

GACL/S&E/D-16/19

Dtd. 22.05.2020

Member Secretary,  
State Level Environment Impact Assessment Authority  
Gujarat Pollution Control Board  
Paryavaran Bhavan,  
Sector -10 A,  
Gandhinagar - 382 010.

Sub: Half yearly Compliance Report under specific condition of Environment Clearance

Ref: EC no. SEIAA/GUJ/EC/4(d) & 5 (f)/87/2011 dated 30.05.2011 granted by SEIAA.

With the above reference on the subject cited, we are submitting half yearly compliance report with respect to stipulated prior EC terms and conditions.

Thanking you,

For Gujarat Alkalies and Chemicals Ltd.,

Sd/-

(NR Bhargava)  
DGM (TS & Mech.) / I/c (S, E, Fire, Sec & Civil)

**Compliance of Specific and General Conditions of Environment Clearance no. SEIAA/GUJ/EC/4(d) & 5 (f)/87/2011 dated 30.05.2011 granted by SEIAA**

**A - Specific Conditions**

**A.-1 WATER**

Sr. No.	Specific Conditions	Compliance
1.	No ground water shall be used for the project. Entire Water requirement of 6168 KLD after the proposed expansion shall be met through the own joint water supply scheme with GIPCL. No new borewell shall be dug within the premises as per the undertaking dated 22.06.2010 submitted by the company.	Complied. Water requirement is met from existing source only. No new borewell is dug.
2.	The industrial effluent generation from salt washery unit shall not exceed from existing 30 KLD due to proposed expansion and it shall be disposed into estuary of river mahi as per consent given by GPCB	Complied.
3.	The other industrial effluent generation (except from salt washery unit) shall reduce from existing 2400 KLD to 2160 KLD after the proposed expansion due to recycle / reuse of effluent	Complied. The industrial effluent generation is reduced to less than 2160 KLD by way of reuse and recycling of water and wastewater.
4.	Various measures shall be implemented as proposed for reducing the industrial effluent generation viz recycling of cooling water from air compressor and vacuum pump, reuse of steam condensate water for brine and preparation of chemicals, reuse of alkaline wastewater from hydrogen gas area in HCl absorption tower, reuse of alkaline effluent from Caustic concentration unit in neutralization of acidic effluent of DM plant.	Complied. All the measures are implemented and due to which our industrial effluent load has reduced to less than 2160 KLD.
5.	The industrial effluent shall be treated in existing ETP. ETP shall be operated regularly and efficiently so as to achieve the GPCB norms at the ETP outlet.	Complied.
6.	The treated wastewater conforming to GPCB norms shall be discharged into ECP channel for its final disposal into estuary of river mahi	Complied.
7.	The unit shall provide online system for monitoring of treated effluent quantity and quality, with an arrangement for reflecting the same on company's server, which can be assessed by GPCB on real time basis.	Complied.
8.	The domestic wastewater generation shall not exceed from existing 280 KLD due to proposed expansion.	Complied.
9.	Proper logbooks of ETP operation and also showing the quantity of effluent generated, discharged into ECP channel, utilized for plantation/gardening, reused/recycled etc. shall be maintained and furnished to GPCB from time to time.	Complied. The data of effluent quantity discharged to VECL is maintained and time to time submitted to GPCB on regular basis.

10.	Regular performance evaluation of ETP shall be undertaken every year to check its adequacy through credible institutes like LD college of Engg, NPC or such other institute of similar repute and its records shall be maintained.	Complied. Regular performance evaluation of ETP is carried out once every year through GPCB approved Schedule I Env. Auditor.
11	Rain water harvesting of surface as well as of rooftop runoff shall be undertaken and the same water shall be used for various activities of the project to conserve fresh water as well as to recharge ground water. Before recharging the surface runoff, pretreatment must be done to remove suspended matters.	Complied. Company has developed recharge bore well at its own solid waste landfill site. The recharged water is used for watering the plants.
12	The unit shall join and participate financially and technically for any common environmental facility / infrastructure as and when the same is taken up either by the GIDC or GPCB or any such authority created for this purpose by Govt./GIDC	Noted

