



By Hand Delivery / Courier / R.P.A.D

Ref.: SRF/ENV/MOEF/2022/02

December 7, 2022

To,  
The Scientist,  
Integrated Regional Office,  
Ministry of Environment, Forest and Climate Change,  
Room no. 407, Aranya Bhawan, Near CH-3 Circle, Sector 10A,  
Gandhinagar, Gujarat – 382010.

Sub.: Submission of half-yearly compliance report for the period of June – 22 to November -22

Ref.: 1) EC NO. SEIAA/GUJ/EC/5(f)/1538/2020 dated 15-DEC-2020  
2) EC NO. J-11011-379-2016-IA II (I) DATED 19-DEC-2017

Dear Sir,

This has reference to the above & as per section 10 of EIA notification, dated 14<sup>th</sup> September, 2006, we are submitting herewith half yearly compliance report through hard copy and e-mail of accorded Environment Clearance (EC) from MoEFCC Delhi for the period of June 22 to November 22.

We hope you would find the same in order.

Thanking you.

Yours faithfully,

For **SRF LIMITED**

**AUTHORIZED SIGNATORY**

Encl: Half yearly compliance report.

Copy to;

**SRF LIMITED**

Plot No. D-2/1,  
GIDC Phase-II, PCPIR,  
Dahej - 392130  
Taluka : Vagra,  
Dist. Bharuch  
State : Gujarat  
Ph.: 02641 - 289-201/202

**Regd. Office :**

The Galleria, DLF, Mayur Vihar,  
Unit No. 236 & 237, Second Floor,  
Mayur Place, Noida Link Road,  
Mayur Vihar Phase I Extn.,  
Delhi - 110 091  
CIN No. L18101DL1970PLC005197  
<http://www.srf.com>  
E-mail : [info@srf.com](mailto:info@srf.com)





1. The Secretary, Forest & Environment Department, Government of Gujarat, Sachivalay, 8<sup>th</sup> Floor, Gandhinagar (Gujarat)
2. The Member Secretary, Central Pollution Control Board, Parivesh Bhavan, CBD-cum Office Complex, East Arjun Nagar, New Delhi – 110 032
3. The Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector 10A, Gandhinagar – 382 010.
4. The Secretary, SEAC, C/o. GPCB, Gandhinagar – 382 010
5. State Level Environment Impact Assessment Authority, Gujarat, Gujarat Pollution Control Board, “Paryavaran Bhavan” Sector 10-A, Gandhinagar – 382 010
6. Monitoring Cell, Ministry of Environment & Forest, Paryavaran Bhavan, CGO Complex, New Delhi – 110 003.



**An ISO 9001-2015, ISO 14001-2015 and OHSAS 18001-2007 Certified Company**

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S. No.	Conditions	Compliance Status
<b>Compliance of EC Letter No. SEIAA/GUJ/EC/5(f)/1538/2020 DATED 15-Dec-20</b>		
<b>A</b>	<b>Specific Conditions</b>	
1	Unit shall have to comply with all the provisions of Ozone Depleting Substances (Regulation and Control) Rules, 2000 in letter and spirit.	We are complying to Ozone Depleting substances (Regulation and Control) Rules, 2000 as per column (4) of Schedule I. We have identified Ozone Depleting Substances Carbon tetrachloride (CTC) & Chloro-difluoromethane (HCFC-22) from our product list and being used as feedstock for manufacturing of other chemicals within the premises, as per Notification of Ministry of Environment, Forest and Climate Change on Ozone Depleting Substances (Regulations and Control) Amendment Rules dated 13th March, 2014. Permissions to produce and use a feedstock of HCFC-22 and CTC are attached as <b>Annexure-1</b> .
2	All measures shall be taken to prevent soil and ground water contamination.	<ul style="list-style-type: none"> <li>➤ Following measures are taken to prevent ground water and soil contamination.</li> <li>• 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 are taken during management and handling of hazardous wastes.</li> <li>• The chemical storage areas are having impervious flooring and dyke wall as secondary containment to prevent any soil and ground water contamination. The Effluent treatment plant is also having impervious flooring to prevent any contamination.</li> <li>• Monthly monitoring of Ground Water and half yearly monitoring of Soil Contamination near hazardous waste storage, guard pond, effluent treatment plant etc. are carried out to prevent soil and ground water contamination.</li> <li>• Ground and Soil water reports are attached as per <b>Annexure-2</b>.</li> </ul>
3	The National Ambient Air Quality Emission Standards issued by the Ministry vide G. S. R. No. 826 (E) dated 16th November 2009 shall be complied with.	Ambient Air Quality Monitoring is carried out on monthly basis in the impact zone (up-wind and down-wind). The report is attached herewith as per <b>Annexure-3</b> .
4	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G. S. R. 608 (E) dated 21/07/2010 and amended from time to time shall be followed.	We have carried out monthly monitoring of National Emission Standards for Organic Chemicals Manufacturing Industry requirement issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time by NABL and MoEFCC approved agency. The report is attached as per <b>Annexure-4</b> .
5	Unit shall have to adhere to the prevailing area specific policies of GPCB with respect to the discharge of pollutants and shall carry out the project development in accordance & consistence with the same.	We are adhering to the norms of discharging of pollutants as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022. The monitoring report of treated effluent discharge to GIDC network is attached as per <b>Annexure - 5</b> .

S. No.	Conditions	Compliance Status
6	The project proponent must strictly adhere to the stipulations made by the GPCB, State Government and/or any other statutory authority.	We are adhering to requirement made by GPCB and other statutory authority as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.
7	Close loop solvent recovery system, with adequate condenser system shall be provided to recover solvent vapors in such a manner that recovery shall be maximum and recovered solvent shall be reused in the process within premises.	Maximum recovery of all solvents is achieved by providing sufficient heat transfer area and residence time to the condenser. Close loop solvent recovery system with condenser system is in place for recovery of solvents. The solvent recovery details from Jun-22 to Nov-22 is attached as per <b>Annexure - 6</b> .
8	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR logbook shall be maintained	We have our preventive maintenance program for leak identification and repairing in place as per preventive maintenance schedules for all plants on defined frequency & implemented as per CPCB guidelines. Details of Logbook of LEL/Gas detector list is attached as per <b>Annexure - 7</b> .
9	Unit shall install CEMS (Continuous Emission Monitoring System) in-line CPCB direction to all SPCB vide letter no. 29016/04/06PCI-1/5401 dated 05/02/2014 for effluent discharge and air emission as per pollutants discharge/ emission from respective project and an arrangement shall also be done for reflecting the online monitoring results on the company's server, which can be assessable by the GPCB/CPCB on real time basis [ For Small/ Large/ Medium (Red Category) & Whichever (Air emission & Effluent discharge ) is applicable].	Continuous Emission Monitoring System for effluent discharge and stacks emissions are installed in unit. An arrangement is also available for reflecting the online monitoring results on the company's server, which can be accessed by the GPCB on real time basis. Photographs of the same are attached as per <b>Annexure - 8</b> .
10	<b>Safety &amp; Health</b>	
a	PP shall obtain PESO permission for the storage and handling of hazardous chemicals.	We have obtained the PESO permission for the storage and handling of hazardous chemicals. The list of PESO permissions is attached as per <b>Annexure - 9</b> .
b	PP shall provide Occupational Health Centre (OHC) as per the provisions under the Gujarat factories Rule 68-U.	<p>We have OHC center available manned by male nurse for 24X7. Full time medical officer (FMO) is appointed. Female nurse is also available for female employees. All required equipment's are as recommended in Gujarat Factories rule and additional equipment's also available in OHC as per site condition and chemicals handled.</p> 

S. No.	Conditions	Compliance Status
		We have BMW authorization valid up to 6th April 2027. The same is attached as per <b>Annexure - 10</b> .
c	PP shall obtain fire safety certificate / Fire No-Objection certificate (NOC) from the concern authority as per the prevailing Rule / Gujarat Fire Presentation and Life Safety Measures Act, 2016.	Fire safety certificate is obtained and valid up to 28-Dec-2022. The same is attached as per <b>Annexure-11</b> .
d	Unit shall adopt functional operations/process automation system including emergency response to elimination risk associated with the hazardous processes.	The operation/process associated with hazardous chemicals are DCS operated and interlinked with emergency alarms.
e	PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident.	We are conducting quarterly on-site mock drills. The latest mock drill was conducted on 15-Oct-22. The mock drill report of the same is attached as per <b>Annexure-12</b> .
f	PP shall install adequate fire hydrant system within premises and separate storage of water for the same shall be ensure by PP.	We have installed Fire hydrant system with 2000 KL dedicated storage tank and pump house with 4 nos. of main diesel pumps (410 m3/HR each) and 2 jockey pumps. Entire site is protected with fire hydrant network. Monthly inspection of fire hydrant system is being carried out by third party as per <b>Annexure-13</b> .
g	PP shall take all the necessary steps for human safety within premises to ensure that no harm is caused to any worker/employee or labour within premises.	We have system in place for PPE, work permit, safe chemical handling, periodic medical checkup etc. for workers/employee for human safety.
h	Flame proof electrical fittings shall be provided in the plant premises, whenever applicable.	We have provided flame proof electrical fittings in the process plants. Electrical fittings are selected as per hazardous area classification.
i	Unit shall provide effective isolation for Process area and storage of hazardous chemicals.	Process area and hazardous chemicals storage area are provided safe isolation in factory premises. Hazardous chemical Storage details are attached as per <b>Annexure - 14</b> .
<b>A-2</b>	<b>Water</b>	
11	Total water requirement for the project shall not exceed 49,678 KLD. Unit shall reuse 20,614 KLD of treated industrial effluent within premises. Hence, freshwater requirement shall not exceed 29,064 KLD and it shall be met through GIDC water supply only. Prior permission from the concerned authority shall be obtained for withdrawal of water.	In last six months (Jun-22 to Nov-22), average water consumption 8671 KLD. 4499 KLD treated effluent (ETP RO & Utility RO Permeate) is reused in cooling tower makeup. The water consumption detail is attached as per <b>Annexure - 15</b> .  We have taken prior permission from GIDC for water supply of 9000 KLD. Additional 6000 KLD desalination water usage is agreed upon the agreement with GIDC. Entire quantity is metered through meter, monthly billing done on metered quantity. The Copy of GIDC permission for Water Consumption is shown below.



