

ENV/14/18/0705

May 07, 2018

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 October 2017 to March 2018

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 October 2017 to March 2018.

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

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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.

BAYER VAPPPVT. LTD. EC No: J-11011/300/2015-IA.II (I) Compliance Status report (October,17 - March, 18) Sr.No. **EC Conditions** Compliance Status A. SPECIFIC CONDITIONS National Emission Standards for Pesticide Manufacturing The emission standard for pesticides industry unit amended on June 13, 2011 and is and Formulation Industry issued by the Ministry vide G.S.R. being followed. Emission from incinerator stacks are monitored by MOEF & CC and 46(E) dated 3rd February, 2006 and amended time to time NABL accredited Laboratory on monthly basis. The monitored values of emission are as shall be followed by the unit. under: Incinerator Stack (October-17 to March-18) Parameters otal Dioxin Month & Furans (ng TEQ/Nm3) mg/Nm3 ng/Nm3 mg/Nm3 ng/Nm3 Limit 50 50 200 5 0.1 Oct-17 23.42 3.84 33.17 3.74 56.19 Nov-17 22.44 15.47 3.41 44.83 0.022 Dec-17 25.40 454 19.61 4.42 48.54 18.44 Jan-18 2.44 17.62 2.37 38.86 Feb-18 34.68 3.40 3.31 Mar-18 27.85 4.38 18.34 4.26 35.22 0.015 Adequate stack height shall be provided to gas fired boiler Site has provided adequate stack height for wide dispersion of stack emission. We are to control particulate emissions. using Natural gas as a clean fuel in boiler. Emission from gas fired boilers are monitored by MOEF & CC and NABL accredited Laboratory on monthly basis. The monitored values of emission as under: **Emission From Boiler stack** Parameters Month PM 502 NOx (mg/Nm3) (ppm) (ppm) Limit 150 100 50 Oct-17 Not in operation during visit Nov-17 BDL 2.92 31.30 Dec-17 BDL 2.67 27.63 Jan-18 BDL 3.37 28.52 Feb-18 BDL 2.40 27.52 Mar-18 BDL 3.03 28.45 Two stage water scrubber followed by alkali scrubber shall 1.Two stage scrubbers are provided to control process emissions from process vents be provided to process vent to control process emissions Online pH meter is provided in scrubbing system. viz. HCl, SO2, Cl2, NOx, HBr. The scrubbed water should be 2. Scrubber water is treated in evaporation section followed by Effluent treatment sent to ETP for further treatment. plant. Efficiency of scrubber shall be monitored regularly and 3.Efficiency of scrubber is being monitored by measuring outlet emission and maintained properly. Scrubbers vent shall be provided with maintaining concentration of scrubber solution. The online detection alarm system and online detection and alarm system to indicate higher than interlock with pollution control equipment will be provided in new projects. permissible value of controlled parameters. At no time, the 4. Monitoring of process vent and stack is carried out by MOEF & CC and NABL emission levels shall go beyond the prescribed standards. accredited Laboratory. Monitored values of last Six months are as under: The system should be interlocked with the pollution control equipment so that in case of any increase in pollutants (October-17 to March-18) beyond permissible limits, plant should be automatically Parameters 502 HCI (mg/Nm3) (mg/Nm3) (mg/Nm3) Limit 40 20 5 Oct-17 22.10 7.21 3.48 Nov-17 27.13 6.13 2.62 Dec-17 23.58 6.63

Feb-18

Mar-18

27.60

8.51

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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. S.Work environment monitoring of opening areas is done regularly.		
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 of mechanical seals of pumps and valves shall be given. A	1. A Leak Detection and Repair (LDAR) studies have been carried out in two plants through NABL and MoEF&CC accredited CVR Labs pvt.Ltd. during 29th Decemeber-30th December 2017 as per CPCB guidelines. Based on calculation its conclude that VOC emission before repair was 23.236 kg/year which is reduce up to 4.668 kg/year after repairing leakages. A LDAR study for remaining plants are under progress. 2. Around 62 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.		
		Section of the sectio		
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 out. 2.Testing of all vessels/rectors are carried out by competent person at defined frequency. 3. Equipment design will be done accordingly.		
7	as VOCs shall be installed at all important places/areas.			

