

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

Environmental Planning Coordination Organization (EPCO)
Paryavaran Parisar, E-5. Arera Colony
Bhopal-4620 16

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No: 917 /SEIAA/2015 Date:8.5.15

To, Praful G Patel Partner, N-78, Anoop Nagar, A. B. Road, Indore-(M.P.) 452008

Sub:- Case No. 1832/2014 Prior Environment Clearance for Proposed Trent Chemical Industries at Plot No. 184-A, Meghnagar Industrial Area, Village & Tehsil Meghnagar, District Jhabua, (M.P.) area 26230 sqmt. (2.623 ha) Production Capacity; (1). H-Acid 200 MT/Month (2). PNTOSA 200 MT/Month (3). Gama Acid 25 MT/Month (4). K-Acid 25 MT/Month (5). Metanilic Acid 50 MT/Month (6). DASDA 200 MT/Month and byproducts by M/s Trent Chemical Industries, Partner- Praful G Patel, N-78, Anoop Nagar, A.B. Road, Indore-(M.P.) 452008 Email:trentchemicals@hotmail.com

Ref:- Your application 1649 dtd. Nil received in SEIAA office on 04.10.2014

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), dtd 14.09.06 & its amendment, 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 manufacturing of Synthetic Organic Chemicals (H acid and Intermediates). The production capacity of synthetic organic chemicals are (1). H-Acid 200 MT/Month (2). PNTOSA 200 MT/Month (3). Gama Acid 25 MT/Month (4). K- Acid 25 MT/Month (5). Metanilic Acid 50 MT/Month (6). DASDA 200 MT/Month and byproducts:7) Sodium Sulphate 840 MT/month,8) Gypsum 2986MT/ month, 9) Liquid Sodium Bisulfate 403 MT/month, 10) Dilute Nitric acid/Nitrite Solution195 MT/Month 11) Ammonia Solution 91MT/Month. The project is Synthetic Organic Chemicals industry hence covered under 5 (f) category B of the Schedule of EIA Notification issued by the Ministry of Environment & Forests vice S.O.1533 (E) dtd.14.09.06 & its amendments.
- (ii) The total land area of the project is 26230 sq.m for which lease deed has ben executed (dtd 07.02.2014) for 30 years (w.e.f. 07.02.14 to 06.02.2044) with MP Adyogik Kendriya Vikas Nigam, Indore.
- (iii) There is no National park / Sanctuaries, Eco-sensitive areas, critically polluted areas and inter-State boundaries within 05 km around the proposed site.

(Ajatshatru Shrivastava) Member Secretary

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- (iv) 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.
- (v) The source of water supply is MPAKVN (letter no. 2193 dtd 03.03.15) for 5.0 lac liter per day The total water requirement is 543 KLD (Fresh water 398KLD + Recycled 145 KLD for cooling and gardening). The waste water generation is 268 KLD (Domestic-14 KLD, Process-238 KLD, Boiler 06 KLD Cooling 05KLD & Laboratory 05 KLD). PP has proposed Zero Liquid Discharge (ZLD) system interlock in process with Multiple Effect Evaporation (SMEE) system, effluent storage provision for 100 KLD for emergency and STP for domestic effluent treatment.
- (vi) Hazardous waste generated from process are Gypsum (15816 T/Year), Gypsum Sludge from ZLD (20016 T/Year, ZLD waste sludge (1800 T/Year), Iron sludge Solid waste (9636 T/Year), Glauber Salt (10080 T/Year), Fly ash (720 T/year), Carbon Waste (5.0 T/Year) Used oil (0.50), Discarded Containers / Linters (10000 HDPE bags 1000 nos.drum) etc. PP has submitted MOU letter for purchase / lift the gypsum, fly ash from different companies at Ahemdabad & Meghnagar, Distt Jhauba, MP and copy of letter (dtd 02.04.14) from Ramkey Enterprises Envior Engineers regarding membership of TSDF for disposal of hazardous waste.
- (vii) The air emission shall be NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> & NH<sub>3</sub>. For control of air pollution PP has proposed to provide Emission control systems (scrubbing system, high efficiency dust collector, cyclone separator, solvent recovery in closed loop system, leak detection, repair system) and Periodical Monitoring.
- (viii) For control of firefighting PP has proposed that the plant will be well equipped with suitable numbers of fire fighting and personnel protective equipment.
- (ix) PP has proposed total green belt of 9100 sq.m. (35 % of the total land area) with density of 500 plants per acre. The proposed specie includes Siris, Bamboo, Neem, Pipal, Jamun, Narial, Amla, Piludi, Kerdo, Babul etc.

Based on the information submitted at Para i to ix above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 188<sup>th</sup> meeting held on 18.03.15 and decided to accept the recommendations of 168<sup>th</sup> SEAC meeting held on dtd 11.01.15.

