



**SANJIV TYAGI**  
**MEMBER SECRETARY**  
**SEIAA, GUJARAT**

**STATE LEVEL ENVIRONMENT IMPACT**  
**ASSESSMENT AUTHORITY**  
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**No. SEIAA/GUJ/EC/5(f)/ /2008**

**Date:**  
**Time Limit**

**To,**  
**M/s. Link Pharma Chem Ltd,**  
**Plot No 163-164,**  
**GIDC Nandesari,**  
**Dist Vadodara- 391 340**

**Sub: Environment Clearance for Mfr of additional new products in the existing unit at Plot No 163-164,, GIDC Nandesari, Dist Vadodara- 391 340 by M/s. Link Pharma Chem Ltd,.....in Category 5(f) of Schedule annexed with EIA Notification dated 14/9/2006.**

Dear Sir,

This has reference to your application made along with Application Form-1, Rapid EIA report and Risk Assessment Study submitted to SEAC, seeking Environmental Clearance under Environment Impact Assessment Notification, 2006.

The proposal is for Environmental Clearance for manufacture of Mfr of additional new products [as per annexure-I attached herewith] by M/s. Link Pharma Chem Ltd, Plot No 163-164,, GIDC Nandesari, Dist Vadodara- 391 340. The unit is located in notified industrial area. The total plot area of the company is 10,815 sq.m. The project expansion cost is Rs.4 Cr. The existing unit is proposing for Mfr. & New products using the adjacent plot in GIDC Nandesari.

The project activity is covered in 5 (f) and is of 'B' Category. Since the proposed project is in notified industrial area, it does not need Public Consultation as per Para 7(i) III. Stage (3) (e) – Public Consultation of EIA Notification, 2006.

The SEAC, Gujarat had recommended to the SEIAA, Gujarat, to grant the Environment Clearance to this project for the above-mentioned products. The proposal was considered by SEIAA, Gujarat in its meeting held on 22.09.2008 at Gandhinagar. Since the EIA/ EMP Report was found to be adequate and complete and the public consultation is not required for the project, the SEIAA hereby accords Environmental Clearance to above project under the provisions of EIA Notification dated 14<sup>th</sup> September, 2006 subject to the compliance of the following Specific and General conditions.:

**A. SPECIFIC CONDITIONS:**

#### **A.1 WATER:**

1. No ground water shall be used for the project. Water supply for the project shall be sourced from GIDC.
2. The industrial effluent of 141000 liters/day to be generated shall be treated in the effluent treatment plant and the treated effluent shall be discharged into CETP of Nandesari Industries Association [NIA], Nandesari for further treatment.
3. Unit shall provide metering facility at the inlet and outlet of the ETP and maintain records for the same.

#### **A.2 AIR:**

4. High efficiency scrubbers shall be provided for scrubbing process emissions.
5. Cyclone shall be provided to control the particulate emissions from the boiler. Adequate stack height as per norms shall be provided.
6. Spent solvent recovery shall not be less than 95 percent. Measures shall be taken to reduce the process solvent vapors emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapour recovery system.
7. Gaseous emission at workplaces shall be controlled and kept below the limits prescribed by the Factories Act and Rules. Their records shall be maintained.
8. The gaseous emissions and particulate matter from various process units shall conform to the standards prescribed by GPCB. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the prescribed standards.

#### **A.3 SOLID WASTE:**

9. Hazardous and toxic waste like distillation waste, carbon waste etc shall be sent for incineration at TSDF of NECL, Nandesari.
10. ETP sludge shall be dried in sludge drying bed. It shall be packed and stored in hazardous waste storage area facility with pucca bottom and leachate collection facility.
11. Unit shall dispose its Haz waste at TSDF of NECL, Nandesari.
12. Discarded containers / liners shall be sold only to the registered recyclers after decontamination.
13. Used oil / waste oil shall be sold to only to the registered recyclers.
14. The company must strictly comply with the rules and regulations with regards to handling and disposal of Hazardous waste in accordance with the Hazardous Waste (Management and Handling) Rules 2003. Authorization from the GPCB must be obtained for collection / treatment /storage /disposal of hazardous wastes.

