DCM Shriram Limited

(Unit: Shriram Alkali and Chemicals, Jhagadia)

SIX MONTHLY ENVIRONMENT CLEARANCE COMPLIANCE REPORT

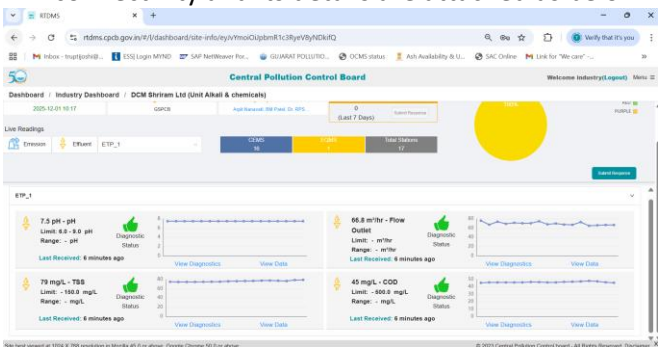
For the period of April'25 to September'25

[Letter no. SEIAA/GUJ/EC/5(f)/1597/2022 dated 31st May-2022]

<table>
<tr><th>S. no.</th><th>CONDITIONS/RECOMMENDATION</th><th>STATUS</th></tr>
<tr><td></td><td>The proposal is for environment Clearance to M/s. DCM Shriram Ltd. (Unit: Shriram Alkali & Chemicals) for setting up manufacturing plant of 'Synthetic organic Chemicals' at Plot No. 749, GIDC Jhagadia, Taluka: Jhagadia, District: Bharuch. It is an existing unit for manufacturing following products, which falls in the category - 5(f) of the schedule of the EIA Notiflcation-2006:
<table>
<tr><th>Sr. No.</th><th>Product</th><th>Existing MT/M</th><th>Proposed MT/M</th><th>Total MT/M</th></tr>
<tr><td>1</td><td>Caustic soda (Lye & Flakes)</td><td>67,750</td><td>0</td><td>67,750</td></tr>
<tr><td>2</td><td>Chlorine</td><td>59,641</td><td>0</td><td>59,641</td></tr>
<tr><td>3</td><td>Hydrochloric Acid (100 %) On 33% basis</td><td>13,042= 39,520</td><td>0</td><td>13,042= 39,520</td></tr>
<tr><td>4</td><td>Hydrogen</td><td>1,806</td><td>0</td><td>1,806</td></tr>
<tr><td>5</td><td>Sodium hypo chlorite</td><td>3,249</td><td>0</td><td>3,249</td></tr>
<tr><td>6</td><td>CPP from coal based power plant(122MW)</td><td>242 MWh</td><td>0</td><td>242 MWh</td></tr>
<tr><td>7</td><td>Steam for CPP</td><td>84,187</td><td>0</td><td>84,187</td></tr>
<tr><td>8</td><td>Epichlorohydrin (ECH)</td><td>0</td><td>5,125</td><td>5,125</td></tr>
<tr><td>9</td><td>Purified / Refined Glycerine</td><td>0</td><td>10,500</td><td>10,500</td></tr>
<tr><td colspan="5">Products not requiring EC</td></tr>
<tr><td>10</td><td>Aluminium chloride</td><td>4833</td><td>0</td><td>4833</td></tr>
<tr><td>11</td><td>Glauber Salt (ANSS)</td><td>625</td><td>0</td><td>625</td></tr>
<tr><td>12</td><td>Hydrogen peroxide (100%)</td><td>0</td><td>5500</td><td>5500</td></tr>
</table></td><td>Complied.

The manufacturing of each product is maintained within the environment clearance quantity. Moreover, we have also submitted the month wise production data to GPCB as required. Details of production for last 06 months are tabulated as below:
<table>
<tr><th>Sr. No.</th><th>Product</th><th>April'25 to Sept'25 (Quantity In MT)</th></tr>
<tr><td>1</td><td>Caustic soda (Lye & Flakes)</td><td>318407</td></tr>
<tr><td>2</td><td>Chlorine</td><td>285278</td></tr>
<tr><td>3</td><td>Hydrochloric Acid (100 %) On 33% basis</td><td>67198 (100%)/ 203631 (33%)</td></tr>
<tr><td>4</td><td>Hydrogen</td><td>6882</td></tr>
<tr><td>5</td><td>Sodium hypo chlorite</td><td>1898</td></tr>
<tr><td>6</td><td>CPP from coal based power plant(122MW)</td><td>148 MWh</td></tr>
<tr><td>7</td><td>Steam from CPP</td><td>163250</td></tr>
<tr><td>8</td><td>Epichlorohydrin (ECH)</td><td>1597</td></tr>
<tr><td>9</td><td>Purified / Refined Glycerine</td><td>11521</td></tr>
<tr><td>10</td><td>Aluminium chloride</td><td>27216</td></tr>
<tr><td>11</td><td>Glauber Salt (ANSS)</td><td>118</td></tr>
<tr><td>12</td><td>Hydrogen peroxide (100%)</td><td>16148</td></tr>
</table></td></tr>
<tr><td>A</td><td colspan="2">Conditions</td></tr>
<tr><td></td><td colspan="2">A.1 : Specific Condition:</td></tr>
<tr><td>1</td><td>Unit shall install CEMS [Continuous Emission Monitoring System] in line to CPCB directions to all SPCB vide letter no. B- 29016/04/06 PCI-1/5401 dated 05/02/2014 for effluent discharge and air emission as</td><td>Complied.
In our plant, CEMS for all applicable parameters is already installed at all process and flue gas stacks and</td></tr>
</table>

	per pollutants discharge/ emission from respective project and an arrangement shall also be done for reflecting the online monitoring results on the company's server which can be assessable by the GPCB/CPCB on real time basis. [For Small/Large/Medium (Red Category) & Whichever, (Air emission & Effluent discharge) is applicable].	the results are communicated to CPCB and GPCB servers on real-time basis. We have also updated our all the analyser station and device on new ODAMS portal as per CPCB circular within its due date. CEMS connectivity details is attached as ***Annexure-1***  Sample CEMS analyzer
2	Close loop solvent recovery system with adequate condenser system shall be provided to recover solvent vapors in such manner that recovery shall be maximum and recovered solvent shall be reused in the process within premises.	Complied. We have provided close loop solvent recovery system in our H2O2 plant in line with this requirement. 3-bed of Solvent recovery unit is already installed and operated for maximum recovery. Recovered solvent is completely reused within the process of H2O2 manufacturing.
3	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR Logbooks shall be maintained.	Complied Preventive maintenance schedule is in place for block valve, Control valve, Pressure relief device, pump seal, compressor seal and maintenance has been done as per schedule. All Critical valves are checked once in a year & records of the same are maintained.
4	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.	Complied. We are complying with the ambient air monitoring standards at our site as required. The sample report is attached as ***Annexure-2*** for your reference and same is submitted to GPCB on monthly basis.
5	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G. S. R. 608 (E) dated 21/07/2010 and amended from time to time shall be followed.	Complied. At our plant, AAQ monitoring is carried out once in a month. Monitoring and testing is carried out by GPCB and MoEF & NABL approved laboratory Unistar Environment and Research Labs Pvt. Ltd. Vapi. sample report is attached as ***Annexure-2.***

6	Unit shall have to adhere to the prevailing area specific policies of GPCB with respect to the discharge of pollutants, and shall carry out the project development in accordance & consistence with the same.	Complied. We have provided continuous online monitoring system at the outlet of the ETP system and record is maintained. Online flow meter, pH, TSS & COD analyzers have been provided in Effluent discharge line. Ammonia is not used in manufacturing, hence TKN analyzer is not applicable to us. The online data is monitored & transmitted to CPCB & GPCB server, as per the requirement. Further, we are in process with relocation of our treated effluent discharge point, connected with Narmada Clean Tech (NCT) effluent discharge above ground line as a part of our CCA amendment. Same is intimate to NCT as ***Annexure-3*****.** ETP connectivity and its details are attached as below:   Effluent discharge flow meter
7	All measures shall be taken to avoid soil and ground water contamination within premises.	Complied All roads and working areas are either of RCC or asphalt covered to make it impervious in order to prevent soil contamination. All the work areas, storage areas are of RCC. Waste storage areas are also covered as per standard guidelines so as to prevent soil contamination. Acid / alkali proof bricks provided at HCL plant & Caustic concentration unit. A reference photograph of the same is shown below:

<table>
<tr><td></td><td></td><td> 
Any civil activity occurring due to project activities is covered with pucca floor only.</td></tr>
<tr><td>8</td><td colspan="2">Safety & health</td></tr>
<tr><td>a</td><td>PP shall obtain PESO permission for the storage and handling of hazardous chemicals.</td><td>Complied
We have obtained necessary approvals from GPCB, DISH, CCE, etc. to operate the facilities in the plant.
Copy of PESO license is attached as Annexure-4.

