

Nov 25, 2021

ENV/14/21/2511

Additional Principal Chief Conservator of Forests (C), Ministry of Environment, Forests & Climate Change E-5, Kendriya Paryavaran Bhavan Link Road No.3

Ravi Shankar Nagar

Bhopal-462016

Sub: Compliance report for the period (April 2021 to September 2021)

Ref: Environmental Clearance no. J-11011/300/2015-IA II (I) dated

March 28, 2017 and its amendment dated February 21, 2018.

Dear Sir,

Enclosed is the compliance report of Environmental Clearance for the period (April 2021 to September 2021).

We hope you will find the same in order.

Thanking you,

Yours faithfully,

For Bayer Vapi Private Limited

(Formerly Bilag Industries Private Limited)

Narendra K Shah

Director & Site Manager

CC:

Na Stated

- 1. Deputy Chief Environment Engineer, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector-10 A Gandhinagar (GPCB ID:23225)
- 2. Zonal Officer, Central-Pollution Control Board, Parivesh Bhawan, Opp-VMC ward office No.10, Subhanpura, Vadodara-390023

Bayer Vapi Private Limited (Formerly Bilag Industries Pvt. Ltd)

Registered Office & Factory Plot No. 306/3, II Phase, GIDC, Vapi – 396 195, Gujarat, India

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		SAYER VAPI PVT, LT	D.					
	EC No: J-11011/300/2015-IA.II (I)	Compliance Status	Report (April'21 - 9	ieptember'	21)		
.No.	EC Conditions	Carrie Street		Co	mpliance S	tatus		
PECIF.	IC CONDITIONS National Emission Standards for Pesticide Manufacturing	The emission star	adard for	postisidos	industry	une amand	lad on lu	no 12, 2011
	and Formulation Industry issued by the Ministry vide G.S.R. 46(E) dated 3rd February, 2006 and amended time to time shall be followed by the unit.	being followed. E	mission f tory on m	rom incine	erator stack iis. The mor	s are moninitored val	itored by ues of em	MoEF&CC and
		Parameters (PM (mg/Nm3)	HCI (mg/Nm3)	SO ₂ (mg/Nm3)	HF (mg/Nm3)	NOx (mg/Nm3	& Furanc
		Month / Limit				4		0.1
		Apr-21	30.52	3.20	20.55	2.12	35.65	-
		May-21	27.62	3.12	20.37	1.28	38.72	-
		Jun-21	27.63	3.34	21.06	0.96	35.35	0.02
		Jul-21	28.34	3.24	22.58	1.14	40.29	
								-
		Aug-21	29.42	3.36	21.01	2.25	37.59	-
		Sep-21	27.62	3.12	20.82	2.55	40.53	-
		Parame		(mg/	Nm3)	SO ₂ (ppm	1)	NOx (ppm)
		Month /		15 NI	the same of the same of	3.46		50 28.72
		May-		NI		4.01		28.46
		Jun-2 Jul-2		NI NI		3.65	_	24.97
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		Sep-2	21	NI NI		3.17 4.14	7	
3	Two stage water scrubber followed by alkali scrubber shall be provided to process vent to control process emissions viz. HCl, SO2, Cl2, NOx, HBr. The scrubbed water should be sent to ETP for further treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. Scrubbers vent shall be provided with online detection and alarm system to indicate higher than permissible value of controlled parameters. At no time, the emission levels shall go beyond the prescribed standards. The system should be interlocked with the pollution control	* ND= Not Detector * ND= Not Detector 1.Two stage scrul 5 Online pH meter is 2. Scrubber water 3. Efficiency of maintaining concominate in the concomination of photostate in the concomin	ed bbers are s provide is treated scrubber entration lution cor process ve ored valu	e provided d in scrubb d in Evapor is being of scrubb atrol equip ent and states of last 6	to control oing system ator follow monitore er solution. ment has b ick is carrie months ar	process e . ed by Efflu d by mea The onlineen provid d out by M e as under	emissions emissions ent Treat asuring o e detection led for HC noEF&CC	29.46 26.83 from process ment Plant. butlet emissio on alarm syste
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		AYER VAPI PVT, LTD.
	EC No: J-11011/300/2015-JA.II (J)	Compliance Status Report (April'21 - September'21)
Sr.No.	EC Conditions	Compliance Status
4	from all the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system	Double mechanical seal / magnetic seal less pumps are used for solvent transfer Installed 20 mbar nitrogen blanketing system Vent of entire plant storage vessels, reactors, condensers and any other equipment are connected to a common header Work area monitoring carried out regularly for various chemiclas used at site
5	pesticide industry shall be prepared and implemented as per CPCB guidelines. Focus shall be given for prevention of	Around 200 nos. of detectors based on detection principle have been installed in all areas where there is a likelihood of HC leakages from pumps and other equipment. LDAR Study
6	Company shall take all the measures in order to protect the machineries and equipment for pesticide producing unit from ageing.	1. Regular maintenance of pesticide producing machineries and equipment are carried out. 2. Testing of all vessels / rectors are carried out by competent person at defined frequency. 3. Equipment are selected based on process requirement.
7	as VOCs shall be installed at all important places/areas. Effective measures shall be taken immediately, when	

