

Date: November 14, 2019

To,
Deputy Director General of Forest (Central)
Regional Office (Western Region),
Ministry of Environment and Forests,
"Kendriya Paryavaran Bhavan"
Link Road no.3E-5, Ravi Shankar Nagar
Bhopal – 462 016 (M.P.)

Sub: Submission of Comprehensive EC Compliance report with reply to the additional observations and present status with adequate reasoning and supporting data.

Ref.: MoEF&CC Letter No. 5-4/2016(ENV)/778, Dated: 14.10.2019
EC No.: J-11011/481/2011-IA II (I) dated: 25.06.2016

Dear Sir,

We are in receipt of above referred letter and noted the contents of the letter, we would like to state as under along with the required details as attachments in compliance of the points mentioned in the letter.

- i. Present status (Physical/civil) of work progress.
Our Reply: Presently the project is under operation as per awarded Environmental Clearance from MoEF and CCA from GPCB.
- ii. A comprehensive compliance report in respect of all the conditions of EC with adequate reasoning and supporting data showing the summary of the monitored data in tabular format within the compliance status itself.
Our Reply: A comprehensive compliance report in respect of all the conditions of EC with the summary of the monitored data in a tabular format as attachment –I.
- iii. Period of Compliance for which compliance report is being submitted.
Our Reply: We are regularly submitting EC compliance report for the period of:
The Acknowledge copy of same is enclosed as EC Comp. Condition no.15.
 1. (April'17 to Sept'17) Date: 29.11.2017.
 2. (Octo'17 to March'18) Date: 25.05.2018
 3. (April'18 to Sept'18) Date: 26.12.2018.
 4. (Octo'18 to March'19) Date: 22.05.2019.

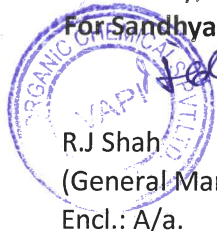
Handwritten signature


- iv. Copies of
- EIA/EMP/Form-I.
 - **Our Reply:** The soft Copy of EIA/EMP/Form-I in CD is enclosed as attachment - II.
 - Recommendations of the Public Hearing, if any.
 - **Our Reply:** Public hearing was exempted as per section 7(i)(III) stage (3) Para (i)(b) of the Environment Impact Assessment Notification-2006.
 - Consent to Establish/Operate from GPCB
 - **Our Reply:** Copy of Consent to Establish and Consent to operate is enclosed as EC Compliance Annexure - IX.
- v. Details of show cause/closure notice issued by GPCB/CPCB during last 3 years.
Our Reply: The last 3 years show cause notice issued by GPCB in tabular form is enclosed as EC Compliance Annexure - XII.
- vi. Details of court cases.
Our Reply: There is no court case against our company.
- vii. Information about any expansion/replacement/construction work undertaken without valid approval/EC.
Our Reply: No any construction/expansion activity is taken up without Environmental Clearance.
- viii. PA shall clarify any directions of CPCB regarding online monitoring etc.
Our Reply: There is no any direction issued by CPCB with regard to online monitoring etc.
- ix. The information in the enclosed Data-Sheet.
Our Reply: The Data-Sheet with adequate details is enclosed as EC Compliance Annexure - X.

Thanking you,

Yours truly,

For Sandhya Organic Chemicals Pvt. Ltd.



R.J Shah
(General Manager)
Encl.: A/a.

CMPREHENSIVE COMPLIANCE REPORT (IN RESPECT OF THE STIPULATED T&C) OF ENVIRONMENTAL CLEARANCE

(E.C. LETTER NO J-11011/481/2011-IA.II (I) dt. 25/06/2015.)

FOR

M/s. Sandhya Organic Chemicals PVT.LTD.

File
Waliq



Location At:

Plot No. 808 A/2, 3rd Phase,
GIDC Estate, Vapi-396 195, Dist- Valsad (Gujarat).

ENVIRONMENTAL CLEARANCE COMPLIANCE REPORT
(E.C. LETTER NO J-11011/481/2011-IA.II (I) dt. 25/06/2015.)

The compliance of Specific conditions & general conditions of Environmental Clearance are as follows:

List of Finished Products:

Sr. No.	Name of Products	Existing Production (MTPM)	Expansion Production (MTPM)	Total Production after expansion (MTPN)
1.	Aluminum Phosphide	25	75	100
2.	Zinc Phosphide	25	75	100
Name of by-products:				
1.	Phosphoric Acid Un-reacted P ₂ O ₃	25	75	100

Sr. No.	Condition	Compliance status																																		
A.	SPECIFIC CONDITIONS:																																			
1.	National Emission Standards for Pesticide Manufacturing and Formulation Industry issued by the Ministry vide G.S.R. 46(E) dated 3rd February, 2006 and amended time to time shall be followed by the unit.	<p>We regularly monitor the Ambient Air quality as per the National Emission Standard for Pesticide Manufacturing issued by the Ministry vide G.S.R 826 (E) dated 16th November,2009 and amended time to time.</p> <p>The Ambient air quality monitoring test reports (for the period of April.'19 to September'19) are enclosed as Annexure-I.</p> <p>The results of Ambient air quality monitoring is provided in the Table no.1 mention below:</p>																																		
<p style="text-align: center;">Table No.1: Ambient Air Quality Monitoring Data</p> <table><tr><th colspan="6">Ambient Air Quality Monitoring Data (Period : April - 2019 to September - 2019)</th></tr><tr><th rowspan="2">Month & Year</th><th rowspan="2">Date</th><th colspan="4">Parameter with Results</th></tr><tr><th>PM₁₀ µg/m³</th><th>PM_{2.5} µg/m³</th><th>SO₂ µg/m³</th><th>NO₂ µg/m³</th></tr><tr><td>April-2019</td><td>25/04/2019</td><td>92</td><td>37</td><td>24.1</td><td>30.3</td></tr><tr><td>July-2019</td><td>24/07/2019</td><td>54</td><td>19</td><td>13.9</td><td>17.4</td></tr><tr><td colspan="2">CPCB Standard</td><td>100</td><td>60</td><td>80</td><td>80</td></tr></table> <p>Ambient Air quality monitoring is carried out by NABL accredited laboratory M/s. UniStar Environment and Research Labs Pvt. Ltd., Vapi, NABL Certificate No. T-7753, NABL Valid Until: 14.09.2020.</p>			Ambient Air Quality Monitoring Data (Period : April - 2019 to September - 2019)						Month & Year	Date	Parameter with Results				PM ₁₀ µg/m ³	PM _{2.5} µg/m ³	SO ₂ µg/m ³	NO ₂ µg/m ³	April-2019	25/04/2019	92	37	24.1	30.3	July-2019	24/07/2019	54	19	13.9	17.4	CPCB Standard		100	60	80	80
Ambient Air Quality Monitoring Data (Period : April - 2019 to September - 2019)																																				
Month & Year	Date	Parameter with Results																																		
		PM ₁₀ µg/m ³	PM _{2.5} µg/m ³	SO ₂ µg/m ³	NO ₂ µg/m ³																															
April-2019	25/04/2019	92	37	24.1	30.3																															
July-2019	24/07/2019	54	19	13.9	17.4																															
CPCB Standard		100	60	80	80																															
2.	Adequate stack height shall be provided to oil/gas fired boiler/thermopack.	<p>We have provided adequate stack height @ 11 m from the ground level for effective dispersion of flue gaseous during boiler operations.</p> <p>STACK HEIGHT FOR NG BASED BOILER:</p> <ul style="list-style-type: none">Stack height (H) required as per GSR 176(E)<ul style="list-style-type: none">As per formula $H=14Q^{0.3}$ in m$= 14 \times (0.0023)^{0.3}$$= 4.51 \text{ m}$ <p>Where;</p> <p>Total SO₂ produced (Q)= 0.0023 kg/hr [Fuel Consumption Rate= 16666.66 kg/hr; Sulphur Content = 0.0000072%]</p> <ul style="list-style-type: none">Min. stack height required: 11 m <ul style="list-style-type: none">Stack height required as per CTE: 11 mStack height provided: 11 MeterHence the stack heights attached to Boiler is adequate.The Flue gas emission Monitoring test reports are enclosed As Annex.-I.																																		


4.	<p>In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided.</p> <p>Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator and water sprinkling system.</p>	<p>We have installed the closed system for handling & transfer of Chemicals/materials. Further, we are taking care of all possible fugitive emissions from the vulnerable sources in plant. We have installed scrubbing system to control these fugitive emissions. We have hand detection system. The quarterly work place monitoring test report (April'19 to September'19) are enclosed as Annexure-I.</p> <p>The results of work place monitoring is provided in the Table no.3 mention below:</p> <p>The hand detection photograph is provided as fig.no.1.</p> <p style="text-align: center;"><u>Fig.No.1: Hand Detection</u></p> 
	Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions.	We will provide water sprinkling system to control dust emissions at loading and unloading areas.
	Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored and records maintained. The emissions shall conform to the limits stipulated by the GPCB.	<p>We are regularly monitoring, fugitive emissions in the work zone environment; product, raw materials storage area etc. and the records are maintained. The quarterly work place monitoring test report (April'19 to September'19) are enclosed as Annexure-I. The emissions are well within the stipulated limits prescribed by the GPCB.</p> <p>The results of work place monitoring is provided in the Table no.3 mention below:</p>

Table No.3: Work Place Air Quality Monitoring Data

Work Place Air Quality Monitoring Data (Period : April - 2019 to September - 2019)			
Month & Year	Date	Location of sampling/Monitoring	Parameter with Results
			Total Dust mg/m ³
April-2019	26/04/2019	Blending Area	1.4
		Pot Fire Area	0.9
		Tableting Area	0.4
July-2019	24/07/2019	Blending Area	1.2
		Pot Fire Area	1.0
		Tableting Area	0.3
Work Place monitoring was carried out by NABL accredited laboratory M/s. UniStar Environment and Research Labs Pvt. Ltd., Vapi, NABL Certificate No. T-7753, NABL Valid Until: 14.09.2020.			

5.	A proper Leak Detection And Repair (LDAR) Program for pesticide industry shall be prepared and implemented as per CPCB guidelines.	<p>We have leak Detection system and Repair (LDAR) Program for pesticide industry is prepared and implemented as per CPCB guidelines.</p> <p>The LDAR program is provided as fig. no.2.</p>
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		<p>Fig.No.2: LDAR Program</p> 
	<p>Focus shall be given for prevention of fugitive emissions for which preventive maintenance of pumps, valves, pipelines are required. Proper maintenance of mechanical seals of pumps and valves shall be given.</p>	<p>Focus is given for prevention of fugitive emissions for which preventive maintenance of pumps, valves, pipelines are done.</p> <p>The pump photograph is provided as fig.no.3.</p> <p>Fig.No.3: Pump Photographs</p> 
	<p>A preventive maintenance schedule for each unit shall be prepared and adhered to.</p>	<p>A preventive maintenance schedule for each unit is prepared and adhered to.</p>
6.	<p>The gaseous emissions from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.</p>	<p>We have provided Stack height of 11m attached to D.G. Set for dispersion of gaseous emissions. Stack height calculation is as under:</p> $H=h+0.2\sqrt{KVA}$ <p>Where h = height of the building level in meters where the generator set is installed = 6 m, KVA= 125</p> <p>Calculation: $H = 6 + 0.2 \sqrt{125} = 8.23 \text{ m}$</p> <p>Provided stack height is 11 meters which is more than adequate.</p> <p>Acoustic enclosure is provided to abet noise pollution during operation of D.G. Set.</p> <p>The Noise Monitoring test report is enclosed as Annexure-I.</p> <p>The Summary of last six month flue gas emission monitoring results is provided as Tale No.2.</p> <p>The Noise monitoring was carried out by NABL accredited laboratory M/s. UniStar Environment and Research Labs Pvt. Ltd., Vapi,</p> <p>The D.G.Set chimney photograph is provided as fig.no.4.</p>

Fig.No.4: D.G.Set Chimney Photographs



7. The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its 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 GPCB.

We are regularly submitting the status of compliance of the stipulated environmental clearance conditions to the monitoring agencies.

We are regularly submitting Comprehensive EC compliance report for the period of April to September and October to March to the Ministry's regional office at Bhopal well within the stipulated date.

The Six-Monthly EC Compliance Submission dates for the last three year are as under:

1. Period of April'17 to Sept'17, Date: 29.11.2017.
2. Period of October'17 to March'18. Date: 25.05.2018.
3. Period of April'18 to Sept'18, Date: 26.12.2018.
4. Period of October'18 to March'19. Date: 22.05.2019.

The Six Monthly EC Compliance Submission Acknowledge copies are provided as fig.no.5, 6, 7 and 8.

Fig.No.5:EC Compliance Submission Ack. copy

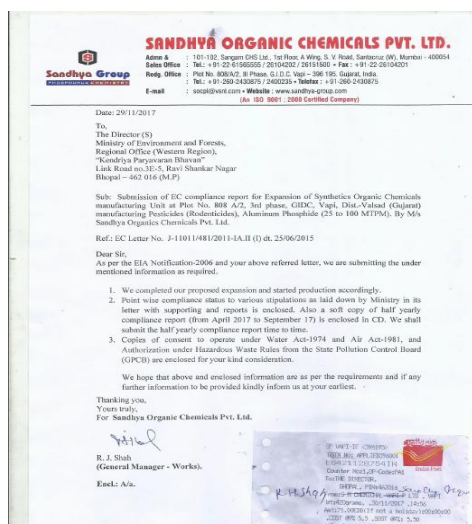


Fig.No.6:EC Compliance Submission Ack. copy

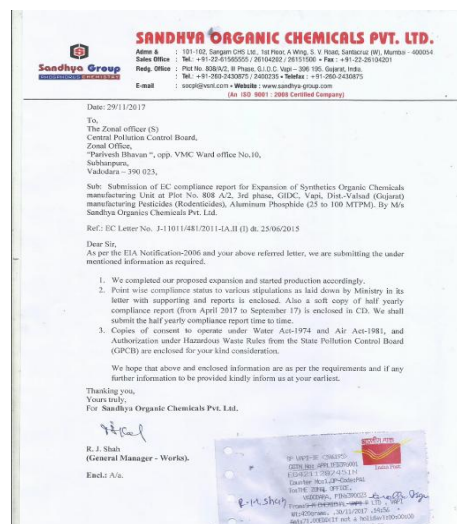


Fig.No.7:EC Compliance Submission Ack. copy

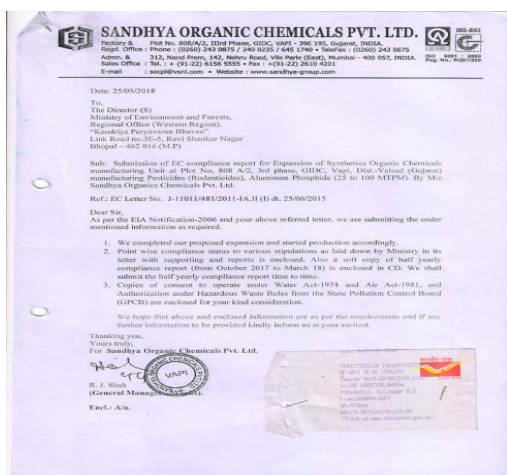
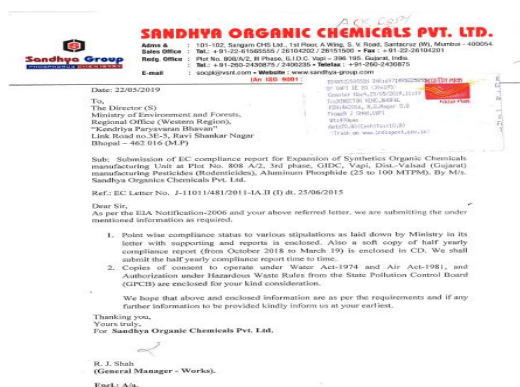


Fig.No.8:EC Compliance Submission Ack. copy



The levels of PM₁₀, PM_{2.5}, SO₂, NO_x, CO and VOC in ambient air and emissions from the stacks shall be monitored and displayed at a convenient location near the main gate of the company and at important public places.

The level of PM₁₀, SO_x, NO_x, CO and VOCs in ambient air are monitored and displayed at location near the main gate of the company. The main gate displayboard photograph is provided as fig.no.9.

Fig.No.9:Main Gate Display Board



8. Solvent management shall be carried out as follows :
 - i. Chilled brine circulation system shall be provided to condensate solvent vapors and reduce solvent losses. It shall be ensured that solvent recovery should not be less than 95%.
 - ii. Reactor and solvent handling pump shall have mechanical seals to prevent leakages.
 - iii. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.
 - iv. Solvents shall be stored in a separate space specified with all safety measures.
 - v. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.
 - vi. Entire plant shall be flame proof. The solvent storage tanks should be provided with breather valve to prevent losses.

There is no any kind of Solvent to be used in manufacturing process of phosphide products; Hence this condition is not applicable.

