

SARACA LABORATORIES LIMITED

ENVIRONMENT CLEARANCE CONDITION WISE COMPLIANCE REPORT

No.: SEIAA/TS/MDK-38/2015-501, dated: 20:05:2016.

(November-2017 - April-2018)

S.NO	CONDITION	Status of Compliance
A	SPECIFIC CONDITIONS	
	Air Pollution	
I	The emissions from the Coal fired Boilers of capacity 10 TPH (existing) 6 TPH (existing) & 20 TPH (proposed) shall be routed through bag filters /ESP followed by stacks of height 30 m, 30 m & 40 m respectively. The concentration of particulates in the emission shall not exceed 115 mg/Nm ³ . Sampling Port with removable dummy of not less than 15 cm diameter in the stack at a distance of 8 times the diameter of the stack from the nearest constraint such as bends etc, shall be provided to monitor stack emissions. Stacks of adequate height shall be provided for proposed D.G. Sets of capacity 2 x 750 kVA & 1 x 1000 kVA as per CPCB norms.	Complied. The emissions from the Coal fired Boilers of capacity 10 TPH, 6 TPH & 20 TPH are routed through bag filters / ESP followed by stacks of height 30 m, 30 m & 40 m respectively. Stack emissions are being monitored on quarterly basis through authorized agency and monitored values are well within the limit. Recent monitoring reports attached as Annexure: 01. Sampling Ports are provided as per the norms. Stacks of adequate height are provided for D.G. Sets as per CPCB norms.
II	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.	Agreed upon. We assure you that the conditions is "Noted" and we shall abide by the condition.
III	The process emissions containing HBr & HCl shall be routed through multi stage scrubber system. Scrubbed liquid shall be treated and reused or subjected to MEE. The process emissions containing derivatives of CO ₂ shall be dispersed into the atmosphere. The industry shall also provide online pH monitoring system for scrubber. The industry shall meet the emission standards notified by the MoEF.	Complied. All the process emissions are routed through multi stage scrubbing system and further scrubbed liquid is being treated in the ZLD facilities. Monitoring of gaseous emissions and particulate matter from various process units being carried out on quarterly basis through third party laboratory and the monitored values are within the limit and the reports are being maintained. We have provided online pH meters for scrubbers.
IV	Necessary measures shall be taken to control odour as far as possible. Chillers (brine solution) shall be installed to reduce solvent evaporation losses into the atmosphere. All the solvent storage tanks shall be connected to vent condensers. Regular monitoring of the VOCs shall be carried out using sensors.	Complied. As informed the unit has taken necessary measures to control odour by carrying all operations in a closed system. Reactor vents are connected with secondary condensers with Brine circulation. Scrubbing systems has been provided to neutralize the acidic fumes. Solvent storage tanks are connected with vent condensers. VOC values at solvent storage tanks, distribution and process area across the plant is being monitored using portable VOC meter. We have also installed an online TVOC monitor and connected the same to the State PCB server. Recent monitoring reports attached as Annexure: 02.
V	The industry shall manufacture only I, II, III B & IV stages in Ranitidine. The condensation reaction in III A stage of manufacturing process of Ranitidine shall not be carried out in the project under any circumstances as it generates Methyl Mercaptan and also as committed by the proponent during presentation	Complied. As informed the condensation reaction III A stage manufacturing has been shifted to our unit ² which is located at Boyapalem (V), Srikakulam (Dt), AP.

