

Admark Polycoats Pvt. Ltd.
Compliance of EC dated 01st September, 2009 (Ref.: F. No.: J-11011/91/2009-IA-II(I))
Period: Jul-2017 till Dec-2017

Sr. No.:	Project Condition	Compliance Status
A	Specific Conditions	
i.	The company shall send all the wastewater containing amines to M/s Multichem, Plot No.: 104, GIDC, Nandesari Gujarat, and shall not involve itself in amine recovery or wastewater treatment in the premises for wastewater containing amines.	<ul style="list-style-type: none"> ➤ <i>The entire quantity of wastewater containing amines is sent for amine recovery to M/s Multichem, in GIDC Nandesari. M/s Multichem is holding valid CC&A from GPCB (AWH-52980).</i> ➤ <i>The details pertaining to amine water sent to M/s Multichem for the past 6 months for recovery are shown herewith as annexures.</i>
ii.	The water requirement and wastewater generation shall not exceed 26.0 KLD and 3.6 KLD respectively. The wastewater 1.4 KLD generated from utilities shall be sent to CETP of M/s EICL, Umraya Gujarat.	<ul style="list-style-type: none"> ➤ <i>The water consumption data for this period are attached herewith as annexures.</i> ➤ <i>Industrial wastewater from process is being sent to M/s Multichem for amine recovery.</i> ➤ <i>Wastewater from utilities is being sent to CETP of EICL, Umaraya. Details pertaining to disposal at EICL for this period are included herewith as annexures.</i>
iii.	The Company shall obtain permission for drawl of 26.0 KLD ground water from the CGWA/CGWB within three months from date of issue of this letter and a copy shall be submitted to the Ministry's Regional Office at Bhopal.	<ul style="list-style-type: none"> ➤ <i>The location of the unit is in Padra Taluka, Vadodara District, Gujarat, which is under 'Safe' Category, based on excerpt from Dynamic Ground Water Resources of India Report of 2011.</i> ➤ <i>Also, as per then available guidance document on CGWA website, the industry located in safe area and having groundwater abstraction less than 1000 KLD were exempted from obtaining NOC.</i> ➤ <i>Thereafter, based on the Public Notice as issued by CGWA regarding compulsory application to be made to for NOC, irrespective of categorization of industries, and considering our proposed expansion plan, we have made NOC application to CGWA.</i> ➤ <i>Copy of application is shown herewith as annexures.</i>
iv.	The company shall provide the monitoring arrangement with stacks/ vents and regular monitoring shall be carried out and reports submitted to the SPCB, CPCB and Ministry's Regional Office at Bhopal.	<ul style="list-style-type: none"> ➤ <i>The unit has provided adequate monitoring arrangements with the flue gas stacks associated with LDO fired Thermic Fluid Heaters and D.G. Sets. There are no process emissions as a part of the current operations.</i> ➤ <i>The stack monitoring results are shown herewith as annexures.</i>
v.	The proponent shall upload the status of compliance of the Stipulated EC conditions, including monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office-of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant namely; SPM, RSPM, SO ₂ NO _x (Ambient levels as well as stack	<ul style="list-style-type: none"> ➤ <i>The details pertaining to grant of EC in 2009 are updated on the company website (www.admarkpolycoats.com).</i> ➤ <i>The status of compliance of EC conditions are being updated on the company website.</i> ➤ <i>The compliance reports are being sent to Regional Office of MoEF&CC in Bhopal; and will also be sent to respective CPCB zonal office as well as GPCB.</i>

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	emissions), indicated for the project shall be monitored and displayed at the convenient location near the main gate of the Company in the public domain.	
vi.	The process emissions and particulate matter from various units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	<ul style="list-style-type: none"> ➤ <i>There is no process emission as a part of the manufacturing process.</i> ➤ <i>Also, LDO is being used as a fuel for the Thermic Fluid Heater. And as per the periodic stack monitoring and analysis reports, the emission levels stay within the prescribed regulatory standards.</i>
vii.	Fugitive emissions in the work zone environment, product and raw materials storage area shall be regularly monitored. The emissions shall conform to the limits imposed by GPCB.	<ul style="list-style-type: none"> ➤ <i>Work zone monitoring is being done in line with the statutory requirements and the results indicate that the concentration is within the prescribed limits. The details pertaining to the latest work zone monitoring records are included herewith as annexures.</i>
viii.	The project authorities shall decontaminate bag/containers and shall be reuse or sold-out to GPCB registered dealers. Incineration ash shall be sent to Common TSDF at Surat. The spent oil shall be sold to authorized recyclers.	<ul style="list-style-type: none"> ➤ <i>The bags and containers are being sold out to M/s Maruti Recyclers who are recognized and registered by GPCB.</i> ➤ <i>Incinerator has been dismantled, hence incineration ash is no longer generated.</i> ➤ <i>It is a practice to send used oil to GPCB recognized oil recyclers, as and when generated and collected in sufficient quantity.</i>
ix.	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillage ages with domestic waste and storm drains.	<ul style="list-style-type: none"> ➤ <i>Transfer of chemicals is done in line with the established SOPs and with aid of vacuum pumps where required.</i> ➤ <i>Garland drains have also been constructed to ensure that domestic waste and storm drains are not contaminated.</i>
x.	The project authorities shall Develop greenbelt 33% of project area as per the guidelines of CPCB to mitigate of fugitive emissions.	<ul style="list-style-type: none"> ➤ <i>Out of present premise area, about 5000 sq.m is marked for plantation (35%).</i> ➤ <i>Tree plantation is being done and full-grown trees are already being maintained over about 800 sq.m area, rest being green space / gardens. Also, about 2900 sq.m area has been earmarked for plantation of about 300 trees.</i> ➤ <i>Photographs of the present greenbelt are included herewith as annexures.</i>
xi.	Adequate financial provision shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be	<ul style="list-style-type: none"> ➤ <i>Average amount specifically being spent for implementation of environment management system is about Rs. 18 lacs, based on past 3 years' average expenditure.</i>

