



Ref: SRF-DJ/EC-HY/16-17/02  
November 28, 2016

To,  
The Chief Conservator Forests (Central)  
Ministry of Environment & Forests  
Regional Office (WZ), E - 5  
Area Colony, Link Road - 3  
Bhopal - 462016

भारतीय डाक  
INDIA POST  
RLAD PANCH FANS <392001>  
A RG693404633IN  
Counter No:1, CP-Code:PA  
To:GUJARAT POLLUTION CB,  
Gandhinagar (Gujarat) H.O., PIN:382010  
From:SRF LIMITED, DAHEJ  
Wt:540grams,  
Amt:135.00 ,29/11/2016 ,09:57  
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Subject: Half yearly Environmental Clearance Compliance Report

Reference: "Environment Clearances vide letter no. J-11011/1261/2007-IA-II (I) Dated: May 07, 2008

Dear Sir,

Please find enclosed herewith Half Yearly Environmental Clearance Compliance Report for your ready reference.

We hope you will find in order.

For SRF Limited

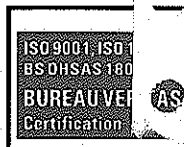
  
Dhananjay Ranade  
Sr. Vice President - Works

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A RG693404647IN  
Counter No:1, CP-Code:PA  
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Bhopal G.P.O., PIN:462016  
From:SRF LIMITED, DAHEJ  
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Amt:270.00 ,29/11/2016 ,09:58  
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CC to:

1. The Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhawan, Sector-10 A Gandhinagar, Gujarat 382010
2. The Member Secretary SEIAA, Gujarat Pollution Control Board, Paryavaran Bhawan, Sector 10 A, Gandhinagar, Gujarat 382010

भारतीय डाक  
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A RG693404630IN  
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Gandhinagar (Gujarat) H.O., PIN:382010  
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An ISO 9001 -2008, ISO 14001 -2004 and OHSAS 18001 -2007 Certified Company

**SRF LIMITED**

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**Compliance of Environmental Clearance J-11011/1261/2007-IA-II (I) Dated: May 07, 2008  
(Period April 2016 to September 2016)**

