

ENV/14/16/2111

November 21, 2016

Additional Director

Ministry of Environment, Forests & Climate Change Kendriya Paryavaran Bhavan Link Road No.3 E-5, Ravi Shankar Nagar Bhopal-462016

Sub: Compliance report for April 2016 to September 2016

Ref: Environmental Clearance no. J-11011/526/2008-IA II (I) dated

September 22, 2008

Respected Sir

Enclosed please find the compliance report of Environmental Clearance for the period April 2016 to September 2016. 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

Umper Narendra K Shah

Director & Site Manager

Encl: As Stated

Mrs D P Shah, Environmental Engineer, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector-10 A Gandhinagar



	EC No. J-11011/520	BAYER VAPI PVT 6/2008-IA II (I) Cc		atus report			
.No.		Compliance Status					
FCIE	 FIC CONDITIONS						_
1	The existing effluent treatment plant shall be expanded to meet the additional load. The process effluent after primary, secondary and tertiary treatment shall conform to be industry specific discharge standard notified under the	2010. The efflue treatment. The ar	nt treatment nalysis results	plant consist of samples	of primary,	secondary ar	nd t
	Environment (Protection) Act, 1986. The treated	Date	рН	COD	SS		
	effluent shall be conveyed to GIDC drainage			mg/L	mg/		g/L
	system leading to CETP of M/S Vapi Waste and	12/04/2016	6.5-8.5	1000	300		50 L3
	Effluent Management CO Ltd.	18/04/2016	8.01 7.65	112 136	52 20		L3 L1
		02/05/2016	8.08	88	12		8
		20/05/2016	7.87	64	28		5
		27/05/2016	7.78	144	32		5
		04/06//2016	7.35	72	28	1	L1
		12/06/2016	8.56	208	16	N	ID
		17/06/2016	7.98	180	36		ID
		26/06/2016	7.74	144	200		4
		08/07/2016 06/08/2016	7.64	152	24		2.8
		31/08/2016	8.52 8.28	184 184	32 16		5 14
		18/09/2016	7.59	104	28		ID
		29/09/2016	8.1	144	48		5
		All monitored valudischarged to conditionage system and Effluent Man	ommon effluon	ent treatmen Vapi Green E	t plant thoug Enviro Limited	gh GIDC un d (Formerly V	ed e derç
2	The gaseous emissions (So2, NOx, SPM and RSPM) from various process units shall	discharged to condrainage system and Effluent Mana. The ambient air premises every	ommon efflui operated by agement Con quality moni month by Mi	ent treatmen Vapi Green E npany Limited toring are ca OEF&CC an	t plant though Enviro Limited I). The condition Inried out at d NABL acci	gh GIDC und (Formerly Vition is completed) 05 locations redited labora	ed e
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2	The gaseous emissions (So2, NOx, SPM and RSPM) from various process units shall conform to the standard prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the	discharged to condrainage system and Effluent Man. The ambient air premises every average results o	ommon efflu operated by agement Con quality moni month by Mi f last six mon	ent treatmen Vapi Green E npany Limited toring are ca OEF&CC an th (Apr-Sep 2	t plant thought plant thought. The condition of the cond	gh GIDC und (Formerly Vition is completed to the complete	ed e derg api lied
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	EC No. J-11011/520	26/2008-IA II (I) Compliance Status report								
Sr.No.	EC Conditions					Com	npliance S	tatus		
4	For control of process emissions in the form of HCI, NH3 and CI2, scrubbers shall be installed. The incinerator unit-I shall be replaced by capacity incinerator (7.00 Mcal/hr.). To quench the emissions from the incinerator, scrubber shall be provided and emissions shall conform to the prescribed standard for the incinerator under the environment (Protection) Act, 1986. Regular	emi yea incl inci sta	issions. The 2013 with uding unitensity with the contractor with t	ne Inc h was II at s th on	inerate was ite is iline	tor unit 1 is aste heat r 8.68 Mkca pH meter	s replaced recovery b a/hr .Two s and online Six month	with 6.5 oiler. Th stage scr e analyz ns result	MKcal/hr In e total incine rubbers are a ers provide	cinerator in eration capa also provide d in inciner
	monitoring of dioxin and furans shall be carried out in the emissions from the incinerator.		Month	nth SO:		Nox μg/m3	HCl	PM mg/Nm3	Cl2 mg/Nm3	Dioxins &
			LIMIT	20	20	400	50	100	5	ngTEQ/Nm 0.1
				20	JU		The second second		uring visit	0.1
	, ,		Apr	15	ГС	42.22	3.46	34.24		
			May	15.	.56				uring visit	
			Jun Jul	10	52		2.84	28.94		-
	1.4			_	.53 .59	35.66 32.14	3.12	30.24		_
			Aug		.37	26.5	5.85	21.3	3.69	
			Sep	10.	.57				3.03	
			-			PR	OCESS			
								ramet		LUD
			Mon	th		502	HCI		CI2	HBr
					m	g/m3	mg/m	13 m	ng/Nm3	mg/Nm
			LIMI		1	40	20 5.41		3.07	1.28
			Apı			16.99	3.18		2.86	1.46
			May			16.91 26.43	6.86		3.77	1.28
			Jun Jul		_	L5.15	6.4		5.77	
			Aug				6.12		2.84	1.00
			Ser			20.17	8.83		3.17	1.89
		All		he condition	n is compl					
5	environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by GPCB.	 The 2. Mechanical seal/seal less pumps for solvent d by 3. 20 mbar nitrogen blanketing system 4. Vent of entire plant storage vessels, reactors, condensors and equipments are connected to a common header. Also work area monitoring is carried out regularly. No limit imposed by fugitive emission. The condition is complied. f as a The unit is a member of Common Treatment, Storage and Disposa and operated by Vapi Green Enviro Limited and Saurashtra Enviro Project Limited. The required statutory documents as per Hazardou med Management and Handling Rules are maintained by unit. The control of th						ed by GPCI		
6	per the Hazardous waste (management and Handling) rules, 2003. Authorization from the							l Sauras ients a	shtra Enviro s per Haz	Projects Pri zardous W