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	B	AYER VAIPI PVT. LTD.			
	EC No: J-11011/300/2015-IA.II (I)	Compliance Status Report (April'21 - September'21)			
Sr.No.	EC Conditions	Compliance Status			
8	through adequate stack height as per CPCB standards.	Site has provided adequate stack height to control gaseous emissions from DG. DG sets are installed as per CPCB guideline. As a precautionary measure, adequate PPEs like ear plug / ear muff is provided to employee at the entry point of DG house.			
9	Solvent management shall be carried out as follows: 1. Chilled brine circulation system shall be provided to condensate solvent vapors and reduce solvent losses. It shall be ensured that solvent recovery should not be less than 95%. 2. Reactor and solvent handling pump shall have mechanical seals to prevent leakages. 3. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery 4. Solvents shall be stored in a separate space specified with all safety measures. 5. Proper earthling shall be provided in all the electrical equipment wherever solvent handling is done. 6. Entire plant shall be flame proof. The solvent storage tanks should be provided with breather valve to prevent losses.				
10	Total water requirement from GIDC water supply shall not exceed 2900 m3/day and prior permission should be obtained from the Competent authority.				

Industrial effluent generation shall not exceed 900 m3/day. The wastewater is segregated based on COD, TDS and BOD / COD ratio. The wastewater 11 As proposed, wastewater will be segregated at source and generation philosophy is as under: treated based on its characteristics viz High COD & High TDS and Low COD & Low TDS. High COD & High TDS effluents will be sent to MEE followed by RO while Low COD & Low TDS effluents will be treated in ETP followed by RO. The treated wastewater shall be discharged to Common Effluent Treatment Plant (CETP) for final treatment. Final effluent discharge is being monitored daily for pH, COD, BOD, TSS, NH3-N. Online analyser is provided at the discharge point of treated effluent. The analyser is connected with GPCB / CPCB server for transferring online data. The auto shut off valve provided at the discharge point of treated effluent stops the discharge incase of exceedance of parameters. Last six month effluent generation quantity and quality are as under: Average Effluent NH3-N Parameters Discharged (mg/L) to CETP (KLD) 389 72 28 5.84 7.48 445 61 23 620 75 17 5.69 689 69 21 3.78 632 79 27 6.13 704 65 23 7.98 All results are within the prescribed limit. The treated effluent is discharged to Common Effluent Treatment Plant (CETP) through GIDC underground drainage system operated by Vapi Green Enviro Private Limited (Formerly known as Vapi Waste and Effluent Management Company Limited). 12 Process effluent / any wastewater shall not be allowed to Site has separate collection system for effluent and storm water. The capacity of guard mix with storm water. Storm water drain shall be passed ponds are 3000 KI & 1800 KI respectively. through guard pond. 13 Hazardous chemicals shall be stored in tanks in tank farms, 1. All hazardous chemicals are stored in tanks. drums, carboys etc. Flame arresters shall be provided on 2. Adequate number of flame arrestor have been provided. 3. Double mechanical seal / seal less pumps are used for solvent transfer. tank farm. Solvent transfer shall be by pumps. 14 The by-products which fall under the purview of the The site has authorisation for collection, storage and disposal of by-products falling Hazardous Waste Rules, be handled as per the provisions of under the the Hazardous Waste (Management, Handling and Trans- Boundary the said Rules and necessary permissions shall be obtained Movement) Rules, 2016 valid up to September 30, 2021. under the said Rules.

