



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

Environmental Planning & Coordination Organization

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To,

Shri RISHABH MEHTA Director,
LIFEFIRST PHARMA PRIVATE LIMITED
M/ to M/3 BCM Heights SCH No. 54
Indore, MP-452010

No.: 4602 /SEIAA/ 26

Date: 29/10/20

Sub:-Case No. 7662/2020 : Prior Environment Clearance for Proposed API Drugs Manufacturing Plant at Plot No. 92, Smart Industrial Park, Pithampur industrial Area, Pithampur, District Dhar MP Total Area: 34245.0 sq.m. Production Capacity : 4200 TPA by LIFEFIRST PHARMA PRIVATE LIMITED through Director, RISHABH MEHTA M/ to M/3 BCM Heights SCH No. 54 Indore, Indore, MP-452010 Email: vivek.shrivastava@lifefirstpharma.com Ph- 4266888 Mob No.-9820675585 Env't. Consultant:- Sms Envocare Limited, Pune, Maharashtra

Ref: Your application dtd. 04.08.20 received in SEIAA office on 14.09.2020

With reference to the 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, ppt. and additional clarifications furnished in response to observations by the State Expert Appraisal Committee (SEAC) and State Environment Impact Assessment Authority (SEIAA) constituted by the competent Authority.

- (i) The project is located over the land which comes under Smart Industrial Park, Pithampur Industrial Area, Pithampur, Dist. Dhar (MP). Geographical coordinate of project is Latitude: 22°34'3.76"N Longitude: 75°35'58.97"E and elevation of the project is 553 meters above sea level.
- (ii) The project is proposed for Manufacturing API Drugs at Plot No. 92, Smart Industrial Park, Pithampur Industrial Area, Pithampur, and Dist. Dhar (MP) by LIFEFIRST PHARMA PRIVATE LIMITED through Director, RISHABH MEHTA
- (iii) M/s. Lifefirst Pharma Pvt. Ltd. has proposed API Drug Manufacturing Plan of 4200 TPA (350 TPM) capacity. Total 57 products have been proposed.
- (iv) There is no interstate boundary (PWD letter dtd. 04.09.2020) within 05 km and no National park, Sanctuary and Eco-sensitive areas (DFO letter dtd. 22.09.2020) within 05 km of the project area hence General condition are not attracted.

- (v) The proposed production capacity is 4200 TPA (350 TPM). Total 57 products have been proposed. Proposed product and production capacity:-

Sr.No.	Product	Quantity (TPA)
1	ALBENDAZOLE	200
2	ALLOPURINOL	200
3	METFORMIN HCl	1000
4	CHLOROTHALIDONE	100
5	TELMISARTAN	100
6	VALSARTAN	100
7	LOSARTAN	200
8	FAMOTIDINE	20
9	SIDENAFIL	50
10	FENOFIBRATE	20
11	PHENYLEFFRINE HCl	20
12	LUMEFANTRINE	100
13	FLUMEQUINE	50
14	PYRANTAL PAMOATE	100
15	BRIMONIDINE TARTRATE	20
16	ETODOLAC	50
17	CIPROFLOXACIN HCl	100
18	PHENOBARBITAL	20
19	MEBANDAZOLE	50
20	FEBENDAZOLE	50
21	HYDROCHLOROTHIAZIDE	50
22	MESALAMINE	100
23	MEFENAMIC ACID	100
24	GLIMEPRIDE	100
25	PENTAPRAZOLE	10
26	MONTELACUST	100
27	OFLOXACIN	10
28	ACYCLOVIR	100
29	SALBUTEMOL SULPHATE	50
30	ATAZANVIR	50
31	ARIPIRAZOLE	100
32	OXCARBAZEPINE	50
33	CELECOXIB	20
34	GLIACLAZIDE	100
35	BROMHEXINE HCl	20
36	CINNARIZINE	20
37	PEROXICAM	10
38	MELOXICAM	10
39	SILODOSIN	50
40	TIMOLOL	10
41	PAROXETINE HCl	10
42	PAC-2(1-tert butyl 2-ethyl 5-oxopyrrolidine-1, 2-dicarboxylate)	50
43	NEBIVOLOL	20
44	LAMOTRIGINE	20
45	NEPAFENAC	10
46	OLANZAPINE	10
47	CLOTRIMAZOLE	10
48	CLOZAPINE	10
49	RUFINAMIDE	10
50	ETHIONAMIDE	10
51	PROTHIONAMIDE	10
52	PREGABALIN	50
53	QUETIAPINE FUMRATE	100
54	DEXTROMETHORPHAN (DMR)	100
55	LEVOCETIRIZINE	50
56	FUROSEMIDE	20
57	IRON SUCROSE	100
TOTAL: 4200 TPA (350 TPM)		

