

Purvesh Jitendra Kumar Soni/EHS/Ankleshwar

From: Purvesh Jitendra Kumar Soni/EHS/Ankleshwar
Sent: 27 April 2024 10:02
To: iro.gandhingr-mefcc@gov.in; ec-rdw.cpcb@gov.in; ecompliance-guj@gov.in; roank.gpcb@gmail.com
Cc: Mritunjay Chaubey/EHS/Navi Mumbai; Vikas Garg/Manufacturing/Navi Mumbai; Vinod Singh/Manufacturing/Ankleshwar; Ankitkumar Prabhat Khare/Manufacturing/Ankleshwar; Kumar Om Prakash/EHS/Ankleshwar
Subject: UPL Limited Unit 01 - Submission of Half yearly Compliance Report to conditions of Environmental Clearances for Period October 23 to March 24
Attachments: U_01_EC_Half_Yearly_Compliance_Report_For_OCT_23_TO_MARCH_24..pdf

Tracking:	Recipient	Delivery
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	Mritunjay Chaubey/EHS/Navi Mumbai	Delivered: 27-04-2024 10:02
	Vikas Garg/Manufacturing/Navi Mumbai	Delivered: 27-04-2024 10:02
	Vinod Singh/Manufacturing/Ankleshwar	Delivered: 27-04-2024 10:02
	Ankitkumar Prabhat Khare/Manufacturing/Ankleshwar	Delivered: 27-04-2024 10:02
	Kumar Om Prakash/EHS/Ankleshwar	Delivered: 27-04-2024 10:02

To,
Deputy Director General of Forests (C),
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

BY EMAIL

Sub: - Half yearly Compliance Report to conditions of Environmental Clearances (October 2023 to March 2024)
For UPL Limited Unit-01 located at Plot # 117 / 118, GIDC Notified Industrial Estate, Ankleshwar – 393002, Dist. – Bharuch, Gujarat.

Ref: - (1) Environmental Clearance J.11011/117/2002-IA. II dated 17.07.2003.
(2) Environmental Clearance J.11011/407/2006-IA. II(I) dated 04.04.2007 for Product Mix Change
(3) Environmental Clearance J-11011/582/2017-IA-II(I) dated 29/11/2019
(4) MoEF &CC Notification No. S.O 5845(E) dated 26th November,2018

Dear Sir,

Kindly refer above Environmental Clearance (Ref 1 & Ref 3) granted to our Unit # 01 located at Plot # 117 / 118, GIDC Notified Industrial Estate, Ankleshwar – 393002, Dist. – Bharuch, Gujarat.

We are sending herewith the half yearly compliance report along with various other required details with respect to our Unit # 01 for your kind reference and records. The details given are with respect to the period of **October 2023 to March 2024.**

Kindly refer above Environmental Clearance (Ref 2) # J.11011/407/2006-IA. II(I) dated 04.04.2007 granted to our Unit # 1- This was for product mix change. We have not implemented and not obtained NOC (CTE).

Now in compliance to MOEF&CC OM No. IA3-22/1/2022-IA-III [E-172624] dated 14th June 2022, we have uploaded and Submitted compliance of conditions to Granted Environmental Clearance at Parivesh 2.0 portal. The compliance report uploaded at portal is enclosed herewith.

We hope that the above is in order. In case you need any additional information, we can provide the same on hearing from you.

Thanking you,

Yours faithfully,
For, UPL Limited

Vinod Singh
(Unit Head)

Encl : Half Yearly Environmental Clearance Condition Compliance Report for October 2023 To March 2024

Copy to:

The Zonal Officer
Central Pollution Control Board
Parivesh Bhavan
Opp VMC Ward Office # 10
Subhan Pura, Vadodara – 390 023

The Regional Officer
Gujarat Pollution Control
Board
Ankleshwar – 393 002
GPCB XGN ID # 15833



UPL Limited
Unit-1 Plot No. 117 / 118,
GIDC, Ankleshwar-393002
Dist. Bharuch, Gujarat, India.

w : upl-ltd.com
t : +91 2646 251013.

To,
Deputy Director General of Forests (C),
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

Date:-26-04-2024

BY EMAIL

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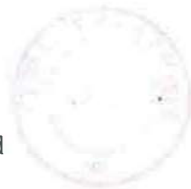
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Thanking you,

Yours faithfully,

For, UPL Limited
Vinod Singh
(Unit Head)



Encl : a/a
Copy to:

The Zonal Officer
Central Pollution Control Board
Parivesh Bhavan
Opp VMC Ward Office # 10
Subhan Pura, Vadodara -- 390 023

The Regional Officer
Gujarat Pollution Control Board
Ankleshwar – 393 002
GPCB XGN ID # 15833

Your (**Environment Clearance**) application has been **Submitted** with following details

Proposal No	IA/GJ/IND/19488/2003
Compliance ID	25854943
Compliance Number(For Tracking)	EC/M/COMPLIANCE/25854943/2024
Reporting Year	2024
Reporting Period	01 Jun(01 Oct - 31 Mar)
Submission Date	27-04-2024
IRO Name	Shrawan Kumar Verma
IRO Email	kr099.ifs@nic.in
State	GUJARAT
IRO Office Address	Integrated Regional Offices, Gandhi Nagar

Note:- SMS and E-Mail has been sent to Shrawan Kumar Verma, GUJARAT with Notification to Project Proponent.