#### A-2 AIR

Sr. No.	Specific Conditions	Compliance
13	No additional boilers shall be installed for the proposed expansion and the existing four boilers shall cater to increased steam requirement for the proposed expansion.	Complied. No additional boilers are installed.
14	Natural gas shall be used as fuel in boilers and its consumption shall increase from existing 2607 SM3/hr to 3027 SM3/hr. after proposed expansion.	Complied. Only Natural gas is used in all the boilers.
15	HSD shall be used as fuel in DG sets (625 KVA x 3 no.) and adequate stack ht. as per prevailing norms shall be provided.	HSD is used as fuel in DG sets. Adequate stack height is provided.
16	No additional process vents shall be provided for the proposed expansion. The existing air pollution control equipments shall be operated efficiently and effectively to achieve norms prescribed by GPCB at stack outlets	Complied. No additional process vents are provided.
17	Online monitoring system shall be installed at the process vents of Hypo tower – Caustic Soda plant and Chloromethanes plant for monitoring of HCl and Cl <sub>2</sub> parameters. Arrangement shall be made for reflecting the monitored values on the company's server, which can be assessed by GPCB on real time basis.	Complied.
18	The company shall prepare schedule, carry regular preventive maintenance of air pollution control equipments and assign responsibility of preventive maintenance to the senior officer of the company.	Complied. Regular preventive maintenance of air pollution control equipments is carried out.
19	The fugitive emission in work zone environment shall be monitored. The emission shall conform to the standards prescribed by concerned authority from time to time.	Complied. Fugitive emission is monitored and records maintained in form 37.

20	Regular performance evaluation of air pollution control systems shall be undertaken every year to check its adequacy through credible institutes like LD college of Engg, NPC or such other institute of similar repute and its records shall be maintained	Complied.
21	Regular monitoring of ground level concentrations of SO <sub>2</sub> , NO <sub>x</sub> , Cl <sub>2</sub> , HCl, PM 10 & PM 2.5 shall be carried out in impact zone and its record shall be maintained. Ambient air quality shall not exceed the standards stipulated by GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be undertaken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.	Complied. Regular monitoring of ambient air parameters like NO <sub>x</sub> , SO <sub>2</sub> , HCl, Cl <sub>2</sub> , PM 10 & PM 2.5 is carried out.

### A-3 HAZARDOUS/SOLID WASTE

Sr. No.	Specific Conditions	Compliance
22	The company must strictly comply with the rules and regulations with regards to handing and disposal of hazardous waste in accordance with the Hazardous waste Rules 2008 as may be amended from time to time. Authorization from GPCB must be obtained for collection/storage/treatment/disposal of hazardous waste.	Complied. We have obtained CC&A for our Caustic Soda Unit no. AWH 101053 valid upto 31.12.2023 for collection, storage, treatment and disposal of hazardous waste.
23	The hazardous waste shall be stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility before its disposal.	Complied. Designated storage facilities are provided for each waste having impervious bottom.
24	Salt washery and brine purification sludge, ETP sludge, incineration ash and used heating salt shall be disposed in company's own TSDF.	Complied
25	Organic waste from H <sub>2</sub> O <sub>2</sub> plant shall be incinerated in the company's inhouse incinerator.	Organic waste from H <sub>2</sub> O <sub>2</sub> plant is incinerated at CHWI facility as per CC&A issued by GPCB.
26	High boilers shall be incinerated in the company's in house incinerator or sent to common hazardous waste incinerator facility of BEIL, Ankleshwar	Hi Boilers is incinerated at CHWI facility as per CC&A issued by GPCB.
27	Discarded containers / barrels/ bags/liner shall be either reused or sold only to authorized recyclers after decontamination.	Complied.