9.	Total fresh water requirement from GIDC water supply shall not exceed 20 m ³ /day.	<p>The water requirement is met from GIDC water supply, Vapi, which is not exceeding 20 m³/day. There was some new as well as repairing of construction work therefore consumption of water appear as deviation.</p> <p>The water permission letter and last six month water consumption is provided as fig.no.9 and 10. The water balance diagram is provided as fig.no.19.</p> <p>The last six month water supply Bill is provided as fig. No. 10, 11, 12, 13, 14, 15, 16, 17 and 18.</p>
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Fig.No.10: Water permission Letter

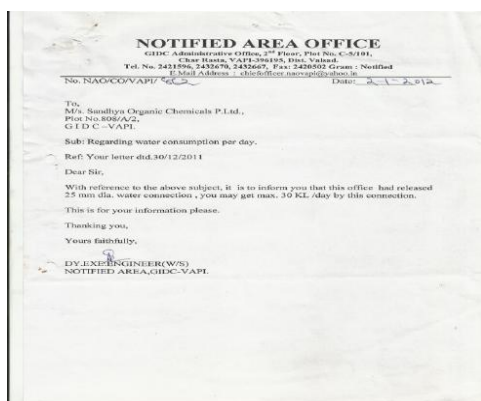


Fig.No.11: Last Six month Water consumption data

Sr. No.	Month/Year	Water Consumption KL/Day		Monthly Consumption KL
		Maximum	Minimum	
1.	April-2019	36	9	727
2.	May-2019	32	0	547
3.	June-2019	35	1	409
4.	July-2019	Nil	Nil	Nil
5.	August-2019	31	2	366
6.	September-2019	35	0	337

Fig.No.12: Water Balance Diagram

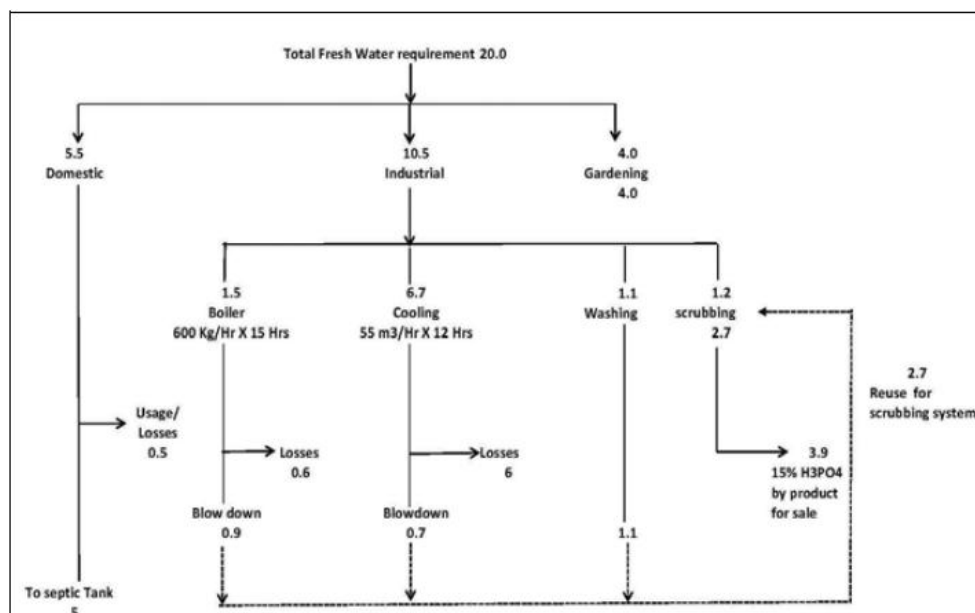


Fig.No.13:Water Supply Bill - April-19

NOTIFIED AREA AUTHORITY Second Floor, G.I.D.C. Administrative Office, Plot No. 313/1, N. Char Rasta, G.I.D.C., Vapi. Ph: 2421897

Water Supply Bill CONSUMER COPY

Party Name: S. M. CHEMICAL Sandhya Organic Chemicals Pvt. Ltd. Unit - III, Plot No. 313/1, 40 Shed, II Phase, G.I.D.C., Vapi-395105, Dist. Valsad, Gujarat, India.

Property: 3131 G.I.D.C., Vapi

Category: Industrial Size (m.m.): 25 Connection No.: 28882

Bill No.: 82681 Bill Month: Apr-2019 Bill Date: 15-May-2019

Your Account Summary

Total Outstanding Amount	0.00	Total Interest	0.00	This Month's Charges	37,891.50	Total Payable By	37,891.50
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Last Date: 30-May-2019

This Month's Charges

Meter Status:	Normal	Outstanding	0.00
Current Reading	1023	Interest	0.00
Previous Reading	1006	Penal Interest	0.00
Consumption	17	This Month's Charges	37,891.50
Rate / 1000 Ltr.	42.50	Gross Amount	37,891.50
Normal Water Usages Charge	37,891.50	Net Amount (Before Last Date)	37,891.50
Excess Water Usages Charge	0.00	Amount Payable After Last Date	0.00
Fix Charges	13,800.00	Total Interest	0.00
Penalty	0.00	Gross Amount	38,529.20
Adjustment	0.00	Net Amount (After Last Date)	38,529.20
This Month's Charge	37,891.50		

Payment Mode Amount Date Cheque/D.D. No. Date Bank Branch

Cheque/D.D./Cash 37,891.50 27/05/19 000724 24/05/19 ICICI Vapi

Dy. EX. Engineer (WIS) N.A. G.I.D.C. VAPI

Fig.No.14:Water Supply Bill- May-19

NOTIFIED AREA AUTHORITY Second Floor, G.I.D.C. Administrative Office, Plot No. 313/1, N. Char Rasta, G.I.D.C., Vapi. Ph: 2421897

Water Supply Bill CONSUMER COPY

Party Name: S. M. CHEMICAL Sandhya Organic Chemicals Pvt. Ltd. Unit - III, Plot No. 313/1, 40 Shed, II Phase, G.I.D.C., Vapi-395105, Dist. Valsad, Gujarat, India.

Property: 3131 G.I.D.C., Vapi

Category: Industrial Size (m.m.): 25 Connection No.: 28882

Bill No.: 82686 Bill Month: May-2019 Bill Date: 13-Jun-2019

Your Account Summary

Total Outstanding Amount	0.00	Total Interest	0.00	This Month's Charges	35,167.50	Total Payable By	35,167.50
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Last Date: 30-Jun-2019

This Month's Charges

Meter Status:	Normal	Outstanding	0.00
Current Reading	1019	Interest	0.00
Previous Reading	1002	Penal Interest	0.00
Consumption	17	This Month's Charges	35,167.50
Rate / 1000 Ltr.	42.50	Gross Amount	35,167.50
Normal Water Usages Charge	35,167.50	Net Amount (Before Last Date)	35,167.50
Excess Water Usages Charge	0.00	Amount Payable After Last Date	0.00
Fix Charges	13,800.00	Total Interest	0.00
Penalty	0.00	Gross Amount	35,604.35
Adjustment	0.00	Net Amount (After Last Date)	35,604.35
This Month's Charge	35,167.50		

Payment Mode Amount Date Cheque/D.D. No. Date Bank Branch

Cheque/D.D./Cash 35,167.50 27/06/19 000683 24/06/19 ICICI Vapi

Dy. EX. Engineer (WIS) N.A. G.I.D.C. VAPI

Fig.No.15:Water Supply Bill - June-19

NOTIFIED AREA AUTHORITY Second Floor, G.I.D.C. Administrative Office, Plot No. 313/1, N. Char Rasta, G.I.D.C., Vapi. Ph: 2421897

Water Supply Bill CONSUMER COPY

Party Name: S. M. CHEMICAL Sandhya Organic Chemicals Pvt. Ltd. Unit - III, Plot No. 313/1, 40 Shed, II Phase, G.I.D.C., Vapi-395105, Dist. Valsad, Gujarat, India.

Property: 3131 G.I.D.C., Vapi

Category: Industrial Size (m.m.): 25 Connection No.: 28882

Bill No.: 83407 Bill Month: Jun-2019 Bill Date: 15-Jul-2019

Your Account Summary

Total Outstanding Amount	0.00	Total Interest	0.00	This Month's Charges	30,783.00	Total Payable By	30,783.00
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Last Date: 30-Jul-2019

This Month's Charges

Meter Status:	Normal	Outstanding	0.00
Current Reading	1020	Interest	0.00
Previous Reading	1003	Penal Interest	0.00
Consumption	17	This Month's Charges	30,783.00
Rate / 1000 Ltr.	42.50	Gross Amount	30,783.00
Normal Water Usages Charge	30,783.00	Net Amount (Before Last Date)	30,783.00
Excess Water Usages Charge	0.00	Amount Payable After Last Date	0.00
Fix Charges	13,800.00	Total Interest	0.00
Penalty	0.00	Gross Amount	31,218.00
Adjustment	0.00	Net Amount (After Last Date)	31,218.00
This Month's Charge	30,783.00		

Payment Mode Amount Date Cheque/D.D. No. Date Bank Branch

Cheque/D.D./Cash 30,783.00 27/07/19 000954 27/07/19 ICICI Vapi

Dy. EX. Engineer (WIS) N.A. G.I.D.C. VAPI

Fig.No.16:Water Supply Bill - July-19

NOTIFIED AREA AUTHORITY Second Floor, G.I.D.C. Administrative Office, Plot No. 313/1, N. Char Rasta, G.I.D.C., Vapi. Ph: 2421897

Water Supply Bill CONSUMER COPY

Party Name: S. M. CHEMICAL Sandhya Organic Chemicals Pvt. Ltd. Unit - III, Plot No. 313/1, 40 Shed, II Phase, G.I.D.C., Vapi-395105, Dist. Valsad, Gujarat, India.

Property: 3131 G.I.D.C., Vapi

Category: Industrial Size (m.m.): 25 Connection No.: 28882

Bill No.: 83941 Bill Month: Jul-2019 Bill Date: 14-Aug-2019

Your Account Summary

Total Outstanding Amount	0.00	Total Interest	0.00	This Month's Charges	13,800.00	Total Payable By	13,800.00
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Last Date: 31-Aug-2019

This Month's Charges

Meter Status:	Normal	Outstanding	0.00
Current Reading	1014	Interest	0.00
Previous Reading	1001	Penal Interest	0.00
Consumption	13	This Month's Charges	13,800.00
Rate / 1000 Ltr.	42.50	Gross Amount	13,800.00
Normal Water Usages Charge	13,800.00	Net Amount (Before Last Date)	13,800.00
Excess Water Usages Charge	0.00	Amount Payable After Last Date	0.00
Fix Charges	13,800.00	Total Interest	0.00
Penalty	0.00	Gross Amount	13,800.00
Adjustment	0.00	Net Amount (After Last Date)	13,800.00
This Month's Charge	13,800.00		

Payment Mode Amount Date Cheque/D.D. No. Date Bank Branch

Cheque/D.D./Cash 13,800.00 28/08/19 001295 26/08/19 ICICI Vapi

Dy. EX. Engineer (WIS) N.A. G.I.D.C. VAPI

Fig.No.17:Water Supply Bill- August-19

NOTIFIED AREA AUTHORITY Second Floor, G.I.D.C. Administrative Office, Plot No. 313/1, N. Char Rasta, G.I.D.C., Vapi. Ph: 2421897

Water Supply Bill CONSUMER COPY

Party Name: S. M. CHEMICAL Sandhya Organic Chemicals Pvt. Ltd. Unit - III, Plot No. 313/1, 40 Shed, II Phase, G.I.D.C., Vapi-395105, Dist. Valsad, Gujarat, India.

Property: 3131 G.I.D.C., Vapi

Category: Industrial Size (m.m.): 25 Connection No.: 28882

Bill No.: 84255 Bill Month: Aug-2019 Bill Date: 12-Sep-2019

Your Account Summary

Total Outstanding Amount	-13,800.00	Total Interest	0.00	This Month's Charges	28,574.00	Total Payable By	15,774.00
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Last Date: 31-Sep-2019

This Month's Charges

Meter Status:	Normal	Outstanding	-13,800.00
Current Reading	1019	Interest	0.00
Previous Reading	1002	Penal Interest	0.00
Consumption	17	This Month's Charges	28,574.00
Rate / 1000 Ltr.	42.50	Gross Amount	15,774.00
Normal Water Usages Charge	28,574.00	Net Amount (Before Last Date)	15,774.00
Excess Water Usages Charge	0.00	Amount Payable After Last Date	0.00
Fix Charges	13,800.00	Total Interest	0.00
Penalty	0.00	Gross Amount	15,967.80
Adjustment	0.00	Net Amount (After Last Date)	15,967.80
This Month's Charge	28,574.00		

Payment Mode Amount Date Cheque/D.D. No. Date Bank Branch

Cheque/D.D./Cash 15,774.00 23/09/19 001363 19/09/19 ICICI Vapi

Dy. EX. Engineer (WIS) N.A. G.I.D.C. VAPI

Fig.No.18:Water Supply Bill - September-19

NOTIFIED AREA AUTHORITY Second Floor, G.I.D.C. Administrative Office, Plot No. 313/1, N. Char Rasta, G.I.D.C., Vapi. Ph: 2421897

Water Supply Bill CONSUMER COPY

Party Name: S. M. CHEMICAL Sandhya Organic Chemicals Pvt. Ltd. Unit - III, Plot No. 313/1, 40 Shed, II Phase, G.I.D.C., Vapi-395105, Dist. Valsad, Gujarat, India.

Property: 3131 G.I.D.C., Vapi

Category: Industrial Size (m.m.): 25 Connection No.: 28882

Bill No.: 85888 Bill Month: Sep-2019 Bill Date: 19-Oct-2019

Your Account Summary

Total Outstanding Amount	0.00	Total Interest	0.00	This Month's Charges	36,130.00	Total Payable By	36,130.00
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Last Date: 31-Oct-2019

This Month's Charges

Meter Status:	Normal	Outstanding	0.00
Current Reading	1019	Interest	0.00
Previous Reading	1002	Penal Interest	0.00
Consumption	17	This Month's Charges	36,130.00
Rate / 1000 Ltr.	42.50	Gross Amount	36,130.00
Normal Water Usages Charge	36,130.00	Net Amount (Before Last Date)	36,130.00
Excess Water Usages Charge	0.00	Amount Payable After Last Date	0.00
Fix Charges	13,800.00	Total Interest	0.00
Penalty	0.00	Gross Amount	36,670.17
Adjustment	0.00	Net Amount (After Last Date)	36,670.17
This Month's Charge	36,130.00		


Payment Mode Amount Date Cheque/D.D. No. Date Bank Branch

Cheque/D.D./Cash 36,130.00 22/10/19 000231 19/10/19 ICICI Vapi

Dy. EX. Engineer (WIS) N.A. G.I.D.C. VAPI

10. As proposed, industrial effluent generation shall not exceed 2.7 m³/day. Industrial effluent will be used scrubbing media. Phosphoric acid will be generated as by-product.
- Domestic effluent shall be treated in the STP. Treated effluent shall be reused for gardening / horticulture purpose.
11. No effluent shall be discharged outside the plant premises and 'Zero' effluent discharge concept shall be followed.
12. Online Monitoring (24x7) system to be installed

- No wastewater is generated from industrial process; Water from washing is reused for scrubbing system. Total washing and scrubbing water is used to scrub phosphorous pent oxide to recover Phosphoric Acid as by product.
- Domestic waste water generated is disposed off through septic tank into soak pit.
- There is no generation of industrial effluent from our industrial activities. We are a ZLD (zero effluent discharge) unit.
- There is no wastewater is generated from

	within treatment plant and data to be uploaded on the company's website.	industrial process hence there is no treatment plant. Hence this condition is Not Applicable.
13.	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	There is no generation of industrial effluent from our industrial activities. We are a ZLD (zero effluent discharge) unit; Hence this condition is Not Applicable.
14.	Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be by pumps.	<p>Hazardous chemicals have been stored in tanks in tank farms. Flame arresters have been provided on tank farm.</p> <p>The tank dyke wall photograph is provided as fig.no.19.</p> <p>There is no solvent, Hence this condition is Not Applicable.</p> <p><u>Fig.No.19 :Tank Dyke wall photograph</u></p> 
15.	The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2008 and amended as on date for management of Hazardous wastes and prior permission from GPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. Measures shall be taken for firefighting facilities in case of emergency. Membership of TSDF for hazardous waste disposal shall be obtained.	<p>We obtained the Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-Boundary Movement) Rules, 2016 and amended as on date for management of Hazardous wastes.</p> <p>The copy of consolidated consent and authorization is enclosed as Annexure-II (CC&A from GPCB).</p> <ul style="list-style-type: none"> • CC&A Order No: AWH-102165, • Date of issue: 10.06.2019. • Valid up to: 31.03.2024.
16.	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended in October, 1994 and January, 2000. All Transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	<p>We strictly follow the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended in October, 1994 and January, 2000. The Transportation of Hazardous Chemicals is as per the Motor Vehicle Act (MVA), 1989.</p> <ul style="list-style-type: none"> • Shall not smoke while on duty. • We maintain the vehicle in a clean and sanitary condition during its use in a public place. • No person drives a transport vehicle unless an authorization in the driving license granted by the licensing authority. • We have provide Class labels.- In respect of the dangerous or hazardous goods specified in.
17.	The unit shall make the arrangement for	We have provided the fire-fighting facility for

protection of possible fire hazards during Manufacturing process in material handling. Fire fighting system shall be as per the norms.

protection of possible fire hazards during Manufacturing process in material handling. The list of Fire Extinguisher and Fire Extinguisher Photographs are provided as fig. No. 20, 21, 22, 23, 24 and 25.

Fig.No.20: List of Fire Extinguisher

SANDHYA ORGANIC CHEMICALS PVT.LTD.						30-09-2019
List of Fire Extinguisher						
(Format No: FHEEDS47 - Rev No: 00 - Issue Date: 01/01/18)						
Sr. No.	Type	Capacity	Refill Date	Expiry date	Location	
1	DCP	5 KG	28/12/2018	28/12/2019	Office	
2	DCP	5 KG	03/09/2019	03/09/2020	Raw Material Godown	
3	DCP	5 KG	03/09/2019	03/09/2020	Finished Goods Godown	
4	DCP	10 KG	03/09/2019	03/09/2020	Tablet Dept Entry Point	
5	DCP	5 KG	03/09/2019	03/09/2020	Tablet Dept (Tablets M/C Area)	
6	DCP	5 KG	03/09/2019	03/09/2020	Urea Dryer	
7	DCP	5 KG	28/12/2018	28/12/2019	Near Blender	
8	DCP	10 KG	03/09/2019	03/09/2020	Zinc Dept (Gr. Floor)	
9	CO2	4.5 KG	03/09/2019	03/09/2020	Electric Panel Board Room	
10	ABC	5 KG	03/09/2019	03/09/2020	G.S.P.C. Gas Station	
11	ABC	3 KG	28/09/2019	27/09/2020	Ground Floor - Office	
12	ABC	3 KG	28/09/2019	27/09/2020	First Floor - QA Lab	
						
Prepared By						Approved by

Fig.No.21: Fire Extinguisher Photographs



Fig.No.22: Fire Extinguisher Photographs



Fig.No.23: Fire Extinguisher Photographs



Fig.No.24: Fire Bucket Photographs



Fig.No.25: Fire Bucket Photographs



18. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.