Ref. No.	Compliance Condition	Compliance Status																														
1	This has reference to your letter no nil dated 6 <sup>th</sup> November 2007 along with form 1 and Prefeasibility report seeking environmental clearance for the above project under the environmental impact assessment notification 2006.	-----																														
2	<p>The Ministry of Environment and Forests has examined the application and noted that proposal is for Environmental Clearance for setting up a Chemical Manufacturing Plant at Dahej Industrial Estate, Bharuch Gujarat by M/s SRF Ltd. The total project area is 546 hectares of which 163.8 hectares (30% of project area), with 30 m width will be provided all along the periphery of the project site for green belt. Total cost of project will be Rs. 2400 crores. Capital and recurring cost earmarked for environmental protection measures are about Rs.71.3 crores and about Rs 10.2 crores, at current prices. Dahej Industrial Estate is located at about 45 km from Bharuch city. Following will be the products and production capacity:</p> <table border="1" data-bbox="226 922 948 1361"> <tbody> <tr> <td>Anhydrous Hydrofluoric acid (AHF)</td> <td>70000</td> <td>TPA</td> </tr> <tr> <td>Caustic- chlorine (of Cl2)</td> <td>140000</td> <td>TPA</td> </tr> <tr> <td>Sulphuric acid</td> <td>230000</td> <td>TPA</td> </tr> <tr> <td>Tetrachloroethylene (TCE)/ Perchloroethylene (PCE)</td> <td>80000</td> <td>TPA</td> </tr> <tr> <td>Tetrafluoroethylene (HFC-134a)</td> <td>30000</td> <td>TPA</td> </tr> <tr> <td>Difluoromethane (HFC 32)</td> <td>15000</td> <td>TPA</td> </tr> <tr> <td>Pentafluorothane (HFC 125)</td> <td>15000</td> <td>TPA</td> </tr> <tr> <td>Fluoro Specialty Products</td> <td>10000</td> <td>TPA</td> </tr> <tr> <td>Polyster chips</td> <td>150000</td> <td>TPA</td> </tr> <tr> <td>Polyster film</td> <td>100000</td> <td>TPA</td> </tr> </tbody> </table>	Anhydrous Hydrofluoric acid (AHF)	70000	TPA	Caustic- chlorine (of Cl2)	140000	TPA	Sulphuric acid	230000	TPA	Tetrachloroethylene (TCE)/ Perchloroethylene (PCE)	80000	TPA	Tetrafluoroethylene (HFC-134a)	30000	TPA	Difluoromethane (HFC 32)	15000	TPA	Pentafluorothane (HFC 125)	15000	TPA	Fluoro Specialty Products	10000	TPA	Polyster chips	150000	TPA	Polyster film	100000	TPA	<p>Complied. April 2016 to September 2016 Production reports attached. <b>Annexure - I</b></p>
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3	<p>About 25,000 KLD of water will be required and will be must from GIDC supply from Narmada river. For the purpose of wastewater treatment, it is proposed to mix the effluents from various plants of neutralization. The combined effluent from different units will be taken to a common treatment plant where the effluent will be provided primary, secondary (two stage activated sludge process) and tertiary treatment. The treated effluent will meet disposal norms specified for marine waters. The effluent will be discharged to deep sea through existing pipeline of GIDC. Steam condensate and cooling tower/ boiler blow down will be mixed together (resulting water with ~700ppm TDS) and will be used for greenbelt within the project premises and for cleaning the plants. The process vents will be connected to a central absorption system followed by alkaline and acidic scrubbing systems to control the process emissions within permissible limits. Stacks of adequate heights will be provided for proper dispersion of residual pollutants. Low NOx burners will be used in the power plant to reduce the NOx emissions.</p>	<p>Complied. Water Consumption and source details is attached as per <b>Annexure II</b></p> <p>Effluent from various plants is collected in equalization tank and neutralized in neutralization tank. The combine effluent treated in designated ETP having primary, secondary (two stage activated sludge process) and tertiary treatment. Treated effluent analysis report is attached as <b>Annexure III</b>.</p> <p>Treated effluent discharged to sea through existing GIDC pipe line.</p> <p>Steam condensate and Cooling tower/ Blowdown treated separately, collected and treated by Ultra Filtration &amp; Reverse Osmosis system,</p>																														