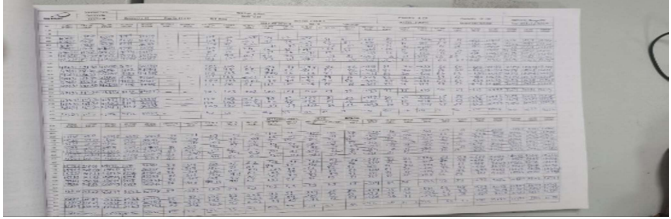





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	<p>•3638 KLD RO reject shall be generated out of which 1363 KLD shall be used for ash quenching and 2275 KLD shall be disposed in deep sea through GIDC drain.</p>	<table border="1" data-bbox="748 243 1414 604"> <tr><td>MEE Condensate tank</td></tr> <tr><td>Sludge tank</td></tr> <tr><td>Leachate tank</td></tr> <tr><td>Multiple effect evaporator (MEE) with Agitated thin film drier (ATFD)</td></tr> <tr><td>Acid dosing tank</td></tr> <tr><td>Alkali dosing tank</td></tr> <tr><td>Lime slurry Prp. Tank</td></tr> <tr><td>MGO slurry Prp. Tank</td></tr> </table> <p>2) Low COD/TDS Stream            Low COD/TDS: Settler Separator---&gt; Equalization ---&gt; Neutralization---&gt; Flocculator---&gt; Flash Mixer---&gt; Primary Settler---&gt; Trickling Filter---&gt; Aeration Tank---&gt; Secondary Settler---&gt; Tertiary Treatment---&gt; Ultrafiltration---&gt; Reverse Osmosis---&gt; Final Discharge.</p> <p>Capacity of low COD/TDS stream is 1000 KLD. Below treatment units are provided.</p> <table border="1" data-bbox="748 953 1036 1900"> <thead> <tr> <th>Treatment Unit</th> </tr> </thead> <tbody> <tr><td>Equalization tank</td></tr> <tr><td>Neutralization tank</td></tr> <tr><td>Flash mixer</td></tr> <tr><td>Flocculator</td></tr> <tr><td>Tube settler</td></tr> <tr><td>Feed sump</td></tr> <tr><td>Aeration tank</td></tr> <tr><td>Holding tank</td></tr> <tr><td>Flocculator</td></tr> <tr><td>Tube settler</td></tr> <tr><td>Final collection tank</td></tr> <tr><td>Guard tank</td></tr> <tr><td>Sludge tank</td></tr> <tr><td>Leachate tank</td></tr> <tr> <td><b>Round Tanks</b></td> </tr> <tr><td>Trickling filter</td></tr> <tr><td>Sec. Clarifier</td></tr> <tr><td> </td></tr> <tr><td>Acid dosing tank</td></tr> <tr><td>Alkali dosing tank</td></tr> <tr><td>Lime slurry prp. Tank</td></tr> </tbody> </table>	MEE Condensate tank	Sludge tank	Leachate tank	Multiple effect evaporator (MEE) with Agitated thin film drier (ATFD)	Acid dosing tank	Alkali dosing tank	Lime slurry Prp. Tank	MGO slurry Prp. Tank	Treatment Unit	Equalization tank	Neutralization tank	Flash mixer	Flocculator	Tube settler	Feed sump	Aeration tank	Holding tank	Flocculator	Tube settler	Final collection tank	Guard tank	Sludge tank	Leachate tank	<b>Round Tanks</b>	Trickling filter	Sec. Clarifier		Acid dosing tank	Alkali dosing tank	Lime slurry prp. Tank
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Flocculant prp. Tank					
15	Treated wastewater shall be sent for deep sea disposal via GIDC drain only after complying with the inlet norms of common facilities prescribed by GPCB to ensure no adverse impact on Human Health and Environment.	The treated wastewater analysis report from Jun-22 to Nov-22 is attached as pers <b>Annexure- 5.</b>			
16	Domestic wastewater generation shall not exceed 650 KL/day for proposed project, and it shall be treated in STP. Treated sewage shall be utilized for gardening and plantation purpose within premises after achieving on-land discharge norms prescribed by the GPCB.	Generated domestic wastewater is 272 KLD & treated in separate STP and treated sewage utilized for gardening and plantation within premises as per on-land discharge norms prescribed by the GPCB. The STP inlet and outlet report is attached <b>as per Annexure – 5.</b>			
17	During monsoon season when treated sewage may not be required for the plantation/ Gardening/ Green belt purpose, it shall be stored within premises. There shall be no discharge of wastewater outside the premises in any case.	During monsoon season treated sewage will be utilized in cooling tower make up. A guard pond of 813 KL is provided for treated sewage.			
18	Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste during rainy days	We have provided 5500 KL capacity Guard Pond at site for treated wastewater storage during maintenance / damage to the pipeline conveying wastewater to the deep sea.			
19	The unit shall provide metering facility at the ETP, RO & STP and maintain records for the same.	We have dedicated flow meters available for High COD and TDS effluent, Low COD and TDS effluent, UF and RO inlet and outlet. Records are maintained on daily basis. ETP Photographs with metering facility are attached as per <b>Annexure - 17.</b>			
20	Proper logbooks of ETP, RO & STP, treated effluent reused in gardening/ plantation & process, chemical consumption in effluent treatment, quantity & quality of treated effluent, power consumption etc., shall be maintained and shall be furnished to the GPCB from time to time.	Logbooks are available for ETP, RO & STP. The photograph of logbook is shown below.			




S. No.	Conditions	Compliance Status
		 <p>RO Plant Logbook</p>  <p>CETP Plant Logbook</p>  <p>MEE Plant Logbook</p> <p>On monthly basis the treated effluent report is submitted to GPCB.</p> 




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<b>A-3</b>	<b>Air</b>																															
21	Unit shall not exceed fuel consumption for Boilers, TFHs, HAGs, dryers and D. G. sets as mentioned.	<p>The consumption of coal, HSD, FO/LSHS/LDO are well within the specified limit. The fuel consumption details are mentioned below.</p> <table border="1" data-bbox="743 405 1450 663"> <thead> <tr> <th>Sr. No.</th> <th>Fuel</th> <th>Unit</th> <th>Permissible Limit</th> <th>Avg. consumption</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Coal</td> <td>MT/day</td> <td>600</td> <td>874.31*</td> </tr> <tr> <td>2</td> <td>HSD</td> <td>KL/day</td> <td>215</td> <td>8.51</td> </tr> <tr> <td>3</td> <td>FO</td> <td>KL/day</td> <td>142.5</td> <td>0.36</td> </tr> <tr> <td>4</td> <td>LSHS</td> <td>KL/day</td> <td>110</td> <td>56.19</td> </tr> <tr> <td>5</td> <td>Natural Gas</td> <td>NM3/day</td> <td>45000</td> <td>0</td> </tr> </tbody> </table> <p>Note: * Higher consumption is due to commissioning of new 175 TPH Boiler (CPP).</p>	Sr. No.	Fuel	Unit	Permissible Limit	Avg. consumption	1	Coal	MT/day	600	874.31*	2	HSD	KL/day	215	8.51	3	FO	KL/day	142.5	0.36	4	LSHS	KL/day	110	56.19	5	Natural Gas	NM3/day	45000	0
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22	Unit shall provide adequate APCM with flue gas generation sources as mentioned.	List of flue gas stacks with APCM are attached as per <b>Annexure 18</b> as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/+2022.																														
23	Unit shall provide adequate APCM with process gas generation sources as mentioned.	List of process gas stacks with APCM as on 30-Nov-22 are attached <b>as per Annexure 18</b> as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.																														

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24	<p>The fugitive emission in the work zone environment shall be monitored. The emission shall conform to the standards prescribed by the concerned authorities from time to time (e.g., directors of Industrial Safety &amp; Health). Following indicative guidelines shall also be followed to reduce the fugitive emission.</p> <ul style="list-style-type: none"> <li>› Internal roads shall be either concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement</li> <li>› Air borne dust shall be controlled with water sprinklers at suitable locations in the plant.</li> <li>› A green belt shall be developed all around the plant boundary and along the roads to mitigate fugitive &amp; transport dust emission.</li> </ul>	<p>The fugitive emission monitoring is carried out in work zone environment.</p> <div data-bbox="743 342 1414 611" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;"><b>FORM NO-37</b> (Prescribe Under Rule 12-B)</p> <p style="text-align: center;"><b>Register Containing Particulars of monitoring of working environment required under section 7 -A(2) (E)</b></p> <p>1. Company Name and address: <b>M/s. SRF LIMITED</b> D/7, GIDC Phase II, PCPIR, Dahisar, Bhavnagar - 380 150 Report No: 503430555 Barcode No: Aa48437096</p> <p>2. Reason of Enquiry/Complaint: <b>Head Rectification Tank</b></p> <p>3. Date of Measurement: <b>03-Jun-2022</b></p> <p>4. Name of Inspector: <b>No</b></p> <p>5. By Product: <b>No</b></p> <p>6. Hazardous: <b>No</b></p> <p>7. Particulars of Sampling: <b>Solvent</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Sr. No.</th> <th>Location/Operation monitored</th> <th>Identified contaminants</th> <th>Sampling instrument used</th> <th>Number of Samples</th> <th>Range</th> <th>Average</th> <th>MSL Concentration (As per Scheduled)</th> <th>Reference Method</th> <th>Number of Workers present at the location during monitoring</th> <th>Remarks</th> <th>Signature of Inspecting Officer</th> <th>Name of Inspecting Officer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>7</td> <td>8</td> <td>9</td> <td>10</td> <td>11</td> <td>12</td> </tr> <tr> <td>1</td> <td>Near Abrasion Tank</td> <td>Ammonia</td> <td>VOC Meter (PHOTOCHECK T901)</td> <td>3</td> <td>BDL</td> <td>BDL</td> <td>2 PPM</td> <td>NIOSH Method of air sampling &amp; analysis</td> <td>1</td> <td>Found OK</td> <td></td> <td>PRETESA</td> </tr> </tbody> </table> <p style="text-align: right;"><b>For SRF Infrastructure Ltd.</b> <b>AUTHORIZED LABORATORY</b> M/s. SATYANARAYAN GANDHAR TECHNICAL MANAGER</p> </div> <p>The photographs of control devices are attached as per <b>Annexure – 19</b>.</p> <p>Following Pollution Control System installed at site for controlling fugitive emission.</p> <ul style="list-style-type: none"> <li>• Internal roads in factory premises are constructed with RCC to eliminate dusting during vehicle movement.</li> <li>• Coal is covered with tarpaulin during transportation.</li> <li>• Coal loading and unloading activity is being done in closed shed.</li> <li>• Handling and transportation of coal is through covered coal conveyers</li> <li>• Dust collectors are installed to abate the nuisance of dust.</li> <li>• Installation of two Silo for fly ash storage.</li> <li>• The unit has developed the greenbelt of 19% within the premises and will develop around 17% greenbelt at an adjacent alternative land given by GIDC. The MoU is already signed with GIDC to develop greenbelt outside the premises. Around 35000 nos. of trees are already planted at an alternative adjacent GIDC land and planting more. The photographs of existing greenbelt are attached as per <b>Annexure – 30</b>.</li> </ul>	Sr. No.	Location/Operation monitored	Identified contaminants	Sampling instrument used	Number of Samples	Range	Average	MSL Concentration (As per Scheduled)	Reference Method	Number of Workers present at the location during monitoring	Remarks	Signature of Inspecting Officer	Name of Inspecting Officer	1	1	2	3	4	5	6	7	8	9	10	11	12	1	Near Abrasion Tank	Ammonia	VOC Meter (PHOTOCHECK T901)	3	BDL	BDL	2 PPM	NIOSH Method of air sampling & analysis	1	Found OK		PRETESA
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25	Regular monitoring of Volatile Organic Compound (VOCs) shall be carried out in the work zone and ambient air	VOC monitoring is being undertaken through an NABL accredited laboratory both in the work zone and ambient air. The report is attached as per <b>Annexure 20</b> .																																							
26	For control of fugitive emission, VOCs, following steps shall be followed: a. Closed handling and charging system shall be provided for chemicals. b. Reflux condenser shall be provided over Reactors/ Vessels. c. Pumps shall be provided with mechanical seals to prevent leakages. d. Air borne dust at all transfers operations/ points shall be controlled either by spraying water or providing enclosures.	Following Pollution Control System installed at site for controlling fugitive emission. <ul style="list-style-type: none"> <li>• Coal is covered with tarpaulin during transportation.</li> <li>• Coal loading and unloading activity is being done in closed shed.</li> <li>• Handling and transportation of coal is through covered coal conveyers</li> <li>• Dust collectors are installed to abate the nuisance of dust.</li> <li>• Installation of two Silo for fly ash storage.</li> </ul>																																							

