

# EC Conditions Six Monthly Compliance Report

(by Project Proponent)



**Proposal No : IA/AP/IND2/50625/2016**

## 1. Name of the Entity / Corporate Office :

## 2. Proponent Details :

|                  |                |                 |                                |
|------------------|----------------|-----------------|--------------------------------|
| Proponent Name : | Jaswanth Reddy | Designation :   | Executive Director (Technical) |
| Telephone No :   | 08518-280006   | Mobile No :     | +91 9848079064                 |
| Fax No :         | 08518-280098   | Email Address : | sraaclab@rediffmail.com        |
| Website :        |                | Pin Code :      | 518004                         |
| State :          | Andhra Pradesh | District :      | Kurnool                        |
| Village/Town :   |                |                 |                                |



## 3. Compliance Letter/Report (Proponent):





## 4. Summary Status of Compliance :



|                    |    |                      |   |
|--------------------|----|----------------------|---|
| Total Condition :  | 39 |                      |   |
| Complied :         | 32 | Being Complied :     | 4 |
| Not Complied :     | 0  | Partially Complied : | 0 |
| Agreed to Comply : | 3  |                      |   |




## 5. Details of Production and Project Area :

## 6. Specific Conditions (Proponent):

| S.No | Condition   | Self Declaration | Remarks / Reason  | Supporting Documents  | Observation of IRO |
|------|---|------------------|---|---|--------------------|
| 1    | Process organic residue and spent carbon, if any, shall be sent to the cement industries. ETP Sludge, process inorganic & evaporation salt shall be disposed off to the TSDF. | Complied         | Process Organic residue sent to in-house incinerator. ETP sludge, process inorganic & evaporation salts sent to In-House secured land fill. No spent carbon generated anticipated |  |                    |
| 2    | As already committed by the project proponent, Zero liquid discharge shall be ensured and no Waste/treated water shall be discharged outside the premises.                    | Complied         | No effluent is discharged outside the plant premises. Total effluent is treated in ZLD  |  |                    |


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|   |  |          | system and reused.   |   |  |
| 3 | 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 the sources of the noise generation. The ambient noise levels shall conform to the standards prescribed under environment (Protection) Act, 1986 rules, 1989 viz. 75 d BA (day time) and 70 dBA (night time).  | Complied | Complied Noise levels were being monitored regularly in and around the plant.  | N/A   |  |
| 4 | Solvent management shall be carried out as follows i Reactor shall be connected to Chilled brine condenser system ii Reactor and solvent handling pump shall have mechanical seals to prevent leakage iii The condenser shall be provided with sufficient HTA and residence time so as to achieve more than 98% 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 whenever solvent handling is d | Complied | All the reactors in the plant were provided with chilled brine and cooling water circulation. Separate space is provided for solvent storage. Where ever applicable the plant was made flame proof.        |    |  |
| 5 | To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines   | Complied | Automatic interlocks on chlorine storage tanks, chlorine sensors for leak detection, HCl scrubbers for CMS, tail gas scrubber and emergency chlorine scrubber were provided to mitigate fugitive emissions |  |  |
| 6 | Necessary Authorization required under the hazardous and other wastes (Management and trans-Boundary movement) Rules, 2016, Solid Waste management Rules, 2016 shall be obtained and provisions contained in the rules shall be strictly adhered to.   | Complied | The unit obtained CFO vide order no. APPCB / KNL/ KNL/16322 / CFO& HWA/ HO/ 1987 valid till 28.02.2026.  |  |  |
| 7 | Total fresh water requirement shall not exceed 15167 cum/day to be met from Tungabhadra River through infiltration wells. Prior permission in this regard shall be obtained from the concerned regulatory authority/ CGWA.   | Complied | Presently the water consumption as per the quantity mentioned in CFO. We have obtained permission from Tungabhadra River for withdraw of 20 MLD of water.  |  |  |
| 8 | Process Effluent/any waste water shall not be allowed to   | Complied | Process effluent and wastewater  | N/A   |  |