Occupational health surveillance of the workers is done on a regular basis and the records (of medical examination report) are maintained as per the Factories Act. The total 49 employee people in our unit. We have separate occupational health to carry out the different activities of occupational health

The Full time Dr. appointment letter and annual medical checkup details of employees are provided as fig.no. 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36 and 37.

Fig.No.27: Occupational Health Center Photographs



Fig.No.29: Occupational Health Center Photographs



Fig.No.30: Appointment of Doctor- Pre/Post Checkup

SANDHYA ORGANIC CHEMICALS PVT. LTD.
 Sandhya Group
 23-09-2017

Appointment for Part time Doctor

To,
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H. (774)
 Industrial Health Physician
 Tirvel Clinic,
 And, Dist. Vadod

Dear Sir,

With reference to our personal discussion, we are pleased to appoint you as a part time Medical Officer w.e.f. 23-09-2017 to 31-03-2019 on the following terms and conditions.

- You will be paid Rs.6000/- (Rupees Six Thousand Only) per month as consultant charges for said services as part time Medical Officer and the same shall be paid on monthly basis before 15th of next month.
- Your services will be on the contractual basis for the period of 23-09-2017 to 31-03-2019.
- You will be required to visit our factory minimum twice in a week.
- You may be required to visit the factory in case of any emergency.
- You will be required to make the compliance of Factories Act and also maintain Health Register etc. as per the requirement of law.

This letter is in addition to appointment as a Medical Officer for half yearly/annual routine medical check-up to our employees as required by the department of industrial safety, state of Gujarat. You will be paid extra charges for above routine check-up.

- You will also carrying out pre-employment medical check-up for our new entrants.
- You will submit us all the reports as per the laid down rules and regulation in the register required by the department of industrial safety, state of Gujarat.
- During your association with us you will be governed by the rules of organization. You will be required to carry your own instruments required for medical check-up.
- The organization is covered under ISC as well as Workmen Compensation Policy, hence, in case of the employees covered under the scheme, which needs through check-up to be referred to the dispensary.
- You will not be entitled to claim the permanency job.
- The contract can be terminated by either of the party after giving a month notice of his intention in writing.

We hope the above terms and conditions are in order and equally acceptable to you.

In token of acceptance kindly put your signature on duplicate copy of this letter.

For Sandhya Organic Chemicals Pvt. Ltd.
 Authorized Signatory: *[Signature]*
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H.
 Industrial Health Physician

Fig.No.31:Employee medical Checkup report

Occufitt
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H.
 Consulting Industrial Physician

Medical Checkup Report

Name of Industry : SANDHYA ORGANIC CHEMICALS PVT. LTD. VAPI
 List of Employees : 03-May-2019

No.	Name	Birth Date	Blood Group	Sr. No.
1	ADARSH KUMAR SINGH	01-Jun-1988	O Positive	33
2	ADARSH KUMAR SINGH	09-Apr-1989	O Positive	3
3	ADARSH KUMAR SINGH	14-Mar-1970	AB Positive	5
4	ADARSH KUMAR SINGH	01-Jun-1991	A Positive	17
5	ADARSH KUMAR SINGH	31-May-1982	A Positive	20
6	ADARSH KUMAR SINGH	12-Feb-1971	O Positive	2
7	ADARSH KUMAR SINGH	01-Jun-1982	A Positive	36
8	ADARSH KUMAR SINGH	18-Jul-1990	O Positive	25
9	ADARSH KUMAR SINGH	02-Oct-1974	O Positive	13
10	ADARSH KUMAR SINGH	15-Dec-1972	B Positive	10
11	ADARSH KUMAR SINGH	25-Jul-1989	O Positive	22
12	ADARSH KUMAR SINGH	21-Aug-1984	B Positive	3
13	ADARSH KUMAR SINGH	01-Jun-1978	O Positive	34
14	ADARSH KUMAR SINGH	05-Jun-1982	A Positive	16
15	ADARSH KUMAR SINGH	22-Aug-1980	A Positive	8
16	ADARSH KUMAR SINGH	20-Nov-1972	A Positive	31
17	ADARSH KUMAR SINGH	15-May-1972	A Positive	11
18	ADARSH KUMAR SINGH	01-Jun-1982	A Positive	24
19	ADARSH KUMAR SINGH	08-May-1988	A Negative	28
20	ADARSH KUMAR SINGH	10-Aug-1993	AB Positive	15
21	ADARSH KUMAR SINGH	01-Jun-1972	A Positive	45
22	ADARSH KUMAR SINGH	21-Sep-1987	AB Negative	40
23	ADARSH KUMAR SINGH	08-Aug-1975	B Positive	39
24	ADARSH KUMAR SINGH	02-Feb-1979	O Positive	26
25	ADARSH KUMAR SINGH	24-Dec-1986	O Positive	21
26	ADARSH KUMAR SINGH	01-Feb-1979	A Positive	27
27	ADARSH KUMAR SINGH	21-Jan-1991	A Positive	43
28	ADARSH KUMAR SINGH	01-Jun-1973	O Positive	6
29	ADARSH KUMAR SINGH	01-Jun-1972	AB Positive	14
30	ADARSH KUMAR SINGH	01-May-1989	B Positive	42
31	ADARSH KUMAR SINGH	04-May-1997	O Positive	18
32	ADARSH KUMAR SINGH	10-Oct-1986	O Positive	12
33	ADARSH KUMAR SINGH	01-Feb-1988	O Positive	19
34	ADARSH KUMAR SINGH	13-Sep-1982	O Positive	7
35	ADARSH KUMAR SINGH	12-Jul-1991	B Positive	32
36	ADARSH KUMAR SINGH	01-Jul-1984	AB Positive	37
37	ADARSH KUMAR SINGH	10-Aug-1991	B Positive	4
38	ADARSH KUMAR SINGH	01-Jun-1982	B Positive	46
39	ADARSH KUMAR SINGH	03-Apr-1978	B Positive	48
40	ADARSH KUMAR SINGH	16-May-1973	AB Negative	47
41	ADARSH KUMAR SINGH	17-Jul-1979	A Positive	47
42	ADARSH KUMAR SINGH	06-Dec-1985	O Positive	30

Fig.No.32:Employee medical Checkup report

Occufitt
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H.
 Consulting Industrial Physician

Medical Checkup Report

Name of Industry : SANDHYA ORGANIC CHEMICALS PVT. LTD. VAPI
 List of Employees : 03-May-2019

No.	Name	Birth Date	Blood Group	Sr. No.
43	ADARSH KUMAR SINGH	18-Jun-1991	O Positive	29
44	ADARSH KUMAR SINGH	10-Dec-1988	B Positive	39
45	ADARSH KUMAR SINGH	21-Jul-1991	A Positive	41
46	ADARSH KUMAR SINGH	10-Jul-1983	B Negative	38
47	ADARSH KUMAR SINGH	01-Jul-1989	B Positive	5

Fig.No.33:Employee medical Checkup report

Occufitt
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H.
 Consulting Industrial Physician

Medical Checkup Report

Name of Industry : SANDHYA ORGANIC CHEMICALS PVT. LTD. VAPI
 Name : DINESH RAMESHBHAI BARI
 Department : Production
 Age : 48 yrs Sex : Male

Present Complaints : Nil

Personal History : Nothing particular
 Family History : Nothing particular
 Habits : Nil
 Allergy : Nil

Occupational exposure : Furnace, manual handling

Height : 163 cms Chest : 80.54 cms Waist : 76 cms BMI : 23.38 (Normal 18 to 25)
 Weight : 54.1 Kgs (Normal / expanded)
 Hsp : 83 cms Waist/Hip : 0.92 (N upto 0.95)
 Lymph nodes : Not palpable
 Varicose veins : Absent
 Oral hygiene : Good

Vision : R L
 Near : 6/6 6/6
 Far : 6/6 6/6
 Corneal vision : Normal
 Glasses : Yes

Cardio-vascular system :
 Pulse : 72 per min. S.P. : 124/80 mm of Hg. Heart sounds : Normal
 Others : Nil

Respiratory system :
 Respiratory sounds : Normal Others : Nil
 Auscultatory system : Normal
 Liver : Not palpable Spleen : Not palpable Hemis : Absent
 Central nervous system :
 Reflexes : Normal Jerks : Normal Others : Nil
 Orientation to time / Place / Person / Cerebellar sign : NAD

Musculo-skeletal system :
 Physical deformity : Nil
 Tenderness : Absent
 Ear-nose-throat : NAD
 Genito-urinary system : NAD
 Hydrotile : Absent
 Skin : Normal

Other Findings :
 Page 1 of 3

Fig.No.34:Employee medical Checkup report

Occufitt
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H.
 Consulting Industrial Physician

Medical Checkup Report

Name of Industry : SANDHYA ORGANIC CHEMICALS PVT. LTD. VAPI
 Name : DINESH RAMESHBHAI BARI
 Department : Production
 Age : 48 yrs Sex : Male

LABORATORY INVESTIGATIONS

Hematology :
 Total R.B.C. Count : 4.65 x10¹²/mm³
 Hemoglobin : 12.7 g/dl
 Total W.B.C. Count : 4700 /mm³

Differential count :
 Neutrophils : 38 %
 Eosinophils : 05 %
 Lymphocytes : 56 %
 Monocytes : 01 %
 Basophils : 00 %

ESR :
 Platelets : 267000 /mm³

Blood Group : O Positive

Urine Examination :
 Physical examination :
 Color : Pale yellow
 Appearance : Clear
 Odor : Absent
 Chemical Examination :
 Albumin : Absent
 Sugar : Absent
 Bilirubin : Absent
 Microscopic Examination :
 Epithelial cells : 3-4 H. P. F.
 Pus cells : 3-4 H. P. F.
 Red blood cells : Absent
 Parasites : Absent

Other Test :
 Blood sugar (F) : 65 mg/dl
 S. Cholesterol : 190 mg/dl
 S. Cholesterol : 505 mg/dl

Quantity received : 12, cms
 Specific gravity : 1.020

Reaction :
 Bile salts : Absent
 Bile pigments : Absent
 Urobilinogen : Normal

Casts :
 Crystals : Absent
 Anticrystalline deposits : Absent

FOR REGISTRATION
 REGISTRATION NO. 22533, Vadod
 Page 2 of 3

Fig.No.35:Employee medical Checkup report

Occufitt
 Dr. Ketan S. Desai
 M.B.B.S., D.I.T.H.
 Consulting Industrial Physician

Medical Checkup Report

Name of Industry : SANDHYA ORGANIC CHEMICALS PVT. LTD. VAPI
 Name : DINESH RAMESHBHAI BARI
 Department : Production
 Age : 48 yrs Sex : Male

X-Ray :
 Not done

Audiometry :
 Not done

Pulmonary Function Test :
 Normal spirometry

ECG :
 Not done

Observations :
 Nil

Occupational :
 Nil

Employee is free from any contagious diseases and is fit to work in plant / office.

Advise :
 Nil

DR. KETAN S. DESAI
 M.B.B.S., D.I.T.H.
 Page 3 of 3

Fig.No.36:Employee medical Checkup report

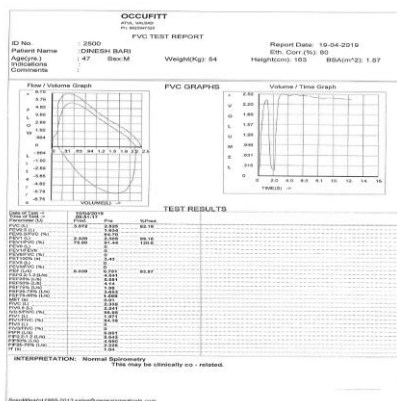
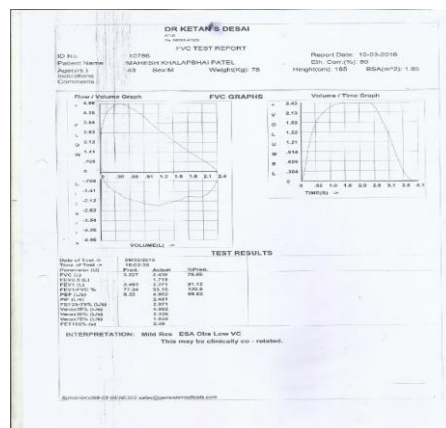


Fig.No.37:Employee medical Checkup report



19. As proposed, green belt over 1785 m2 area shall be developed within plant premises with at least 10 meter wide green belt on all sides along the periphery of the project area, in downward direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO.




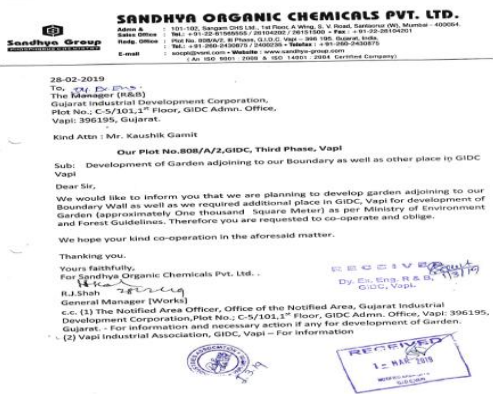


Greenbelt has been developed as per the guidelines of CPCB, under the supervision of experienced personnel and guidance of local experts. The company has developed greenbelt in about 1785 sq. m. land out of total land of 5336 sq. m. MoEF officer during the visit on dated 19 October 2019 he suggests for kept Flower Pot both the side on Road. The green belt photographs and green belt layout is provided as fig. no. 38, 39, 40, 41, 42, 44 and 45. The common GIDC Space green belt development plant letter is provided as fig.no.43.

Fig.No.38: Green Belt Photographs



Fig.No.39: Green Belt Photographs



	<p><u>Fig.No.40: Green Belt Photographs</u></p> 	<p><u>Fig.No.41: Green Belt Photographs</u></p> 
	<p><u>Fig.No.42: Green Belt Photographs</u></p> 	<p><u>Fig.No.43: Common GIDC Space Green belt development Letter.</u></p> 
	<p><u>Fig.No.44: Green Belt Photographs</u></p> 	<p><u>Fig.No.45: Green Belt Photographs</u></p> 
20.	The company shall make the arrangement for protection of possible fire and explosion hazards during manufacturing process in material handling.	<p>We comply with this condition. We have taken the steps for protection of possible fire and explosion hazards during manufacturing process in material handling.</p> <p>We have provided the fire-fighting facility for protection of possible fire hazards during Manufacturing process in material handling.</p> <p>The list of Fire Extinguisher and Fire Extinguisher Photographs are provided in above condition no.17 as a fig. No. 28, 29, 30, 31, 32 and 33.</p>
21.	At least 2.5 % of the total cost of the project	Our unit is small scale unit. So we have been done

should be earmarked towards the Enterprise social responsibility based on need based item-wise details along with time bound action plan should be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program should be ensured accordingly in a time bound manner.

the CSR activity. The detail of CSR activity is enclosed as **Annexure-IV**.
The CSR Activity photographs are provided as fig. No. 46, 47, 48, 49, 50 and 51.
The details of activities undertaken & financial details for same areas provided in the Table no.5 mention below:
Contribution to:

Table No.4: CSR Chart

Sr. No.	CSR Expenses	Amount Paid in Rs. (For the year 2017-2018)
1.	Local School	5.00 Lac
2.	Smasanbhumi	11.00 Lac
3.	Cricket Tournament	50,000
4.	Arrangement for blood donation camp.	20,000
5.	Arrangement for Eye camp.	25,000
6.	Development of Maroli Circle	15.00 Lac
7.	Barricade for traffic control	15,000
	Total	32,10,000

Fig.No.46: CSR Activity Photographs



Fig.No.47: CSR Activity Photographs

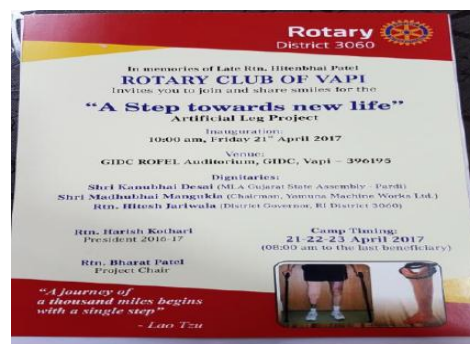




Fig.No.48: CSR Activity Photographs



Fig.No.49: CSR Activity Photographs



	<p>Fig.No.50: CSR Activity Photographs</p> 	<p>Fig.No.51: CSR Activity Photographs</p> 
22.	<p>Provision shall be made for the housing for the construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structure to be removed after the completion of the project.</p> <p>All the construction wastes shall be managed so that there is no impact on the surrounding environment.</p>	<p>We had hired only the local labors during construction phase. Hence this condition was not applicable.</p> <p>All the construction wastes was properly managed to prevent any impact on the surrounding environment.</p>
B.	GENERAL CONDITIONS:	
1.	<p>The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any other statutory authority</p>	<p>We do comply with the conditions.</p> <ul style="list-style-type: none"> We have started the quarterly monitoring of all applicable parameters of the process stack emissions as per the CC&A issued by the GPCB. There is no effluent generation from process. Ambient Air Quality is also being monitored regularly on monthly bases as per the CPCB guidelines of AAQ monitoring. The CC&A Compliance report and test report of Monitoring of Stack, AAQM are enclosed as Annexure- IX.
2.	<p>No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.</p>	<p>We undertake that, we shall not carry out any expansion without prior approval of the Ministry of Environment and Forest. There is no deviation/ alternation in the project. Present manufacturing quantity is well within the sanctioned limits for the same."</p>
3.	<p>The locations of ambient air quality monitoring stations shall be decided in consultation with the Gujarat Pollution Control Board (GPCB) and it shall be ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.</p>	<ul style="list-style-type: none"> The location of ambient air quality monitoring station was decided in consultation with GPCB. We have set up the location of AAQ station on the near security office and near admin office. Ambient Air Quality is also being monitored on quarterly bases as per the CPCB guidelines of AAQ monitoring. The Test reports of AAQM are enclosed as Annexure-I.