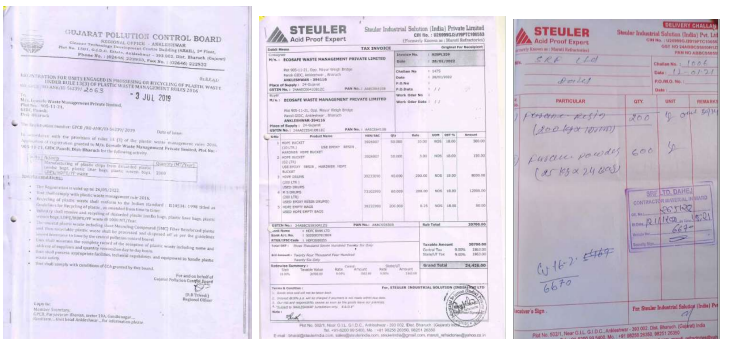


S. No.	Conditions	Compliance Status
		 <ul style="list-style-type: none"> <li>• Powder chemicals are charging in reactor through closed powder transferring system (PTS) to avoid spillage.</li> <li>• Double mechanical is used in Pump and Compressor. Regular preventive maintenance done of pumps, compressor, valves etc.</li> <li>• Leak detection and repair test in pipeline and valve being done through pneumatic and hydraulic testing method.</li> <li>• Adequate stack height provided as per CPCB guideline in all flue and process gas emission.</li> <li>• VOC monitoring is being done at different plant locations.</li> </ul>
27	<p>Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, HCl, HF, NH3, Br2, Cl2 and VOCs shall be carried out in the impact zone and its records shall be maintained. Ambient air quality levels shall not exceed the standards stipulated by the GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be taken immediately. The location of the station and frequency of monitoring shall be decided in consultant with the GPCB.</p>	<p>Ambient air quality monitoring is being undertaken on monthly basis by NABL accredited laboratory at four locations. No observations were by GPCB w.r.t. monitoring locations during their regular inspections. Perusal of the test reports related to ambient air quality monitoring reveal that all the monitored parameters (PM10, PM2.5, SO2, NOx, HCl, HF, NH3, Br2, Cl2 and VOCs) are well within the stipulated standards. The monitoring report is attached as per <b>Annexure – 3</b></p>


S. No.	Conditions	Compliance Status
		
<b>A4</b>	<b>SOLID / HAZARDOUS WASTE:</b>	
28	All the hazardous waste management shall be taken care as mentioned.	We are following the Hazardous waste and other wastes (Management & Handling) Rules, 2016.
29	Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other Waste Management and Transboundary Movement) Rules 2016.	We are selling hazardous waste to authorized actual user or end users only. All the authorized actual/end users have applied/obtained permissions from concerned authorities under Rule 9 of the Hazardous and Other Waste Management and Transboundary Movement) Rules 2016. The list of authorized end users along with MoU details in summary is attached as per <b>Annexure 21</b> .
30	Unit shall explore the possibilities for environment friendly methods like co-processing of hazardous waste for disposal of incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.	Spent Solvent, Process Residue, Spent Catalyst, and Spent Catalyst disposal directly sent to cement industry for co-processing with compliance of Hazardous and Other Waste Management Rule 2016.
31	The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.	Complied. The list of authorized end users along with MoU details in summary is attached as per <b>Annexure 21</b> .
A-5	<b>Other</b>	

<b>S. No.</b>	<b>Conditions</b>	<b>Compliance Status</b>
32	The project proponent shall allocate the separate fund of Rs. 2.8075 Crore i.e. 0.25% of the capital investment for the activities in accordance to the MoEFCC's Office Memorandum No. F.No. 22-65/2017-IA.III dated 01/05/2018. The entire activities proposed under CER shall be monitored and the monitoring report shall be submitted to the regional office of MoEFCC as a part of half-yearly compliance report and to district collector. The monitoring report shall be posted on the website of the project proponent.	We have spent around INR 43 crores towards infrastructure development, rural education program, sanitation, swachta kit, drinking water facilities in last three years.  In FY 21-22 (Apr 2021 to Mar 2022), we have spent INR 486 Lakhs in surrounding villages nearer Dahej plant.
33	All the recommendations, mitigation measures, environmental protection measure and safeguards proposed in the EIA report of the project prepared by Aqua Air Environmental Engineers Pvt. Ltd, Surat and submitted by project proponent and commitments made during presentation before SEAC and proposed in the EIA report shall be strictly adhered to in ----- spirit.	Following recommendations, mitigation measures, environmental protection measures and safeguards are complied with below actions. <ul style="list-style-type: none"> <li>• Proper collection, Safe Handling, Storage within premises and disposal of waste at designated TSDF, incineration facility, recyclers, re-processors, and co-processing.</li> <li>• Separate effluent treatment plants are in operation for treating different effluent streams.</li> <li>• Adequate pollution control system has provided for control of gaseous emission like adequate stack height for better dispersion of pollutants and scrubbers for process emission.</li> <li>• Acoustic enclosure on DG sets, engineering control at high noise area like compressor etc.</li> <li>• Developed greenbelt around the periphery of the plant premises.</li> <li>• Monitoring of various environmental parameters is carried out to check the effectiveness of the control system.</li> </ul>
<b>B</b>	<b>General Condition</b>	
<b>B-1</b>	<b>CONSTRUCTION PHASE:</b>	
34	Water demand during construction shall be reduced by use of curing agent, super plasticizers, and other best construction practices.	The construction/erection of Polytetrafluoroethylene plant work is in progress. Super Plasticizers are being used to reduce construction water requirement
35	Project proponent shall ensure that surrounding environment shall not be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for controlling fugitive emission.	The construction/erection of Polytetrafluoroethylene plant work is in progress. Construction activity is restricted to within the project premises and no impact on the surrounding environment outside the project area is anticipated. All such material carting is being done after water sprinkling.
36	All required sanitary and hygienic measures shall be provided before starting the construction activities and to	Major part of project is in operation. Required sanitary and hygienic requirement are fulfilled before starting the construction activity and maintained throughout.





S. No.	Conditions	Compliance Status
	be maintained throughout the construction phase.	
37	First Aid Box shall be made readily available in adequate quantity at all the times.	Adequate and well equipped first aid boxes are maintained at in various departments. We ensure periodical inspection of these boxes.
38	The project proponent shall strictly comply with the Building and other Construction Workers' (Regulation of Employment & Conditions of Service) Act 1996 and Gujarat rules made there under their subsequent amendments. Local byelaws of concern authority shall be complied in letter and spirit.	All construction activities and workers are started and deployed resp. only after conforming byelaws & rules. No show cause notices were issued by local authorities.
39	Ambient noise levels shall conform to residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.	Monthly ambient noise levels by NABL accredited laboratory and half yearly workplace noise monitoring are monitored to confirm Noise level standards. The report of the same is attached as per <b>Annexure - 22</b> .
40	Use of Diesel Generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the EPA Rules for air and noise emission standards.	We are using captive power for our construction work. In case of DG set use, we are complying to EPA norms of air and noise. DG sets are provided with acoustic enclosures. Air and Noise level monitoring is carried out on monthly basis and results are well within permissible limits.
41	Safe disposal of wastewater and municipal solid wastes generated during the construction phase shall be ensured.	<p>All the domestic wastewater relates to Sewage treatment plant of 340 KLD.</p> <p>Municipal solid waste like demolition wastes, construction wastes is used for filling in low lying areas. Other waste generated during contractor's activities is taken back by contractor (part of agreement) Other wastes plastic, metal and wooden are sold to recyclers. Below is one of the example of plastic waste disposal to recycler;</p> 
42	All topsoil excavated during construction activity shall be used in horticultural / landscape development within the project site.	The excavated soil during construction activity will be used for horticulture/landscape development within premises.


S. No.	Conditions	Compliance Status
43	Excavated earth to be generated during the construction phase shall be utilized within the premises to the maximum extent possible and balance quantity of excavated earth shall be disposed of with the approval of the competent authority after taking the necessary precautions for general safety and health aspects. Disposal of the excavated earth during construction phase shall not create adverse effect on neighboring communities.	The excavated soil during construction activity will be used for horticulture/landscape development within premises. We are using excavated soil for building plinth filling & filling in low lying areas within our premises and not sending anything outside.
44	Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, ready mix concrete (RMC) and land free paints in the project	Fly ash is used in the backfilling required for road construction. We are encouraging usage of RMC & fly ash paver blocks for new construction.
45	Fly ash shall be used in construction wherever applicable as per provisions of Fly Ash Notification under the E.P. Act, 1986 and its subsequent amendments from time to time.	For construction activity, wherever possible, we will use fly ash brick.
46	"Wind - breaker of appropriate height i.e. 1/3rd of the building height and maximum up to 10 meters shall be provided. Individual building within the project site also be provided with barricades.	Noted and being complied
47	"No uncovered vehicles carrying construction material and waste shall be permitted."	All the internal movement of construction material is being done after water sprinkling
48	"No loose soil or sand or at construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emissions shall be ensured."	All sand storages are properly maintained with frequent water sprinkling. No soil is being stored on site
49	Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads).	We have the pucca road for vehicle movement inside the plant.
50	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	All the excavation started only after identified place of captive consumptions available to discourage stacking of soil
51	Dust mitigation measure shall be displayed prominently at the construction site for easy public viewing.	Display Board showing dust mitigation measures is placed at construction site as shown below;

S. No.	Conditions	Compliance Status
		
52	Grinding and cutting of building materials in open area shall be prohibited.	Grinding & cutting is done at defined place identified for such activities at contractor fabrication area
53	Construction material and waste should be stored only within earmarked area roadside storage of construction material and waste shall be prohibited.	All construction material is stored near to construction area at predefined & marked location. No construction waste is stacked on site
54	Construction and demolition waste processing and site shall be identified and required dust mitigation measures be notified at the site. (if applicable).	Construction or Demolition waste is being used for filling low lying areas within premises with proper rolling and compaction.
<b>B-2</b>	<b>OPERATION PHASE:</b>	
<b>B.2.1</b>	<b>WATER:</b>	
55	The water meter shall be installed, and records of daily and monthly water consumption shall be maintained.	Separate water meter installed in inlet of water receipt from GIDC, and daily and monthly water consumption maintained. Daily records are maintained in logbooks.
56	All efforts shall be made to optimize water consumption by exploring Best Available Technology (BAT). The unit shall continuously strive to reduce, recycle, and reuse the treated effluent.	In last six months from Jun-22 to Nov-22, average 4499 KLD RO permeate is recycled & reused in cooling tower makeup.
<b>B.2.2</b>	<b>AIR</b>	
57	In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that there should not be any adverse impact on human health & environment. Unit shall carry out third party monitoring of the proposed Spray dryer & it's APCM through the credible institutes and study report for impacts on Environment and Human Health shall be submitted to GPCB every year along with half yearly compliance report.	Not applicable as spray dryer are not used in process/operations.
58	Acoustic enclosure shall be provided to the DG sets (if applicable) to mitigate the noise pollution and shall conform to the EPA Rules for air and noise emission standards.	To control noise level, we have provided acoustic enclosures in all 7 DG sets. The DG set capacity are 2 x 500 KW, 2 x 840, 3 x 4200 KVA were provided with acoustic enclosures and stack of height 11 meter and 30-meter resp. Air & Noise level monitoring are monthly carried out by NABL accredited laboratory.
59	Stack/Vents (whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/process gas emission.	We have provided adequate stack height as per the prevailing norms for flue gas emissions of GPCB/CPCB and MOEFCC.