	EC No: J-11011/300/2015-IA.II (I)	Compliance Status Report (April'21 - September'21)
Sr.No.	EC Conditions	Compliance Status
15	storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-	Pollwing measures are taken by site for fire fighting in case of emergency: 24 X 7 availability of trained fire fighter Fire Hydrant system Sprinkler System
16		1.ETP sludge, inorganic waste is sent to the authorised TSDF sites operated by Saurasthra Enviro Projects Pvt Ltd. (SEPPL); Vapi Green Enviro Limited (formerly Known as Vapi waste & Effluent Mgt. Co. Ltd). 2.High calorific value waste is incinerated in in-house incineration facility as well as sent to common Hazardous Waste Incineration Facilities (CHWIF) operated by Saurasthra Enviro Projects Pvt Ltd. (SEPPL) / sent for Co processing to Recycling Solutions Pvt. Ltd (RSPL) / Bharuch Enviro Infrastructure Limited (BEIL).
17	guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended in October, 1994 and January, 2000. All Transportation of	The mock drill is carried out regularly. Last mock drill was carried out on June, 2021. The transportation of hazardous chemicals as per Motor Vehicle Act shall be complied.
		Mockdrill
18	possible fire hazards during manufacturing process in	The following measures are taken for protection of fire hazard: 1. Awareness of process and plant safety guideline among all employees 2. Hazardous Area Classification and Risk Assessment (HACRA) for each plant 3. Double earthing is provided in each tank 4. Nitrogen blanketing is provided to all tanks of flammable solvents 5. Spark arresters are provided to vehicles entering in the tank farm 6. The flame proof electrical equipment are provided in the flammable area 7. Full Fledged Emergency Control center available at site including centralized smoke detection system and 03 fire tenders 8. Fire Hydrant system 9. 24 X 7 availability of trained fire fighters 10. Fixed fire protection system

and records are maintained in Form No. 32 and pre-employee medical examinate records are maintained in Form No. 33. **Quarted/ Wealcal/Check-up of Employees** Annual/Wealcal/Camps for Employees** Annual/Wealcal/Camps for Employees** Annual/Wealcal/Camps for Employees** The company has developed green area of around 5.2 hectares inside the premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Selection of plant species should be as per the CPCB guidelines. The company has developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site premises. The company has also developed green area adjacent to site pr			IR V/API PVT. LTD.
Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act. The site has full fledged Occupational Health related surveillance and swareness programs factories Act. Green belt should be developed at least in 10.6 ha area in the company has developed green area of around 5.2 hectares inside the pand around the plant premises to mitigate the effects of premises. The company has also developed green area adjacent to site premises fugitive emissions all around the plant as per the CPCB guidelines. Green belt should be developed at least in 10.6 ha area in the company has developed green area of around 5.2 hectares inside the pand around the plant premises to mitigate the effects of premises. The company has also developed green area adjacent to site premises fugitive emissions all around the plant as per the CPCB guidelines in consultation with DPC. Selection of plant species should be as per the CPCB guidelines. Selection of plant species as per CPCB guidelines and communicated to DPC our letter No. ENVIOS/18/2702 dated February 27, 2018 for further advice. Every plantation is carried out to increase the greenbelt area inside and outside of premises. Gross Bisis litera belows grown. At least 2.5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at 8hopal implementation of such program shall be ensured accordingly in a time bound manner		EC No: J-11011/300/2015-IA.II (I) Con	mpliance Status Report (April'21 - September'21)
done on a regular basis and records maintained as per the Factories Act. 20 Green belt should be developed at least in 10.6 ha area in the company has developed green area of around 5.2 hectares inside the pand around the plant premises to mitigate the effects of premises. The company has also developed green area adjacent to site premises, fugitive emissions all around the plant as per the CPCB guidelines in consultation with DFO. Selection of plant passes should be as per the CPCB guidelines. 21 At least 2.5 % of the total cost of the project shall be carmarked towards the Enterprise Social Commitment has a carmed out to increase the greenbelt area inside and outside of premises. 22 At least 2.5 % of the total cost of the project shall be site was exempted from Public hearing as per section 7(i), ill stage (3), para (i)(b) of a carmarked towards the Enterprise Social Commitment to be build action plant passes and item-wise details along with time bound action plant passes and item-wise details along with time bound action plant passes and item-wise details along with time bound action plant passes and item-wise details along with time bound action plant plant program shall be prepared and submitted to the Ministry's Regional Office at Bhopal implementation of such program shall be prepared and submitted to the Ministry's Regional Office at Bhopal implementation of such program shall be ensured accordingly in a time bound action of an accordingly in a time bound action of accordingly in a time bound action.	Sr.No.	EC Conditions	Compliance Status
and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB green belt development work is in progress in newly purchased land of 5.4 hectares. guidelines in consultation with DFO. Selection of plant species should be as per the CPCB guidelines. At least 2.5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program shall be ensured accordingly in a time bound manner 21 All the recommendations made in the risk assessment Shall be complied	19	done on a regular basis and records maintained as per the Factories Act. and records maintained as per the car and records maintained maintai	ficer (FMO). Occupational health related surveillance and awareness programs are rried out regularly. Periodical medical examinations are carried out for all employees id records are maintained in Form No. 32 and pre-employee medical examination cords are maintained in Form No. 33.
and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB green belt development work is in progress in newly purchased land of 5.4 hectares. guidelines in consultation with DFO. Selection of plant species should be as per the CPCB guidelines. At least 2.5 % of the total cost of the project shall be earmarked towards the Enterprise Social Commitment based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program shall be ensured accordingly in a time bound manner At let recommendations made in the risk assessment Shall be complied Shall be complied			
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earmarked towards the Enterprise Social Commitment based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program shall be ensured accordingly in a time bound manner All the recommendations made in the risk assessment Shall be complied			Green Belt Area Development
	21	earmarked towards the Enterprise Social Commitment based on Public Hearing issues and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office at Bhopal. Implementation of such program shall be ensured	
	22		all be complied