<table>
<tr><th>License & Authority</th><th>Reference No.</th><th>Valid up to</th></tr>
<tr><td>Factory License from DISH</td><td>24315</td><td>31.12.2026</td></tr>
</table>

Licenses issued by PESO
<table>
<tr><th>Name of the Chemical</th><th>Type of Storage</th><th>Quantity</th><th>Nos. of Storage</th><th>License No.</th><th>Valid up to</th></tr>
<tr><td>Chlorine</td><td>Cylinders</td><td>-</td><td>2016 Nos.</td><td>G/HO/GJ/06/191 (G1346)</td><td>30.09.33</td></tr>
<tr><td>Chlorine</td><td>Storage tanks</td><td>492.5 MT</td><td>05 tanks</td><td>S/HO/GJ/03/320 (S 1605)</td><td>30.09.28</td></tr>
<tr><td>Hydrogen</td><td>Filling
Cylinders</td><td>-
-</td><td>-
1528 Nos</td><td>G/HO/GJ/05/350, G/HO/GJ/06/335 (G1545)</td><td>30.09.36</td></tr>
<tr><td>Petroleum-Class-B</td><td>Tanks</td><td>800 KL
26 KL</td><td>01 tank</td><td rowspan="2">P/HQ/GJ/15/1740 (P12101)</td><td rowspan="2">31.12.2032</td></tr>
<tr><td>Class-C</td><td>Tanks</td><td>270 KL</td><td>01 Tank</td></tr>
</table>
</td></tr>
</table>

b	PP shall provide Occupational Health Centre OHC) as per the provisions under the Gujarat Factories Rule 68-U.	Complied. We have well established provide Occupational Health Centre OHC) as per requirement. Moreover, we are maintaining Pre and Periodic medical examination record for all workers as prescribed in Factories act. Sample of Form no-32 is attached as ***Annexure-5*** Copy of drawing approval letter from DISH is attached as ***Annexure-6.***
c	PP shall obtain fire safety certificate / Fire No-Objection certificate (NOC) from the concern authority as per the prevailing Rules / Gujarat Fire Prevention and Life Safety Measures Act, 2016.	Complied. We are covered under the factory act and it is not applicable to us. However, application for fire NOC from NAO is submitted vide letter dated ***Annexure-7.***
d	Unit shall adopt functional operations/process automation system including emergency response to eliminate risk associated with the hazardous processes.	Complied. Necessary engineering control have been provided, PPE's are used by the person handling the chemical and Unit has On site Emergency plan with defined roles and responsibility to handle incidents & accidents. In view of the expanded capacity of caustic soda plant and other new plants commissioning, the onsite emergency plan was revised in April-2025 (***Annexure-8***) to captured existing and new emergency scenarios; the periodic mock drills are carried out. • Hydrogen (54 Nos.), Chlorine (83 nos.) and ECH (20 nos.) sensors with alarm installed at plant area and monitoring done through DCS. Sample calibration report of sensors is attached as ***Annexure-9.*** • All Chlorine system connected to vacuum & diverted to the neutralization system. Waste Chlorine is absorbed in Dilute sodium hypochlorite solution and Sodium Hypo is produced • Effective water spraying done on chlorine storage tank. • Non sparking tools used for hydrogen compressor, flammable material handling area • Well-designed Fire hydrant system with stand-by pump facility and reservoir. • Two fire tenders with well-trained firefighting staff to control fire. One was recently introduced.

		 • We have also installed different types of fire extinguishers at strategic locations as per standards. • Fire hydrant system is expanded to fulfil the additional safety requirement of expanded capacity for caustic soda plant as well as hydrogen peroxide and epichlorohydrin plant. • Water sprinkler system has been provided in areas such as coal conveyor, chemical storage, hydrogen handling reactor in H2O2 plant, etc. 
e	PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident.	Complied. The Onsite emergency plan ***(Annexure-8)*** is in place with defined roles and responsibilities to handle incidents & accidents and periodic mock drills are carried out as per the requirement. In view of the expanded capacity of caustic soda plant and other new plants commissioning, the onsite emergency plan was revised in APRIL-2025 to captured existing and new emergency scenarios. The last mock drill was conducted in 13th May-2025. We have provided separate entry and exit gates clearly marked within the facility and 7 nos. of assembly points are earmarked and displayed for guidance in case of any evacuation requirement.

		All the Internal roads are sufficiently wide for movement of emergency vehicles.
f	PP shall install adequate fire hydrant system with foam trolley attachment within premises and separate storage of water for the same shall be ensured by PP.	Complied We already has well laid fire hydrant network & separate water storage in the premises. It is already expanded for new plants.
g	PP shall take all the necessary steps for control of storage hazards within premises ensuring incompatibility of storage raw material and ensure the storage keeping safe distance as per the prevailing guidelines of the concerned authority.	Noted & complied. We have provided separate storage area along with dyke walls for raw material as per their compatibility. All chemicals are used and stored for manufacturing of H2O2 and ECH are kept in a separate tank with MOC as required. Dyke wall are constructed for maintaining the safety in storage of all chemicals as per the their compatibility. Volume storage along with dyke wall capacity.
h	PP shall take all the necessary steps for human safety within premises to ensure that no any harm is caused to any worker/employee or labour within premises.	Complied. All safety requirements are clearly defined for human safety within the premises. Required training, PPEs, safety control systems and audits are ensured for the same.
i	Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.	Complied. Areas requiring flame proof fittings are provided accordingly.
j	Unit shall never store drum/barrels/carboys of incompatible material/chemical together.	Complied. Incompatible material/chemicals are stored separately. 

		
k	Unit shall provide effective fire hydrants, water monitors & foam application system at solvent storage area and unit shall provide adequate safety system such as water sprinklers, water curtains, foam pouring system etc. to restrict cascade fire emergency in solvent storage area.	Complied. • Fire hydrant system is expanded to fulfil the additional safety requirement of expanded capacity for caustic soda plant as well as hydrogen peroxide and epichlorohydrin plant. • Effective water spraying done on chlorine storage tank, coal conveyors, aromatic chemical storage, hydrogen handling reactor in H2O2 plant, etc. • Well designed Fire hydrant system with stand-by pump facility and water reservoir is in placed. • Two fire tenders with well-trained firefighting staff to control fire. One was recently introduced.  • We have also installed different types of fire extinguishers at strategic locations as per standards. The same will be continued in the upcoming new plant.
l	Unit shall provide effective Isolation for Process area and storage of hazardous chemicals.	Complied. We have provided the necessary safety systems and interlocks at process area and storage of hazardous chemicals.
m	Unit shall provide all safety controls (including DCS) for Epichlorohydrin Handling during production, handling, storage & transportation. Necessary Safety	Complied. We have implemented DCS with closed handing system for Epichlorohydrin during production, handling,

	requirements like interlock system etc. shall be designed to take care control of any situation including plant shutdown.	storage & transportation in addition to other safety control measures such as various interlocks system including safe shutdown.
n	Unit shall install adequate number of chlorine sensors in manufacturing plant area for detection of "Chlorinated compound" when ECH decompose in atmosphere and Alarm will be provided to alert the Shift In charge to take corrective measures if any leakage of Epichlorohydrin (a Chlorinated compound) in atmosphere from plant as per assurance given to SEAC.	Complied. 79 Chlorine sensors have been installed for work place chlorine monitoring at strategic places in factory with display and alarm indication at DCS in existing plant. Sample calibration report of sensors is attached as ***Annexure-9.*** In ECH, 4 nos. of Chlorine, 20 nos. of ECH and 5 nos. of HCL gas detectors are installed for chlorinated compound detection. Alarms are displayed at DCS control room.  Chlorine Sensor
o	The unit shall implement various risk mitigation measures mentioned in EIA report prepared by Kadam Environmental Consultants.	Complied. All required actions are being taken for risk mitigation in line with the EIA report.
p	The unit shall follow Standard operating procedure (SOP) for storage and handling of Epichlorohydrin and such Hazardous chemicals and implement all safety details and control measures. The unit shall develop additional SOPs if required.	Complied. We have prepared Standard operating procedure (SOP) for storage and handling of Epichlorohydrin and other hazardous chemicals. Also implemented various control measures for safe handling and storage and tanker filling of ECH. We have well-defined structure of Integrated Management System. All the SOP's and work instructions are the part of Integrated Management System under ISO 9001, ISO 14001, ISO 45001, ISO 50001. IMS certificate and steam supply certificate with valid certificate till 15.03.2026. **Annexure-10**.
A.2	**Water**	
9	Total water requirement for the project shall not exceed 26500 KLD. Unit shall recycle a total of 2000 KLD cooling tower blow down water in existing & proposed cooling towers. Hence, fresh water	Complied. Our average water consumption for last 6 months is around 15950 KLD. Thus, we are not exceeding the total water requirements as recommended. Month wise

<table>
<tr><td></td><td>requirement shall not exceed 26500 KLD and it shall be met through GIDC supply only. Prior permission from concerned authority shall be obtained for withdrawal of water.</td><td>detail is already submitted to GPCB on monthly and quarterly basis as per requirement.
<table>
<tr><th>Month</th><th>Water consumption (KL)</th></tr>
<tr><td>APRIL’25</td><td>505856</td></tr>
<tr><td>MAY’25</td><td>480236</td></tr>
<tr><td>JUNE’25</td><td>479502</td></tr>
<tr><td>JULY’25</td><td>505432</td></tr>
<tr><td>AUG’25</td><td>461616</td></tr>
<tr><td>SEPT’25</td><td>478328</td></tr>
<tr><td>Average KLD</td><td>15950</td></tr>
</table></td></tr>
<tr><td>10</td><td>The unit shall install latest technology cooling tower for further minimizing evaporation & drift losses in captive power plant and cooling tower as per commitment given to SEAC.</td><td>Complied.
Our captive powerplant is designed & operated with drift loss of 0.01% against the industry norm of 0.05%. Also, the fresh water is reduced through increasing CoC of cooling tower (upto 10) as well as recycling of permeate through dedicated RO.</td></tr>
<tr><td>11</td><td colspan="2">Management of Industrial effluent shall be as under:</td></tr>
<tr><td>a</td><td colspan="2">Stream A: Refined Glycerin, ECH Plant</td></tr>
<tr><td></td><td>325 KLD, organic industrial effluent shall be treated in in-house biological effluent treatment plant. The units of this ETP comprise of Oil & Grease Tank, Equalization Tanks, Flash Mixer, Flocculator, Primary Tube Settler Tank, Aeration Tank - I, 1st Stage Secondary Tube Settler Tank, Aeration Tank - II, Final Tube Settler Tank, Intermediate Collection Tank, Pressure Sand Filter, Activated Carbon Filter, Sludge Collection Sump, Leachate Collection Sump, Treated Water Tank.</td><td>Complied.
We have constructed a new Effluent treatment plant as required. This ETP comprises of Primary, secondary and tertiary treatment facilities as required. This ETP is commissioned and organic effluent from ECH plant is taken care under this ETP.
Detail along with photographs of ETP are attached as Annexure-11.</td></tr>
<tr><td></td><td>The treated effluent from outlet of this plant shall be taken to In-house ETP / RO Plant / MEE plant / ATFD plant.</td><td>Complied. ETP is designed to meet with the treated effluent norms as required as explained above. Detail along with photographs of ETP are attached as Annexure-11.</td></tr>
<tr><td></td><td>Unit shall feed wastewater to in-house MEE only after ensuring content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no adverse impacts on Environment and Human Health.</td><td>Complied. ETP is designed to meet with the treated effluent norms as required as explained above. Detail along with photographs of ETP are attached as Annexure-11.
System is well designed to recover all volatile organic and send to waste incineration plant. MEE is installed for treatment of effluent and quality will be monitored as required to avoid any COD/VOC during evaporation.</td></tr>
</table>