S. No.	Conditions	Compliance Status		
		Stack No.	Stack Attached To	Stack Height in Meter
		1	Boiler 17 TPH	53
		2	Boiler 35 TPH	94 (Common Stack)
		3	Boiler 35 TPH	
		4	Boiler 60 TPH	
		5	DG Set 500 KW (600 KVA)	11
		6	DG Set 500 KW (600 KVA)	11
		7	DG Set 840 KW (1010 KVA)	30
		8	DG Set 840 KW (1010 KVA)	30
		9	TCE/PCE Plant Thermic Fluid Heaters No. 1	50
		10	TCE/PCE Plant Thermic Fluid Heaters No. 2	50
		11	HFC 134a Plant Thermic Fluid Heaters	50
		12	AHF Plant Heater No. 1 (Thermic Fluid Heaters)	46
		13	AHF Plant Drying System No. 1	35
		14	AHF Plant Heaters No. 2 (Thermic Fluid Heater)	46
		15	AHF Plant Drying System No. 2	35
		16	Difluoromethan (HFC 32) Plant Hot Oil Furnace (Thermic Fluid Heater)	55
		17	Boiler 30 TPH	63
		18	Boiler 30 TPH	63
		19	DG Sets 4200 KVA	30
		20	DG Sets 4200 KVA	30
		21	DG Sets 4200 KVA	30
		22	Dust Collector	11
		23	Boiler 17 TPH	53
60	Flue gas emission & Process gas emission (if any) shall conform to the standards prescribed by the GPCB/CPCB/MoEFCC. At no time, emission level should go beyond the stipulated standards.	Monthly monitoring is carried out for Flue gas and process gas emission. The monitoring report is attached as per <b>Annexure - 23.</b>		
61	All the reactors / vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	All ingredient feed to reactor/vessel are in close feed system like Pipeline, Powder transferring system.		
<b>B.2.3</b>	<b>HAZARDOUS / SOLID WASTE</b>			

S. No.	Conditions	Compliance Status
62	<p>The company shall strictly comply with the rule and regulations with regards to handling and disposal of Hazardous waste in accordance with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016, as may be amended from time to time. Authorization of the GPCB shall be obtained for collection / treatment / storage / disposal of hazardous wastes.</p>	<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 are taken during management and handling of hazardous wastes. We have obtained authorization for Hazardous and Other Waste (Management and Transboundary Movement) Rule 2016 from Gujarat Pollution Control Board vide letter No. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022. Details are attached as <b>Annexure – 24</b></p> <p>We are having membership of TSDf of M/s. Recycling Solutions Pvt. Ltd., M/s. BEIL, M/s. SEPL and Common Incineration facility of M/s SEPPL, Kutch for disposal of hazardous waste.</p> <p>During transportation of hazardous waste following procedure is being adopted:</p> <ul style="list-style-type: none"> <li>- Labelling of hazardous waste is done as per Form-8. Relevant information is provided to transporter in Form-9. Online manifest is being prepared through GPCB XGN site before sending the hazardous waste. Hazardous waste record is being updated on GPCB XGN site on monthly basis.</li> </ul>
63	<p>Hazardous wastes shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.</p>	<p>Hazardous waste is stored in secured dedicated storage areas with impervious flooring and shed to eliminate chances of contamination of land and water. The leachate is collected and treated in ETP.</p>
64	<p>The unit shall have obtained necessary permission form the nearby TSDf site CHWIF. (whichever is applicable)</p>	<p>Necessary permission obtained from nearby TSDf site and CHWIF, copy of membership certificates are shown below;</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="751 1199 1052 1663">  </div> <div data-bbox="1057 1199 1393 1663">  </div> </div>



S. No.	Conditions	Compliance Status
		
65	Trucks / Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.	All the trucks/tankers used for hazardous waste are complying to Motor vehicle act.
66	The design of the Trucks / Tankers shall be such that there is no spillage during transportation	We are ensuring the good condition of trucks/tankers are been used for hazardous waste handling.
67	All possible efforts shall be made for Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF.	Spent Solvent, Process Residue, Spent Catalyst, and Spent Catalyst disposal directly send cement industry for co-processing with compliance of Hazardous and Other Waste Management Rule 2016. Spent solvents and Process residue are sent to cement industry namely JK Lakshmi cement, Shree cement, Ambuja cement, Ultratech cement.
68	Management of fly ash (If any) shall be as per the Fly ash Notification 2009 & its amendment time to time it shall be ensured that there is 100% utilization of fly ash to be generated from the unit.	100% ash utilized by cement industries and brick manufacturing industries. Two silos are provided for fly ash storage. Last fly ash annual return is filled for FY 21-22 on 29/04/2022.







S. No.	Conditions	Compliance Status																
<b>B.2.4</b>	<b>SAFETY:</b>																	
69	The occupier / manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rule 1963	We SRF limited are strictly complying the rules and guidelines under Factories Act 1948 and the Gujarat Factories Rule 1963.																
70	The project authorities shall strictly comply with the provisions made in manufacture, storage and import of hazardous chemicals rules (MSIHC) 1989, as amended time to time and the Public Liability Insurance Act for handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning of the project. Requisite On-site and Off-site Disaster management Plans have to be prepared and implemented.	<p>We SRF limited are strictly complying the rules and guidelines under Manufacture, Storage, and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time and all transportation of Hazardous Chemicals are as per the Motor Vehicle Act (MVA), 1989. Haz chemical storage, handling and control details are attached as per <b>Annexure - 14</b>.</p> <ul style="list-style-type: none"> <li>Public Liability Insurance is available and copy of the same is attached as per <b>Annexure 25</b>.</li> <li>Hazardous chemicals storage approval is obtained, and details is attached as per <b>Annexure – 9</b>.</li> <li>On site emergency plan is available and reviewed on yearly basis. The content of the same is attached as per <b>Annexure - 26</b>.</li> </ul>																
71	Main entry and exit shall be separate and clearly marked in the facility.	Main entry and exit are separate and clearly marked in the facility.																
72	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender / emergency vehicle around the premises.	Adequate wide roads are provided for free movement of fire tender/emergency vehicles.																
73	Storage of flammable chemicals shall be sufficiently away from the production area.	Hazardous chemicals are stored in designated tanks. Tank, drums, carboys etc. stored as per chemical compatibility, material of constructions and PESO guideline.																
74	Enough fire extinguishers shall be provided near the plant and storage area.	<p>Total 2381 nos. of fire extinguishers are available in the plant.</p> <table border="1" data-bbox="784 1423 1360 1734"> <thead> <tr> <th colspan="2">Fire Extinguisher</th> </tr> <tr> <th>Type</th> <th>Qty (in nos.)</th> </tr> </thead> <tbody> <tr> <td>ABC Type</td> <td>985</td> </tr> <tr> <td>DCP Type</td> <td>429</td> </tr> <tr> <td>CO2 Type</td> <td>491</td> </tr> <tr> <td>MF Type</td> <td>472</td> </tr> <tr> <td>Fire Ext -K-Type</td> <td>04</td> </tr> <tr> <td>Total</td> <td>2381</td> </tr> </tbody> </table>	Fire Extinguisher		Type	Qty (in nos.)	ABC Type	985	DCP Type	429	CO2 Type	491	MF Type	472	Fire Ext -K-Type	04	Total	2381
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75	All necessary precautionary measures shall be taken to avoid any king of accident during storage and handling of toxic / hazardous chemicals	Safe operating procedures prepared for storage and handling of hazardous & toxic chemicals. To avoid accidents during handling all required controls like temperature indication, level indicators are provided.																

S. No.	Conditions	Compliance Status
76	All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permissions in this regard shall be obtained before commencing the expansion activities.	Storage of toxic/hazardous chemicals is being done at optimum level, necessary permissions of the same obtained before taking facilities in use.
77	The project management shall ensure to company with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report.	As recommended in risk assessment, environment protection measures and risk mitigation measures have been considered in design stage.
78	Only flame proof electrical fittings shall be provided in the plant premises.	Flame proof electrical fittings provided in the plant premises.
79	Storage of hazardous chemicals shall be minimized, and it shall be in multiple small capacity tanks / containers instead of one single large capacity tank / containers	We have dedicated storage tanks for required capacity. Hazardous chemicals, storage and control detail is attached as per <b>Annexure – 14</b> .
80	All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/ dyke walls shall be provided for storage tanks for Hazardous Chemicals.	Practice of periodic thickness testing of tanks is in practice to know wear & tear, corrosion etc. Pressure vessels (storage tanks) are being tested periodically as per GFR and PESO guidelines for early detection of wear & tear. LEL sensors and toxic gas sensors are also provided to detect leakages. Storage tanks are fitted with high-level indicators to avoid overflow. Proper dyke and bunds are provided around transfer pump area. Tanks are provided with dyke walls. Corrosive pipelines and tested periodically.
81	Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.	Handling and charging of the chemicals done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.
82	Tie up shall be done with nearby health care unit / doctors for seeking immediate medical attention in the case of emergency.	We have tie up with healing touch Hospital, Baroda Heart Hospital, Apex Hospital, I-Q Hospital at Bharuch and Bhailal Amin General Hospital, Sterling Hospital, BAPS Hospital, Tricolor Hospital at Vadodara for immediate medical attention in the case of emergency.
83	Personal Protective Equipment's (PPEs) shall be provided to workers and its usage shall be ensured and supervised.	All necessary PPEs is providing to workers
84	First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	Trained First aiders are identified from individual plants and Antidotes are also available in occupational health center. Detail of Antidotes is attached as per <b>Annexure - 27</b> .

