



# Gujarat Alkalies and Chemicals Limited

(Promoted by Govt. of Gujarat)

Dahej Complex : P.O. Dahej - 392130. Tal. Vagra, Dist. Bharuch (Gujarat) INDIA

Phone : +91-2641- 613200

CIN NO : L24110GJ1973PLC002247

ENV/2024-25/D-III/E-28/VK/02

24<sup>th</sup> December, 2024

To,  
Ministry of Environment, Forest and Climate Change,  
Integrated Regional Office-Gandhi Nagar,  
A-Wing – 407 & 409, Aranya Bhawan,  
Near CH-3 Circle, Sector-10A,  
Gandhinagar – 382010

**Sub: Submission of half yearly compliance report of EC for the period of April-2024 to September-2024.**

**Ref.: EC issued vide letter no. SEIAA/GUJ/EC/7(d)/482/2020 Dated 05/06/2020.**

Dear Sir,

With reference to above, we are enclosing herewith six-monthly compliance report of above ECs for the period of April-2024 to September-2024.

Thanking you,  
Yours faithfully,

**For Gujarat Alkalies and Chemicals Limited-Dahej**

*S. N. Patel*  
24/12/2024

**S. N. PATEL**  
**DGM (S, E & F)**

Encl: As Above





Regd. Office & Works : P.O. Petrochemicals - 391 346, Dist. Vadodara(Gujarat) INDIA

Phone : +91-265-6111000-7119000


Website : www.gacl.com

<b>GUJARAT ALKALIES AND CHEMICALS LIMITED Plot D- III/3, Dahej</b>		
<b>Status of Six-Monthly compliance of the stipulated conditions of the Environment Clearance no SEIAA/GUJ/EC/7(d)/482/2020 dated 5<sup>th</sup> June 2020 for the period: 1<sup>st</sup> April 2024 to 30<sup>th</sup> September 2024.</b>		
<b>Sr No.</b>	<b>EC conditions</b>	<b>Compliance Status</b>
<b>A.1. SPECIFIC CONDITIONS:</b>		
1.	Unit shall no carry out any activity in the matter pertaining of M. A. No. 553/2018 with Appeal No. 02 of 2018 (WZ); Brackish Water Research Center Vs. Gujarat State Environment Impact Assessment Authority & Ors.	<p><b>Complied.</b></p> <p>This unit does not carry out any activity in the matter pertaining of M. A. No. 553/2018 with Appeal No. 02 of 2018 (WZ); Brackish Water Research Centre Vs. Gujarat State Environment Impact Assessment Authority &amp; Ors.</p> <p>The said matter pertains to exclusively for plot no. 3 of GACL-Dahej which is a separate facility and the aforementioned matter is not applicable to this facility.</p>
2.	This TSDF site shall be used only for the purpose of disposal of new sludge to be generated in future at the plants belonging to GACL and its subsidiary company in Dahej Industrial area.	<p><b>Complied.</b></p> <p>Only new sludge generated from GACL Dahej complex only is disposed.</p>
3.	Project proponent shall start project activity only after obtaining the Notification of proposed site as per the Hazardous and Other wastes (Management and Transboundary Movement) Rules 2016.	<p><b>Complied.</b></p> <p>The said project is captive SLF site and it is located within the notified GIDC industrial estate of Dahej.</p>
4.	Project proponent shall have to provide a laboratory capable of finger printing analysis, mechanized operation of transportation and handling of wastes with trained manpower at Site.	<p><b>Complied.</b></p> <p>Currently, following wastes are being disposed at this captive SLF site.</p> <ol style="list-style-type: none"> <li>1. GACL Plot-3- Phosphoric Acid Plant chemical sludge primarily inorganic in nature, neutral and stabilized.</li> <li>2. GACL Plot-3- non-hazardous caustic brine sludge.</li> <li>3. GACL Plot-3- Insulation waste.</li> </ol> <p>Analysis of these sludge are being carried out at GACL established QC laboratory.</p>

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		<p>These sludges are being transported via dedicated GPS mounted vehicle (Mostly Hywa) covered with tarpaulin. Contract is awarded for this requirement.</p> <div style="display: flex; justify-content: space-around;">   </div> <p>Sample photograph of vehicle are appended as below.</p> <p>Manual handling of waste is eliminated/minimised to the extent possible by way of following mechanized measures and wherever manual intervention is required, it will be arranged through trained manpower.</p> <ol style="list-style-type: none"> <li>1. Hywa with hydraulic mechanism are engaged for transporting waste.</li> <li>2. Poclain is permanently mobilized for unloading waste from Hywa at SLF site.</li> </ol>
5	Adequate number of vents shall be installed during post closure period of the cell & monitoring program for emission of vent gases shall be prepared & records shall be maintained.	<p><b>Complied.</b></p> <p>At this site neutral, stabilized and primarily inorganic in nature type sludge is being disposed. However, we will install adequate number of vents as per design document during closure period of the cell &amp; monitoring program for emission of vent gases shall be prepared &amp; records shall be maintained.</p> <p>Design of SLF pit is endorsed by GITCO-Ahmedabad, who is GPCB authorised schedule-I auditor as well as renowned technical consultant in environment management programme. The document also covers post-closure requirements.</p>
6	Ground water table at the project site shall be ascertained through the GWRDC (Gujarat	<b>Complied.</b>