		BAYER VAPI PVT LTD. 6/2008-IA II (I) Compliance Status report								
Sr.No.	EC Conditions				Compliance St	atus				
7	pressure to avoid any leakages. Breathers, N2 blanketing and condensers will be provided for all the storage tanks. Closed handling systems for chemicals and solvents will be provided. Magnetic seals will be provided for pumps/agitators for reactors for reduction of	or 2. All hazardous chemicals/ raw materials are being handled in closed system s. 3. Magnetic seal less/ double mechanical seal centrifugal pumps are provided. For solvents to control fugitive emission. 4. Secondary condensors are used in case of volatile solvents where child water or chilled brine is used as coolant. 5. Solvent traps are provided in plants. The condition is complied.					tem. rovided			
8	All venting equipment shall have vapor recovery system. All the pumps and other equipment's where there is a likelihood of HC leakages shall be provided with leak detection and repair(LDAR) system and LEL indicators and Hydrocarbon detectors. Provision for immediate isolation of such equipments, in case of a leakage will also be made. The company shall provide a well defined leak detection and Repair	HC 2. sto 3. / 4. giv 5. I	04 nos of cl rage area of All solvent ha Monitoring o en in below t Regular mair	hlorine detecto chlorine and b andling pumps f HC using po table. ntenance of val	rs and 05 Nos romine. provided with m rtable analyzer ves, pumps and	bromine detect echanical seals which is measu d other equipme	ors are instance.	alled in level is out.		
	(LDAR) programmed for quantification and		Sr.No.	Month April	Date 09/04/2016	Plant ALCO/DIBO	Nil			
	control of fugitive emissions. The detectors		1	April	29/04/2016 07/05/2016	HICO-II	Nil Nil	-		
	sensitivity will be in ppm levels.		2	May	08/05/2016	MBPD-II	Nil			
			3	June	12/06/2016	MPBD-I	Nil	-		
					12/06/2016	ARCO EFSO	Nil Nil	-		
			4	July	30/07/2016	CYFO	Nil			
				August	19/08/2016	TECO	Nil			
			5	August	19/08/2016	DICO	Nil			
			6	September	29/09/2016 29/09/2016	MICO-LICO-I	Nil Nil	-		
9	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.	e All	hazardous orm water d	rain and efflue	ent line. The u	nit has well det	fined leak a	and sp		
10	The company shall make adequate arrangement for control of Odour nuisance from the plan premises.	t 1. bla 2. eq	Majority of anketing systems of equipments are are some controllers are some controllers.	operations ar tem. entire plant s re connected	re in close sys torage vessels, to common hea	dour at site. Item and under reactors, con ader maintaining atment system is	densors an g 20 mbar	d oth		

		BAYER VAPI PVT LTD. 6/2008-IA II (I) Compliance Status report
Sr.No.	EC Conditions	Compliance Status
11	in the budget of the project for implementation of the above suggested environmental safeguards.	Cost incurred between the year 2010-2015 was 168 Crores for upgrading Environmental Management System including cost mentioned in EMP.The budget for operation of Environmental Management System for the year 2016 is 63.84 crores. Adequate provision are always available in budget for Environmental Management system which is not diverted for any other purpose. The condition is complied.
12	shall be done on a regular basis and record maintained as per the Factories Act.	The site has full flegged Occupational Health Center with full time Factory Medical Officer (FMO). Occupational health related surveillance is carried out regularly. 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. The condition is complied.
13	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.	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 equipments are provided in the flammable area. 7. Full Flegged 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.

