

**COMPLIANCE REPORT**

Environmental Clearance No. SEIAA: 7 : IND : 2012 Date:30/09/2013

**ANUGRAHA CHEMICALS**

Plot No. D46 to D50, C62 and C63, KSSIDC Industrial Area, Doddaballapur, Bangalore Rural District.

Sl. No.	EC CONDITIONS	Mention yes or no and also other details wherever applicable	Remarks
<b>Part A- SPECIFIC CONDITIONS</b>			
1	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended time to time shall be followed by the unit.	Yes	Being maintained.
2	The industrial effluent generation shall be sent to common effluent treatment plant(CETP). The sewage shall be disposed through Septic tank & soak pits.	Yes	The trade effluent generated is being sent to CETP. The sewage is being disposed to septic tank followed by soak pit.
3	The project authorities shall maintain daily logbook of the quantity and quality trade effluent generated and dispatched to the CETP.	Yes	We are connecting to CPCB web portal for daily data maintainance of quantity if generated and dispatched trade effluent.
4	Total water requirement from KSSIDC water supply shall not exceed 15 KLD and prior permission shall be obtained from the concerned Authority. No ground water shall be used.	Yes	We are not utilizing the water more than 15KLD and also we are not drawing the water from ground sources and source of water for our industry is private tankers



5	The process emissions from the boiler shall be dispersed through stack of adequate height as per CPCB/Karnataka State Pollution Control Board standards. The gaseous emissions from the DG set shall be dispersed through stack height as per CPCB standards shall be provided. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.	Yes	We are having a 1 TPH capacity of wood Boiler, 0.6 TPH capacity of HSD Boiler and 320KVA capacity of DG set with adequate height of stack and DG set is enclosed by acoustic enclosures as per rule.
6	Ambient air quality data shall be collected as per NAAQES standards notified by the Ministry vide G.S.R. No. 826(E) dated 16th September, 2009. The levels of PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , VOC, and HCl shall be monitored in the ambient air and emissions from the stacks and displayed at a convenient location near the main gate of the company and at important public places. The company shall upload the results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MoEF, Bangalore, SEIAA, Karnataka, the respective Zonal office of CPCB and the Karnataka State Pollution Control Board.	Yes	Monthly monitoring is being done for PM <sub>10</sub> , SO <sub>2</sub> and NO <sub>x</sub> but VOC and HCl is not done, will be included soon and monitored data has been displayed on board at main gate of the company. Copy of display board is enclosed.
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, Bangalore, SEIAA, Karnataka, the respective Zonal office of CPCB and the Karnataka State Pollution Control Board. The levels of SPM, RSPM, SO <sub>2</sub> , NO <sub>x</sub> and VOC(ambient levels) 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.	Yes	Uploading of status of compliance for the EC conditions to the webiste is not being done as of now. monitored data has been displayed on board at main gate of the company. copy of display board is enclosed.
8	The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Transboundary Movement) Rules, 2008 for management of hazardous wastes and prior permission from KSPCB shall be obtained for disposal of solid/ hazardous waste in the TSDF. The concerned company shall undertake measures for fire fighting facilities in case of emergency.	Yes	Obtained. Reference number of No.PCB/WMC/1424/HWM/2017-18/H757, dated: 29 Nov 2017 and we have facilities of emergency response plan for fire occurs



9	<p>In plant control measures for checking fugitive emissions from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling &amp; conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits stipulated by the KSPCB.</p>	Yes	<p>As of now no checking of fugitive emissions being maintained. We have taken measures for control fugitive emissions by providing closed storage, closed handling &amp; conveyance of chemicals/materials and water sprinkling system. We have providing dust suppression system by sprinkling of water at loading and unloading areas to control dust emissions.</p>
10	<p>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>	Yes	<p>Hazardous chemicals are being stored in drums with safe manner and flame arresters will be considered in future. pumps are being provided for transfer of solvent.</p>
11	<p>The company shall undertake following Waste Minimization measures:-</p> <ul style="list-style-type: none"> <li>a. Metering and control of quantities of active ingredients to minimize waste.</li> <li>b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.</li> <li>c. Use of automated filling to minimize spillage.</li> <li>d. Close Feed system into batch reactors.</li> <li>e. Venting equipment through vapour recovery system.</li> <li>f. Use of high pressure hoses for equipment clearing to reduce wastewater generation.</li> </ul>	Yes	<p>Metering and control of quantities, reuse of by-products, close feed system and venting equipment are being maintained and automated filling and high pressure hoses are considered in future.</p>