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	Water Resources Development Corporation) before initiating construction of secured landfill site. The depth of the secured land fill site shall be decided based on the ground water level at the site and bottom of the secured landfill site shall be kept at least 2 m above the ground water table.	Ground water table study was carried out at initial stage of establishment of SLF by KCT consultancy services, who is having NABL accreditation and is a state and central level approved agency for geotechnical investigation.  Ground water table is at 7-8 meter below from the surface level and the same was ascertained by GITCO.
7	Construction of the secured landfill site shall be undertaken meticulously keeping in view the existing natural drainage pattern of the site to ensure that the natural drainage is not affected. All construction designs/drawings relating to the proposed landfill site must have approvals of reputed institutes like NPC / IIT.	<b>Compiled.</b>  Technical design basis relating to the secured landfill site has been reviewed and approved by reputed institute GITCO Ahmedabad, who is GPCB authorised schedule-I auditor as well as renowned technical consultant in environment management programme.
8	The proponent shall ensure that design and construction of secured landfill site is as per the guidelines of CPCB with proper leachate collection arrangement.	<b>Compiled.</b>  Design and construction of SLF site is in accordance with the guidelines of CPCB with proper leachate collection arrangement.
9	Project proponent shall have to strictly adhere to and comply with the Guidelines / Manuals published by the different authorities for Construction and safe operation of the Hazardous Waste TSDF sites like (a) Criteria for Landfills (b) Manual for design, construction and quality control of liners and covers of Hazardous Waste Landfills (c) Guideline for proper functioning and upkeep of disposal site (d) Guideline for transportation of Hazardous Waste (e) Guideline for setting up of operating facility along with the instruction and stipulation issued time to time for the safe handling, construction and operating of Hazardous Waste TSDF Sites.	<b>Noted and complying with the requirement.</b>  Relevant guidelines/manuals published by the different authorities for construction and safe operation for SLF site have been followed.
10	Project proponent shall have to follow the Guideline for Transportation, Storage, Handling and Labelling of Hazardous Waste published by CPCB.	<b>Noted and complying with the requirement.</b>  GACL has been following the guidelines related to Transportation, Storage, Handling and Labelling of


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		<p>Hazardous Waste published by CPCB. As an illustration.</p> <ol style="list-style-type: none"> <li>1. Dedicated vehicle mounted with GPS and having colour coding are hired for transportation of the waste.</li> <li>2. Mechanised handling of the waste is ensured to the extent possible and wherever manual intervention is required; it is being ensured through trained manpower.</li> <li>3. Transportation of waste is done in covered condition.</li> </ol>
11	The proponent shall ensure that the transportation of the Hazardous wastes to the TSDF conforms to the norms laid down in the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.	<p><b>Noted and complying with the requirement.</b></p> <p>GACL conforms to the norms laid down for the transportation of the hazardous wastes to the SLF. e.g, transportation of waste through GPS mounted dedicated and vehicle accompanied with form no. 9 Trem card.</p>
12	Project proponent shall ensure that wastes with organic content > 5% of degradable organic matters are not disposed in to the landfill. However, required arrangement for collection, treatment and disposal of gases from the secured landfill, if any, shall be provided.	<p><b>Complied.</b></p> <p>At this SLF site, wastes generated from GACL Dahej complex are being disposed. The basic characteristic of the waste is primarily inorganic type chemical sludge and non-hazardous brine sludge. The waste is neutral and stabilized.</p>
13	The project proponent shall set up necessary facility for on-site testing of wastes to decide the requirement of treatment if any, before disposal.	<p><b>Noted for Compliance.</b></p> <p>Currently, following wastes are being disposed at this captive SLF site.</p> <ol style="list-style-type: none"> <li>1. GACL Plot-3- Phosphoric Acid Plant chemical sludge primarily inorganic in nature, neutral and stabilized.</li> <li>2. GACL Plot-3- non-hazardous caustic brine sludge.</li> <li>3. GACL Plot-3- Insulation waste.</li> </ol> <p>The quality of these sludge uniform, neutral and stabilized and therefore no specific treatment like stabilization/encapsulation is essential before its disposal.</p>