b	**Stream B: H2O2 and Other Utilities Blow downs/Back washes :**	
	Inorganic industrial effluent (Max 759 KLD) from process generated from H2O2 plant, other utilities blow downs / back washes, shall be taken to in-house ETP / RO Plant / MEE plant / ATFD plant.	Complied. ETP is designed to meet with the treated effluent norms as required as explained above. Detail along with photographs of ETP are attached as ***Annexure-11.***
	Treated waste water shall be sent to NCT only after complying with the inlet norms of NCT prescribed by GPCB to ensure no adverse impact on Human Health and Environment.	Complied. Effluent discharge into Narmada Clean Tech (NCT) pipeline of Jhagadia GIDC for final disposal into deep sea after meeting deep sea discharge norm as per attached ***Annexure-12.*** It shows the revised discharged norms prescribed by GPCB vide letter dated 16.10.2023. Further, we are in process with relocation of our treated effluent discharge point, connected with Narmada Clean Tech (NCT) effluent discharge above ground line as a part of our new ETP commissioning. A acknowledge copy is attached as ***Annexure-3*****.**
12	The total additional industrial effluent from both (1084 KLD) from proposed project shall be treated in effluent treatment plant / RO / MEE / ATFD plant thereby achieving Zero Liquid Discharge (ZLD). There will be no additional effluent discharged in NCT pipeline due to the proposed project	Complied We have constructed a new Effluent treatment plant as required. This ETP comprises of Primary, secondary and tertiary treatment facilities as required· Detail along with photographs of ETP are attached as ***Annexure-11.*** The quality and quantity of all effluent streams are treated and recovered through RO plant for large extend before discharging into NCT pipeline after meeting with the GPCB norms.
13	Unit shall discharge wastewater to NCT pipeline only after complying with inlet norms prescribed by GPCB and ensuring content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no adverse impacts on Environment and Human Health.	Complied as explained above.
14	The total Domestic wastewater generation shall not exceed 80 KL/day and it shall be treated STP & treated domestic wastewater will be reused in flushing, greenbelt / gardening & irrigation purpose within premises.	Complied. Separate modular Sewage treatment plants (4 Nos.) are installed for domestic wastewater treatment, treated sewage is being reused in greenbelt development within premises. Detail of STP is attached as ***Annexure-13***

		 **Sewage Treatment Plant**
15	Total effluent discharged from project will be reduced to 1607 KLD and will not exceed maximum permitted quantity of 1800 KLD as per commitments to SEAC during presentation.	Complied Currently the total effluent discharged from existing plant is 1394 KLD which is well with the GPCB permissible limit of GPCB.
16	The unit shall provide metering facility at the inlet and outlet of ETPs and maintain records for the same.	Complied All required metering facilities are provided in existing plant and the results are communicated to CPCB and GPCB servers on real-time basis. Similar set-up is installed for new ETP. Calibration of GIDC water meter and effluent discharge meter is maintained time to time.  GIDC water meter  Effluent discharge meter
17	Proper logbooks of ETP; reuse/ recycle of treated/ untreated effluent; chemical consumption in effluent treatment; quantity & quality of treated effluent;	Complied Logbook for ETP operation is maintained as required. Record of Electricity consumption for ETP is maintained as required.

	power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time.	Monthly data of Production, Power consumption, ETP discharge etc. is uploaded in XGN and hard copy also submitted to GPCB. We have engaged QCI-NABET accredited and MoEF approved laboratory M/S Unistar Environment and Research Labs Pvt. Ltd. Vapi for monitoring of environmental performance and reports are submitted to GPCB on monthly basis. Sample report of analysis results of the treated effluent is attached is attached **as *Annexure-14.***
18	Unit shall not exceed fuel consumption for Boiler, Heater, Incinerator and DG Set as mentioned.	Complied. Fuel consumption is well within the prescribed limits. Details are submitted to GPCB on monthly and quarterly basis as per requirement. We are using Hydrogen gas/ Natural Gas as alternate fuel in the Flaker plant and boiler as green fuel. We have provided the APCMs in all process & flue gas stacks and their performance is being monitored and shared to CPCB /GPCB on real time basis.
19	Unit shall provide adequate APCM with flue gas generation sources to achieve the norms prescribed by GPCB.	Complied as per condition S.N#18 of SEIAA/GUJ/EC/5(f)/1597/2022 dated 31st May-2022
20	Unit shall provide adequate APCM with process gas generation sources as mentioned.	Complied as per condition S.N#18 of SEIAA/GUJ/EC/5(f)/1597/2022 dated 31st May-2022
21	PP shall use approved fuels only as fuel in boilers.	Complied. We are utilizing approved fuels (Blended coal, Lean Gas, HSD) only as prescribe in our valid CCA.
22	The fugitive emission in the work zone environment shall be monitored. The emission shall conform to the standards prescribed by the concerned authorities from time to time (e.g. Directors of Industrial Safety & Health) Following indicative guidelines shall also be followed to reduce the fugitive emission.	Complied Fugitive emission monitoring at work place is carried out once in a month. Under the Gujarat Factory Rule 12-B form no. 37 is maintained. Sample copy is attached as ***Annexure-15***.
a	Internal roads shall be either concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement.	Complied All roads and working areas are either of RCC or asphalt covered to make it impervious in order to reduce the fugitive emission during vehicular movement.
b	Air borne dust shall be controlled with water sprinklers at suitable locations in the plant.	Complied We have installed water sprinklers system at suitable locations in the plant. Also vacuum dust collection machine is used for cleaning of the road.

		  Vacuum cleaner for road cleaning  Water sprinkler system
c	A green belt shall be developed all around the plant boundary and also along the roads to mitigate fugitive & transport dust emission.	Complied Greenbelt has already been developed at site and in GIDC land adjacent to the boundary to mitigate the effect of fugitive emission all around the plant. We have further expanded the greenbelt in GIDC estate and have planted in GIDC area close to our boundary. Green belt details is attached as ***Annexure-16***.
23	Regular monitoring of Volatile Organic Compounds (VOCs) shall be carried out in the work zone area and ambient air	Complied. VOC monitoring is being carried out on regular basis to monitor the VOCs in work zone area & ambient air and record is maintained. Copy is attached as ***Annexure-15***
24	**For control of fugitive emission, VOCs, following steps shall be followed:**	

a	Closed handling and charging system shall be provided for chemicals.	Complied. We have provided closed handing & charging systems for chemicals in H2O2 & ECH plants as explained above.
b	Reflux condenser shall be provided over Reactors / Vessels.	Reflux condensers are provided over the vents of Reactors / Vessels in ECH & H2O2 plant.
c	Pumps shall be provided with mechanical seals to prevent leakages.	Complied. Chemical transferring pumps are provided with mechanical seal. 
d	Air borne dust at all transfers operations/ points shall be controlled either by spraying water or providing enclosures.	Complied. We have installed water sprinklers system at suitable locations in the plant. Also vacuum dust collection machine is used for cleaning of the road.   Vacuum cleaner for road cleaning

		 Water sprinkler system
25	**Solvent management shall be carried out as follows:**	
a	Measures shall be taken to reduce the process vapors emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapour recovery system.	Complied. We have installed solvent recovery system and closed loop for handing & charging of solvents & chemicals to reduce the proves vapors. All venting equipment are provided with vents of reactors and vessels to vapour recovery system. There is no toxic solvent used in our Plant.  solvent recovery system
b	Reactor shall be connected to adequate chilling system to condensate solvent vapors and reduce solvent losses	Complied. Reactor of ECH & H2O2 plant are connected to adequate chilling system to condensate solvent vapors/organic vapours and reduce solvent losses.
c	Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	Complied. All reactors & solvent handling pumps are provided with mechanical seal to prevent any leakages. 

d	The condensers shall be provided with sufficient HTA and residence time so as to achieve maximum solvent recovery.	Complied. All condensers are designed and installed to ensure sufficient HTA and residence time which is providing us maximum solvent recovery.
e	Solvents shall be stored in a separate space specified with all safety measures.	Complied. We have provided separate storage yard for solvents with all relevant safety measures. Specific safety measures are also taken up for storage.
f	Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	Complied. Provision of earthing is provided for all the electrical equipment where solvent handling is done.
g	Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	Complied. All flame proof fittings are provided at solvent storage & handling area. Solvent tank and ECH storage tank are provided with breather valve.
26	Regular monitoring of ground level concentration of PM10, PM2.5, SOx, NOx, CI2, HCI and HC 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 control measures shall be taken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.	Complied, AAQ monitoring is carried out once in a month. Monitoring and testing is carried out by GPCB and MoEF approved laboratory Unistar Environment and Research Labs Pvt. Ltd. Vapi. Ambient air quality results are well within standard prescribed limits. Sample copy of report is attached as ***Annexure-02.***
A.4	**Solid / Hazardous waste**	
27	All the hazardous/ solid waste management shall be taken care as mentioned.	Complied We are complying to the Hazardous waste management and handling rules 2016 as amended. We are complying with the requirements of combined consent and Authorization (CC&A) from GPCB for collection/ treatment / storage disposal of hazardous waste
28	Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.	Complied. We are complying with the Hazardous waste management and handling rules 2016 as amended. Sample copy of MOU is attached as ***Annexure-17.***
29	Unit shall explore the possibilities for environment friendly methods like co-processing of hazardous waste for disposal of Incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.	Noted. Fly ash is completely reused in cement, RMC and brick manufacturing etc. In addition to that, we are sending glycerin pitches - hazardous waste for pre-processing at M/s. ANAS GREEN. Also, we are exploring the possibilities of co-

