Annexure-E COMPLIANCE REPORT OF ENVIRONMENTAL CLEARANCES

[Compliance Period: April 2019 to March 2020]



COMPLIANCE REPORT OF ENVIRONMENTAL CLEARANCE

Project: Expansion of existing and new synthetic Organic Chemicals

Manufacturing Facility at Block 133 (P), Village Samlaya, Taluka Savli, District Vadodara, Gujarat, India by JUBILANT LIFE SCIENCES

LIMITED.

Reference: MoEF LETTER NO. . J-11011/241/2011-IA II (I) DTD. 11th Aug 2014

Products: Various Synthetic organic chemicals

S. No.	Product Falling under one group	Name of the Product	Existing Production as per GPCB Consent MTPM	Proposed Additional Production, MTPM	Total Proposed Production after Expansion, MTPM
		EC Prod	ucts		
1	Ethoxylate of Nonyl phenol, Fatty Acid Fatty Alcohol, DEG	Ethoxylate of Nonyl phenol, Fatty Acid Fatty Alcohol, DEG & Castor oil	200.00	0.00	
2	& Castor oil, Choline chloride & derivatives	Liquid Choline Chloride 75%	667.00	1333.00	
3	(Aqueous Choline	Acidifier Liquid	40.00	460.00	
4	Chloride, Acidifier Liquid, Chloromequate Chloride (Choline Dichloride), Ethoxylate PCL ₃	Chloromequate Chloride (Choline Dichloride) 50% to 67.5%	150.00	450.00	3400.00
5	(Triss), Choline Chloride Crystals	Ethoxylates PCl3 (Triss)	10.00	40.00	
6	etc.	Choline Chloride Crystals	0	50	
7	Betaine	Betaine	0	500	500.00
8	2 - Vinyl Pyridine	2 - Vinyl Pyridine	0	500	500.00
	Total for EC Pro	duct	1067	3333	4400

S. No.	Product Falling under one group	Name of the Product	Existing Production as per GPCB Consent MTPM	Proposed Additional Production, MTPM	Total Proposed Production after Expansion, MTPM
		Non E	C Product		
9	Choline chloride Dry, (Dry	Dry Choline Chloride	833	1167	
10	Choline chloride, Acidifier Dry,	Acidifier (Dry Base)	50	450	3000
11	Silica based dry choline etc.	Silica 50%	0	500	
12		Animal Feed - Premix	416	834	
13		Feed Emulsifier Ethoxylates of Castor oil	0	400	
14	Premix (Animal Feed - Premix, Feed Emulsifier	Feed Emulsifier lysolecithin	0	400	
15	Ethoxylates of Castor oil, Liquid Formulations	Chelated minerals for feed and food applications	0	500	3550
16	and tonics etc.	Liquid Formulations and tonics	0	500	
17		Encapsulated products for livestock, poultry and swine	0	500	
18	Carrier	Corn Cob Carrier	333	517	850
19	EOCO ₂ (Ethylen e Oxide & Carbon Dioxide)	EOCO ₂ (Ethyle ne Oxide & Carbon Dioxide)	150	150	300
20	Oil Field Chemicals	Oil Field Chemicals	120	0	120
	Total Non EC F	Product	1902	5918	7820
	Total		2969	9251	12220

During the stated compliance period, we have obtained NOC vide Order No. 54431 Ref. No. GPCB/CCA-VRD-267(6)/ID:22119/161629 dated 03.10.2013 and Amd. 54431 Ref. No. GPCB/CCA-VRD-267(7)/ID:22119/32184 valid up to 07.10.2017.

Detail of Production during the compliance period is enclosed as Annexure-A.

Period : APRIL 2019 TO MARCH 20

♥ COMPLIANCE REPORT OF CTE AMENDMENT, ORDER NO. 54431, DATED 03/10/2013

Sr.			Compliance				
No.				Status			
	read 138, 206, Vado	rst paragraph ac as Plot No. 13 207, 208, 129, 144, 203, 14 odara	136, 137, 202, 204, Savli, Dist	Noted			
	Prod	duct list mention w:	oned in CTE sh	all be rep	olaced and	d read as	Complied
	Sr N o.	Products falling under one group	Products	Earlier Quantity (TPM)	Additional Quantity (TPM)	Total Quantity (TPM)	
	>	EC Products :					
	1	Ethoxylate of Nonyl phenol, Fatty Acid Fatty Alcohol, DEG& Castor oil, Choline	Ethoxylate of Nonyl phenol, Fatty Acid Fatty Alcohol, DEG& Castor oil	200.00	0.00		
	2	chloride & derivatives (Aqueous	Liquid Choline Chloride 75%	667.00	1333.00		
	3	Choline	Acidifier Liquid	40.00	460.00		
	4	Chloride, Acidifier Liquid, Chloromequate Chloride (Choline	Chloromequate Chloride (Choline Dichloride) 50% to 67.5%	150.00	450.00	3400.00	
	5	Dichloride), Ethoxylate PCL ₃ (Triss),	Ethoxylates PCl3 (Triss)	10.00	40.00		
	6	Choline Chloride Crystals etc.	Choline Chloride Crystals	0.00	50.00		
	7	Betaine	Betaine	0.00	500.00	500.00	