28	Used oil, discarded lead acid batteries, lead acid battery plates and other lead scrap and insulated copper wire scrap/copper with PVC sheathing shall be sold only to registered reprocessors.	Complied.
29	The company shall provide additional ground water monitoring wells (three well clusters) around the captive TSDF as per the "Criteria of Hazardous Waste landfills" published by CPCB. Quality of ground water in saturated zone beneath and around the landfills as well as other parameters like leachate quality, air quality etc. shall be monitored regularly as per the "Criteria of Hazardous Waste landfills" published by CPCB	Complied. We have provided ground water monitoring wells. Quality of water in borewells and leachate well and ambient air quality is monitored/checked on regular basis.

#### A-4 SAFETY

Sr. No.	Specific Conditions	Compliance
30	The unit shall obtain requisite permission from PESO, nagpur for storage of chlorine, hydrogen etc. before commissioning of expansion project.	Complied.
31	Provision of Manufacture, Storage and Import of hazardous chemicals rules 1986 and The Factories Act 1948 shall be strictly complied with.	Complied
32	All the risk mitigation measures / recommendations mentioned in Quantitative risk assessment report shall be implemented.	Complied.
33	All the necessary precautions measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals, especially Cl <sub>2</sub> & H <sub>2</sub>	Complied
34	Storage and use of hazardous chemicals shall be minimized to the extend possible and all necessary precautions shall be taken to mitigate the risk generated out of it. Storage of hazardous chemicals shall be in multiple small capacity tanks/containers instead of one single large capacity tank for safety purpose.	Complied
35	All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/Dyke walls shall be provided for storage tanks for hazardous chemicals. Close handling system for chemicals shall be provided.	Complied
36	Tie up shall be done with nearby health care unit for seeking immediate medical attention in case of emergency, regular medical check up of the workers and keeping its record etc.	Complied. We have our own OHC and also have tie up with competent health care units. Medical check up of all the workers is carried out once in every six months.
37	Personal Protective Equipment shall be provided to workers and its usage shall be ensured and supervised.	Complied
38	First aid box and required antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	Complied

39	Training shall be given to all workers on safety and health aspects of handling chemicals.	Complied
40	Occupational health surveillance of the workers shall be done and records shall be maintained. Pre-employment and periodical medical examination for all workers shall be undertaken as per Factories Act & Rules	Complied
41	Handling and charging of chemicals shall be done in such a manner that the minimal human exposure occurs	Complied
42	Transportation of hazardous chemicals shall be done as per the provisions of Motor Vehicle Act and Rules	Complied

#### A-5 NOISE

Sr. No.	Specific Conditions	Compliance
43	<p>To minimize the noise pollution the following noise control measures shall be implemented :</p> <ul style="list-style-type: none"> <li>● Selection of any new plant equipment shall be made with specifications of low noise levels</li> <li>● Manufacturers/suppliers of major noise generating machines / equipments like air compressors, feeder pumps, turbine generators etc. shall be instructed to make required design modifications wherever possible before supply and installation to mitigate the noise generation and to comply with national/international regulatory norms with respect to noise generation for individual units <ul style="list-style-type: none"> <li>● Regular maintenance of machinery and vehicles shall be undertaken to reduce noise impact</li> <li>● Noise suppression measures such as enclosures, buffers and /or protective measures shall be provided</li> <li>● Employees shall be provided with ear protection measures like ear muff or ear plug.</li> <li>● Proper oiling, lubrications and preventive maintenance shall be carried out of the machineries and equipments to reduce noise generation</li> <li>● Construction equipments generating minimum noise and vibration shall be chosen.</li> <li>● Ear plugs and muffs shall be made compulsory for the construction workers working near the noise generating activities/machines /equipments</li> <li>● Vehicles and construction equipment with internal combustion engines without proper silencer shall not be allowed to operate</li> <li>● Construction equipment meeting the norms specified by EP act 1986 shall be used</li> <li>● Noise control equipment and baffling shall be employed on generators especially when they are operated near the residential and sensitive areas.</li> <li>● Noise levels shall be reduced by the use of adequate mufflers on all motorized equipment.</li> </ul> </li> </ul>	<p>Complied. We have taken preventive measures to reduce noise generation wherever possible. Regular preventive maintenance of all the equipments/machineries is carried out. We have provided ear plugs and ear muffs wherever required. We meet with the norms of noise level in work place as per Gujarat Factories rules and ambient noise as per Noise pollution rules. The noise monitoring is carried out on regular basis and records maintained.</p>

