sides, as far as possible.
8. All documents should be properly indexed, page numbered.
9. Period/date of data collection should be clearly indicated.
10. The letter /application for EC should quote the SEIAA case No./year and also attach a copy of the letter prescribing the TOR.
11. The copy of the letter received from the SEAC prescribing TOR for the project should be attached as an annexure to the final EIA/EMP report.
12. The final EIA/EMP report submitted to the SEIAA must incorporate all issues mentioned in TOR and that raised in Public Hearing with the generic structure as detailed out in the EIA report.
13. Grant of TOR does not mean grant of EC.
14. The status of accreditation of the EIA consultant with NABET/QCI shall be specifically mentioned. The consultant shall certify that his accreditation is for the sector for which this EIA is prepared. If consultant has engaged other laboratory for carrying out the task of monitoring and analysis of pollutants, a representative from laboratory shall also be present to answer the site specific queries.
15. On the front page of EIA/EMP reports, the name of the consultant/consultancy firm along with their complete details including their accreditation, if any shall be indicated. The consultant while submitting the EIA/EMP report shall give an undertaking to the effect that the prescribed TORs (TOR proposed by the project proponent and additional TOR given by the MOEF & CC) have been complied with and the data submitted is factually correct.
16. While submitting the EIA/EMP reports, the name of the experts associated with involved in the preparation of these reports and the laboratories through which the samples have been got analyzed should be stated in the report. It shall be indicated whether these laboratories are approved under the Environment (Protection) Act, 1986 and also have NABL accreditation.
17. All the necessary NOC's duly verified by the competent authority should be annexed.
18. PP has to submit the copy of earlier Consent condition /EC compliance report, whatever applicable along with EIA report.
19. The EIA report should clearly mention activity wise EMP and CER cost details and should depict clear breakup of the capital and recurring costs along with the timeline for incurring the capital cost. The basis of allocation of EMP and CER cost should be detailed in the EIA report to enable the comparison of compliance with the commitment by the monitoring agencies.

20. A time bound action plan should be provided in the EIA report for fulfillment of the EMP commitments mentioned in the EIA report.
21. The name and number of posts to be engaged by the PP for implementation and monitoring of environmental parameters should be specified in the EIA report.
22. EIA report should be strictly as per the TOR, comply with the generic structure as detailed out in the EIA notification, 2006, baseline data is accurate and concerns raised during the public hearing are adequately addressed.
23. The EIA report should be prepared by the accredited consultant having no conflict of interest with any committee processing the case.
24. Public Hearing has to be carried out as per the provisions of the EIA Notification, 2006. The issues raised in public hearing shall be properly addressed in the EMP and suitable budgetary allocations shall be made in the EMP and CER based on their nature.
25. Actual measurement of top soil shall be carried out in the lease area at minimum 05 locations and additionally N, P, K and Heavy Metals shall be analyzed in all soil samples. Additionally in one soil sample, pesticides shall also be analyzed.
26. PP shall submit biological diversity report stating that there is no adverse impact in-situ and on surrounding area by this project on local flora and fauna's habitat, breeding ground, corridor/ route etc. This report shall be filed annually with six-monthly compliance report.
27. LPG gas shall be provided for camping labour under "Ujjwala Yojna".
28. In the project where ground water is proposed as water source, the project proponent shall apply to the competent authority such as Central Ground Water Authority (CGWA) as the case may be for obtaining, No Objection Certificate (NOC).
29. Under CER scheme commitments with physical targets shall be included in EIA report for:
- ✓ Proposal for CER activities based upon commitment made during public hearing and COVID-19 pandemic.
 - ✓ Activities such as solar panels in school, awareness camps for Oral Hygiene, Diabetes and Blood Pressure, works related to plantation (distribution of fruit & fodder bearing trees) vaccination, cattle's health checkup etc. in concerned village shall be proposed.
 - ✓ No fuel wood shall be used as a source of energy by mine workers. Thus proposal for providing solar cookers / LPG gas cylinders under "Ujjwala Yojna" to them who are residing in the nearby villages, shall be considered.
 - ✓ PP's commitment that activities proposed in the CER scheme will be completed within initial 03 years of the project and in the remaining years shall be maintained shall be submitted with EIA report.
30. Under Plantation Scheme commitments with budgetary allocations shall be included in EIA report for :
- ✓ Comprehensive green belt plan with commitment that entire plantation shall be carried out in the initial three years and will be maintained thereafter with causality replacement. Proposal for distribution of fruit bearing species for nearby villagers shall also be incorporated in the plantation scheme and for which a primary survey for need assessment in concerned village shall be carried out.
 - ✓ Commitment that plantation shall be carried out preferably through Govt. agency (such as Van Vikas Nigam / Van Samiti under monitoring and guidance of Forest Range officer with work permission from DFO concerned / Gram Panchayat / Agricultural department or any other suitable agency having adequate expertise as per the budgetary allocations made in the EMP.
 - ✓ Commitment that high density plantation (preferably using "Miyawaki Technique or WALMI technique) shall be developed in 7.5m barrier zone left for plantation through concern CCF (social forestry) or concerned DFO or any other suitable agency.