- (vi) The proposed project is covered under 5(f) category "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) as per EIA Notification 2006 and categorized

under B2 Category as per recent MoEFCC So. No. 1223 (E) dated 27th March 2020 & In the context of pandemic COVID -19, MoEF&CC Gol's issued a OM vide dated 13.04.2020, for considering the API & Bulk drug Projects as B-2 category.

- (vii) The case was discussed in SEAC meetings 463rd dated 01.10.2020, and recommended for grant of prior EC.
- (viii) The project is proposed in the company's existing premises having land of 34245.0 sq.m, Regarding land documents PP has submitted allotment letter dtd.15.05.2020 issued by MPIDC (MP Industrial Development Corporation), Bhopal. As per the allotment letter the said land is allotted to LIFEFIRST PHARMA PRIVATE LIMITED through Director, RISHABH MEHTA for setting up a Large industrial unit for manufacturing of Pharmaceuticals. The land will be given for the lease period of 99 years. The land use breakup of the project area is as follows:-

Sr. No.	Building name	Length (M)	Width (M)	Area (M)
1	Total Plot Area	203	181	33442.5
2	Production Block-01	54.8	23.6	1293.3
3	Pilot Plant	20	15	300
4	PP Area (Expansion)	15	15	225
5	Drum Yard	25	10	250
6	Explosive Tank Farm	25	20	500
7	Dining Area	10	10	100
8	RO System Building +ETP	25	15	375
9	Boiler House	20	10	200
10	RO MEE	25	10	250
11	PCC Panel Room	15	5	75
12	DG + Electrical Panel Room	20	10	200
13	RM + PM + FG	50	25	1250
14	Green Area	-	-	11985
15	Road Area	-	-	6307.5
16	Open Area	-	-	4240.2
Total Plant Area				27551.0
Balance Building Expansion Area (in Sq.m)				
Sr. No.	Building name	Length (M)	Width (M)	Area (M)
1	Production Block-01	34.2	25	855
2	Production Block-02	88.2	48.6	4286.5
3	Admin Block	20	15	300
4	Explosive Tank farm	25	10	250
5	Boiler House	20	10	200
Total Plant Area				5891.5

- (ix) The major facilities involved are Boiler, MEE, ATFD, Solvent recovery Plant, Solvent storage area, reactors, Cooling towers, Effluent treatment plant (ETP), and R.O Plant Facilities like administrative office, parking and greenbelt/plantation also developed as per plan/requirement.
- (x) Total water requirement for the project will be 220 kl/day. The water required for the proposed activity will be fulfilled by the MPIDC. PP has submitted letter dtd.27.08.2020 issued by MPIDC (MP Industrial Development Corporation), Indore for water supply.
- (xi) Solid waste generated during the manufacturing process and wastewater treatment process is mainly sludge and will be disposed at authorized TSDF facility, as per

Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2008 (Amendment 2016). M/s. Life First Pharma Pvt. Ltd. has to secure the membership with nearest CHWTSDf for disposal of Hazardous waste generated from the proposed project.