44	The overall noise level in and around the plant area shall be well within the prescribed standards by providing noise control measures including acoustic insulation, hoods, silencers, enclosures vibration dampers etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act and Rules. Workplace noise levels for workers shall be as per the Factories Act and Rules.	Complied. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act and Rules. Workplace noise levels for workers are as per the Factories Act and Rules.
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## A-6 ENERGY CONSERVATION

Sr. No.	Specific Conditions	Compliance
45	The project proponent shall install energy efficient devices and appliances conforming to the Bureau of Energy Efficiency norms	Complied
46	The energy audit shall be conducted at regular intervals and recommendations of the audit report shall be implemented	Complied
47	The project proponent shall implement the application of solar energy which shall be utilized as solar lighting for illumination of common areas, lighting of internal roads and passages in addition to utilisation of solar water heating systems	We have installed 35 MW solar power plant
48	The transformers and motors shall have minimum efficiency of 85 %.	Complied
49	Variable frequency drives shall be installed	Complied. We have installed VFD in many types of equipment to conserve power.
50	Energy conservation measures shall include use of electronic lighting system, use of CFL tubes to minimize energy use, use of programmable times for pumping system and lighting, water level controllers for water pumps, centralized cooling etc.	Complied. We have installed CFL tubes, centralized cooling, electronic ballast, and installed VFDs etc to save energy.
51	Energy saving practices as follows shall be practiced : <ul style="list-style-type: none"> <li>● Constant monitoring of energy consumption and defining targets for energy conservation</li> <li>● Adjusting the settings and illumination levels to ensure minimum energy used for desired comfort level</li> <li>● Use of solar cells for lighting</li> <li>● Use of solar water heater for canteen and washing area</li> <li>● Proper load factor shall be maintained</li> <li>● Provision of day light roof to maximize natural light in the production plant instead of electrical lighting</li> <li>● Use of electronic ballast to save energy</li> <li>● Automatic switching system for lighting and water tank</li> </ul>	Complied. Following are out energy saving practices : <ul style="list-style-type: none"> <li>● Constant monitoring of energy consumption.</li> <li>● Adjusting the settings of illumination</li> <li>● Use of solar cells for lighting</li> <li>● Proper load factor is maintained</li> <li>● Use of electronic ballast</li> </ul>

	<p>pumping shall be used.</p> <ul style="list-style-type: none"> <li>● To the maximum extent possible and technically feasible, energy efficient motors, pumps, air conditioning systems shall be selected.</li> <li>● Gravity flow shall be preferred wherever possible to save pumping energy. Promoting awareness on energy conservation</li> <li>● Training to the staff on methods of energy conservation and to be vigilant for this</li> </ul>	<ul style="list-style-type: none"> <li>● Energy efficient equipment like motors</li> <li>● Training to employees etc.</li> </ul>
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#### A-6 CLEANER PRODUCTION AND WASTE MINIMISATION

Sr. No.	Specific Conditions	Compliance
52	<p>The unit shall undertake the Cleaner Production Assessment study through a reputed institute / organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to GPCB</p>	Complied.
53	<p>The company shall undertake following waste minimization measures :</p> <ul style="list-style-type: none"> <li>● Metering and control of quantities of active ingredients to minimize waste</li> <li>● Reuse of byproducts from the process as raw materials or raw materials substitutes in other process</li> <li>● Use of automated and enclosed filling to minimize spillages</li> <li>● Use of close feed system into batch reactors</li> <li>● dry cleaning /mopping of floor instead of floor washing</li> <li>● Use of high pressure hoses for cleaning to reduce wastewater generation</li> <li>● Regular preventive maintenance for avoiding leakage, spillage etc.</li> </ul>	Complied.