<table>
<tr><td></td><td></td><td>processing of other hazardous wastes. Copy of NOC for co-processing of waste is attached as Annexure-18.</td></tr>
<tr><td>30</td><td>The project proponent has to obtain membership of TSDF site & CHWIF before obtaining CTO of GPCB.</td><td>Complied. We have obtained the memberships as required. Copy of membership is attached as Annexure-19.</td></tr>
<tr><td>31</td><td>The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.</td><td>Complied,
We are selling Dilute sulfuric acid (listed as hazardous waste) to authorized end users only. As per Rule-9, MoU done with authorize end users with proper manifest system as per the requirement. Sample copy of MOU is attached as Annexure-17.</td></tr>
<tr><td>A.5</td><td colspan="2">OTHER</td></tr>
<tr><td>32</td><td>The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.</td><td>Complied. Same as above</td></tr>
<tr><td>A</td><td colspan="2">Environment Infrastructure Development:</td></tr>
<tr><td>1</td><td>Repairing & Desilting of existing check dams; Construction of new check dams at Boridra DU, Fulwadi, Selod villages.</td><td>Complied.
We had conducted a baseline study by BISLD and as per findings and community requirements, interventions have been identified jointly with Village Panchayat and community.
Last half-yearly detail (April’25 to Sept’25) is as mentioned below:
<table>
<tr><th>Sr. No.</th><th>Village</th><th>Activity</th><th>Water Conservation (Cr. Ltr)</th></tr>
<tr><td>1</td><td>Sanjali</td><td>Pond Desilting</td><td>2,81,27,640</td></tr>
<tr><td>2</td><td>Vadhvana</td><td>Pond Desilting</td><td>2,80,38,200</td></tr>
<tr><td>3</td><td>Talodra navinagri</td><td>Pond Desilting</td><td>3,02,59,680</td></tr>
<tr><td>4</td><td>Talodra Bharuchiamba</td><td>Pond Desilting</td><td>5,06,38,980</td></tr>
<tr><td>5</td><td>Limbhet</td><td>Pond Desilting</td><td>6,03,10,800</td></tr>
<tr><td>6</td><td>Fulvadi</td><td>Pond Desilting</td><td>3,43,96,000</td></tr>
<tr><td colspan="3">Total Water Conservation in Cr Ltr</td><td>23,17,71,300</td></tr>
</table></td></tr>
</table>

<table>
<tr><td>2</td><td>Provision of Ambient Air Monitoring Facility (01 No.) in GIDC Jhagadia</td><td>Complied
We have procured an online ambient air quality monitoring system supplied by M/s. NEVCO. The analyzers are meeting CPCB RTDMS guidelines and handed over to M/s. Jhagadia Industrial association.
The location for installation of system was finalized by M/s. Jhagadia Industrial association in consultation with GPCB & CPCB. Now the system is commissioned and JIA has mapped this system with CPCB RTDMS portal. Details is attached as Annexure-21.</td></tr>
<tr><td>3</td><td>Reclamation and Construction of wall around the ponds, plantation around the ponds, cleaning of the ponds at Kharachi, Sardarpura, Talodra, Vakhatpura villages</td><td>Complied.
Last half-yearly detail (April’25 to Sept’25) is as mentioned below:
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<tr><th>Sr. No.</th><th>Village</th><th>Activity</th><th>Water Conservation (Cr. Ltr)</th></tr>
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<tr><td colspan="3">Total Water Conservation in Cr Ltr</td><td>23,17,71,300</td></tr>
</table></td></tr>
<tr><td>4</td><td>Providing waste management facility along with sound garbage management in Fulwadi, Kapalsadi, Talodara villages</td><td>Complied.
Rapid need assessment study completed by various expert agencies in surrounding villages.
Based on feasibility and government authorities’ recommendations, initiated Solid Waste Management activities at Jhagadia. The State-of-Art “Zero Waste - Zero Cost” model, is the first of its kind in Gujarat.

Fulwadi, Kapalsadi and Talodara villages will be linked with Sanitation Park post authority’s consent.
 
</td></tr>
<tr><td>5</td><td>Rain water harvesting system (Recharge Structures) at Dadhal, Kapalsadi, Limet villages.</td><td>Complied.
A baseline study has been conducted by BISLD and as per findings; execution plan has been prepared in consultation with Village Panchayats and community.</td></tr>
</table>

Last half-yearly detail (April'25 to Sept'25) is as mentioned below:

Sr. No.	Village	Activity	Water Conservation (Cr. Ltr)
1	Sanjali	Pond Desilting	2,81,27,640
2	Vadhvana	Pond Desilting	2,80,38,200
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6	Fulvadi	Pond Desilting	3,43,96,000
Total Water Conservation in Cr Ltr			**23,17,71,300**

Rain water harvesting pond work

Harvested rain water

6	Provide new structures for sanitation & toilets at Kharachi, Bhilwada, Navagam Kararwel, Untia villages	Complied. Already constructed more than 450 toilets in surrounding villages. 
B	Soil & Water Conservation:	
1.	Land gradation work for preparing the irrigation plot for uniform distribution of irrigation water on the field and ensuring the optimal slope for water movement across a field resulting in water and energy saving through efficient irrigation at Gumanpura & Motipura villages	Complied. As per the findings of a baseline study conducted by BISLD, we have installed 5 drip irrigation systems at Untia village. This covers 5 Acre of agriculture land. Moreover, We helped community to install solar lift irrigation system as a part of energy efficient irrigation at Limet to be operated by farmers' Water User Group. This covers a group of 10 farmers and about 20 Acre agriculture land.
2	Farm bunding and farm pond at Limet, Nikoli, Randeri villages	Complied. For all the water and soil related work a baseline study has been completed by BISLD and as per findings plan has been prepared and in management's approval. Structures and interventions have been identified and action will start post approval. We will update the progress in next report. Further, we have constructed a farm pond at Boridra village and additionally 62 Nos. of MFOs (masonry field outlet) at Limet, Untia, Boridra and Kharchi villages in last FY. Total water conservation capacity increased is: **1,77,69,189** Ltr.
C	**Green Belt Plantation & Maintenance:**	
1	Tree Plantation & Green belt development (10 to 15 Acre land will be taken on rent from nearby village	Complied. ***2022-23*** Planted 10,000 saplings in the Notified area within GIDC using dense tree plantation method

	Gram Panchayat for plantation) at Fulwadi, Selod, Talodara, Dadheda, Kapalsadi, villages etc.	***2023-24*** Planted 12,000 saplings in the Notified area within GIDC using dense tree plantation method. Also planted 25,000 mangroves in the Jambusar block ***2024-25*** Planted 1,000 saplings in the Notified area within GIDC using dense tree plantation method. ***2025-26:*** Gap filling of plantation activity done 2800 nos. within GIDC premises during April'25 to Sept'25.     Also planted 4,10,000 mangroves in the Jambusar block  

		
D	**Education & Skill development - Environment**	
1	Skill Development — Imparting Training / Contribution @ ITI (Govt. Undertaking — Director General of Training) Towards Training of ETP, STP Operators, Boiler Operator / Attendant, Fitters, Welders, AOCP etc. at Fulwadi, Selod, Talodara, Dadheda, Kapalsadi villages etc.	Complied Support to Vivekanand Gramin Takniki Kendra for skill training • Donation of equipment to start DCS Plant Operator Course at VGTK in 2023-24. • Extending financial support to a batch of 15 deserving students for education fees, lodging and boarding every year. • Total 45 students had completed this course and received sustainable employment. 15 students are studying this.   
E	**Health and Hygiene:**	
1	Provision of Ambulance van with medical equipments and awareness programs on prevailing diseases at Navagam Mota, Selod, Dadhal, Sardarpura, Vakhatpura, Fulwadi villages.	Complied. • Dedicated and well equipped Ambulance Van with dedicated team comprising MBBS doctor, paramedical staff and a social worker has been started from Feb. ’23 covering 122 villages of entire Jhagadia Taluka.

		• The van takes care of pregnant and lactating mothers as well as new born children for overall health improvement aiming to promoting institutional deliveries and ensuring near zero infant and maternal mortality. 
33	The unit shall implement the project of HCI Synthesis furnace for purification of spent HCI (as per technology supplied by Graphite India Ltd. as per commitments to SEAC. The status and progress of this activity shall be reflected in the compliance of EC conditions.	Complied. New furnace has been provided as per Graphite India Ltd meeting this requirement. Details attached as ***Annexure-22***.
34	The unit shall continue efforts in R & D activities (excluding CER activities) in partnership with reputed research institutes like National Chemical Laboratory, Pune for Research in future & Development activities to identify a viable product with HCI or for suggestions for HCI purification and reuse in future, as commit4ed to SEAC. The status and progress of this activities shall be reflected in the compliance of EC conditions	Complied. We had contacted & followed up with national Chemical Laboratory. However, the response was delayed. Hence, we have signed agreement with CSIR-CSMCRI for R&D study for spent HCL acid purification for reuse on dated 26.09.2023. Copy of final report is attached as **Annexure-23.**
35	The unit shall continue initiating & developing proposal with Alkali Manufactures Association of India (AMAI) to study and derive a common formula process for the purpose of purifying spent HCI. (Excluding CER activities as per commitments to SEAC The status and progress of this activity shall be reflected in the compliance of EC conditions.	Complied. As suggested by the SEIAA, we have initiated discussion with Alkali Manufacturer's Association of India to study and derive a common formula / process for the purpose of purifying spent HCL during last AMAI meeting and their response is awaited. Copy is attached as ***Annexure-24***
36	All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared by M/s. Kadam Environmental Consultants and submitted by the project proponent and commitments made during presentation before SEAC and proposed in the EIA report shall be strictly adhered to in letter and Spirit.	Complied. All the recommendations and mitigation measures as per recommendation are complied with. A copy of report is attached as ***Annexure-25.***

<table>
<tr><td></td><td colspan="2">B. GENERAL CONDITIONS:
B.1 CONSTRUCTION PHASE</td></tr>
<tr><td>37</td><td>Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.</td><td>Complied. Construction phase is over</td></tr>
<tr><td>38</td><td>Project proponent shall ensure that surrounding environment shall not be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for controlling fugitive emission.</td><td>Complied. Construction phase is over
Water is sprinkled to suppress airborne dust.
All roads and working areas are either of RCC or asphalt covered.</td></tr>
<tr><td>39</td><td>All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the construction phase.</td><td>Complied during construction phase.</td></tr>
<tr><td>40</td><td>First Aid Box shall be made readily available in adequate quantity at all the times.</td><td>Complied
First Aid box details: First aid boxes are kept in strategic locations in existing plant and same shall be continued for proposed expansion.

Sample photograph of First aid box in one of the locations (PMCC) is as under:-
 

The OHC staff of the Unit is inspecting the contents of the First Aid box on monthly basis. The records of the same are available with OHC.
Antidote details:
The List of Chemicals used and their corresponding antidotes with sufficient quantities are being maintained by OHC.