VI	The solvents shall be recovered by installing fractional distillation columns. The recovered solvents shall be reused in the process or sold to recyclers authorized by TSPCB. The volatile vapours generated during process shall be routed through condensers and the Condensate shall be reused in the plant.	Complied. Dedicated solvent recovery Plant has been installed for recovering the solvent. Recovered solvents are re-used in the process to the extent possible. Process operations are being carried out in closed system and reactor vents are connected with primary and secondary condensers to control the process emissions.
VII	As proposed, green belt of Ac. 2.72 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 roadsides etc., Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO.	Complied. We have developed 2.72 acres as green belt within the plant premises. During every monsoon season we are arranging for more plantations for increasing the Green Belt during the past four years, we have developed greenbelt comprising of around 1300 saplings in an area of around 1.0 ha. Survival rate of the plants is about 70%.
VIII	Raw materials shall be transported in covered trucks. Raw materials shall be stored under sheds. All the belt conveyors shall be covered with G.I. sheets. Appropriate dust suppression system shall be provided all around the stockpiles and conveyor system. All the roads in the plant area shall be asphalted / concreted and water shall be sprinkled to suppress the dust.	Complied Dedicated Raw material storage facilities are provided and raw materials are being transported through dedicated closed/ covered trucks only. Dust suppression system is in place. Internal roads within the plant are concreted. All the belt conveyors are covered with G.I sheet. Dust extraction system with bag filters is provided for the coal handling system and water spraying around the stockpiles is arranged to minimize the dust problem.
IX	Ambient air quality including ambient noise levels must not exceed the standards stipulated under notification dt. 16.11.2009 issued by the MoEF & CC, Gol. Monitoring of ambient air quality and stack emissions shall be carried out regularly in consultation with TSPCB	Complied We have installed an on-line TVOC meter and connected it to the server of Telangana state PCB. For other parameters of ambient air quality previously we were monitoring through third party in 2 locations on quarterly basis (parameters of PM10, PM2.5 , SOx & NOx). Now we have increased the no. of locations to 3 as per protocols prescribed by the CPCB. Copies of the same is enclosed as per Annexure no.03
	B) Water Pollution	
I	The source of water is met from private suppliers through tankers. The total water requirement after expansion shall not exceed 325.98 KLD. Quantity of water used for: Process is 20.98 KLD; Reactor & Floor washings is 5.0 KLD; Boiler make-up is 55.0 KLD; Cooling tower makeup is 170.0 KLD; Softener/DM Plant 3.0 KLD; Scrubber is 4.0 KLD; Domestic purposes is 18.0 KLD & Gardening is 50.0 KLD.	Complied. Water requirement for the project is sourced from private tankers and not drawing any ground water within the unit. We have also arranged to harvest rainwater collection systems The water consumption in the plant is well within the limits as per the CFO.
II	The total wastewater generated after expansion shall not exceed 60.1 KLD. Out of that, 26.1KLD is from Process; 5.0 KLD is from Reactor & Floor washings; 3.0 KLD is from Boiler blowdown; 4.0 KLD is from cooling tower bleed of; 3.0 KLD is from Softener/DM Plant rejects; 4.0 KLD is from Scrubber; 15.0 KLD is from Domestic section.	Complied. Average wastewater generation is 35 KLD. Out of that, 10 KLD is from Process; 3 KLD is from Reactor & Floor washings; 3 KLD is from Boiler blowdown; 4 KLD is from cooling tower bleed of; 3KLD is from Softener/OM Plant rejects; 4 KLD is from Scrubber; 8 KLD is from Domestic section. The effluents generation is well within the limits as per the CFO.

