RM702531323IN IVR:8277702531323
RL MAHAD SO <402301>
Counter No:1,03/12/2018,12:09
To:K SINGH,NAGPUR
PIN:440001, Nagpur GPO
From:PRIVI ORGAN,MAHAD
Wt:410gms
Amt:125.00(Cash)
<Track on www.indiapost.gov.in>
<Dial 1800 266 6868>

Ref. No: POIL/U-II/EC-Compliance/18-19/141 Date: 01.12.2018

To,
Shri Kanwarjeet Singh (IFS)
Additional Principal Chief Conservator of Forest
Ministry of Environment, Forest & Climate Change
Regional Office (West Central Zone)
Ground Floor, East Wing, New Secretary Building,
Civil Lines, Nagpur- 440001

Sub: Half Yearly Environmental Clearance Compliance Report of M/s Privi Organics India Ltd. Unit-II, Plot No.:C-3,4,5,6,6/1,7,8,9,33/1 & X-9,10,11 MIDC area, Mahad, Dist.- Raigad.

Ref: Environment Department, MS, SEIAA Letter – SEAC 2012/CR. 43/TC-2 Dated 8th Oct' 2015

Dear Sir,
With reference to the proposal for Grant of Environmental clearance for expansion of aroma chemical manufacturing in Unit-II on plot No.:C-3,4,5,6,6/1,7,8,9,33/1 & X-9,10,11 MIDC area, Mahad, Dist.-Raigad by M/s Privi Organics India Ltd.; herewith submitting the six monthly compliance report for the period of **Jun-2018 to Nov-2018**, to fulfill EC conditions dated 08.10.2015

We will mail you the soft copies of the report to the Email: moefregionalofficenagpur@gmail.com

Also we are enclosing herewith CD of the documents mentioned above for your reference.

We will be sending the compliance report regularly to this office.

Thanking You,
Yours Faithfully,

For Privi Organics India Limited, Unit II

Vijaykumar Sadilage
Sr. GM-EHS

Copy to: 1. Shri. T.C. Benjamin, IAS (Retd.), Chairman, SEAC
2. Additional Secretary, MoEF & CC, New Delhi.
3. Secretary, Environment Department & MS.
4. Member Secretary, 5. Regional Office, 6. Sub Regional Officer, MPCB-Raigad
7. Collector, Raigad.
8. IA-Division, Monitoring Cell, MoEF, Paryavaran Bhavan
9. Director (TC-1), Dy. Secretary (TC-2), Scientist-1, Environment Department

Annexure-A

Compliance Report		
SEAC 2012/CR. 43/TC-2		Reporting Date: 01.12.2018
Environmental clearance compliance Report for proposed aroma chemical manufacturing in Unit-II on plot No.:C-3,4,5,6,6/1,7,8,9,33/1 & X-9,10 & 11 MIDC area, Mahad, Dist.: Raigad by M/s Privi Organics India Ltd.		
POINT NO.	**SPECIFIC CONDITIONS**	**COMPLIANCE STATUS**
I.	No additional land shall be used/ acquired for any activity of the project without obtaining proper permission.	Utilized existing MIDC approved land for project expansion. Total Plot Area=59416 sq.mt. Area used= 57440 sq. mt.
II.	For controlling fugitive natural dust, regular sprinkling of water & wind shields at appropriate distance in vulnerable distances in vulnerable areas of plant shall be ensured.	During construction phase water sprinklers used to control dust emissions, sprinklers provided at coal storage area. Internal roads are RCC or bituminous. RM in Powder form was utilizing in very small quantity and hence there are no any fugitive emissions from process/there is no dust generation on roads
III.	Regular monitoring of air quality, including SPM & SO2 both in working zone and ambient air shall be carried out in and around power plant and records shall be maintained. The location of the monitoring station and frequency of monitoring shall be decided in consultation with Maharashtra Pollution Control Board (MPCB) & submit repot accordingly to MPCB.	The location and frequency of AAQ monitoring was decided in consultation with MPCB. AAQ Monitoring at 4 Nos. locations and frequency of monitoring is twice in a week 1. South side of Plot, Near Main Gate 2. North Side, Near Gate 3. East Side- Near ETP 4. North East- Near Boiler Area Avg. Concentration- PM2.5 - 16.74 µg/m3 Consent limit = 80 µg/m3 PM10 – 52.72 µg/m3 Consent limit =100 µg/m3 SO2- 11.21 µg/m3 Consent Limit 80 µg/m3 Work Zone monitoring at 8 locations and frequency of monitoring is once in a six month; 1) Pilot Plant 2) BSR/Blending 3) Incinerator plant 4) Damascone plant 5) Sustainability plant 6) DHMOL plant , 7) Pilot plant Second Floor, 8) R& D
IV.	Necessary arrangement shall be made to safety & ventilation arrangement in furnace area.	Not applicable.
V.	Proper Housekeeping programmers shall	Housekeeping maintaining at shop floor and daily