- (xii) Boiler of 6 TPH capacity is proposed which will be Coal+Briquette fired and will have bag filter as APCE and then connected to chimney of 30 m height. The outgoing flue gases quality will be monitored on a regular interval within the prescribed parameters, in-order to meet the CPCB norms.
- (xiii) Power requirement for this project will be 1000 KWH whereas connected load in 1500 KWH. Required power will be source from MP PaschimKshetraVidhyutVitran Co. Ltd. Load sanction application will be submitted. DG set of 1000 KVA has been provided as backup. Diesel will be required for the D.G. set which will be purchased from the nearest petrol pump in drum and transported by road only.
- (xiv) For waste water management P has proposed as follows:-
- LIFEFIRST PHARMA PRIVATE LIMITED. Has proposed 75 KLD ETP & 20 KLD STP separately.
 - ETP will be based on diffused aeration system followed by polishing treatment.
 - High COD/TDS stream will be drained separately to MEE system with pre-treatment for physical treatment.
 - STP will be based on MBBR packaged type separately followed by polishing treatment & disinfection by using UV System. It is planned adjoined ETP area & final treated water storage be common for ETP & STP for further reuse in gardening area.
 - Project will not discharge spent solvent to ETP. Solvent will be recovered separately.
 - Project will not discharge high TDS/COD stream of utilities to proposed ETP
 - Treated single outlet will be as per MPPCB norms for maintaining zero liquid discharge (ZLD) i.e. utilization of treated effluent for gardening / plantation purpose on own land within premises.
- (xv) The main source of air pollution is from boiler, thermic fluid heater and DG Sets for management of air pollution PP has proposed as follows:-
- Bag filter followed by emission stacks shall be provided of 30 m height
 - Stack is also provided with required height of Stack
 - As per the MPPCB directive, emission of Particulate matter shall not exceed the limit of 150 mg/Nm³
 - Regular water sprinkling shall be ensured in the plant area during construction phase.
 - All internal roads shall be paved of concreted as per requirement to avoid the dispersion of Particulate matters.
 - Transportation of Raw material by closed trucks only
 - Regular maintenance of vehicle with PUC shall be maintained.
 - Online stack monitoring system will be provided with due compliance from MPPCB
 - Thick green belt shall be developed in about 35.00 % of total plot area which will help to control the air pollution
- (xvi) Total 12 Nos. of solvents will be used during manufacturing of Respiratory APIs. Out of 12 solvents, 6 solvents consumption is more.

- Solvents will be dispensed to respective reactors using solvent batching system. Reactors are equipped with condensers for condensation of solvents during distillation.
- Dedicated vacuum controller will be provided to maintain desired vacuum during distillation & to improve the recovery of solvent.
- Distilled solvent will be collected in dedicated jacketed distillate receiver, further these distilled solvents will be collected in storage tanks. These recovered solvents will be sent for disposal.
- During processing of API, operation like filtration, layer separation needs to be carried out. In which major solvent consumption is observed.
- In proposed facility, filtration of reaction mass will be carried out in ANFD (Agitated Nutsche Filter Dryer). ANFD will be equipped with dedicated MLR tank and vacuum pump required during drying.
- All mother liquor during filtration operation will be collected in MLR tank and which will further be sent for disposal.
- Vacuum system will be provided with pre and post condenser to condense maximum amount of solvent which evaporates during drying through ANFD.
- These condensers will have utilities like chilled brine which will be provided. Condensed solvent will be collected in jacketed tank.
- Entire condensed solvents will further be sent to disposal.
- Maximum amount of solvents will be recovered at primary & secondary condenser to avoid emission of solvent through vacuum pump.
- Vent of vacuum pump will be further connected to scrubber tank to scrub the uncondensed vapors.
- Solvent recovery will be minimum 95%.
- Solvents from all streams like cleaning, MLR, recovered etc. will further be transferred for disposal through tankers.

(xvii) As per data available with Central Ground Water Authority; average annual rainfall at Dhar district is about 833.61 mm (0.833 m). Following are the storm management plans proposed for the plant

- Separate Drainage will be provided for Effluent and Storm water
- Storm water will be further connected to Storage tank
- This water will be used for green belt and other non-portable domestic purpose
- Drainage provided to Effluent will be connected to ETP
- No kind of waste water will be discharged outside the plant

(xviii) The total plot area is 33442.5 Sq. m and 11985.75 sq. m of land is reserved for development of thick green belt which is about 35.00 % of total plot area. Similarly, considering the requirements of environmental rules and regulations, suitable local plant species will be planted with adequate spacing to maintain or to develop the green zone (buffer zone) in and around the Factory.