4.	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	<ul style="list-style-type: none"> We regularly monitor noise level within the premises through NABL accredited laboratory. The test report of which are enclosed herewith as Annexure: I. The ambient noise level are well within the permissible limit prescribed under Environment (protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time). The Summary of noise level monitoring is provided in the Table no.5 mention below:
----	--	---

Table No.5: Noise Monitoring Data

Noise Monitoring Data(Period : April – 2019 to September - 2019)						
Month /Year	Date of Monitoring	Time of Monitoring	Within Company premises			
			Noise Level dB (A)			
			Direction			
			East	West	South	North
April-2019	25/04/2019	Day Time	62.1	72.3	68.7	66.2
		Night Time	55.7	67.1	61.8	59.4
		Outside D.G. Set (125 KVA) (Day Time)	73.1	73.5	73.2	72.7
July-19	24/07/2019	Day Time	61.9	70.6	67.4	64.7
		Night Time	53.5	64.8	60.5	58.1
		Outside D.G. Set (125 KVA) (Day Time)	72.8	73.6	73.4	72.5
NOTE: Permissible Limit CPCB (Day Time): <75 Db(A), Permissible Limit CPCB (Night Time): <70 Db(A)						
Noise monitoring was carried out by NABL accredited laboratory M/s. UniStar Environment and Research Labs Pvt. Ltd., Vapi, NABL Certificate No. T-7753, NABL Valid Until: 14.09.2020.						

5.	The Company shall harvest rainwater from the roof-tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	We are harvesting rainwater. The harvested rainwater is collected in reserve tank having capacity of 50 KL and the same is used for our industrial purpose during the monsoon season. Since, our project is situated in the GIDC Industrial Area of Vapi having clusters of chemical industries; the groundwater recharge may contaminate the groundwater in due course. Hence, GIDC is not allowing groundwater recharge.
6.	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic wastewater and storm water drains.	We assure to maintain zero spillages during handling and transfer of raw materials. However we have provided garland drain to avoid mixing of accidental spillages with domestic waste water or storm water.
7.	Usage of Personnel Protection Equipments by all employees1 workers shall be ensured.	We provided the PPEs to all our employees/ workers. And its utilization by them is ensured. The PPES photographs are is provided as fig. No. 52 and 53.

Fig.No.52:Personal Protective Equipment's



Fig.No.53:List of Personal Protective Equipments

SANDHYA ORGANIC CHEMICALS PVT. LTD.
 Admin & Sales Office: 101-102, Sangam CHS Ltd., 1st Floor, A Wing, S. V. Road, Santacruz (W), Mumbai - 400054.
 Regd. Office: Tel.: +91-22-61660555 / 26104002 / 26151599 • Fax: +91-22-26104020
 Plot No. 805A/2, II Phase, G.I.D.C. Vapi - 396 195, Gujarat, India.
 Tel.: +91-265-2438875 / 2438225 • Telefax: +91-265-2438875
 E-mail: soc@svrinf.com • Website: www.sandhya-group.com
 (An ISO 9001 : 2008 & ISO 14001 : 2004 Certified Company)

Date: 02.05.2018

List of Personnel Protective Equipment (PPE)

Sr. No.	Item Name
1	Helmet
2	Chemical Filter Mask
3	Dust Mask
4	Gum Boot
5	Safety Shoes
6	Goggles
7	Cotton Hand Gloss
8	Use & Through Hand Gloss
9	Rubber Hand Gloss
10	Cotton Apronne
11	Bubble Hood
12	Safety Belt

For, Sandhya Organic Chemicals Pvt. Ltd.

[Signature]
 Authorized Signatory.

8. 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.

We are given the training about health & safety to our employees from chemicals handling and we do medical checkup of our employees on regular interval. The total 49 employee people in our unit.

At present we have given the training of Fire and safety training and material handling training by aarti industries Ltd. and the training was participated by 4 numbers of workers.

The employees' medical checkup and safety training records are enclosed as **Annexure - II**.

Health & Safety training schedule is provided as fig. No. 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64 and 65.

Fig.No.54: Safety training certificate

Certificate No.: DSH/147/AHL-865906
[Approved by Directorate of Industrial Safety and Health, Gujarat]
[Ref No.: DSH/A-KAYDA/2017/1471 TO 1473, DATE: 08/09/2017]

CERTIFICATE
THIS IS TO CERTIFY THAT

Mr. **RAM KUMAR DAS**
Division - **SANDHYA ORGANIC CHEMICALS PVT. LTD.**
has undergone one full days **Safety & Health Training** programme on covering
(1) Fundamentals of Accidents Prevention and Safety, (2) Importance of Personal Protective Equipments, (3) Permit to Work System-Height Work, Hot Work, LOTO, General Work, Confined space (4) Job Safety Analysis (5) Material Handling
(6) Electrical Safety (7) Fire Fighting and Emergency preparedness (8) House Keeping and Machine guarding (9) BBS
on **16.07.2019**
This Training has been imparted in compliance of **Section 111-A (ii) of The Factory Act 1948**

Yamir - VAPI
Date - 18.07.2019

[Signature]
Authorized Signatory
M/s. Aarti Industries Ltd.

Fig.No.55: Safety training certificate

Certificate No.: DSH/147/AHL-865916
[Approved by Directorate of Industrial Safety and Health, Gujarat]
[Ref No.: DSH/A-KAYDA/2017/1471 TO 1473, DATE: 08/09/2017]

CERTIFICATE
THIS IS TO CERTIFY THAT

Mr. **PARIMAL NAIKA**
Division - **SANDHYA ORGANIC CHEMICALS PVT. LTD.**
has undergone one full days **Safety & Health Training** programme on covering
(1) Fundamentals of Accidents Prevention and Safety, (2) Importance of Personal Protective Equipments, (3) Permit to Work System-Height Work, Hot Work, LOTO, General Work, Confined space (4) Job Safety Analysis (5) Material Handling
(6) Electrical Safety (7) Fire Fighting and Emergency preparedness (8) House Keeping and Machine guarding (9) BBS
on **16.07.2019**
This Training has been imparted in compliance of **Section 111-A (ii) of The Factory Act 1948**

Yamir - VAPI
Date - 18.07.2019

[Signature]
Authorized Signatory
M/s. Aarti Industries Ltd.

Fig.No.56: Safety training certificate

Certificate No.: DSH/147/AHL-865922
[Approved by Directorate of Industrial Safety and Health, Gujarat]
[Ref No.: DSH/A-KAYDA/2017/1471 TO 1473, DATE: 08/09/2017]

CERTIFICATE
THIS IS TO CERTIFY THAT

Mr. **MOTI YADAV**
Division - **SANDHYA ORGANIC CHEMICALS PVT. LTD.**
has undergone one full days **Safety & Health Training** programme on covering
(1) Fundamentals of Accidents Prevention and Safety, (2) Importance of Personal Protective Equipments, (3) Permit to Work System-Height Work, Hot Work, LOTO, General Work, Confined space (4) Job Safety Analysis (5) Material Handling
(6) Electrical Safety (7) Fire Fighting and Emergency preparedness (8) House Keeping and Machine guarding (9) BBS
on **16.07.2019**
This Training has been imparted in compliance of **Section 111-A (ii) of The Factory Act 1948**

Yamir - VAPI
Date - 18.07.2019

[Signature]
Authorized Signatory
M/s. Aarti Industries Ltd.

Fig.No.57: Safety training certificate

Certificate No.: DSH/147/AHL-865922
[Approved by Directorate of Industrial Safety and Health, Gujarat]
[Ref No.: DSH/A-KAYDA/2017/1471 TO 1473, DATE: 08/09/2017]

CERTIFICATE
THIS IS TO CERTIFY THAT

Mr. **MOTI YADAV**
Division - **SANDHYA ORGANIC CHEMICALS PVT. LTD.**
has undergone one full days **Safety & Health Training** programme on covering
(1) Fundamentals of Accidents Prevention and Safety, (2) Importance of Personal Protective Equipments, (3) Permit to Work System-Height Work, Hot Work, LOTO, General Work, Confined space (4) Job Safety Analysis (5) Material Handling
(6) Electrical Safety (7) Fire Fighting and Emergency preparedness (8) House Keeping and Machine guarding (9) BBS
on **16.07.2019**
This Training has been imparted in compliance of **Section 111-A (ii) of The Factory Act 1948**

Yamir - VAPI
Date - 18.07.2019

[Signature]
Authorized Signatory
M/s. Aarti Industries Ltd.

Fig.No.58:Employee Training records

SANDHYA ORGANIC CHEMICALS PVT. LTD.
Training Record and Evaluation
(Format No: F/HRD/03- Rev no: 00 - Issue date: 01/01/18)

Subject of Training : *Handling of plant/area safety training*
Date: 02/01/2019
Time: 10:30 TO 12:30
Trainer : *Tapas Kumar Saker*

Sr. no	Name of Trainee	Signature of Trainee	Effectiveness of training / rating	Evaluation Date	Remarks by Trainer	Signature of Trainer
1	Manoj K. Bano	<i>[Signature]</i>	5	02/01/2019		
2	Arvind Kumar Singh	<i>[Signature]</i>	5	02/01/2019		
3	Arif Durrani	<i>[Signature]</i>	5	02/01/2019		
4	Ramkishan N. Patel	<i>[Signature]</i>	5	02/01/2019		
5	Shikhar Mahesh	<i>[Signature]</i>	5	02/01/2019		
6	Deep Kumar Bano	<i>[Signature]</i>	5	02/01/2019		
7	Kapil Kumar Bano	<i>[Signature]</i>	5	02/01/2019		
8	Deepak Kumar Bano	<i>[Signature]</i>	5	02/01/2019		
9	Shikhar Mahesh	<i>[Signature]</i>	5	02/01/2019		
10	Arvind Kumar Singh	<i>[Signature]</i>	5	02/01/2019		

[Signature]
Signature of Trainer

Fig.No.59:Employee Training records

SANDHYA ORGANIC CHEMICALS PVT. LTD.
Training Record and Evaluation
(Format No: F/HRD/03- Rev no: 00 - Issue date: 01/01/18)

Subject of Training : *Safety Training / Permit to Work / Hot Work / LOTO / General Work / Confined space / House Keeping / BBS*
Date: 26/05/2019
Trainer : *Divyanshu Kumbhar*

Sr. no	Name of Trainee	Signature of Trainee	Remarks by Trainer	Signature of Trainer
1	Manoj K. Bano	<i>[Signature]</i>		
2	Arvind Kumar Singh	<i>[Signature]</i>		
3	Arif Durrani	<i>[Signature]</i>		
4	Ramkishan N. Patel	<i>[Signature]</i>		
5	Shikhar Mahesh	<i>[Signature]</i>		

Prepared By *[Signature]*
Approved By *[Signature]*

Fig.No.60:Employee Training records

SANDHYA ORGANIC CHEMICALS PVT. LTD.
Training Record and Evaluation
(Format No: F/HRD/03- Rev no: 00 - Issue date: 01/01/18)

Subject of Training : *Pollution Control Systems*
Date: 10/06/2019
Trainer : *Divyanshu Kumbhar*

Sr. no	Name of Trainee	Signature of Trainee	Remarks by Trainer	Signature of Trainer
1	Manoj K. Bano	<i>[Signature]</i>		
2	Arvind Kumar Singh	<i>[Signature]</i>		
3	Arif Durrani	<i>[Signature]</i>		
4	Ramkishan N. Patel	<i>[Signature]</i>		

Prepared By *[Signature]*
Approved By *[Signature]*

Fig.No.61:Employee medical Checkup report

Occufit

Dr. Kishan S. Shah
MBBS, DPM, DRC, DRC (S), DRC (T), DRC (H), DRC (A), DRC (C), DRC (E), DRC (F), DRC (G), DRC (I), DRC (J), DRC (K), DRC (L), DRC (M), DRC (N), DRC (O), DRC (P), DRC (Q), DRC (R), DRC (S), DRC (T), DRC (U), DRC (V), DRC (W), DRC (X), DRC (Y), DRC (Z)

Report of Medical Examination: SANDHYA ORGANIC CHEMICALS PVT. LTD. - VAPI

Sl. No.	Name of Employee	Age	Sex	Height	Weight	BP	HR	Temp	Pulse	Respiration	Stethoscope	Abdomen	Genitals	Neurological	Psychiatric	Overall Health
1	Manoj K. Bano	35	M	170	70	120/80	72	37.5	72	18	Clear	Soft	Normal	Normal	Normal	Good
2	Arvind Kumar Singh	32	M	165	65	115/75	68	37.2	68	16	Clear	Soft	Normal	Normal	Normal	Good
3	Arif Durrani	30	M	160	60	110/70	65	37.0	65	15	Clear	Soft	Normal	Normal	Normal	Good
4	Ramkishan N. Patel	33	M	168	68	118/78	70	37.3	70	17	Clear	Soft	Normal	Normal	Normal	Good
5	Shikhar Mahesh	31	M	162	62	112/72	67	37.1	67	16	Clear	Soft	Normal	Normal	Normal	Good

Dr. Kishan S. Shah
MBBS, DPM, DRC, DRC (S), DRC (T), DRC (H), DRC (A), DRC (C), DRC (E), DRC (F), DRC (G), DRC (I), DRC (J), DRC (K), DRC (L), DRC (M), DRC (N), DRC (O), DRC (P), DRC (Q), DRC (R), DRC (S), DRC (T), DRC (U), DRC (V), DRC (W), DRC (X), DRC (Y), DRC (Z)

Fig.No.62:Employee medical Checkup report

Occufitt Dr. Ketan S. Desai
M.B.B.S., AFIH
Consulting Industrial Physician

MEDICAL CHECKUP REPORT

Name of Industry : SANDHYA ORG. CHEMICALS PVT. LTD. UR Sr.No.: 21 DE 02-Oct-2019
Name : (SANDHEEP G PATEL) Emp. Code: 21
Department : (Production) Age: 33 yrs Sex: Male

Present Complaints : Nil

Personal History : Nothing particular
Family History : Nothing particular
Habit : Nil
Allergy : Not known

Occupational exposure : Furnace, manual handling

Height : 167 cms Chest : 90/91 cms Waist : 81 cms BMI : 23.08 (Normal 19 to 25)
Weight : 66.9 Kgs. (normal expanded) Hgt : 87 cms Waist/Hgt : 0.93 (N upto 0.95)
Lymph nodes : Not palpable Venous pulse : Absent
Oral hygiene : Good

Cardio-vascular system :
Pulse : 72 per min. B.P. : 120/70 mm of Hg. Heart sounds : Normal
Others : Nil

Respiratory system :
Respiratory sounds : Normal Others : Nil

Abdominal system :
Liver : Not palpable Spleen : Not palpable Tenderness : Absent
Central nervous system :
Reflexes : Normal Jerks : Normal Others : Nil
Orientation to time / Place / Person / Circumstances : NAD
Musculo-skeletal system :
Physical deformity : Nil Tenderness : Absent

Ear-nose-throat : NAD
Genito-urinary system : NAD Hydrocele : Absent
Skin : Normal
Other Findings : Page 1 of 3

Fig.No.63:Employee medical Checkup report

Occufitt Dr. Ketan S. Desai
M.B.B.S., AFIH
Consulting Industrial Physician

MEDICAL CHECKUP REPORT

Name of Industry : SANDHYA ORG. CHEMICALS PVT. LTD. UR Sr.No.: 21 DE 02-Oct-2019
Name : (SANDHEEP G PATEL) Emp. Code: 21
Department : (Production) Age: 33 yrs Sex: Male

LABORATORY INVESTIGATIONS

Hematology :
Total R.B.C. Count : 5.80 million/mm³ Reference Range : 4.5-5.5 million/mm³
Hemoglobin : 12.5 g/dl Reference Range : 13-16 g/dl (M) 12-14 g/dl (F)
Total W.B.C. Count : 10200 /mm³ Reference Range : 5000-10000/mm³

Microscopic count :
RBC : 78 %
WBC : 20 %
Platelets : 01 %
ESR : 01 %
Reticulocyte : 330000 /mm³

Physical examination :
Color : Pale yellow
Quantity received : 10 ml
Specific gravity : 1.020
Chemical Examination :
Albumin : Trace
Bile salts : Absent
Bile pigments : Absent
Urobilinogen : Normal
Ketone bodies : Absent

Microscopic Examination :
Epithelial cells : 2-3 H. P. F.
Flat cells : 2-4 H. P. F.
Red blood cells : 0-1 H. P. F.
Other Test : Blood sugar (F): 72 mg/dl B. Cholesterol: 142 mg/dl

Blood Group : A Positive

FORNICATION
125-A, Saragpur Road,
First Gate, Aul-356 020, Varad,
Page 2 of 3

Fig.No.64:Employee medical Checkup report

Occufitt Dr. Ketan S. Desai
M.B.B.S., AFIH
Consulting Industrial Physician

MEDICAL CHECKUP REPORT

Name of Industry : SANDHYA ORG. CHEMICALS PVT. LTD. UR Sr.No.: 21 DE 02-Oct-2019
Name : (SANDHEEP G PATEL) Emp. Code: 21
Department : (Production) Age: 33 yrs Sex: Male