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	diverted for any other purposes.	➤ <i>The unit is also holding ISO 14001 certification for its EMS.</i>
xii.	Occupational health surveillance of the workers shall be done on a regularly basis and records maintained as per the Factories Act.	<ul style="list-style-type: none"> ➤ <i>As per statutory requirement under Factories Act, the unit is engaging a qualified medical officer for conducting six monthly occupational health surveillance, for which records are being maintained.</i> ➤ <i>Few records in this regard are included herewith as annexures.</i>
xiii.	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.	<ul style="list-style-type: none"> ➤ <i>The unit has made all due arrangements for fire protection in various areas of the plant.</i> ➤ <i>The details pertaining to fire protection measures are included herewith under:</i> <ul style="list-style-type: none"> ➤ <i>All due precautions have been taken for fire protection as required under statutes as well as in line with OHSAS 18001.</i> ➤ <i>Fire fighting facilities comprising of main pump (electrical), stand by pump, diesel driven pump, Hydrant Pipeline Network, automatic fire detection and control system, Manual call points, fire alarms, fire buckets, etc. Are available as per the GFR and TAC guidelines.</i> ➤ <i>About 50 nos. of fire extinguishers - of ABC, CO2 as well as M.F. type have been placed at strategic locations within the plant.</i> ➤ <i>150 kL fire water sump is being maintained in the unit for use during any fire emergency.</i> ➤ <i>Training is imparted to employees w.r.t fire hazards, fire alarm, handling of fire extinguishers as well as regarding on-site emergency plan.</i>
xiv.	Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, Safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.	➤ <i>Due to availability of labour from local area, labour colony was not required. However, provision of requisite sanitation facility as well as drinking water were provided to the engaged labour.</i>
B	General Conditions	
i.	The project authorities shall strictly adhere to the stipulations of the SPCB/state government or any statutory body.	➤ <i>Since commencement of production operation, unit has obtained all requisite permissions from statutory bodies - CTE & CC&A from GPCB, Registration of factory and license under Factories Act, and approval from PESO; the unit is complying with the conditions thereunder; these permissions/consents</i>

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		<i>are also being renewed from time to time. Copies of the consent order are included as annexures.</i>
ii.	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	<ul style="list-style-type: none"> ➤ <i>The present production is always remaining less than 1000 MT/month as per the prevailing EC. Production details since April'17 are shown as annexures.</i> ➤ <i>We have duly made application to MoEF&CC for further expansion in manufacturing of epoxy hardeners from 1000 MT/month to 2000 MT/month.</i>
iii.	The project authorities shall strictly comply with the rules and regulations under Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as amended. Authorization from the SPCB shall be obtained for collection, treatment, storage, and disposal of hazardous wastes.	<ul style="list-style-type: none"> ➤ <i>The regulations under MSIHC, 1989 and amendments are being complied with, according to statutory permissions obtained under Factories Act.</i> ➤ <i>Unit is holding authorization from SPCB for collection, treatment, storage, and disposal of hazardous wastes vide Order No.: AWH - 59893, issued in 2014 and valid till 2018.</i> ➤ <i>Unit is also holding approval from PESO.</i>
iv.	Ambient air quality monitoring stations shall be set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the State Pollution Control Board.	<ul style="list-style-type: none"> ➤ <i>Ambient air quality station is placed near Main Gate and near weight bridge of the plant, the results are included hereunder as annexures.</i>
v.	For control of process emissions, stacks of appropriate height as per the Central Pollution Control Board guidelines shall be provided. The scrubbed water shall be sent to ETP for further treatment	<ul style="list-style-type: none"> ➤ <i>The unit has stacks associated with the Thermic Fluid Heaters (2 nos., 1 working, 1 standby), with 18 m height each. Being LDO fired TFHs with stack height as per guidelines of GPCB, APCM are not required.</i> ➤ <i>There are no process emissions and hence scrubber is not being used.</i>
vi.	<p>The company shall undertake following Waste Minimization measure :</p> <ul style="list-style-type: none"> ➤ <i>Metering of quantities of active ingredients to minimize waste.</i> ➤ <i>Reuse of by-products from the process as raw materials or raw material Substitutes in other processes</i> ➤ <i>Maximizing recoveries</i> ➤ <i>Use of automated material transfer system to minimize spillage.</i> ➤ <i>Use of "Closed Feed" system into batch reactors.</i> 	<ul style="list-style-type: none"> ➤ <i>Waste minimization measures are being implemented, details are as under :</i> <ul style="list-style-type: none"> ➤ <i>Metering is being done for the raw materials being utilized through mass flow meters for each reaction vessel.</i> ➤ <i>There is no generation of by-products from the process.</i> ➤ <i>Two stage condensers are associated with each reaction vessel so as to maximize solvent recovery.</i> ➤ <i>Vaccum feed system and double mechanical seal for pumps are installed for proper and efficient material transfer, and to prevent losses.</i>