	be implemented.	checklist is maintained and monitored. Refer Annexure for daily check list.
VI.	In event of the failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall be restart the until desired efficacy has been achieve.	Preventive maintenance of Pollution Control system (ETP, STP, ESP, Incineration, DG set-acoustic enclosure) conducting on quarterly basis, Calibration of measurement devices/equipment conducting once in a six month. Interlocks provided to incinerator plant. Power Back provision made for PCS by DG power. Daily monitoring efficiency of PCS. Preventive Maintenance Schedule attached **as Annexure**.
VII.	A stack of adequate height is based on DG set capacity shall be provided for control and dispersion of pollution from DG set. (If applicable)	DG set stacks provided at height 12 Mtr as per MPCB Consent conditions and acoustic enclosure provided to control noise, enclosed MPCB consent. DG stacks monitored on quarterly. Average Concentration- PM- 80.16 mg/nm^3 Consent Limit- 150 mg/nm^3 SO2- 1.35 Kg/day Consent Limit-7.4 kg/day.
VIII.	A detailed scheme of rain water harvesting shall be prepared and implemented to recharge ground water.	About 1468 kl Rainwater water harvested in year 2018-19 and reduced 1% fresh water requirement from MIDC.
IX.	Arrangement shall be made for effluent and storm water does not get mix.	Separate storm and effluent drainage are provided. No mixing of both drain at any place
X.	Periodic monitoring of ground water shall be undertaken and results analyzed to ascertain any change in the quality of water. Results shall be regularly submitted to the Maharashtra Pollution Control Board.	Water requirement is supplied by MIDC through Pipeline; there is no ground water abstracted.
XI.	Noise level shall be maintained as per standard. For people working in the high noise area requisite personal Protective equipment like earplug etc. shall be provided.	Identified high noise area boiler & DG Acoustic enclosure provided to DG sets and Blowers, silencer provided at high noise equipments, displayed signage and provided /made mandatory to use ear muff and plug to employee working in high noise area. Monitoring done Quarterly and observed average value 74.7 dB(A) day time and 69.2 dB(A) Night time on dated 17.11.2018
XII.	The overall noise level in and around the plant are shall be kept in well with in the standards by providing noise control measures including acoustic hoods, silencers, enclose, etc on all sources of noise generation the ambient noise level shall be conform to standards prescribed under Environment (Protection) Act , 1986 Rules, 1989.	Acoustic enclosure provided to DG sets and Blowers, silencer & enclosures provided at high noise area. DG Noise level monitoring on quarterly. Ambient Noise levels monitored at 19 locations and observed average levels are 64.5 dBA night time, 71.7 dBA day time, which conform standards prescribed under Environment (Protection) Act , 1986 Rules, 1989.