X-Ray : Not done

Autism : Not done

Pulmonary Function Test : Normal spirometry

ECG : Not done

Observations : Nil

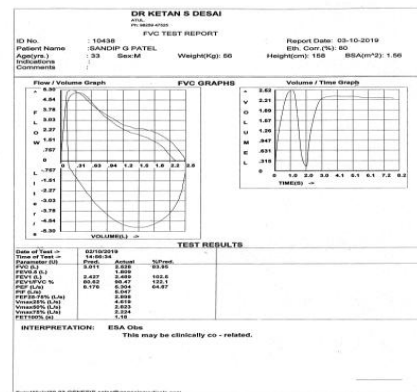
Occupational : Nil
Disease : Nil

Employee is free from any contagious disease and is fit to work in plant / office.
Advice : Nil

DR. KETAN S. DESAI
M.B.B.S., AFIH

Page 2 of 3

Fig.No.65:Employee medical Checkup report



- | | | |
|----|--|--|
| 9. | <p>The company shall also comply with all the environmental protection measures and safeguards proposed in the project report submitted to the Ministry.</p> <p>All the recommendations made in the EINEMP in respect of environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.</p> | <ul style="list-style-type: none"> • We do comply with the environmental protection measures and safeguards as proposed in the documents submitted to the Ministry. • Risk mitigation measures relating to the project are also taken care of and are implemented. • Since the project site is located within Notified industrial area of GIDC Vapi; public hearing was exempted to the unit. • We are involved in community developmental measures as well as social welfare measures in our project area for the overall improvement of the environment. |
|----|--|--|

Recommendations made in the EIA/EMP in respect of environmental management

- | | |
|--|---|
| <p>➤ Air pollution Control</p> <ul style="list-style-type: none"> • We have provided Stack height of 11m attached to D.G. Set for dispersion of gaseous emissions. • We have provided adequate stack height @ 11 m from the ground level for effective dispersion of flue gaseous during boiler operations. • We have installed scrubbing system to control these fugitive emissions. • We have provided automated closed | <p>➤ Water & wastewater</p> <ul style="list-style-type: none"> • Domestic waste water generated is disposed off through septic tank into soak pit. <p>➤ Noise</p> <ul style="list-style-type: none"> • Acoustic enclosure is provided to abet noise pollution during operation of D.G. Set. • We regularly monitor noise level within the premises through NABL accredited laboratory. • We provided the PPEs to all our employees/workers. And its utilization by them is ensured. |
|--|---|

	system for handling and transfer of chemicals.	
	<p>➤ <u>Hazardous Materials</u></p> <ul style="list-style-type: none"> • We have installed the closed system for handling & transfer of Chemicals/materials. • All the materials are identified as hazardous as per MSIHC Rules (2000). • Firefighting systems are provided in storage area and maintained, to cope with emergency, in case of any fire accident occurring in the premises. Total 13 Nos. of fire extinguishers (DCP/CO2) are installed within the company premises. <p>➤ <u>Occupational Health & Safety</u></p> <ul style="list-style-type: none"> • We are given the training about health & safety to our employees from chemicals handling and we do medical checkup of our employees on regular interval. • Occupational health surveillance of the workers is done on a regular basis and the records (of medical examination report) are maintained as per the Factories Act. 	<p>➤ <u>Greenbelt Development</u></p> <ul style="list-style-type: none"> • Greenbelt has been developed as per the guidelines of CPCB, under the supervision of experienced personnel and guidance of local experts. The company has developed greenbelt in about 1785 sq. m. land out of total land of 5336 sq. m. <p>➤ <u>Socioeconomic & CSR Activities.</u></p> <ul style="list-style-type: none"> • We are involved in the CSR activities as mentioned in CSR plan for improving the socio-economic condition of the surrounding area and we are also involving local villages and administration for implementing social development plans. • The detail of CSR activity is enclosed as Annexure-IV. • We are involved in eco-developmental measures as well as community welfare measures in our project area.
	<p>➤ <u>Risk Assessment & Safety Measures</u> Critical Safety Measures</p> <ul style="list-style-type: none"> • We have provided Fire hydrant & Fire detection system within process unit 	<p>➤ <u>Safety Measures for Handling</u></p> <ul style="list-style-type: none"> • Display Boards is provided on all storage tanks which includes the name of the product, stored Material of construction, Calibration of tanks and date of Painting. • In order to avoid the accident due to spillage or overflow is provide the level indicators which helps to know the exact liquid level inside the tank. • All the storage tanks is provided with transferring pumps which helps to reduce the risk of tank leakages.
10.	The company shall undertake CSR activities and all relevant measures for improving the socio-economic conditions of the surrounding area.	<p>We are involved in the CSR activities as mentioned in CSR plan for improving the socio-economic condition of the surrounding area and we are also involving local villages and administration for implementing social development plans.</p> <p>The CSR Activity photographs are provided in conditionno.21 as fig. No. 30, 31, 32, 33, 34 and 35.</p> <p>The detail of CSR activity is enclosed as Annexure-IV.</p> <p>The details of activities undertaken & financial details for same areas provided in the Table no.6 mention below:</p> <p>Contribution to:</p>

Table No.6:CSR Chart

Sr. No.	CSR Expenses	Amount Paid in Rs. (For the year 2017-2018)
1.	Local School	5.0 ac
2.	Smasanbhumi	11.00 Lac
3.	Cricket Tournament	50,000
4.	Arrangement for blood donation camp.	20,000
5.	Arrangement for Eye camp.	25,000
6.	Development of Maroli Circle	15.00 Lac
7.	Barricade for traffic control	15,000
	Total	32,10,000

11.	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	We are involved in eco-developmental measures as well as community welfare measures in our project area for the overall improvement of the environment. The measures undertaken as per above point no.-10.
12.	A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	<p>We have established Environmental Management Cell, and permanently appointed plant-in-charge, environmental manager, operators and chemist with qualification and training in the relevant field.</p> <p>In-house laboratory has also been set to carry out the monitoring of basic parameters.</p> <p>And also have contracted with MoEF&CC recognized laboratory for conducting the monitoring of other parameters.</p> <p>The Environmental management cell is provided as fig.no.69.</p> <p>The Environmental Engineer appointment letter is provided as fig.no.66.</p> <p>The Environmental Engineer appointment letter is provided as fig.no.67.</p>

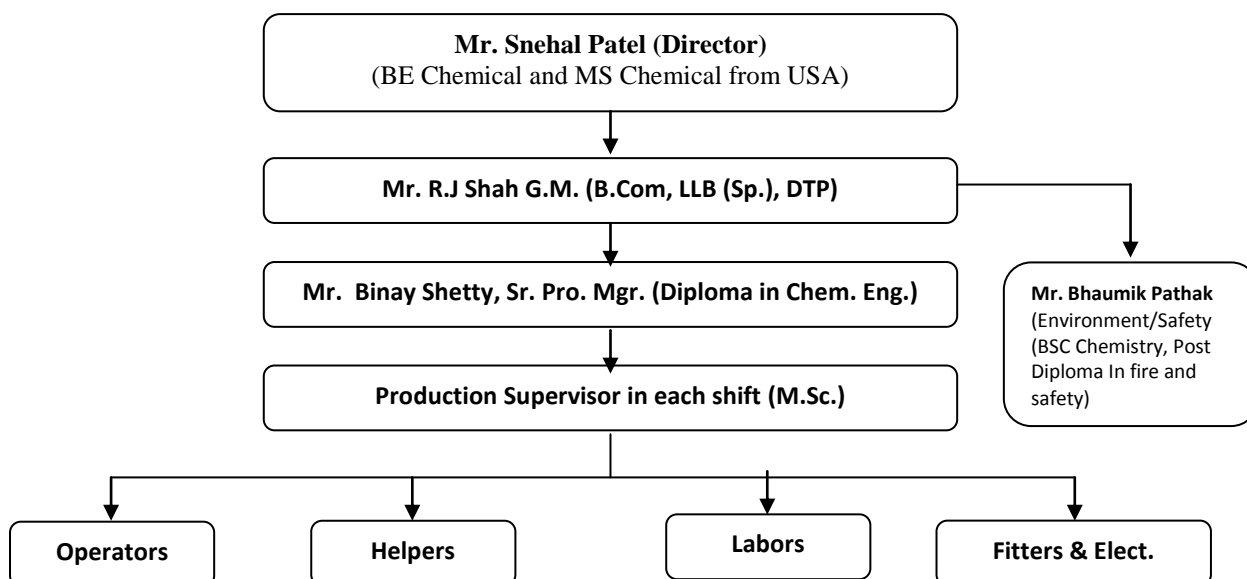
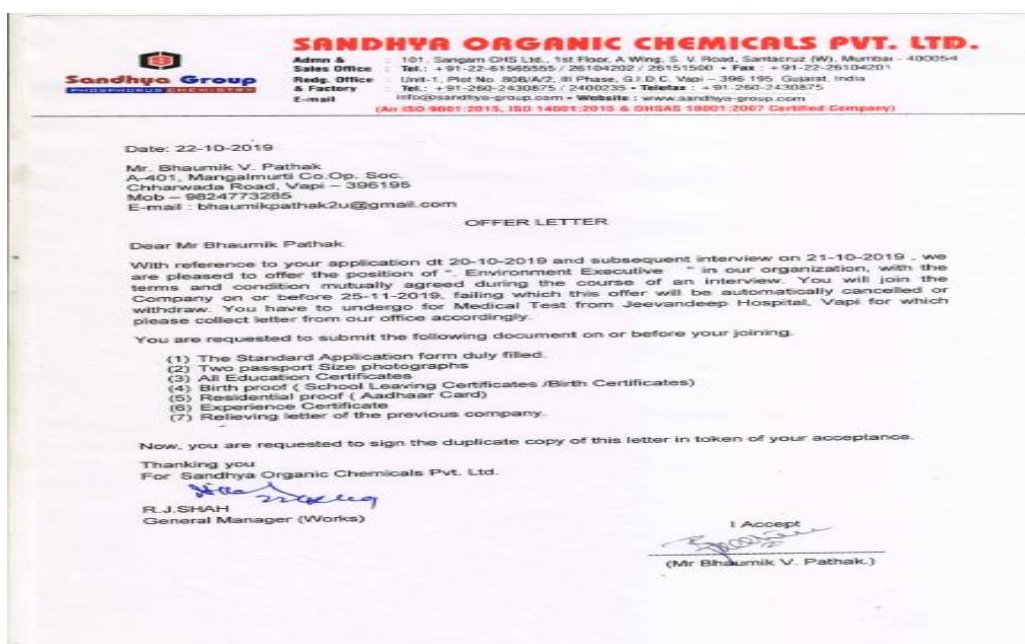
Fig.No.66: Environmental Management Cell

Fig.No.67: Environmental Engineer Appointment Letter



13.	The company shall earmark sufficient funds for recurring cost per annum to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management pollution control measures shall not be diverted for any other purpose.	We have secured funds (i.e. Rs. 40.00 Lakhs) for capital investment and Rs. 30.00 Lakhs/Annum as recurring cost to implement and maintain the conditions stipulated by the Ministry of Environment & Forests as well as the State Government. As on March 2019 the recurring cost of EMS is 9.56 Lakhs/Annum. The Actual expenses are provided in the tale no.7 mention below:
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Table No.7:EMS

Capital Cost		
Sr. No.	Particulars	(Rs. In Lakhs)
1.	Pollution Control (ETP & APC)	30.00
2.	Safety & Occupational Health	
3.	Greenbelt Development	
EMS capital expense (actual)		
Sr. No.	Particulars	(Rs. In Lakhs)
1	Environmental Protection measures	40.00
TOTAL		40.00
Recurring Cost/Annum (year-2017-18)		
1	Environment & Safety Management System	5.35
2	Greenbelt Maintenance	2.00
3	Environment Monitoring expenses	
	Air Monitoring	0.54
	Stack Monitoring	0.79
	Noise Monitoring	0.28
4	Health Checkup expenses	0.60
TOTAL		9.56

14.	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parisad/Municipal Corporation, Urban local Body and the local NGO, if any, from who	A copy of the environment clearance letter has been sent by the project proponent to concerned Panchayat, Zila Parisad/ Municipal Corporation and Urban local Body.
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The EC letter submission Acknowledge copy is provided as fig.no.68.

[illegible]

We are regularly submitting Comprehensive EC compliance report for the period of April to September and October to March to the Ministry's regional office at Bhopal well within the stipulated date.

1. Period of April'17 to Sept'17, Date: 29.11.2017.
2. Period of October'17 to March'18, Date: 25.05.2018.
3. Period of April'18 to Sept'18, Date: 26.12.2018.
4. Period of October'18 to March'19, Date: 22.05.2019.


Fig.No.70: EC Compliance Submission Ackw. copy

SANDHYA ORGANIC CHEMICALS PVT. LTD.
Head Office : 40, Narayan Avenue, New Market, Bangalore - 560018
Branch Office : 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834

Fig.No.71: EC Compliance Submission Ackw. copy

(Handwritten: 08/09/2016)

SANDHYA ORGANIC CHEMICALS PVT. LTD.

 **Sandhya Group**
INDUSTRIAL ZONE

Sales Office: 7-37, 1st Floor, Sengam Hills Rd., 1st Floor E.A. & V. Road, Sengam Hills, Madurai - 625004
Sales Office: 1-31, 2nd & 3rd Floors / 701A/202B / 20118500 - Panaji - 851-29-29 (Goa)
Regd. Office: 1-31, 2nd & 3rd Floors / 701A/202B / 20118500 - Panaji - 851-29-29 (Goa)
Tel: +91-260 23675 / 2400235 - Madurai - 181-260-23675
E-mail: sales@sandhyagroup.com www.sandhyagroup.com
(An ISO 9001:2008 & ISO 14001:2004 Certified Company)

Date: 26/12/2018
To,
The Director (S)
Ministry of Environment and Forests,
Regional Office (Western Region),
"Kendriya Parayavan Bhawan",
Link Road No.3E-S, East Shikhar Nagar
Gurgaon – 602 016 (H.P.)



Subj: Submission of EC compliance report for Expansion of Synthetics Organic Chemicals manufacturing Unit at Plot No. R08 A/2, 3rd phase, GIDC, Vad. Dist., Valad-Village (Ongem) manufacturing Plantation (Rode-metals), Aluminium Phosphide (25 to 100 MT/MPO), By M/s Sandhya Organics Chemicals Pvt. Ltd.

Ref: E.C.No. 1-1101/1481/2011-A-II (H. Ct. dt.25/06/2015)

Dear Sir,
As per the EIA Notification-2006 and your above referred letter, we are submitting the under mentioned information as required.

1. We completed our proposed expansion and started production accordingly.
2. Point wise compliance status to various stipulations laid down by Ministry in its letter with supporting reports and reports are enclosed. Also a copy of half yearly compliance report (from April 2018 to September 18) is included in CD. We shall submit the half yearly compliance report time to time
3. Copies of consent to operate under Water Act-1974 and Air Act-1981, and Authorization under Hazardous Waste Rules from the State Pollution Control Board (GPCB) are enclosed for your kind consideration.

We hope that above and enclosed information are as per the requirements and if any further information to be provided I kindly inform you at your earliest.

Thanking you,
Yours truly,

For Sandhya Organic Chemicals Pvt. Ltd.


R.J.S. Shah
(General Manager -Works).

Encl.: As/a




Fig. No.72: EC Compliance Submission Ackw. copy







 Sandhya Group <small>INDUSTRIAL CHEMICALS</small>		SANDHYA ORGANIC CHEMICALS PVT. LTD. <small>ACIS 0071</small>	
Address & Sales Office: 101-102, Sangam Circle Ltd., 1st Floor, A Wing, S. V. Road, Sarabnagar (P), Mumbai - 400054 Tel. : +91-22-6160605 / 20194007 / 20151500 • Fax : +91-22-20194007 Head Office: Plot No. 808/A/2, B Phase, G.I.D. Estate - 389 105, Gujarat, India. Tel. : +91-79-2400871 / 2400875 • Satellite : +91-79-2400876 E-mail: soc@sandhya-group.com • www.sandhya-group.com (An ISO 9001:2008 & ISO 14001:2004 Certified Company)		EXPORT/IMPORT DEPARTMENTS 901/902, E-2, CHOWK Gachar Bazar, D-7, D-2, D-3, D-4, D-5 LAFITEZ 24A, BHTSO, SARABNAGAR FERNET-BRILL, Sarabnagar 38 Freezone, Mumbai-400017 CHOWK Anand, Gandhinagar, B-80 Anand, S. V. Road, Sarabnagar, 38	
Date: 26/12/2018 To: The Zonal Officer (S) Central Pollution Control Board, Zonal Office, "Parvati Bhawan", opp. VMC, Ward office No.16, Subhanspur, Vadodra - 390 023.		 	
Subj: Submission of EIA compliance report for Expansion of Synthesia Organic Chemicals manufacturing Unit at Plot No. 808/A/2, 3rd phase, GIDEC, Vad. Dist.-Vadrad (Gujarat) manufacturing Petesticides (Rendonec, Aldrinophosphor) (2 to 100 MT/MP), By M/s. Sandhya Organic Chemicals Pvt. Ltd.			
Ref: EC Letter No. J-1101/1481/2011-IA-I (U) dt. 25/06/2013			
Dear Sir, As per the EIA Notification-2006 and your above referred letter, we are submitting the under-mentioned information as requested.			
<ol style="list-style-type: none"> 1. We completed the proposed expansion and started production accordingly. 2. Point wise compliance status to various stipulations as laid down by Ministry in its letter with supporting and reports are enclosed. Also a soft copy of half yearly compliance report (from April 2018 to September 2018) is enclosed in CD. We shall submit the half yearly compliance report to time to time. 3. Copies of consent to operate under Water Act-1974 and Air Act-1981, and Authorization under Hazardous Waste Rules from the State Pollution Control Board (CPCB) are enclosed for your kind consideration. 			
We hope that above and enclosed information is as per the requirements and if any further information to be provided kindly inform us at your earliest.			
Thanking you, Yours truly, For Sandhya Organic Chemicals Pvt. Ltd.   R. J. Shah (General Manager, Vadodra)			
Encl. : As above			

Fig.No.73: EC Compliance Submission Ackw. copy



Sandhya Group
of Industries

SANDHYA ORGANIC CHEMICALS PVT. LTD.