- Total 750 Tree species along with ornamental plants will be planted in entire 3 year plantation programs.
- Required nutrients/water/ manure and protection measures shall be provided.
- Ground flora will also be developed in open area. Survival of plant shall also be monitored
- Considering 20% of Mortality rate, provision of 200 additional plants has been kept in planning.

- Avenue plantation/ road side plantation will be done under CER Plan with consultation of local authority, Gram Panchayat . We have identified Madhavpur (Sagore) for avenue plantation
- (xix) PP has included Disaster Management plan in the EMP report. For firefighting measure PP has proposed Hydrant System, Fire Detection and Alarm System, Different types of Fire Extinguishers (CO2 & DCP), Grounding to each production vessels & reactors, Bonding & Jumpers on pipeline, Flame proof electrification, Name and capacities of the chemicals displayed on storage tanks, PPES to be used while handling of chemicals, Spark proof electrification, Portable fire extinguishers of different capacity and types, Flame proof fitting etc.
- (xx) Total cost of proposed unit will be 47.75 Crore.
- (xxi) Lifefirst Pharma Pvt. Ltd. is well aware with the corporate responsibility towards the environment and social development etc. for the Govt. Higher Secondary School, Pithampur Ind. Area, Sambhav NGO Pithampur Mahesh Drishtiheen Kalyan Sangh, Indore, Vasudha Vikash Sansthan, Mandu Road, Dhar In line with above, company has identified total Rs.1.0 Cr towards CER initiatives. Details of the same is given below:

SN	Activity	1 st Yr. (21-22) (In Lakhs)	2 nd Yr. (22-23) (In Lakhs)	3 rd Yr. (23-24) (In Lakhs)	4 th Yr. (24-25) (In Lakhs)	5 th Yr. (25-26) (In Lakhs)	Total (in Lakhs)
Local Infrastructure development							
1	Maintenance of Building of GP Schools Anganwadi centers, Maintenance of Water supply system and Providing RO unit for safe drinking water for GP Office, GP schools and Anganwadises, Providing By-cycle to students etc.	8	8	8	8	8	40
2	Development of New Toilets and maintenance of Existing Toilets of education centres, GP buildings, development of access road, drainage work	8	8	8	8	8	40
3	Providing digital and online study system to GP schools as per requirement	4	4	4	4	4	20
Total		20	20	20	20	20	100.0 (1.0 Crore)

Based on the information submitted at Para i to xvi above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 644th meeting held on 07.10.2020 and decided to accept the recommendations of 463rd SEAC meeting held on dtd. 01.10.20

Hence, Prior Environmental Clearance is accorded under the provisions of EIA notification dtd. 14th September 2006 & its amendments for the Proposed API Drugs Manufacturing Plant at Plot No. 92, Smart Industrial Park, Pithampur industrial Area, Pithampur, District Dhar MP Total Area: 34245.0 sq.m. Production Capacity : 4200 TPA by LIFEFIRST PHARMA PRIVATE LIMITED through Director, RISHABH MEHTA M/ to M/3 BCM Heights SCH No. 54 Indore, Indore, MP-452010, subject to the compliance of the Standard

Conditions and the following additional Specific Conditions as recommended by SEIAA & SEAC in its meetings.

A. Specific Conditions as recommended by SEIAA

1. The entire demand of fresh water should be met through MPIDC.(NOC dtd.27.08.2020) Fresh water should not be used for Irrigation and gardening purpose.

2. Waste water:

- (a) PP should ensure "Zero effluent discharge" from the unit by 100% recycling. The water softening reject, boiler blow down reject and cooling blow down will be treated in ETP. Further treated waste water will go through the RO and finally re used / recycled in the process and unused waste water evaporates in MEE.
- (b) RO and MEE should be provided for treatment of high COD waste streams and only in case of emergency/breakdown high COD wastes should be disposed off through CTSDf, Pithampur, Dhar.

