## Half Yearly Compliance Report 2024 01 Jun(01 Oct - 31 Mar)

## Acknowledgement

Proposal Name	M/s. Raks Pharma Private Limited
Name of Entity / Corporate Office	M/s. Raks Pharma Private Limited
Village(s)	N/A
District	BHARUCH

Proposal No.	SIA/GJ/IND2/174963/2020
Plot / Survey / Khasra No.	N/A
State	GUJARAT
MoEF File No.	SEIAA/GUJ/EC/5(f)/1377/2021

Category	Industrial Projects - 2
Sub-District	N/A
Entity's PAN	****6025P
Entity name as per PAN	Raks pharma private limited

# **Compliance Reporting Details**

**Reporting Year** 2024

Remarks (if any)

**Reporting Period** 01 Jun(01 Oct - 31 Mar)

# **Details of Production and Project Area**

Name of Entity / Corporate Office

M/s. Raks Pharma Private Limited

	Project Area as per EC Granted	Actual Project Area in Possession
Private	0	0
Revenue Land	0	0
Forest	0	0
Others	6.72214	6.72214
Total	6.72214	6.72214

# **Production Capacity**

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity a per CTO
1	Divalproex Sodium	Tons per Annum (TPA)	06/11/2025	180	7.2818 MT	180
2	Pirfenidone	Tons per Annum (TPA)	06/11/2025	2.0	1.8201 MT	2.0
3	Metyrosine	Tons per Annum (TPA)	06/11/2025	0.1	0.02448 MT	0.1
4	Clidinium Bromide	Tons per Annum (TPA)	06/11/2025	0.1	0.02448 MT	0.1
5	Aminocaproic Acid	Tons per Annum (TPA)	06/11/2025	2.0	0.9661 MT	2.0
6	Calcium Gluconate	Tons per Annum (TPA)	06/11/2025	5.0	3.37101 MT	5.0
7	Tramadol HCL	Tons per Annum (TPA)	06/11/2025	115	00	115
8	Metaxalone	Tons per Annum (TPA)	06/11/2025	220	00	220
9	Sidanafil Citrate	Tons per Annum (TPA)	06/11/2025	150	00	150
10	Linezolid	Tons per Annum (TPA)	06/11/2025	80	00	80
11	Citalopram	Tons per Annum (TPA)	06/11/2025	120	00	120
12	Darunavir	Tons per Annum (TPA)	06/11/2025	3	00	3
13	Solifenacin succinate	Tons per Annum (TPA)	06/11/2025	3.5	00	3.5
14	Vardenafil Hydrochloride Trihydrate	Tons per Annum (TPA)	06/11/2025	0.3	00	0.3
15	Eltrombopag Olamine	Tons per Annum (TPA)	06/11/2025	0.5	00	0.5
16	Bosentan	Tons per Annum (TPA)	06/11/2025	0.2	00	0.2
17	Apremilast	Tons per	06/11/2025	0.5	00	0.5

# **Specific Conditions**

Sr.No.	<b>Condition Type</b>	Condition Details	
1	MISCELLANEOUS	Road leading to or at construction site must be paved and blacktopped.	
	ubmission: Being Complied thas constructed RCC-paved road fr	om our unit and within premises.	Date: 17/04/2025
2	Human Health Environment	No excavation of soil shall be carried out without a mitigation measures in place.	dequate dust
	ubmission: Being Complied te dust mitigation measures had been	n taken before excavation of soil.	Date: 17/04/2025
3	Statutory compliance	Main entry and exit shall be separate and clearly m facility.	arked in the
Our uni	ubmission: Being Complied t has provided a designated main ent within the facility.	ry, and a separate, clearly marked exit will also be	Date: 17/04/2025
1	Risk Mitigation and Disaster Management	Unit shall prepare and implement SOP for safe ope works.	ration of the
	ubmission: Being Complied already prepared and implemented S	OP for safe operation of the works.	Date: 17/04/2025
5	Human Health Environment	9 a. PP shall obtain PESO permission for the storag chemicals.	ge of Hazardous
	ubmission: Complied thas obtained the PESO license and	copy of the same is enclosed as Annexure 5	Date: 17/04/2025
5	Statutory compliance	PP shall comply conditions of any subsequent amer expansion or change in product mix, after the 30th Seconsidered as per the provisions in force at that time the Notification vide S.O. 1223 (E) dated 27/03/2020 amendment.	eptember 2020, as mentioned ir
	ubmission: Being Complied comply conditions of any subseque	nt amendment or expansion or change in product mix.	Date: 17/04/2025
		PP shall carry out proposed Project activities in res	pect of Active
7	Statutory compliance	Pharmaceutical Ingredients (API) as per the amended Notification vide s. o. 1223 (E) dated 27/03/2020 and amendments.	l EIA
PPs S	Statutory compliance  ubmission: Being Complied be complied all the subsequent ame	Notification vide s. o. 1223 (E) dated 27/03/2020 and amendments.	l EIA

support (paved)	this, we have constructed RCC roads	ensuring effective containment and environmental	Date: 17/04/2025
9	Statutory compliance	PP shall submit six monthly compliance report of Exception Clearance without fail and the same shall be critically regulatory authority.	
Six mon	ubmission: Complied athly compliance report is submitted apliance is attached as Annexure-01	periodically. Acknowledgement copy of last submitted	Date: 17/04/2025
10	Statutory compliance	Total number of product manufacturing shall not be twenty at given point of time as per the plant capacity layout.	
		d that, at any given time, no more than 20 products were	Date: 17/04/2025
1	Statutory compliance	Unit shall install CEMS (Continuous Emission Monin line to CPCB direction to all SPCB vide letter no. It 29016/04/06PCI-1/5401 dated 05/02/2014 for effluentair emission as per pollution discharge/emission from project and an arrangement shall also be done for reflementation of the company's server, which can be the GPCB/CPCB on real time basis. (For small/Later CPCB of CPCB) and only in the company's server and office the company's server.	B- t discharge and respective ecting the onling be assessable rge/Medium
		(Red Category) and whichever (Air emission and efflusis applicable).	uent discharge)
Our unit air emis			Date: 17/04/2025
Our unit air emis CEMS i	t has installed CEMS (Continuous Ension which is assessable by GPCB/C	is applicable).  mission Monitoring System) for effluent discharge and	Date: 17/04/2025 ondenser s such a manne
Our unit air emis CEMS i  12  PPs So Our unit maximu	t has installed CEMS (Continuous Ension which is assessable by GPCB/C is attached as Annexure-02  Statutory compliance  ubmission: Complied thas provided close loop recovery some solvents and recovered solvents up the solvents up the solvents and recovered solvents up the solvents and recovered solvents up the solvent	is applicable).  mission Monitoring System) for effluent discharge and CPCB on real time basis and complied. Photographs of  Close loop solvent recovery system with adequate c system shall be provided to recover solvent vapours is that recovery shall be maximum and recovered solvent.	Date: 17/04/2025 ondenser s such a manne
Our unit dir emis CEMS i PPs So Our unit maximu GPCB a	t has installed CEMS (Continuous Ension which is assessable by GPCB/C is attached as Annexure-02  Statutory compliance  ubmission: Complied thas provided close loop recovery some solvents and recovered solvents up the solvents up the solvents and recovered solvents up the solvents and recovered solvents up the solvent	mission Monitoring System) for effluent discharge and CPCB on real time basis and complied. Photographs of  Close loop solvent recovery system with adequate c system shall be provided to recover solvent vapours is that recovery shall be maximum and recovered solven reused in the process within premises.	Date: 17/04/2025  condenser s such a manne at shall be  Date: 17/04/2025
Our unit air emis CEMS i  PPs Si Our unit maximu GPCB a  3  PPs Si We have	thas installed CEMS (Continuous Ension which is assessable by GPCB/Cas attached as Annexure-02  Statutory compliance  ubmission: Complied thas provided close loop recovery some solvents and recovered solvents unauthorized vendor only. Photographs  Statutory compliance  ubmission: Complied	mission Monitoring System) for effluent discharge and CPCB on real time basis and complied. Photographs of  Close loop solvent recovery system with adequate c system shall be provided to recover solvent vapours is that recovery shall be maximum and recovered solven reused in the process within premises.  Olvent system with adequate condenser to recover sed in same products and other solvents are disposed to of close loop recovery system is attached as Annexure-  Leak Detection and Repair (LDAR) program shall be implemented as per CPCB guideline. LDAR logbook	Date: 17/04/2025  condenser s such a manne at shall be  Date: 17/04/2025