#### A-7 GREEN BELT AND OTHER PLANTATION

Sr. No.	Specific Conditions	Compliance
54	<p>Company shall maintain greenbelt 126000 sq.m area within premises. In addition to that the unit shall take up adequate plantation near Jawaharnagar Police station PCC area-1000 M2, Company's landfill site near village Dhanora – 7500 M2, Joint water supply scheme near village Angadh – 4500 M2, nearby villages and schools – 4000 M2 as per details presented before SEAC, Gujarat</p>	Complied.
55	<p>Drip irrigation /low volume, low angle sprinkler system shall be used for green belt development within premises.</p>	Complied

## B. GENERAL CONDITIONS

56	In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.	Noted
57	The company shall strictly follow all the recommendations mentioned the charter on corporate responsibility for Environment Protection (CREP) published by CPCB as may be applicable	Complied.
58	A separate Environment management cell equipped with full fledged laboratory facilities and qualified personnel shall be set up to carry out Environment management and monitoring functions and a separate budget shall be allocated for this purpose	Complied
59	The funds earmarked for environmental protection measures shall be maintained in a separate account and there shall not be any diversion of these funds for any other purpose. A year wise expenditure on environmental safeguards shall be reported	Complied. The funds provided for environmental protection/monitoring and expenditure is reported to GPCB.
60	During material transfer, spillage shall be avoided and garland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water	Complied. The spillage of material is does not mix with domestic or storm water but is directed to ETP for treatment.
61	Pucca flooring/impervious layer shall be provided in the work areas, chemicals storage areas and chemical handling areas to minimize soil contamination.	Complied. Impervious layer provided at chemical warehouses and handling area.
62	Leakages from pumps, pipes shall be minimal and if occurs shall be arrested promptly.	Complied
63	All the recommendations made in EIA report submitted by the proponent shall be strictly implemented	Complied.
64	The company shall carry out socio economic developmental/community welfare activities in consultation with District Development officer / District collector	Complied.
65	The applicant shall also comply with any additional condition that may be imposed by SEAC or SEIAA or any other competent authority for the purpose of environmental protection and management	Noted
66	No further expansions or modifications in the plant shall be carried out without prior approval of the MoEF/SEIAA, as the case may be. In case of deviations or alterations in the project proposal from those submitted to MoEF/SEIAA/SEAC for clearance, a fresh reference shall be made to SEIAA/SEAC to access the adequacy of conditions imposed and to add additional environmental protection measures required if any	Noted
67	The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA or GPCB	Complied.

	along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	
68	The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and the copies of the clearance letter are available with GPCB and may also be send at website of SEIAA/SEAC/GPCB. This shall be advertised within seven days from the date of clearance letter, in at least two local news paper that are widely circulated in the region one of which shall be in Gujarati language and other in English. A copy each of the same shall be forwarded to the concerned regional office of the ministry.	Complied
69	It shall be mandatory for the project management to submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in hard and soft copies to the regulatory authority concerned, on 1 <sup>st</sup> June and 1 <sup>st</sup> December of each calendar year.	Complied
70	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	Complied
71	The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Complied
72	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	--
73	The above conditions shall be enforced inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, The Environment (Protection) Act 1986, Hazardous Wastes (Management Handling and Transboundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 alongwith their amendments and rules.	Complied
74	This environmental clearance is valid for five years from the date of issue	--