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		Analysis of these sludge are being carried out at on-site testing facilities established/located at their source of generation and/or testing sometimes carried out at external laboratory.
14	Project proponent shall carry out periodical ground water/soil monitoring in and around the site to check the contamination including TCLP test for heavy metals.	<b>Complied.</b> Ground water/soil monitoring is being carried out through NABL accredited and GPCB approved agency M/s Unistar Environment and Research Labs Pvt. Ltd.
15	The third-party assessment on functioning of the TSDF shall be carried out through a reputed institute like NPC, IIT or any academic / research institute of similar repute once in a year and mitigation measures as may be suggested by such institute shall be implemented in consultation with the Gujarat Pollution Control Board.	<b>Compliance is being ensured.</b> GACL will plan and arrange to carry out third party assessment on functioning of the SLF through a reputed institute or any academic / research institute once in a year.
16	All measures shall be taken to prevent soil and ground water contamination.	<b>Complied.</b> Double composite liner, as recommended in CPCB guideline, had been followed during construction of SLF cell as a measure to prevent soil and ground contamination. Sample photograph of liner installation at the construction stage of SLF cell is appended as per below for information and ready reference. 
17	The project proponent shall submit the detailed study report to Gujarat Pollution Control Board (GPCB) at least once in a year comprising details of percolation rate of surface water, ground water analysis and observations of contamination to soil &	<b>Compliance is being ensured</b> GACL shall arrange to carry out detailed study comprising details of percolation rate of surface water, ground water analysis and observations of contamination to soil & ground water, if any.


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	ground water (If any) and mitigation measures to curb ground water & Soil contamination.	
18	The project proponent shall transport Hazardous waste through authorized dedicated Vehicles with GPS (Global Positioning System) enabled system and in line with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.	<b>Complied</b>  GACL ensures transportation of hazardous waste through dedicated vehicles equipped with GPS (Global Positioning System) enabled system and it is in line with the requirement prescribed in the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.
19	All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared by M/s. Eco Chem Sales and Services and submitted by project proponent; and commitments made during presentation before SEAC and proposed in the EIA report shall be strictly adhered to in letter and spirit.	<b>Noted and complying with the requirement.</b>  All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared by Eco Chem Sales and Services and submitted by project proponent and commitments made during presentation before SEAC and proposed in the EIA report are being strictly adhered to as per feasibility realised for current scenario of the site.  As an illustration compliance of typical environment protection measures are appended as below for information and ready reference. <ul style="list-style-type: none"> <li>• GPS mounted dedicated vehicle are used for transportation of Hazardous waste.</li> <li>• Waste during its transportation is kept covered to avoid leakage or spillage.</li> <li>• Usage of hydraulic Hywa is preferred for transportation of hazardous waste that prevent manual handling.</li> <li>• Modular STP provided.</li> <li>• Periodic monitoring of ground water is carried out at regular interval. etc.</li> </ul>
20	Sufficient number of Piezometer wells shall be installed in and around the project site to monitor the ground water quality in consultation with the State Pollution Control Board (SPCB) / CPCB. Trend analysis of ground water quality shall be carried out	<b>Compliance in progress</b>  Total 6 monitoring wells have been installed within the landfill site. Analysis of monitoring well is carried out at a frequency of once in month by NABL accredited and GPCB recognised agency

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	each season and information shall be submitted to the SPCB and the Regional Office of MoEF&CC.	M/s Unistar Environment and Research Labs Pvt. Ltd.
21	Pre-medical check-up to be carried out on workers at the time of employment and regular medical record to be maintained.	<b>Complied</b>  Pre-medical check-up of workers is done at the time of employment. Periodic medical examination of the workers is also followed.  Record of pre-medical check-up and periodical medical examination are maintained.
22	PP shall strictly adhere with the undertaking submitted by Executive director GACL vide dated 07/03/2020 regarding this is an independent project site (TSDF site) and not having connection with existing GACL complex and hazardous and non-hazardous solid waste shall be accepted from the plant belongs to GACL and its subsidiary company located at Dahej.	<b>Complied</b>  Currently, following wastes are being disposed at this captive SLF site. 1. GACL Plot-3- Phosphoric Acid Plant chemical sludge primarily inorganic in nature, neutral and stabilized. 2. GACL Plot-3- non-hazardous caustic brine sludge. 3. GACL Plot-3- Insulation waste.
23	Continuous monitoring of proposed TSDF/SLF shall be carried out as per GPCB/CPCB guidelines.	<b>Noted and complying with the requirement</b>  We are carrying out regular monitoring of SLF site through NABL accredited and GPCB recognised third party agency M/s Unistar Environment and Research Labs Pvt. Ltd.
<b>A.2. WATER:</b>		
24	Total water requirement for the project shall not exceed 137 KLD. Unit shall reuse 7 KLD treated wastewater. Hence, the total fresh water requirement shall be 130 KLD and it shall be met through GIDC water supply only. Prior permission from the concerned authority shall be obtained before withdrawal of water.	<b>Complied</b>  Total fresh water requirement for this site is meet through GIDC water supply only and is not exceeding 130 KLD.
25	Water meter shall be installed and its records of daily water consumption shall be maintained.	<b>Complying with the requirement</b>  Water meter has been installed in the GIDC water supply network.