<table>
<tr><th>Sr. No</th><th>Chemical</th><th>Antidote / Symptomatic Treatment</th></tr>
<tr><td>1</td><td>Caustic soda</td><td>No antidote, symptomatic treatment</td></tr>
<tr><td>2</td><td>Chlorine</td><td>No antidote, Symptomatic treatment</td></tr>
</table>
</td></tr>
</table>

3	Hydrochloric acid	No antidote, symptomatic treatment
4	Sulphuric acid	No antidote, symptomatic treatment
5	Sodium hypochlorite	No antidote, Symptomatic treatment
6	Epichlorohydrin	No antidote, symptomatic treatment
7	Hydrogen Peroxide	No antidote, symptomatic treatment
8	Purified Glycerin	No antidote, symptomatic treatment

Sr. No	Injectable Antidote	Antidote For
1	Inj Atropin Sulphet	Vaso vagal attack
2	Inj – A.S.V.	Snake Venom
3	Inj Avil	Anti-histaminic/ Anti allergic
4	Inj- Tetanus Toxide	Tetanus
5	Inj Phenergan	Sedative, Anti emetic
6	Inj Deriphyllin	Broncho dilator
7	Inj Avil	Anti histaminic/ Anti allergic
8	Inj Dexona	Anti inflamatory/ Anti allergic
9	Charcol Powder	Over Uses of Drugs

41	The project proponent shall strictly comply with the Building and other Construction Workers (Regulation of Employment & Conditions of Service) Act 1996 and Gujarat rules made there under and their subsequent amendments Local bye-laws of concern authority shall be complied in letter and spirit.	Complied during construction phase.
42	Ambient noise levels shall conform to residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.	Complied. Sample copy of third party monitoring is attached as ***Annexure-26.***
43	Use of Diesel Generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the EPA Rules for air and noise emission standards.	Complied during construction phase.
44	Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.	Complied during construction phase.

45	All topsoil excavated during construction activity shall be used in horticultural / landscape development within the project site	Complied during construction phase
46	Excavated earth to be generated during the construction phase shall be utilized within the premises to the maximum extent possible and balance quantity of excavated earth shall be disposed off with the approval of the competent authority after taking the necessary precautions for general safety and health aspects Disposal of the excavated earth during construction phase shall not create adverse effect on neighboring communities	Complied during construction phase as required.
47	Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, Concrete [RMC] and lead free paints in the project.	Complied. We have utilized eco-friendly materials- fly ash bricks for building construction during project activity.
48	Fly ash shall be used in construction wherever applicable as per provisions of Fly Ash Notification under the E.P. Act 1986 and its subsequent amendments from time to time	Complied. We have utilized eco-friendly materials- fly ash bricks for building construction during project activity.
49	Wind — breaker of appropriate height i.e. 1/3rd of the building height and maximum up to 10 meters shall be provided. Individual building within the project site shall also be provided with barricades	Complied during construction phase
50	"No uncovered vehicles carrying construction material and waste shall be permitted "	Complied during construction phase
51	"No loose soil or sand or construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emissions shall be ensured.'	Complied during construction phase
52	Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads).	Complied. RCC roads are constructed within the site.
53	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	Complied during construction phase.
54	Dust mitigation measure shall be displayed prominently at the construction site for easy public viewing.	Complied during construction phase.
55	Grinding and cutting of building materials in open area shall be prohibited.	Complied. No grinding and cutting in open area was carried out in construction phase.

56	Construction material and waste should be stored only within earmarked area and road side storage of construction material and waste shall be prohibited	Complied during construction phase.
57	Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures be notified at the site. (If applicable)	Complied during construction phase.
	B.2 Operation Phase **B.2 .1 Water**	
58	The water meter shall be installed and records of daily and monthly water consumption shall be maintained.	Complied. We have installed the water meters at all strategic locations to record the consumption.  **Water meter for raw water consumption**
59	All efforts shall be made to optimize water consumption by exploring Best Available Technology (BAT) The unit shall continuously strive to reduce, recycle and reuse the treated effluent.	Complied. We have implemented the best available technology our caustic soda plant as well as ECH & H2O2 plant. In addition to that we have formed internal CFT to conduct detailed water audit on monthly basis to identify the area of opportunities for water conservation and its implementation. The major initiatives were • Permeate from RO plant in CPP recycled back to cooling tower make up • Sewage is treated separately in STP and treated water is being reused for green belt development and dust suppression. Photos of green belt is attached as ***Annexure-16.*** • DM water back wash streams containing of acidity and alkalinity are reused in the caustic process operations. • Boiler convection water treatment changed with AVT treatment resulted in saving in boiler blow down. • Use of washed salt is ensured to reduce generation of brine sludge and less consumption of chemicals. Collecting and recycling all our steam condensate and recycling it for reuse.

	B.2.2 AIR:	
60	In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that there 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.	Not Applicable, as we don't have spray drier in our operation.
61	Acoustic enclosure shall be provided to the DG sets (If applicable) to mitigate the noise pollution and shall conform to the EPA Rules for air and noise emission standards.	Complied. Existing DG set is having acoustic enclosure. No additional DG set is installed.
62	Stack/Vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission / process gas emission.	Complied. We have provided the APCMs with stacks of adequate height in all process and flue gas stacks and their performance is being monitored and shared to CPCB /GPCB on real time basis. 
63	Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/ MoEF&CC. At no time, emission level should go beyond the stipulated standards.	Complied as explained above
64	All the reactors / vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	Complied. Our processes are closed cycle and the tanks/enclosures are covered/ sealed to reduce the potential fugitive emission.

B.2.3 HAZARDOUS /SOLID WASTE		
65	The company shall strictly comply with the rules and regulations with regards to handling and disposal of Hazardous waste in accordalime the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016, as may be amended from time to time. Authorization of the GPCB shall be obtained for collection / treatment / storage / disposal of hazardous wastes.	Compiled We are complying with the rules and regulation of HWM Rules 2016 and maintaining Form -3 and submitting form-4 and manifest system as per the requirements on regular basis.
66	Hazardous wastes shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.	Complied, We have taken necessary permissions for all such wastes and ensuring its disposal as per the requirements of the Rule.  Hazardous waste storage facility
67	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable)	Complied. We already have necessary permissions from BEIL Infrastructure Limited , Safe Enviro Private Limited (SEPL) & Hindustan Enviro Life Protection Services Ltd. (HEPL) TSDF, copy of membership attached as **Annexure 19.**
68	Trucks/Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.	Complied. We are ensuring that all vehicles used transportation of hazardous waste are in accordance with applicable rules.
69	The design of the Trucks/tankers shall be such that there is no spillage during transportation	Complied. We are ensuring the same as per requirement
70	All possible efforts shall be made for Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF	Noted. Fly ash is completely reused in cement, RMC and brick manufacturing etc. While we are exploring the possibilities of co-processing of hazardous wastes.
71	Management of fly ash (If any) shall be as per the Fly ash Notification 2009 & its amendment time to time and it shall be ensured that there is 100% utilization of fly ash to be generated from the unit	Complied, Last report for the period April-24 to March-25 was submitted annual return of fly ash, vide our letter no. SAC-SHE-E-FL-26/JUNE'25/01 dated 30.06.2025.
	B.2.4 SAFETY	

72	The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963.	Complied. We have obtained necessary approvals from DISH, to install and operate the facilities in the plant. The authorities have approved the proposed drawings and issued License to operate the plant. Factory license no. 24315 issued by DISH authority is valid up to 31.12.2026. all conditions as per requirement are complied with.
73	The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules (MSIHC) 1989, as amended time to time and the Public Liability Insurance Act for handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning of the project Requisite On-site and Off-site Disaster Management Plans have to be prepared and implemented	Complied. We are complying with the provisions made in MSIHC Rules 1989. We have got the PLI policy for handling and transportation of Hazardous goods. Necessary approvals from Chief controller of explosive and concerned government authorities as per details included in the sr. no. 8 (A). We have submitted on-site emergency plan to concern government authority. Copy of PLI policy 2025-26 attached as **Annexure 27.**
74	Main entry and exit shall be separate and clearly marked in the facility.	Complied. We have separate entry and exist at our site.
75	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/ emergency vehicle around the premises.	Complied. We have earmarked margin area all around our plant for emergency services.
76	Storage of flammable chemicals shall be sufficiently away from the production area.	Complied. In our existing facility, Hydrogen storages (banks and holder) & Solvent and Glycerin storage facility are kept separate from production area with all necessary statutory precautions and it will be maintained.
77	Sufficient number of fire extinguishers shall be provided near the plant and storage area.	Complied. Sufficient nos. of Fire Extinguisher i.e Mechanical foam type, Dry Chemical powder type, Carbon dioxide type are provided at strategic locations in the plant. This is as per the suggestions made by experts in Fire Risk Assessment. Fire & safety dept. periodically check and maintains the records. 