3. For Air Pollution:

- (a) PP should ensure regular Stack monitoring & Ambient air quality monitoring and should be carried out as per the guidelines/norms of MPPCB/CPCB.
- (b) In plant control measures for checking fugitive emission from all the vulnerable sources shall be provided. Fugitive emission shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator/bag filters and water sprinkling system.
- (c) Company shall carry out the HAZOP study and report shall be submitted to ministry MoEF & CC Regional Office, Bhopal.
- (d) PP should explore the possibility to use other source of fuel instead of coal.
- (e) To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal/CNG for use in coal/CNG fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions from the boiler, DG set shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- (f) For control of fugitive emission and VOCs following steps should be followed:-
 - Chilled brine circulation system shall be provided and it should be ensured that the solvent recovery efficiency is not be less than 95%.
 - Reactor and solvent handling pump shall be provided with mechanical seal to prevent leakage.
 - Solvent shall be taken from underground storage tank to reactor through closed pipeline. Storage tank shall be vented through trap receiver and condenser operated on chilled water.

4. Hazardous Waste Management:

- (a) As proposed above, PP should ensure disposal of hazardous waste regularly and there should be no dumping of these materials in the premises/outside.
- (b) PP should ensure handling, disposal and management of hazardous waste as per the related prescribed rules.
- (c) PP should obtain Renewal of authorization regularly from MPPCB for collection storage and disposal of hazardous waste (Management, handling & transboundary Movement) Rules 2008 and its amendments. Membership of the TSDF should be obtain for hazardous waste disposal.
- (d) Hazardous chemicals should be stored in sealed tanks, drums etc. Flame arrestors shall be provided on tanks. To avoid the spillage from processing

unit, Industry shall provide fully mechanized filling and packaging operation unit.

5. Green Belt Development:

- (a) PP should ensure plantation as proposed 11985.75 sq. m of area with 750 number of trees. Plantation in the project area of indigenous local varieties like Neem, Peepal, Kadam and Kachnaar.
 - (b) Every effort should be made to protect the existing trees on the plot.
 - (c) Green area including thick green-belt shall be developed in 35% of the plot area as proposed to mitigate the effect of fugitive emissions all around the plant in consultation with the forest department as per the guidelines of CPCB.
6. PP should ensure the implementation of CER activities to the extent of Rs. 1.0 Crore for the Govt. Higher Secondary School, Pithampur Ind. Area, Sambhav NGO Pithampur Mahesh Drishtiheen Kalyan Sangh, Indore, Vasudha Vikash Sansthan, Mandu Road, Dhar as committed during presentation on regular basis in consultation with Collector, Dhar.
7. Total quantity of runoff water generated and green belt area should be collected in underground tank & used for process in plant to minimize fresh water requirement.
8. All other conditions as laid in the consents of MPPCB shall be applicable.
9. PP should ensure to submit half yearly compliance report and CER activity report with photographs of plantation in MP-SEIAA. If PP is failed to upload or submit two consecutive half yearly compliance reports of EC conditions to concerned authority (SEIAA and Regional Office, MoEF&CC, GoI, Bhopal) than prior environmental clearance issued to PP will automatically be treated as cancelled/ revoked as per OM No. 930/SEIAA/2019 dated 30.05.2019 issued by MPSEIAA.

B. Specific Conditions as recommended by SEAC

(A) Statutory compliance

- i. The project proponent shall obtain Consent to Establish/Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the Madhya Pradesh Pollution Control Board (MPPCB).
- ii. The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.
- iii. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.

(B) Air quality monitoring and preservation

- i. The project proponent shall install 24x7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to MPPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier

specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.

- ii. The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognized under Environment (Protection) Act, 1986.
- iii. The project proponent shall install system to carryout Continuous Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released e.g. PM10 and PM2.5 in reference to PM emission and SO2 and NOx in reference to SO2 and NOx emissions) within and outside the plant area (at least at four locations one within and three outside the plant area at an angle of 120° each) covering upwind and downwind directions.
- iv. To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions from the boiler, DG set shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- v. Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- vi. The DG sets (1 x 1000 kVA) shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.
- vii. National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.
- viii. The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be complied with.