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26	Adequate leachate collection system shall be provided to collect the leachates at a collection point.	<p><b>Complied</b></p> <p>Adequate leachate collection system is provided as per design document to collect the leachates at a collection point.</p> <p>Adequacy of leachate collection system is endorsed by M/s. GITCO Ahmedabad.</p>
27	Waste water generation from the Floor/vehicle washing and Leachate well shall not exceed 83.3 KLD. Entire effluent shall be treated in-house in ETP having primary treated and then treated effluent shall be sent to CETP Dahej for further treatment and disposal after ensuring that it meets with the CETP inlet norms prescribed by GPCB.	<p><b>Complied</b></p> <p>Referring to the design features of SLF as recommended by NPC, the entry and exit of the dumpers inside the pit is practically not possible. The dumpers simply station at the boundary of the SLF pit and unload the sludge by tilting mechanism with the application of hydraulic jack and therefore, the tyres do not get in contact with the waste. Hence, waste water is not generated due to vehicle washing.</p> <p>You may refer sample photograph of the SLF pit is as below.</p>  <p>From the photo, it is obvious that vehicle can't enter into the SLF pit. Further, we have obtained drainage release order from GIDC for further disposal of treated effluent to CETP Dahej.</p>
28	Domestic wastewater generation shall not exceed 8 KL/day for proposed project and it shall be treated in STP. Treated sewage shall be utilized for gardening and plantation purpose within premises after achieving on-land discharge norms prescribed by the GPCB.	<p><b>Noted and compliance is ongoing.</b></p> <p>This site is under development stage and current utilization is up to 20% of its total capacity.</p> <p>Domestic waste water generation is very limited and currently it is being disposed through soak pit.</p>

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					Modular STP of 3 KLD is procured and provided at site. However, it will be put into use once sufficient manpower is mobilised at site.				
29	During monsoon season when treated sewage may not be required for the plantation / Gardening / Green belt purpose, it shall be stored within premises. There shall be no discharge of waste water outside the premises in any case.				<b>Noted and compliance is ongoing.</b>  Currently sewage is being disposed through soak pit. Modular STP of 3 KLD is provided. It will be put into operation once sufficient manpower is mobilised at site.				
30	Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water during rainy days.				<b>Complied.</b>  We have obtained CETP membership for disposal of treated waste water hence requirement of buffer water storage tank is not envisaged.				
31	Enough care shall be taken to prevent any leakages/accidental spillages during conveyance of the leachate from the leachate well to Leachate collection tanks and finally to ETP.				<b>Complied.</b>  Leachate from leachate well is pumped to ETP in closed circuit. Permanent piping network is provided.				
32	A proper operation logbook containing records of quantities and qualities of leachate from secured landfill site, floor/vehicle washing waste water, disposal of effluent etc. shall be maintained and furnished to the GPCB from time to time.				<b>Noted for Compliance.</b>  Treated effluent will be disposed into GIDC pumping station. Currently, only 1 <sup>st</sup> SLF Pit is at its full utilization. However, leachate generation is very minimal and is stored in Leachate well.				
<b>A.3. AIR:</b>									
33	Unit shall provide adequate APCM with flue gas generation sources as mentioned below:				<b>Complied.</b>				
	Sr. No	Source of emission With Capacity	Stack Height (meter)	Type of Fuel			Quantity of fuel MT/Day	Type of emission i.e Air Pollutants	APCM Measure
	1	D.G. Set (100 kVA)	11	HSD			636	PM, Sox & NOx	Adequate Stack height

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		<p>Presently as per current requirement we have installed DG set of 50 KVA only. DG set is provided with adequate height stack. There is no building surround the location of DG set. Sample photograph is appended as below for information and ready reference.</p> 
34	Fuel consumption in DG set shall be as mentioned above.	<p><b>Complied.</b></p> <p>Presently as per current requirement we have installed DG set of 50 KVA only.</p> <p>Fuel consumption is not exceeding the stipulated limit.</p>
35	Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.	<p><b>Complied</b></p> <p>DG set provided at site is confirming to the Noise limit for DG set up to 100 KVA – 75 dB(A).</p> <p>DG set is provided with integral acoustic enclosure at the manufacturing stage itself.</p>
36	The flue gas emission from D.G. Set shall conform to the standards prescribed by GPCB. At no time, the emission levels shall go beyond the stipulated standards.	<p>Presently as per current requirement we have installed DG set of 50 KVA only.</p>
37	Regular monitoring of ground level concentration of SO <sub>2</sub> , NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> and VOC shall be carried out in the impact zone and its records shall be maintained. Ambient air quality levels shall not exceed the standards stipulated by the GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional	<p><b>Complied</b></p> <p>Ambient air quality monitoring is being carried out through NABL accredited and GPCB approved agency M/s Unistar Environment and Research Labs Pvt. Ltd. Measured values are well within the limit.</p>