78	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals.	Complied. We have well-defined, active and passive control to mitigate any risk of handling and storage of hazardous chemicals. Necessary engineering control, Relief systems, Early detection through strategically located sensors, 24 x 7 dedicated emergency handling crew, emergency responders, water sprinkler and curtain system, fire hydrant network, emergency preparedness plan and PPE's management are the part of safety management system.
79	All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permissions in this regard shall be obtained before commencing the expansion activities.	Complied. We have obtained necessary approvals from concern authority to operate the facilities in the plant. We have provided separate storage area along with dyke walls for raw material as per their compatibility. 
80	The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report	Complied. We are being comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report Copy of the Risk assessment report with their compliance status is attached as **Annexure-25.**
81	Only flame proof electrical fittings shall be provided in the plant premises	Complied as per condition S.N#8(i) of SEIAA/GUJ/EC/5(f)/1597/2022 dated 31st May-2022
82	Storage of hazardous chemicals shall be minimized and it shall be in multiple small capacity tanks / containers instead of one single large capacity tank / containers.	Complied. We are having multiple storage of chemicals with dyke facility. Adequate dyke wall (of Height: 1.3 meter) have been provided around the Hydrochloric acid tanks. Refer photographs below: 

		
83	All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals.	Complied. Bond /dyke walls have been provided for all the storage tanks of Caustic, HCl, H2SO4, Hypo and it is being maintained 
84	Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.	Complied as explained above.
85	Tie up shall be done with nearby health care unit / doctor for seeking immediate medical attention in the case of emergency.	Complied. We maintains an Occupational Health Centre within the complex round the clock base for immediate first aid. The OHC is manned by 02 nos of regular qualified doctors and 5 nos of qualified paramedic staff. List of nearby health care unit is attached as ***Annexure-28.*** Besides that unit has tied up with the nearest health care units at Bharuch, Ankleshwar, Jhagadia and Vadodara for immediate medical support.
86	Personal Protective Equipment's (PPEs) shall be provided to workers and its usage shall be ensured and supervised.	Complied. All necessary PPEs have been provided to workers and they are continuously encouraged for their use. PPE boxes are kept in different sections of the existing plant with all necessary PPEs and will provide the same in our upcoming plant as well

		
87	First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	Complied as per condition S.N#40 of SEIAA/GUJ/EC/5(f)/1597/2022 dated 31st May-2022
88	Training shall be imparted to all the workers on safety and health aspects of chemicals handling.	Complied. We are providing trainings on chemical handling. Copies of the training attendance sheet and medical checkup record are attached as **Annexures-29 & 30** respectively**.** for your reference We are conducting certified chemical handling safety training by DISH approved faculty on regular basis, sample certificate are attached as **annexure 29.**
89	Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre-employment and periodical medical examination for all the workers shall be undertaken as per the Factories Act & Rules.	Complied. We conduct pre-employment medical checkup and six monthly medical checkup of our employees. Form no-32 is being maintained by DCM-SAC as a record of Occupational health surveillance of all employees (including workers). Sample copy of the record is attached as ***Annexure-05.*** Pre- employment medical checkup is conducted for all the employees (including workers) and six monthly medical checkup is also being done. Records of the above are being maintained with OHC. Sample copy of the record is attached as ***Annexure-29*****.**
90	Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.	Complied. We are a Responsible Care logo certified Unit and have engaged an expert agency for monitoring the same and ensure their compliance. Copy of RC certificate is attached as ***Annexure-20.*** Regular trainings are being imparted to the drivers of the hazardous chemical transporting vehicles. Records of such training are well maintained. TREM card and

		MSDS are provided with each vehicle transporting the hazardous chemicals. We are also taking care to verify valid registration, Driving License, PUC, First aid, safety equipment's, TREM card, Spark arrestor & vehicle condition also as required under "The Central Motor Vehicle Act 2019"
91	The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report.	Complied. We are ensured to implement all preventive and mitigation measures suggested in the Risk Assessment report. Details are attached as ***Annexure-25.***
92	Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.	Complied. We have completed the process for obtained necessary approvals from authorities as required. PESO license copy is attached as ***Annexure-04***
	B.2 .5 Noise	
93	The overall noise level in and around the plant area 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.	Complied. We have provided acoustic enclosures in turbines and monitor the work place noise on regular basis. Silencers have been provided at the steam exit points as per the requirements. Acoustic enclosures are provided as required. Silencers are provided to high pressure steam vents (as per photograph below) to control noise.
	B.2 .6 Cleaner Production and Waste Minimization	
94	The unit shall undertake the Cleaner Production Assessment study through a reputed institute /	Complied. Cleaner Production Team is established at our site. As per their recommendations, we have

	organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to the GPCB.	adopted membrane technology process for caustic production & Fluidized Bed combustion in boiler, using hydrogen for caustic concentration purpose, which are cleaner production method available as on date
95	**The company shall undertake various waste minimization measures such as -**	
a	Metering and control of quantities of active ingredients to minimize waste.	Complied. Metering of quantities of each ingredient is being done and optimized to reduce waste Hydrogen is reused in making HCl, and as fuel substitute. Chlorine is reused for making Sodium Hypochlorite.
b	Reuse of by-products from the process as raw materials or as raw materials substitutes.	Complied. We are using SRS technology to reduce the chemicals consumption. Also Anhydrous Sodium Sulphate (AnSS) is providing an additional opportunity of resource conservation.
c	Use of automated and close filling to minimize spillages.	Complied. Caustic lye & chlorine tonners are filled with automatic filling with cut-off adjustment and overfilling alarm
d	Use of close feed system into batch reactors.	Not Applicable. Ours is a continuous plant.
e	Venting equipment through vapor recovery system.	Complied. Solvent recovery system for H2O2 plant is installed before its venting as explained above.
f	Use of high pressure hoses for cleaning to reduce wastewater generation.	Complied. high pressure hoses is used for cleaning of chillers tube, heat exchanges, condenser etc.
g	Recycling of washes to subsequent batches.	Not Applicable. Ours is a continuous plant.
h	Recycling of steam condensate.	Complied. System for collecting and recycling of steam condensates is in place.
i	Sweeping / mopping of floor instead of floor washing to avoid effluent generation.	Complied. Cleaning is done with high pressure hoses only.
j	Regular preventive maintenance for avoiding leakage, spillage etc.	Complied. Preventive maintenance schedule is in place and being followed as required.
	B.2 .7 Green Belt and Other Plantation	
96	The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on road sides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC / GPCB and	Complied. We have a well-developed green belt at our site and are continuously working for further enhancing the same. We have developed greenbelt in GIDC area, road sides and in Bharuch. We are further exploring empty GIDC land for plantation. Photos of green belt is

	submit an action plan of plantation for next three years to the GPCB.	attached as ***Annexure-16***. A reference photograph of the same is shown below:      Also initiated for Mangrove plantations in Jambusar block of Bharuch and Khambhat block of Anand.  

		
97	Drips irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.	Complied We have installed low volume sprinkler system in the premises for watering purpose.
	B.3 Other Conditions	
98	The projects covered under category 5(f) shall undergo the safety and environment audit regularly as per the standards laid down by the GPCB and CPCB.	Complied. Required external safety & environmental audits is in placed on regular basis.
99	PP shall carry out the safety audit and Risk Assessment Report as per the prevailing guidelines of safety.	Complied as explained above.
100	Management of Fly Ash shall be as per the Fly Ash Notification 2009 & its amendment from time to time and it shall be ensured that there is 100 % utilization of fly ash to be generated from the unit.	Complied as per condition S.N#71 of SEIAA/GUJ/EC/5(f)/1597/2022 dated 31st May-2022
101	EMP should invariably include provisions for environmental Monitoring and measures for noise pollution control measures.	Complied. Environmental monitoring is conducted as required and reports are submitted to GPCB on regular basis.
102	Wherever waste water or chemical water to be collected by tankers and transported to CETP etc. any diversion and disposal in open drainage (nallah) etc. causing human and environmental damage or loss will make it liable for action under the law.	Noted. No such issue observed in reporting period.
103	All transport movement by tankers etc has to be done with maintenance of gate pass and logbook it should be verified by inspecting authorities.	Complied. We have provided dedicated 3 nos. of material gate for tanker movement through gate pass and logbook system. Additional 2 gates are being provided for material movement.
104	Non-hazardous waste data shall be informed to GPCB time to time so as to make an assessment and tie-up with industry for generating sustainable power from the waste.	Complied. We are submitting the waste data to GPCB on monthly and yearly basis as a part of compliance.
105	All chemical, pharma industry etc. should ensure predictive and preventive maintenance of factory /	Complied. We are following the preventive checks and maintenance on regular basis to avoid fire and safety hazards.

<table>
<tr><td></td><td>boiler and reactive as to avoid incident of fire and safety hazards.</td><td></td></tr>
<tr><td>106</td><td>EMP should include STP and detail cost including maintenance, transportation of waste water to CETP / CMEE etc as well as transportation cost or transit cost.</td><td>Complied. We have already consider the same in our annual budget.</td></tr>
<tr><td>107</td><td>In LDAR preventive and predictive maintenance plan.</td><td>Complied. Leak Detection and Repair program is in place and Chlorine sensors and Hydrogen sensors are planned for installation with necessary indication in DCS. We have 83 Chlorine sensors, 5 nos. of HCL gas detectors and 54 Hydrogen sensors with their indication in DCS have been provided for the purpose in existing & new plants.
Sample calibration report of sensors is attached as Annexure-09.</td></tr>
<tr><td>108</td><td>In LDAR leakage component, source of equipment leak, detention method should be given in table form.</td><td>Complied.
<table>
<tr><th>S. N</th><th>Source</th><th>Method</th></tr>
<tr><td>1</td><td>Chlorine</td><td>Chlorine sensors at strategic location</td></tr>
<tr><td>2</td><td>Hydrogen</td><td>Hydrogen sensors at strategic location</td></tr>
</table></td></tr>
<tr><td>109</td><td>In storage component should be shown separately in terms whether inflammable, toxic, corrosive, reactive etc.</td><td>Point noted and being complied with.</td></tr>
<tr><td>110</td><td>In case of Fly Ash generation its management and disposal should be as per Government of India Notification and 100 % utilization should be ensured.</td><td>Complied.
We are ensuring to follow the prescribed standards and guidelines for 100 % fly ash utilization in our upcoming plants also.</td></tr>
<tr><td>111</td><td>Project proponent shall install all environment management systems as per the CPCB/GPCB directives regarding the effluent discharge and air emission in working condition.</td><td>Complied. We have provided all required Environmental management systems (APCMs in process & flue gas stacks, ETP, RO, STP, Incinerator for ECH plant etc.) as per requirement. ETP photos are attached as Annexure-11 & STP detail is attached as Annexure-13</td></tr>
<tr><td>112</td><td>Project proponent shall display the copy of Environment Clearance at the site prominently.</td><td>Noted. We are uploading the compliance report of Environment Clearance on website on regular basis. Link is: https://www.dcmshriram.com/our-businesses/chlor-vinyl-business</td></tr>
<tr><td>113</td><td>Project proponent shall prepare and follow regular and preventive maintenance plan. The copy of same shall be submitted to SEIAA.</td><td>Complied. We have implemented the preventive maintenance plan and following it on regular basis as per requirement.</td></tr>
</table>

114	Project Proponent will have to display the safety procedure in working area.	Complied. We have displayed the safety procedures, Do & Don't for safety and relevant safety signages board at our working area.  
115	The project proponent shall obtain all required permissions for safety, health and fire from competent authorities like PESO/Fire Authority etc. and intimate SEIAA.	Complied, We have obtained all required permission for safety, health & fire from concern authorities.
116	Project Proponent will intimate SEIAA/SEAC/GPCB after obtaining the membership of common facilities like CETP / TSDF / CHWIF / CMEE / Common Spray Dryer as the case may be.	Complied, We membership from BEIL Infrastructure Limited , Safe Enviro Private Limited (SEPL) & Hindustan Enviro Life Protection Services Ltd. (HEPL) for TSDF. Copy of membership attached as ***Annexure-19***
117	Extra care will be taken by PP to avoid any accidental blast in boiler, reactor or any machinery in the plant.	Noted. Care has been taken as required.
118	Environment monitoring, training and disaster management plan should be undertaken and complied at regular interval.	Complied and as explained earlier
119	Integrated Regional Office of MoEF&CC, Gandhinagar and GPCB will monitor all environment, safety & health norms as per the prevailing rules.	Noted.