MBBS anearby lithe short	and CIH. One female nurse is appoint Hospital (Shreya Clinic) for occupation	appointed a part time doctor Mr. Naresh Gadhvi, ted to look after OHC. We also have tied up with the onal Health to ensure the medical treatment within erse condition. Agreement and Photographs of OHC	Date: 17/04/2025
15	Human Health Environment	9 c. PP shall obtain Fire safety certificate/ Fire No Certificate (NOC) from the concern authority as per Rules/ Gujarat Fire Prevention and life Safety Measu	the Prevailing
Fire no	<b>ubmission:</b> Complied objection certificate is not applicable 2020/456894/M-3. The copy of the le	in industry as per Gujarat Gov. letter no. etter is attached as Annexure-07	Date: 17/04/2025
16	Human Health Environment	9 d. Unit shall adopt functional operation/process a system including emergency response to eliminate ri with the hazardous Processes.	
		ess automation system including emergency response to	Date: 17/04/2025
17	Human Health Environment	9 e. PP shall carry out mock drill within the premis prevailing guideline of safety and display proper eva the manufacturing area in case of any emergency or	cuation plan in
Regular Implem		y management plan are being carried out. n the on-site management plan is being updated time to exure-08	Date: 17/04/2025
18	Human Health Environment	9 f. PP shall install adequate fire hydrant system w attachment within premises and separate storage of v same shall be ensured by PP.	
Our uni	tank for fire hydrant system provided	ch foam trolley within premises and separate water. Photographs of fire hydrant system is enclosed as	Date: 17/04/2025
19	Human Health Environment	9 g. PP shall take all the necessary steps for control hazardous within premises ensuring incompatibility material and ensure the storage keeping safe distance prevailing guidelines of the concerned authority.	of storage raw
We hav	ubmission: Complied e provided separate chemical storage al compatibility. Photographs of the se	area, and all hazardous materials stored as per the ame is attached as Annexure10	Date: 17/04/2025
20	Human Health Environment	9 h. PP shall take all the necessary steps for human premises to ensure that no any harm is caused to any worker/employee or labour within premises.	
		Es providing to all employees. List of PPE is attached as	Date: 17/04/2025
21	Human Health Environment	9 i. Flame proof electrical fittings shall be provided	l in the plant

PPs Submission: Complied

Flame p	<b>Submission:</b> Complied proof electrical fittings has been provigable of the same is attached as Annexes	ded in the plant premises, wherever applicable. xure-11	Date: 17/04/2025	
22	Human Health Environment	9 j. Unit shall never store drum/barrels/carboys of ir material/chemical together.	ncompatible	
Our uni		ys of incompatible material/chemical together. ompatibility is attached as Annexure 10	Date: 17/04/2025	
23	Human Health Environment	9 k. Unit shall provide effective Isolation for Proces storage of hazardous chemicals.	s area and	
	<b>ubmission:</b> Complied t has provided isolated process area a	nd Hazardous chemicals storage. Annexure 12	Date: 17/04/2025	
24	Human Health Environment	9 l. Unit shall provide water sprinkler to the ammon cylinder.	ia storage	
PPs Submission: Being Complied Ammonia cylinder is not used. Liquor ammonia in very small quantities area used and adequate safety measures have been put in place to avoid any untoward incident.				
25	Human Health Environment	10. Unit shall comply with all the orders passed by the Hon'ble National Green Tribunal (NGT), New Delhi in Original Application No. 1038/2018 dated 10/07/2018.		
	<b>ubmission:</b> Being Complied I strictly comply NGT order passed in	application No. 1038/2018 dated 10/07/2018.	Date: 17/04/2025	
26	Human Health Environment	Unit shall stand in compliance to Office Memorands Letter No. F. No. 22-23/2018 IA III (Pt) dated 31/10/2 Compliance of Hon'ble National Green Tribunal (NG 19.08.2019 (Published on 23/08/2019) in Original Ap 1038/2018.	2019 regardin T) order dated	
		9.08.2019 published on 23.08.2019 in application no.	Date: 17/04/2025	
27	Human Health Environment	No project/activity in contradiction to the orders pass Hon'ble National Green Tribunal JNGT), New Delhi i Application No. 1038/2018 dated 10/07/2018 shall be the granted Environment Clearance shall stand cancel	n Original carried out el	
	<b>Submission:</b> Being Complied strictly follow NGT order 1038/2018	8 dated 10.07.2018.	Date: 17/04/2025	
28	Human Health Environment	Close loop solvent recovery system with adequate c system shall be provided to recover solvent vapors in that recovery shall be maximum and recovered solver reused in the process Within premises. (If there is in-	such a manne it shall be	

Solven		ty in the manufacturing area to prevent the escape of to GPCB authorized vendor only. Annexure-3	Date: 17/04/2025
29	Human Health Environment	Leak Detection and Repair (LDAR) program shall implemented as per the CPCB guidelines. LDAR Lomaintained.	
	Submission: Complied letection and repair followed and strictle	ly monitored. Annexure no 4	Date: 17/04/2025
30	Human Health Environment	Unit shall explore the possibilities for environment for disposal of incinerable and land fillable wastes be CHWIF/TSDF sites respectively.	
We are		fication product, spent solvent to co-processing cessing facility is attached as Annexure-13	Date: 17/04/2025
31	Human Health Environment	All measures shall be taken to prevent soil and gro contamination.	und water
We are	Submission: Complied e strictly followed CPCB/GPCB guideled pucca flooring Annexure 36	line to avoid soil and ground water contamination. RCC	Date: 17/04/2025
32	Human Health Environment	Unit shall install CEMS in line to CPCB directions letter no. B-29016/04/06PCl-1/5401 dated 05.02.201 discharge and air emission as per pollutants discharge respective project and an arrangement shall be done online monitoring results on the company's server, wassessable by the GPCB/CPCB on real time basis. (Vemission and Effluent discharge) is applicable as per guideline of GPCB/CPCB)	4 for effluent e/emission from for reflecting the chich can be Whichever (Air
Unit h	Submission: Complied as been installed CEMS (Continuous E ission which is assessable to GPCB/CP	Emission Monitoring System) for effluent discharge and PCB on real time basis. Annexure 02	Date: 17/04/2025
33	WATER QUALITY MONITORING AND PRESERVATION	The industrial effluent generation from the project exceed 89 KLD after expansion.	shall not be
Curren 06/11/2		ew Provisional CCA No. AWH 140766 and valid up to ithin consent quantity. Details of wastewater generation project related activity is going on.	Date: 17/04/2025
34	WATER QUALITY MONITORING AND PRESERVATION	Industrial effluent shall be segregated into two stre COD and TDS effluent (2) Low COD and TDS effluent be managed as below. High COD and TDS effluent KLD, High COD and TDS effluent from process sha ETP-1 consists of Primary Treatment unit followed stripper. Then treated effluent shall be evaporated in cum ATFD and 37.60 KLD, MEE condensate shall Premises. Low COD and TDS (75 KLD) 75 KLD, to TDS effluent from process, utility and scrubber shall ETP-2 and Ro plant. 60 KLD RO permeates shall be	ent, and it shall (14 KLD) 14 Il be treated in by solvent in-house MEE be reuse within bw COD and be treated in