III	The high TDS and low TDS effluents generated from the process are to be separated and treated separately. The high TDS effluents shall be disposed into stripper followed by MEE and ATFD. The condensate shall be reused in cooling towers after necessary treatment. The LTDS effluents shall be treated in an ETP followed by RO system. The permeate is to be re-used in the plant and rejects are to be sent to MEE system. The treated effluents shall be recycled completely. The project proponent shall achieve Zero Liquid Discharge and in no case the effluent shall be discharged outside the factory premises. The volatile organics shall be sent to recyclers authorized by TSPCB.	Complied. We have setup zero liquid discharge (ZLD) facilities and the entire effluents are being treated in ZLD facilities installed. We stopped sending the effluents to the CETP since March 2017. High TDS & Low TDS streams are segregated. High TDS effluents are subjected to stripper followed by MEE and Agitated Thin Film Dryer (ATFD). Salts are being sent to TSDF. LTDS effluents are subjected to the biological treatment followed by RO system. Condensate from MEE and ATFD is being treated in biological system along with Low TDS effluents. RO reject is being treated in MEE. RO Permeate is recycled and used in the utilities. Domestic wastewater is being treated along with LTDS effluents.
IV	The proponent shall complete the erection of ZLD facilities before starting the expansion activities, as committed by the proponent vide Ir.dt.09.03.2016	Complied. We have established ZLD facilities and is being operated since Feb- 2017.
V	The proponent shall provide separate storm water drains and harvest the rainwater from the rooftops to recharge the groundwater.	Complied. We have constructed two numbers of rain water collecting sumps on the north west and north east corners of the plant and arranged pumping system with submersible pumps to pump the collected rain water to an above ground RCC storage tank of 200 KL capacity. Also we have arranged for collection of rainwater directly from rooftops.
VI	Automatic/ online monitoring system (24 x 7 monitoring devices) for flow measurement and relevant pollutants in the treatment system to be installed. The data to be made available to the respective SPCB and in the Industry's website.	Complied. We have installed online flow meters and connected to the servers of CPCB TSPCB.
VII	The industry shall install IP Camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability and flow meters in the channel / drain provided for carrying the effluent from within the premises of the unit.	Complied. The unit has installed IP camera and Flow meter at the outlet of the ZLD and the same is linked to the server of State PCB and CPCB.
	C. Solid Waste :	
I	Hazardous waste generated from the industry such as waste oils, used oils etc., shall be disposed as per the Hazardous Wastes (Management, Handling, and Transboundary movement) Rules, 2008 and its amendments thereof to the recyclers authorized by TSPCB.	Being complied. As informed waste oils generated from the Unit is being disposed to the TSPCB authorized recyclers. All the inorganic solid wastes are being sent to RAMKY for land filling and Organic waste and spent carbon are being sent to Cement Industries for use as alternate fuel.
II	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MV A), 1989.	Being complied. The rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules. 1989 as amended in October, 1994 and January, 2000 is being complied. Prior approval from Chief Controller of Explosives, PESO has been obtained vide licence No.P/HQ/AP/15/1502(P18638) dated 21/12/2012, which is valid till 31/12/2022.
III	The proponent shall comply with the following w.r.t solid waste generated after expansion:	Complied. As informed, quantities of solid waste generated are within the prescribed limit. The hazardous wastes generated are being disposed to TSDF and cement units.

S. No	Description	Quantity	Mode of Disposal
1.	Process organic residue	77.05 TPM	Sent to TSDF/Cement plants for Co-incineration.
2.	Off specification raw material/products	2.0 TPM	
3.	Spent Carbon	3.25 TPM	
4.	Stripper waste	147.42 TPM	Cement plants for Co-incineration.
5.	Sludge from wastewater pre-treatment	5.4 TPM	Sent to TSDF
6.	Forced Evaporation salts	221.27 TPM	
7.	Process inorganic salts	323.07 TPM	
8.	Mixed spent solvents	1467.0 TPM	Sent to authorized recovery units after distillation
9.	Ash from Boiler	32.0 TPD	Sold to Brick manufacturers
10.	Detoxified containers & container liners	800 No/month	Sold to authorized vendors after detoxification
11.	Used glass bottles from laboratories	0.5 TPM	Send to authorized recyclers after detoxification
12.	Used oil/Waste lubricating oil	1000 LPA	Sent to authorized recyclers
13.	Used lead acid batteries	10 No/Annum	Returned back to dealer/supplier