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|    | mix with storm water. Storm water drain shall be passed through guard pond.  |          | streams are transfer to effluent collection tank with dedicated pipelines.   |   |  |
| 9  | Storage of raw materials shall be either stored in soils or in covered area to prevent dust pollution and other fugitive emissions.  | Complied | Raw Salts is stored under covered shed with concrete platform.   | N/A   |  |
| 10 | Continuous online (24x7) monitoring system for stack emission shall be installed for measurement of flue gasses discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For Online continuous monitoring of effluent, The unit shall install the web camera with night vision capability and the flow meters in the channel/drain carrying effluent within the premises. | Complied | Continuous online (24x7) monitoring system for stack emission was installed. Web camera with night vision and flow meters to effluent lines are provided and connected to SPCB/CPCB. |    |  |
| 11 | For the DG sets, emission limits and the stack height shall be in conformity with the exact regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.   | Complied | The DG sets have sufficient height stacks minimum of 10m height as per CPCB guidelines and silencers (Acoustic enclosure) are provided for the DG sets to mitigate noise levels.     | N/A   |  |
| 12 | Hazardous chemicals shall be stored in tanks, tank farms, carboys etc. Flame arresters shall be provided on tank farm, and solvent transfer through pumps.   | Complied | Hazardous chemicals stored in tanks, tank farms and drums. Flame arresters provided on tank farm and solvent transfer through pumps and pumps are connected to the earth pit         | N/A   |  |
| 13 | The green belt of at least 5-10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the state forest department.  | Complied | The green belt is developed in an area of 89.03 ha i.e., 58.42% of total area.   |  |  |
| 14 | The company shall strictly comply with the rules and guidelines under manufacture, Storage and import of hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All the transportation of Hazardous Chemicals Shall be as per the Motor Vehicle Act (MVA), 1989.   | Complied | Annual safety audit conducted during 2021 submitted the report to factories department and APPCB. HAZOP study of entire complex was  | N/A   |  |



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|    |   |                | carried out in 2021.<br>Quantitative Risk Assessment in 2022.  |   |  |
| 15 | Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.   | Complied       | Yearly health check-up are being conducted to all employees and records are being maintained. OHS center is equipped with a part-time doctor, supporting staff and facilities.                           |    |  |
| 16 | The Company shall Undertake the waste minimization measures as below i Metering and control of quantities of active ingredients to minimize waste ii Reuse of by-products from the process as raw materials or as raw material substitutes in other processes iii Use of automated filling to minimize spillage iv Use close feed system in to batch reactors v Venting equipment through vapor recovery system vi Use of high pressure hoses for equipment cleaning to reduce waste water generation | Complied       | Raw material quantities are controlled by analyzing process parameters to minimize waste. No batch process. Liquid RM are transferred through DCS control. Equipment's are being fitted with condensers. | N/A   |  |
| 17 | National emission standers for organic chemicals Manufacturing industry issued by the ministry vide G.S.R.608 (E) dated 21st July, 2010 and amended from time to time shall be followed.  | Being Complied | Installed online monitoring system for monitoring of emissions as per G.S.R.608 (E) dated 21st July, 2010 issued by Ministry   |  |  |
| 18 | Consent to Establish / Operate for the project shall be obtained from state pollution control board as required under the Air (Prevention and Control of Pollution) Act, 1981 and the water (Prevention and Control of Pollution) Act,1974  | Complied       | We have obtained the consent for establishment (Expansion), vide order no. APPCB/KNL/KNL/2 dated 25.05.2018 and CFO vide order no. APPCB / KNL/ KNL/16322 / CFO& HWA/ HO/ 1987valid till 2               |  |  |
| 19 | The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Firefighting system shall be as per norms.   | Complied       | Sufficient firefighting equipment's and fire hydrant system is being provided around the industry.   | N/A   |  |
| 20 | At least 2.5% of the total project cost shall be allocated for Enterprise social commitment based on the hearing issues and item-wise details along with time bound   | Being Complied | Item-wise details along with time bound action plan for CER shall be prepared and submitted to   | N/A   |  |

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|    | action plan shall be prepared and submitted to the ministry regional office.  |                | IRO. Rs. 191.8 Lakhs spent during 2018-2021 towards installation of drinking RO & Health Camps etc.  |     |  |
| 21 | All the commitments made regarding issues raised during the public hearing/consultation meeting held on 29t November, 2017 shall be satisfactorily implemented. | Being Complied | The major issues during PH are pertaining to local employment, drinking RO plants, CSR. Implemented ZLD system. Rs. 191.8 Lakhs spent during 2018-2021 towards installation of drinking RO, Health camps | N/A |  |

### 7. General Conditions (Proponent) :

| S.No | Condition   | Self Declaration | Remarks / Reason  | Supporting Documents  | Observation of IRO |
|------|---|------------------|---|---|--------------------|
| 1    | The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the ministry of environment, Forest and Climate change as well as 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. | Complied         | Rs. 35 crores were spent for implementation environment protection measures and to operate pollution control equipment and to monitoring the same continuously and recurring is about 10 crores/year. | N/A   |                    |
| 2    | The company shall Harvest rain water from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for the different industrial operations within the plant.   | Complied         | Rooftop rain water is collected to recharge the ground water.   | N/A   |                    |
| 3    | The ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.   | Agreed to Comply | Condition noted and same will be followed.  | N/A   |                    |
| 4    | A Separate environmental management cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental management and monitoring functions.   | Complied         | A separate environmental cell has been established. All equipment's and full-fledged laboratory facilities are available to carry out the environment and   |  |                    |