		be evaporated in in-house MEE cum ATFD.	
Curren effluen effluen process Then traconden from process will be	It is segregated into two Stream (1) His and treated as per the guidelines. Are swill be treated in ETP-1 consists of reated effluent will be evaporated in its aste will be reuse within Premises. A process, utility and scrubber will be treated to the second of the sec	rovisional CC and A No. AWH-140766, Industrial igh COD and TDS effluent (2) Low COD and TDS mexure 17. 14 KLD, High COD and TDS effluent from Primary Treatment unit followed by solvent stripper. In-house MEE cum ATFD and 37.60 KLD, MEE mnexure 17. 73.61 KLD, low COD and TDS effluent stated in ETP-2 and RO plant. 58.61 KLD RO permeates a underground pipeline. 24 KLD RO reject will be mnexure 17.	Date: 17/04/2025
35	WATER QUALITY MONITORING AND PRESERVATION	Unit shall feed wastewater to in-house MEEs only af the content of effluent for COD/VOC so as not to get a evaporation in order to achieve no impact on Environn Human Health.	ir borne duri
The wa		is first feed to stripper where the traces of volatile liquids ed to MEE for further treatments. Annexure 18	Date: 17/04/2025
36	WATER QUALITY MONITORING AND PRESERVATION	Domestic wastewater generation shall not be exceed proposed project and it shall be treated in ETP. It shall disposed off through soak pit/septic tank.	
Domes	Submission: Complied tic wastewater generation will not exch soak pit/septic tank. Annexure-18	ceed 9 KLD and it is treated in ETP. It is not disposed of	Date: 17/04/2025
37	WATER QUALITY MONITORING AND PRESERVATION	Unit shall provide buffer water storage tank of adequ for storage of treated wastewater during any shut down MEE.	
We hav	Submission: Being Complied we provided adequate capacity of treat dondensate water storage capacity is	ted water storage tank. MEE storage tank capacity is 60 s 30 KL ( 15 KL X 02)	Date: 17/04/2025
38	Human Health Environment	The National Ambient Air Quality Emission Standar the Ministry vide G. S. R. No. 826 (E) dated 16th November shall be complied with.	•
M/s. V nationa		red lab) had monitored the ambient air quality as per the of last ambient air quality monitoring reports is	Date: 17/04/2025
39	Human Health Environment	Third party monitoring of the functioning of the EMS efficiency shall be carried out once in a year through a recognized auditors.	
Third p	Submission: Complied party EMS monitoring has been carried herewith as Annexure 16.	ed out by GPCB recognized auditor and report is	Date: 17/04/2025
40	WATER QUALITY MONITORING AND PRESERVATION	Treated wastewater shall be discharged into GIDC da underground pipeline leading to deep sea only after con the norms prescribe by GPCB to ensure no adverse impli- Health and Environment.	mplying with

The tre goes in		GIDC dahej-Vilayat underground pipeline which scharge parameters with GPCB norms to ensure no ment. Annexure 17	Date: 17/04/2025
41	Human Health Environment	National Emission Standards for Organic Chemical Industry issued by the Ministry vide G. S. R. 608 (E) 21/07/2010 and amended from time to time shall be	dated
M/s. V		ed Lab) had monitored process stack, and the results are ort is attached as Annexure-14 (stack monitoring report)	Date: 17/04/2025
42	Human Health Environment	Unit shall have to adhere to the prevailing area spec GPCB with respect to the discharge of pollutants and the project development in accordance and consisten	l shall carry out
We wi	Submission: Being Complied Il adhere to the prevailing area specificants and project development.	policies of GPCB with respect to the discharge of	Date: 17/04/2025
43	Human Health Environment	Unit shall provide CCTV camera at strategic locati premises with web link facility for the continuous more recording to ensure that there is no discharge from the per the prevailing guidelines of GPCB).	onitoring and
Our ur to ensu		premises for the continuous monitoring and recording premises. Photographs of CCTV is attached as	Date: 17/04/2025
44	WATER QUALITY MONITORING AND PRESERVATION	Total water requirement for the project shall not ex Unit shall reuse 37.60 KLD of treated industrial efflu premises. Hence, freshwater requirement shall not be KLD and it shall be met through GIDC water supply permission from concerned authority shall be obtained of water.	ent within exceed 189.40 only. Prior
Curren 06/11/ data is	2025. The water consumption is within	w Provisional CCA No. AWH 140766 and valid up to a consent quantity. Last six moth water consumption DC letter for withdrawal of water, Effluent generation re 17.	Date: 17/04/2025
45	WATER QUALITY MONITORING AND PRESERVATION	Unit shall provide buffer water storage tank of adec for storage of treated wastewater during any shut downEE.	
	Submission: Being Complied ve provided adequate capacity of treated condensate water storage capacity is	ed water storage tank. MEE storage tank capacity is 60 30 KL ( 15 KL X 02)	Date: 17/04/2025
We ha KL an	a condensate water storage capacity is		
We ha KL and	WATER QUALITY MONITORING AND PRESERVATION	The unit shall provide metering facility at the inlet ETP, MEE and maintain records for the same.	and outlets of

WATER QUALITY
47 MONITORING AND
PRESERVATION

Proper Logbook of ETP, chemical consumption in effluent treatment, quantity and quality of effluent discharge to MEE and GIDC pipeline, quantity and quality of recycle back in process; Power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time.

PPs Submission: Complied

Separate electrical meter is provided for ETP, Logbooks are maintained for operation of ETP showing chemical consumption, power consumption, quantity of effluent evaporated, quantity of condensate water, quantity of salt generation, maintenance. Annexure-19

Date: 17/04/2025

48 AIR QUALITY
MONITORING AND
PRESERVATION

Unit shall not exceed fuel consumption for steam boiler, thermopack, incinerator and D.G set as mentioned below: Sr. No. Source of emission with capacity Stack Height (meter) type of Fuel MT/Day Quantity of Fuel MT/ Day Type of emission i.e. Air Pollutants Air Pollution Control Measures (APCM) Existing: 1 Steam Boiler-(ton/hrsa0-2.0X 2 nos. 30 Bio Coal/Agrowaste 750.00 Kgs/hrs. PM, SO2, NOX Bag Filter and Adequate stack height 2 D.G.Set-500 KVA (1 Nos.) 11 HSD/LDO 70.00 and 250.00 Lit/Hr. Adequate stack height 3 Incinerator 30 Natural Gas/LDO 375 SCM/Hr. PM, HCL, SO2, CO, TOC, HF, Nox, TDF, Cd, Th, Their compounds Hg and its compounds Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Their compounds Two stage Alkali scrubber Proposed: 1 Steam Boiler- (Ton/Hrs.)- 3.0X1 nos. 32 Bio Coal/Agrowaste 750.00 and 1500.00 Kgs/hrs. PM SO2 Nox Multi Cyclone Separator with Bag Filter and Adequate stack height 2 Thermic fluid heater-( Lack K.Cal/hr.) 2.0X 1 nos. and 4.0 X1 nos. 32 HSD/LDO 75.00 Lit./Hr. Adequate stack height 3 D.G. Set-750 KVA (1 Nos.) and 1500 KVA (1 Nos.) 11 Natural Gas/LDO 250.00 and 500.00 Lit/hrs. Adequate stack height Note: The Existing Boiler and Existing D.G. Set will be used as a standby

PPs Submission: Being Complied

Unit does not exceed fuel consumption for steam boiler, thermopack, incinerator and D. G. Set. (we had removed incineration facility because of we dispose our waste to CHWIF, BEIL Dahej, preprocessing/coprocessing to RSPL/Banas Resources LLP), Ref. Current CC and A No. AWH-110974 and provisional CC and A No. AWH-140766,

Date: 17/04/2025

49 AIR QUALITY
MONITORING AND
PRESERVATION

Unit shall provide adequate APCM with flue gas generation source as mentioned above.

PPs Submission: Being Complied

Bag filter system has been installed in the boiler and acoustic enclosure has been provided with DG set as an Air pollution Control Measure, Same is enclosed as Annexure 21. We have removed incineration facility from premises.

Date: 17/04/2025

AIR QUALITY
50 MONITORING AND
PRESERVATION

Unit shall provide adequate APCM with process gas generation source as mentioned below: Sr. No Specific Source of Emission (Name of the Product and process) Type of Emission Stack/Vent Height (Mt.) Air Pollution Control Measure (APCM) Existing 1 Process Reactor 1 HCL 11 Two Stage Alkali Scrubber 2 Process Reactor 2 NH3 11 Phosphoric acid scrubber

**PPs Submission:** Complied

Two stage caustic scrubber and two stage phosphoric acid scrubber are provided as Air Pollution Control measures to control the process emission of HCL and NH3 respectively. Details of APCD is enclosed as Annexure 21.

Date: 17/04/2025

AIR QUALITY MONITORING AND

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The fugitive emission in work zone environment shall be monitored. The emission shall conform to the standards prescribe by

#### **PRESERVATION**

the concerned authority from time to time (e.g. Directors of Industrial Safety and health). Following indicative guideline shall also be followed to reduce the fugitive emission. Internal road shall be concreted or asphalted or paved properly to reduce fugitive emission during vehicular movement. Air born dust shall be controlled with water sprinkler at suitable location in the plant. A green belt shall be developed all around the plant boundary and also along the road to mitigate fugitive and transport dust emission.

### PPs Submission: Complied

Workplace monitoring is conducted annually, and reports are available with us. Please see Annexure 14 Internal road made with RCC to reduce fugitive emission during vehicular movement. Implemented a closed loop process to avoid airborne dust control. Green belt is developed around the boundary wall.

Date: 17/04/2025

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AIR QUALITY MONITORING AND PRESERVATION

Regular monitoring of volatile organic compound (VOCs) shall be carried out in the work zone area and ambient air.