S.NO	CONDITION	Status of Compliance
B	General Conditions:	
I	This order is valid for a period of 7 years.	We have noted this condition and shall abide by the same.
II	"Consent for Establishment" shall be obtained from Telangana State Pollution Control Board under Air and Water Act before the start of any activity / construction work at site.	Complied with. Consent for Establishment was obtained from TSPCB vide Order No. 02/TSPCB/CFE/RO-RCP-II/H0/2016-2284 dated 25/11/2016.
III	This order is issued subject to outcome of the cases (if any), pending in the National Green Tribunal, Southern Zone, Chennai or in any other court.	We have noted this condition and shall abide by the same.
IV	The industry shall not manufacture any other products and exceeding capacities except those mentioned in this order, without permission.	We have noted this condition and shall abide by the same.
V	The proponent shall shift the industry whenever the Government directs the polluting industries and non-polluting industries from within the Outer Ring Road (ORR) to outside ORR, as committed by the proponent.	Complied Our unit is located outside the ORR.
VI	Provision shall be made for the housing of the construction labour within the site with all necessary infrastructures and facilities such as safe drinking water, fuel for cooking, mobile toilets, mobile STP, medical health care, creche etc., The housing may be in the form of temporary structures to be removed after the completion of the project. The safe disposal of wastewater and solid wastes generated during the construction phase should be ensured.	This condition is not applicable, since the unit is existing one.
VII	No change in the process technology and scope of working should be made without prior approval of the SEIAA, TS. No further expansion or modifications in the plant shall be carried out without prior approval of the SEIAA, TS/ MoEF&CC, GoI, New Delhi, as applicable.	We have noted this condition and shall abide by the same.
VIII	The environment safeguards contained in the EIA Report should be implemented in letter and spirit. The responsibility of implementation of environmental safeguards rests fully with the proponent ie., M/s. Saraca Laboratories Ltd.	Complied Mitigation measures mentioned in environmental management plan of EIA report have implemented effectively and the same is implemented with true spirit in operation phase also.

IX	All the conditions, liabilities and legal provisions contained in the EC shall be equally applicable to the successor management of the project in the event of the project proponent transferring the ownership, maintenance of management of the project to any other entity.	We have noted this condition and shall abide by the same.
X	The proponent shall submit half-yearly compliance reports in respect of the terms and conditions stipulated in this order in hard and soft copies to the SEIAA; and CCF, Regional office of MoEF & CC, Gol, Chennai on 1st June and 1st December of each calendar year.	We had submitted previous half yearly compliance report during the month of October 2017. Six monthly compliance reports along with monitoring data for the period November -2017 to April-2018 of are being submitted along with this compliance by hard and soft copy. Also we will regularly upload the six monthly compliance reports on our website.
XI	Four ambient air quality-monitoring stations should be established in the core zone as well as in the buffer zone for RSPM, SPM, PM10, PM2.5, SO2, NOx monitoring. Location of the stations should be decided based on the meteorological data, topographical features and environmentally and ecologically sensitive targets and frequency of monitoring should be undertaken in consultation With the State Pollution Control Board.	Complied. We have installed an on-line TVOC meter and connected it to the server of Telangana state PCB. For other parameters of ambient air quality previously we were monitoring through third party in 2 locations on quarterly basis (parameters of PM10, PM2.5 , SOx & NOx). Now we have increased the no. of locations to 3 as per protocols prescribed by the CPCB. Copy of the same is enclosed as Annexure.03
XII	Data on ambient air quality (RSPM, SPM, PM10, PM2.s, SO2, NOx) should be regularly submitted to the Ministry including its Regional Office located at Chennai and the State Pollution Control Board/ Central Pollution Control Board once in six months.	It is being followed. Ambient air quality is being monitored on regular basis. Regularly monitoring data is submitted to the Regional Office of MoEF&CC.
XIII	Usage of Personnel Protection Equipments by all employees / workers shall be ensured.	Being complied. Personnel Protective Equipments are provided to the employees/workers and are being in use during the process operations.
XIV	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.	Complied. As informed, regular training on safety and health aspects of chemicals handling has been provided to the employees. Pre- employment medical examinations and occupational health surveillance for the workers is being carried out once in a year and the records are being maintained.
XV	Occupational health surveillance program of the workers should be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.	Being complied. Occupational health surveillance for the workers is being carried out once in a year and the records are being maintained.
XVI	The Industry shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.	Being complied. The unit has placed dedicated fire protection/ suppression systems for entire plant.
XVII	A separate environmental management cell with suitable qualified personnel should be set up under the control of a Senior Executive, who will report directly to the Head of the Organization.	Being complied. Dedicated Environment management cell has been setup with suitable qualified personnel to take care of environmental related functions.