Sr. No.		Compliance Status					
	8	2 - Vinyl Pyridine	2 - Vinyl Pyridine	0.00	500.00	500.00	
		Tota	I for EC Products	1067.0 0	3333. 00	4400 .00	
	>	Non EC Products					
	9	Choline chloride Dry,	Dry Choline Chloride	833.00	1167.00		
	10	(Dry Choline chloride, Acidifier Dry,	Acidifier (Dry Base)	50.00	450.00	3000.00	
	11	Silica based dry Choline etc.	Silica based dry Choline	0.00	500.00		
	12	Premix (Animal	Animal Feed – Premix	416.00	834.00		
	13	Feed - Premix, Feed Emulsifier Ethoxylates of Castor oil, Feed Emulsifier lysolecithin	Feed Emulsifier Ethoxylates of Castor oil	0.00	400.00		
	14		Feed Emulsifier lysolecithin	0.00	400.00		
	15	,Chelated minerals for feed and food applications, Liquid	Chelated minerals for feed and food applications	0.00	500.00	3550.00	
	16	Formulations and tonics, Encapsulated	Liquid Formulations and tonics	0.00	500.00		
	products for livestock, 17 poultry and swine ,etc.	Encapsulated products for livestock, poultry and swine	0.00	500.00			
	18	Carrier	Corn Cob Carrier	333.00	517.00	850.00	
	19	EOCO ₂ (Ethyle ne Oxide & Carbon Dioxide)	EOCO ₂ (Ethyle ne Oxide & Carbon Dioxide)	150.00	150.00	300.00	

Sr. No.	Consent Conditions									Compliar Status			
	20 -			Oil F Cher	ield micals			120		0	120		
			Total for No	n- E	C Produ	ucts	1902	2.00	5918.0	00	7820.00		
					Gross T			969	925		12220		
	shall	comp	ing conditionly with the book J-11011/2	term	s and	cond	itions	stipu	ulated b	yΛ			
	The o		ion no. 1 ur	nder	the Air	Act	is am	ende	d for ac	ddit	ion of fuel	Comp	lied
		No.	Fuel		Qua	_							
		1	HSD		2060	-			1 197		1.0	6	I:I
	emiss		No. 2 under and flue									Comp	lied
	Sr. No.	Stac	k attached to		Stack eight	AP	PCM	Par	ameter	Р	ermissible limits		
	3	(200	set (1 No.) 0 KVA) nd by)	3	30 m	aco	/ith oustic stem	PM,	SO2,N		0 g/Nm3,100 m,50 ppm		
6			ing conditions under the			ded	as C	ondit	ion no.	9	under the	Comp	lied
			andard: The all confirm t		_		sion t	hrou	gh stac	k a	ttached to		
)**0.5	ninimum he 5 H = Stack										
	(b) N	oise f	rom DG sha	all be	e contre	olled	by ac	oust	ics in th	e r	oom		
	(b) Noise from DG shall be controlled by acoustics in the room (c) The acoustic enclosure or acoustic treatment of the shall be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards whichever is on the higher side The measurement for insertion loss may be done at different points at 0.5 m from the acoustic enclosure/room and the averaged												
	. ,		G set shall ss of minim				th pro	per	exhaus	t m	nuffler with		
	ĎĞ s	et ou	rts shall be tside the pr sitting and c	emis	ses wit	hin th	ne am						
	(f) In	stalla	tion of DG	set	must	be s	strictly	ı in (complia	nce	e with the		

Sr. No.		Consent Conditions								
	recomn	nendations of th	e DG Se	t manufactı	ıre					
		roper routine ar should be set a	•		enance prod	edure for the				
7	gas en	ional process tors ,process the following	Complied							
	Stack no	Stack attached to	Stack height (m)	APCM	Parameter	Permissible limit				
	1.	Combined stack attached to 3 nos. Of blowers	13	Cyclone separator ,bag filter and dust collector						
	2.	Universal Grinder-1 (Premix Plant)	9	Cyclone separator ,bag filter	PM	150 mg / Nm3				
	3.	Dry Exhaust Air (Dry Plant existing)	9	Multi Cyclone Separator						
	4.	Dry Exhaust Air (Dry Plant proposed)	9	Multi Cyclone Separator						