Ref. No.	Compliance Condition	Compliance Status																								
		<p>permeate is reused in cooling tower makeup and reject used for horticulture purpose after quality check.</p> <p>All process vents are connected with central absorption system having suitable scrubbing system. All flue gas stacks are attached by adequate air pollution control measures system. Photographs are attached as <b>Annexure IV.</b></p>																								
4	<p>The hazardous waste generated at site will be stored in a secured storage area. The chemical storage and handling areas including effluent treatment areas will be made impervious to prevent groundwater pollution from leachate the quantities of wastes and their disposal will be as given below.</p> <table border="1" data-bbox="225 943 948 1608"> <thead> <tr> <th data-bbox="225 943 323 1021">S. No.</th> <th data-bbox="328 943 564 1021">Nature and source of stream</th> <th data-bbox="569 943 756 1021">Quantity (MT/month)</th> <th data-bbox="761 943 948 1021">Type of treatment</th> </tr> </thead> <tbody> <tr> <td data-bbox="225 1028 323 1106">1</td> <td data-bbox="328 1028 564 1106">Chemical sludge from waste water treatment</td> <td data-bbox="569 1028 756 1106">36</td> <td data-bbox="761 1028 948 1106">To be sent to authorized TSDF</td> </tr> <tr> <td data-bbox="225 1113 323 1236">2</td> <td data-bbox="328 1113 564 1236">Used/spent oil</td> <td data-bbox="569 1113 756 1236">10</td> <td data-bbox="761 1113 948 1236">To be sold off to CPCB registered processors</td> </tr> <tr> <td data-bbox="225 1243 323 1321">3</td> <td data-bbox="328 1243 564 1321">Spent catalysts</td> <td data-bbox="569 1243 756 1321">10</td> <td data-bbox="761 1243 948 1321">To be sent to authorized TSDF</td> </tr> <tr> <td data-bbox="225 1328 323 1406">4</td> <td data-bbox="328 1328 564 1406">Solid waste from brine clarifier</td> <td data-bbox="569 1328 756 1406">18</td> <td data-bbox="761 1328 948 1406">To be sent to authorized TSDF</td> </tr> <tr> <td data-bbox="225 1413 323 1608">5</td> <td data-bbox="328 1413 564 1608">Sulphur sludge from sulphur</td> <td data-bbox="569 1413 756 1608">7.5</td> <td data-bbox="761 1413 948 1608">To be sold for sodium bisulphate production/ sugar industry.</td> </tr> </tbody> </table> <p>* Spent catalysts replacements will be done once in 3 years.</p>	S. No.	Nature and source of stream	Quantity (MT/month)	Type of treatment	1	Chemical sludge from waste water treatment	36	To be sent to authorized TSDF	2	Used/spent oil	10	To be sold off to CPCB registered processors	3	Spent catalysts	10	To be sent to authorized TSDF	4	Solid waste from brine clarifier	18	To be sent to authorized TSDF	5	Sulphur sludge from sulphur	7.5	To be sold for sodium bisulphate production/ sugar industry.	<p>Hazardous waste is stored in secured storage areas with impervious flooring and shed to eliminate chances of contamination of land and water. All necessary precautions is taken during management and handling of hazardous wastes.</p> <p>The chemical storage and handling areas including effluent treatment plant areas having impervious RCC flooring, photographs attached as <b>Annexure V.</b></p>
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5	<p>The project activity is covered under para 5(e) under category 'A' of EIA Notification 2006. The proposal was considered and appraised by the Expert Appraisal Committee (Industry) in its 79<sup>th</sup> meeting held during 18<sup>th</sup>-20<sup>th</sup> march 2008 at the central level. No public hearing is required as para 7 (i) III Stage (3) of EIA Notification 2006.</p>	Information Noted																								
6	<p>The Ministry of Environment and Forests hereby accords environmental clearance to above project under the provisions of EIA Notifications dated 14<sup>th</sup> September, 2006 subject to the compliance to the following Specific and General Conditions:</p>	Information Noted																								