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8	The gaseous emissions from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.	ter control gaseous emission from DG. 2. The stipulated conditions will be designed and implemented during constitute to the DG sets to phase. 3. Adequate PPEs like ear plug/ ear muff is provided to employee at the entry DG house.		
9	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.	2.Magnetic seal less/ double mechanical seal centrifugal pumps are provided fo 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, nitrogety blanketing etc. 5. Proper earthing 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.			

BAYER VAPI PVT. LTD. EC No: J-11011/300/2015-IA.II (I) Compliance Status report (October,17 - March, 18) Sr.No. **EC Conditions Compliance Status** Industrial effluent generation shall not exceed 900 m3/day. The wastewater is segregated based on COD, TDS and BOD/COD ratio. The wastewater As proposed, wastewater will be segregated at source and generation philosophy is as under: treated based on its characteristics viz High COD & High TDS Sr.No Characteristics Treatment and Low COD & Low TDS. High COD & High TDS effluents High COD High TDS and Volatile component Stripper followed will be sent to MEE followed by RO while Low COD & Low evaporator and ETP TDS effluents will be treated in ETP followed by RO. The 2 Low COD High TDS Evaporator followed by ETP treated wastewater shall be discharged to Common Effluent Treatment Plant (CETP) for final treatment. 3 High COD Low TDS Incinerator

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Final effluent discharge is being monitored daily for pH,COD,BOD,TSS,NH3-N.The online analyser provided at the discharge of treated effluent. The analyser are connected with GPCB/CPCB server for transferring online data. The auto shut off valve provided at the discharge of treated effluent which stops the discharge incase of excedence of parameters. Last six month effluent generation quantity and quality are as under:

Fenton

ETP

Medium COD Medium TDS

Low COD Low TDS and BOD/COD ratio>0.4

Month	Average Discharged to CETP	COD (mg/L)	TSS (mg/L)	NH3-N (mg/L)
Limit		250	100	50
Oct-17	543	88	24	9
Nov-17	560	70	16	13
Dec-17	622	92	18	19
Jan-18	646	88	32	14
Feb-18	623	72	56	19
Mar-18	468	80	75	24

All results are within the prescribed limit. The treated effluent 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)



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12	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	Site has separate collection system for effluent and storm water. The capacity of guapond is 3000 KL.				
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					
	tank farm. Solvent transfer shall be by pumps.	Double mechanical seal/seal less pumps used for solvent transfer				
14	The by-products which fall under the purview of the hazardous waste Rules, be handled as per the provisions of the said Rules and necessary permissions shall be obtained under the said Rules.	The site has authorisation for collection, storage and disposal of by-products falli under the the Hazardous Waste (Management, Handling and Trans- Bounda Movement) Rules, 2016 valid up to September 30,2021.				
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	ETP sludge, inorganic waste shall be sent to TSDF site. High calorific value waste such as spent organic shall be sent to cement factory/incinerated.	1.ETP sludge, inorganic waste is sent to the authorised TSDF sites operated Saurasthra Enviro Projects Pvt Ltd. (SEPPL); Vapi Green Enviro Limited (formerly Knoras Vapi waste & Effluent Mgt. Co. Ltd). 2. High calorific value waste is incinerated In in-house incineration facility as well sent to common Hazardous Waste Incineration Facilities (CHWIF) operated Saurasthra Enviro Projects Pvt Ltd. (SEPPL).				