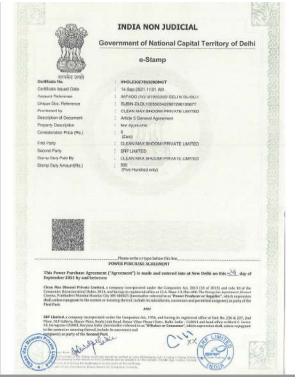
S. No.	Conditions	Compliance Status
85	Training shall be imparted to all the workers on safety and health and aspects of chemicals handling.	Periodic safety training is imparted to workers/employees. Recent training summary with photograph is attached as per <b>Annexure – 28</b> Safety and Health aspects for chemical handling. Our training center is approved by Gujarat State government under Rule- 111A. We have dedicated manpower & facility for imparting training on EHS aspects.
86	Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre - employment and periodical medical examination for all the workers shall be done and its records shall be maintained. Pre-employment and periodical medical examination for all the workers shall be undertaken as per the Factories Act & Rules.	The health surveillance is carried out for all the employees. The sample records are as per <b>Annexure-32</b> ;
87	Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.	We SRF limited are strictly complying the rules and guidelines under Manufacture, Storage, and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time and all transportation of Hazardous Chemicals are as per the Motor Vehicle Act (MVA), 1989. Applicable provisions of MSIHC rules are. <ul style="list-style-type: none"> <li>• Audit</li> <li>• Onsite emergency plan</li> <li>• Reporting of Major accident</li> <li>• Safety audits</li> <li>• Labelling of vehicles</li> <li>• All vehicles are with GPS System for hazardous Waste transportation.</li> </ul>
88	The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report.	We have identified requirements under Manufacture, storage & Import of Hazardous Chemicals Rules, 1986 & the factories Act, 1948. Compliance of these requirements are monitored in register of regulation to keep system in compliant state. <ul style="list-style-type: none"> <li>• Quantitative risk assessment is carried out by third party and the content of the same is attached as per <b>Annexure – 29</b>.</li> <li>• We have installed Fire hydrant system as per GFR 66 A norms.</li> <li>• Process hazard analysis and HAZOP study is conducted for each process and recommendations are implemented.</li> <li>• We have implemented HSE management system as per CCPS guidelines.</li> <li>• We have implemented Induction course for HSE at very initial stage employees' recruitment.</li> </ul>

S. No.	Conditions	Compliance Status
		<ul style="list-style-type: none"> <li>• We are conducting Periodic On-Site Emergency Mock Drills to maintain preparedness levels of employees to tackle any emergency.</li> <li>• We are maintaining Emergency handling facilities in operational condition at all time to avoid failures.</li> <li>• We have prepared Safe operating procedure for hazardous process and material handling process. -We have provided Smoke detectors and sprinkler system in go down/warehouse, drum storage area etc.</li> <li>• We calibrate Safety devices and control instruments once in a year.</li> <li>• Proper color work as per IS 2379 of plant, pipeline, tank, equipment is being maintained to protect assets from corrosion</li> <li>• We have prepared Preventive maintenance schedule for all critical equipment's.</li> <li>• We have implemented Permit to work system for hazardous work in the plant.</li> <li>• We have prepared and distributed Safety manual as per Gujarat Factories Rule-68 K &amp; P and Public awareness manual as per Gujarat Factories Rule 41 B &amp; C to all employees and nearby public</li> <li>• We have extended Fire &amp; Safety organization setup to implement better plant process safety.</li> <li>• Plant process safety recommendations provided in relevant section of the report should be complied at plant commissioning stage.</li> </ul>
89	Necessary permissions form various statutory authorities like PESO, factory Inspectorate and other shall be obtained prior to commissioning of the project	As a part of pre-start-up check we are obtaining all pre-requisite permissions from PESO, GIDC and factory inspectorate.
<b>B.2.5</b>	<b>NOISE</b>	
90	The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures including engineering controls like acoustic insulation hoods, silencer, enclosures etc. on all sources of noise generation. The ambient noise level shall confirm to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.	<ul style="list-style-type: none"> <li>• To control noise level, we have provided acoustic enclosures in all four DG sets, segregation of utility areas.</li> <li>• Based on noise level sitting arrangements have been done in separate areas to minimize personal exposure.</li> <li>• To minimize noise pollution vibrating pads, low noise making machineries have been provided.</li> <li>• Ambient noise monitoring level is being checked on monthly basis to check efficiency of controls. The personal protective equipment (PPE) is provided to workers &amp; employees working in noisy areas.</li> </ul>
<b>B.2.6</b>	<b>CLEANER PRODUCTION AND WASTE MINIMISATION:</b>	

S. No.	Conditions	Compliance Status
91	The unit shall undertake the Cleaner Production Assessment study through a reputed institute / organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to the GPCB.	We have dedicated team for new technology, innovation, and changes within plant. At plant level also, respective production team is working with environmental team for waste minimization and environmental projects. The Cleaner production assessment study is in progress by Gujarat Cleaner Production center. Draft report is prepared. It will be completed by Dec-22.
92	<p>The company shall undertake various waste minimization measures such as:</p> <p>a. Metering and control of quantities of active ingredients to minimize waste</p> <p>b. Reuse of by-product from the process as raw materials or as raw materials substitutes.</p> <p>c. Use of automated and close filling to minimize spillages.</p> <p>d. Use of close feed system into batch reactors.</p> <p>e. Venting equipment through hoses for cleaning to reduce wastewater generation.</p> <p>g. Recycling of washes to subsequent batch.</p> <p>h. Recycling of steam condensate.</p> <p>i. Sweeping / mopping of floor instead of floor washing to avoid effluent generation.</p> <p>j. Regular preventing maintenance for avoiding leakage, spillage etc.</p>	<p>Waste minimization measures taken as follow;</p> <ul style="list-style-type: none"> <li>• We have installed flow meters, load cell &amp; Level transmitter for metering &amp; control of active ingredient</li> <li>• Re-use by-products as raw material like NH3 solution, 30% HCl, Hypo, wherever applicable and rest part sale.</li> <li>• All filling machine are provided with automated filling facility to avoid spillage.</li> <li>• All ingredient feed to reactor in close feed system like Pipeline, Powder transferring system.</li> <li>• Vent pipes are provided to reduce wastewater generation</li> <li>• Using high pressure jet machine &amp; spray ball for cleaning to reduce wastewater generation</li> </ul> <div data-bbox="787 1045 1382 1661" style="display: flex; flex-wrap: wrap;">     </div> <ul style="list-style-type: none"> <li>• Washes water is recycled and subsequently reused.</li> <li>• Steam condensate is collected separately and treated in ETP /RO &amp; RO permeate is recycled to cooling tower makeup</li> </ul>

S. No.	Conditions	Compliance Status
		<ul style="list-style-type: none"> <li>We are using sweeper machine for pucca roads and flooring.</li> <li>We have standard preventive maintenance program to avoid any leakages or spillages.</li> </ul>
<b>B.2.7</b>	<b>GREEN BELT AND OTHER PLANTATION:</b>	
93	The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on roadsides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC/GPCB and submit an action plan of plantation for next three years to the GPCB.	The unit has developed the greenbelt of 19% within the premises and will develop around 17% greenbelt at an adjacent alternative land given by GIDC. The MoU is already signed with GIDC to develop greenbelt outside the premises. Around 35000 nos. of trees are already planted at an alternative adjacent GIDC land and planting more. The photographs of existing greenbelt and MoU details are attached as per <b>Annexure – 30</b> .
94	Drip irrigation / low - volume, low-angle sprinkler system shall be used for the green belt development within the premises.	We are using Drip irrigation / low-volume, low-angle sprinkler system for the green belt development within the premises.
<b>B.3</b>	<b>OTHER CONDITION:</b>	
95	Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEFCC vide no. F. 22-34/2018-IA. III dated 09/08/2018 for pharmaceutical and Chemical industries mentioned at (Sr. no. XX)	The unit is falling under Annexure-XX of MoEFCC vide no. F. 22-34/2018-IA. III dated 09/08/2018. We are complying with the standard EC conditions of statutory compliance, air quality monitoring and preservation, water quality monitoring and preservation, energy conservation measures, waste management, greenbelt, safety & human health, corporate environment responsibility and other conditions.
96	The project proponent shall allocate the separate fund for Corporate Environment Responsibility (CER) in accordance with the MoEFCC's Office Memorandum No. F No. 22-65/2017-IA.III dated 01/05/2018 to carry out the activities under CER in affected area around the project. The entire activities proposed index CER shall be monitored, and the monitoring report shall be submitted to the regional office of MoEFCC as a part of half-yearly compliance report and to district collector. The monitoring report shall be posted on the website of the project proponent.	<p>We have spent around INR 43 crores towards infrastructure development, rural education program, sanitation, swachta kit, drinking water facilities in last three years.</p> <p>In FY 21-22 (Apr 2021 to Mar 2022), we have spent INR 486 Lakhs in surrounding villages nearer Dahej plant.</p>




S. No.	Conditions	Compliance Status
97	Rain water harvesting of surface as well as rooftop run off shall be undertaken and the same water shall be used for the various activities of the project to conserve fresh water as well as to recharge ground water. Before recharging the surface run off, pre-treatment must be done to remove suspended matter.	<p>The rooftop rainwater transfers through storm water drain to storm water collection sump. We have arrangement of rainwater transferred from 50 KL collection tank to Utility RO for re-using in cooling tower.</p> <p>Roof top rainwater collection system is installed in RGFS roof to collect approx. 2142 KL water and re-use in cooling tower make up.</p>
98	The unit shall join and participate financially and technically for any common environmental facility / infrastructure as and when the same is taken up either by the industrial association or GIDC or GPCB or any such authority created for this purpose by the Govt./ GIDC.	We have joined and participated financially and technically Dahej Industrial Association, Dahej.
99	Application of solar energy shall be incorporated for illumination of common areas, lighting for gardens and street lighting in addition the provision for solar water heating system shall be provided.	<p>We have signed the Power purchase agreement with Cleanmax Bhoomi Pvt Ltd. to generate the electricity through renewal power – Wind Solar Hybrid Power plants and Wind Power plants. The renewal power (hybrid – solar/wind) with 2 MW is started from 19-Nov-22.</p> 
100	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.	The unit has developed the greenbelt of 19% within the premises and will develop around 17% greenbelt at an adjacent alternative land given by GIDC. The MoU is already signed with GIDC to develop greenbelt outside the premises. Around 35000 nos. of trees are already planted at an alternative adjacent GIDC land and planting more. The photographs of existing greenbelt and MoU details are attached <b>as per Annexure - 30</b>
101	All the commitments / undertakings given to the SEAC during the appraisal process for the purpose of environmental protection and	We are complying to adhere all the commitments/undertakings given to SEAC during the appraisal process for the purpose of environment protection and management.

S. No.	Conditions	Compliance Status
	management shall be strictly adhered to.	
102	The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose for the environmental protection and management.	Not applicable.
103	In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed and shall not be restarted until the desired efficiency of the control equipment has been achieved.	Agreed. We will safely close our unit if failure of any pollution control system adopted by the unit and will not restart until the desired efficiency of the control equipment will be achieved. We have developed safe shutdown procedures that shall ensure safety of plant and environment.
104	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.	We are adhering to requirement made by GPCB and other statutory authority as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.
105	During material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water.	All material transfers are through closed pipelines and dedicated transferring systems. To avoid mixing of accidental spillage of chemicals process plants have been provided with separate drains like – process effluent collection with pump arrangement. Plant washings gets collected in wash pits. Steam condensate pits are also separate from plant effluents. Storm water drains and not connected in plant drains hence storm water will never get contaminated with process effluent.
106	Pucca flooring/ impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination	Work areas, chemical storage areas and chemical handling areas have pucca flooring with impervious flooring. All such floorings have containment provision to collect accidental spillage at one place and to avoid soil contamination.
107	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.	To contain leaks from pumps, pipelines & tanks we have provided adequate containment provisions in the form of garland curb walls, dykes and dedicated pits with transfer arrangements. In addition to above leak in open area will be contained and managed by high capacity spill kits.
108	No further expansion or modifications in the plant likely to cause environmental impact shall be carried out without obtaining prior Environment Clearance from the concerned authority.	Expansions will be done after taking permissions from MOEFCC/SEIAA.

