

ENV/14/19/2410

October 24, 2019

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 2019 to September 2019 Ref: Environmental Clearance no. J-11011/300/2015-IA II (I) dated March 28, 2017 and its amendment dated February 21, 2018.

Respected Sir

Enclosed please find the compliance report of Environmental Clearance for the period April 2019 to September 2019.

We hope you will find the same in order.

Thanking you,

Yours faithfully,

For Bayer Vapi Private Limited

(Formerly Bilag Industries Private Limited)

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

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

Tel +91 260 2407123 Fax: +91 260 2432774 www.vapi.bayer.com www.bayer.in

Narendra K Shah **Director & Site Manager**

Encl: As Stated

CC:

- 1. Mr S H Vegda, Environmental 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.

		YER VAPI P\							
	EC No: J-11011/300/2015-IA.II	(I) Complia	nce Statu	ıs repo	rt (April-19	-Sep-19)			
r.No.	EC Conditions				Con	pliance	Status		
PECIFI 1	National Emission Standards for Pesticide Manufacturing and Formulation Industry issued by the Ministry vide G.S.R. being followed. Emission from incinerator stacks are monitored by 46(E) dated 3rd February, 2006 and amended time to time								red by MOEF &
	shall be followed by the unit.	under:			Incinerator S				
			live in			Para	meters	The state of	
			Month	PM (mg/Nm	HCI (mg/Nm3)	SO2 (mg/Nm3)	HF (mg/Nm3	NOx (mg/Nm3)	Total Dioxins & Furans (ng TEQ/Nm3)
			Limit	50	50	200	4	400	0.1
			Apr-19	30.81	3.76	26.15	1.56	40.18	<0.01
	18		May-19	28.42	2.86	19.98	2.02	31.47	
	- '		Jun-19		N	ot in Opera	tion during	g visit	
			Jul-19		N	ot in Opera	tion durin	g visit	
			Aug-19		N	ot in Opera	tion durin	g visit	
			Sep-19	36.38	3.24	24.59	2.28	42.48	-
			Emission From Boiler stack Parameters Month PM SO2 NOx						
			Mont		PM mg/Nm3)	15	02 (m)	NOx (ppm)	
			Limit		150		00	50	
			Apr-1 May-1		BDL* BDL*		75 23	27.67 31.43	
			Jun-1	.9	BDL*	3.	01	30.22	
			Jul-1: Aug-1		BDL*		50 49	34.58 28.37	
		* BDL= Bel	Sep-1	.9	BDL*	4.	62	33.58	
3	Two stage water scrubber followed by alkali scrubber shall	1.Two stag			10.004.17	to cont	ral aras	ess emiss	
	be provided to process vent to control process emissions	2. Scrubbe	meter is	provide	ed in scrubb	ing syste	em.		
	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 contro	2. Scrubbe plant. 3.Efficience maintainin interlock w 4. Monito accredited	meter is or water y of screed of concer with polluring of	providents treated to the contraction cont	ed in scrubbented in evanished	monitor r solution ment wi stack is ues of la	em. n section ed by on. The of libe pro s carrie st Six m	n followe measurin online det ovided in r d out by onths are	ed by Effluent to ag outlet emiss tection alarm synew projects. MOEF & CC a
	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 controlled parameters of that in case of any increase in pollutants.	2. Scrubbe plant. 3.Efficienc maintainin interlock w 4. Monito accredited	meter is or water y of screed of concer with polluring of	providents treated to the contraction cont	ed in scrubbe ited in eva is being n of scrubbe introl equip s vent and onitored val	monitor r solution ment wi stack is ues of la	em. n section ed by on. The of libe pro s carrie st Six m	n followe measurin online det ovided in r d out by onths are	ed by Effluent to ag outlet emiss tection alarm synew projects. MOEF & CC a
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	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 controlled permissible value of any increase in pollutants beyond permissible limits, plant should be automatically.	2. Scrubbe plant. 3.Efficienc maintainin interlock w 4. Monito accredited	meter is er water y of scrig concervith polluring of Laborate	provide is treatrubber ntration coproces ory. Mo	is being in of scrubbe on roll equip is vent and onitored val	monitor r solution ment wi stack is uses of la m Proces to Sep Paran	em. n section ed by n. The o ll be pro s carrie st Six m ess Ven neters	measurin online det ovided in r d out by onths are	ng outlet emissistection alarm synew projects. MOEF & CC a as under:
	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 controlled permissible value of any increase in pollutants beyond permissible limits, plant should be automatically.	2. Scrubbe plant. 3.Efficienc maintainin interlock w 4. Monito accredited	meter is a reverse water y of sci g concervith polluring of Laborate	provide is treatrubber number ntration coprocessory. Mo	is being is being of scrubbe on trol equip is vent and onitored values (April - 1:	monitor r solution ment wi stack i: ues of la m Proces Paran H (mg/	em. n section ed by on. The office of the control of the contro	measurin online det vided in r d out by onths are	ng outlet emissistection alarm synew projects. MOEF & CC a as under:
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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 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 fugitive emissions for which preventive maintenance of pumps, valves, pipelines are required. Proper maintenance	1. A Leak Detection and Repair (LDAR) studies have been carried out in Four plants through NABL and MoEF&CC accredited Laboratories. Last LDAR study was carried out in two plants by Pollucon Laboratories Pvt Ltd during 3rd December- 05th December 2018 as per CPCB guidelines. A LDAR study for remaining plants are under progress. 2. Around 146 nos. of LEL detectors based on LEL detection principle have been installed in all areas where there is a likelihood of HC leakages from pumps and other equipment. **LDAR Study** **LDAR Study** **LDAR Study** **LDAR STUDY** **LOAR 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 is carried
7	as VOCs shall be installed at all important places/areas.	