(Formerly Sandhya Chemicals Pvt. Ltd.)

Head Office:
Plot No. 9/20/2, B.P. Road, A-11, 4th Floor, Sandhya Industrial Estate - 680004
Tel. : + 91 9521645550 / 9521645551 / 24871000 • Fax : + 91 9521642821
E-mail : info@sandhya.org • hr@sandhya.org • procurement@sandhya.org

Branch Office:
Plot No. 9/20/2, B.P. Road, A-11, 4th Floor, Sandhya Industrial Estate - 680004
Tel. : + 91 95202773 / 24820273 • Fax : + 91 95202787
E-mail : branch@sandhya.org • hr@sandhya.org • procurement@sandhya.org

Branch Office:
Plot No. 9/20/2, B.P. Road, A-11, 4th Floor, Sandhya Industrial Estate - 680004
Tel. : + 91 95202773 / 24820273 • Fax : + 91 95202787
E-mail : branch@sandhya.org • hr@sandhya.org • procurement@sandhya.org

Branch Office:
Plot No. 9/20/2, B.P. Road, A-11, 4th Floor, Sandhya Industrial Estate - 680004
Tel. : + 91 95202773 / 24820273 • Fax : + 91 95202787
E-mail : branch@sandhya.org • hr@sandhya.org • procurement@sandhya.org

Branch Office:
Plot No. 9/20/2, B.P. Road, A-11, 4th Floor, Sandhya Industrial Estate - 680004
Tel. : + 91 95202773 / 24820273 • Fax : + 91 95202787
E-mail : branch@sandhya.org • hr@sandhya.org • procurement@sandhya.org

Fig.No.74: EC Compliance Submission Ackw. copy

ACH C8H₈

SANDHYA ORGANIC CHEMICALS PVT. LTD.

Address : 101-102, Sankar CHS LBS, 10 Floor, A Wing, S. V. Patel Industrial Road, Marol - 400074
Mumbai - 400 029 | 2610 14071 | 2610 1510 | Fax : +91 22 2601 94201

Regd. Office : Plot No. 808/A2, Phase (I), D.C. Park, 390 - 390 190, Gandhinagar, Distt. Navi Mumbai - 404 005 | 2534 977 | 2400 025 | Fax : +91 22 2601 94201

E-mail : soci@psnl.com • Website : www.sandhya-group.com

Director General of Chemicals

Date: 22/05/2019

To,
The Joint officer (S)
Central Pollution Control Board,
Joint Officer,
"Parvathi Bhavan", opp. VMNC Ward office No.10,
Subhashnagar – 390 023,

Sub: Submission of EC compliance report for Equinoxyl® Organic Chemicals manufacturing Unit at Plot No. 808 A/2, 3rd phase, GDPC, Vadod - District (Gujarat) manufacturing Pesticides (Rohmercidates), Aluminium Phosphide (25 to 100 MT/MO). By M/s. Sandhya Organic Chemicals Pvt. Ltd.

Ref: EC Letter No.: J1-10111481-1(1)-A.I. (1) dt. 25/06/2015

Dear Sir,

As per the EIA Notification-2006 and your above referenced letter, we are submitting the under mentioned information as required.

1. Point wise compliance status to various stipulations as laid down by Ministry in its letter dated 25/06/2015 regarding EC compliance is enclosed. Also a soft copy of half yearly compliance report (from October 2018 to March 2019) is also sent. As CD, We shall submit the half yearly compliance report upto time period from April 2019 to March 2020.

2. Copies of consent to operate under Water Act-1974 and Air Act-1981, and Authorization under Hazardous Waste Rules from State Pollution Control Board (GPCB) are enclosed for your kind consideration.

We hope that above and enclosed information are as per the requirements and if any further information to be provided kindly inform us at your earliest.

Thanking you,
Yours truly,

For Sandhya Organic Chemicals Pvt. Ltd.,

R. J. Shah
(General Manager - Works).

Encl.: As above.

16.

The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the Gujarat Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the Bhopal Regional Offices of MoEF by email.

We are regularly submitting the environmental statement for each financial year ending 31st March in Form-V to the Gujarat pollution control committee.

A acknowledge copy of the Form - V submission to GPCB is enclosed herewith as **Annexure: - VI.**
A acknowledge copy of the Form – V is provided as fig.no.75.

Fig.No.75: Acknowledge Copy of Form-V

SANDHYA ORGANIC CHEMICALS PVT. LTD.

Hand Address: 107-108, Sagarpet Road, 1st Floor & 2nd Fl., V.P. Road, Indraprastha Colony, Madurai - 625004
Tel: +91 456 2264971 / 4000001 / 4000002 / 4000003 / Fax: +91 456 2264972

E-mail: info@sandhyaorganic.com Website : www.sandhya-organic.com
so regd no: 2008 A 0014899 - 2008 Certified Company

PCB No: PA485
Date: May 1, 2019

To,
The Regional Officer,
Central Pollution Control Board,
New Delhi

Sch./ Submission of Environmental Statement (Form – V) for the year 2018 – 2019.

Dear Sir,



I am submitting Environmental Statement duly filled in prescribed Form – V with all relevant details for the year 2018 – 2019.

I thank you and assuring you our best on ongoing efforts.

Sincerely yours,
For Sandhya Organic Chemicals Pvt. Ltd.

(Authorized signatory)

Enclosures:
1. Report - V

17.	<p>The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://envfor.nic.in. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and-a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.</p>	<p>We have already informed to the public by local news paper that we have accorded environmental clearance by the Ministry and copies of clearance letter are available with the state Pollutions Control Board and may also be seen at website of the Ministry of Environmental and Forests at website of the Ministry of Environmental and Forests at http://envfor.nic.in. The advertisement (Public notice) has been made within 7 days of obtaining environment clearance. A copy of public notice in newspaper Sandesh dated 29 June 2015 is enclosed herewith as Annexure:-VIII. The public notice is provided as fig.no.76 and 77.</p>
	<p align="center">Fig.No.76:Sandesh.dt.30.07.2015.</p> 	<p align="center">Fig.No.77:Sandesh.dt.29.07.2015.</p> 
18.	<p>The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.</p>	<p>The project is self-finance by the promoters hence no financial approval from the financial authorities was required. , hence financial closure is not applicable.</p> <ul style="list-style-type: none"> • Date of final Approval of the project – E.C. LETTER NO J-11011/481/2011-IA.II (I) dt. 25/06/2015. • Date of start of the Project – Consent Order No.: AWH-63833, Date of issue:31/07/2014

For **Sandhya Organic Chemicals PVT. LTD.**

(Authorized Signature)

List of Annexure

No. of Annexure	Name of Annexure
I.	Ambient air Quality, Stack monitoring, Work Place monitoring report of six month (April 2019 to September 2019)
II.	Copy of Health check-up reports and training records.
III.	Green belt photos
IV.	CSR Activity details
V.	The membership certificate of TSDF site of Ms. VWEMCL.
VI.	Form-V
VII.	Public Notice
VIII.	Site Layout Plan
IX.	Consolidated consent & authorization compliance
X.	MoEF Data Sheet
XI.	Last Six Month Production Data
XII.	Last 3 Years show cause notice and its reply
XIII.	Reply of MoEF officer visit additional observations and present status

Monitoring the Implementation of Environmental Safeguards
Ministry of Environment & Forest
Western Region, Regional Officer, Bhopal

MONITORING REPORT

PART – I
DATA SHEET

1.	Project type: River – valley/ Mining/ Industry/ Thermal/ Nuclear/ Others (specify)	:	Industry				
2.	Name of the project	:	M/s. Sandhya Organic Chemicals Pvt. Ltd.				
3.	Clearance letter (s) / OM No. and date	:	No. J-11011/481/2011-IA.II (I) date: 25/06/2015				
4.	Location a) District (s) b) State (s) c) Location Latitude / Longitude	: : : :	Valsad, Gujarat <table border="1" style="margin-left: auto; margin-right: auto;"><tr><th>Longitude</th><th>Latitude</th></tr><tr><td>72°55'37.61"</td><td>20°22'43.47"</td></tr></table>	Longitude	Latitude	72°55'37.61"	20°22'43.47"
Longitude	Latitude						
72°55'37.61"	20°22'43.47"						
5.	Address for Correspondence a) Address of the Concerned Chief Engineer (with Pin Code & Mob. No./Telephone/ Telefax/E-mail) b) Address of the Concerned Project Engineer (with Pin Code & Mob. No. /Telephone/ Telexfax/ E-mail)	: : :	Mr. Kantilal M Koli Plot. No. 203 & 204, Residential Bunglow area, Saurabh Society, GIDC Vapi, Dist: Valsad. Mo No: 09725260270				
6.	Salient Features a) of the Project b) of the Environment Management Plant	: :	Enclosed As Annexure-I Enclosed As Annexure-II				
7.	Break up of the Project Area a) Submergence area : Forest & Non-Forest b) Others	: :	-- Enclosed As Annexure-III				
8.	Break up of the project affected population with enumeration of those losing Houses / Dwelling units only, Agricultural Land, Both Dwelling Unit & Agricultural Land & Landless Laborers / Artisans: a) SC, ST / Adivasi b) Others (Please indicate whether these figures are based on any scientific and systematic survey carried out give details and year of survey)	: : :	Not Applicable Not Applicable Not Applicable				
9.	Financial Details : a) Project Cost as originally revised	:	Pls. refer Annexure III				

	<p>estimates and the year of price reference</p> <p>b) Allocation made for environmental management plans with item wise and year wise break-up</p> <p>c) Benefit cost ratio/internal rate of Return and the year of assessment (if applicable)</p> <p>d) Whether above includes the cost of environmental management as shown in the above.</p> <p>e) Actual expenditure incurred on the project so far.</p> <p>f) Actual expenditure incurred on the environmental management plan so far</p>	:	:	:	:	:	:
10.	<p>Forest Land Requirement</p> <p>a) The status of approval for diversion of forest land for non-forestry use</p> <p>b) The status of clearing felling</p> <p>c) The status of compensatory afforestation, if any</p> <p>d) Comments on the viability & sustainability of compensatory afforestation program in the light of actual field experience so far</p>	:	:	:	:	:	<p>The unit is located in Vapi GIDC.</p> <p>The unit is located in Vapi GIDC.</p> <p>The unit is located in Vapi GIDC.</p>
11.	The Status of Clear Felling in non-forest areas (Such as submergence area or reservoir, approach Roads.), if any with quantitative information.	:	:	:	:	:	The unit is located in Vapi GIDC.
12.	<p>Status of Construction</p> <p>a) Date of Commencement (Actual & / or planned)</p> <p>b) Date of Completion (Actual & / or planned)</p>	:	:	:	:	:	<ul style="list-style-type: none"> Date of final Approval of the project – E.C. LETTER NO J-11011/481/2011-IA.II (I) dt. 25/06/2015. Date of start of the Project – Consent Order No.: AWH-63833, Date of issue:31/07/2014
13.	Reason for the delay if the project is yet to start.	:	:	:	:	:	None
14.	<p>Dates of Site Visit</p> <p>a) The dates on which the project was monitored by the Regional Officer on previous occasions, if any</p> <p>b) Date of site visits for this monitoring report</p>	:	:	:	:	:	<p>MoEF&CC Regional office, Bhopal visited the site on 19-10-2019.</p> <p>--</p>
15.	<p>Details of correspondence with project authorities for obtaining action plans/information on status of compliance to safeguards other than the routine letters for logistic support for site visit.</p> <p>(The first monitoring report may contain the details of all the letters issued so far but the later reports may cover only the letters issued subsequently)</p>	:	:	:	:	:	<p>MoEF&CC Regional office, Bhopal visited the site on 19-10-2019.</p> <p>The additional observations and present status with adequate reasoning and supporting data is enclosed as EC compliance Annexure No-XIII.</p>

Annexure I

SAILANT FEATURES OF THE PROJECT AND ENVIRONMENT MANAGEMENT PLAN

Name of the Project : M/s. Sandhya Organic Chemicals Pvt. Ltd.

Location : Plot. No. 808 A/2, 3rd Phase,
GIDC Estate, Vapi -396 195
Dist: Valsad (Gujarat).

Project

- ⇒ M/s. Sandhya Organic Chemicals Pvt. Ltd. falling under Small Scale category manufacture “Pesticides(Rodenticides) compound” at Plot No. 808 A/2, 3rd Phase, GIDC Estate, Vapi- 396 195, Dist- Valsad (Gujarat).
- ⇒ Sandhya Organic Chemicals Pvt. Ltd. is located in GIDC notified industrial area falling under Small Scale category manufacturing Pesticides (Rodenticides) – Aluminium Phosphide and Zinc Phosphide for which the company had obtained CC&A from Gujarat pollution Control Board. Now the company proposes to enhance the production capacity of the existing products under the category “Pesticide (Rodenticides) Products” from 50MT/M to 200MT/M.
- ⇒ The company needs to get the Environmental Clearance from Ministry of Environment and Forest prior to commissioning of the proposed expansion project. The proposed expansion project involves the production of “Pesticide (Rodenticide) Compounds” which falls under item no. 5(b) – Pesticides Industry and intermediates (Category A) as per the EIA notification- 2006 (as amended).

Project Proponent

- ⇒ The company is a registered Private Limited company and is promoted by four Directors.

Sr.No.	Name of Proprietor	Residential Address
1.	Mr. Kantilal M Koli	Plot. No. 203 & 204, Residential Bunglow area, Saurabh Society, GIDC Vapi, Di; Valsad.
2.	Mrs. Sandhyaben K koli	
3.	Mr. Smit K Patel	
4.	Mr. Snehal K Patel	

- ⇒ Small Scale Unit

LIST OF PRODUCTS (MT / MONTH)

Sr. No.	Name of Products	Existing Quantity (MT/M)	Proposed Quantity (MT/M)	Total Quantity after expansion (MT/M)
1.	Aluminium Phosphide	25	75	100
2.	Zinc Phosphide	25	75	100
Name of by-products				
1	Phosphoric Acid (15 %)	25	75	100

The following are the salient features of the proposed expansion project :

Capacity of Manufacturing Plant	:	Existing : 50 MT / month After Proposed : 100 MT / month
By Products	:	Phosphoric Acid (15%)
Area Required	:	5336.64 m ²
Green Belt Area	:	Existing: 432 m ² Proposed: 0 Total area after proposed expansion: 432 m ²
Man Power Required	:	Existing: 32 Persons Proposed: 67 Persons
Water Requirement	:	Existing: 9.4 KL/D Domestic: 5.0 KL/D Industrial: 4.4 KL/D Proposed Additional: 10.6 KL/D Domestic: 0.5 KL/D Industrial: 10.1 KL/D
Effluent Generation	:	5.5 m ³ / day (Industrial) 4.0 m ³ / day (Domestic)
Disposal of Treated Effluent	:	<input type="checkbox"/> Used Oil: Disposal by selling to registered recyclers. <input type="checkbox"/> Discarded Containers: After decontamination will be sold to re-conditioners.
Source of Water Supply	:	GIDC supply Dept.
Air Pollution Control Measures	:	Existing Scenario: Steam Boiler Capacity : 300 Kg/Hr · PM <150 mg/Nm ³ · SO ₂ < 100 ppm · NO _x < 50 ppm D.G. Set Capacity: 125 KVA · PM <150 mg/Nm ³ · SO ₂ < 100 ppm · NO _x < 50 ppm
	:	Proposed Scenario: Steam Boiler Capacity: 300 Kg/Hr (stand-by) · PM <150 mg/Nm ³ · SO ₂ < 100 ppm · NO _x < 50 ppm D.G. Set Capacity: 125 KVA · PM <150 mg/Nm ³ · SO ₂ < 100 ppm · NO _x < 50 ppm Steam Boiler Capacity : 600 Kg/Hr · PM <150 mg/Nm ³ · SO ₂ < 100 ppm

		· NOx < 50 ppm
Fuel Requirement	:	Existing Scenario: Natural Gas - 66.66 SCMD HSD - 16 LPH Proposed Scenario: Natural Gas - 350 SCMD HSD - 16 LPH
Environmental protection measures	:	Rs. 40 Lakhs

Air Emission Control

There are flue gas emission emitted from the stack attached to boiler, thermopak & spray dryer. The other source of flue gas emission will be from the D. G. Set. However, it will be in operation only during emergency. The fuel currently used in the boiler, hot air generator & thermopak is Natural Gas. Hence, there will not be any air pollution control system for the same. However, for process stacks, scrubbers & carbon adsorber shall be provided for gaseous emission control of SO₂ & vapour of formaldehyde. The Company has proposed to install a stack of 11 m height to disperse flue gas emissions. Chimney height has been so chosen as to effectively disperse the generated pollutants, though in small quantity, effectively and ensures that the ground level concentrations of pollutants in the surrounding environment remain well within the permissible limits.

- Flue gas :Chimney of adequate height
- APC not required as natural gas is used.
- Process: Acid followed by alkali scrubber, carbon adsorption system.