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Vinod
Singh,PP[Back](#)

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Proposal Details

Proposal No	IA/GJ/IND/19488/2 003	Category	Industrial Projects - 3		
Name of Project	Expansion of Pesticide unit by M/s United Phosphorus Ltd. - Unit-I at Ankleshwar in District Bharuch, Gujarat reg environmental clearance .				
Plot / Survey/ Khasra No.		Village(s)		Sub-District(s)	
State	GUJARAT	District	BHARUCH		
MoEF File No	J.11011/117/2002- IA II	Name of the Entity/ Corporate Office	UPL Limited	Entity's PAN	NA
Entity Name as per PAN	NA	Entity details mentioned above is correct ?	Agree		
Project KML	NA				

Covering Letter

Covering Letter [Click to View](#)

Compliance Reporting Details

Reporting Year 2024 **Reporting Period** 01 Jun(01 Oct - 31 Mar)
Remark(if any) We are submitting herewith EC Half Yearly Compliance report for the period of October-2023 to March-2024.

Details of Production and Project Area

Date of Commencement of Project/Activity 17-12-2004

	Project Area as per EC Granted(ha.)	Actual Project Area in Possession(ha.)
Private	0	0
Revenue Land	0	0
Forest	0	0
Others	0	0
Total	0	0

PRODUCTION CAPACITY

Sr.No.	Name of the Product	Units	As per EC Granted	As per CTO Granted	CTO ID	Valid Up To	Production during last financial year
1	Pesticide Technical	Tons per Annum	56640				14538

PRODUCTION CAPACITY

Sr.No.	Name of the Product	Units	As per EC Granted	As per CTO Granted	CTO ID	Valid Up To	Production during last financial year
		(TPA)					
2	Pesticide Intermediates	Tons per Annum (TPA)	25200				9730

Conditions

Specific Conditions

Sr.No.	Condition Type	Condition Details	Status of Compliance,Remarks/Reason and Supporting Documents	
1	AIR QUALITY MONITORING AND PRESERVATION	The gaseous emissions (SO ₂ , NO _x , HCl, HC and Cl ₂) and particulate matter from various process units should conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels should go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit should not be restarted until the control measures are	PPs Submission	The unit has installed Bag Filters, Water Scrubbers, Caustic Scrubbers, Acid Scrubbers & Cyclones for control of Gaseous emission. We have also provided interlocking system with Alaram at DCS in Control Room. In Event of deviation in Air pollution control devices, the respective under undergoes safe shutdown and does not allowed to restart until rectification to problem is enabled. The NABL Accredited Third party Analysis Reports with summery of stack monitoring report is attached. Complied Attachment: Click to View

		rectified to achieve the desired efficiency.		
2	AIR QUALITY MONITORING AND PRESERVATION	Fugitive emissions in the workplace environment, product, raw material storage areas must be regularly monitored. The flue gas emissions should conform to the standards prescribed by the Gujarat Pollution Control Board.	PPs Submission	Fugitive emission monitoring at work place environment, product, raw material storage area being carried out by QA Department. the Fugitive emission monitoring report are attached. Complied Attachment: Click to View
3	AIR QUALITY MONITORING AND PRESERVATION	The process emissions (SPM, HCl, SO2, methyl chloride and volatile organic carbon) should be scrubbed through caustic ventury scrubber and conform to prescribed standards. The efficiency of the scrubber should be improved and maintained as per the best practicable technology. VOC data should be monitored and submitted to the Ministry. Additional ventury scrubbers for Mancozeb, Penoxaline, Phosphamidon plant and a Scrubber for Cartap plant should be installed in addition to the process scrubbers	PPs Submission	The unit has installed appropriate air pollution control devices like Bag Filters, Water Scrubbers, Caustic Scrubbers, Acid Scrubbers & Cyclone. the more details is attached. Complied Attachment: Click to View

		already installed in the existing unit.		
4	WATER QUALITY MONITORING AND PRESERVATION	As reflected in the EIA /EMP report, effluent generation should not exceed 195m3/d. The waste streams should be segregated into high and low pollution load streams. The effluent with high organic load shall be incinerated and dilute streams i.e. from R&D, washing, domestic, dilute streams from process and scrubber blow down should be given primary, secondary, and tertiary treatment before discharging into GIDC drain. The treated effluent should conform to the prescribed standards. The non-toxic effluent should be diverted to RO plant and recycled to minimise fresh water consumption.	PPs Submission	The unit is maintaining Zero Liquid Discharge (ZLD) since July-2021 using Forward Osmosis (FO) system followed by evaporation system. The treated effluent analysis report (through internal lab) is attached. for the period October-2023 to March-2024. The treated effluent from ETP is sent to RO Plant for Treatment & Recycle / Reuse since unit has implemented ZLD from July-2021: Complied Attachment: Click to View
5	WASTE MANAGEMENT	The waste stream should be treated suitably before taking into solar evaporation pond. Solvents from the effluent should be recovered before	PPs Submission	The Company has discontinued Solar Evaporation ponds from August 2007. The correspondence for discontinuation of solar evaporation has been submitted to MoEF, New Delhi in August 2007. The more details is attached.