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8		 Site has provided adequate stack height to control gaseous emission from DG. The stipulated conditions will be designed and implemented during construction phase. Adequate PPEs like ear plug/ ear muff is provided to employee at the entry point of DG house.
9	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.	2.Magnetic seal less/ double mechanical seal centrifugal pumps are provided for solvents handling. 3.To achieve desired recovery, efficient condensers has been installed after calculating required HTA. 4.Solvents are stored in storage tank as per PESO & site specific process &plant safety guideline. The solvent tanks equipped with breather valve, sprinkler system, nitrogen blanketing etc. 5. Proper earthling has been provided to all equipment and regular inspections are done to maintain continuity. 6.The hazardous area classification has been carried at site and equipment has been selected based on zone.
10	Total water requirement from GIDC water supply shall not exceed 2900 m3/day and prior permission should be obtained from the Competent authority.	

	EC No: J-11011/300/2015-IA.II	(I) Com	nlianco	Statue rom	ort (Anril 10	Sen-101			~
r.No.	EC (vo. 3-11011/300/2013-1A.II	(i) Con	ірпапсе	s Status repo		pliance Sta	tue		
	0.000 ALX 2 CO ROS MICCONXII	w)					SC 400	00D 11 TI	
11		. The wastewater is segregated based on COD,TDS and BOD/COD ratio. The wastewa							
	As proposed, wastewater will be segregated at source and		Sr.No	llosopny is a		oristics	- 11 / 1/ / / / 1	Treatment	
	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							iieau	ileilt
				High COD Hig	h TDS and Vola	tile componer	nt	evaporator an	
	treated wastewater shall be discharged to Common Effluent	1 1	2	Low COD High	n TDS			Evaporator fol	lowed by ET
	Treatment Plant (CETP) for final treatment.		3	High COD Lov	v TDS			Incinerator	
			4	Medium COD	Medium TDS			Fenton	
			5	Low COD Low	TDS and BOD/	COD ratio>0.4	4	ETP	
		analys GPCB/ discha	er provi CPCB se rge of	ded at the or erver for tra treated eff	discharge of t nsferring onl luent which	reated effluine data. The stops the	uent. The a ne auto shu discharge	BOD,TSS,NH3 nalyser are co at off valve pro incase of ex quality are as	nnected w ovided at t cceedance
					Effluent Da	ata (April-19	to Sep-19)		
				Month	Average Discharged to CETP	COD (mg/L)	TSS (mg/L)	NH3-N (mg/L)	
				1111	(KLD)	250	200	50	
				Limit Apr-19	900 484	250 158	300 56	50 11.20	
				May-19	481	136	72	14.60	
				Jun-19	645	124	56	10.20	
				Jul-19	861	115 132	32 28	7.40	
				Aug-19 Sep-19	753 646	128	34	6.40 8.30	
12	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	by Val Manag Site ha pond i	oi Gree gement as separ	n Enviro Pr Company Li ate collectio	ivate Limited mited) on system for	d (Formerly	known as		and Efflu
				SA					
13	Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be by pumps.	2.Aded	quate ni	umber of fla		provided.	r solvent tr	ransfer	