#### **A.4 SAFETY:**

15. Flameproof fittings shall be provided in the manufacturing plant.
16. Proper ventilation shall be provided in the work area.
17. Storage and use of toxic chemicals shall be minimized to the extent possible.
18. Acids shall be stored in MSRL tanks for safety purpose. Storage of hazardous chemicals shall be in multiple small capacity tanks / containers instead of one single large capacity tank for safety purpose.

19. All venting equipment shall have vapour recovery system. All the pumps and other equipments where there is a likelihood of leakages shall be provided with Leak Detections and Repair (LDAR) system. Provisions for immediate isolation of such equipment in case of a leakage shall also be made. The detector sensitivity shall be in ppm levels.
20. All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Close handling system for chemicals shall be provided. Double mechanical seals shall be provided for pumps /agitators for reactors for reduction of fugitive emissions and leakages. Solvent traps shall be installed wherever necessary.
21. During material transfer, spillages shall be avoided and garland drain be constructed to avoid mixing of accidental spillages with domestic waste and storm water drain.
22. Personal Protective Equipment shall be provided to workers and its usage shall be ensured and supervised.
23. First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity at all the times.
24. Training shall be given to all workers on safety and health aspects of handling chemicals.
25. Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per the Factories Act and Rules. Pre-employment and periodical medical examination for all workers shall be undertaken as per statutory requirement.
26. The project management shall strictly comply with the provisions made in Manufacture Storage and Impact of Hazardous Chemicals Rules 1989 as amended in 2000 for handling of hazardous chemicals. Necessary approvals from the Govt Authorities shall be obtained before commissioning of the project, if applicable. All Transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act & Rules. Hazardous materials storage shall be at an isolated designated location, bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals. All transporting routes within the factory premise shall have paved roads to minimize splashes and spillages.

#### **A.5 NOISE:**

27. The overall noise level in and around the plant area shall be kept 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.

#### **A.6 CLEANER PRODUCTION AND WASTE MINIMISATION:**

28. The company shall undertake following waste minimization measures:
  - a) Metering and control of quantities of active ingredients to minimize waste.
  - b) Reuse of by-products from the process as raw materials or raw materials substitutes in other processes.
  - c) Use of automated and close filling to minimize spillages.
  - d) Use of close feed system into batch reactors.
  - e) Venting equipment through vapour recovery system.
  - f) Use of high pressure hoses for equipment cleaning to reduce wastewater generation.

#### **A.7 GREEN BELT AND OTHER PLANTATION:**

29. Company shall develop green belt within premises as per the CPCB guidelines. The unit shall also tie up with local agencies like gram panchayat, schools, social forest office etc. for necessary plantation and maintenance of 5000 trees in a phased manner in 5 years at available open land in nearby gram panchayat, schools or any such areas and submit an action plan for plantation and its compliance to the GPCB.

**B. GENERAL CONDITIONS:**

21. The applicant shall upgrade its effluent treatment plant to archive the ECP norms.
22. The applicant shall strictly follow all the recommendations mentioned in the Charter on Corporate Responsibility for Environment Protection (CREP) published by the Central Pollution Control Board.
23. A separate Environment Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environment Management and Monitoring functions.
24. The company shall undertake eco-developmental measures including community welfare program most useful in the project area for the overall improvement of the environment.
25. The company shall develop rain water harvesting structures to harvest the run off water for recharge of ground water. Also harvesting of surface as well as rainwater from the rooftops of the building proposed in the project shall be undertaken and the same water shall be used for the various activities of the projects to conserve fresh waster.
26. At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.
27. The project management shall also comply with all the environment protection measures, risk mitigation measures and safeguards recommended in the EIA / EMP report as well as other proposals made by them.
28. The applicant 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.
29. No further expansion 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 the SEIAA/ SEAC to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
30. 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 provided shall not be diverted for any other purpose.
31. 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.
32. 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 1st June and 1st December of each calendar year.
33. The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.

34. 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.
35. The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.
36. 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. 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 and Handling) Rules, 2003 and the Public Liability Insurance Act, 1991 along with their amendments and rules.
37. This Environmental Clearance is valid for five years from the date of issue.