		<p>discharging into the solar evaporation pond. As reflected in the EIA /EMP report, the Company should install forced evaporation system for aqueous waste to avoid discharge of effluent into solar evaporation pond.</p>	<p>Complied Attachment: Click to View</p>		
6	MISCELLANEOUS	<p>The Company should recover methyl chloride (CH₃Cl) by installation of CH₃Cl recovery plant. Further, solvent recovery should be improved and attempts should be made to achieve atleast 90% recovery, wherever possible. Rest of the solvents, which can't be recovered should be incinerated. Action plan in this regard should be submitted to the Ministry within three months.</p>	<table border="1"> <tr> <td>PPs Submission</td> <td> <p>Methyl Chloride Plant is in operation with recovery of 99%. The more details is attached. Complied Attachment: Click to View</p> </td> </tr> </table>	PPs Submission	<p>Methyl Chloride Plant is in operation with recovery of 99%. The more details is attached. Complied Attachment: Click to View</p>
PPs Submission	<p>Methyl Chloride Plant is in operation with recovery of 99%. The more details is attached. Complied Attachment: Click to View</p>				
7	WASTE MANAGEMENT	<p>The Company should upgrade existing incinerator for incineration of hazardous waste. The organic waste, solid waste generated from the unit should be</p>	<table border="1"> <tr> <td>PPs Submission</td> <td> <p>Company has discontinued operation of Incinerator for disposal of Hazardous Waste. the Hazardous waste is given to Recycler, reprocessor, pre-processor, co-processing, TSDF based on applicability of recommended treatment at disposal in authorization granted by GPCB. The more details is attached.</p> </td> </tr> </table>	PPs Submission	<p>Company has discontinued operation of Incinerator for disposal of Hazardous Waste. the Hazardous waste is given to Recycler, reprocessor, pre-processor, co-processing, TSDF based on applicability of recommended treatment at disposal in authorization granted by GPCB. The more details is attached.</p>
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		<p>collected and incinerated for total destruction. As reflected in the EIA / EMP report, the solid waste and the ash obtained after incinerator should be stored within the plant premises in a pit with impervious flooring and leachate collection system. The incinerated ash and the sludge from ETP should be finally disposed off in a common Treatment, Storage and Disposal Facility (TSD) developed by M/s Bharuch Enviro Infrastructure Limited. The leachate should be sent to ETP for treatment</p>	<p>Complied Attachment: Click to View</p>		
8	WASTE MANAGEMENT	<p>The destructive efficiency of the incinerator should be assessed by an agency like the Central Pollution Control Board and a report submitted. The Company should monitor VOCs and data submitted to the Ministry /CPCB/SPCB regularly.</p>	<table border="1"> <tr> <td data-bbox="940 1019 1201 1338">PPs Submission</td> <td data-bbox="1201 1019 1906 1338"> <p>Company has discontinued operation of Incinerator since April 2004. The incinerable waste has been sent to common incineration facility to BEIL Ankleshwar. The copy of letter submitted to MoEF and VOC monitoring reports are attached. Complied Attachment: Click to View</p> </td> </tr> </table>	PPs Submission	<p>Company has discontinued operation of Incinerator since April 2004. The incinerable waste has been sent to common incineration facility to BEIL Ankleshwar. The copy of letter submitted to MoEF and VOC monitoring reports are attached. Complied Attachment: Click to View</p>
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9	WATER QUALITY MONITORING AND PRESERVATION	As per the Charter on Corporate Responsibility on Environment Protection, the bio-assay test should be replaced by Toxicity Factor test method developed by CPCB. Toxicity factor of four (TF-4) should be achieved by December 2003 and TF-2 by July, 2006. Action plan in this regard should be submitted within three months on issue of this letter.	PPs Submission	The details of reports are attached. Complied Attachment: Click to View
10	GREENBELT	Green belt of adequate width and density in a project area of 0.2 ha. in addition to 3.66 ha. of area already afforested should be provided to mitigate the effect of fugitive emissions all round the plant. The development of green belt along the boundary wall, open space and avenue roads should be improved in consultation with the local DFO as per the CPCB guidelines.	PPs Submission	The unit was established in 1980-81 at notified industrial estate, GIDC, Ankleshwar. Till date 3.86 Hectore of factory area is developed as green belt as per CPCB Guide lines. the details report is attached. Complied Attachment: Click to View
11	WASTE MANAGEMENT	The Company should adopt waste	PPs Submission	The unit has special team like Maxpro, Maxpro+, Green Cell & R & D for resource reduction and recovery

		minimization/cleaner production techniques to reduce the pollution load and action plan in this regard should be submitted to the Ministry within three months.		improvement, yield improvement and waste conversion to valuable products. The more details are attached. Complied Attachment: Click to View
12	WATER QUALITY MONITORING AND PRESERVATION	The Company should undertake rainwater harvesting measures as per action plan in this regard submitted to this Ministry.	PPs Submission	The unit has implemented rainwater harvesting at Admin Building, Canteen R&D and QA & QC Buildings as per action plan submitted to MoEF& CC. The total 1748 SqM Roof Top area is covered. The more details is attached. Complied Attachment: Click to View
13	MISCELLANEOUS	The project proponent shall comply with the environmental protection measures and safeguards recommended in EIA/EMP/Risk Analysis reports as well as the recommendations of the public hearing panel.	PPs Submission	The Summarized EMP and Implementation status is given in attachment. Complied Attachment: Click to View

General Conditions

Sr.No.	Condition Heading	Condition Details	Status of Compliance,Remarks/Reason and Supporting Documents	
1	Statutory compliance	The project authorities must strictly adhere to the stipulations made	PPs Submission	We comply all the stipulations made in CC&A by GPCB. The Adequacy CERTIFICATE is in place.