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	control measures shall be taken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.	
38	All transporting routes within the premises shall have asphalt roads to minimize fugitive emission.	<b>Complied</b>  Transporting route surrounding SLF pit is provided and is "pucca" road.
<b>A. 4. SOLID / HAZARDOUS WASTES:</b>		
39	The proponent shall ensure that the TSDF fulfils all the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016 and the design and construction of secured landfill site is as per the guidelines of CPCB with proper leachate collection arrangement.	<b>Complied</b>  Design and construction of secured landfill site is as per the guidelines of CPCB with proper leachate collection arrangement.  GACL is conforming to the norms laid down for the transportation of the Hazardous wastes to the SLF. As an example, we are transporting landfilling waste through GPS mounted dedicated vehicle accompanied with form no. 9 TREM card.
40	Temporary hazardous waste storage area having impervious bottom and roof cover shall be provided as proposed.	<b>Noted for compliance</b>  The site is under development stage, only 02 phases are operational and transportation and disposal of waste to this site during the monsoon season is restricted.  Requirement of temporary hazardous waste storage area may be planned and developed at successive stage if required/need arise.
41	The project proponent shall not store the hazardous wastes more than the quantity that has been permitted by the CPCB / Gujarat State Pollution Control Board (GPCB).	<b>Complied</b>  Hazardous wastes is not stored more than the quantity that has been permitted by the CPCB / Gujarat State Pollution Control Board (GPCB).
42	The main operational site shall be kept covered by tarpaulin with separate rain water collection system during monsoon period.	<b>Noted for compliance</b>
43	Used oil shall be sold only to the registered recyclers.	<b>Noted for Compliance</b>  GACL shall sell used oil only to the registered recyclers as and when generated.
44	Project proponent shall explore possibilities with respect to reduction and reuse of	<b>Noted</b>

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	hazardous waste generated by them and received at the project site.	Possibilities of utilization of hazardous waste generated by GACL is being explored.
<b>A. 5. SAFETY:</b>		
46	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of hazardous wastes.	<b>Complied</b>  All the necessary precautionary measures are being taken to avoid any kind of accident during storage and handling of hazardous wastes.
47	Handling and storage of wastes shall be done in such a manner that minimal human exposure occurs.	<b>Complied</b>  Handling and storage of wastes is ensured in such a manner that minimal human exposure occurs. Manual handling of waste is eliminated/minimised to the extent possible by way of following measures and wherever manual intervention is required for handling of waste, it will be arranged through trained manpower.  1. Hywa with hydraulic mechanism are engaged for transporting waste. 2. Poclain is mobilized for unloading waste from hywa at SLF site.
48	All transportation of hazardous materials shall be as per the Motor Vehicle Act & Rules.	<b>Complied</b>
49	Personal Protective Equipment shall be provided to workers and its usage shall be ensured and supervised.	<b>Complied</b> Necessary PPE's to the workers handling the hazardous waste is provide regularly. It is also supervised that they use PPE's in routine job.
50	First Aid Box and required Antidotes for the chemicals used in laboratory shall be made readily available in adequate quantity at all the times.	<b>Complied</b> First aid box is provided and maintained as required.
51	Training shall be given to all workers on safety and health aspects of handling hazardous wastes.	<b>Complied</b> Training to all concerned workers @ occupational safety and health aspects of handling hazardous wastes is being provided.
52	Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per	<b>Complied</b> Pre-medical check-up and periodical medical