Ref. No.	Compliance Condition	Compliance Status
A.	<b>SPECIFIC CONDITIONS:</b>	-
i	The company shall install the wastewater treatment plant to treat the wastewater as per the norms prescribed by the Gujarat Pollution Control Board. The company shall make the efforts to utilize treated wastewater for greenbelt development.	<b>Complied.</b> The Effluent Treatment Plant (ETP) is established to treat wastewater as per GPCB norms. Photographs Attached as <b>Annexure VI.</b>  Treated effluent from ultrafiltration and reverse osmosis is utilized in cooling tower make-up and treated sewage is utilized in greenbelt development.
ii	The company shall produce the agreement letter from GIDC to accept the treated wastewater for discharge into sea along with necessary permission and capacity of the pipeline before commencement of the project.	<b>Complied.</b> Company has obtained approval from GIDC and line is laid until the discharge point from ETP for final disposal as allotted by GIDC. Copy attached as <b>Annexure VII.</b>
iii	The company shall install the continuous monitoring stations to monitor all sources of air pollution including Cl, HF & F. The monitoring report shall be submitted to Ministry's Regional Office at Bhopal.	<b>Shall Comply.</b> Regular monitoring being carried out for HF, Cl <sub>2</sub> , Br <sub>2</sub> and NH <sub>3</sub> . Monthly analysis is done by GPCB / NABL approved agency. Reports are attached as <b>Annexure VIII.</b>  Capex Budget of Rs. 1.2 Crore is under approval from senior management.  As of today we have installed SPM, NO <sub>x</sub> , SO <sub>2</sub> , TOC, TSS, PH. Photos of the same attached.  Approximate investment done for the same is 2.17 cr, details attached as <b>Annexure IX.</b>
iv	The company shall install alarm system for detection of any leakages of chlorine and provide all necessary safety arrangements for accidental leakages.	<b>Complied.</b> Chlorine leak detectors are installed at strategic locations. Appropriate control measures are provided to handle accidental leakages.
v	The project authorities shall provide the chilled brine solution in secondary condenser for condensation for the VOCs and ensure that the solvent recovery shall not be less than 95%.	<b>Complied.</b> Secondary Condensers are provided having chilled brine solution at appropriate locations to enhance the recovery and reduce loss of solvent.  Solvent Consumption, Recovery and Losses details as per <b>Annexure X.</b>
vi	The company shall provide the monitoring arrangements with vents and regular monitoring shall be carried out and reports submitted to the SPCB, CPCB and Ministry's Regional Office at Bhopal.	<b>Complied.</b> Monthly monitoring is being carried out by MoEF approved agency and monitoring reports submitted regularly to GPCB RO, Bharuch. Analysis Report attached as <b>Annexure XI.</b>

Ref. No.	Compliance Condition	Compliance Status	
vii	To prevent loss following measures shall be taken	-	
	A	Reactor shall be connected to chilled brine condenser systems.	<b>Complied.</b>
	B	Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	<b>Complied.</b>
	C	The condenser shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.	<b>Complied.</b>
	D	Solvents shall be stored in a separate space specified with all safety measures.	<b>Complied.</b> All relevant safety measures are taken.
	E	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	<b>Complied.</b> Proper earthing is provided.
	F	Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	<b>Complied.</b>
viii	The process emissions VOCs and particulate matters from various units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emissions levels shall go beyond the stipulated standards. In the event of failure of pollution control systems 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.	<b>Complied.</b> All parameters are within prescribed limit.  Monthly monitoring is being carried out by MoEF approved agency and monitoring reports submitted regularly to GPCB RO, Bharuch.  Analysis Report attached as <b>Annexure XI.</b>	
ix	Fugitive emissions in the work zone environment, product, and raw material storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by the GPCB.	<b>Complied.</b> Work zone environment monitoring is carried out on monthly basis and records (Form 37) maintained. Reports attached as <b>Annexure XII.</b>	
x	For control of fugitive emissions and VOCs following steps shall be followed:	-	
	A	Closed handling systems shall be provided for chemicals.	All chemicals are handled in closed system.
	B	Reflux condenser shall be provided over reducer.	<b>Complied.</b>
	C	Solvent handling pump shall be provided with mechanical seals to prevent leakages.	<b>Complied.</b>
	D	System of leak detection and repair of pump/pipeline based on preventive maintenance.	Preventive Maintenance is being carried out. Leak detection shall be complied
	E	Solvent shall be taken from underground storage tanks to reactors through closed pipelines. Storage tanks shall be vented through tap receiver and condenser operated on chilled water.	<b>Complied.</b> No underground storage tank in the premises.
xi	The company shall obtain membership of TSDF and copy shall be submitted to Ministry's Regional Office at Bhopal.	<b>Complied.</b> TSDF membership has been taken from M/s. BEIL, Ankleshwar, Saurashtra Enviro Projects Private Limited, Kutch & M/s. RSPL, Panoli for hazardous waste disposal and a	