(C) Water quality monitoring and preservation

- i. The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
- ii. As already committed by the project proponent Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises.
- iii. Total 75 KLD ETP should be provided along with Stripper and MEE of 40 KLD capacity to ensure ZLD. Total plant will be based on Zero liquid Discharge Concept (ZLD) and no waste water will be discharged outside the plant. No ground water will be extracted to fulfill the water requirement.
- iv. Adhere to 'Zero Liquid Discharge and No industrial effluent from the unit shall be discharged outside the plant premises. PP should also install Internet Protocol PTZ camera with night vision facility along with minimum 05X zoom and data connectivity must be provided to the MPPCB's server for remote operations.
- v. The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the Madhya Pradesh Control Board while granting Consent under the Air/Water Act, whichever is more stringent.
- vi. Total water requirement for the project will be 220 kl/day. The water required for the proposed activity will be fulfilled by the MPIDC.

- vii. Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
- viii. The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.
- ix. Dedicated power supply shall be ensured for uninterrupted operations of treatment systems.

(D) Noise monitoring and prevention

- i. Acoustic enclosure shall be provided to DG sets (1 x 1000 kVA) for controlling the noise pollution.
- ii. The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation.
- iii. The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.

(E) Energy Conservation measures

- i. The energy sources for lighting purposes shall preferably be LED based.
- ii. Total power requirement for this project will be 1000 KWH whereas connected load in 1500 KWH. The same will be provided from MP PaschimKshetraVidhyutVitrان Co. Ltd. Load sanction application will be submitted. DG set of 1000 KVA has been provided as backup. Diesel will be required for the D.G. set which will be purchased from the nearest petrol pump in drum and transported by road only.

(F) Waste management

- i. Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.
- ii. Hazardous wastes such as spent solvents, organic incinerable wastes/residues, used filter bags, packaging materials, rejected/expired raw materials and off specification/rejected finished products from the manufacturing plants shall be directly sent to CTSDf, Dhar.
- iii. Ash generated from the boiler shall be stored separately and has to be sent to CTSDf, Dhar.
- iv. If any Flammable, ignitable, reactive and non-compatible wastes should be stored separately and never should be stored in the same storage shed.
- v. Automatic smoke, heat detection system should be provided in the sheds. Adequate fire fighting systems should be provided for the storage area.
- vi. In order to have appropriate measures to prevent percolation of spills, leaks etc. to the soil and ground water, the storage area should be provided with concrete floor of inert material or steel sheet depending on the characteristics of waste handled and the floor must be structurally sound and chemically compatible with wastes.
- vii. 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.

- viii. 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.
- ix. 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.
- x. Recent MSDS of all the chemicals used in the plant be displayed at appropriate places.
- xi. Proper fire fighting arrangements in consultation with the fire department should be provided against fire incident.
- xii. All the storage tanks of raw materials/products shall be fitted with appropriate controls to avoid any spillage / leakage. Bund/dyke walls of suitable height shall be provided to the storage tanks. Closed handling system of chemicals shall be provided.
- xiii. Log-books shall be maintained for disposal of all types hazardous wastes and shall be submitted with the compliance report.
- xiv. Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.
- xv. The company shall undertake waste minimization measures as below:
 - (a) Metering and control of quantities of active ingredients to minimize waste.
 - (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
 - (c) Use of automated filling to minimize spillage.
 - (d) Use of Close Feed system into batch reactors.
 - (e) Venting equipment through vapour recovery system.
 - (f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.

(G) Green Belt

- i. The total plot area is 33442.5 Sq. m and 11985.75 sq. m of land is reserve for development of thick green belt which is about 35.00 % of total plot area. Total 750 Tree species along with ornamental plants shall be planted. Required nutrients/water/manure and protection mess shall be provided. Selection of plant species shall be as per the CPCB guide lines in consultation with the State Forest Department.
- ii. Peripheral plantation all around the project boundary shall be carried out using tall saplings of minimum 2 meters height of species which are fast growing with thick canopy cover preferably of perennial green nature. As proposed in the EMP750 no's trees in three years shall be planted. PP will also make necessary arrangements for the causality replacement and maintenance of the plants.

(H) Safety, Public hearing and Human health issues

- i. Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- ii. The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- iii. The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
- iv. Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations

for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.

- v. Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.
- vi. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- vii. There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.