		by the Gujarat Pollution Control Board.		Complied Attachment: Click to View
2	Statutory compliance	No further expansion or modifications in the plant should be carried out without prior approval of the Ministry of Environment & Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference should be made to the Ministry to assess adequacy of the conditions imposed and to add additional environmental protection measures required, if any.	PPs Submission	The unit has obtained Expansion of Environmental Clearance from MOEF in year 2019 and Amendment to EC in year 2020 and also we have obtained Valid CC&A from GPCB vide letter No- AH-131419 dated 20.03.2024 valid upto 19.11.2024. Complied Attachment: NA
3	Statutory compliance	The project authorities must strictly comply with the rules and regulations under the Manufacture, Storage and Import of Hazardous Chemicals Rules, 2000. Prior approvals of Chief Inspector of Factories,	PPs Submission	The Compliance to MSIHC Rules 2000 and its amendments has been adhered by providing following facilities. 1) Fire Fighting Network as per Standards 2) PPE to All Workers 3) First Aid Measures 4) Occupational Health Centre and Availability of Doctor with nurse. 5) Ambulance in Place 6) Risk Assessment and Hazop Studies 7) On Site / Off site emergency Plan in Place & attached herewith 8) Periodic Mock Drills 9) Training and Awareness 10) Annual / Half Yearly Health Check Ups 11) Annual Safety Audits by Third Party and Submission of

		Chief Inspector of Explosives, Fire Safety Inspectorate etc., must be obtained.		Compliance to Audit to DISH Office and also we have abtained approvals from Chief Inspector of Factories, Chief Inspector of Explosives, Fire Safety Inspector. Complied Attachment: Click to View
4	Statutory compliance	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2000. Authorization from the State Pollution Control Board must be obtained for collection, storage, treatment and disposal of hazardous wastes.	PPs Submission	We have obtained Authorization from the Gujarat Pollution Control Board vide letter no- AH-131419 dated 20.03.2024 Valid upto 19.11.2024. The hazardous wastes disposal statement is attached. Complied Attachment: Click to View
5	Noise Monitoring & Prevention	The overall noise levels in and around the plant area should be kept well within the standards (8SdBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc., on all sources of noise	PPs Submission	The work place noise monitoring at plant areas has been regularly conducted by internal and External laboratory. The summery of external monitoring results of Ambient Noise level at different location around Plant areas is attached. All reports are well within permisable limit. Complied Attachment: Click to View

		<p>generation. The ambient noise levels should conform to the standards prescribed under the Environment (P) Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).</p>		
6	Human Health Environment	<p>Occupational health surveillance programme should be undertaken as regular exercise for all the employees, specifically for those engaged in handling hazardous substances. First aid facilities in the Occupational Health Care Centre should be strengthened and medical records of each employee should be maintained separately.</p>	PPs Submission	<p>Regular medical checkup of each employee has been conducted for Physical Examination, Hemoglobin, CBC, ESR, ECG, Complete Urine Examination, Liver Function, Kidney Function, Creatine, Blood Sugar, X Ray for Chest, sonography etc. The sample copy of Medical Report has been attached. Pre-employment medical checkup was also done for all new joiners. The unit has provided in-plant clinic facility with resident doctor. The in-plant clinic is facilitated with latest medical equipment, antidots and essential medicines. The Medical record of all employees has been maintained and reviewed annually. Complied Attachment: Click to View</p>
7	MISCELLANEOUS	<p>A separate Environment Management Cell equipped with full fledged laboratory facilities must be set up to carry out the Environmental Management and monitoring functions</p>	PPs Submission	<ul style="list-style-type: none"> • Internal Environment management cell comprising of Unit Head, plant Head, SHE Head & Corporate Environment head is in operation for close monitoring. • The environment cell verifies environmental performance and involves in environmental audit. • Stack Monitoring, Ambient Air Monitoring, Solid Waste Analysis is being done by third party (BEIL Infrastructure Ltd) while Bioassay Test, Toxicity Factor test, Fugitive Emission, VOC Monitoring, Noise Level Monitoring are carried out by our internal laboratory. The analysis of effluent is done in our

			<p>full-fledged internal laboratory. The details report is attached.</p> <p>Complied</p> <p>Attachment: Click to View</p>
8	MISCELLANEOUS	<p>The project authorities will provide adequate funds both for recurring and non-recurring expenditure to implement the conditions stipulated by the Ministry of Environment & Forests as well as the State Government along with the implementation schedule for all conditions stipulated herein. The funds should not be diverted for any other purposes</p>	<p>PPs Submission</p> <p>The funds are already provided as part of manufacturing activities and operation of ETP and disposal of Hazardous/Non-Hazardous wastes. The year wise details of environmental expenditures is attached.</p> <p>Complied</p> <p>Attachment: Click to View</p>
9	MISCELLANEOUS	<p>The implementation of the project vis-a-vis Environmental Action Plans will be monitored by Ministry's Regional Office at Bhopal/Gujarat Pollution Control Board/ Central Pollution Control Board. A six monthly</p>	<p>PPs Submission</p> <p>The project has been implemented with environmental action plan. Half yearly compliance reports are being sent during December and July every year to Ministry of Environment and Forests Regional Office, Western Region, Bhopal. The detailed summary of EC Compliance Submission is given in attachment. Complied</p> <p>Complied</p> <p>Attachment: Click to View</p>

compliance status report should be submitted to the monitoring agencies.

10

MISCELLANEOUS

The Project Proponent should inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the State Pollution Control Board/ Committee and may also be seen at Website of the Ministry of Environment and Forests at <http://envfor.nic.in>. This should be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same should be forwarded to the Regional office.