Sr. No.	Test Location	Results		Unit
		Daytime	Night Time	
01	Near Main Gate	68.3	52.1	dB(A)
02	Near ETP	65.4	60.3	dB(A)
03	Near Minar Gate	69.2	54.7	dB(A)
04	Near Material Gate	73.0	55.4	dB(A)
05	H.W. Area	74.1	67.8	dB(A)
06	Near Damascone Plant Entrance	70.9	68.7	dB(A)
07	Vira Gate	72.6	67.1	dB(A)
08	Chamundi Gate	74.5	64.8	dB(A)
09	CST East Side	73.2	69.0	dB(A)
10	Near CST Sprinkler	72.9	67.2	dB(A)
11	Near Work Shop	71.3	64.5	dB(A)
12	Near OHC	65.9	60.3	dB(A)
13	Near Production Office	69.4	68.6	dB(A)
14	Near Second Sprinkler	68.3	66.3	dB(A)
15	Near Main Gate	74.6	68.1	dB(A)
16	Near DM Plant	73.8	66.1	dB(A)
17	Coal Store	74.6	68.7	dB(A)
18	Crusher Area	74.8	67.5	dB(A)
19	Boiler East Side	74.7	69.2	dB(A)

XIII.	Green belt shall be developed and maintain around the plant periphery. Green belt Development shall be carried out considering CPCB guideline including selection of plant species and consultation with local DFO/ Agriculture Dept.	Green belt developed in and around plot premises and plant species selected in consultation with Agriculture Dept. • Green Belt developed Within Premises- 3821 sq. mtr. (10.33%) • Green Belt developed outside plot within MIDC- 51577 sq. mtr. (66 %) It includes our Unit I,II &III.
XIV.	Adequate safety measures shall be provided to limit the risk zone within the plant boundary, in case of an accident. Leak detection shall also be installed at strategic place for early detection and	We have provided certain safety measures as; • All Electrical Fittings – FLP confirming to Class C • Hydrogen & Hydrocarbon Gas Detectors

	warning.	provided at Cascade, trolley shed, CST storage tanks, MA Cylinder storage area etc. for early detection and warning. • Operations are controlled through DCS- with inbuilt safety interlocks. • Flame Detectors – installed near the hydrogen vent, also Nitrogen & steam snuffing arrangement made near flame arrestor. • Safety Relive valve, Rupture Disk, Breather Valve provided at respective tanks and reactors. • Pressure Reducing stations – with periodical checks • Manual Call Point provided at respective points. • Smoke and heat detectors provided at MCC, PCC and chemical storage area for early detections and warning.

S.N.	Zone	Location	Smoke/Heat Detector No.
1.	2	UNIT-2 PCC ROOM	U2PCC JB
2.	2	UNIT-2 PCC 1	SD-U2PCC1
3.	2	UNIT-2 PCC 2	SD-U2PCC2
4.	2	UNIT-2 HT BREAKER SIEMENS	SD-BRK1 SIEMENS
5.	2	UNIT-2 HT ROOM RMU ABB	SD-BRK2 ABB
6.	2	CST MCC B TOP	SD-1101 CST MCC
7.	2	CST MCC C TOP	SD-1102 CST MCC
8.	2	CST 1st.FLOOR MCC	SD-1103 CST MCC
9.	2	DHMOL MCC1	SD-101 DHMOL MCC
10.	2	DHMOL MCC2	SD-102 DHMOL MCC
11.	2	DHMOL MCC3	SD-103 DHMOL MCC
12.	2	H2 GENERATION MCC	SD-301 H2 GEN.
13.	2	PILOT MCC-1	SD-901 PILOT MCC1
14.	2	PILOT MCC-2	SD-902 PILOT MCC2
15.	2	ORANGE MCC	SD-801 ORANGE
16.	2	DAMASCON MCC1	SD-701 DAMAS MCC
17.	2	DAMASCON MCC2	SD-702 DAMAS MCC
18.	2	DAMASCON	SD-703 DAMAS