Hence, Prior Environmental Clearance is accorded under the provisions of EIA notification dtd. 14.09.06 & its amendments to the proposed Trent Chemical Industries at Plot No.184-A, Meghnagar Industrial Area, Village & Tehsil Meghnagar, Distt. Jhabua, (MP) area 26230 sqmt. (2.623 ha) Production Capacity;(1).H-Acid 200 MT/Month (2). PNTOSA 200 MT/Month (3). Gama Acid 25 MT/Month (4). K- Acid 25 MT/Month (5). Metanilic Acid 50 MT/Month (6). DASDA 200 MT/Month and byproducts by M/s Trent Chemical Industries, Partner Praful G Patel, N-78, Anoop Nagar, A.B.Road, Indore-(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

- 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.
- PP should ensure Zero Liquid Discharge (ZLD) system interlock in process and maintain zero discharge of effluent.

(Ajatshatru Shrivastava) Member Secretary

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- 3. PP should ensure plantation as proposed in 9100 sq. m. and it should be as per the CPCB guidelines.
- PP should obtain fire NOC from the competent authority.
- 5. PP should ensure disposal of hazardous waste/ by products regularly through sale or in TSDF site and there should be no dumping of these materials in the premises/outside.
- 6. PP should provide RCC layer and double layered HDPE lining for primary and secondary leachate collection.
- 7. PP should obtain NOC /approval from competent authority for health & safety measure, Onsite & Offsite disaster management, Risk management plan and Fire fighting before commencing the operation of the unit.

B. Specific Conditions as recommended by SEAC

- 8. Metanilic acid and DASDA should not be stored for more than 24 hours, if required due precautions should be taken as per the MSDS.
- DASDA transportation should be done with all designed parameters.
- 10. Entire plant (working area) should be made impervious using double liner system / appropriate media.
- 11. Lechate-collection system has to be placed taking into consideration the topography and hydro-geomorphology of the region in consultation with the MPPCB.
- 12. Automated PLC should be provided such that the complete production process stops in case of any failure in the unit.
- 13. Continuous Emission Monitoring system (CEMS) shall be installed in each of the stacks with sensors of expected / relevant pollutants.
- 14. Continuous Ambient Air Monitoring System shall be installed one each in wind-ward and lee-ward directions with sensors of expected / relevant pollutants.
- 15. The monitored data from CEMS and CAAQMS should be made available to MRPCB / CPCB on real time basis.

Standard Conditions - Encl: Annex-I

(Ajatshatru Shrivastava) Member Secretary

Endt No. 918 / SEIAA/ 15 Copy to:-

Dated 8.5.15

(1). Principal Secretary, Urban Development & Environment Deptt. 3rd Floor, Mantralaya Vallabh Bhawan, Bhopal.

(2). Secretary, SEAC, Research and Development Wing Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony Bhopal-462016.

(3). Member Secretary, Madhya Pradesh Pollution Control Board, Paryavaran Parisar, E-5, Arera Colony, Bhopal-462016.

(4). The Collector, Distt- Jhabua-M.P.

(5). M.D. AKVN, Indore No. 3/54, First Floor, Press Complex, Free Press House, Agra - Mumbai Raod, Indore, Madhya Pradesh 452008

(6). M.D. AKVN Industrial Area, Meghnagar Jhabua, M.P.

(7). Director, I.A. Division, Monitoring Cell, MoEF, Gol, Ministry of Environment & Forest Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi - 110 003

(8). Director (S), Regional office of the MOEF, (Western Region), Kendriya Paryavaran Bhawan, Link Road No. 3, Ravi Shankar Nagar, Bhopal-462016.

(9). Guard file.

Encl: Standard Conditions (Annex-I)

(Ajatshatru Shrivastava)

Case No. 1832/2014

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

(Government of India, Ministry of Environment & Forests) 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. waste
- 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.
- 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.
- 5. 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 6. Regional Office of MoEF, Gol 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 Tiwari) Officer-in-Charge

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6 (f) Synthetic Organic Chemicals Industry (Quees 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.
- 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,
- 14. Any enhancement of capacity, change in technology, modernization and scope of working shall again require prior environmental clearance as per EIA notification,
- 15. All activities / mitigative measures proposed by PP in Environmental Impact Assessment must be ensured.
- 16. All activities / mitigative measures proposed by PP in Environmental Management Plan and approved by SEAC must be ensured.
- 17. 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 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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- 23. 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.
- 24. 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.
- 25. The Project Proponent has to submit half yearly compliance report of the stipulated prior environmental clearance terms and conditions in hard and soft copy to the Regulatory Authority on 1<sup>st</sup> June and 1<sup>st</sup> December of each calendar year.
- 26. 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.
- The project proponent has to strictly follow directions/guideline issued by the MoEF, Gol, CPCB and other Govt. agencies from time to time.
- 28. The Project Proponent shall advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at web site of the State Level Environment Impact Assessment Authority (SEIAA) website at www.mpseiaa.nlc.in and a copy of the same shall be forwarded to the Regional Office, MoEF, Gol, Bhopal and MP PCB.
- 29. The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.
- 30. The SEIAA of M.P. reserves the right to add additional safeguard measures subsequently, if found necessary, and to take action including revoking of the environment clearance under the provisions of the Environmental (Protection) Act, 1986, to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manner.

(Dr R'P Singh) Officer-in-Charge (Dr Vinita Vipat) Officer-in-Charge (Dr Sadhna Tiwari) Officer-in-Charge 3 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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- 31. 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 compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM, SO<sub>2</sub>, 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 31<sup>st</sup> 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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