Hazardous Waste Management

Sr. No.	Types of Waste	Quantity (MT/Year)	Packing	Storage Area In m ²	Treatment	Method of Disposal
1.	Used oil (5.1)	0.040	Drum	2	Storage & disposal	Sell to registered rerefiner
2.	Discarded containers (33.3)	30	Stack on pellets	5	Washing & sell	Utilized for packing of hazardous waste or sell to authorized recycler
3.	Used filter clothes (35.1)	1.0	drum	5	Washing & disposal	Dispose off into TSDF, Vapi
4.	Sludge from wet scrubber (36.1)	0.024	drum	2	Storage & disposal	Dispose off into TSDF, Vapi
5.	Waste from ETP (34.3)	3	Bags	10	Storage & disposal	Dispose off into TSDF, Vapi
6.	Gypsum waste from the process of Naphthalene Based (Powder)(26.1)	1428	Bags	50	Storage, sell or disposal	Sell to cement industries or Dispose off into TSDF,Vapi
7.	used carbon from carbon absorber	0.1	bags	1	Storage & disposal	Dispose off into TSDF, Vapi

Annexure - II

ENVIRONMENT MANAGEMENT PLAN:

1. GENERAL

1.1. INTRODUCTION

M/s. Sandhya Organic Chemicals Pvt. Ltd. falling under Small Scale category manufacture “Pesticides(Rodenticides) compound” at Plot No. 808 A/2, 3rd Phase, GIDC Estate, Vapi- 396 195, Dist- Valsad (Gujarat).

Sandhya Organic Chemicals Pvt. Ltd. is located in GIDC notified industrial area falling under Small Scale category manufacturing Pesticides (Rodenticides) – Aluminium Phosphide and Zinc Phosphide for which the company had obtained CC&A from Gujarat pollution Control Board. Now the company proposes to enhance the production capacity of the existing products under the category **“Pesticide (Rodenticides) Products” from 50MT/M to 200MT/M.**

1.2. PRELUDE

The Environmental Management Plan is defined as the environmental requirements and objectives of the project as well as the processes and procedures & it will govern project operational actions. The environmental management plan is mostly known in its abbreviated form as EMP. It constitutes the important part of an EIA study as the prime goal of EIA is to delineate the proper mitigation for probable impacts from the project. Basically, the EMP provides broad guidelines to minimize the potential environmental impacts from the project and to mitigate the consequences.

Adequately designed EMP serves as an essential tool & guidelines to strengthen the Environmental Management System to minimize or eliminate the predicted/identified adverse impacts during the impact assessment study. EMP also represents the commitment & efforts of the proponent to protect the environment as well as the neighbouring population to step forward with sustainable industrial development concept. EMP must ensure effective implementation, methodology & alternatives for mitigation measures planned / recommended to reduce or eliminate the adverse impacts likely or predicted to occur from various activities of the proposed project. Hence, the EMP has got high importance in formulation of EIA study report as well as in formulation of environmental management system.

It is understood that not only the study area but the region as a whole may get new economical fillip due to the proposed industrial development in an area but the company must have properly designed EMP to address all probable adverse impacts on the environment. In view of the study area and project requirements the proposed plan discusses appropriate measures to be considered during construction as well as operational phases. Mitigation measures at the source level and an overall management plan at the study area level are elicited in the present EMP so as to improve the

supportive capacity of the study area and also to preserve the assimilative capacity of the receiving bodies.

1.3. OBJECTIVE OF EMP

- The major objectives of the environmental management plan are:
- To comply with all the conditions of Approved TOR/ regulations/ applicable laws stipulated by MoEF or Central/ State Pollution Control Boards.
 - To control and remediate wastewater, emission & solid waste posing adverse impacts on environment by installing appropriate pollution control technology & equipment.
 - To plan & schedule environmental conservation & protection activities for the purpose of achieving environmental standards and to improve methods of environment management practices.
 - To improve workplace conditions for employees by reducing every kind of pollution and improving workplace environment/ atmosphere.
 - To eliminate/ reduce the possibility of potential hazard due to operations.
 - To make budgetary provision and allocation of funds for environment management system and to timely revision of budgetary provisions.
 - To encourage and inspire employees & contractor for highest performance and attentive response for environmental conservation, protection & improvement.
 - To contribute significantly for sustainable development by resource conservation, waste minimization/recycling/reuse and approaching to Cleaner Production practices.

The proponent industry – Sandhya Organics will adequately implement the present environmental management plan for its proposed plant at GIDC Vapi for environmental protection, conservation & Improvement. As it has been studied & described in earlier chapters, the potential for environmental pollution during construction phase of the proposed project would not major but the operational phase would have some considerable impacts which need to be mitigated by efficient & adequate structural & operational measures. Also considering the probable impacts of construction phase, it is required implementing proper operational and some general structural measures to overcome the issues of adverse impacts on environment.

Considering these facts and the necessity of structural & operational measures for mitigation of impacts of the proposed project, the present environmental management plan with necessary procedures have been planned for control of pollution during proposed project operations. The environment management plan, thus prepared for construction & commissioning phase as well as operation phase, is presented below in subsequent sections under respective headings.

1.4. EHS MANAGEMENT CELL

Apart from having an environmental management plan, it is also necessary to have a permanent organisational set up charged with the task of ensuring effective

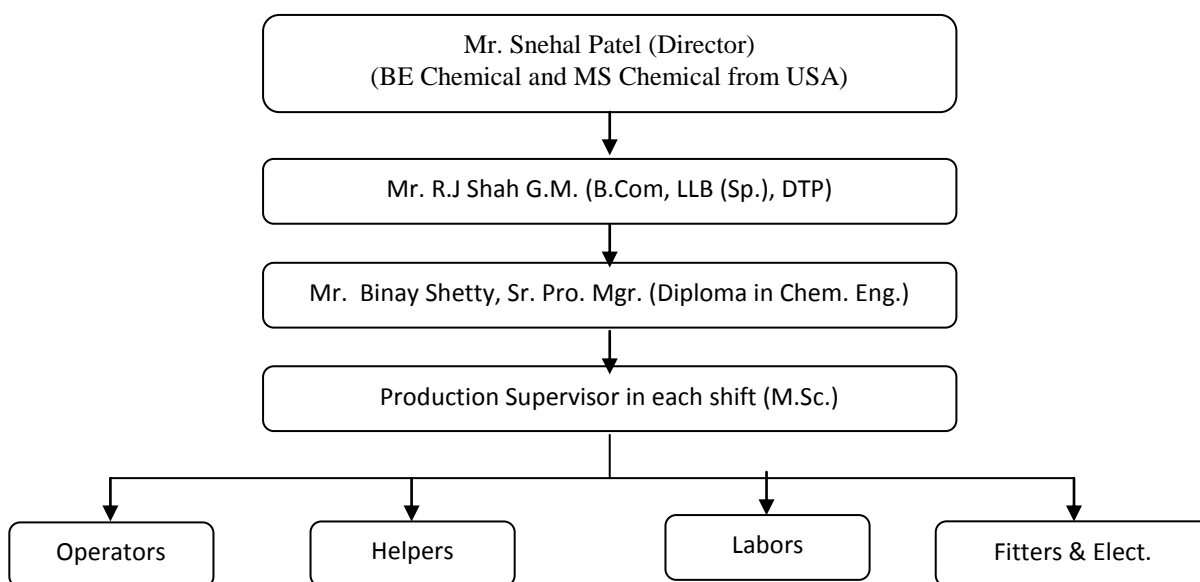
implementation. A designated team consisting of managers, officers, chemists, technicians, operators and other required personnel is formed to co-ordinate the activities concerned with environmental management and implementation of pollution control measures. The cell such formed keeps a close watch on the performance of the pollution control equipment, emissions from the sources and the quality of surrounding environment in accordance with the monitoring program. The cell undertakes the monitoring of environment pollution level internally and also by appointing external agency whenever necessary. In case the result of monitoring environment pollution found to be exceeding the prescribed value, the environmental management cell suggests remedial actions and get these suggestions implemented through the concerned plant authorities.

The cell also co-ordinates all the related activities such as safety & disaster/emergency management, hazard & risk prevention/control, collection of statistics of health of workers, population of the regions, afforestation and green belt development.

The cell also monitors for general and preventive maintenance of pollution control system done by the maintenance department to achieve optimum efficiency of the control equipment and to maintain the quality of the environment. The cell is also responsible for maintaining the records of all data, documents and information in line within the legislative requirement and will regularly furnish the same to the relevant authorities.

The setup of the Environmental Health & Safety Management Cell for proposed project will be the same as that of existing unit and as presented below in fig-1.1.

Figure 8.1: Organogram of EHS Cell



1.5. WATER & WASTEWATER MANAGEMENT

As described in earlier chapter, the minor quantity of water will be required temporarily during the tenure of construction activities, which will be met through GIDC water supply. Further, there would not be any kind of effluent generation and sewage will be disposed off through the sanitation facilities consist of septic tanks & soak pit. Thus, major mitigation measures are not required during construction phase. However, it is required that all possible efforts should be made to optimize the water consumption and to prevent wastage during the phase to reduce the impacts on surface water resources due to consumption.

The water requirement of after proposed project operation will be 20 KLD and wastewater generation will be 8.3 KLD. Further, as it has been planned that 100% wastewater from washing will be reused for scrubbing system. Total washing and scrubbing water is used to scrub phosphorous pent oxide to recover Phosphoric Acid as by product.

Thus, it has been noticed that the proponent has already planned & implemented major necessary mitigation measures for prevention/minimisation of the impact on water environment. Considering the planned mitigation measures & probable impacts, necessary recommendations are made below as EMP for Water & Wastewater Management including structural & non-structural measures.

Table 1.1: EMP for Water & Wastewater Management

Env. Issue	Mitigation measure	Implementation time & Responsibility
Construction & commissioning Phase		
Load on resources by consumption of water	<i>Structural measure:</i> <ul style="list-style-type: none">• Water Storage Tank• Earthen bund/barriers around the construction sites/areas• Proper material storage area, if required, properly lined with impervious materials	<ul style="list-style-type: none">• During construction & Commissioning,• Construction Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none">• Optimization of water consumption by avoiding unusual runoff from construction activity area• Proper arrangement & maintenance and regular inspection of water supply line to prevent leak from pipes & taps/ valves	<ul style="list-style-type: none">• During construction,• Construction Head
Wastewater Management & Prevention of water pollution	<i>Structural measure:</i> <ul style="list-style-type: none">• Proper sanitation facilities with septic tank & soak pit for disposal of sewage• Adequate structural facilities for prevention of any kind of contaminated	<ul style="list-style-type: none">• During Commissioning,• Construction Head

	runoff from construction area causing impacts outside premises- storm water drain along unit's boundary is already constructed to prevent runoff outside of premises	
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Ensuring availability & proper utilization of sanitation facilities • Disposal of sewage through septic tank & soak pit only and regular checking & maintenance for prevention of leak & overflow • Regular inspection & management for prevention of any kind of contaminated runoff from construction area • Earthen/Temporary bunds/barriers to prevent runoff 	<ul style="list-style-type: none"> • During construction, • Construction Head
Operation Phase		
Load on resources by consumption of water	<i>Structural measure:</i> <ul style="list-style-type: none"> • Proper arrangements for withdrawal of GIDC water. • Metering facilities for GIDC water consumption • Adequately designed cooling tower/ system with optimized cooling water requirement & evaporative losses 	<ul style="list-style-type: none"> • During Operations, • Utilities in-charge, • HSE Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Reduce wastage in domestic activities by preventing leak/spill from pipes, taps/ valves etc. • Use of Regular recording of water consumption, wastewater reuse quantity using flow meter • Maximum possible reuse of wastewater from washing and scrubbing. • Regular inspection, control & necessary maintenance for reduction of evaporation loss and blow down from cooling system • Minimisation of steam losses from boiler & steam lines and process • Optimisation of COC in cooling system 	<ul style="list-style-type: none"> • During operations, • Production In-charge • Utilities In-charge
Wastewater	<i>Structural measure:</i>	<ul style="list-style-type: none"> • During construction,

Treatment & discharge/ reuse/ recycle and prevention of water pollution	<ul style="list-style-type: none"> • Properly designed chemicals & hazardous waste storage area with properly lined impervious flooring • Stream Segregation pipelines/channels for Wastewater collection & treatment • Proper sanitation facilities with septic tank/ soak pit system for domestic wastewater discharge • Reuse of wastewater from washing for scrubbing system. Total washing and scrubbing water is used to scrub phosphorous pent oxide to recover Phosphoric Acid as by product. 	<ul style="list-style-type: none"> • Construction Incharge
	<p><i>Non-structural measure:</i></p> <ul style="list-style-type: none"> • Hazardous materials & wastes to be stored in designated storage area with impervious lining to prevent contamination of water • Prevention of mixing of any contaminated stream with storm water drainage • Maintaining records of water consumption, reuse of wastewater and maintenance of wastewater management system • Maintenance of good housekeeping to avoid contamination of water resources. 	<ul style="list-style-type: none"> • During operations, • HSE Head • Plant / Department In-charges

1.6. AIR POLLUTION CONTROL & MANAGEMENT

The issue of impact on air quality during construction phase is envisaged to be minor as construction is to be done for foundation and MS Structure. However, it has been noted that the air quality will be marginally affected due to emissions from vehicles, construction equipment & machineries as well as airborne construction materials and dusting from site. As the impacts are likely to be restricted within premises & in close proximity of site, no major structural mitigation measures are required. However, implementation of general structural & operational mitigation measures will be ensured to minimize the probable impacts of construction phase. Beside these, there would be considerable impacts on air due to emission from boilers, thermopacs & GG sets during the commissioning phase of proposed project. Hence, the commissioning phase requires major structural & operational mitigation measures mainly for control of pollution due to emissions.

During operation, ongoing emissions from the said utilities are the main source of impacts on air quality, which will be reduced after commissioning phase but would be noticeable. However, as the Natural Gas is proposed as the only fuel for the utilities, no specific APCDs are required for the utilities except provision of adequate stacks. In addition to these sources, air contamination due to accidental release of vapours & particulate of raw materials has also been anticipated. Hence, it has been suggested that utmost care will be taken to avoid such chances by providing adequate storage & handling facilities for materials by providing necessary structural & operational mitigation measures. Considering all these details related with necessary mitigation for proposed project, EMP for Air Pollution Control during construction & operation phase has been formulated as presented below in tabular structure.

Table 1.2: EMP for Air Emission Management

Env. Issue	Mitigation measure	Implementation & Responsibility
Construction & Commissioning Phase		
Temporary increased emissions from construction & commissioning operations	<i>Structural measure:</i> <ul style="list-style-type: none"> • Adequately designed enclosed area for reduction of particulate during materials storage & handling • Curtaining around the construction site to prevent particulate emission from construction works • Stacks of adequate height & internal diameter at top with sampling port. 	<ul style="list-style-type: none"> • During construction, • Construction Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Properly designed method & practices of transportation, storage & handling of materials will be established and maintained along with necessary facilities to reduce airborne particle of materials • Proper ventilation & other condition in storage area will be ensured and all materials must be stored in suitable packing to prevent contamination of air due to particulates & volatile emissions from storage area • All construction equipment, machineries & utilities will be maintained on regular basis to reduces emission • PUC certificate in case of all vehicles engaged in construction work will be ensured • Engines of Idle machineries, equipment, vehicles to be turned off when 	<ul style="list-style-type: none"> • During construction, • Plant /Construction Head • HSE Head

	<p>not in use.</p> <ul style="list-style-type: none"> • Prior to commissioning of plant, completeness of structural measures including fuels supply system will be ensured. • Adequate NG supply will be ensured prior to commission & throughout the commissioning of utilities. • Stack Monitoring will be done during the commissioning phase on regular basis to prevent high emission from utilities. • Proper functioning of allied facilities of utilities will be ensured before the commissioning of plant • Provision of necessary PPEs for employees engaged in activities of storage, transportation & handling of materials as well as construction & commissioning operations 	
Operation Phase		
Stationary emissions	<p><i>Structural measure:</i></p> <ul style="list-style-type: none"> • Stacks of adequate height & internal diameter are to be provided for efficient dispersion of emission from proposed utilities • Sampling port & monitoring point are provided on all stacks • Provision of ID fan with utilities/ stack to maintain desired velocity of exit gas, if required • Provision of preventive maintenance facilities for Stacks, Utilities, Storage area/vessels, pipelines etc. • Safety arrangements, facilities & equipment to prevent accidental emissions 	<ul style="list-style-type: none"> • During construction, • Construction Head
	<p><i>Non-structural measure:</i></p> <ul style="list-style-type: none"> • Optimum air-fuel ratio (AFR) in the utilities as per specifications are ensured throughout operation period • Un-interrupted functioning of FD/ID fans, if provided, are ensured to prevent back pressure in utilities as well as to keep desired velocity of emission at top of stacks efficient dispersion of gaseous pollutants in emissions. 	<ul style="list-style-type: none"> • During operations, • Maintenance personnel • Plant In-charge

	<ul style="list-style-type: none"> • Adequate NG supply will be ensured prior to commission & throughout the commissioning of utilities and no other fuel will be used in the utilities except emergency conditions. • Regular monitoring is done as per the Environmental Monitoring Plan & CC&A for checking efficiency of control equipment. • SOPs for start-up, shutdown and operation & maintenance procedures should be established and maintained. • Adequate set of compatible spares, a copy of drawing and operating procedure as per design specifications should be maintained and made easily available. • Provision of adequate process safety controls • Adequate greenbelt coverage, around the plant • Proper implementation of safety procedures and efficient use of safety arrangements, facilities & equipment to prevent accidental emissions • Provision for necessary PPEs for employee engaged with hazard prone area. 	
Process & Fugitive emissions	<p><i>Structural measure:</i></p> <ul style="list-style-type: none"> • Dust collecting systems over dust generation points are provided with the help of bag filter for control of fugitive dust emissions during blending and Tableting activities. • Adequately designed storage area with efficient air change ratio, handling & transport facilities are provided for raw materials & products • Phosphoric Acid Recovery System in reactor unit • Adequately designed process vents for Scrubbing system. • Properly designed, installed & maintained Gas skid, PRV station & NG pipelines connected to the utilities. • Air handling unit /adequate air ventilation system of sufficient capacity is 	<ul style="list-style-type: none"> • During construction, • Plant in-charge • Construction Head