				MCC3	MCC
19.	2	HYDROGENATION MCC1	SD-201 H2 PLANT		
20.	2	HYDROGENATION MCC2	SD-202 H2 PLANT		
21.	6	JBF Gr.floor-1	SD-U2JBF01		
22.	6	JBF Gr.floor-2	SD-U2JBF02		
23.	6	JBF Gr.floor-3	SD-U2JBF03		
24.	6	JBF Gr.floor-4	SD-U2JBF04		
25.	6	JBF Gr.floor-5	SD-U2JBF05		
26.	6	JBF Gr.floor-6	SD-U2JBF06		
27.	6	JBF Gr.floor-7	SD-U2JBF07		
28.	6	JBF Gr.floor-8	SD-U2JBF08		
29.	6	JBF Gr.floor-9	SD-U2JBF09		
30.	6	Prod. record room	SD-U2JBF010		
31.	6	JBF Raw material-1	SD-JBFRM01		
32.	6	JBF Raw material-2	SD-JBFRM02		
33.	6	JBF 1st floor-1	SD-U2JBF11		
34.	6	JBF 1st floor-2	SD-U2JBF12		
35.	6	JBF 1st floor-3	SD-U2JBF13		
36.	6	JBF 1st floor-4	SD-U2JBF14		
37.	6	JBF 1st floor-5	SD-U2JBF15		
38.	6	JBF 1st floor-6	SD-U2JBF16		
39.	6	JBF 1st floor-7	SD-U2JBF17		
40.	6	JBF 1st floor-8	SD-U2JBF18		
41.	6	Training hall-1	SD-U2TRN11		
42.	6	Training hall-2	SD-U2TRN12		
43.	6	JBF Relay Module for Hooter near Engineering dept.	U2JBFJB		
44.	2	Pilot MCC expansion	SD-903PILOTMCC3		
45.	5	Xerox machine office-1	SD-R&DBL11		
46.	5	Xerox machine office-2	SD-R&DBL12		
47.	5	QA Stability Room	SD-R&DBL13		
48.	5	QC Sulpher analyzer Room	SD-R&DBL14		
49.	5	QC Sample store Room	SD-R&DBL15		
50.	5	QA Top floor store Room	SD-R&DBL16		
51	5	SERVER ROOM R & D BLOCK	SD-U2SRM1 R&D		

XV.	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per Factories Act.	Health checkup of employee conducted July 2018 annually and employee working in hazardous chemical area, there health checks up conducting on six monthly. Records maintained in Form No. 7.