S. No.	Conditions	Compliance Status
109	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollutants) Act, 1974, Air (Prevention & Control of Pollutants) Act, 1981, The Environment (Protection) Act, 1986, Hazardous waste (Management Handling and Transboundary Movement) rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Noted. we are adhering conditions in letter and spirit.
110	The project proponent shall comply all the conditions mentioned in "The Companies (Corporate Social Responsibility Policy) Rules, 2014 " and its amendment from time to time in a letter and spirit.	<p>We have spent around INR 43 crores towards infrastructure development, rural education program, sanitation, swachta kit, drinking water facilities in last three years.</p> <p>In FY 21-22 (Apr 2021 to Mar 2022), we have spent INR 486 Lakhs in surrounding villages nearer Dahej plant. The CSR activity details are attached <b>as per Annexure 31.</b></p>
111	The project management shall ensure that unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.	<p>SRF Limited is complying following recommendation made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing.</p> <ul style="list-style-type: none"> <li>• Established wastewater treatment facility and online monitoring equipment.</li> <li>• Provided continuous emission monitoring system for flue gas.</li> <li>• Provided gas detectors in Raw Material storage area.</li> <li>• All necessary PPEs is providing to workers.</li> <li>5. Provided Hazardous Waste Storage Facility separately.</li> <li>• Developed 30 – 50 m width greenbelt to factory periphery.</li> <li>• Environmental Laboratory established for Wastewater analysis and monitoring.</li> <li>• Environmental Monitoring is being done on regular basis by NABL and MoEF approved laboratory.</li> <li>• Fugitive emission and Workplace monitoring is being done on regularly basis.</li> <li>• Separate environmental monitoring cell.</li> <li>• Allocated earmarked capital and operation budget for environmental activity.</li> <li>• CSR fund allocated for socio economic development.</li> <li>• HSE management system is implemented.</li> </ul>

S. No.	Conditions	Compliance Status
		<ul style="list-style-type: none"> <li>• Process hazard analysis and HAZOP study is being conducted for each process.</li> <li>• Periodic on-Site Emergency Mock Drills is being conducted, so those staffs are trained and are in a state of preparedness to tackle any emergency.</li> </ul>
112	The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA as well as GPCB along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other propose.	Various safeguards like MEE, ETP, scrubbers, stacks etc. are installed for which financial allocations has made under CAPEX and OPEX. Company has spent INR 4.42 crore toward capital investment in ETP & INR 80+ crores in operation. This includes the cost of ETP/MEE/RO operation and waste disposal charges. New Utility UF/RO plant is commissioned in Aug-22.
113	The applicants shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the GPCB and may also be seen at the Website of SEIAA/SEAC GPCB. This shall be advertised within seven days from the date of the clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in the Gujarati language and other in English. A copy each of the same shall be forwarded to the concerned Regional Office of the Ministry	<p>The condition regarding information to the public about the accorded environmental clearance SEIAA/GUJ/EC/5(f)/1538/2020 DATED 15-Dec-20 by the SEIAA had published in local newspaper as shown below;</p> <div data-bbox="787 919 1125 1339" style="border: 1px solid black; padding: 5px;"> <div style="text-align: center;"> <p><b>PUBLIC NOTICE</b> <b>ENVIRONMENTAL CLEARANCE</b></p> </div> <p>It is hereby informed that the State Level Environment Impact Assessment Authority (SEIAA), Parayavaran Bhavan, Sector - 10A, Gandhinagar - 382 010, has accorded Environmental Clearance for setting up expansion of Synthetic Organic Chemicals by <b>M/s. SRF Limited</b> at Plot No. D-2/F. Village: Suva, GIDC Phase II, Dahej, Taluka Vagra, Dist. Bharuch (Gujarat) vide letter No. SEIAA/GUJ/EC/5(f)/1538/2020 dated 15th December, 2020 under the provision of EIA Notification dated 14th September 2006. Copies of Clearance letter are available at GPCB and on website of SEIAA/SEAC/GPCB.</p> <p>Date: 21/12/2020 <span style="float: right;"><b>AUTHORIZED SIGNATORY</b> <b>SRF LIMITED</b></span></p> <hr/> <div style="text-align: center;"> <p><b>જાહેર સૂચના</b> <b>(પર્યાવરણીય મંજૂરી)</b></p> </div> <p>આ અંગે જાણવાવાળાં આને જો કે હાલ સરકાર સ્તરેનું પર્યાવરણ અસરોની પાલિકા ભવન, સેક્ટર-૧૦ એ, ગાંધીનગર-૩૮૨૦૧૦ અને <b>શ્રીમતી સી.એ.એ.એલ્. લિમિટેડ</b>, પ્લોટ નં. ડી-૨/૧, સુવા ગ્રામ, જી.ડી.સી. ડેરા રુ. હાજી તાલુકા, જી. બરુચ (ગુજરાત) આગ સી.એ.એ.એ.એલ્. લિમિટેડના સુધીન વિસ્તાર માટેની પર્યાવરણીય મંજૂરી (દિવસનાં ૧૫, ૨૦૨૦ ના રજા સમયે SEIAA/GUJ/EC/5(f)/1538/2020 ક્રમાં ૧૬.૧૨.૨૦૨૦ ના તારીખે)ને લગતી જરૂર સંબંધમાં ૨૦૨૦ નો સંબંધમાં સંબંધિત છે.</p> <p>સંબંધિત પર્યાવરણીય મંજૂરી અંગેની વિગતો સ્વીકારવા માટે SEIAA/SEAC/GPCB ની સંબંધિત વેબસાઇટ પર જાણવા સુધી.</p> <p>Date: 21/12/2020 <span style="float: right;"><b>AUTHORIZED SIGNATORY</b> <b>SRF LIMITED</b></span></p> </div>
114	It shall be mandatory for the project management to submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1st June and 1st December of each calendar year.	<p>Half-yearly compliance reports on Environmental Clearance conditions status submitted regularly to respective Regional Office of MoEFCC, the respective Zonal office of CPCB and SPCB.</p> <p>Copy of last half yearly compliance report submitted to zonal office of CPCB and SPCB is shown below.</p>





S. No.	Conditions	Compliance Status
		
115	Concealing factual data or submission of false / fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provision of Environment (Protection) Act, 1986	Noted, we ensure submission of all factual data in all correspondence with MOEF and GPCB.
116	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	We are adhering to requirement made by GPCB and other statutory authority as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.
117	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	Noted, we agree for this condition.
118	The company in a time bound manner shall implement these conditions. The SEIAA reserves the right to stipulate additional conditions, if the same is found necessary.	Noted
119	The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the data of financial closure and final approval of the project by the concerned authorities and data of start of the project.	The construction/erection of Polytetrafluoroethylene plant work is in progress.  TFE/PTFE construction was started in Apr-21.
120	This environmental clearance is valid for seven years from the date of issue.	Noted.

S. No.	Conditions	Compliance Status
121	Any appeal against this environmental clearance shall lie with National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Noted, till today we have not received any appeal or representation etc. from NGT or any other NGO.
122	Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application makes this environmental clearance cancelled.	Noted.
Sr. No.	Conditions	Compliance Status
<b>Compliance of EC Letter No. J-11011/379/2016-IA II (I) dated 19<sup>th</sup> December, 2017</b>		
<b>12</b>	<b>CONDITIONS:</b>	
(a)	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.	We have obtained CTE/CTO from Gujarat Pollution Control Board vide letter No. GPCB/BRCH-B-CCA-38(15)/ID-24521/591856 dated 07/06/2021 and GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022 vide no. AWH-119079 Valid up to 10/01/2027  Copy of CTE/CTO attached herewith as <b>Annexure-24.</b>
(b)	The effluent discharge outside the plant shall conform to the standards prescribed under the Environment (Protection) Rule, 1986.	We have installed continuous monitoring system (pH, TOC, TN, Flow, TSS) with interlock before discharge the effluent to GIDC common network. And also we are carrying out monthly monitoring of treated effluent discharge outside the plant by MoEF & NABL approved agency, report attached as <b>Annexure-5.</b>
(c)	Necessary authorization required under the Hazardous and Other Waste (Management and Transboundary Movement) Rule, 2016, Solid Waste Management Rule, 2016 shall be obtained and the provision contained in the Rules shall be strictly adhered to.	We have obtained authorization for Hazardous and Other Waste (Management and Transboundary Movement) Rule 2016 from Gujarat Pollution Control Board vide letter No. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022 valid up to 10/01/2027. We have obtained CCA Renewal vide AWH-119079 Valid up to 10/01/2027. Details attached as <b>Annexure-24.</b>  All the provisions contained in the Rules are strictly followed.
(d)	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21 <sup>st</sup> July, 2010 and amended from time to time shall be followed.	We have carried out monthly monitoring of National Emission Standards for Organic Chemicals Manufacturing Industry requirement issued by the Ministry vide G.S.R. 608(E) dated 21 <sup>st</sup> July, 2010 and amended from time to time by NABL and







S. No.	Conditions	Compliance Status
		MoEFCC approved agency. The report is attached as per <b>Annexure-3</b> .
(e)	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 guideline.	<p>Following Pollution Control System is installed at site for controlling fugitive emission.</p> <ul style="list-style-type: none"> <li>• Coal is covered with tarpaulin during transportation.</li> <li>• Coal loading and unloading activity is being done in closed shed.</li> <li>• Handling and transportation of coal is through covered coal conveyers</li> <li>• Dust collectors are installed to abate the nuisance of dust.</li> <li>• Installation of two Silo for fly ash storage.</li> <li>• Powder chemicals are charging in reactor through closed powder transferring system (PTS) to avoid spillage.</li> <li>• Double mechanical is used in Pump and Compressor. Regular preventive maintenance done of pumps, compressor, valves etc.</li> <li>• Leak detection and repair test in pipeline and valve being done through pneumatic and hydraulic testing method.</li> <li>• Adequate stack height provided as per CPCB guideline in all flue and process gas emission. The details of stack are attached <b>as per Annexure – 18</b></li> <li>• VOC monitoring being done on regular basis.</li> </ul> <p>Photographs of suitable pollution control devices and Fugitive Emission Monitoring Report attached as <b>Annexure-19</b>.</p>
(f)	<p>Solvent management shall be carried out as follows:</p> <ul style="list-style-type: none"> <li>(i) Reactor shall be connected to chilled brine condenser system</li> <li>(ii) Reactor and solvent handling pump shall have mechanical seals to prevent leakages.</li> <li>(iii) The condensers shall be provided with sufficient HTA and residence time to achieve more than 95% recovery.</li> <li>(iv) Solvent shall be stored in a separate space specified with all safety measures.</li> <li>(v) Proper earthing shall be provided in all the electrical</li> </ul>	<ul style="list-style-type: none"> <li>(i) Reactors are connected to chilled brine condensers system.</li> <li>(ii) Mechanical seals are provided to prevent leakages.</li> <li>(iii) Solvent recovery for all solvent achieved more than 95% recovery by providing sufficient heat transfer area and residence time to the condensers.</li> <li>(iv) Solvent storage separated with compliance of PESO guideline. <ul style="list-style-type: none"> <li>- Dyke wall.</li> <li>- Nitrogen blanketing.</li> <li>- Flame Proof fittings</li> <li>- Required permissions and distances from adjacent building.</li> <li>- Fencing arrangement.</li> </ul> </li> </ul>