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		➤ <i>The reactions are carried out in close feed systems only.</i>
vii.	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management, Handling and trans boundary Movement) Rules, 2008. Authorization from the SPCB shall be obtained for collection/treatment/ storage/disposal of hazardous wastes.	➤ <i>The unit has obtained due authorization from GPCB vide order no.: AWH - 59893, issued in 2014 and valid till 2018 for collection, treatment, storage and disposal of hazardous wastes, and the conditions there under are being complied with.</i>
viii.	The overall noise levels in and around the plant area shall be kept well within the standards (85 dB A) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dB (day time) and 70 dB (night time).	<ul style="list-style-type: none"> ➤ <i>The requisite noise prevention measures have been taken to ensure that noise levels within the plant area remain within limits.</i> ➤ <i>The ambient noise levels are being monitored regularly on quarterly basis and based on the reports, it is conforming to the limits prescribed under Factories Act.</i> ➤ <i>Noise level results are included herewith as annexures.</i>
ix.	A separate Environmental Management Cell equipped with full-fledged laboratory Facilities shall be set up to carry out the environmental management and monitoring functions.	➤ <i>The established Environment Management Cell, headed by GM, supervises the environmental management aspects as well as monitoring functions.</i>
x.	The project authorities shall provide rainwater harvesting system and ground water recharge.	➤ <i>For rain water harvesting, system consisting of one recharge well has been provided & photograph of the same is shown hereunder as annexures.</i>
xi.	The implementation of the project vis-a-vis environmental action plans shall be monitored by Ministry's Regional Office SPCB/CPCB. A six monthly compliance status report shall be submitted to monitoring agencies.	➤ <i>Monitoring of parameters is being done on regular basis, and compliance report was last submitted in May, 2017.</i>
xii.	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both on hard copies as well as by-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB.	➤ <i>Monitoring of parameters is being done on regular basis and compliance report was last submitted in May, 2017.</i>
xiii.	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local Body and the Local NGO, if any, from whom suggestions/representations if any, were received while processing the proposal. The clearance letter shall also put up on the	<ul style="list-style-type: none"> ➤ <i>In absence of any specific representations from the said authorities / bodies, submission of EC clearance letter was not required.</i> ➤ <i>The details pertaining to grant of EC have been displayed on company website. Copy of the EC is also put up on website. (www.admarkpolycoats.com)</i>

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	website of the Company by the proponent.	
xiv.	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at Website of the Ministry at http://envfor.nic.in . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the Ministry's Regional Office.	<ul style="list-style-type: none"> ➤ <i>Complied.</i> ➤ <i>Advertisement was published regarding grant of EC for the project through Sandesh and Indian Express newspapers dated 25/09/2009, after receipt of hardcopy of EC.</i> ➤ <i>Copy of EC has been updated on company website (www.admarkpolycoats.com).</i>
xv.	The environmental statement for each financial year ending 31 st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986 as amended subsequently, shall also be put on the website of the Company along with the status of compliance of EC conditions and shall also be sent to the respective regional Office of the MoEF by-mail.	<ul style="list-style-type: none"> ➤ <i>Being complied.</i> ➤ <i>Form V (Environment Statement) is being updated through online portal of GPCB & copy is also available on company website. Same will also be emailed to MoEF RO.</i>
xvi.	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	<ul style="list-style-type: none"> ➤ <i>All proper approvals were duly sought from concerned authorities prior to start of the project.</i>