	<p>to be provided in the entire production plant</p> <ul style="list-style-type: none"> • Gravity charging from enclosed containers, and enclosed vacuum, pressure, and pumping systems during charging and discharging operations to minimize fugitive emissions; • Installation of local exhaust ventilation (LEV) at Tablet machine to capture fugitive dusts. 	
	<p><i>Non-structural measure:</i></p> <ul style="list-style-type: none"> • Properly designed method & practices of transportation, storage & handling of materials are established and maintained along with necessary facilities to reduce airborne particle of materials • Proper ventilation & other condition in storage & production area are ensured and all materials are stored in suitable packing to prevent contamination of air due to particulates & emissions from storage area • Closed materials charging and sampling practices are established & ensured. • Adequate function of P2O5 recovery system in reaction unit are ensured all the time • Proper velocity & function of Process vents are ensured all the time • SOPs for start-up, shut down, operation & maintenance procedures are established & maintained in all relevant area of works. • Work place monitoring for AAQM are done as per 'Post project monitoring plan' as well as regulatory requirement as per factory act. • Regular maintenance & operations of all process vent, P2O5 recovery system & gas pipeline for efficient functioning • Proper implementation of safety procedures and efficient use of safety arrangements, facilities & equipment are ensured at all time of operation to prevent accidental release of 	<ul style="list-style-type: none"> • During operations, • Plant in-charge

	materials & fuels as well as prevent fire hazard. <ul style="list-style-type: none"> • Provision for necessary PPEs for employee engaged with hazard prone area • Regular occupation health check-up program for all employee 	
Vehicular emissions	<i>Structural measure:</i> <ul style="list-style-type: none"> • Low emission vehicles are preferred for transportation 	<ul style="list-style-type: none"> • During construction, • Construction Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Requirement of PUC are compulsory for all vehicle engaged in proposed project activities • Checking of PUC certificate for validity & emission level in exhaust of all entering vehicles • All vehicles are maintained in well condition by regular preventive maintenance to reduce the exhaust level 	<ul style="list-style-type: none"> • During operations, • Site President, • Security person • HSE Head

1.7. HAZARDOUS / NON-HAZARDOUS WASTE MANAGEMENT

During construction phase, earthen materials as well as construction wastes like concrete waste, waste, metal scrap and empty bags/containers are likely to be generated, which are nonhazardous & recyclable. As per the Hazardous Waste Management, Handling and Transboundary movement Rules – 2008; Used Oil & empty containers/drums/carboys are the Hazardous waste, to be generated from the unit during operational phase. The hazardous wastes are mandatory to manage as per statutory requirements and proponent has already made provision of the hazardous waste management system in their project planning. Hence, no major structural mitigation is required except proper waste storage area. All waste, is recycled/reused directly or indirectly so additional mitigation is not required.

The Company has made provision of well designed and adequate hazardous & non-hazardous waste storage area as per CPCB / MoEF guidelines. All wastes are disposed off through the proper disposal modes including the disposal through TSDF, authorised recycler/dealers as well as sell of non-hazardous waste to actual users &/or manufactures. The company has already acquired membership of TSDF for disposal of hazardous waste. These planned waste management system is adequate to manage the load from proposed project and thus this mitigation measures are efficient to prevent impacts of waste from proposed project. However, to ensure proper handling, storage and disposal of hazardous/ non-hazardous wastes, the following measures have been proposed by the industry or suggested by the EIA agency.

Table 1.3: EMP for Waste Management

Env. Issue	Mitigation Measure	Implementation & Responsibility
Construction & Commissioning Phase		
Construction Waste management.	<i>Structural measure:</i> <ul style="list-style-type: none"> • A separate designated storage area for each category of wastes and excavated earthen material/soil. • Proper handling & transportation system for construction wastes 	<ul style="list-style-type: none"> • During construction, • Construction Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Proper storage of construction & other waste and excavated earthen material/soil. • Use of excavated soil for landscaping & gardening/greenbelt development • Sell of empty containers/bags and scrap to scrap dealer. 	<ul style="list-style-type: none"> • During construction, • Construction Head
Operation Phase		
Hazardous/ Non- Hazardous waste management.	<i>Structural measure:</i> <ul style="list-style-type: none"> • Provision of designated storage area as per MoEF/CPCB guidelines are provided with sign boards/labels for each category of hazardous & nonhazardous wastes generated from the unit. • Proper Handling & Transportation system /facilities for hazardous/nonhazardous wastes 	<ul style="list-style-type: none"> • During operation, • Plant In-charge • HSE Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Proper storage of all hazardous wastes in their designated storage area. • Transportation of hazardous waste to the TSDF governed as per the guidelines and accompanied with Form-9 as per statutory provisions. • Annual returns of the disposal of wastes in Form- 4 and Form-13 are submitted regularly to the office of local pollution control authority. • Proper handling, loading & unloading of waste are monitored during waste handling, storage & transportation to avoid spillage/leak causing contamination of soil / environment • Adequate utilization of non-toxic/non-hazardous wastes and reusable/recyclable waste (especially empty 	<ul style="list-style-type: none"> • During operation, • Maintenance personnel • Plant In-charge • HSE Head

	containers & bags and used oil) are ensured by promoting recycler or end-users of products derived from such wastes.	
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1.8. OISE CONTROL & MANAGEMENT

As noticed, the noise generation during the construction will be temporary and restricted within premises. Only operations of construction equipment, machineries and installation works will be the main sources of noise and the issue of noise pollution from these sources can be reduced to acceptable level by proper mitigation measures. During operation phase, operation of D.G. Set & equipment like Ball Mill etc. will generate considerable noise, which will be significant only in the particular area of source. For noise reduction and attenuation, following measures have been proposed by the industry or suggested by the EIA agency.

Table 1.4: EMP for Noise Control

Env. issue	Mitigation measure	Implementation & Responsibility
Construction Phase		
Noise	<i>Structural measure:</i> <ul style="list-style-type: none"> Noise generating & vibrating equipments will be mounted on sturdy concrete foundations with rubber padding to reduce vibrations. All rotating equipment/equipment or part thereof will be dynamically balanced and provided with proper non/low vibrating enclosures Suitable barrier around the construction site wherever/ whenever required to reduce noise level outside the project premises Adequate greenbelt shall be developed to help in attenuation of noise 	<ul style="list-style-type: none"> During construction, Construction Head
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> Regular lubrication & preventive maintenance will be done to reduce noise generation. Ear plugs/muff will be provided to all construction workers/employees at place of high noise levels All vehicles shall maintain speed limit inside the premises & loud horns & unusual acceleration of engine will be prohibited 	<ul style="list-style-type: none"> During operations, Maintenance personnel, Env. & Safety Manager
Operation Phase		
Noise	<i>Structural measure:</i> <ul style="list-style-type: none"> Noise generating equipments like D.G 	<ul style="list-style-type: none"> During construction, Construction Head

	set, Ball Mill etc. are kept in isolated closed room. • Adequate greenbelt will be developed and maintained around high noise area as well as plant premises to help in attenuation of noise.	
	<i>Non-structural measure:</i> • Regular lubrication & preventive maintenance are done to reduce noise generation • Use of PPE like ear plugs and ear muffs is made compulsory near the high noise generating machines. Moreover, the personnel are provided breaks in their working hours, with the continuous exposure not increasing three. (3) hours. • Periodic monitoring of noise levels as per post-project monitoring plan will be done on regular basis	• During operations, • Site President, • Maintenance personnel • Env. & Safety

1.9. PROTECTION & CONSERVATION OF ECOLOGY

The proposed project would be sited in an industrial land situated in the notified industrial estate of Vapi, which is considerably away from ecologically sensitive area of the region. Besides, there is no settlement in the proximity of the plant and the nearest ecologically sensitive areas – forest & agriculture land are situated far away from the core impacts zone. Besides, it has been noticed that the emissions, noise generation and water pollution as well as hazardous waste management would not have any potential to cause any damage to the ecologically sensitive areas of the region. Hence, the proposed project would not have any direct impact on ecological layout during both phases. Therefore, major mitigation measures are not required for construction phase & operation phase except the pollution control measures suggested in other sections. Besides, it is also planned by proponent to develop greenbelt area in & around the construction site as per greenbelt development plan described in this chapter. This greenbelt will slightly improve the ecological status of the project site area.

Considering, the potential impacts on ecology, the following mitigation measures and action plan for conservation, protection & improvement of ecology of the area are suggested by the EIA agency for construction & commissioning and operation phases as common EMP.

Table 1.5: EMP for Conservation of Ecology

Env. issue	Mitigation measure	Implementation & Responsibility
Construction & Commissioning Phase and Operation Phase		
Ecological Conservation &	<i>Structural measure:</i> • Enclosed storage area for reduction of	• During construction, • Construction Head

protection	particulate emission. <ul style="list-style-type: none"> • Proper arrangement for materials storage & handling to prevent emissions from construction site/ operation area • Stacks of adequate height & internal diameter are e provided for existing & proposed utilities. • All necessary structural mitigation measures suggested/planned for control of air & water pollution, waste management and noise control and safety & emergency management 	
	<i>Non-structural measure:</i> <ul style="list-style-type: none"> • Regular monitoring of stack for Emission & Ambient air quality as per monitoring plan. • No disposal of effluent & waste on land or in water bodies • Noise level outside premises will not exceed stipulated standards for industrial area • Proper safety measures & emergency management plan to prevent impacts of major hazards on ecology • Major transpiration through highway networks & main approach road • Proper & efficient implementation of mitigation measures & EMP suggested for Air, Water & Noise environment. 	<ul style="list-style-type: none"> • During operations, • Maintenance personnel • Env. & Safety Manager

1.10. MATERIAL STORAGE & HANDLING

Company has provided adequate facilities for storage & handling of the materials within the premises. As described in earlier chapter company has provided designated areas for chemical storage. Also it has been planned to provide impervious flooring as well as proper ventilation in the area. Considering the planned & existing facilities & measures as well as probable impacts from material storage & handling as identified in current study, following environmental management plan has been suggested to prevent impacts on environment due to material storage & handling.

- Standard Operating Procedures (SOPs) are adopted for all aspects of material handling and operation of the system.
- Bulk materials are transported in truck loads and are unloaded & stacked in the designated storage area.
- Necessary PPEs like hand gloves, gumboot, goggles, helmet etc., fire fighting arrangements like - Portable fire extinguishers, Sprinkler system, External hydrant system, fire tender etc. and medical facilities like - First aid boxes, etc. are/will be provided in the unit to meet emergency in case of an accident.

- In addition to the above, all necessary measures for material storage and handling as incorporated in the Risk assessment report & onsite emergency plan are implemented & monitored.
- Phosphorus being Dangerous goods of Class 4.2 (Spontaneously Combustible) is transported in air-tight M.S. Barrel and under Water. It is stored in cool place, Out of direct sunlight and away from oxidizing agents and sources of heat or ignition.
- Handling of Phosphorus is done either by Hand Trolley or by way of lifting arrangement and is transferred by way of Gravity System in close Circuit. Cover with WET earth, sand or other non-combustible material.
- To control the Hazards of Phosphine, Aluminium Phosphide is packed in Air Tight condition and is stored in proper ventilated godown.
- Zinc Phosphide is packed in Well Sealing Tin / Pouch in double packing.

1.11. OCCUPATION HEALTH & SAFETY MANAGEMENT

Achieving high standards in Health, safety and environment management is one of the key targets /goals of the company. Company is committed towards ensuring high level of health & safety of its employee. To maintain high standard in Health, Safety and Environment, necessary key mitigation measures & action plan as EMP has been suggested as described below.

- Management has provided necessary PPEs, safety equipments/materials to ensure healthy & safe work conditions. Regular inspection for the safety procedures and use of PPEs & Safety equipments/material is done by the management/safety cell. Proponent will practice similar practices after proposed project & also ensure that all necessary PPEs, Safety materials/equipments are/will be in place.
- Workplace monitoring are carried out on regular basis. All records & documents related with the workplace monitoring & health check-up program are maintained by the proponent on regular basis. Especially, the workplace monitoring for P2O5 is done on regular. Necessary documents, reports & records of this monitoring are maintained & reviewed to avoid any impacts on human health.
- Safety documents, procedures, guidelines along with MSDS are provided to the associated/concerned personnel engaged in respective operational activities.
- Training programs & safety audit are done on regular basis to prevent impacts of the operational activities on occupational health as well as to improve workplace condition & safe work system.
- The proponent ensures implementation of emergency management plan with provision of fire fighting equipment / facilities, first aid & medical facilities, evacuation procedures etc. Proponent will also ensure proper implementation & functioning as well as assess effectiveness of this safety & emergency system on regular basis throughout the project operation phase.

1.12. LANDSCAPING & GREENBELT DEVELOPMENT

The plantation and green belt development in an area functions as foreground and background landscape features resulting in harmonizing and amalgamating the physical structures of the plant with surrounding environment but also acts as pollution sink. Plantation also replenishes the air and improves the water and soil quality. It also acts as a noise barrier and it is a crucial interface in the management of the environment. The

greenbelt enhances the aesthetic values of the site and provides healthy environment. Proper design of greenbelt around the pollution sources could play a significant role in abatement of pollution.

The proponent M/s. Sandhya Organics has already allocated land for greenbelt area within the existing premises. The allotted land admeasures 432 m² for greenbelt in the premises. The greenbelt development program has already been started by the proponent. The details are depicted in the plant layout plan (Figure 2.3). The list of species selected for plantation and proposed to be planted in the greenbelt area is presented in subsequent Table.

General Guidelines followed for Green Belt Development

1. Trees growing up to 5 m. or more in height shall be planted around the installation.
2. Trees shall be planted along roadsides, to arrest auto-exhaust and noise pollution, and in such a way that there is no direct line of sight to the installation when viewed from a point outside the foliage perimeter.
3. Since tree trunks are normally devoid of foliage (up to 3 mtr.), it will be appropriate to have shrubbery in form of such trees to give coverage to this portion. Fast growing trees with thick perennial foliage shall be grown, as it will take many years for trees to grow to their full height.
4. Canopy size & height of the plant/tree shall be considered to provide thick multi-tier plantation
5. For re-plantation, the plants and saplings suitable for the soils of project site regional conditions shall be considered. It is recommended to plant fast growing local plant species, which can adapt to the local climate.

Table 1.6: Floral Species Recommended for Greenbelt

Sr. No.	Scientific Name	Common Name	Family
1.	<i>Rosa berberifolia</i>	Rose	<i>Rosaceae</i>
2.	<i>Jasminum sambac</i>	Mogra	<i>Jasminum sambac</i>
3.	<i>Ocimum sanctum</i>	Tulsi	<i>Lamiaceae</i>
4.	<i>Ficus elastica</i>	Rubber	<i>Moraceae</i>
5.	<i>Nelumbo nucifera</i>	Lotus	<i>Nelumbonaceae</i>
6.	<i>Helianthus annuus</i>	Sun Flower	<i>Asteraceae</i>

1.13. CORPORATE SOCIAL RESPONSIBILITY

Numerous activities are being conducted by the company in various sectors of social development. The company has provided donation of Rs. 5, 00,000/- to Shah Bhikhamchandji Ghambhirmalji Chhajed Education Society, Phansa, Bhilad, Gujarat. Similar activities through the company will be conducted by the proponent after proposed project to fulfil its commitments & duties towards the society. The company intends to donate 2% of the profit to agencies like educational facilities, religious institutes or social welfare societies for projects carried out in nearby village for their welfare and upliftment.

1.14. CLEANER PRODUCTION ACTIVITIES

Reduction of waste at source by adoption of cleaner processes/ technologies/ operations, resource optimization, energy conservation and reduce/ reuse /recycle of waste are the principal approaches of Cleaner production activities. With adequate Implementation of necessary & suitable actions of cleaner production approaches, cost of production as well as pollution potential of the manufacturing process can be reduced significantly. The proponent has already planned & implemented some action in terms of energy conservation, resource recovery & reuse and direct/indirect waste (used oil, empty bags/drums/containers) recycling/reuse. Following are some considerable action plan implemented & proposed for development & implementation of “Cleaner Production Action Plan” as a part of project management.

1.14.1. CLEAN FUEL USAGE

For the existing project Boiler and D.G. Set are installed and for the proposed project, an additional boiler will be installed. These utilities needs fuel as main raw materials for heat & power requirement of the proposed project. As it has been planned, the Compressed Natural Gas is and will be used as fuel. As the NG is defined & accepted as cleaner fuel, it will have negligible potential of pollution of air. Thus the GHG emission would be significantly low from the proposed project, which will be very good step towards sustainable & cleaner development.

1.14.2. RESOURCE CONSERVATION, RECOVERY & RECYCLING

Water is an important resource and recovery, recycling & reuse of the water is the essential practice of an industry if it is possible. The proponent recovers Phosphoric Acid from the wastewater generated from Washing and Scrubbing system. This action is very step towards protection of environment as well as resource conservation and at last but not least towards cleaner production goal.

1.14.3. WASTE RECYCLING & REUSE

Hazardous wastes like discarded containers/drum/carboys & used oils will be recycled through appropriate arrangements as per GPCB/CPCB guidelines.

Annexure III

Financial Details

Sr. No.	Particulars	Existing, Rs. Lakhs	Proposed, Rs. Lakhs	Total, Rs. Lakhs
1	Land	9.09	--	9.09
2	Building and Civil works	55.81	20.00	75.81
3	Plant & Machinery and other fittings	104.21	90.00	194.21
4	Environmental protection measures	10.00	30.00	40.00
	Total :	179.11	140.00	319.11

(Source: Sandhya Organics – Vapi)