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15	storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans-	2.Follwing measures are taken by site for fire fighting in case of emergency: - Trained fire fighter available at site 24 X 7. - Fire Hydrant system. - Sprinkler System
16	0, 0	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 to 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	 On Site Emergency Action Plan in place to handle any emergency. The safety audit carried out by competent person every year. The last safety audit was conducted in the month of August, 2019.
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 nos fire tenders 8. Fire Hydrant system 9. Trained fire fighters available at site 24 X 7 hrs. 10. Fixed fire protection system.

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19		The site has full fledged Occupational Health Center with full time Factory Medi Officer (FMO). Occupational health related surveillance is carried out regular Periodical medical examinations are carried out for all employees and records a maintained in Form No.32 and pre-employee medical examination records a maintained in Form No.33.
		Annual Medical Checkup-Company Employee Annual Medical Checkup-Contract Employee
20	and around the plant premises to mitigate the effects of fugitive emissions all around the plant as per the CPCB	The company has developed green area inside the plant premises. The company developed green area in 5.2 hectares land. The company has also developed green a adjacent to boundary wall. The green belt development work in progress in ne purchased land having area 5.4 ha. We have selected some plant species as per Cf guideline and communicated to DFO vide our letter No. ENV/06/18/2702 da February 27,2018 for further advice. Every year plantation is carried out to increase greenbelt area inside and outside of our presmises.
21		
22	All the recommendations made in the risk assessment report should be satisfactorily implemented.	Shall be complied

BAYER VAPI PVT. LTD. EC No: J-11011/300/2015-IA.II (I) Compliance Status report (April-19 -Sep-19) Sr.No. **EC Conditions** The unit shall ensure Zero Liquid Discharge (ZLD) for the Last five months recycle treated effluents are as under: 23 expanded capacity by recycling the treated effleunt. Recycle treated effluent Quantity Quantity **Average Quantity** Recycled Month Recycled (KL/Day) (KL) Apr-19 4258 142 4204 May-19 136 Jun-19 4244 141 5841 188 Jul-19 Aug-19 4122 133 Sep-19 3872 129 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 connectivity provided for measured the treatment unit. Data to be uploaded on company's parameters with GPCB & CPCB server. website and provided to respective RO of MOEF&CC, CPCB and SPCB. ETP FINAL PIT Online Continuous Effluent Monitoring Station **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 authority. 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 shall be decided in consultation with the SPCB and it shall locations are marked in Site Layout. The ambient air quality monitoring stations are be ensured that at least one station is installed in the based on prominent wind direction. I.e. one is in upwind direction and remaining fours upwind and downwind direction as well as where maximum are in downwind direction. The same was informed to GPCB through letter No. ENV/06/17/1307 dated July 13,2017. ground level concentration are anticipated.