### **PPs Submission:** Complied

volatile organic compound (VOCs) in the workplace area is monitored. Record is available see Annexure14

Date: 17/04/2025

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AIR QUALITY MONITORING AND PRESERVATION For control of fugitive emission, VOCs, following steps shall be followed a. Closed handling and charging system shall be provided for chemicals b. Reflux condenser shall be provided over reactor/vessels. c. Pumps shall be provided with mechanical seals to prevent leakages. d. Air bourn dust at all transfers operation/points shall be controlled either by spraying water or providing enclosure.

### PPs Submission: Complied

a. Closed handling and charging facility are provided for chemicals. b. Reflux condenser installed for reactor/vessels c. Pumps with mechanical seal are provided to prevent leakages. d. HVAC system with filters is provided to control air born dust at all operation/point. Annexure 25

Date: 17/04/2025

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AIR QUALITY MONITORING AND PRESERVATION Solvent management shall be carried out as follows: Measure shall be taken to reuse the process vapours emission as far as possible. Use of Toxic solvent shall be minimum. All venting equipment shall have vapour recovery system. Reactor shall be connected to adequate chilling system to condensate solvent vapours and reduce solvent losses. Reactor and solvent handling pump shall have mechanical seal to prevent leakages. The condensers shall be provided with sufficient HTA and residence time so as to achieve maximum solvent recovery. Solvent shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment whenever solvent handling is done. Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.

#### **PPs Submission:** Complied

We have installed double condenser with cooling and chilling facility. Annexure 3 Reactor is connected with double condenser with cooling and chilling system. Annexure 3 Mechanical seal pump installed to prevent leakages. Annexure 3 Double Condenser with cooling and chilling supply installed to recover maximum solvents. See Annexure 3 Solvent storage area separately made with adequate safety measures. Double earthing is providing to all electrical equipment. Solvent storage tank having flame arrestor with breather valve to prevent losses.

Date: 17/04/2025

55 N

AIR QUALITY MONITORING AND PRESERVATION Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, HCL and VOC shall be carried out in the impact zone and its record shall be maintained. Ambient air quality level shall not be exceed the standard stipulated by the GPCB. If any stage these levels

are found to exceed the prescribe limits, necessary additional control measure shall be taken immediately. The location of the station and frequency of monitoring shall be decided in consultation with the GPCB.

#### PPs Submission: Complied

Ambient Air quality level is monitored on monthly basis and do not exceed the standards stipulated by the GPCB. A Monthly report along with the location of station is maintained. Annexure 14

Date: 17/04/2025

56 WASTE MANAGEMENT

All the hazardous waste management shall be taken care as mentioned below Sr. No. Type / Name of Hazardous waste Specific Source of generation (Name of the Activity, Product etc.) Category and Schedule as per HW Rules Quantity (MT/Annum) Mode of disposal facility Existing Proposed Total 1. ETP Waste ETP Operation Sch. I: 35.3 24.00 20.00 44.00 Collection, Storage, Transportation and Disposal at TSDF site of BEIL/ Safe Enviro Pvt Ltd, Magnad. 2. Used Oil Plant and Machinery Sch. I: 5.1 300.00 0.00 300 Collection, Storage, Transportation, Disposal by selling to GPCB Approved refiners. 3. Discarded Carboys/ Drum / Containers/ Liners/ Bags Raw Materials Sch. I: 33.1 2400 2600.00 5000 Collection, Storage, decontamination, Transportation and disposal by selling to authorized vendor. 4. Process Residue and Waste Distillation and manufacturing process of all products Sch. I: 28.1 20.00 106.00 126.00 Collection, Storage, Transportation, Disposal by GPCB Approved preprocessing, coprocessing or CHWIF. 5. Spent Carbon Manufacturing Process Sch. I: 28.3 0.00 100.00 100.00 Collection, Storage, Transportation, Disposal at Co-processing to GPCB Approved facility. 6. Off specification products Manufacturing Process Sch. I: 28.4 10.00 0.00 10.00 Collection, Storage, Transportation and disposal at CHWIF. 7. Date-expired products Manufacturing Process Sch. I: 28.5 10.00 0.00 100.00 8. Spent Solvent From solvent recovery plant Sch. I: 28.6 25.00 1500 1525.00 Collection, Storage, Transportation and Disposal either by send it to co-processing or by common incineration facility or sell out to authorized end-users who is having Rule-9 permission and after making MoU with industries. 9. Spent Acid (Inorganic Acid) Manufacturing Process Sch. II: B,15 0.00 100.00 100.00 10. Used Filter Cloth Manufacturing Process (From most of the products) Sch. I: 33.2 0.00 1.00 1.00 Collection, Storage, Transportation and disposal at CHWIF. 11. Scrubber Bleed off From Scrubber Sch. I: 28.1 2920.00 0.00 2920.00 Collection, Storage, To In house ETP-2 for further treatment. 12. Mixed Solvents From Solvent Stripper Sch. I: 28.6 0.00 73.00 73.00 Collection, Storage, Transportation and disposal at GPCB approved facility /co-processing or by common incineration facility. 13. MEE Salt From MEE-ATFD Plant Sch. I: 37.3 0.00 100.00 100.00 Collection, Storage, Transportation and disposal at GPCB approved TSDF facility.

#### **PPs Submission:** Complied

We are required to dispose of hazardous waste categories in accordance with CCA No. AWH-110974 and the new provisional CCA No. AWH-140766, which is valid until November 2025. We ensure full compliance with all applicable conditions and dispose of all hazardous waste categories through TSDF, in line with the Hazardous Waste and Transboundary Movement Rules, using manifests and with GPCB-approved Rule 09 permissions only.

Date: 17/04/2025

57 WASTE MANAGEMENT

Authorized end-user shall have permission from the concerned authorities under the rule 9 of the Hazardous and other wastes (Management and Transboundary Movement) Rules 2016.

PPs Submission: Complied

We have to dispose our hazardous and other waste to Rule 9 authorized end users only. Annexure 13

Date:

			17/04/2025
58	WASTE MANAGEMENT	Unit shall explore the possibility of environment frielike co-processing of hazardous waste for disposal of land fillable wastes before sending to CHWIF and TS respectively.	incinerable and
Before	ubmission: Complied sending to CHWIF and TSDF we ex disposal. CHWIF and TSDF MOU C	plore possibility to environment friendly method for Copy find Annexure-13	Date: 17/04/2025
59	WASTE MANAGEMENT	The unit shall submit the list of authorized end-user waste along with MoU signed with them at least two advance prior to the commencement of production. In potential buyers of these items the unit shall restrict the respective items.	month in the absence of
Unit has	ubmission: Complied s submitted the end user of hazardou rule strictly. The list of End users an	s waste along with MoU signed copy to GPCB office. d MOU is attached as Annexure 38	Date: 17/04/2025
60	Corporate Environmental Responsibility	Project Proponent shall allocate the separate fund of lakhs as committed before SEAC. The entire activitie under CSR shall be part of the Environment Manager as per the MoEF and CCs OM no. F no. 22-65/2017-I 30.09.2020. This shall be monitored, and monitoring submitted to regional office of MoEF and CCs as part compliance report and to the District collector. The Manager and the project proponer is shall be posted on the website of the project proponer.	s proposed nent Plan (EMI A.III dated report shall be of half-yearly lonitoring repo
We hav	ubmission: Complied e complied with this point, and the Ce in Annexure 22.	CSR activity has been completed. The report details are	Date: 17/04/2025
61	Human Health Environment	All the environmental protection measures and safe in the Form-1 and PFR submitted by the project proposition of the strictly letter and spirit.	onent and
	ubmission: Being Complied ment protection measures and safeg	uard is provided as per the application.	Date: 17/04/2025
62	MISCELLANEOUS	Water demand during construction shall be reduced curing agents, super plasticizers and other best constructions.	
We hav	ubmission: Being Complied e use best construction practice to re MC material and curing agent used in	duce water demand during construction activity., we n RMC.	Date: 17/04/2025
63	Human Health Environment	First Aid box shall be readily available in adequate times.	quantity at all
	ubmission: Complied I box is readily available with adequ	ate quantity at all the time. First aid box Annexure 06	Date: 17/04/2025
	MISCELLANEOUS	Project Proponent shall ensure that surrounding env be affected due to construction activity. Construction	