120	The PP has to maintain the log sheets / registers / manifest / gate pass for discharge through tankers and SCADA system for pipeline discharge for the waste water generation and its disposal data and submit to the GPCB every quarter. GPCB shall verify the same on regular basis and inform SEIAA and take legal action in the cases of non-compliance.	Complied. We are maintaining the all relevant log sheets, manifest, GPS tacking system and gate pass system for waste disposal. Also we have provided online continuous monitoring system for pipeline discharge for the waste water generation which is connected with DCS. We are submitting the details to GPCB on regular basis.
121	Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC vide no. F. No. 22-34/2018-IA.III dated 09/08/2018 for Pharmaceutical and Chemical industries mentioned at (Sr. no. XX).	Complied The Office memorandum (OM) is regarding general condition as per EC, We are complying the requirements as follows: 1. Statutory Compliance: • We are complying with all the applicable statutory requirements and have received all the applicable permissions for our site. 2. Air Quality monitoring & Preservation: • We have installed online CEMS (connected to CPCB / GPCB servers) in all our process stacks and flue gas stacks to monitor the stack emissions. Preventive maintenance and regular calibration is ensured. • We are monitoring fugitive emissions through recognized labs every month • Regular ambient air quality monitoring facility has been established at site as per the requirements and monitoring is being done for applicable parameters. Sample reports are attached as ***Annexure-02*** • We used coal having low sulfur content and emission from boiler furnace is de-suphurized with limestone. Also the emission sources are connected to stacks having adequate height as per CPCB guidelines. • We have covered storage yards for chemicals and coal. • We are complying with the national ambient air quality emission standards. • Our emergency DG sets are equipped with adequate stack height and the emissions are conforming to the applicable standards. 3. Water Quality Monitoring & Preservation • We have installed online CEMS (connected to CPCB / GPCB servers) in our ETP discharge. • All our effluent discharge parameters are conforming to the standards prescribed by

		GPCB, effluent monitoring sample report attached as ***Annexure-14*** • Total fresh water requirement is always within the consented quantity and have not exceeded. • We have separate process and storm water drains in our premises and process effluent are not allowed to mix with storm water. • We have implemented rainwater harvesting system in our unit and use the harvested rain water for green belt irrigation. Photos of green belt is attached as ***Annexure-16***. • We have taken initiative of site-level cross-functional team (CFT) named "FRIENDS OF WATER" to drive water conservation initiatives through out the year. • We have invited GPCB officers and they observed our several good initiatives such as internal team conducting monthly water audits and site surveys and working on improvement opportunities. • As a result of these focused efforts, we have represented achievement of significant water conservation of 25% of total consumption in FY24-25, which is around 11 Lacs KL. • GPCB RO officer was invited on the occasion of World Water Day 2025 where our senior management has made presentation on the various initiatives and awarded the team members who contributed in marking a commendable step toward sustainable water management. 

4. Noise Monitoring & Prevention:

- Acoustic enclosure has been provided for emergency DG sets.
- We have provided acoustic hoods; silencer and enclosure etc to ensure to comply with the noise standards and overall noise level in and around the plant area are always within the standards.
- Ambient noise levels are as per EPA Rules 1986, results are within range as prescribed.

5. Energy Conservation Measures

- **RE Power Utilization:** Successful sourcing of 50.46 MW of renewable power through this network is already started, creating huge potential of GHG emission reduction.
- Energy Audit was conducted in two Phases-14 to 20th June and 9 to 16 Aug'23 by CII to explore Energy Saving opportunities. Various points has been implemented as per recommendation.
- We have changed our lighting fixture to LED resulting in saving of 2.07 KWH per day.
- We have received recently Golder Bird GOLD award and Green maple award for Energy Conservation (platinum)
- This unit has engaged into long term sourcing of renewable energy (RE) power utilization upto 50.46 MW through DGVCL electrical power supply system. RO office is also guiding the management of this unit from time to time.

		• This ReNew power is generated by wind and solar sourcing and the unit is monitoring this consumption through DGVGL bills. • This unit has already consumed 8,78,54,125 KWH of electricity in FY25-26 (upto SEPT'25). This strategic shift toward cleaner energy sources has resulted in a marked reduction in overall environmental foot print.  • We have implemented Energy Management system (ISO 50001:2018) • After completing the external audit, we have obtained EnMS certificate dated 01.11.2024 valid upto 01.11.2027

Alcumus ISOQAR

Certificate of Registration

This is to certify that the Management System of:

DCM Shriram Limited (Unit: Shriram Alkali & Chemicals)

749, GIDC Industrial Estate, Jhagadia, District Bharuch - 393 110, Gujarat, India

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 50001:2018 Energy Management

Certificate Number: 9182-EnMS-001
Initial Registration Date: 1 November 2024
Expiry Date: 1 November 2027

0026

Scope of Registration:

The continual improvement of energy performance, including energy efficiency, energy use and consumption relevant to the manufacture and supply of Caustic Soda (Lye & Flakes), Hydrochloric Acid, Chlorine (including Chlorine Cylinder Testing), Hydrogen, Sodium Hypochlorite & Anhydrous Aluminium Chloride and steam supply.

Signed:
Alyn Franklin, Chief Executive Officer
(on behalf of Alcumus ISOQAR)

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR.

Alcumus ISOQAR Limited, Alcumus Certification, Cobra Court, 1 Blackmore Road, Stretford, Manchester M32 0QY.
T: 0161 865 3699 F: 0161 865 3685 E: isoqarenquiries@alcumusgroup.com W: www.alcumusgroup.com/isoqar
This certificate is the property of Alcumus ISOQAR and must be returned on request.

- We have obtained ISCC Plus certificate for their products. This certificate is valid from 03.10.2025 to 02.10.2026.

Alcumus ISOQAR

ISCC CERTIFIED PLUS

ISCC PLUS Certificate

Certificate Number: ISCC-PLUS-Cert-GB206-20259003

Alcumus ISOQAR Ltd
Cobra Court, Blackmore Road 1, M32 0QY, Stretford, Manchester, United Kingdom
certifies that
DCM SHRIRAM LIMITED (UNIT: SHRIRAM ALKALI AND CHEMICALS)
Plot no 749, GIDC Industrial Estate, Jhagadia - 393110, Dist.: Bharuch, Gujarat, India

complies with the requirements of the certification system
ISCC PLUS
(International Sustainability and Carbon Certification)

Place of the audit
(if different from the legal address of the system user as stated above; only applicable for traders and traders with storage):
N.A.

This certificate is valid from 03.10.2025 to 02.10.2026.

The site of the system user is certified as:
Specialty chemical plant

The scope of the certificate includes the following chain of custody options:
(not applicable for paper traders)
Mass Balance

Stretford, Manchester,
27.09.2025

Place and date of issue

Stamp, Signature of issuing party

The issuing Certification Body is responsible for the accuracy of this document.
Version / Date: 1 / 27.09.2025

6. Waste Management

- Hazardous chemicals are stored in tank farms and flame arrestors are provided on the tank farm.
- We are sending our process inorganic waste (Brine sludge-Non hazardous) to TSDF.

		• We are undertaking waste minimization by metering and control of quantities in all our processes, • We have taken up implementation of project for product recovery from our waste sodium rich stream from SRS to recover ANSS. • We have achieved 100% utilisation of ash generated from our captive powerplant • We are providing 100% dilute sulphuric acid, haz waste through rule-9 approved authorised end-users for usage as raw material as a part of circular economy. • We have also obtained the guidance from Regional Office for exploring the utilization of solid waste- brine sludge. Now, we are planning to take the trial for brick manufacturing authorized end user. • We have also requested with technical details to establish the usage of glycerin pitches for recovery of green energy in form of bio-gas through anaerobic digestion process unit in Bharuch. 7. Green Belt • We have a well developed green belt all around our plant area and outside. Photos of green belt is attached as ***Annexure-16***. 8. Safety, Public Hearing and Human Health Issues • We have a well defined emergency preparedness plan bases on the inputs from HIRA and quantitative risk assessment and same has been implemented at our site. • Unit has well laid fire hydrant network in the premises with sufficient nos. of Fire Extinguishers at strategic locations to mitigate the fire risks. • PPE's are provided to all employees and regular training for use of PPE's is provided to all employees. • Regular training is imparted to all employees on safety and health aspects of chemical handling. Pre- employment medical checkup is conducted for all the employees (including workers) and six monthly medical checkup is also being done. Records of the above are being maintained with OHC. • Form no-32 is being maintained by Unit as a record of Occupational health surveillance of

		all employees (including workers). Sample copy of the record is attached as ***Annexure-05*** • We have adequate parking space for vehicles of raw materials and finished goods additionally GIDC parking space is available for vehicles during night time. Also working on improving Turn Around Time (TAT) to minimize waiting of vehicles. • Well designed Fire hydrant system with stand-by pump facility and reservoir. • Two fire tenders with well-trained firefighting staff to control fire. One was recently introduced.  • We have also installed different types of fire extinguishers at strategic locations as per standards. The same will be continued in the upcoming new plant. • Fire hydrant system is expanded to fulfil the additional safety requirement of expanded capacity for caustic soda plant as well as hydrogen peroxide and epichlorohydrin plant. 9. Corporate Environment Responsibility. • Our unit has an EHS policy duly signed by our Occupier, which is followed. • We are in compliance with the applicable provisions of CREP guidelines for Chlor-alkali plants and thermal power plants, The chlor-alkali process used in the plant is a Membrane cell based process. Hence, as applicable, in the guideline, the unit has adopted the pollution and safety aspects for Cl2 handling to prevent any accident / release of Cl2. • The fly ash generated in the Captive Power plant is completely reused for Fly ash brick, cement manufacturing and RMC as per Fly ash notification.