EC COMPLIANCE REPORT OF GRANTED LETTER F. NO. J- 11011/241/2011- IA

II(I), DATED 11/08/2014

Sr.	EC CONDITION	COMPLIANCE
No.	EC CONDITION	STATUS
Α	Specific condition	
I	National emission standard for organic chemicals manufacturing industry issued by the Ministry vide G.S.R. 608(E) dated 21 st July, 2010 and amended time to time shall be followed by the unit.	Noted & Agreed
li	Bag filter along with stack of adequate height shall be provided dust / agro waste fired boiler as per GPCB guideline	Complying (Ventury scrubber is working efficiently)
lii	Ambient air quality data shall be collected as per NAAQES, standards notified by the Ministry vide G.S.R. No. 826 (E) dated 16 th September, 2009. The levels of PM ₁₀ , SO ₂ , NO _x , CO and VOC shall be monitored in the ambient air 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, the respective Zonal office of CPCB and Gujarat Pollution Control Board (GPCB).	Noted & Complying
Iv	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 & 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 GPCB.	Noted & Complying
V	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.	Complying
Vi	Total fresh water requirement from ground water source shall not exceed 355.2m³/day and prior permission shall be obtained from the CGWA.	Complying (Permission is obtained from CGWA, New Delhi)

\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		0
Vii	Industrial effluent shall not exceed 80m³/day. Industrial effluent will be treated in ETP and treated effluent shall be discharged to CETP after conforming to the standards prescribed for the effluent discharge and obtaining permission from the GPCB. No process effluent shall be discharged in and around the project site. Water quality of treated effluent from ETP shall be monitored regularly.	Complying
Viii	Treated effluent shall be passed through guard pond. Online Ph meter, flow meter and TOC analyzer to be installed	Online pH, TSS, BOD, COD, meter, and flow meter installed.
lx	Process effluent /any waste water shall not be allowed to mix with storm water and storm water drain shall be passed through guard pond	Noted & Complying
X	Solvent management shall be as follows	Not Applicable
V	 a) Reactor shall be connected to chilled brine condenser system b) Reactor and solvent handling pump shall have mechanical seal to prevent leakage c) The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery d) Solvents shall be stored in a separate space specified with all safety measures. e) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done f) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. g) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation. 	Company
Xi	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be by pumps.	Complying
Xii	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.	Complying
Xiii	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All Transportation of Hazardous Chemicals shall be as per fhe Motor Vehicle Act (MVA), 1989.	Noted & Agreed
xiv	The company shall undertake following waste minimization measures	Complying
	a) Metering and control of quantities of active ingredients to minimize waste.	

Xv	 b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. c) Use of automated filling to minimize spillage. d) Use of Close Feed system into batch reactors. e) Venting equipment through vapor recovery system. f) Use of high pressure hoses for equipment clearing to reduce wastewater generation. 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 	Complying
	norms.	
Xvi	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. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Noted & Complying
Xvii	Green belt shall be developed at least in 33 % of the plant area in and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Selection of plant species shall be as per the CPCB guidelines.	Complied
Xviii	The company shall comply with the recommendations made in the EIA-EMP/Risk assessment report. Risk assessment shall be included in the safety Manual.	Complied
Xix	All the commitments made to the public during public hearing/public consultation meeting held on 16 th May, 2012 shall be satisfactorily implemented and adequate budget provision shall be made accordingly.	Complied
Xx	At least 5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on earlier Public Hearing Issues, locals need and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program shall be ensured accordingly in a time bound manner.	complied
xxi	The Company shall submit within three months their policy towards Corporate Environment Responsibility which shall inter-alia address (i) Standard operating process/procedure to being into focus any infringement/deviation/ violation of environmental or forest norms/conditions, (ii) Hierarchical system or Administrative order of the Company to deal with environmental issues and ensuring compliance to the environmental clearance conditions and (Hi) System of reporting of non compliance/violation environmental norms to the Board of Directors of the company and/or stakeholders or	Complied

		<u> </u>
	shareholders.	
Xxii	Provision shall be made for the housing for the construction labor within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, 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.	Noted & Agreed

В	General condition	
I	The project authorities shall strictly adhere to the stipulations made by the Gujarat Pollution Control Board.	Noted & Complying
li	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests, in <i>case</i> 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.	Noted & Agreed
lii	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one stations is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	Complied
Iv	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 d8A (day time) and 70 dBA (night time).	Noted & Complying
V	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.	Complying
Vi	Usage of Personnel Protection Equipments (PPEs) by all employees/ workers shall be ensured.	Noted & Complying
Vii	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 environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.	Noted & Complying
Viii	The company shall undertake al! relevant measures for improving the socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administration.	Noted & Agreed
lx	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Noted