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	the Factories Act and Rules. Pre-employment and periodical medical examination for all workers shall be undertaken as per statutory requirement.	examination of workers is ensured on a regular basis and records are maintained.
53	Project proponent shall prepare and implement an On-Site Emergency Management Plan and Disaster Management Plan (DMP) for the project as per the guidelines from Directorate of Industrial Safety and Health. Adequate fire-fighting facilities shall be installed to handle the fire.	<b>Noted for Compliance</b>
<b>A. 6. NOISE:</b>		
54	The overall noise level in and around the premises shall be kept well within the standards by providing noise control measures including engineering controls like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall confirm to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.	<p style="text-align: center;"><b>Complied</b></p> <p>No manufacturing activities/process are carried out at this site.</p> <p>Noise monitoring is being carried out through NABL accredited and GPCB approved agency M/s. Unistar Environment and Research Labs Pvt. Ltd. Overall noise level is within the prescribed limit.</p>
<b>A.7. GREEN BELT AND OTHER PLANTATION:</b>		
55	Project proponent shall develop green belt all along the periphery of the TSDF as per the CPCB guidelines with plant species that are significant and used for the pollution abatement. Drip irrigation system shall be used for the green belt for optimum utilization of the water resources.	<p style="text-align: center;"><b>Noted for compliance</b></p> <p>Appropriate green belt with plant species that are significant and used for the pollution abatement is under development stage. It is being developed in phased manner as the site is under development stage.</p>
56	Project proponent shall also tie up with local agencies like gram panchayat, schools, social forestry office etc. for plantation at suitable open places in nearby villages and shall submit an action plan of plantation for next five years to the GPCB.	<p style="text-align: center;"><b>Complied</b></p> <p>Consultation with local agencies like gram panchayat, schools, social forestry office etc. for plantation at suitable open places in nearby villages is done timely as and when required.</p>
<b>B. OTHER CONDITIONS</b>		
57	All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared by Eco Chem Sales and Services and submitted by	<p style="text-align: center;"><b>Complied</b></p> <p>All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared</p>

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	project proponent and commitments made during presentation before SEAC and proposed in the EIA report shall be strictly adhered to in letter and spirit.	by Eco Chem Sales and Services and submitted by project proponent and commitments made during presentation before SEAC and proposed in the EIA report are being strictly adhered to as per feasibility realised for current scenario of the site.
58	Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC: —vide no. F. No. 22-34/2018-1A.111 dated 09/08/2018.	<b>Noted</b> Relevant standard condition for SLF is not mentioned in said Memorandum (OM) published by MoEF&CC vide no. F. No. 22-34/2018-1A.111 dated 09/08/2018.
59	In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that they should not be any adverse impact on human health & environment. Unit shall carry out third party monitoring of the proposed Spray dryer & it's APCM through the credible institutes and study report for impacts on Environment and Human. 'Health shall be submitted to GPCB every year along with half yearly compliance report.	<b>Noted</b> As per our proposal spray dryer is neither proposed nor installed at the site.
60	The project proponent shall allocate the separate fund of Rs. 71.04 Lakhs i.e. 2 % of the capital investment for Skill development of women through Anganwadi, Facility for Drinking Water in nearby villages, Medical camp at nearby villages, Promote and distribution of nutrition food for patients in Village Health Centre, General awareness health program, Distribution of tree guard, sapling and pots, Training and awareness programme in school on Environment and Safety Day, Scientific support and awareness to local farmers to increase yield of crop at Farmers Toll free services in accordance to the MoEF&CC's Office Memorandum No. F.No.22-6512017-1A.111 dated 01/05/2018. The entire activities proposed under CER shall be monitored and the monitoring report shall be submitted to the regional office of MoEF&CC as a part of half-yearly	<b>Noted for compliance</b>

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	compliance report and to district collector. The monitoring report shall be posted on the website of the project proponent.	
61	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.	<p><b>Noted for compliance</b></p> <p>Available pollution control system is being monitored regularly for efficiency and adequacy.</p> <p>In the event of failure of any pollution control system adopted by the unit, we 'll safely close down the facility and it shall not be restarted until the desired efficiency of the control equipment has been achieved.</p>
62	All the recommendations / commitments made in the EIA/EMP report of the project shall be implemented.	<p><b>Complied.</b></p> <p>All the recommendations/commitments made in the EIA/EMP report of the project are being strictly adhered to as per feasibility realised for current scenario of the site. Currently following applicable recommendations are complied with-</p> <ul style="list-style-type: none"> <li>• GPS mounted dedicated vehicle are utilized for transportation of Hazardous waste.</li> <li>• Waste during its transportation is kept covered to avoid leakage or spillage.</li> <li>• Usage of hydraulic hywa is being used for transportation of hazardous waste that prevent manual handling.</li> <li>• Modular STP provided.</li> </ul> <p>Periodic monitoring of ground water is carried out at regular interval. etc.</p>
63	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.	<p><b>Noted</b></p> <p>GACL shall adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.</p>
64	During material transfer, spillages shall be avoided and garland drain be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water.	<p><b>Complied</b></p> <p>Sludge is being transferred via mechanised arrangement i.e. poclain directly into SLP pit.</p> <p>Drain is provided to channelise the storm water separately.</p>