		• Our unit is recertified for Responsible Care Logo with validity of Dec 2025. Copy of certificate is attached as ***Annexure-20.*** • Environment cell developed for environmental monitoring of various parameters as required. • The year wise environmental expenses are in line with the funds earmarked for environment protection measures. The Funds for environmental expenses are not diverted for any other purpose. • We are conducting 3rd party environment audit through an external agency appointed by GPCB on yearly basis. • We are publishing sustainability report as per GRI guideline & validating through 3rd party assurance. Copy Link: https://www.dcmshriram.com/sustainability/sustainability-reports 10. Miscellaneous • All environment clearances granted to us have been made public by giving advertisement in local daily newspapers and all our EC's are in public domain on website. • We have provided the copies of environment clearance to local sarpanch. • Our six monthly EC compliance reports along with all monitoring results are published on company website. • We are displaying the AAQM results on digital display boards displayed outside our main gate at prominent locations. • We are submitting six-monthly compliance report to the ministry offices. • We are submitting the environment statement in Form-V to GPCB on annual basis. • We are complying with all the requirements of GPCB and other regulatory bodies. • We are complying with the commitment and recommendations of EIA/EMP and submitted compliance reports as required after receiving the EC. • We comply with the ministry requirements and have sought EC from ministry for further expansion of products.

		We ensure to comply with all the other requirements of office memorandum (OM) published by MoEF&CC vide no.F.No.22-34/2018-IA,III dated 09/08/2018.
122	The project proponent shall allocate the separate fund for Corporate Environment Responsibility (CER) in accordance to the MoEFCC's Office Memorandum No. F.No.22-65/2017-lA.III dated 01/05/2018 to carry out the activities under CER in affected area around the project. The entire activities proposed under CER shall be monitored and the monitoring report shall be submitted to the regional office of MoEFCC as a part of half-yearly compliance report and to district collector. The monitoring report shall be posted on the website of the project proponent.	Complied. CER expenses have been fixed and communicated to the concerned offices. The entire activities proposed under CER are being monitored and the monitoring report is submitted to the regional office of MoEFCC as a part of half-yearly compliance report and to district collector. The monitoring report is also being posted on the website of the project proponent.
123	Rain water harvesting of surface as well as rooftop runoff shall be undertaken and the same water shall be used for the various activities of the project to conserve fresh water as well as to recharge ground water. Before recharging the surface run off, pre-treatment must be done to remove suspended matter.	Complied, We have implemented rainwater harvesting system in our unit and use the harvested rain water for green belt development as per requirement.
124	The unit shall join and participate financially and technically for any common environmental facilities / infrastructure as and when the same is taken up either by the Industrial Association or GIDC or GPCB or any such authority created for this purpose by the Govt. / GIDC	Complied. We are partnering with GIDC, NCT for various common environmental facilities like, Jhagadia pipeline project, buffer storage, etc. We are an active member of Jhagadia industrial Association and BEIL. We shall continue our active participation in any such upcoming requirements.
125	Application of solar energy shall be incorporated for illumination of common areas, lighting for gardens and street lighting in addition the provision for solar water heating system shall also be provided.	Complied We have installed solar lights on internal roads of the plant. We have signed an agreement for 50.46 MW of hybrid wind / solar renewable energy from renew power for its chlor-alkali manufacturing facility.
126	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.	Noted & complied. We are ensuring to use the green belt area specifically for greenbelt development. Photos of green belt is attached as ***Annexure-16***.
127	AII the commitments / undertakings given to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.	Complied
128	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	Noted.

	for the purpose for the environmental protection and management.	
129	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.	Complied. SOPs have been developed and implemented such that in case of failure of any pollution control device, the concerned equipment/ plant will be stopped and will not be started till the concerned device is rectified.
130	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.	Noted. We are following all the regulation by GPCB, CCA compliance.
131	During material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water.	Complied. Garland drain has been provided in all areas to avoid mixing of accidental spillage in storm drain or domestic water.
132	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.	Complied. All the work areas, storage areas are provided with RCC flooring and waste storage areas are also covered as per standard guidelines to prevent soil contamination. In Chemical storage area and chemical handling area, the RCC floor and collection & recovery system with bund walls are in placed. 
133	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.	Complied. We are regularly ensuring the same and corrected/arrested as soon as possible in case of any leak/ spill occurred.
134	No further expansion or modifications in the plant likely to cause environmental impacts shall be carried out without obtaining prior Environment Clearance from the concerned authority.	Noted for compliance. We will opt for Prior Environmental Clearance before doing any further expansion/modification as per requirement.
135	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	Noted. We have obtained CCA valid till 03.07.2026 from GPCB under the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act) Act, 1981, The Environment (Protection) Act, 1986, Hazardous & other wastes (Management, Handling & Transboundary movement) rules, 2016 of

	Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules	our plant. We are complying with the Public Liability Insurance Act, 1991, as well as above referred Acts / Rules along with their amendments.
136	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.	Complied. The Companies (Corporate Social Responsibility Policy) Rules, 2014, We are conducting various social development activities in villages as a part of Corporate Social Responsibility (CSR). These activities are being implemented in association with partner agencies. The Company is making a positive impact on society by implementing programs on Preventive Health Care & Sanitation, Environment & Sustainability, Education & awareness, Skill Development & Livelihood, and Rural Development. Agri. Skilling program: We have been supporting over 200 farmers by demonstrating innovative package of practices aiming to increase farmer's family income at-least by 50%. Live-stoke development program : We have been supporting animal husbandry practicing families of entire Jhagadia taluka by providing need based support for artificial insemination and overall cattle health aiming to increase family income by 30%.  Donation of Equipment Supported 25 women entrepreneurs by donating sewing machines on completion of training under Govt. scheme. Women Empowerment: We have been providing series of training and exposure visits to the adolescent girls of Jhagadia taluka on life skills, legal rights, govt. schemes, self-defence and financial literacy. The program has also covered all the adolescent girls of neighbouring

		regions like entire Ankleshwar taluka and Bharuch urban. Total 13000 gilrs have been training as on date.  Health & Sanitation Initiated solid waste management activities at Jhagadia with an aim to established "Zero waste Zero cost" model covering entire Jhagadia and Sultanpura Group Gram Panchayat.  
137	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.	Complied We are complying all the recommendation mentioned in EMP Report and Risk assessment study report. Copy of the Risk assessment report with their compliance status is attached as ***Annexure-25*****.**
138	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.	Complied. We have earmarked separate fund for the same and the monitoring is being done on regular basis. CER fund is allocated as required for carrying out Environment project / assignment. Management is committed to comply all the requirements. Environment funds are not diverted for any other purpose.
139	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	Noted. The Public has been informed about development through local newspapers. Copy of the paper cuttings have been submitted to your good office. Copy of the paper cuttings have been submitted

	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.	to your office, vide letter no. SAC-SHE-E-FL-06/June-22/02, dated: 13th June-22. Advertisement published in "Times of India" on dt: 11.06.2022 and local newspaper "Sandesh" on dt: 11.06.2022 Photos is attached as below : 
140	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 1st June and 1st December of each calendar year.	Complied. Regular Half yearly compliance report is submitted to MoEFCC-RO, CPCB-ZO, SEIAA (Gujarat) and GPCB by mail and hardcopies before 1st June and 1st December every year as per the requirement. Last report for the period Oct'24 to March'25 was submitted, vide our letter no. SAC-SHE-E-FL-08/MAY'25/01, on 28.05.2025
141	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.	Noted.
142	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.	Noted. We have received CCA NO: 137464 dated 29.10.2024 and adhere to the conditions mentioned in the CCA.
143	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.	Noted.
144	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.	Noted.
145	The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project	Complied. We have received amended consent from GPCB CCA NO: 137464 dated 29.10.2024 for our caustic soda expansion and new manufacturing plants of ECH & H2O2.
146	This environmental clearance is valid for seven years from the date of issue.	Noted.

147	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.	Noted.
148	Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application makes this environment clearance cancelled	Noted.
	B.4 Compliance of environmental clearance / reporting / administration / appeal	
149	Project proponent shall inform to all the concerned authorities including Municipal Corporation and District Collector and shall also give wide publicity through advertisement in minimum Mo local newspapers within seven days, about the Environment Clearance order accorded.	Point noted and being complied with. The Public has been informed about this through local newspapers. Copy of the paper cuttings have been submitted to your office, vide letter no. SAC-SHE-E-FL-06/June-22/02, dated: 13th June-22. Advertisement published in "Times of India" on dt: 11.06.2022 and local newspaper "Sandesh" on dt: 11.06.2022. Kindly refer photographs attached in point no. sr. no.139.
150	Project proponent shall appoint a key person in the organization who shall be responsible for compliance of above condition fully on behalf of the proponent. It will not mean that appointing a key person will exempt the project proponent from the responsibility of compliance. Any change in key person shall immediately be informed to SEIAA and all concerned authorities.	Point noted.
151	Designated key person shall submit six monthly compliance reports to SEIAA/SEAC, MOEF&CC, GPCB and Nodal Department of the Government.	Noted & complied. Six monthly compliance report is submitted to SEIAA/SEAC, MOEF&CC, GPCB and Nodal Department of the Government on regular basis through designated and authorized person of our site. Last report for the period Oct'24 to March'25 was submitted, vide our letter no. SAC-SHE-E-FL-08/MAY'25/01, on 28.05.2025
152	The Nodal Department or any authority or officer authorized by MOEF&CC/SEIAA can inspect the site of the project and all the facilities, for verification of compliances of environment clearance conditions.	Noted.
153	In case of violation reported upon, the project proponent shall be responsible for all the legal actions as per Environment Protection Act, 1986 including	Noted.

	SEIAA may cancel, withdraw or keep in abeyance, the Environment Clearance accorded.	
154	Any person including the project proponent affected by this Environment Clearance order may file appeal to Honorable National Green Tribunal West Zone branch, Pune, preferably within a period of thirty days frog the date of issue of Environment Clearance as prescribe under section 16 of National Green Tribunal Act 2010.	Noted.
155	All complains and public grievance or representations may be addressed to SEIAA/SEAC in' the email addresses (a) msseiaagj@gmail.com& (b) seacgujarat@gmail.com	Noted.