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17	guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended in	4. The transportation of hazardous chemicals as per Motor Vehicle Act shall be		
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.		
19	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 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		
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 has developed green area in 5.2 hectares land. The company has also developed green area adjacent to boundary wall. The green belt development work in progress in newly purchased land having area 5.4 ha. We have selected some plant species as per CPCB guideline and communicated to DFO vide our letter No. ENV/06/18/2702 dated February 27,2018 for further advice. Every year plantation is carried out to increase the greenbelt area.		

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21	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				
22	All the recommendations made in the risk assessment Shall be complied report should be satisfactorily implemented.				
23	The unit shall ensure Zero Liquid Discharge (ZLD) for the expanded capacity by recycling the treated effleunt.	Last five months recycle	treated effluent	ts are as under:	
		R	ecycle treated e	effluent Quantity	
ŧ		Month	Quantity Recycled (KL)	Average Quantity Recycled (KL/Day)	
		Nov-17	5061	169	
		Dec-17	4415	142	
		Jan-18	6682	216	
		Feb-18	4546	162	
		Mar-18	4524	146	
24	Continuous online (24 x 7) monitoring to be installed for flow measurement and measurement of pollutants within the treatment unit. Data to be uploaded on company's website and provided to respective RO of MOEF&CC, CPCB and SPCB.	Online monitoring station (24 x 7) is installed for monitoring flow, pH,TOC and TSS for treated effluent discharged to CETP.The online connectivity provided for measure parameters with GPCB & CPCB server.			
GENER	AL CONDITIONS				
1	The project authorities shall strictly adhere to the stipulations made by the state Pollution Control Board(SPCB), State Government and any other statutory authority.	The company follows all	stipulations ma	de by State Pollution Control Boa	ard (SPCB).
2	No further expansion or modifications in the plant shall be 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 any.	nall be followed.			