<table>
<tr><td>XVI.</td><td>The company shall make arrangement for protection of possible fire hazard during manufacturing process in material handling.</td><td>• All process SOP developed, implemented and employee trained.
• Adequate vent, flame arrester provided to solvent storage tanks.
• Earthing and boding provided.
• Breather valve provided to CST storage tanks.
• Earth integrity system provided at solvent tanker unloading area.
• Early Detection system- Hydrogen, MA, DMS gas detectors, Smoke and heat detectors provided at respective locations.
• Material Compatibility maintained during storage.
• Sprinkler system provided to CST storage tanks, H2 cascade and trolley shed, MA Tonner Storage area.</td></tr>
<tr><td>XVII.</td><td>The project authorities must strictly comply with the rule and regulations with regards to handling and disposal of hazardous wastes in accordance with Hazardous waste (Management and Handling) Rule, 2003 (amended). Authorization from MPCB shall be obtain for collection/treatment/storage/disposal of hazardous wastes.</td><td>Obtained authorization from MPCB for Air, water & hazardous waste generation & disposal. MPCB Consent No. Format 1.0/ BO/ CAC-Cell/ UAN No.19444/4th CAC/1711000858, dt.-24.11.2017 valid up to 28.02.2022. Complied consent conditions in accordance hazardous waste handling and disposal. Annual Return (Hazardous Waste) Form 4 submitted on 11.06.2018. Hazardous waste Disposal Membership (No. MWML-HzW-MHD-408-Validity up to 31.03.2020). HW Disposed during period Jun. to Nov. 2018;
<table>
<tr><th>HW Cat.</th><th>Deposed Qty. MT</th><th>Consent Limit, MT/ A</th><th>Disposal</th></tr>
<tr><td>34.3</td><td>123.390</td><td>480</td><td rowspan="3">CHWTSDF-MWML</td></tr>
<tr><td>36.1</td><td>245.030</td><td>564</td></tr>
<tr><td>5.2</td><td>0</td><td>1.8</td></tr>
<tr><td>5.1</td><td>0.963</td><td>6.0</td><td rowspan="2">Sold to MPCB authorized</td></tr>
<tr><td>33.3</td><td>1189 Nos.</td><td>3312 Nos.</td></tr>
</table></td></tr>
<tr><td>XVIII.</td><td>The company shall under take following Waste Minimization Measures:
• Metering of quantities of active ingredients to minimize waste.
• Reuse of by- products from the process as raw material substitutes in other process.
• Maximizing Recoveries.
• Use of automated material transfer system to minimize spillage.</td><td>• Waste generation & disposal quantity: refer point No. XVII.
• Automated material transfer process along with closed system provided in order to control material leakage/spillage. Early detection system provided.
• By products are sold to MPCB Authorized agency in order to convert it into product form.</td></tr>
</table>

<table>
<tr><td>XIX.</td><td>Regular Mock drills for the on-site emergency management plan shall be carried out. Implementation of changes/ improvements required, if any, in the on site management plan shall be ensured.</td><td>Mock drills conducting on quarterly basis. From Jun-Nov 2018- 2 Nos. of mock drill conducted and compliance report submitted to DISH. Mock drill conducted on 30.08.2018 & 20.10.2018.</td></tr>
<tr><td>XX.</td><td>A separate environment management cell with qualified staff shall be set up for implementation of the stipulated environmental safeguards.</td><td>Separate environmental cell developed having well equipped laboratory to carry out the environmental management and monitoring function
An environment management Cell is responsible for implementation Of EMP
The Composition of the Environment Management Cell and responsibilities of various member are given below
Environment Staff: Manager, Executive, Officer, Operator,. Total = 26 No.
<table>
<tr><th>Sr. No.</th><th>Designation</th><th>Responsibility</th></tr>
<tr><td>1</td><td>Sr. GM-EHS.</td><td>Overall responsibility for Environmental Issue of the plant , Environment policy and direction</td></tr>
<tr><td>2</td><td>EHS. Manager</td><td>Daily monitoring of ETP operation and environmental control system connected to EHS discipline.
Ensure the legal compliance communicated to regulatory authority.</td></tr>
<tr><td>3</td><td>EHS officer</td><td>Overall in change in operation of environment management facilities
Ensure environmental monitoring as per SOP
Ensure record of generation, handling, storage, transportation and disposal of Solid HW
Ensuring legal compliance by properly under taking activities as laid down by various regulatory agencies from time to time and arranging awareness program amog the worker</td></tr>
</table></td></tr>
<tr><td>XXI.</td><td>Transportation of ash will be through closed container and all measure should be taken to prevent spillage of the ash.</td><td>Transportation of fly ash doing through closed container. Fly ash sold to MPCB Authorized Agency (M/s. Yamuna Bricks Manufacturing. MPCB Consent No. MPCB/SROM/15/11331/0016 dated 26.08.15 valid up to 31.08.2018, Renewal application submitted to MPCB on 08.07.2018). Last Disposed quantity is 12.540 MT on dated 14.11.2018.</td></tr>
<tr><td>XXII.</td><td>Separate silos will be provided for collection and storing bottom ash & fly ash.</td><td>Not applicable.</td></tr>
<tr><td>XXIII.</td><td>Separate funds shall be allocated for</td><td>Yes. Separate funds of Rs. 295 Lacks are</td></tr>
</table>