(I) Corporate Environment Responsibility

- i. The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No. 22-65/2017-IA.III dated 1st May 2018, as applicable, regarding Corporate Environment Responsibility.
- ii. The company shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/ forest/ wildlife norms/ conditions. The company shall have defined system of reporting infringements / deviation / violation of the environmental / forest / wildlife norms / conditions and or shareholders /stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.
- iii. A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly to the head of the organization.
- iv. Fund should be exclusively earmarked for the implementation of EMP through a separate bank account.
- v. The estimated capital and recurring cost of Environmental Management Plan for is 200.00 Lakhs and 88.0 lakh/year respectively.
- vi. Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.
- vii. Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

(J) Miscellaneous

- i. PP shall be responsible for discrepancy (if any) in the submissions made by the PP to SEAC & SEIAA.
- ii. The project authorities must strictly adhere to the stipulations made by the MP Pollution Control Board and the State Government.
- iii. The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.

- iv. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).
- v. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India/ High Courts and any other Court of Law relating to the subject matter.

Standard Conditions:

1. The company shall carry out the HAZOP study and the report shall be submitted to Regional Office of MoEF, GoI at Bhopal.
2. The company shall comply with the CREP guidelines prepared by MPPCB for Bulk Drug Plants.
3. During transfer of materials, spillages shall be avoided and gulland drains be constructed to avoid mixings of accidental spillages with domestic waste and storm drains.
4. Industry should get the Emergency Disaster Management Plan approved by DTHS and should also comply with the provisions made in Public Liability Insurance Act, 1991.
5. All parameters listed in Environmental Monitoring Plan approved by SEAC must be monitored at approved locations and frequencies.
6. The funds earmarked for environmental protection measures shall be kept in separate account and shall not be diverted for other purpose. Year wise expenditure shall be reported to the Regional office of the Ministry of Environment and Forest, Bhopal and MP PCB.
7. All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained (as and when applicable), by the project proponent from the respective competent authorities.
8. The Regional Office, MoEF, GoI, 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, GoI, Bhopal and MP PCB.
9. A copy of the environmental clearance shall be submitted by the Project Proponent to the Heads of the Local Bodies, Panchayat and Municipal Bodies as applicable in addition to the concerned Government Departments / organization responsible for controlling the proposed projects who in turn has to display the same for 30 days from the date of receipt.

10. The project proponent has to strictly follow directions/guideline issued by the MoEF, Gol, CPCB and other Govt. agencies from time to time.
11. The Project Proponent shall advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at web site of the State Level Environment Impact Assessment Authority (SEIAA) website at www.mpseiaa.nic.in and a copy of the same shall be forwarded to the Regional Office, MoEF, Gol, Bhopal and MP PCB.
12. Any change in the correspondence address be duly intimated to all the regulatory authority within 30 days of such change.
13. The Project Proponent has to upload soft copy of half yearly compliance report of the stipulated prior environmental clearance terms and conditions on 1st June and 1st December of each calendar year on MoEF & CC web portal - <http://www.environmentclearance.nic.in/> or <http://www.efclearance.nic.in/> and submit hard copy of compliance report of the stipulated prior environmental clearance terms and conditions to the Regulatory Authority also
14. 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.
15. 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.
16. The Ministry or any other competent authority may alter/modify the above conditions or stipulate any further condition in the interest of environment protection.
17. 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.
18. 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.
19. The prior Environmental Clearance granted for the project is valid for a period of seven years as per EIA notification dtd. 14.09.2006 & its amendments.
20. The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM, SO₂, NO_x (ambient levels as well as stack emissions) or critical sectoral

parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.

21. 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.

4608

(Tanvi Sundriyal)
Member Secretary

Endt No. / SEIAA/ 2020
Copy to:-

Dated 29.10.2020

- (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, District Dhar, M.P.
- (5). Managing Director, M.P. Audyogik Kendra Vikas Nigam (Indore) Limited, Free Press House First Floor, 3/54 Press Complex, Agra-Mumbai Highway Indore (M.P).
- (6). Director, I.A. Division, Monitoring Cell, MoEF, Gol, Ministry of Environment & Forest Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi - 110 003
- (7). Director (S), Regional office of the MOEF, (Western Region), Kendriya Paryavaran Bhawan, Link Road No. 3, Ravi Shankar Nagar, Bhopal-462016.
- (8). Guard file.

(Dr. Sanjeev Sachdev)
Officer-in-Charge