12	<p>For control of fugitive emission following steps shall be followed:-</p> <p>Closed handling system shall be provided for chemicals.</p> <p>b. Reflux condenser shall provided over reactor.</p> <p>c. System of leak detection and repair of pump/ pipeline based on preventive maintainance.</p> <p>d. The acids shall be taken from storage tanks to reactors through closed pipeline. Storage tanks shall be vented through trap receiver and condenser operated on chilled water.</p> <p>e. Cathodic protection shall be provided to the underground solvent storage tanks</p>	a. Yes	<p>Closed handling system, double reflux condensers and trap receiver are being maintained. The system of leak detection, repair of pumps and closed pipeline for acids are considered in future and cathodic protection is not being maintained because do not have underground solvent storage tanks.</p>
13	<p>Solvent management shall be as follows:-</p> <p>Solvent used in the process shall be completely recovered and reused.</p> <p>b. Reactor shall be connected to chilled brine condenser system.</p> <p>c. Reactor and solvent handling pump shall have mechanical seals to prevent leakages.</p> <p>d. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.</p> <p>e. Solvents shall be stored in a separate space specified with all safety measures.</p> <p>f. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.</p> <p>g. Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.</p> <p>h. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by KSPCB.</p>	a. Yes	<p>Solvent recovered and reused, chilled brine condenser system to reactors, mechanical seal to pump, sufficient HTA and residence time for condensers, proper earthing, solvents stored in specified separate space, flame proof of entire plant, solvent storage tank with breather valve are being provided and monitoring of fugitive emissions is not being done will be included as soon.</p>
14	<p>No effluent shall be discharged outside the factory premises and "Zero" discharge concept shall be adopted.</p>	Yes	<p>Being maintained.</p>



15	Multi-cyclone followed by bag filter shall be provided to the boilers to control particulate emissions within 100mg/ Nm <sup>3</sup> . The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/APPCB guidelines.	Yes	Multi-cyclone is being provided to the boilers to control particulate emissions. Stack with adequate height has been provided for boilers.
16	Two stage chilled water/ caustic scrubber shall be provided to process vents to control HCl. Two stage scrubbers with caustic lye media solution shall be provided to process vents to control SO <sub>2</sub> . The scrubbing media shall be sent to effluent treatment plant(ETP) for treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. At no time, the emission levels shall go beyond the prescribed standards.	Yes	Yes, water-caustic scrubbers are provided to control HCl and SO <sub>2</sub> . Scrubbing media being sent to CETP for treatment. Efficiency of scrubber being monitored regularly.
17	As proposed, process organic residue and spent carbon shall be sent to cement industries. ETP sludge, process (inorganic) & evaporation salt shall be disposed off to the TSDF. The ash from boiler shall be sold to brick manufacturers.	Yes	It is being sent for incineration
18	Boiler ash shall be stored separately as per CPCB guidelines so that it shall not adversely affect the air quality, becoming air borne by wind or water regime during rainy season by flowing along with the storm water. Direct exposure of workers to fly ash & dust shall be avoided.	Yes	Boiler ash being stored separately away from wind and water regime.
19	During transfer of materials, spillages shall be avoided and gullies drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.	Yes	We have providing drains to avoid mixing of accidental spillages with domestic waste and storm drains.
20	The company shall harvest surface as well as rainwater from the rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Yes	Rainwater is being harvested from the rooftops of the building for the various activities of the project. The storm drains being provided for recharge the ground water source.



21	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the OISD 117 norms.	Yes	Fire extinguisher at prominent places and also fire hydrant system are provided.
22	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.	Yes	Training is given to all employees on safety and health aspects of chemical handling being provided. Pre-employment and routine periodical medical test to employees being maintained regularly.
23	Usage of PPEs by all employees/ workers shall be imparted.	Yes	The PPEs such as shoes, helmets, goggles, gloves, uniforms, mask and earmarks etc being provided to all employees.
24	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Yes	Being maintained.
25	Green belt shall be developed in at least 33% of area with suitable species of the plants as per the CPCB guidelines to mitigate the effects of fugitive emissions. Selection of plant species shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be diverted for any other purposes.	Yes	Being maintained.
26	The adequate financial provisions shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be diverted for any other purposes.	Yes	Complied
27	The company shall comply with the recommendations made in the EIA/EMP/Risk assessment report. Risk assessment shall be included in the safety manual.	Yes	Complied



28	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. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	Yes	No construction of building will arising the expansion is occurs in existing premises.
29	The project authorities shall construct toilet facility and provide school uniform facility to the nearby schools with a budget of Rs. 75,000 and donate Rs. 25,000 to Prime minister's National Relief Fund for rehabilitation of Uttarakhand Flood Victims towards the corporate social commitment made vide letter dated 23.09.2013 with a total budget not less than Rs. One Lakh.	Yes	Construction of toilet and providing of school uniform facilities are considered in future and Fund of Rs. 25,000 towards the corporate social commitment has been done.
30	The project authorities also shall earmark at least 5 % of the total cost of the project towards the corporate social responsibility and item-wise details along with time bound action plan shall be prepared and submitted to the Authority.	Yes	Not being done. Will discuss this internally and take it up in future.

## II. GENERAL CONDITIONS

1	The project authorities shall strictly adhere to the stipulations made by the Karnataka State Pollution Control Board (KSPCB).	Yes	Being maintained.
2	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	Yes	Being monitor the emissions regularly the parameteres levels are within prescribed limits. Pollution control system also being monitor regularly its effective to control pollution.
3	No further expansion or modification in the plant shall be carried out without prior approval of the SEIAA/Ministry of Environment and Forests as the case may be. In case of deviations or alterations in the project proposal from those submitted to this Authority for clearance, a fresh reference shall be made to the authority to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	Yes	We have obtained EC for our existing activity now we are applying to take approval of EC for expansion from the SEIAA/ Ministry of Environment and Forests.