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The unit shall ensure Zero Liquid Discharge (ZLD) for the Last six months recycle treated effluents are as under: expanded capacity by recycling the treated effleunt. Quantity Recycled **Average Quantity** (KL) Recycled (KL / Day) 5066 169 4850 156 4793 160 6729 217 7641 246 7376 246 Continuous online (24 x 7) monitoring to be installed for Online monitoring station (24 x 7) is installed for monitoring flow, pH, TOC and TSS for 24 flow measurement and measurement of pollutants within treated effluent discharged to CETP. The online monitoring system is connected with the treatment unit. Data to be uploaded on company's GPCB & CPCB server. website and provided to respective RO of MoEF&CC, CPCB and SPCB. **B. GENERAL CONDITIONS** The project authorities shall strictly adhere to the The company follows all stipulations made by State Pollution Control Board (SPCB). stipulations made by the state Pollution Control Board(SPCB), State Government and any other statutory 2 No further expansion or modifications in the plant shall be Shall be followed. carried without prior approval of the Ministry of Environment and Forest. In case of deviations alterations in the project proposal from those submitted to this Ministry of clearance, a fresh reference shall be made to Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if The locations of ambient air quality monitoring stations We have already installed 05 Nos. of ambient air quality monitoring station at site. The 3 shall be decided in consultation with the State Pollution locations are marked in Site Layout. The ambient air quality monitoring stations are Control Board (SPCB) and it shall be ensured that at least based on prominent wind direction i.e. one is in upwind direction and remaining fours one station is installed in the upwind and downwind are in downwind direction. The same was informed to GPCB through letter No. direction as well as where maximum ground level ENV/06/17/1307 dated July 13, 2017. concentration are anticipated.

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	EC No: J-11011/300/2015-IA.II (I) (itatus Rej	oort (April'21 -	September'21)			
Sr.No.	EC Conditions			C	ompliance Stat	us		
4	The national Ambient Air Quality Emission standards issued by Ministry vide G.S.R NO. 826 (E) dated 16th November, every month by MoEF&CC and NABL accredited laboratory. Monitored values of months are as under:							
		Ambi Param		Quality Mor PM ₁₀	nitoring (Ap	ril'21 to Sep Sulphur Dioxide (SO ₂)	Oxides of Nitrogen	
		Un		µg/m3	μg/m3	µg/m3	µg/m3	
		Month Apr		100 58.05	60 28.09	80 19.29	31.07	
		May		66.63	33.40	17.90	26.95	
		Jun		59.41	29.16	15.47	23.91	
		Jul-	-	64.12	32.34	14.21	24.22	
		Aug	-21	58.58	28.43	11.36	21.03	
		Sep	-21	73.13	36.99	16.25	26.96	
	levels shall conform to the standards prescribed under Environment (Protection) Act,1986 Rules,1989 viz. 75 dBA (day time) and 70 dBA (night time)	Sr.No.		Locatio Limit	n de la companya de l	Day Time (dBA) 75 dB(A)	Night Time (dBA) 70 dB(A)	
				Month / Loc	ation	Average	Average	
		1.	Near N	/lain Gate		65.23	61.43	
		2	Near A	dmin Build	ing	63.83	61.07	
		3	Near E	FSO Plant		66.22	60.87	
		4	Near A	LCO Plant		63.33	58.77	
		5	Nearh	ncinerator-2		68.47	64.93	
		6	Near h	ncinerator-3	3	65.78	62.57	
		7	Near S	crap Yard		61.83	59.33	
		8	Near H	IICO-I		65.85	63.47	
		9		YFO Plant		64.62	57.60	
		10	Near G			57.97	55.63	
		11		ngineering	Part Store	56.52	57.37	
		12	NearE	TP		66.45	62.20	
6	The unit shall explore rainwater harvesting system in non-production building without recharging in to ground water.	Shall be com	plied					