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		copy is attached. <b>Annexure – XIII.</b>																										
xii	During transfer of materials, spillages shall be avoided and garlands drain be constructed to avoid mixing of accidental spillages with domestic waste from storm drains.	<b>Complied.</b> All domestic and storm water drains are segregated at site. Spillage and leakage plan attached as <b>Annexure XIV.</b>																										
xiii	The project authorities shall develop greenbelt in 163 ha area of project as per the guidelines of CPCB to mitigate the effect of fugitive emissions.	<p><b>Complied.</b> <b>Complied.</b> Out of 118.17 ha, 35.75 ha is projected area and 12.30 ha is developed by green belt which is 34% of projected area.</p> <p>Approx. 12484 Nos. of trees has been planted in South and West side of plant premises.</p> <table border="1"> <thead> <tr> <th>Plant Local Name</th> <th>Botanical Name</th> </tr> </thead> <tbody> <tr> <td>Ashoka</td> <td>Saraca asoca</td> </tr> <tr> <td>Badam</td> <td>Almond</td> </tr> <tr> <td>Bottle Brush</td> <td>Callistemon</td> </tr> <tr> <td>Bottle Palm</td> <td>palmiste gargoulette</td> </tr> <tr> <td>Gulmohar</td> <td>Delonix regia</td> </tr> <tr> <td>Karanj</td> <td>Pongam oiltree</td> </tr> <tr> <td>Kasid</td> <td>Cassiacimia</td> </tr> <tr> <td>Neem</td> <td>Azadirachta indica</td> </tr> <tr> <td>Nil Giri</td> <td>Eucalyptus</td> </tr> <tr> <td>Parash Pipal</td> <td>Thingnam Girija</td> </tr> <tr> <td>Sapatparni</td> <td>Alstonia</td> </tr> <tr> <td>Saru</td> <td>Casurina</td> </tr> </tbody> </table> <p>Photographs of Green Belt are attached as Annexure <b>XV.</b></p>	Plant Local Name	Botanical Name	Ashoka	Saraca asoca	Badam	Almond	Bottle Brush	Callistemon	Bottle Palm	palmiste gargoulette	Gulmohar	Delonix regia	Karanj	Pongam oiltree	Kasid	Cassiacimia	Neem	Azadirachta indica	Nil Giri	Eucalyptus	Parash Pipal	Thingnam Girija	Sapatparni	Alstonia	Saru	Casurina
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xiv	Adequate financial provisions shall be made in budget of the project for implementation of the above suggested environmental safeguards. Funds so earmarked shall not be divert to any another purpose.	<b>Complied.</b> Sufficient funds allocated on annual basis.																										
xv	Occupational health surveillance of the workers shall be done on regular basis and records maintained as per the Factories Act.	<b>Complied.</b> Regular health check-up of workers is being done as per The Factories Act.																										
xvi	Risk assessment report should be prepared and submitted to the Ministry's within 6 months.	<b>Complied.</b> Risk Assessment report was submitted along with EIA report.																										