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3	The locations of ambient air quality monitoring stations shall be decided in consultation with the SPCB and it shall be ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentration are anticipated.	locations based on are in do	are marked prominent ownwind di	d in Site Lav wind directi	yout. Th ion. I.e. ie same	ne ambien one is in u	air quality my pwind direction	nonitoring stations on and remaining fo
4	The national Ambient Air Quality Emission standards issued by Ministry vide G.S.R NO. 826 (E) dated 16th November, 2009 shall be followed.	on every r		MOEF&CC				
			Ambier	nt Air Quality	Monito	ring /Oct 1	7 to Mar 19\	1
			Allibiei	It All Quality		arameters	7 to mai-10)	-
			Month	PM10	PM2.	Sulph	de Oxides of	F
			Unit	μg/m3	μg/m	3 μg/n	3 μg/m3	-
			LIMIT	100	80	80	80	1
		J. J.	Oct-17	69.59	38.5			1
			Nov-17	80.51	40.80	0 17.0	9 36.00	
			Dec-17	66.71	33,29			
			Jan-18	78.29	38.32	2 17.5	5 36.59	
					-			_
5	The Overall noise levels in and around the plant area shall		Feb-18 Mar-18 monitoring	76.69 71.69 g are carried	39.2 36.19 d out at	1 16.7 5 16.4 t 12 location	9 33.65 3 32.66 ons on monthl	
5	be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise	and NABL	Feb-18 Mar-18 monitoring accredited last six mon	76.69 71.69 g are carried Laboratory	39.2° 36.19 d out at d. All res ander:	1 16.7 5 16.4 t 12 location sults are w	9 33.65 3 32.66 ons on monthlithin permissil	
5	be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under	and NABL	Feb-18 Mar-18 monitoring accredited last six mon	76.69 71.69 g are carried Laboratory oths are as u	39.2° 36.19 d out at All res inder:	1 16.7 5 16.4 t 12 location sults are with the control of the cont	9 33.65 3 32.66 ons on monthlithin permissil	
5	be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise	and NABL	Feb-18 Mar-18 monitoring accredited last six mon	76.69 71.69 g are carried Laboratory ths are as u Monitorin Locatio	39.2° 36.15 d out at v. All resinder: g (Octob	1 16.7 5 16.4 t 12 location sults are we ber-17 to M Day Time (dBA)	9 33.65 3 32.66 ons on monthlithin permissil	
5	be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act,1986 Rules,1989 viz. 75 dBA(and NABL	Feb-18 Mar-18 monitoring accredited last six mon	76.69 71.69 g are carried Laboratory of the are as u	39.2' 36.15 d out at d. All resinder: g (Octob	1 16.7 5 16.4 t 12 location sults are with the control of the cont	9 33.65 3 32.66 ons on monthlithin permissil	
5	be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act,1986 Rules,1989 viz. 75 dBA(and NABL	Feb-18 Mar-18 monitoring accredited last six mon Noise Sr.No	76.69 71.69 g are carried Laboratory this are as u e Monitorin Locatio Limit Near Main o	39.2' 36.19 d out at All resemble: g (Octobor) t Gate	1 16.7 5 16.4 t 12 location sults are with the control of the cont	9 33.65 3 32.66 ons on monthlithin permissil larch-18) Night Time (dBA) 70 dBA	
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6	The unit shall explore rainwater harvesting system in non- production building without recharging in to ground water.	Shall be complied			
7	health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees	Standard operating Procedures are prepared for handling of various chemical and it available in each plant of company premises. Training session is carried out regularly fremployees. Periodical medical examinations are carried out for all employees and records at maintained in Form No.32 and pre-employee medical examination records at maintained in Form No.33.			
		We have prepared and displayed poster & video to create awarness among the employees on disease like Diabetes & Hypertension, we have imparted awarnessessions for employees on various Health Promotional activities like Prevention of Hestress, Best Ergonomics Practices, etc.			
		If severe the above in the control of the control o			
		Sign of the gas of the section of the first in the section of			
		The second secon			
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	1.We have extended our supports to The Janseva Mandal — Vapi a Charitable Trunus by Maniben Nagarji Mehta Hospital widely known as "Janseva Hospital" since 19 serving health care services to people of Vapi and surrounding areas which will be spemore and more too needy and poor patient. 2. With the Object of Access to safe and clean drinking water, we have installed water.			
		treatment facility in chhiri village located near by site. 3. Bayer vapi received " Certificate of Appreciation" under the category of "Cohesive strategic CSR partnership project" from Gujarat CSR Authority (GCSRA) for contribution towards " Youth Education program"			
		CLUARA COR AUTHORITY In manufacture of the control			

	BA	YER VAPI PVT. LTD.
	EC No: J-11011/300/2015-IA.II (I)	Compliance Status report (October,17 - March, 18)
Sr.No.	EC Conditions	Compliance Status
10	The company shall undertake eco-development measures including community welfare measures in the project area for the overall improvement of the environment.	
11	A separate Environmental Management cell equipped with full fledged laboratory facilities shall be set up to carry out Environmental Management and Monitoring functions.	Site has separate environment cell equipped with full fledged laboratory facilities to carry environment management & monitoring functions.
12	per annum to implement the conditions stipulated by the Ministry of Environment and Forests as well as the state	The Site has provided adequate fund both capital and recurring to implement th conditions stipulated by MOEF & CC and GPCB along with implementation schedule Also it is ensured that the fund so provided shall not diverted for any other purpose The total recurring budget for the year 2017-18 for Environment is 58.7 cr.
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.	
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-17 to September-1 submitted to Regional office of MOEF & CC, Bhopal, Respective zonal office of CPCB, Vadodara and GPCB through our letter No.ENV/14/17/2411. A copy of Environmental Clearance and six monthly compliance status of EC report in uploaded on company's website.

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	BA	YER VAPI PVT. LTD.				
	EC No: J-11011/300/2015-IA.II (I) Compliance Status report (October,17 - March, 18)					
Sr.No.	EC Conditions	Compliance Status				
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 hard copy of EC compliance report submitted to the Bhopal Regional Offices of				
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 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					