		premises and best practice to control the fugitive	Date: 17/04/2025
65	Human Health Environment	All required sanitary and hygienic measures shall be before starting construction activities and to be mainta throughout the construction phase.	
	ubmission: Being Complied nired sanitary and hygienic measures in	is provided and maintained throughout construction	Date: 17/04/2025
66	Statutory compliance	The Project proponent shall strictly comply with the other construction workers (Regulation of Employmer of service) Act 1996 and Gujarat rules made their und subsequent amendment. Local byelaws of concern aut complied in letter and spirit.	nt and condition
We have	ubmission: Being Complied e strictly complied with the Building ent amendments in the Gujarat rules.	and Other Construction Workers Act, 1996, and its	Date: 17/04/2025
67	WASTE MANAGEMENT	Safe disposal of wastewater and municipal solid was during the construction phase shall be ensured.	tes generated
	ubmission: Being Complied terated wastewater and solid waste we	ere safely disposed of during the construction phase.	Date: 17/04/2025
68	MISCELLANEOUS	Project Proponent shall ensure use of Eco-friendly b including fly ash bricks, fly ash paver blocks, ready m (RMC) and leaf free paints in the project.	
We used	ubmission: Complied d eco-friendly building material inclu te. Annexure 23	ding fly ash bricks, fly ash paver block and ready mix	Date: 17/04/2025
	MISCELLANEOUS	The Project proponent shall strictly comply with the other construction workers (Regulation of Employmer	
69	MISCELLANEOUS	of service) Act 1996 and Gujarat rules made their und subsequent amendment. Local byelaws of concern aut complied in letter and spirit.	er and their
PPs S We have	ubmission: Being Complied	subsequent amendment. Local byelaws of concern aut complied in letter and spirit.  and Other Construction Workers Act, 1996, and its	er and their hority shall be Date:
<b>PPs S</b> We have subsequ	ubmission: Being Complied e strictly complied with the Building	subsequent amendment. Local byelaws of concern aut complied in letter and spirit.  and Other Construction Workers Act, 1996, and its	Date: 17/04/2025
We have subseque 70 PPs S	ubmission: Being Complied e strictly complied with the Building tent amendments in the Gujarat rules.  Human Health Environment  ubmission: Being Complied ction material covered in the factory	subsequent amendment. Local byelaws of concern aut complied in letter and spirit.  and Other Construction Workers Act, 1996, and its  Project Proponent shall ensure that surrounding envi be affected due to construction activity. Construction to be covered during transportation and regular water spr	Date: 17/04/2025

		EPA rules for air and noise emission standards.	
	ubmission: Complied c enclosure provided to DG set. And D	O.G. Set photograph Annexure-27	Date: 17/04/2025
72	MISCELLANEOUS	All topsoil excavated during construction activity shahorticulture/landscape development within the project	
	ubmission: Being Complied excavated during construction activity	is used in with in project site for levelling.	Date: 17/04/2025
73	Human Health Environment	Excavated earth to be generated during construction utilized within premises to the maximum extent possible quantity of excavated earth shall be disposed off with the competent authority after taking necessary precauts safety and health aspect. Disposal of excavated earth deconstruction phase shall not create adverse effect on necommunities.	ole and balance the approval of tion for general turing
	ubmission: Being Complied ed earth generated during construction	n phase which is used in project site for levelling.	Date: 17/04/2025
74	Human Health Environment	Windbreaker of appropriate height i.e. 1/3rd of the b and maximum up to 10 meters shall be provided. Individed within the project site shall also be provided with barri	idual buildin
	<b>ubmission:</b> Being Complied reaker of appropriate height i.e. 1/3rd of	of the building project site barricaded provided.	Date: 17/04/2025
75	Human Health Environment	No uncovered vehicles carrying construction material shall be permitted.	l and waste
	•	covered vehicles, uncovered vehicles are strictly	Date: 17/04/2025
76	Noise Monitoring & Prevention	Ambient noise level shall conform to residential standuring day and night. Incremental pollution load on that and noise quality shall be closely monitored during cophase.	e ambient air
Ambien		dential standard during day and night. Ambient noise bry, Vasundhara Enterprise) available in Annexure 14.	Date: 17/04/2025
77	Statutory compliance	Fly ash shall be used in construction whenever applied provision of fly ash notification under the E.P. Act 198 subsequent amendment from time to time.	
We will	ubmission: Being Complied use fly ash in construction whenever attion under the E.P. Act, 1986.	applicable, as per the provisions of the Fly Ash	Date: 17/04/2025
78	Human Health Environment	No loose soil or and or construction and demolition of other construction material that cause dust shall be left Uniform piling and proper storage of sand to avoid fug shall be ensured	uncovered.

No loo	ered. Uniform piling and proper storag	vaste, or any other dust-generating materials were left ge of sand were ensured to prevent fugitive	Date: 17/04/2025	
79	Human Health Environment	Dust mitigation measures shall be displayed promit construction site for easy public viewing.	nently at the	
		ominently at the construction site for easy public	Date: 17/04/2025	
80	WASTE MANAGEMENT	Construction material and waste should be stored only within earmarked area and roadside storage of construction material and waste shall be prohibited.		
Constr	Submission: Being Complied uction materials and waste were stored prohibited.	d only in the designated areas, and roadside storage was	Date: 17/04/2025	
81	WASTE MANAGEMENT	Construction and demolition waste processing and shall be identified and required dust mitigation measurat the site. (if applicable)		
	Submission: Being Complied opplicable as there was no construction	and demolition waste processing and disposal site at the	Date: 17/04/2025	
82	WATER QUALITY MONITORING AND PRESERVATION	Industry should provide separate dedicated washing washing/bathing of worker and the wastewater gener same should be taken into ETP.		
A sepa	Submission: Being Complied rate dedicated washing area for hand ted is being treated in the ETP.	washing of workers is provided, and the wastewater	Date: 17/04/2025	
83	WATER QUALITY MONITORING AND PRESERVATION	The water meter shall be installed, and record of da water consumption shall be maintained.	ily and monthl	
	Submission: Complied meter installed and record maintained	regularly. Annexure 24	Date: 17/04/2025	
84	WATER QUALITY MONITORING AND PRESERVATION	All efforts shall be made to optimize water consum exploring best available technology (BAT). The unit continuously strive to reduce, recycle and reuse the transfer of the continuously strive to reduce.	shall	
We im	Submission: Complied plement best practices to minimize free by following RO plant. please find An	eshwater consumption by using and recycling treated nexure-26	Date: 17/04/2025	
85	AIR QUALITY MONITORING AND PRESERVATION	In case of use of spray dryer, the unit shall provide efficient APCMs with spray dryer so that there shoul adverse impact on human health and environment. U out third party monitoring of the proposed spray drye through the credible institute and study report of imp Environment and Human Health shall be submitted to year along with half yearly compliance report.	d not be any nit shall carry or and its APCN acts on	

	Submission: Complied Dryer is not using for our industrial acti	ivity hence this condition is not applicable to our	Date: 17/04/2025
86	AIR QUALITY MONITORING AND PRESERVATION	Acoustic enclosure shall be provided to D.G set (if mitigate the noise pollution and shall conform to the and noise emission standards.	
	Submission: Complied ic enclosure provided to D. G. set to m	itigate the noise pollution. See Annexure 27	Date: 17/04/2025
87	AIR QUALITY MONITORING AND PRESERVATION	Stack/vents (whichever is applicable) of adequate laprovided as per the prevailing norms for flue gas em gas emission.	
Stack/v	Submission: Complied vents of adequate height are provided as on/process gas emission. Annexure 20	s per the prevailing norms for flue gas	Date: 17/04/2025
88	AIR QUALITY MONITORING AND PRESERVATION	Flue gas emission and Process gas emission (if any to the standard prescribed by the GPCB/CPCB/MoE time, emission level should go beyond the stipulated	F and CCs. At 1
Flue ga accredi report i	ited laboratory and record is maintained	(if any) are monitored on monthly basis by NABL d. Copy of Flue Gas Stack monitoring and analysis issions parameters are maintained within the	Date: 17/04/2025
89	AIR QUALITY MONITORING AND PRESERVATION	All the reactor/vessels used in the manufacturing p closed to reduce the fugitive emission.	rocess shall be
	Submission: Being Complied manufacturing, we close all reactors and	nd process vessels to prevent fugitive emissions.	Date: 17/04/2025
90	AIR QUALITY MONITORING AND PRESERVATION	Adequate Air Pollution Control Measures (APCM) provided.	) shall be
We hav		am Boiler. Two stage alkali scrubber system is sphoric acid scrubber is provided as APCM to Process	Date: 17/04/2025
91	AIR QUALITY MONITORING AND PRESERVATION	The unit shall adhere to sector specific guidelines/ by GPCB/CPCB from time to time for effective fugi control. The project proponent shall monitor fugitive plant premises at least once in every quarter through under Environment (Protection) Act, 1986.	tive emission e emission in the
We me	Submission: Complied easure and record fugitive emissions wit onitoring is also conducted monthly. See	thin the plant premises every month, and workplace ee Annexure 14	Date: 17/04/2025
92	AIR QUALITY MONITORING AND PRESERVATION	Unit shall take adequate measure to control odor not industrial activity which may include measures likeagent with atomizer system (water curtain), closed/a	use of masking