PPs Submission

The unit has received environmental clearance letter on 1/8/2003 & published in Gujarati newspaper Gujarat Samachar and English news paper– Times of India on 4/8/2003. The copy is attached.
Complied
Attachment: [Click to View](#)

11	MISCELLANEOUS	The project Authorities should inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of commencing the land development work, if any	PPs Submission	Financial Closure Date: The unit has not taken any loan from Bank OR Financial Institute as the capital investment adjusted internally. Hence Financial Closure is not applicable. Final Approval Details: The project has received following approvals from GPCB. • Consent to Operate (NOC). Complied Attachment: NA
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Document uploaded by the PP

Last Site Visit Report (if available)	NA	Last Site Visit Report Date (if available)		Additional Attachment (if any)	NA
Additional Remarks (if any)					

I 'UPL Limited' hereby give undertaking that the data and information given in the filed compliance and enclosures are true to be best of my knowledge and belief and I am aware that if any part of the data and information found to be false or misleading at any stage, the clearance given to the project will be revoked at our risk and cost. In addition to above, I hereby give undertaking that no activity such as change in project layout, construction, expansion, etc. has been taken up without due approval.

Cover Letter From RO/SRO

Cover Letter From RO/SRO	NA
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Your (**Environment Clearance**) application has been **Submitted** with following details

Proposal No	IA/GJ/IND2/80387/2017
Compliance ID	25858699
Compliance Number(For Tracking)	EC/M/COMPLIANCE/25858699/2024
Reporting Year	2024
Reporting Period	01 Jun(01 Oct - 31 Mar)
Submission Date	27-04-2024
IRO Name	Shrawan Kumar Verma
IRO Email	kr099.ifs@nic.in
State	GUJARAT
IRO Office Address	Integrated Regional Offices, Gandhi Nagar

Note:- SMS and E-Mail has been sent to Shrawan Kumar Verma, GUJARAT with Notification to Project Proponent.

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Proposal Details

Proposal No	IA/GJ/IND2/80387/ 2017	Category	Industrial Projects - 3		
Name of Project	Expansion of pesticides and Pesticide specific intermediate by M/s UPL Limited (Unit 1) at Plot No.117/118, GIDC Industrial Estate, Ankleshwar, District Bharuch (Gujarat)				
Plot / Survey/ Khasra No.		Village(s)		Sub-District(s)	
State	GUJARAT	District	BHARUCH		
MoEF File No	J-11011/582/2017- IA-II (I)	Name of the Entity/ Corporate Office	M/s UPL Limited	Entity's PAN	NA
Entity Name as per PAN	NA	Entity details mentioned above is correct ?	Agree		
Project KML	NA				

Covering Letter

Covering Letter [Click to View](#)

Compliance Reporting Details

Reporting Year 2024 **Reporting Period** 01 Jun(01 Oct - 31 Mar)
Remark(if any) We are submitting herewith EC Half Yearly Compliance report for the period of October-2023 to March-2024.

Details of Production and Project Area

Date of Commencement of Project/Activity 19-05-2021

	Project Area as per EC Granted(ha.)	Actual Project Area in Possession(ha.)
Private	0	0
Revenue Land	0	0
Forest	0	0
Others	0	0
Total	0	0

PRODUCTION CAPACITY

Sr.No.	Name of the Product	Units	As per EC Granted	As per CTO Granted	CTO ID	Valid Up To	Production during last financial year
1	Pesticide Technical	Tons per Annum	56640				14538

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Specific Conditions

Sr.No.	Condition Type	Condition Details	Status of Compliance,Remarks/Reason and Supporting Documents	
1	Statutory compliance	CTE/CTO for the project shall be obtained from the SPCB as required under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974, and the SPCB shall follow the mechanism/protocol issued by the Ministry vide letter no. Q-16017/38/2018-CPA dated 24th October, 2019 while issuing the CTE/CTO for the project, for improvement of	PPs Submission	The Unit has existing valid Consent to Operate Authorization obtained from GPCB vide letter No. AH-131419 dated 20.03.2024 Valid up to 19.11.2024. Complied Attachment: NA

		environmental quality in the area.		
2	WASTE MANAGEMENT	Necessary authorization required under the Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016, Solid Waste Management Rules, 2016 shall be obtained and the provisions contained in the Rules shall be strictly adhered to.	PPs Submission	The Unit has existing valid Consent to Operate Authorization obtained from GPCB vide letter No. AH-131419 dated 20.03.2024 Valid up to 19.11.2024. Complied Attachment: NA
3	AIR QUALITY MONITORING AND PRESERVATION	National Emission Standards for Pesticides Manufacturing Industry issued by the Ministry vide G.S.R.446(E) dated 13th June 2011, as amended from time to time, shall be followed.	PPs Submission	We are complying National Emission Standards for Pesticides Manufacturing Industry issued by the Ministry vide G.S.R.446(E) dated 13th June 2011, as amended from time to time. The Compliance report is attached. Complied Attachment: Click to View
4	MISCELLANEOUS	No pesticides/chemicals banned by the Ministry of Agriculture and Farmers Welfare or having LD50 < 100 mg/kg shall be produced. Also, no raw material/solvent prohibited by the concerned Regulatory authorities from time to time, shall be used for	PPs Submission	The unit does not manufacture any pesticide technical banned by the Ministry of Agriculture and Farmers Welfare. The copy of commitment letter submitted to Ministry is attached. Complied Attachment: Click to View