BAYER VAPI PVT LTD. EC No. J-11011/526/2008-IA II (I) Compliance Status report **Compliance Status** Sr.No. **EC Conditions** Training shall be imparted to all employees on Various type of internal and external training is provided to employees on safety safety and health aspects of chemical handling and Health aspect. i.e. fork lift safety, electrical safety, permit systems, BBS As informed to ministry , OHSAS 18001 shall be OHSAS 18001 etc. Periodical medical examinations are carried out for all routine employee and records are maintained in Form No.32 and pre-employee Pre-employment and for all medicals examination records are maintained in Form No.33. The summary of medical examinations periodical employees shall be undertaken on regular basis. trainings provided to employees for the period April 2016- September 2016 are Training to all employees on handling of as under: chemical shall be imparted. No of Sessions Total Training Company Contract programs Internal 241 1136 6457 7593 495 252 243 External 08 The condition is complied. Usages of PPEs by all employees/workers shall Various PPEs are provided to employees such as safety shoes, Helmet, ear plug, vapour mask etc. The safety induction training provided to all newly joined be ensured. company and contract employees, The induction module include use of various PPEs. Various training session has been organized from internal and external faculty for use and maintain of various PPEs. The sample copy of PPE matrix is as under: PPE MATRIX PLANT: TECO The condition is complied. The company shall strictly follow all the The pointwise compliance of CREP are as under: recommendations mentioned in the charter on Corporate Responsibility for environmental CREP Point Segregation The wastewater has been segregated and protection.(CREP) treated based on characteristics of wastewater. waste streams: The wastewater pretreatment plant comprising of Evaporators for treatment of high COD and high TDS streams, Fenton oxidation plant to treat streams having low biodegradability, stripper to separate low boiling liquid organic components in the wastewater. The untreated cyanide containing streams is being treated with the help of hydrogen peroxide Detoxification and treatment of followed by Evaporator. high COD waste streams: Various measures taken to improve solvent Improvement in solvent recovery Optimization of process parameters Change in utility services Recycle/reduction of Aqueous layer Increase in settling time Elimination of solvent wash Common venting system with spiral Exchangers. • Ejector replacement with vacuum pumps 20 mbar nitrogen blanketing system in place Mechanical seal/seal less pumps are used for The condition is complied.

2		AYER VAPI PVT LTD.
		i/2008-IA II (I) Compliance Status report
17	minimization/cleaner production techniques to reduce the pollution load and action plan in this regard submitted to the Ministry.	Compliance Status 1. The steam generated from waste heat recovery boiler of incinerator is used in manufacturing plants. 2. Steam condensate is used as boiler feed water. 3. The process condensate is used in cooling tower make up. 4. Reduction in water washes in production plant. 5. The solvent recovery is 95 %. The condition is complied.
18	The company shall undertake rainwater harvesting measures to recharge the ground water as well as reduced consumption of water.	The unit realizes the importance of rainwater harvesting however rain water harvesting is not taken up in plant area. This is because if some hazardous dust (in spite of all possible precautions) gets mixed with rainwater and enter the ground water the ground water will get contaminated. The site does not withdraw ground water. The water table in vapi region is quite high due to average rainfall 2500 mm/year. In view of the above factors, the site has not carried out rain water harvesting. If still deemed necessary, the site will make provision at alternate place. The condition is complied.
GENER	RAL CONDITIONS	
19	stipulations of the SPCB/state government or any statutory body.	 Submission of monthly patrak on GPCB web site. Monthly monitoring of various parameters of air, water and hazardous waste. Upgraded Environmental Management System to achieve COD < 250 mg/L and BOD<30 mg/L Installed online monitoring analyzers for specified parameters. The condition is complied.
20	plant shall be carried out without prior approval	
21	The project authorities shall comply with rules and regulations under manufacture, Storage and import of hazardous Chemicals Rules,1989 as amended. Authorization from SPCB shall be obtained for collection, treatment, storage and disposal of Hazardous waste.	 Preparation of On Site Emergency Action Plan: On Site Emergency Action Plan in place to handle any emergency. Safety Audit: The safety audit carried out by competent person every year. Mock Drill: The mock drill is carried out regularly. The unit is obtained authorization from SPCB valid up to February 01, 2017. The condition is complied.
22	set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the State Pollution control Board.	05 nos ambient air quality monitoring locations are set up within plant premises based on previous Environmental Impact Assessment Report. The ambient air quality monitoring are carried out at 05 locations within the premises every month from MOEF&CC and NABL accredited laboratory. The condition is complied.
23	appropriate height as per the Central Pollution Control Board guidelines shall be provided. The	The adequate stack height are provided for all scrubbers, incinerators and boilers as per CPCB guideline. The stack height of boilers and incinerators are 30 m and 40 M respectively. The scrubber water is sent to wastewater pre-Treatment plant for further treatment. The condition is complied.