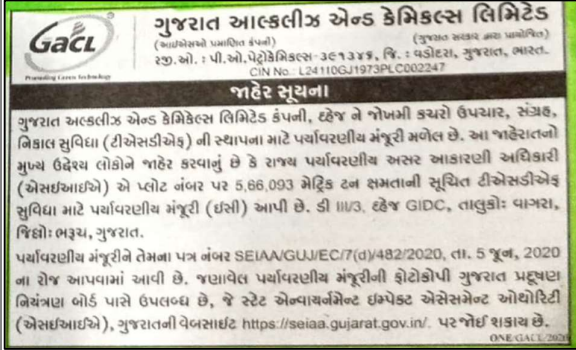
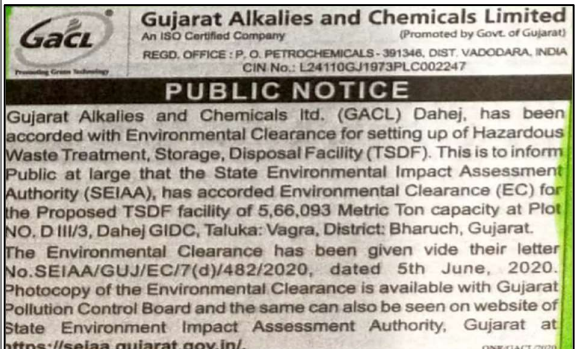


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65	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	<b>Noted</b>  The SLF site is meant for only disposal of sludge and there is no other activity which involves chemical storage and handling carried out at this site.
66	The funds earmarked for environment 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.	<b>Complied.</b>  The funds for environment protection measures have been reserved. During last year following key environment protection measures have been implemented at site.  1.Modular STP has been provided. 2.RCC flooring near ETP developed. 3. GIDC drainage connection related requirements have been fulfilled. Ex provision of TOC analyser. 4. Environment monitoring through GPCB recognized and NABL accredited laboratory. 5. Storm water drain construction.
67	Project proponent shall obtain necessary Consents/ Authorization from the Gujarat Pollution Control Board.	<b>Complied</b>  CCA for usage of SLF pit 1 had been obtained from GPCB vide AWH- 117459 dtd 11/03/2022. CCA for SLF pit 2 has been granted by GPCB vide WH-131066 dtd 18.12.2023.
68	Unit shall carry out regular monitoring of work zone area and Air vents during active and post closure period as per the prevailing guidelines shall maintain records of the same.	<b>Complied</b>  Ambient air quality monitoring is carried out through NABL accredited and GPCB approved agency M/s. Unistar Environment and Research Labs Pvt. Ltd. Measured values are well within the limit.  Appropriate vents shall be installed and monitored during site post closure phase.
69	A Separate Environment Management Cell equipped with full-fledged testing laboratory facilities shall be set up to carry out the Environment Management and Monitoring functions.	<b>Complied</b>

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70	Project proponent shall comply with all the provisions of CPCB guidelines for TSDF as may be applicable from time to time.	<b>Complied</b>  All the provisions of CPCB guidelines for TSDF as applicable for the SLF site are being complied.
71	Project proponent shall maintain accurate records of their waste generation in respect of quantity of each product manufactured, quantities and qualities of waste generated, booked & supplied to the TSDF on day-to-day basis and shall submit the compiled records to the GPCB on monthly basis.	<b>Complied</b>  Record of quality and quantity of wastes generated from GACL and its subsidiary unit is being maintained.
72	Project proponent shall make sure that they provide hazardous waste storage area having adequate retention time.	<b>Complied</b>  We are receiving landfill waste from GACL Dahej complex only and there is not any hazardous waste generation due to this landfilling activity.
73	Good housekeeping shall be maintained within the premises. All pipes, valves and drains shall be leak proof. Leakages from the pipes, pumps, shall be minimal and if occurs, shall be arrested promptly. Floor washing shall be admitted in to the effluent collection system for subsequent treatment and disposal.	<b>Complied</b>  The site is operating at initial phase with least activity which may lead to spillage and leakage. Hence there is least or no chance of such event.
74	Necessary measures shall be taken to prevent contamination of storm water from wastes / effluent handled at site. The storm water drains shall be kept separate and shall remain dry throughout the year except monsoon.	<b>Complied</b>  Sludge is being transferred via mechanised arrangement i.e. poclairn directly into SLF pit. Hence there is least chances of contamination. Presently Kaccha drain is provided to channelise the storm water separately.
75	Project proponent shall intimate the GPCB about occurrence of any accident, act or event resulting in discharge of poisonous, noxious or polluting matter or the likelihood of the same into a stream or land or well.	<b>Noted for compliance</b>
76	Project proponent shall assign specific budget for socio-economic upliftment of the surrounding villages and shall undertake eco-developmental measures including community welfare program most useful in the project area for the overall improvement	<b>Noted for compliance</b>  The budget for socio-economic upliftment of the surrounding villages has been reserved.