		production of pesticides.			
5	AIR QUALITY MONITORING AND PRESERVATION	To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPC Guide lines.	<table border="1"> <tr> <td>PPs Submission</td> <td>Fugitive emission monitoring at work place environment, product, raw material storage area being carried out by QA Department. Detail analysis report of fugitive emission is enclosed. Complied Attachment: Click to View</td> </tr> </table>	PPs Submission	Fugitive emission monitoring at work place environment, product, raw material storage area being carried out by QA Department. Detail analysis report of fugitive emission is enclosed. Complied Attachment: Click to View
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6	MISCELLANEOUS	Solvent management shall be carried out as follows: (i) Reactor shall be connected to chilled brine condenser system. (ii) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (iii) The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery. (iv) Solvents shall be stored in a separate specified with all safety measures. (v) Proper earthing shall be provided in all the electrical equipment wherever solvent	<table border="1"> <tr> <td>PPs Submission</td> <td>The details report are attached. Complied Attachment: Click to View</td> </tr> </table>	PPs Submission	The details report are attached. Complied Attachment: Click to View
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		<p>handling is done. (vi) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (vii) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.</p>			
7	WATER QUALITY MONITORING AND PRESERVATION	<p>Total freshwater requirement shall not exceed 4757 cum/day to be met from GIDC water supply. Prior permission in this regard shall be obtained from the concerned regulatory authority.</p>	<table border="1"> <tr> <td>PPs Submission</td> <td> <p>The average water Consumption for the period of October-2023 to Marech-2024 is 452.86 KLD. The Water Consumption details is attached. Complied Attachment: Click to View</p> </td> </tr> </table>	PPs Submission	<p>The average water Consumption for the period of October-2023 to Marech-2024 is 452.86 KLD. The Water Consumption details is attached. Complied Attachment: Click to View</p>
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8	WASTE MANAGEMENT	<p>Effluent of 1273 cum/day shall be treated through Effluent Treatment Plant (ETP) having primary, secondary & tertiary treatment units and then taken Final Effluent Treatment Plant (FETP) operated by M/S Narmada Clean Tech (NCT) for further treatment and disposal. The project proponent will submit</p>	<table border="1"> <tr> <td>PPs Submission</td> <td> <p>The unit is maintaining Zero Liquid Discharge (ZLD) since July-2021 using Forward Osmosis (FO) system followed by evaporation system. The details report is attached. Complied Attachment: Click to View</p> </td> </tr> </table>	PPs Submission	<p>The unit is maintaining Zero Liquid Discharge (ZLD) since July-2021 using Forward Osmosis (FO) system followed by evaporation system. The details report is attached. Complied Attachment: Click to View</p>
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		<p>plan for achieving Zero Liquid Discharge with its techno- economic feasibility within 3 months from issue of this letter to the Ministry for further decision on the same.</p>		
9	WASTE MANAGEMENT	<p>In case, domestic waste-water generation is more than 10 cum/day, the industry may install Sewage Treatment Plant.</p>	PPs Submission	<p>The unit has installed STP of 100 KLD capacity to treat domestic waste water generated in the unit. The treated waste water from STP is recycled and reused in process/ utility /Gardening. The Sewage Treatment Plant flow diagram is attached. Complied Attachment: Click to View</p>
10	WASTE MANAGEMENT	<p>Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.</p>	PPs Submission	<p>The unit has separate drainage network for storm water to collect run off rain water and discharge through separate conveyance system to prevent mixing of any effluent /wastewater. Complied Attachment: NA</p>
11	WASTE MANAGEMENT	<p>Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm, and solvent transfer through pumps.</p>	PPs Submission	<p>The hazardous chemical handles in unit are being stored in tanks, tank farms. The unit has / will install flame arresters on all the tanks in the tank farm, and solvent transfer is done through pumps. The hazardous chemicals storage details are attached. Complied Attachment: Click to View</p>

12	WASTE MANAGEMENT	Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed of to the TSDF.	PPs Submission	The effluent with high organic load has been sent for incineration at BEIL and for co-processing to Cement Industry. The details of Waste Generation and Disposal are given in attachment. Complied Attachment: Click to View
13	WASTE MANAGEMENT	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act, 1989.	PPs Submission	The Compliance to MSIHC Rules 1989 and its amendments has been adhered by providing following facilities. 1) Fire Fighting Network as per Standards 2) PPE to All Workers 3) First Aid Measures 4) Occupational Health Centre and Availability of Doctor with nurse. 5) Ambulance in Place 6) Risk Assessment and Hazop Studies 7) On Site / Off site emergency Plan in Place & attached herewith 8) Periodic Mock Drills 9) Training and Awareness 10) Annual / Half Yearly Health Check Ups 11) Annual Safety Audits by Third Party and Submission of Compliance to Audit to DISH Office. Complied Attachment: Click to View
14	WASTE MANAGEMENT	The company shall undertake waste minimization measures as below: - (i) Metering and control of quantities of active ingredients to minimize waste. (ii) Reuse of by-products from the process as raw materials or as raw material substitutes in	PPs Submission	The detailed report is attached. Complied Attachment: Click to View