Training shall be imparted to all employees on safety and Standard Operating Procedures are prepared for handling of various chemical and it is health aspects of chemicals handling. Pre-employment and followed in each plant. Awareness and training session are imparted to employees routine periodical medical examinations for all employees regularly. shall be undertaken on regular basis. Training to all Periodical medical examinations are carried out for all employees and records are employees on handling of chemicals shall be imparted. maintained in Form No.32 and pre-employment medical examination records are maintained in Form No.33. Various health awareness and training progammes have been imparted to employees like Awarness programme on Nutrition, Hazardous chemical awareness with personal health and hygiene, Safe handling of Bio-medical waste, First Aid Training etc. Various health bulletins have been published like prevention of heat related illness, Health impact due to Tobacco etc. The company shall also comply with all the environmental Shall be complied. protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA / EMP in respect of environmental management, risk mitigation measures and public hearing relating to the the project shall be implemented. The company shall undertake all relevant measures for Following CSR activities were undertaken by Bayer Vapi for in the pandemic situation to improving the socio-economic conditions of the support the community. surrounding area. CSR activities shall undertaken by 1. Distribution of 900 ration kits to social workers, contract workmen and migrant involving local villages and administration. laborers 2. Distribution of 500 PPE kits in hospitals 3. Donation to CM's relief fund 4. Provided financial support in creating additional bed facility including deputing paramedical staffs in COVID Center (Rofel) through Rotary Trust 5. Converted existing Nitrogen plant available at site into Oxygen generation plant and successfully commissioned to support local Hospital catering to 50 beds The company shall undertake eco-developmental measures Shall be complied. 10 including community welfare measures in the project area for the overall improvement of the environment.

	EC No: J-11011/300/2015-IA.II (I) Compliance Status Report (April 21 - September 21)					
Sr.No.	EC Conditions	Compliance Status				
11	A separate Environmental Management cell equipped wit full fledged laboratory facilities shall be set up to carry ou Environmental Management and Monitoring functions.	h Site has separate environment cell equipped with full fledged laboratory facilities to carry environment management & monitoring functions. Environment Laboratory @ Bayer Vapi				
		Environment tabbilatory & Bayer Vapi				

		AYER VAPI PVT. LTD.	
	EC No: J-11011/300/2015-IA.II (I)	ompliance Status Report (April'21 - September'21)	
Sr.No.	EC Conditions	Compliance Status	
12	cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest	SO I Dec 4., Security Statement data	
13	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zila parisad / Municipal Corporation, Urban local body and the local NGO, if any from whom suggestions/representations, if any were received while processing the proposal.	a de la companya de l	
14	Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective	Last half yearly EC compliance report for the period (April to September)'20 was submitted to Regional office of MoEF & CC, Bhopal, Respective Zonal Office of CPCB, Vadodara and GPCB through our Letter No. ENV/14/21/1805. A copy of Environmental Clearance and six monthly compliance status of EC report is uploaded on company's website.	
15	31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently shall also be put on the website of	A copy of Environmental statement and compliance report is uploaded on company's website. The EC compliance report has been uploaded on the MoEF & CC website dated May 18,	

	EC No: J-11011/300/2015-IA.II (I) Compliance Status Report (April'21 - September'21)					
Sr.No.	EC Conditions	Compliance Status				
16	project has been accorded environmental clearance by the Ministry and copies of clearance letter are available with	The copies of advertisements were submitted to Regional office of MoEF&CC, Bhopal vide letter No.ENV/14/17/0704 dated April 07, 2017.				
17	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project	· San de de				