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|   |  |                | monitoring functions.   |   |  |
| 5 | The Environmental statement for each financial year ending 31st march in form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective regional offices of MoEF & CC by e-mail.          | Being Complied | Submitting regularly Environmental Statement to APPCB, Kurnool. Wwe will upload environmental statement in the company's web site along with status of compliance of EC                             |    |  |
| 6 | A copy of clearance letter shall be sent by the project proponent to the concerned Panchayat, Zila parisad/municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.   | Complied       | A copy of the Environmental Clearance letter had circulated to the Gondiparla Grama Panchayat, Kurnool Zilla Parishad, Municipal Corporation and Urban local body                                   | N/A   |  |
| 7 | Training shall be imparted to all employees on the safety health aspects of chemicals handling. Pre- employment and routine periodical medical examinations for all the employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.  | Complied       | Training is provided to employees on safety and health aspects of chemicals handling based on MSDS. Pre-employment checkup and annual health checkup is under taken for all employees.              | N/A   |  |
| 8 | The Company shall also comply with all the environmental protection measures and safeguards proposed in the documents submitted to the ministry. All the recommendations made in the EIA/EMP in respect of environment management, risk mitigation measures and public hearing shall be implemented.   | Complied       | All environmental protection measures as mentioned in EIA/EMP was implemented in respect of environment management, risk mitigation measures.   | N/A   |  |
| 9 | The project proponent shall inform the public that the project has been accorded environment clearance by the ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at the website of the ministry at <a href="http://moef.nic.in">http://moef.nic.in</a> . This shall be advertised within seven days from date of issue of the clearance letter, at least in two local newspaper that are widely circulated in the region | Complied       | Informed the public that our industry has been accorded environmental clearance by the MoEF&CC through two newspapers. (The New Indian Express dated 08.05.2018 and Andhra Prabha dated 06.05.2018. |  |  |

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|    | of which one shall be in the vernacular language of the locality concerned   |                  |   |   |  |
| 10 | The above conditions will be enforced, inter-alia under the provisions of the water (prevention and control of pollution) Act, 1974, The Air (prevention and control of water pollution) Act, 1981, the environment (Protection) Act, 1986, the hazardous waste (management, handling and Trans-boundary Movement) Rules, 2016 and the public liability insurance Act, 1991, read with subsequent amendments therein.  | Complied         | The unit is under operation vide valid CFO order no. APPCB / KNL/ KNL/16322 / CFO& HWA/ HO/ 1987valid till 28.02.2026. Public liability insurance obtained. Copy enclosed                               |    |  |
| 11 | The locations of ambient air quality monitoring station shall be decided in consultation with the state pollution control board (SPCB) 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.   | Complied         | Installed 3 Nos of AAQ Monitoring Stations in consultation with the SPCB. Out of 3 Nos, one station was in up wind and another station in down wind direction where maximum ground level concentration. | N/A   |  |
| 12 | The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental clearance conditions including results of monitored data (both in the hard copies as well as in the e-mail) to the respective Regional office of MoEF & CC, the respective zonal office of CPCB and SPCB. A Copy of Environmental clearance and six-monthly compliance status reports shall be posted on the website of the company. | Complied         | Submitted six months progress reports to the Ministry of Environment, Forest & Climate change, Regional Office over Parivesh Portal A copy of Environmental Clearance letter and six-monthly compliance | N/A   |  |
| 13 | The project authorities must strictly adhere to the stipulations made by the state pollution control board (SPCB), State government and /or any other statutory authority.   | Complied         | Presently plant is under operation vide valid CFO obtained vide order no. APPCB / KNL/ KNL/16322 / CFO& HWA/ HO/ 1987valid till 28.02.2026.   | N/A   |  |
| 14 | The National Ambient Air Quality Standards issued by the ministry vide. G.S.R. No. 826(E) dated 16th November, 2009 shall be complied with.  | Complied         | Installed continuous Ambient Air Quality monitoring station and results are found to be within the NAAQ standards.  |  |  |
| 15 | The ministry may revoke or suspend the clearance, if implementation of any of the  | Agreed to Comply | Condition Noted   | N/A   |  |

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|    | above conditions is not found to be satisfactory.   |                  |   |     |  |
| 16 | The company shall undertake all measures for improving socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villagers, administration and other stakeholders. Also eco-developmental measures shall be undertaken for overall improvement of the environment.   | Complied         | We are undertaking socio-economic development activities in the surrounding villages. CSR activities are carried out as per the advice of local administration including District Collector and Magistr | N/A |  |
| 17 | No further expansion or modifications in the plant shall be carried out without prior approval of the ministry. In case of deviations are alterations in the project proposal from those submitted to this ministry, a fresh reference shall be made to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.                                 | Agreed to Comply | No expansion or modifications are carried out without prior approval of the Ministry of Environment Forest and climate change.  | N/A |  |
| 18 | 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 the sources of the noise generation. The ambient noise levels shall conform to the standards prescribed under environment (Protection) Act, 1986 rules, 1989 viz. 75 d BA (day time) and 70 dBA (night time). | Complied         | The ambient noise levels in and around the plant area are being monitored on monthly basis through authorized third party and the values are within the limit.  | N/A |  |

**\*\*Note : N/A - Not Available**

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