Ref. No.	Compliance Condition	Compliance Status
xvii	The company shall make the arrangements for protection of possible fire hazards during manufacturing process in material handling.	<b>Complied.</b> Adequate firefighting system installed at site.
<b>B</b>	<b>GENERAL CONDITIONS</b>	-
i	The project authorities shall strictly adhere to the stipulations of the SPCB/ state government or any statutory body.	<b>Complied.</b> CC&A taken from GPCB which is valid up to 11.01.2017 for the 14583.4 MTPM chemical productions and 25 MW Captive Power Plant.
ii	No further expansions or modifications in the plant shall be carried out without prior approval of the Ministry of Environment And Forests. In case of deviations or alterations in the project proposals 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.	<b>Being complied.</b>
iii	The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 as amended. Authorization from the SPCB shall be obtained for collection, treatment, storage, and disposal of hazardous wastes.	<b>Complied.</b> Provisions of MSIHC Rules have implemented. Risk Assessment and On-site Emergency Plan is prepared and submitted. Regular mock drills are carried out at site. Mock Drill report is attached as <b>Annexure XVI</b> . 105 LEL detectors for methane, HF, Cl2, HCl, NH3, and Br2 are installed at site.
iv	Ambient Air Quality monitoring stations shall be set up in the downwind direction as well where maximum ground level concentrations are anticipated in consultation with the State pollution control board.	<b>Complied.</b> Ambient Air Quality Monitoring is done on monthly basis by GPCB / NABL Approved agency. Report copy is attached as <b>Annexure VIII</b> .
v	For control of process emissions, stacks of appropriate height as per the Central Pollution Control Board guidelines shall be provided. The scrubbed water shall be sent to ETP for further treatment.	<b>Complied.</b> Adequate stack height and suitable air pollution control equipment are provided. Photographs attached as <b>Annexure IV</b> .  Scrubbed water is treated in Effluent Treatment Plant.
vi	The company shall take following waste minimization measures:	-
*	Metering of quantities of active ingredients to minimize waste.	<b>Complied.</b> Photographs of Closed Feed System / Powder Processing system are attached as <b>Annexure XVII</b> .
*	Reuse of by-products from the process as raw materials or as raw materials substitutes in other processes.	
*	Maximize recoveries	
*	Use of automated materials transfer systems to minimize spillages.	
*	Use of "Closed Feed" systems into batch reactors.	

Ref. No.	Compliance Condition	Compliance Status
vii.	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous waste in accordance with the Hazardous Waste (Management and Handling) Rules, 2003. Authorization from the SPCB shall be obtained for collections/treatment/storage/disposal of hazardous wastes.	<b>Complied.</b> TSDF membership has been taken from M/s. BEIL, Ankleshwar, Saurashtra Enviro Projects Private Limited, Kutch & M/s. RSPL, Panoli for hazardous waste disposal. <b>Annexure – XIII.</b>
viii.	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 source of noise generation. The ambient noise levels shall conform to be standards prescribed under environment (protection) Act, 1986 rulers, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	<b>Complied.</b> Noise level is being monitored and control measures are provided. Monitoring Reports are attached as <b>Annexure XVIII.</b>
ix	A separate environment management cell equipped with full-fledged laboratory facilities shall be set up to carry out the environmental management and monitoring functions.	<b>Complied.</b> We have separate Environmental Management Cell equipped with full-flagged laboratory facility to carry out environmental management and monitoring function. The report of this group is directly to head of the location.
x	The project authorities shall provide rain water harvesting system and ground water recharge.	<b>Complied.</b> Rainwater Harvesting from Roof top photographs is attached as <b>Annexure XIX.</b>
xi	The implementation of the project vis-a vis environmental action plan shall be monitored by Ministry's Regional Office/SPCB/CPCB/. A six monthly compliance status report shall be submitted to monitoring agencies.	<b>Complied.</b> Both Existing EC Compliance status submitted on 31st May 2016
xii	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 and may also be seen at website of the Ministry at <a href="http://envfor.nic.in">http://envfor.nic.in</a>	<b>Complied.</b> The condition regarding information the public about the Environmental clearance had been done. Advertisement copy attached as <b>Annexure XX.</b>
xiii.	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 the start of the project.	<b>Complied.</b> Financial Closure Details were submitted on 11/06/2015 to MoEF RO, Bhopal, copy attached as <b>Annexure XXII.</b>
6	The ministry may revoke or suspend the clearance, if implementation of any of above conditions is not satisfactory.	Noted
7	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner shall implement these conditions.	Noted
8	Any appeal against this environmental clearance shall lie with the National Environment Appellate Authority, if preferred within a period of 30 days as prescribed under section II of the National Environment Appellate Authority Act, 1997.	Noted



Ref. No.	Compliance Condition	Compliance Status
9	The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention and Control of Pollution) Act, 1974, Air (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.	<b>Complied.</b> Noted and PLI copy is attached as <b>Annexure XXI.</b>