		<p>other processes. (iii) Use of automated filling to minimize spillage. (iv) Use of Close Feed system into batch reactors. (v) Venting equipment through vapour recovery system. (vi) Use of high-pressure hoses for equipment clearing to reduce wastewater generation.</p>			
15	GREENBELT	<p>The green belt of at least 5-10 m width shall be developed in more than 40% (in place of EAC recommended 33%) of the total project area, mainly along the plant periphery, in downward wind direction, and along roadsides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.</p>	<table border="1"> <tr> <td>PPs Submission</td> <td> <p>The unit was established in 1980-81 at notified industrial estate, GIDC, Ankleshwar. Till date 3.86 Hectore of factory area is developed as green belt as per CPCB Guidelines. The Map showing existing green belt area is attached. The company has developed in house nursery since 1993- 94 and donates 1000-2000 no of saplings without charges to surrounding area. The Unit has developed 1800 SqM Additional greenbelt at NHAI land adjacent to Unit.The unit has approached Western Railway division for additional 7000SqM area located adjacent northern boundary to company for conversion of rail sidings to green belt. The copy of NHAI Permission & Railway Approval letter is attached. Complied Attachment: Click to View</p> </td> </tr> </table>	PPs Submission	<p>The unit was established in 1980-81 at notified industrial estate, GIDC, Ankleshwar. Till date 3.86 Hectore of factory area is developed as green belt as per CPCB Guidelines. The Map showing existing green belt area is attached. The company has developed in house nursery since 1993- 94 and donates 1000-2000 no of saplings without charges to surrounding area. The Unit has developed 1800 SqM Additional greenbelt at NHAI land adjacent to Unit.The unit has approached Western Railway division for additional 7000SqM area located adjacent northern boundary to company for conversion of rail sidings to green belt. The copy of NHAI Permission & Railway Approval letter is attached. Complied Attachment: Click to View</p>
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16	GREENBELT	<p>In addition, the project proponent shall develop greenbelt outside the plant premises such as avenue plantation, plantation in vacant</p>	<table border="1"> <tr> <td>PPs Submission</td> <td> <p>The detailed report are attached. Complied Attachment: Click to View</p> </td> </tr> </table>	PPs Submission	<p>The detailed report are attached. Complied Attachment: Click to View</p>
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		areas, social forestry etc.		
17	Corporate Environmental Responsibility	At least 1.5% (2 times the amount recommended by the EAC) of the total project cost shall be allocated for Corporate Environment Responsibility (CER) and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office.	PPs Submission	Corporate Environment Responsibility (CER) details is attache. Complied Attachment: Click to View
18	Human Health Environment	Safety and visual reality training shall be provided to employees.	PPs Submission	The internal training on safety and health aspects of chemicals handling is imparted to all employees and workmen. The safety training details is attached. Complied Attachment: Click to View
19	Noise Monitoring & Prevention	For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	PPs Submission	The unit has installed three DG Sets with 1250 KVA and 910x2 KVA capacity which operates only in an emergency. The stack height is maintained as per CPCB Guidelines. Complied Attachment: NA
20	Risk Mitigation and Disaster Management	The unit shall make the arrangement for	PPs Submission	The fire extinguishers & fire hydrant system is installed & maintained as per the norms in manufacturing and non-

		<p>protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.</p>		<p>manufacturing areas. Onsite Emergency Plan is attached. Complied Attachment: Click to View</p>
21	Human Health Environment	<p>Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.</p>	PPs Submission	<p>Regular medical checkup of each employee has been conducted for Physical Examination, Hemoglobin, CBC, ESR, ECG, Complete Urine Examination, Liver Function, Kidney Function, Creatine, Blood Sugar, X Ray for Chest, sonography etc. The sample copy of Medical Report has been attached. Pre-employment medical checkup was done for all new joiners. The unit has provided in-plant clinic facility with resident doctor. The in- plant clinic is facilitated with latest medical equipment, antidots and essential medicines. The Medical record of all employees has been maintained and reviewed annually. Complied Attachment: Click to View</p>
22	AIR QUALITY MONITORING AND PRESERVATION	<p>Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera</p>	PPs Submission	<p>The screen short of OCEMS data transfer at CPCB and SPCB server are attached. Complied Attachment: Click to View</p>

		with night vision capability and flow meters in the channel/drain carrying effluent within the premises.			
23	Risk Mitigation and Disaster Management	Process safety and risk assessment studies shall be further carried out using advanced models, and the mitigating measures shall be undertaken accordingly.	<table border="1"> <tr> <td>PPs Submission</td> <td>We have completed 3D QRA Assessment Covering Hazards and Risk Assessment. The copy of Report is enclosed. Complied Attachment: Click to View</td> </tr> </table>	PPs Submission	We have completed 3D QRA Assessment Covering Hazards and Risk Assessment. The copy of Report is enclosed. Complied Attachment: Click to View
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General Conditions