With regards,  
Yours sincerely,

**(SANJIV TYAGI)**  
**Member Secretary,**  
**State Level Environment Impact Assessment Authority**  
**Gujarat**

Copy to:-

1. The Secretary, Department of Environment and Forests, Govt. of Gujarat, Secretariat, Gandhinagar-382010.
2. The Chairman, Central Pollution Control Board , Parivesh Bhavan, CBD -cum-Office Complex, East Arjun Nagar, New Delhi-110032
3. The Chief Conservator of Forests (Central), Ministry of Environment & Forests, Regional Office (WZ), E-5, Arera Colony, Link Road-3, Bhopal-462016, MP
4. Monitoring Cell, Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi-110003.
5. The Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector-10-A, Gandhinagar-382 010.
6. Select File.

**PROPOSED EXPANSION PRODUCTS:**

<b>Sr. No.</b>	<b>Product</b>	<b>Qty. / month (MT)</b>
1.	Niclosamide	10
2.	Oxyclozanide	10
3.	Frusemide	4.8
4.	Fenbendazole	10
5.	Albendazole	12
6.	Mesalamine(5-Amino-Salicylic Acid)	3.3
7.	Hydrochlorothiazide (Htz)	10
8.	Mebendazole	7.8
9.	5 Nitro Salicylic Acid	4.5
10.	Temephos	25
11.	Clorsulan	10
12.	Bumetanide	6
13.	Fenofibrate	5
14.	Xipamide	5
15.	Dimethyl Formamide (Dmf) Pure	58
16.	Dimethyl Sulphoxide (DmsO) Pure	40
17.	Phenyl Acetyl Chloride	20
18.	Cads (Chloro Aniline Disulphonamide)	10
19.	3,4-Diamino Diphenyl Thio Ether	8
20.	3,4-Diamino Phenyl N-Propyl Thioether (DPPT)	9
21.	3,4-Diaminobenzophenone	6
22.	2-Chloro Methyl Propionate (Methyl Chloro Propionate)	25
23.	Bi Thional Sulphoxide (Btso)	5
24.	4-Chlro Salicylic Acid	10
25.	Triclabendazole	5
26.	4Chloro-6[(5,6-Dichloro)-Phenoxy]1,2Diphenylene-Amine (Trichloro-Phenoxy-Phenylene Diamine- TCPD)	5
27.	Dicamba	10
28.	6 Nitro 3 Chloro Aniline	6.4
29.	Oxfenbendazole	5
30.	Triazinone	20

## LIST OF ADDITIONAL BY-PRODUCTS:

Sr. No.	By-Product	Generated from:	Qty. (Mt / Month) (based on batch calculations)	Total in MT/Month
1.	HCl Solution (30 %)	Niclosamide Clorsulan Bumetanide Fenofibrate Phenyl acetyl chloride Cads (chloro aniline disulphonamide) 3,4-Diaminobenzophenone 2-Chloro methyl propionate (Methyl chloro propionate) Bi thional sulphoxide (btso) 4-Chloro salicylic acid Dicamba	4.6 3.9 2.34 1.9 16.76 18.815 3.912 27.04 4.74 9.15 22.016	115
2.	Phosphorous Acid residue	Niclosamide	2.7	3
3.	Na salt of Methyl Mercaptain (30 %)	Mebendazole	7.05	7
4.	3- Nitro Salicylic Acid	5 nitro salicylic acid	1.15	1.2
5.	AlCl <sub>3</sub> solution	Clorsulan 3,4-Diaminobenzophenone Bi thional sulphoxide (btso)	41.97 25.20 12.58	80
6.	IPA	Fenofibrate	1.2	1.2
7.	Rec Methanol	Xipamide	0.4	0.4
8.	Low cut solvents	Dimethyl formamide (dmf) pure	2.56	2.6
9.	Sodium bi-sulphite solution	Phenyl acetyl chloride Cads (chloro aniline disulphonamide)	47.6 27.937	76
10.	25 % H <sub>2</sub> SO <sub>4</sub> Solution	CADS (chloro aniline disulphonamide) Dicamba 6 Nitro 3 Chloro Aniline	40.789 47.54 80	168
11.	Sodium thio sulphate solution	3,4-Diamino phenyl n-propyl thioether (DPPT) 3,4-Diaminobenzophenone	38.57 40.80	79
12.	2, 4, 6 Tri-chloro Toluene	Dicamba	4.918	5
13.	Sulphite solution	3,4-Diaminobenzophenone	15.60	16
14.	Cuprous Chloride	Triazinone	9.89	10