		BAYER VAPI PVT LTD. 5/2008-IA II (I) Compliance Status report						
Sr No		Compliance Status						
Sr.No. 24	EC Conditions The company shall undertake following waste Minimization Measures: - Metering of quantities of active ingredients to minimize waste. -Reuse of by-products from the process as raw materials or raw material substitutes in other processes. -Maximizing recoveries. -Use of automated material transfer system to	1. All soli liquid raw into the re 2. The by raw mate April 2010 Bisulphite 3. The ave 4. All sol system ar 5. Majority	id raw m material eactor. products rials in o 6-Septem e used in o erage solv lid finishend ind liquid f	Compliance saterials are weighted and a sare transferred through generated mainly dilute hather products. 998.004 Maker 2016) for CMAC mamanufacturing of Betacyflivents recovery are more the goods are packed in inished goods are packed.	d then transfer mass flow medical me	eter or leve m Bisulphit n last six mo nd 70.00 M h automate	I indicator e used as onth (from T Sodium d packing	
25	the rules and regulations with regards to handling and disposal of hazardous waste in accordance with the Hazardous Waste (Management and Handling) Rules, 2003. Authorization from the SPCB shall be obtained for collections/treatment/storage/disposal of hazardous waste.	with The unit is member of Common Treatment, Storage and Disposate to operated by Vapi Green Enviro Limited and Saurashtra Enviro Project Limited. The unit is maintained required statutory documents as per Naste Management and Handling Rules. The condition is complied.					cts Private Hazardous	
26	The overall noise levels in and around the plant area shall be kept well within the standards (85 dB) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of the noise generation. The ambient noise level shall conform to the standard prescribed under Environment (Protection) Act 1986 Rules, 1989 viz. 75 dB	approved permissib	by Sta	e Pollution Control Boa	ard (SPCB).	Night time dBA 70 66	are within	
	(day time) and 70 dB (night time).		2 3 4 5	Nr Canteen area Nr Boiler House Nr ETP area Nr ETP building	69 74 72 71	67 69 68 69		
			6 7 8 9	Nr Process area Nr Admin Building Nr DG area Nr Incinerator area	73 68 72 73	69 66 70 69		
27	A separate environmental management cell			Nr Chemcial storage area complied. full-fledged Health, Safet	70 ty and Environ	67 ment Depar	tment. The	
	equipped with full fledged laboratory facilities shall be up to carry out the environmental management and monitoring functions.	The company has full-fledged Health, Safety and Environment Department. The full fledged Environmental laboratory along with central laboratory is available a site to monitor day to day activities. The condition is complied.						
28	The project authorities shall develop greenbelt in 33% of project area as per the guideline of CPCB to mitigate the effect of fugitive emission. Site has installed vent gas collection, transporation and treatment system fugitive emission as mentioned in point no.5 above. Every year plantation carried out to increase the green area inside the plant premises. The compan has developed green area in 5.2 hectare though limited area of land is aviilab Company has purchased additional land around 5.4 hectare for green be development. We will continue plantation programmed to increase green be The condition is partially complied.					lantation is e company is avilable. green belt		

		BAYER VAPI PVT LTD.				
		6/2008-IA II (I) Compliance Status report				
Sr.No.		Compliance Status				
		The last six month compliance report submitted to your office vide our letter no.				
29	environmental action plans shall be monitored by Ministry's Regional office/SPCB/CPCB. A six monthly compliance status report shall be submitted to monitoring agencies.	ENV/14/15/3011 and ENV/14/16/2805 dated November 30, 2015 and May 28, 2016 respectively. The condition is complied.				
30	The project proponent shall inform the public	The notice published in local news paper in SANDESH and TIMES OF INDIA dated October 10, 2008. The condition is complied.				
,	copies of the clearance letter are available with the SPCB and may also be seen at website of the Ministry at http://envfor.nic.in. 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 Ministry's Regional Office.					
31	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 concerned authorities and the date of start of the project.					