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	of the environment in consultation with the District Development Officer / District Collector.	
77	Project proponent shall comply with all the recommendations as well as the environmental protection measures and risk mitigation measures/safeguards proposed in the REIA Report, Risk Assessment Report & Disaster Management Plan of the project.	<p><b>Complied</b></p> <p>All the recommendations/commitments made in the EIA/EMP report of the project are being strictly adhered to as per feasibility realised for current scenario of the site. Currently following applicable recommendations are complied with-</p> <ul style="list-style-type: none"> <li>• GPS mounted dedicated vehicle are utilized for transportation of Hazardous waste.</li> <li>• Waste during its transportation is kept covered to avoid leakage or spillage.</li> <li>• Usage of hydraulic hywa is being used for transportation of hazardous waste that prevent manual handling.</li> <li>• Soak pit/modular STP provided.</li> <li>• Periodic monitoring of ground water is carried out at regular interval. etc.</li> </ul>
78	In the event of a change in project profile or change in the implementation agency, a fresh reference shall be made to the SEIAA /SEAC.	<b>Noted for compliance</b>
79	Project proponent shall thrive to obtain the ISO 14001 and OSHAS 18001 certification.	<b>Noted for compliance</b>
80	The project management shall extend full support to the officers of MoEF&CC / CPCB / GPCB during inspection of the project for monitoring purposes by furnishing full details and action plan including action taken reports in respect of mitigation measures and other environmental protection activities.	<b>Noted</b>
81	Leakages from the pipes, pumps, shall be minimal and if occurs, shall be arrested promptly.	<p><b>Complied</b></p> <p>Presently the site is operating at initial phase with least activity which may lead to spillage and leakage. Hence there is least or no chance of such event. However, Leakages from the pipes, pumps, shall be minimal and if occurs, shall be arrested promptly.</p>

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82	No further expansion or modifications in the TSDF likely to cause environmental impacts shall be carried out without obtaining prior Environment Clearance from the concerned authority.	<b>Agreed</b>
83	The above conditions will 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 along with their amendments and rules.	<b>Noted</b>
84	The project proponent shall comply all the conditions mentioned in "The Companies (Corporate Social Responsibility Policy) Rules, 2014" and its amendments from time to time in a letter and spirit.	<b>Complied</b>  CSR of GACL is being taken care in letter and spirit by CSR wing (GES - GACL Education Society).
85	The project management shall ensure that unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.	<b>Complied</b>  All the recommendations/commitments made in the EIA/EMP report of the project are being strictly adhered to as per feasibility realised for current scenario of the site. Currently following applicable recommendations are complied with- <ul style="list-style-type: none"> <li>• GPS mounted dedicated vehicle are utilized for transportation of Hazardous waste.</li> <li>• Waste during its transportation is kept covered to avoid leakage or spillage.</li> <li>• Usage of hydraulic hywa is being used for transportation of hazardous waste that prevent manual handling.</li> <li>• Soak pit/modular STP provided.</li> </ul> Periodic monitoring of ground water is carried out at regular interval. etc.
86	The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA as well as GPCB along with the implementation schedule for all the conditions stipulated herein. The funds so	<b>Noted for compliance</b>  The conditions stipulated by SEIAA as well as GPCB is being complied. Necessary funds are being allocated to fulfil the requirements.

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	provided shall not be diverted for any other purpose.	
87	The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the GPCB and may also be seen at the Website of SEIAA/ SEAC/ GPCB. This shall be advertised within seven days from the date of the clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in the Gujarati language and the other in English. A copy each of the same shall be forwarded to the concerned Regional Office of the Ministry.	<p><b>Complied</b></p> <p>Copy of the “PUBLIC NOTICE” complying with the requirement is appended as below and the same</p>   <p>is also posted on GACL website.</p>
88	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 of the environmental protection and management.	<b>Agreed</b>
89	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 soft copies to the regulatory authority concerned, on 1 <sup>st</sup> June and 1 <sup>st</sup> December of each calendar year.	<p><b>Complied</b></p> <p>GACL is regularly submitting six monthly EC compliance report to the concerned authority.</p>

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90	Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.	<b>Noted</b>
91	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	<b>Noted for compliance</b>
92	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	<b>Noted</b>
93	The company in a time bound manner shall implement these conditions. The SEIAA reserves the right to stipulate additional conditions, if the same is found necessary.	<b>Noted</b>
94	The project authorities shall inform the GPCB, Regional Office of MoEF&CC 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.	<b>Noted</b>
95	This environmental clearance is valid for seven years from the date of issue.	<b>Noted</b>
96	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.	<b>Noted</b>
97	Submission of any false or misleading information or data which is material to screening or soaping or appraisal or decision on the application makes this environment clearance cancelled.	<b>Noted</b>