XVIII	The funds earmarked for environmental protection measures (Capital cost of Rs. 5.0 Crores and Recurring cost of Rs. 4.62 Crores per annum) & also the funds earmarked for Corporate Social Responsibility (CSR) activities, should be kept in separate account and should not be diverted for other purpose. Year wise expenditure should be reported to the SEIAA, Ministry and its Regional Office located at Chennai.	Complied. So far we have invested Rs. 4.7 Cr. In environment protection measures. We have CSR Policy and actions are being taken-up accordingly. Following are the list of contributions made by us towards CSR activities. <ol style="list-style-type: none"> 1. Contributions are made to the district collector and the State PCB for their community development funds. 2. Wages paid to the contractual staff of panchayat school. 3. Payments made to the Model industrial association towards the environment improvement activities in the Ida. 4. Furniture supplied to the local village school. etc
XIX	Officials from the Regional Office of MoEF&CC, Gol, Chennai who would be monitoring the compliance of the stipulated conditions and 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 shall be submitted to the CCF, Regional Office to MoEF&CC, Gol, and Chennai.	Complied.. During the monitoring of the unit by the Regional Office of MoEF & CC, Project authority extended their full cooperation by providing requisite data/documents.
XX	The project proponent shall submit the copies of the environmental clearance to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt.	Complied. We had submitted the copies of EC to all the concerned along with publication of the same in local NEWS papers.
XXI	The project authorities should advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and SEIAA, Telangana. This order shall be displayed in the website of the project proponent.	Complied Grant of EC was published in the newspaper "Namasthe Telangana" (Telugu) & "HANSINDIA" (English) newspapers on 16/07/2016.
XXII	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.	Not Applicable Presently the compliance status does not attract, since the EC was accorded on 20/5/2016 and the unit is in operation.
XXIII	The company shall undertake eco-development measures including community welfare measures in the project area.	Being complied. The company has undertaken eco-development measures including community welfare and also for overall improvement of the environment. As part of the eco-development measures we have planted different species of plants in and around our plant. Company has undertaken various schemes aimed at community development and rural upliftment in the project area These include ,but not limited to the follow <ol style="list-style-type: none"> 1) Providing water to the nearby villages 2) Distribution of tables, benches, chairs, Ceiling Fans and Almirah to Government Primary School located at Gaddapotharam 3) Paying the contractual staff wages of village school

XXI V	The proponent shall obtain all other mandatory clearances from respective departments	Being complied. All mandatory clearances inter-alia including CFE, CFO and PESO licence have been obtained from the Competent Authority.
XXV	Concealing the factual data or failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.	We have noted this condition and shall abide by the same.
XXV I	The SEIAA may revoke or suspend the order, if implementation of any of the above conditions is not satisfactory. The SEIAA reserves the right to alter/modify the above conditions or stipulate any further condition in the interest of environment protection.	We have noted this condition and shall abide by the same.
XXV II	The above conditions will be enforced inter-alia, under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment Protection Act, 1986 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Being complied. Consent & Authorization under Water and Air Act has been obtained from the State PCB vide Order No. TSPCB/RCP/HO/CFO&HWA/2017-3318 dated 09/03/2017, which is valid till 31/03/2021. Further, the unit has obtained Public Liability Insurance vide Policy No. 61220036173300000002 for the period 19/05/2017 to 18/5/2018.