Sr.No.	Condition Heading	Condition Details	Status of Compliance, Remarks/Reason and Supporting Documents		
1	Statutory compliance	The project authorities must strictly adhere to the stipulations made by the state Pollution Control Board (SPCB), State Government and/or any other statutory authority.	<table border="1"> <tr> <td>PPs Submission</td> <td>We are complying all conditions/stipulation made by GPCB in CTE/CTO. The compliance to Consent granted by GPCB is attached. Complied Attachment: Click to View</td> </tr> </table>	PPs Submission	We are complying all conditions/stipulation made by GPCB in CTE/CTO. The compliance to Consent granted by GPCB is attached. Complied Attachment: Click to View
PPs Submission	We are complying all conditions/stipulation made by GPCB in CTE/CTO. The compliance to Consent granted by GPCB is attached. Complied Attachment: Click to View				
2	Statutory compliance	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change. In case of deviations or alterations in the project proposal from those submitted to this Ministry for	<table border="1"> <tr> <td>PPs Submission</td> <td>The unit has obtained Expansion of Environmental Clearance from MOEF in year 2019 and Amendment to EC in year 2020 and also we have obtained Valid CC&A from GPCB vide letter No- AH-131419 dated 20.02.2024 valid upto 19.11.2024. Complied Attachment: NA</td> </tr> </table>	PPs Submission	The unit has obtained Expansion of Environmental Clearance from MOEF in year 2019 and Amendment to EC in year 2020 and also we have obtained Valid CC&A from GPCB vide letter No- AH-131419 dated 20.02.2024 valid upto 19.11.2024. Complied Attachment: NA
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		clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.		
3	AIR QUALITY MONITORING AND PRESERVATION	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one stations each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.	PPs Submission	The Ambient Air Quality Monitoring is conducted by internal and external Agency on monthly basis at outside the plant area covering up wind and down wind directions. The summery of Monitoring report is attached. Complied Attachment: Click to View
4	AIR QUALITY MONITORING AND PRESERVATION	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November 2009 shall be complied with.	PPs Submission	We are/will comply to National Ambient Air Quality Emission Standards for Manufacturing Industry issued by the Ministry. The summery of Ambient Air Quality Monitoring Report is attached. Complied Attachment: Click to View
5	Noise Monitoring & Prevention	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under	PPs Submission	The noise monitoring at plant areas has been regularly conducted by External laboratory. The Noise level in the unit conforms to the stipulated standards. The Summery of Noise monitoring report is attached. Complied Attachment: Click to View

		Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (nighttime)		
6	WATER QUALITY MONITORING AND PRESERVATION	The Company shall harvest rainwater from the roof tops of the buildings to recharge ground water, and to utilize the same for different industrial operations within the plant.	PPs Submission	The unit has implemented rain water harvesting at Admin Building, Canteen R&D and QA & QC Buildings as per action plan submitted to MoEF&CC. The more details is attached. Complied Attachment: Click to View
7	Human Health Environment	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis.	PPs Submission	The internal training on safety and health aspects of chemicals handling is imparted to all employees and workmen. The safety training details is attached. Complied Attachment: Click to View
8	MISCELLANEOUS	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, risk mitigation measures and public hearing shall be implemented.	PPs Submission	The company has started implementation of granted environmental clearance with commitment for implementation of all recommendations given under EIA/EMP. The copy of EMP is enclosed. Complied Attachment: Click to View
9	MISCELLANEOUS	The company shall undertake all measures for improving socio-economic conditions of	PPs Submission	The unit has started all measures to improve socio economic conditions of the surrounding area by local villagers and other stake holders. The copy of

		the surrounding area. CSR activities shall be undertaken by involving local villagers, administration and other stake holders. Also, eco-developmental measures shall be undertaken for overall improvement of the environment.		Annual CSR Report is available on company portal. Complied Attachment: Click to View
10	Statutory compliance	A separate Environmental Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.	PPs Submission	<ul style="list-style-type: none"> Internal Environment management cell comprising of Unit Head, plant Head, SHE Head & Corporate Environment head is in operation for close monitoring. The environment cell verifies environmental performance and involves in environmental audit. Stack Monitoring, Ambient Air Monitoring, Solid Waste Analysis is being done by third party (BEIL Infrastructure Ltd) while Bioassay Test, Toxicity Factor test, Fugitive Emission, VOC Monitoring, Noise Level Monitoring are carried out by our internal laboratory. The analysis of effluent is done in our full-fledged internal laboratory Complied Attachment: Click to View
11	Statutory compliance	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated	PPs Submission	The year wise details of environmental expenditures is attached. Complied Attachment: Click to View

		herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.		
12	Statutory compliance	A copy of the clearance letter shall be sent by the project proponent to concern Panchayat, Zila Parishad/ Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal.	PPs Submission	We have submitted copy of Environmental Clearance letter to concerned local authorities. The Acknowledged Copy of Submission of EC to local bodies is enclosed. Complied Attachment: Click to View
13	Statutory compliance	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal office of CPCB and SPCB. A copy of Environmental Clearance and six-monthly compliance status report shall be posted on the web site of the company.	PPs Submission	The detailed report is attached. Complied Attachment: Click to View
14	MISCELLANEOUS	"The project proponent shall inform the public that the project has been accorded environmental clearance by	PPs Submission	The unit has published advertisement on grant of EC by MoEF&CC in English & local newspapers.1. Gujarati – DivyaBhaskar dated: 06.12.2019 2.English

		<p>the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry at http://moef.nic.in. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional office of the Ministry."</p>		<p>–dated 06.12.2019 The copy is attached. Complied Attachment: Click to View</p>
15	MISCELLANEOUS	<p>The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional offices of MoEF&CC by e-mail.</p>	PPs Submission	<p>The unit submits environmental statement for each financial year in Form-V to State Pollution Control Board. The acknowledgement Copy of latest Environmental Statement Submitted to SPCB is enclosed. Complied Attachment: Click to View</p>

Last Site Visit Report (if available) NA

Last Site Visit Report Date (if available)

Additional Attachment (if any) NA

Additional Remarks (if any)

I 'M/s UPL Limited' hereby give undertaking that the data and information given in the filed compliance and enclosures are true to be best of my knowledge and belief and I am aware that if any part of the data and information found to be false or misleading at any stage, the clearance given to the project will be revoked at our risk and cost. In addition to above, I hereby give undertaking that no activity such as change in project layout, construction, expansion, etc. has been taken up without due approval.

Cover Letter From RO/SRO

Cover Letter From RO/SRO NA

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