Χ	A separate Environmental Management Cell equipped with	Complied
	full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions	
Xi	As proposed, the company shall earmark sufficient funds towards capital cost and 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.	Agreed
Xii	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 suggestions/ representations, if any, were received while processing the proposal.	Complied
Xiii	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the Gujarat Pollution Control Board. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.	Noted & Complying
Xiv	The environmental statement for each financial year ending 31 ^{sl} 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 by e-mail.	Noted & Complying
Xv	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 www.moef.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.	Complied

Xvi	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.	Complied
	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted & Agreed
	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Noted & Agreed
	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Noted & Agreed

LIST OF ANNEXURES

Annexure No.	Contents	
Annexure-A	Detail of Productions.	
Annexure-B	Stack Monitoring Reports	
Annexure-C	Work Area Monitoring Reports	
Annexure-D	Ambient Air Monitoring Reports	
Annexure-E	Noise Monitoring Reports	
Annexure-F	Copy of PLI Policy	

Annexure-A Production details in year 2019-20

Sr. No.		Products	Consent Quantity (TPM)	Quantity (TPM)
1	Ethoxylate of Nonyl phenol, Fatty Acid Fatty Alcohol, DEG& Castor oil, Choline chloride& derivatives (Aqueous Choline Chloride), Acidifier Liquid, Chloromequate Chloride (Choline Dichloride), Ethoxylate PCL3 (Triss), Choline Chloride Crystals etc.	Ethoxylateof Nonyl Phenol	1700	1053.02
		Fatty Acid Fatty Alcohol		
		DEG & Castor Oil		
		Choline Choliride & Derivatives (Aq. Choline Chloride)		
		Acidifier Liquid		
		Chloromequate Chloride (Choline Dichloride)		
		Ethoxylated PCI 3 (Triss)		
		Choline Choliride crystal etc		
2	Betain	Betain	500	0
3	Choline chloride Dry, (Dry Choline chloride), Acidifier Dry, Silica based dry choline etc.	Dry Choline Chloride	2440	1204
		Acidifier Dry		
		Silica Based Dry Choline etc.		
4	Premix (Animal Feed – Premix), Feed Emulsifier Ethoxylates of Castor oil, Feed Emulsifier lysolecithin ,Chelated minerals for feed and food applications, Liquid Formulations and tonics, Encapsulated products for livestock, poultry and swine ,etc.	Premix (Animal Feed - Premix etc	3550	131
		Feed Emulsifier Ethoxylates of Castor Oil,		
		Feed Emulsifier Lysolecithin		
		Chelated Minerals for Feed and food Application		
		Liquid Formulation and Tonic		
		Encapsulated Products for Live Stock		
5	Carrier	Carrier	850	335
6	EOCO2 (Ethylene Oxide and Carbon Dioxide mixture)	EOCO2 (Ethylene Oxide and Carbon Dioxide mixture)	300	28
7	Oil Field Chemicals	Oil Field Chemicals	120	0
	Total	Total	9460	2075

June 20th, 2020

Reference: JLSL / EHS/ GPCB/ 19-20/04

To,
The Director,
Ministry of Environment, Forests & Climate Change
Regional Office (Western Region)
Kendriya Paryavaran Bhavan,
Link Road No.3, E-5, Ravi Shankar Nagar,
Bhopal - 462 016 (M.P.)

Subject: Submission of EC compliance report

Dear Sir,

Please find enclosed herewith compliance report of Environmental Clearance of our unit for the year 2019–20 for your office record.

All information provided/submitted herewith is commercial confidential data/information, trade secrets and/or intellectual property(s) etc. of the Company or its group Companies. The Company humbly requests you to treat the data/information submitted herewith as "Strictly Confidential", and not to provide/disclose/share any data/information to any third person/party as the same is exempted from disclosure under Section 8 of the Right to Information Act, 2005 ("RTI Act"). In the event of any person makes any application to you seeking any information about the Company, the Company requests you to please issue a prior written notice to the Company along with reasonable opportunity of representation to the Company as envisaged under Section 11(1) of the RTI Act. No disclosure of any data/information can be made to any third person/party without Company's consent under the provisions of the RTI Act.

Thanking you,

Yours truly
For JUBILANT LIFE SCIENCES LIMITED

Authorized Signatory Gurish Khosla Unit Head Encl: EC Compliance report