- ✓ Commitment that local palatable mixture of annual and perennial grass and fodder tree species shall be planted for grassland/fodder development on degraded forest land suitable for the purpose through Gram Panchayat on suitable community land in the concerned village area and handed over to Gram Panchayat after lease period.
- ✓ PP shall explore the possibility for plantation in adjoining forest land in consultation with concerned DFO and commensurate budget shall be transferred for plantation to DFO.
- ✓ Where ever Aushadhi Vatika (Medicinal Garden) is proposed by PP, minimum 50 saplings be planted considering 80% survival.
- ✓ Adequate provisions of water for irrigating plantation shall be made by PP.

FOR PROJECTS LOCATED IN SCHEDULED (V) TRIBAL AREA , following should be studied and discussed in EIA Report before Public Hearing as per the instruction of SEIAA vide letter No. 1241 dated 30/07/2018.

1. Detailed analysis by a National Institute of repute of all aspects of the health of the residents of the Schedule Tribal block.
2. Detailed analysis of availability and quality of the drinking water resources available in the block.
3. A study by CPCB of the methodology of disposal of industrial waste from the existing industries in the block, whether it is being done in a manner that mitigate all health and environmental risks.
4. The consent of Gram Sabha of the villages in the area where project is proposed shall be obtained.

Documents to be submitted:

Environmental Consultant / PP

- I. A certificate from the Consultant shall be submitted that they have been accredited by MoEF (GoI), as per their OM.
- II. Necessary clearance from the Competent Authority for drawl of requisite quantity of water for the project should be provided.
- III. Location of National Parks, Sanctuaries, biosphere Reserves, Wildlife corridors, Tiger reserves (existing as well as proposed), if any, within 10 km of the mine lease should be clearly indicated. A location map duly authenticated by Chief Wild life Warden and recommendation/ comments of Chief Wildlife Warden of concerned district should also be provided in this regard. DFO letter indicating the distances of nearest forest boundary from the boundary of the proposed site.
- IV. Land documents of the proposed site with clarity of landownership.
- V. NOC from Gram Sabha if located in scheduled notified area.

Validity –

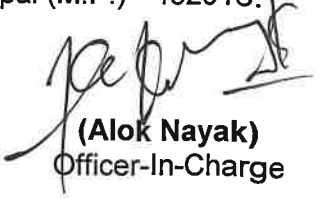
- I. The TORs prescribed for the project will be valid for a period of four years for submission of EIA and EMP report accordingly, the TORs will lapse after 28/12/2026.


(Mujeebur Rehman Khan)
Member Secretary

Copy to:-

1. Member Secretary, SEAC, Research and Development Wing Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony Bhopal-462016.
2. Member Secretary, Madhya Pradesh Pollution Control Board, E-5 Paryavaran Parisar, Arera Colony Bhopal (M.P.) -462016.
3. The Collector, Distt- Dewas - M.P.

4. MPAKVN (Ujjain) Ltd. Nanakheda Bus Stand Campus, Indore Road, Ujjain- 456010- (MP)
5. The Principal Chief Conservator of Forest, Ground floor Satpuda Bhawan, Bhopal (M.P)
6. Regional Officer, Regional Office (WZ), Ministry of Environment & Forests, Kendriya Paryavaran Bhawan, Link Road No.-3, E-5, Arera Colony, Bhopal (M.P.) - 462016.
7. Guard File.


(Alok Nayak)
Officer-In-Charge