4	The gaseous emissions(Nox, SO2 and SPM) and Particulate matter along with RSPM levels from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control. measures are rectified to achieve the desired efficiency. Stack monitoring for SO2,NOX and SPM shall be carried.	Yes	Being monitor the gaseous and Particulate matter emissions regularly the parameteres levels are within prescribed limits. Pollution control system also being monitor regularly its effective to control pollution.
5	The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended in October 1994 and January 2000. all transportation of Hazardous Chemicals shall be as per the MVA, 1989. Authorization from the KSPCB shall be obtained for collection, treatment, storage, and disposal of hazardous wastes.	Yes	Being maintained the rules and regulation of manufacture, storage and import of hazardous chemicals. The authorization obtained in the reference number of No.PCB/WMC/1424/HWM/2017-18/H757, dated: 29 Nov 2017
6	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2003. Authorization from the KSPCB must be obtained for collection/treatment/storage/disposal of hazardous wastes.	Yes	Complied as above.
7	Application of solar energy should be incorporated for illumination of common areas, lighting for gardens and street lighting in addition to provision for solar water heating. A hybrid system or fully solar system for lighting and heating should be provided. Details in this regard should be submitted to the SEIAA.	Yes	Application of solar energy is considered in future.
8	The overall noise levels in and around the plant area shall be kept well within the standards(85 dBA) 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, Rules, 1989 viz. DBA(day time) and 70 dBA(night time).	Yes	Being maintained.



9	The project proponent shall also comply with all the environmental protection measures and safeguards as per the information provided.	Yes	Being maintained.
10	The implementation of the project vis-à-vis environmental action plans shall be monitored by MoEF, Regional Office at Bangalore/KSPCB/CPCB and the Department of Environment & Ecology, Bangalore. A six monthly compliance status report shall be submitted to monitoring agencies.	Yes	Being maintained.
11	The project proponent shall inform the public that the project has been accorded environmental clearance by the SEIAA and copies of the clearance letter are available with the KSPCB and may also be seen at Website of the Authority at <a href="http://www.sciaa.kar.nic.in">http://www.sciaa.kar.nic.in</a> . 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 MoEF Regional Office at Bangalore / KSPCB/CPCB and the Department of Environment & Ecology, Bangalore.	Yes	We have given advertisement in the two leading local newspapers viz. The Hindu and Udayavaani on 31st oct 2013. Copy of the same is enclosed.
12	The project authorities shall inform the MoEF Regional Office at Bangalore/ KSPCB/CPCB and the Department of Ecology and Environment, Bangalore, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Yes	We have taken permission for operation and industry is running now we are applying EC for expansion.
13	The SEIAA, Karnataka may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Ok	Agreed
14	The SEIAA, Karnataka reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Ok	Agreed
15	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1981 the Environment (Protection) Act, 1986 Hazardous Wastes (Management and Handling) Rules, 2003 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Ok	Agreed
16	The issue of Environment Clearance doesn't confer any right to the project proponent to operate / run the project without obtaining statutory clearances / sanctions from all other concerned Authorities.	Ok	Agreed



17	Concealing factual data or submission of false/ fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environmental (Protection) Act, 1986.	Ok	Agreed
18	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Yes	Complied
19	Officials from the Department of Environment and Ecology, Bangalore/ Regional Office of MoEF, Bangalore who would be monitoring the implementation of Environmental safeguards should be given full cooperation, facilities and documents/ data by the project proponents during their inspection. A complete set of all the documents submitted to MoEF/SEIAA should be forwarded to the CCF, Regional Office of MoEF, Bangalore/ Department of Ecology and Environment, Bangalore / Regional Officer, KSPCB Bangalore.	Yes	Complied
20	In the case of any change(s) in the scope of the project, the project would require a fresh appraisal by this Authority.	Ok	Agreed
21	The Authority reserves the right to add additional safeguard measures subsequently, if found necessary and to take action including revoking of the environment clearance under the provisions of the Environment (Protection) Act, 1986 to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manner.	Ok	As of now we have providing sufficient safeguard measures if found necessary to add additional safeguard measures we will provide.
22	All other statutory clearances such as approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained, as applicable by project proponents from the competent authorities.	Ok	as of now no approvals are taken from concerned authorities for storage of diesel will considered this in future,
23	These stipulations would be enforced among others under the provisions of water( Prevention and Control of Pollution) Act 1974, the Air (Prevention and Control of Pollution) Act 1981, the Environment (Protection) Act 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification, 2006.	Ok	Agreed



24	Under the provisions of Environment (Protection) Act, 1986, legal action shall be initiated against the project proponent if it is found that construction of the project has been started without obtaining environmental clearance.	Yes	We have obtained EC for our existing activity now we are applying EC for expansion in existing premises so no construction of building is arising.
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