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4	The national Ambient Air Quality Emission standards issued by Ministry vide G.S.R NO. 826 (E) dated 16th on every month from MOEF&CC and NABL accredited laboratory. Monitore November, 2009 shall be followed.										
		l.e	Ambient	Air Quality			19 to Sep-19	9)			
					Pa	rameters Sulph	e I				
			Month	PM10	PM2.5		de Nitrog	- A (SAC)			
		4.5	Unit	μg/m3	μg/m3						
			LIMIT	100	80	80					
			Apr-19	80.19 77.29	38.75						
	-		May-19 Jun-19	68.82	34.95						
		_	Jul-19	62.38	31.05						
			Aug-19	71.26	39.12			33			
			Sep-19	71.37	38.59	14.4	5 30.4	19			
	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	Locati Limi	on	(dBA) 75 dB(A)	Night Time (dBA) 70 dB(A)				
			1	Near Main		58.42	54.98				
			2	Near admir Building	,	58.67	55.18				
			3	Near EFSO	Plant	64.70	61.42				
			4	Near ALCO	Plant	64.08	60.02				
			5	Near Incine	rator-2	70.95	67.22				
			6	Near Incine	rator-3	67.53	63.93				
			7	Near Scrap	Yard	66.57	62.23				
			8	Near HICO-	1	67.98	65.18				
			9	Near CYFO	Plant	64.60	60.10				
			10	Near Gate-	11	59.85	55.95				
			11	Near Engine Part Store	eering	59.70	55.68				
			12	Near ETP		65.03	60.77				
6	The unit shall explore rainwater harvesting system in non- production building without recharging in to ground water.	Shall be com	plied								

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7	health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees	Periodical medical examinations are carried out for all employees and records are maintained in Form No.32 and pre-employee medical examination records are maintained in Form No.33.
		Various health awareness and training progamme have been imparted for 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.
		First aid Recertification Training
8	The company shall also comply with all the environmental protection measures and safeguards proposed in the project report 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.	
9	improving the socio-economic conditions of the	Following CSR activities undertake by Bayer Vapi for improving the Socio-Economic conditions of the surrounding area. 1. Bayer Vapi has been organised "Free Surgical Camp" at Kasturba Hospital, Valsad from 19st Jan - 25th Jan 2019. The main obective of this camp was providing quality healthcare to needy patient. A team of 35 Scientific Experts and Doctors from USA offered expertise services in camp. During a surgical camp at Kasturba Hospital, Operation Medical performed 253 free surgeries and 87 dental procedures. The children play area has been developed for community.

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10	The company shall undertake eco-development measures Shincluding community welfare measures in the project area for the overall improvement of the environment.	nall be complied.				
11	full fledged laboratory facilities shall be set up to carry out ca Environmental Management and Monitoring functions.					
12	The company shall earmark sufficient funds recurring cost Th per annum to implement the conditions stipulated by the co Ministry of Environment and Forests as well as the state Al:	he Site has provided adequate fund both capital and recurring to implement the onditions stipulated by MOEF & CC and GPCB along with implementation schedule. Iso it is ensured that the fund so provided shall not diverted for any other purpose. he total recurring budget for the year 2018-19 for Environment is 61.8 cr.				
13	A copy of the clearance letter shall be sent by the project EC 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.	C letters have been sent to all stake holders. EC letter also uploaded on company vebsite.				
14	clearance conditions including results of monitored data (to both in hard copies as well as by e-mail) to the respective GF	ast half yearly EC compliance report for the period October -18 to March- 19 submitted of Regional office of MOEF & CC, Bhopal, Respective zonal office of CPCB, Vadodara and EPCB through our letter No.ENV/14/19/1311. I copy of Environmental Clearance and six monthly compliance status of EC report is				
15	31st March in form-V as is mandated shall be submitted to on 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	copy of Environmental statement and compliance report is uploaded on company's rebsite. The hard copy of EC compliance report submitted to the Bhopal Regional Offices of				

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16	project has been accorded environmental clearance by the Ministry and copies of clearance letter are available with	The copies of advertisement submitted Regional office of MOEF&CC, Bhopal vide lette 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						