		material handling system, containment of the odor vulr etc.	nerable areas
Raks ha		els and a scrubber system in the manufacturing process to r loading and unloading are carried out in a closed able areas.	Date: 17/04/2025
93	WASTE MANAGEMENT	Hazardous waste shall be dried, packed and stored in designated hazardous waste storage facility with pucca leachate collection facility before its disposal.	
Hazard	<b>Submission:</b> Complied ous wastes are stored in designated H chate collection facility, before its dis	Hazardous waste storage facility with impervious bottom sposal. Annexure 28	Date: 17/04/2025
94	WASTE MANAGEMENT	The unit shall obtain necessary permission from the r site and CHWIF. (whichever is applicable)	nearby TSDF
Raks ha	<b>Submission:</b> Complied as obtained the membership of TSDF at Annexure 29	for ETP Sludge and other waste the validity is for	Date: 17/04/2025
95	WASTE MANAGEMENT	Truck/tankers used for transportation of hazardous w accordance with the provision under the motor vehicle rules made their under.	
"All has and the		compliance with the Motor Vehicles Act (MVA), 1989, infrastructure vehicle and a GPCB-approved transporter	Date: 17/04/2025
96	WASTE MANAGEMENT	The design of truck/tanker shall be such that there is during transportation.	no spillage
A dedic	Submission: Being Complied cated vehicle is used for transportation or tree vehicles are employed for the more	n to prevent spillage, and only GPCB-approved overnent of hazardous materials.	Date: 17/04/2025
97	WASTE MANAGEMENT	All possible effort shall be made for Co-processing o waste prior to disposal into TSDF/CHWIF.	f the begande
			i the nazardo
All pos	Submission: Being Complied sible efforts has been made to co-proced-WIF facilities.	cess hazardous waste before its disposal at	Date: 17/04/2025
All pos TSDF/0	sible efforts has been made to co-pro-	Management of fly ash (if any) shall be as per the fly 2009 and its amendment time to time and it shall be en there is 100 percent utilization of fly ash to be generate unit.	Date: 17/04/2025 as notification
All pos TSDF/0 98 PPs S Manage	waste Management  Waste Management  Submission: Being Complied ement of fly ash (if any) will be as pe	Management of fly ash (if any) shall be as per the fly 2009 and its amendment time to time and it shall be en there is 100 percent utilization of fly ash to be generate	Date: 17/04/2025 as notification

The unit	ubmission: Being Complied transports hazardous waste exclusive CHWIF, co-processing, or to end-use	vely through GPS-enabled vehicles for disposal at ars authorized under Rule 9.	Date: 17/04/2025
100	WASTE MANAGEMENT	Unit shall submit the list of authorized end user of wastes along with MoU signed with them at least two advance prior to commencement of production. In ab potential buyers of these items, the unit shall restrict respective item.	o months in osence of
We have ensure ti		norized buyers, and prior intimation is given to them to by impact on production. These conditions will be	Date: 17/04/2025
101	AIR QUALITY MONITORING AND PRESERVATION	Unit shall provide Wall to Wall carpeting in vehicle areas within premises to avoid dusting.	e movement
	ubmission: Being Complied cted with RCC-paved carpet road.		Date: 17/04/2025
102	WASTE MANAGEMENT	The by-product which fall under the purview of the other wastes (Management and transboundary Move shall be handled as per the said rules and necessary p the concern authority shall be obtained.	ment) rules 201
	ubmission: Being Complied licable as there is no by-product is g	enerated.	Date: 17/04/2025
103	Statutory compliance	The occupier/manager shall strictly comply the profactory act 1948 and the Gujarat Factories Rules 196	
We will	ubmission: Complied strictly follow this condition and ma 963. See Annexure 30	ade and follow factory act 1948 and Gujarat factories	Date: 17/04/2025
104	WASTE MANAGEMENT	The company shall strictly comply with the rules as with regards to handling and disposal of hazardous was accordance with the hazardous and others wastes (M Transboundary Movement) rules 2016, as may be an time-to-time authorization of the GPCB shall be obtated to the content of the Collection/treatment/Storage/Disposal of hazardous of the company	vaste in anagement and nended from iined for
The con	1 06/11/2025. Provision CCA no AW	PCB - Gandhinagar vide letter No. AWH 110974, and /H 140766 Dated 11/03/2025 and valid up to	Date: 17/04/2025
105	WASTE MANAGEMENT	Industry shall dispose its hazardous wastes through pre-processing to the extent possible prior to disposa incineration/landfill as per provision of hazardous an (Management and transboundary movement) rules, 2	l to d other wastes
All poss	ubmission: Being Complied ible efforts have been made to co-prectives.	rocess hazardous waste before its disposal at	Date: 17/04/2025

106	Risk Mitigation and Disaster Management	All necessary precautionary measure shall be taken to kind of accident during storage and handling of toxic/h chemicals.	
All nece	ubmission: Being Complied essary precautionary measure already of toxic/hazardous chemicals.	takes to avoid any kind of accident during storage and	Date: 17/04/2025
107	Statutory compliance	The Project proponent authority shall strictly comply provisions made in Manufacturing, Storage and Import chemicals Rules (MSIHC) 1989, as amended time to the liability insurance act for handling of hazardous chemical Necessary approvals from the chief controller of exploit concerned Govt. Authority shall be obtained before controller. Requisite On-site and off-site disaster man have to be prepared and implemented.	of Hazardou me and public cals etc. sives and mmissioning
Raks Ph Liability necessar relevant	y Insurance policy, which is regularly ry approvals for solvent storage were	of the MSIHC Rules, 1989. We maintain a valid Public updated. Prior to commissioning the project, all obtained from the Chief Controller of Explosives and site emergency plan is in place and is reviewed and	Date: 17/04/2025
108	Statutory compliance	Sufficient peripheral open passage shall be kept in the for free movement of fire tender/emergency vehicle are premises.	
Sufficie	ubmission: Being Complied nt peripheral open passage is kept in t mergency vehicle around the premise	he margin area for free movement of fire s.	Date: 17/04/2025
109	Statutory compliance	Storage of flammable chemicals shall be sufficiently production area.	away from th
	ubmission: Being Complied of flammable chemicals is already sur	fficiently away from the production area.	Date: 17/04/2025
110	Risk Mitigation and Disaster Management	All the toxic/hazardous chemicals shall be stored in a quantity and all necessary permission in this regard shall before commencing the expansion activities.	-
All the t	ard will be obtained before commencing	ed in optimum quantity and all necessary permission in ng the expansion activities. For PESO license	Date: 17/04/2025
111	Risk Mitigation and Disaster Management	Sufficient number of fire extinguishers shall be proviplant and storage area.	ded near the
	ubmission: Complied nt number of fire extinguishers is prov	vided near the plant and storage area. Annexure 32	Date: 17/04/2025
112	Risk Mitigation and Disaster Management	The project management shall ensure to comply with environment protection measure, risk mitigation measure safeguards mentioned in the risk assessment report.	
PPs S	ubmission: Being Complied	1	Date:

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and said	ill ensure to comply with all the environger of the complex and the risk assessment of the	onment protection measure, risk mitigation measures ent report.	17/04/2025
113	Risk Mitigation and Disaster Management	Only flame proof electrical fitting shall be provided i premises.	n the plant
	ubmission: Being Complied ame proof electrical fitting has been pr	rovided in the plant premises.	Date: 17/04/2025
114	Risk Mitigation and Disaster Management	Storage of hazardous chemicals shall be minimized, in multiple small capacity tanks/containers instead of capacity tanks/containers.	
The storon-site.	Instead of using a single large-capacit	inimized by maintaining only the necessary quantities by tank or container, multiple smaller-capacity ial risks. Materials will be procured on an as-needed be safe handling practices.	Date: 17/04/2025
115	Risk Mitigation and Disaster Management	All storage tanks shall be fitted with appropriate contany leakages. Bund/dyke walls shall be provided for st hazardous chemicals.	
All stora walls ar Additio	e constructed around tanks storing haz	te control systems to prevent any leakage. Bunds/dyke zardous chemicals to contain potential spills. mented to prevent static charge accumulation, and al safety compliance.	Date: 17/04/2025
116	Risk Mitigation and Disaster Management	Handling and charging of the chemicals shall be done manner by pumping or by vacuum transfer so that min	
		exposure occurs.	
Handlin	ubmission: Being Complied	ne in closed manner by pumping or by vacuum transfer	Date:
Handlin so that 1	ubmission: Being Complied g and charging of the chemicals is dor	<u> </u>	Date: 17/04/2025
Handlin so that i 117 PPs S Handlin	ubmission: Being Complied ag and charging of the chemicals is dor minimal human exposure occurs.  Risk Mitigation and Disaster Management  ubmission: Being Complied	he in closed manner by pumping or by vacuum transfer  Handling and charging of the chemicals shall be done manner by pumping or by vacuum transfer so that min	Date: 17/04/2025 e in closed imal human Date:
Handlin so that 1  117  PPs S  Handlin so that 1	ubmission: Being Complied ag and charging of the chemicals is dorninimal human exposure occurs.  Risk Mitigation and Disaster Management  ubmission: Being Complied ag and charging of the chemicals is dor	Handling and charging of the chemicals shall be done manner by pumping or by vacuum transfer so that min exposure occurs.	Date: 17/04/2025 e in closed imal human  Date: 17/04/2025
Handlin so that 1  117  PPs S Handlin so that 1  118  PPs S The uni	ubmission: Being Complied ag and charging of the chemicals is dorninimal human exposure occurs.  Risk Mitigation and Disaster Management  ubmission: Being Complied ag and charging of the chemicals is dorninimal human exposure occurs.  Risk Mitigation and Disaster Management  ubmission: Complied t have tied up with the nearby Health of	Handling and charging of the chemicals shall be done manner by pumping or by vacuum transfer so that min exposure occurs.  Tie up shall be done with nearby health care Centre	Date: 17/04/2025 e in closed imal human  Date: 17/04/2025 doctor for ergency.  Date:
Handlin so that in the so that in th	ubmission: Being Complied ag and charging of the chemicals is dorninimal human exposure occurs.  Risk Mitigation and Disaster Management  ubmission: Being Complied ag and charging of the chemicals is dorninimal human exposure occurs.  Risk Mitigation and Disaster Management  ubmission: Complied t have tied up with the nearby Health of	Handling and charging of the chemicals shall be done manner by pumping or by vacuum transfer so that min exposure occurs.  Tie up shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking immediate medical attention in the case of emeants of the chemicals shall be done with nearby health care Centre / seeking medical treatments of the chemicals shall be done with nearby health care centre / seeking medical treatments of the chemicals shall be done with nearby health care centre / seeking medical treatments of the chemicals shall be done with nearby health care centre	Date: 17/04/2025 e in closed imal human  Date: 17/04/2025 doctor for ergency.  Date: 17/04/2025

		health aspects of chemicals handling.	T
First aid applicab monitor	ole antidotes for the chemicals used in	ted locations across the facility. Adequate quantities of the unit are maintained on-site. These are regularly inspections conducted on a monthly basis to ensure	Date: 17/04/2025
121	Human Health Environment	Training shall be imparted to all the workers on safet aspects of chemicals handling.	ty and health
PPs St Regular	ubmission: Being Complied training is imparted to all workers on	safety and health aspect of chemicals handling.	Date: 17/04/2025
122	Human Health Environment	Occupational health surveillance of the workers shall its records shall be maintained. Pre-employment and p examination for all workers shall be undertaken as per Act and Rules.	eriodic medic
Pre-emp	ubmission: Complied ployment and Periodical medical check Act and rules. Annexure-33	k-up is carried out and records is maintained as per	Date: 17/04/2025
123	Statutory compliance	Transportation of hazardous chemicals shall be done provision of the motor vehicle act and rules.	as per the
	ubmission: Being Complied rtation of hazardous chemicals is done	e as per the provision of the motor vehicle act and	Date: 17/04/2025
124	Statutory compliance	The company shall implement all prevention and mit measure suggested in the Risk assessment report.	tigation
The con	ubmission: Being Complied  npany has implemented all recomment  sessment Report to ensure safe operat	ded prevention and mitigation measures outlined in the ions and minimize potential hazards.	Date: 17/04/2025
125	Statutory compliance	Necessary permission from various statutory authoric Factory Inspectorate and others shall be obtained prior commissioning of the project.	
PPs Submission: Complied Necessary permission from various statutory authorities like PESO, Factory Inspectorate and others is obtained prior to commissioning of the project. Annexure 41			Date: 17/04/2025
126	Human Health Environment	Pre-employment and routine periodic medical exami employees shall be undertaken on regular basis.	nations for al
Pre-emp	ubmission: Complied ployment and routine periodic medical basis. See Annexure-33	examinations for all employees are undertaken on	Date: 17/04/2025
127	Risk Mitigation and Disaster Management	Effective safety precaution shall be taken for chemic process handling and transportation hazard.	al storage,
DD <sub>G</sub> C <sub>1</sub>	ubmission: Being Complied	'	Date:

128	Statutory compliance	Comply the statutory provision of safety audit and its report.	compliance
Safety a	ubmission: Complied udit conducted every two year and conducted every two year and conducted compliance report Annexure-39	mpliance report submitted to Factory inspector office.	Date: 17/04/2025
129	Noise Monitoring & Prevention	The overall noise level in and around the plant area s within the prescribe standard by providing noise control including engineering controls like acoustic insulation silencers, enclosures etc. on all sources of noise general ambient noise level shall conform to the standards present including the providing the plant area is within the prescribe standard by providing noise control including noise control	ol measures hood, tion. The
Noise le exposur monitor	e, acoustic enclosures have been instal	rds are systematically maintained. To minimize noise led around high-noise equipment. For detailed includes reports from the NABL-accredited	Date: 17/04/2025
130	Statutory compliance	The unit shall undertake the cleaner production asses through a reputed institute/organization and shall form the company. The recommendation thereof along with compliance shall be furnished to the GPCB.	a CP team in
The ade Enginee	ring College, Ahmedabad. Recommer	(ETP) is evaluated annually by the LJ Institute of adations provided in the evaluation are implemented to efficiency. Refer to Annexure-16 for detailed reports.	Date: 17/04/2025
131	Human Health Environment	The company shall undertake various waste minimize such as a. Metering and control of quantities of active in minimize waste. b. Reuse of by-products from the process materials or as raw material substitute. c. Use of autom filling to minimize spillage. d. Use of close feed system reactor. e. Venting equipment through vapour recovery of high-pressure hoses for cleaning to reduce wastewate g. Recycling of washes to subsequent batches. h. Recyclondensate. i. Sweeping/mopping of floor instead of floavoid effluent generation. j. Regular preventive mainter avoiding leakages, spillages etc.	ingredients to cess as raw lated and close in into batch system. f. User generation cling of stear oor washing
a. We he processed through Double have use being ut a PPPU	es to minimize waste. b. Not applicable close loop system to avoid spillage. d. condenser with cooling and chilling system high pressure hose and pumps for chilized until it reaches poor quality. h. V pump for the vapor condensate recover	nce as required for all active ingredient manufacturing e.c. follow strict instructions for material charging. Close feed system is being used into batch reactor. e. ystem installed for to recover maximum vapour. f. We leaning to reduce wastewater generation. g. Washes is We recycle steam condensate water and have installed ery system. i. We sweep and mop the floors instead of We have prepared a preventive maintenance schedule ages, and other issues.	Date: 17/04/2025
	talendar year to prevent leakages, spin	,	