S. No.	Conditions	Compliance Status
	<p>equipment wherever solvent handling is done.</p> <p>(vi) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.</p> <p>All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.</p>	<p>- Controlled entries in solvent tanks</p> <p>(v) Proper earthing as per Indian standard and PESO guidelines and IS 600079 have been provided.</p> <p>(vi) Entire plant is classified under hazardous area classification (IS5572) &amp; provided flameproof equipment accordingly. The solvent storage tanks are provided with Nitrogen blanketing (PCV &amp; PRV) &amp; flame arrestor</p> <p>The solvent storage tanks are provided with Nitrogen blanketing (PCV &amp; PRV) &amp; flame arrestor.</p>
(g)	<p>Total freshwater requirement shall not exceed 17933 cum/day to be met from GIDC supply. Prior permission in this regard shall be obtained from concerned regulatory authority/CGWA.</p>	<p>In last six months (Jun-22 to Nov-22), average water consumption 8671 KLD. 4499 KLD treated effluent (ETP RO &amp; Utility RO Permeate) is reused in cooling tower makeup. The water consumption detail is attached as per <b>Annexure - 15</b>.</p> <p>We have taken prior permission from GIDC for water supply of 9000 KLD. Entire quantity is metered through meter, monthly billing done on metered quantity. The Copy of GIDC permission for Water Consumption is shown below;</p> <p>Copy of GIDC permission for Water Consumption attached herewith.</p> <div data-bbox="821 1100 1192 1614" style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;">  <b>GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION</b>  <small>(A Govt. of Gujarat Undertaking)  Office of the Executive Engineer  Public Relation &amp; Environment Cell  M.G. Road, Fuzhahra, Bhavnar-370001  Phone: (079)2214264/24144 (F) (R)2424420</small> </p> <p> GIDC/P/EE/VS/BR/II/39-P-3      Date:- 14 / 6 / 2020 </p> <p> <b>To:</b>  M/s. Sachin Water Supply Co. Pvt. Ltd.,  Site Office,  GIDC, Dabhoi </p> <p> <b>Sub:</b> Water Supply connection for M/s. SRF Ltd., Plot No.23/1 at Dabhoi II Industrial Estate.  <b>Ref:</b> The allotment application dtd:- 01/05/2019. </p> <p>Dear Sir,</p> <p>With reference to the above, it is to state that this office has issued the water connection release order against the letter under reference.</p> <p>It is certification this is to confirm that the party's connection is enhanced from 6500.00 KLPD to 9000.00 KLPD and GPCB clearance is 14,017.00 KLPD. The water is to be drawn from the 17 MGD rising main line connecting Bhavnar to Dabhoi - I reservoir and the connection site remains same (i.e. 350mm diameter) and water meter size also remains same (300mm diameter). The plot site according to the area corresponding letter is 15,81,250.35(7) Sq.mts.</p> <p>This is for your information please.</p> <p>Yours faithfully,</p> <p>   <b>Dy. Ex. Engineer (vs),  GIDC, Bhavnar</b> </p> <p> <b>Copy to:</b>  1. The Executive Engineer (W/D), GIDC, Bhavnar...      for information please.  2. The Executive Engineer (MAE), GIDC, Bhavnar...      for information please. </p> <p> <b>Copy to:</b>  M/s. SRF Ltd.,      For information.  Plot No. 23/1,  Dabhoi - II Industrial Estate,  2. The DevInfo Tech Ltd, Bhavnar...      For information &amp; necessary actions. </p> </div>
(h)	<p>Industrial/trade effluent shall be segregated into High COD/TDS and Low COD/TDS effluent streams. High TDS/COD shall be passed through stripper followed by MEE and ATFD (agitated thin film drier).</p>	<p>For treatment of wastewater (including heavy metal, fluoride, etc.) all Industrial Trade effluent generated at our site is being segregated in four different stream,</p> <ol style="list-style-type: none"> <li>1) High COD/TDS Stream</li> <li>2) Low COD/TDS Stream</li> <li>3) Utility Effluent Stream</li> <li>4) Sewage</li> <li>5) Fluoride Treatment</li> </ol>



S. No.	Conditions	Compliance Status
	<p>Low TDS effluent stream shall be treated in ETP and then passed through RO system.</p>	<p>High COD/TDS: Settler Separator → Equalization → Neutralization → Stripper → Multi Effect Evaporator → ATFD.</p> <p>Low COD/TDS: Settler Separator → Equalization → Neutralization → Flocculator → Flash Mixer → Primary Settler → Trickling Filter → Aeration Tank → Secondary Settler → Tertiary Treatment → Ultrafiltration → Reverse Osmosis → Final Discharge.</p> <p>Utility effluent (from DM Reject, Cooling Tower Blow Down, and Softener Reject) is treated through Physico-chemical → Ultra-filtration → Reverse Osmosis System → Reuse in Cooling Tower.</p> <p>Sewage is treated through separate sewage treatment plant.</p> <p>High Fluoride Treatment: Equalization Tank → Hydrated Lime addition → Primary Settler → CaF Sludge removed through Press Filter → Clear Overflow goes to final treated effluent collection tank. CaF dried sludge used in Fluorospar as Raw Material in manufacturing of AHF and/or disposed to secured landfill site.</p> <p>Detailed photographs of effluent treatment infrastructure are attached herewith as <b>Annexure-17</b>.</p>
(i)	<p>Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.</p>	<p>All material transfers are through closed pipelines and dedicated transferring systems. To avoid mixing of accidental spillage of chemicals process plants have been provided with separate drains like – process effluent collection with pump arrangement. Plant washings gets collected in wash pits. Steam condensate pits are also separate from plant effluents. Storm water drain is constructed separately for storm water only.</p>
(j)	<p>Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and solvent transfer through pumps.</p>	<p>Hazardous chemicals are stored in designated tanks. Tank, drums, carboys etc. stored as per chemical compatibility, material of constructions and PESO guideline.</p> <p>Storage conditions suggested in MSDS are being followed while deciding storage areas.</p> <p>Drums and carboys are also stored as per compatibility. Heat sensitive materials are kept in closed and well-ventilated areas.</p>

S. No.	Conditions	Compliance Status
		Flame arresters are provided on storage tanks. Solvent transfer activity happens in close loop through pumps.
(k)	Process organic residue and spent carbon if any shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.	<p>ETP Sludge, Process Inorganic &amp; evaporation salt is disposed off to designated TSDF site (Bharuch Enviro Infrastructure Limited Dahej and Safe Enviro Pvt Ltd, Jambusar with followed by Haz. and Other Waste Rule 2016.</p> <p>Process organic residue, Spent Catalyst, Spent Solvent and spent carbon disposal to Cement Industry directly and sent to Pre-processing/Co-processing unit (RSPL, Panoli)/ CHWIF, Ambuja Cement, Shree Cement, JK Lakshmi Cement, Ultratech cement) with followed by Haz. and Other Waste Rule 2016.</p> <p>Membership Certificates are shown below;</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%; border: 1px solid black; padding: 5px;">  </div> <div style="width: 50%; border: 1px solid black; padding: 5px;">  </div> <div style="width: 50%; border: 1px solid black; padding: 5px;">  </div> <div style="width: 50%; border: 1px solid black; padding: 5px;">  </div> </div>
(l)	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	We SRF limited are strictly complying the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time and all transportation of Hazardous Chemicals are as per the Motor Vehicle Act (MVA), 1989. Haz chemical storage, handling and control details are attached as per <b>Annexure - 14.</b>




S. No.	Conditions	Compliance Status
	per the Motor Vehicle Act (MVA), 1989.	<p>We are strictly following applicable provisions of MSIHC rules.</p> <ul style="list-style-type: none"> <li>- Audit</li> <li>- Onsite emergency plan.</li> <li>- Reporting of Major accident.</li> <li>- Safety audits</li> <li>- Labelling of vehicles.</li> </ul> <p>All vehicles are with GPS System for hazardous Waste transportation.</p>
(n)	<p>The company shall undertake waste minimization measures as below: -</p> <ul style="list-style-type: none"> <li>(i) Metering and control of quantities of active ingredients to minimize waste.</li> <li>(ii) Reuse of by-product from the process as raw material or as raw material substitutes in other processes.</li> <li>(iii) Use automated filling to minimize spillage.</li> <li>(iv) Use closed feed system in to batch reactors.</li> <li>(v) Use of high-pressure hoses for equipment cleaning to reduce wastewater generation.</li> </ul>	<p>Waste minimization measures taken as follow;</p> <ul style="list-style-type: none"> <li>(i) We have installed flow meters, load cell &amp; Level transmitter for metering &amp; control of active ingredient</li> <li>(ii) Re-use by-products as raw material like NH<sub>3</sub> solution, 30% HCl, Hypo, wherever applicable.</li> <li>(iii) All filling machine are provided with automated filling facility to avoid spillage.</li> <li>(iv) All ingredient feed to reactor in close feed system like Pipeline, Powder transferring system.</li> <li>(v) Using high pressure jet machine &amp; spray ball for cleaning to generate low wastewater</li> </ul> <p>Photographs attached herewith.</p> <div style="display: flex; flex-wrap: wrap;">     </div>