	implementation of environmental protection measures/ EMP along with item wise brakes up. This cost shall be included as a part of the project cost. The funds earmarked for the environmental protection measures shall not be diverted for other purpose and year wise expenditure should reported to the MPCB & this department.	Earmarked for EMP. **Refer Annexure: III.**
XXIV.	The project management shall advertise at least in two local news papers widely circulated in the region of the project, one of which shall be in Marathi language of the local concerned within seven days of issue of this letter, informing that the project has been accorded environmental clearance and copies if clearance letter are available with Maharashtra Pollution Control Board and may also be seen at Website http://ec.maharastra.gov.in	EC obtained advertisement published in Local Marathi news paper Dayanik Sagar on 24.10.2015 and in national English news paper Indian Express on 24.10.2015.
XXV.	Project Management should submit half yearly compliance report in respect of the stipulated prior environment clearance terms and conditions in hard & soft copies to the MPCB & this department on 1st June & 1st December of each calendar year.	Last half yearly compliance report submitted to MPCB and RO, MoEF, Nagpur on 17.06.2018 for period Dec-2017 to May- 2018.
XXVI.	A copy of the clearance letter shall be send by proponent to the concerned municipal corporation and the local NGO, if any, from whom suggestion / representation, if any were received while processing the proposal. The clearance letter shall also put on the Website of the company by the proponent.	EC copy submitted to MPCB, DISH, MIDC, Local NGO and Grampanchayat. The clearance letter has been up loaded on the company Website.
XXVII.	The proponent shall upload the status of compliance of the stipulated EC condition including result of monitored data on their website and update the same respectively Zonal officer of CPCB and SPCB .The criteria pollution levels namely; SPM,RSPM,SO2,NOx (ambient levels as well as stack emissions)or criteria sectorai parameters, indicated for the project shall be monitored and displayed at the convenient location near the main gate of	• Six monthly compliance report submitted MPCB, MoEF and copy uploaded on Company Website.

	the company in the public demand.	 • Pollutions levels monitored and levels displayed on Environment Information Board located outside Factory Main entrance gate.
XVIII.	The project proponent shall also submit six monthly report on the status of compliance of the stipulated EC conditions including results of monitoring data (both in hard copies as well as by e- mail) to the respectively Zonal officer of CPCB and SPCB	Six monthly report on the status of compliance of the stipulated EC conditions including result of monitoring data submitted to MPCB.
XXIX.	The environmental statement for each financial year ending 31st March in form –V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986 as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and also be send to the respective Regional Offices of MoEF by e-mail.	Environmental Statement (Form V) for year 2017-18 submitted online on MPCB web portal on 28.09.2018.
XXX.	The environmental clearance is being issued without prejudice to the action initiated under EP Act or any court case pending in the court of law and it does not mean that project Proponent has not violated any environmental laws in the past and whatever decision under EP Act or of the Hon'ble court will be binding on the project Proponent. Hence this clearance does not give immunity to the project Proponent in the case filed against him.	Not Applicable.

Annexure-III

Privi Organics India Ltd, Unit-II

Details of Funds for Environment Protection

S. No.	Pollution Control Measures	Capital Cost Per Annum (Lac)
2	Green Belt development	5.0
3	Solid waste management	20.0
4	Environment Monitoring (Monitoring charges for air, water, noise)	5.5
5	Occupational Health & Hygiene (Includes cost of medical checkup, PPE & first aid kit and PPE, first aid facility, safe drinking water plant & sanitation measures, EHS training & awareness programme, New well equipped Ambulance)	51.0
6	Air Pollution Control Measures	30.0
7	Water Pollution Control Measures	110.0
8	Rain Water Harvesting	3.5
9	CSR/CER Activity	70.0
Total		**295.0**