		reactor. e. Venting equipment through vapour recovery of high-pressure hoses for cleaning to reduce wasteward g. Recycling of washes to subsequent batches. h. Recycondensate. i. Sweeping/mopping of floor instead of fl avoid effluent generation. j. Regular preventive mainter avoiding leakages, spillages etc.	er generation cling of steam oor washing t
a. We he process through Double have us being us a PPPU washing	es to minimize waste. b. Not applicable close loop system to avoid spillage. condenser with cooling and chilling sed high pressure hose and pumps for chilized until it reaches poor quality. h. pump for the vapor condensate recover.	ance as required for all active ingredient manufacturing le c. follow strict instructions for material charging d. Close feed system is being used into batch reactor. e. system installed for to recover maximum vapour. f. We cleaning to reduce wastewater generation. g. Washes is We recycle steam condensate water and have installed there system. i. We sweep and mop the floors instead of We have prepared a preventive maintenance schedule lages, and other issues.	Date: 17/04/2025
133	Risk Mitigation and Disaster Management	Effective step shall be taken for prevention of fire, extoxic release.	xplosion and
On site	Submission: Complied emergency plan is prepared and imple See Annexure-31B	emented for prevention of fire, explosion and Toxic	Date: 17/04/2025
134	GREENBELT	The PP shall develop green belt (24153 Sq. m (36 percent) of total plot area) as committed before SEAC. Green belt shall be developed with native plant species that are significant and used for the pollution abetment as per CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.	
Our uni	<b>Submission:</b> Being Complied thas developed the greenbelt in 2415: maining trees.	3 square meter area with 1012 Trees. We will shortly	Date: 17/04/2025
135	Statutory compliance  Unit shall comply all the practicable standard condition prescrib in office Memorandum (OM) published by MoEF and CC vide no No. 22-34/2018-IA.III dated 09/08/2018 for pharmaceutical and chemical industries mentioned at (Sr. no. XX)		CC vide no. l
	Submission: Being Complied I follow this strictly.		Date: 17/04/2025
136	Statutory compliance	The provision of the solid waste Management rules, (Management) rules, 2016, the construction and demol management rules, 2016 and the Plastics waste management shall be followed.	ition waste
	PPs Submission: Being Complied We will follow this strictly.		Date:
			17/04/2025
		Rainwater harvesting (off site) shall be undertaken to fresh water as well as recharge ground water. Before resurface runoff, pre-treatment must be done to remove smatter. (applicable for units consuming ground water gequal to 50 KLD in line with the prevailing guidelines	echarging the suspended greater than or

			17/04/2025
138	Corporate Environmental Responsibility	Unit shall join and participate financially and technic common environmental facility/infrastructure as and w is taken up either by the industrial association or GIDC any such authority created for this purpose by the Gov	then the same or GPCB or
Our uni		and technically for any common environmental s taken up either by the industrial association or GIDC is purpose by the Govt. /GIDC.	Date: 17/04/2025
139	ENERGY PRESERVATION MEASURES	Application of solar energy shall be incorporated for common areas, lighting for gardens and street lighting provision for solar water heating system shall also be provision.	in addition th
Applica		ated for illumination of common areas, lighting for ovision for solar water heating system will be provided.	Date: 17/04/2025
140	GREENBELT	The area ear marked as green area shall be used only and shall not be altered for any purpose.	for plantatio
	Submission: Being Complied I follow this strictly.		Date: 17/04/2025
141	Statutory compliance	All the commitments/ undertaken given to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.	
	Submission: Being Complied I follow this strictly.		Date: 17/04/2025
142	Statutory compliance	The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose for the environment protection and management.	
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025	
	l follow this strictly.		
	Risk Mitigation and Disaster Management	In the event of failure of any pollution control system the unit, the unit shall be safely closed down and shall until the desired efficiency of the control equipment has achieved.	not be restart
We wil	Risk Mitigation and Disaster	the unit, the unit shall be safely closed down and shall until the desired efficiency of the control equipment has	not be restart as been Date:
We wil	Risk Mitigation and Disaster Management  Submission: Being Complied	the unit, the unit shall be safely closed down and shall until the desired efficiency of the control equipment has	Date: 17/04/2025

145	WASTE MANAGEMENT	During material transfer there shall be no spillage and shall be constructed to avoid mixing of accidental spill domestic wastewater or storm water.	
Material prevention place	ve maintenance schedule is followed	nder strict monitoring to prevent any spillage. A diligently to ensure equipment reliability. Measures are mixing with domestic wastewater or storm water risk.	Date: 17/04/2025
146	WASTE MANAGEMENT	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	
Pucca flo	abmission: Being Complied coring / impervious layer is provided areas to minimize soil contamination	l in the work areas, chemical storage areas and chemical n.	Date: 17/04/2025
147	WASTE MANAGEMENT	Leakages from pipes, pumps shall be minimal and if occur, shall arrested promptly.	
	1 1 0	Double mechanical seal pump is provided to prevent	Date: 17/04/2025
148	Statutory compliance	No further expansion or modification in the plant likely to cause environmental impacts shall be carried out without obtaining prior environment clearance from the concerned authority.	
	<b>abmission:</b> Being Complied follow this strictly.		Date: 17/04/2025
149	Statutory compliance	The above condition will enforced, inter-alia under the provision of the water Prevention and Control of Pollution) Act, 1974, Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous wastes (management, handling a transboundary Movement) rules, 2008 and the Public liability Insurance Act, 1991 along with their amendment and rules.	
	<b>abmission:</b> Being Complied follow this strictly.		Date: 17/04/2025
150	Statutory compliance	The project proponent shall comply all the condition mentioned in The Companies (corporate social responsibility policy) rules, 2014 and its amendments from time to time in a spirit.	
The proj		ndition mentioned in The Companies (corporate social andments from time to time in a spirit.	Date: 17/04/2025
151	Human Health Environment	The project management shall ensure that unit complete environment protection measure, risk mitigation measure safeguards recommended in the EMP report and Risk a study report as well as proposed by project proponent.	ires, and
We will		l environmental protection measures, risk mitigation ne EMP report and Risk Assessment study, as well as	Date: 17/04/2025

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152	Statutory compliance  The project authority shall earmark adequate funds to implement the condition stipulated by SEIAA as well as GPCB along with the implementation schedule for all the condition stipulated herein. The funds so provided shall not diverted for any other purpose.		ong with the d herein. The
Adequa along w	ubmission: Being Complied te funds are earmarked to implementation schedule to will not diverted for any other parts.	nent the condition stipulated by SEIAA as well as GPCB for all the condition stipulated herein. The funds so purpose.	Date: 17/04/202:
153	Statutory compliance	The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the cop of the clearance letter are available with the GPCB and may also seen at the website of SEIAA/SEAC/GPCB. This shall be adverti within seven days from the date of the clearance letter, in at least local newspapers that are widely circulated in the region, one of which shall be in Guajarati language and the other in English. A ceach of the same shall be forwarded to the concerned regional off of the ministry.	
Adverti: Standar		paper Gujarat Samachar on 21/07/2021 and Business ys from the date of issue of EC. Copy of newspaper cutting	Date: 17/04/202
154	Statutory compliance	It shall be mandatory for the project management to submit half yearly compliance report in respect of the stipulated prior environmental clearance terms and condition in a soft copy to the regulatory authority concerned, on 1st June and 1st December of e calendar year.	
We are	ubmission: Being Complied submitting half yearly compliance terms and conditions in soft co	e reports in respect of the stipulated prior environment pies to the IRO Office.	Date: 17/04/202
155	Statutory compliance  Concealing factual data or submission of false/fabricated data a failure to comply with any condition mentioned above may result withdrawal of this clearance and attract action under the provision environment (Protection) Act, 1986.		may result i
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/202	
156	Statutory compliance	The project authority shall also be adhere to the stipulation made the Gujarat pollution control board.	
	<b>ubmission:</b> Being Complied follow this strictly.		Date: 17/04/202
157	Statutory compliance	The SEIAA may revoke or suspend the clearance, if implementation of any of the above condition is not fo satisfactory.	und
	1	<u> </u>	

mission: Being Complied flow this strictly.  Statutory compliance	The project authority shall inform the GPCB, region MoEF and SEIAA about the date of financial closure approval of the project by the concerned authorities ar start of the project.	and final
	MoEF and SEIAA about the date of financial closure approval of the project by the concerned authorities ar	and final
mission: Being Complied llow this strictly.		Date: 17/04/2025
Statutory compliance	This environment clearance is valid for seven years issue.	from the date
mission: Being Complied llow this strictly.		Date: 17/04/2025
Statutory compliance	Any appeal against this environmental clearance shall lie with the national green tribunal, if preferred, within a period of 30 days as prescribed under section 16 of the national green tribunal act, 2010	
mission: Being Complied llow this strictly.		Date: 17/04/2025
Statutory compliance	Submission of any false or misleading information or data which is material to screening or scooping or appraisal or decision on the application makes this environmental clearance cancelled.	
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
r	mission: Being Complied low this strictly.  Statutory compliance mission: Being Complied low this strictly.  Statutory compliance mission: Being Complied	mission: Being Complied low this strictly.  Any appeal against this environmental clearance sha national green tribunal, if preferred, within a period of prescribed under section 16 of the national green tribunal low this strictly.  Submission of any false or misleading information of material to screening or scooping or appraisal or decis application makes this environmental clearance cancer mission: Being Complied

## **Visit Remarks**

Last Site Visit Report Date:	N/A
Additional Remarks:	i am submitting herewith EC (Environment Compliance) compliance report from M/s. Raks Pharma Private Limited.

**Note:** This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.