	The green belt of 5 to 10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along roadsides etc. Selection of plant species shall be as per the CPCB guideline and in consultation with the State Forest Department.	The unit has developed the greenbelt of 19% within the premises and will develop around 17% greenbelt at an adjacent alternative land given by GIDC. The MoU is already signed with GIDC to develop greenbelt outside the premises. Around 35000 nos. of trees are already planted at an alternative adjacent GIDC land and planting more. The photographs of existing greenbelt are attached as per <b>Annexure - 30</b>																								
(p)	At least 2.5% of the total project cost shall be allocated for Enterprise Social Commitment and the details along with time bound action plan shall be submitted to the Ministry's Regional Office.	We have spent around INR 43 crores towards corporate social responsibility in last 3 years. In addition to for any expansion, we will comply to the MoEFCC office memorandum No. 22-65/2017-IA.III dated 30/09/2020.  In FY 21-22 (Apr 2021 to Mar 2022), we have spent INR 486 Lakhs in surrounding villages nearer Dahej plant..																								
(q)	For the DG sets, emission limits and stack height shall be in conformity with the extant regulations and the CPCB guideline. Acoustic enclosure shall be provided to DG sets for controlling the noise pollution.	We have provided adequate stack height to the D.G. Sets as per the CPCB guideline also emission standards of noise and air is being maintained within the CPCB prescribed limits. Workplace noise monitoring is carried out on six monthly.  DG Sets Stack Height is shown in below table; <table border="1" data-bbox="836 1008 1429 1344"> <thead> <tr> <th>Sr. No.</th> <th>DG Sets</th> <th>Height (MTR)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>DG Set-1 500 KW</td> <td>11</td> </tr> <tr> <td>2</td> <td>DG Set-2 500 KW</td> <td>11</td> </tr> <tr> <td>3</td> <td>DG Set-3 840 KW</td> <td>30</td> </tr> <tr> <td>4</td> <td>DG Set-4 840 KW</td> <td>30</td> </tr> <tr> <td>5</td> <td>DG Sets 4200 KVA</td> <td>30</td> </tr> <tr> <td>6</td> <td>DG Sets 4200 KVA</td> <td>30</td> </tr> <tr> <td>7</td> <td>DG Sets 4200 KVA</td> <td>30</td> </tr> </tbody> </table> DG Sets stack emission report attached as <b>Annexure-23</b> .	Sr. No.	DG Sets	Height (MTR)	1	DG Set-1 500 KW	11	2	DG Set-2 500 KW	11	3	DG Set-3 840 KW	30	4	DG Set-4 840 KW	30	5	DG Sets 4200 KVA	30	6	DG Sets 4200 KVA	30	7	DG Sets 4200 KVA	30
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(r)	The unit shall make arrangement for protection of possible fire hazards during manufacturing process in material handling. Firefighting system shall be as per the norms.	We have maintained firefighting protection systems of possible fire hazards during manufacturing process in material handling.  Below firefighting equipment are available for fire prevention and fire protection:																								





		<div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;"><b>Fire Equipment list</b></p> <p><b>Fire Fighting System (Fire hydrant System )</b> Fire hydrant system is operational with working pressure of 8.0 kg/cm<sup>2</sup> g. Jockey Pump maintains pressure of the fire hydrant network. The fire hydrant is forming main ring in which water is available from two sides.</p> <p><b>Working of Fire hydrant System</b></p> <ol style="list-style-type: none"> <li>In case of pressure drops, jockey pumps No-1 starts at 8 kg/ cm<sup>2</sup> g pressure and maintains 8.8 kg/ cm<sup>2</sup> g pressure in the hydrant line.</li> <li>In case of any emergency when hydrant line pressure drops below 7 kg/ cm<sup>2</sup> g and Jockey pump is not able to maintain the pressure in line, Diesel (engine) pump no.1 starts at 7 kg/ cm<sup>2</sup> g and it provide the required water for fire fighting.</li> <li>If Diesel (engine) pump no.1 is not able to start &amp; pressure drops below 6.5 kg/ cm<sup>2</sup> g, Diesel (engine) pump no.2 starts at 6.5 kg/ cm<sup>2</sup> g automatically.</li> <li>Pumps can only be stopped from the Pump house.</li> </ol> <p><b>Details of Fire hydrant system</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>SN</th> <th>Item Description</th> <th>Nos. 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Fire extinguishers selection has been made according to class of fire in the area. Capacity and Quantity of Fire extinguishers have been decided according to floor area.</p> <p><b>Summary of Fire extinguishers available at the site:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>SN</th> <th>Type of Extinguisher</th> <th>Nos. available</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ABC</td> <td style="text-align: center;">985</td> </tr> <tr> <td>2</td> <td>DCP</td> <td style="text-align: center;">429</td> </tr> <tr> <td>3</td> <td>Mech Foam</td> <td style="text-align: center;">472</td> </tr> <tr> <td>4</td> <td>CO<sub>2</sub></td> <td style="text-align: center;">491</td> </tr> <tr> <td>5</td> <td>K-Type</td> <td style="text-align: center;">4</td> </tr> <tr> <td><b>Total</b></td> <td></td> <td style="text-align: center;"><b>2381</b></td> </tr> </tbody> </table> </div>	SN	Item Description	Nos. 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(s)	Occupational health surveillance of the workers shall be done on regular basis and records maintained as per the Factories Act.	The health surveillance is carried out for all the employees. The sample records are shown in <b>Annexure-32</b> ;																																																																														
t)	Raw material storage should not exceed 3 days at any point of time.	We have obtained amendment in our EC for raw material storage vide letter no.: F. No. J-11011/379/2016-IA II (I) dated 15-Oct-20. Copy attached for your reference <b>as per Annexure-33</b> .  We are storing all the Raw materials in a safe manner at any point of time.																																																																														
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(i)	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.	We are adhering to requirement made by GPCB and other statutory authority as per consent no. GPCB/BRCH-B/CCA-38(19)/ID-24521/678954 dated 26/07/2022.																																																																														
(ii)	No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change. In case of deviations or alterations in the project	Expansions will be done after taking permissions from MoEFCC/SEIAA.																																																																														

	<p>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 measure required, if any.</p>	
(iii)	<p>The location 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 station each is installed in the upwind and downwind as well as where maximum ground level concentration are anticipated.</p>	<p>Ambient Air Quality Monitoring is carried out on monthly basis in the impact zone (up-wind and down-wind). The report is attached herewith as per <b>Annexure-3</b>.</p> <p>Locations of Ambient air quality monitoring stations marked in plot plan- <b>Annexure-3</b>.</p>
(iv)	<p>The National Ambient Air Quality Emission Standard issued by the Ministry vide G.S.R. No. 826 (E) dated 16<sup>th</sup> November, 2009 shall be complied with.</p>	<p>Ambient Air Quality Monitoring carried out in the impact zone (up-wind and down-wind) and its records are submitted regularly to RO GPCB, Bharuch. Copy of record submission is shown below;</p> 
(v)	<p>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 source of noise generation. The ambient noise levels shall conform to be standards prescribed under Environment (protection) Act, 1986 rules, 1989 viz. 75 dBA (daytime) and 70 dBA (nighttime).</p>	<p>To control noise level, we have provided acoustic enclosures in all four DG sets, segregation of utility areas.</p> <p>Based on noise level sitting arrangements have been done in separate areas to minimize personal exposure.</p> <p>To minimize noise pollution vibrating pads, low noise making machineries have been provided.</p> <p>Ambient noise monitoring level is being checked on monthly basis to check efficiency of controls.</p> <p>The personal protective equipment (PPE) is provided to workers &amp; employees working in noisy areas.</p>

		Ambient Noise Monitoring Report attached herewith <b>Annexure- 22.</b>
(vi)	The Company shall harvest rainwater from the rooftops of the building and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.	The rooftop rainwater transfers through storm water drain to storm water collection sump. We have arrangement of rainwater transferred from 50 KL collection tank to Utility RO for re-using in cooling tower.
(vii)	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examination for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Regular training of workers and staff is conducted on Safety and Health aspects for chemical handling. Our training center is approved by Gujrat State government under Rule- 111A. We have dedicated manpower & facility for imparting training on EHS aspects. Below is the training summary sheet of May-22 of employees and contractors. Training summary sheet is attaches <b>as per Annexure – 28.</b>  Periodical medical examination for all workers is being done at the time of joining and subsequently medical exam at the frequency of once in six months.
(viii)	The Company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendation made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing shall be implemented.	SRF Limited is complying following recommendation made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing. <ol style="list-style-type: none"> <li>1. Established wastewater treatment facility and online monitoring equipment.</li> <li>2. Provided continuous emission monitoring system for flue gas.</li> <li>3. Provided gas detectors in Raw Material storage area.</li> <li>4. All necessary PPEs is providing to workers.</li> <li>5. Provided Hazardous Waste Storage Facility separately.</li> <li>6. Developed 30 – 50 m width greenbelt to factory periphery.</li> <li>7. Environmental Laboratory established for Wastewater analysis and monitoring.</li> <li>8. Environmental Monitoring is being done on regular basis by NABL and MoEF approved laboratory.</li> <li>9. Fugitive emission and Workplace monitoring is being done on regularly basis.</li> <li>10. Separate environmental monitoring cell.</li> <li>11. Allocated earmarked capital and operation budget for environmental activity.</li> <li>12. CSR fund allocated for socio economic development.</li> <li>13. HSE management system is implemented.</li> </ol>

		<p>14. Process hazard analysis and HAZOP study is being conducted for each process.</p> <p>15. Periodic On-Site Emergency Mock Drills and occasional Off-Site Emergency Mock Drills is being conducted, so those staffs are trained and are in a state of preparedness to tackle any emergency.</p>
(ix)	<p>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 stake holders. Also, eco-development measures shall be undertaken for overall improvement of the environment.</p>	<p>We have spent around INR 43 crores towards infrastructure development, rural education program, sanitation, swachta kit, drinking water facilities in last three years.</p> <p>In FY 21-22 (Apr 2021 to Mar 2022), we have spent INR 486 Lakhs in surrounding villages nearer Dahej plant. The CSR activity details are attached <b>as per Annexure-31</b>.</p>
(x)	<p>A separate environment management cell equipped with full-fledged laboratory facilities shall be set up to carry out the environmental management and monitoring functions.</p>	<p>We have separate Environmental Management Cell equipped with full-flagged environmental laboratory facility to carry out environmental management and monitoring function. The report of this group is directly to head of the location.</p> <p>Lab equipment's available on laboratory: Spectrometer, DO meter, BOD Incubator, pH meter, TDS/Conductivity Meter, TOC/TN analyzer, Ammonical Nitrogen Distillation Equipment, Fluoride and Ammonium Ion meter etc.</p>
(xi)	<p>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 the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measure shall not be diverted for any other purpose.</p>	<p>Company has earmarked sufficient funds towards capital cost and recurring cost every year to meet/compliance the stipulated conditions by the Ministry of Environment, Forest and Climate Change as well as the State Government.</p> <p>Company has spent INR 4.42 crore toward capital investment in ETP &amp; INR 80+ crores in operation.</p>
(xii)	<p>A copy of the clearance letter shall be sent by the project proponent to concern Panchayat, Zila Parishad / Municipal Corporation, Urban local Body, and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.</p>	<p>We have submitted the Environmental Clearance letter. There are no suggestions/ representations till date.</p> <p>Copy of the letter is shown below.</p>

		
<p>(xiii)</p>	<p>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&amp;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.</p>	<p>Six Monthly reports on Environmental Clearance conditions status submitted regularly to respective Regional Office of MoEF&amp;CC, the respective Zonal office of CPCB and SPCB and six-monthly compliance status reports posted on the company website <a href="http://www.srf.com">www.srf.com</a>.</p> 
<p>(xiv)</p>	<p>The environmental statement for each financial year ending 31<sup>st</sup> 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 respective Regional offices of MoEF&amp;CC by e-mail.</p>	<p>The environmental statement for each financial year ending 31<sup>st</sup> March in Form -V submitted to the board.</p> <p>Copy of the same is enclosed herewith as per <b>Annexure- 34.</b></p>

(xv)	<p>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 <a href="http://moef.nic.in">http://moef.nic.in</a>. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional office of the Ministry.</p>	<p>The condition regarding information the public about the accorded environmental clearance by the MoEF had published in local newspaper.</p> <p>Copy of each of the same forwarded to the concerned Regional Office of the Ministry.</p> <p>Copy of advertise &amp; submitted to concerned Regional Office of the Ministry is attached as per <b>Annexure-35</b>.</p>
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