



F.No.IA-J-11011/175/2019-IA-II(I)
Government of India
Ministry of Environment, Forest and Climate Change
(Impact Assessment Division)

By Speed Post/Online

Indira Paryavaran Bhawan
 Jorbagh Road, New Delhi - 110003

Dated: 10th November, 2020

To

M/s Benzo Chem Industries Pvt. Ltd.
 Plot No. B-26,27 & B-14,15
 Malkapur MIDC, Dasarkhed
 District: Buldhana, Maharashtra-443 101

Email: zope@benzochem.co.in

Sub: Expansion of Pharmaceuticals, Speciality and Agrochemical intermediates manufacturing from 58 TPM to 230 TPM at Plot No. B-26,27 & B-14,15, Malkapur MIDC, Dasarkhed, Taluka Malkapur, District Buldhana, Maharashtra by M/s Benzo Chem Industries Pvt. Ltd. -Environmental Clearance - reg.

Sir,

This has reference to your proposal No.IA/MH/IND2/103300/2019 dated 10th June 2020, submitting the EIA/EMP report on the above subject matter.

2. The Ministry of Environment, Forest and Climate Change has examined the proposal for environmental clearance to the project for Expansion of Pharmaceuticals, Speciality and Agrochemical intermediates manufacturing from 58 TPM to 230 TPM by M/s Benzo Chem Industries Pvt. Ltd. in an area of 33350 sqm located at Plot No. B-26, 27 & B-14,15, Malkapur MIDC, Dasarkhed, Taluka Malkapur, District Buldhana, Maharashtra.

3. The details of products and capacity are as under:

S. No.	Product	Existing (TPM)	Proposed (TPM)	Total (TPM)
1	<u>Agrochemical Intermediate:</u> Existing: (i). 2,5 Di Methyl Phenyl Acetyl Chloride, (ii). 2,4 Di Chloro Benzaldehyde, (iii). Ortho Chloro Phenyl Acetic Acid, (iv). 2,4,6 Tri Methyl Phenyl Acetyl Chloride, (v). Para Chloro Phenyl Acetic Acid, (vi). 2,4 Di Chloro Phenyl Acetic Acid, (vii). Para Chloro Benzyl Cyanide, (viii). 2,4 Di Chloro Phenyl Acetyl Chloride, (ix). Para Chloro Benzo Tri Chloride, (x). Para Chloro Benzyl Chloride, (xi). Ortho Methyl Benzyl Chloride, (xii). 2,5 Di Methyl Phenyl Acetic Acid	35	102	137

	<p>Proposed:</p> <ul style="list-style-type: none"> (i). Isopropyl (4-Chlorophenyl) acetyl chloride (CPIC), (ii). 1-Naphthyl Acetonitrile, (iii). $\alpha,\alpha,\alpha',\alpha'$ Tetra Chloro Ortho Xylene (iv). Para Chloro α-isopropyl Phenyl Acetic Acid (CPIA) (v). Para Chloro Benzyl Cyanide 75% Solution in N-Butyl Acetate, 	---		
2	<p>Pharmaceutical Intermediates:</p> <p>Existing:</p> <ul style="list-style-type: none"> (i). Para Chloro Benzaldehyde, (ii). Meta Chloro Benzyl Chloride; (iii). Meta Chloro Benzyl Cyanide, (iv). Meta Chloro Phenyl Acetic Acid, (v). Meta Chloro Benzaldehyde, (vi). 2,4 Di Chloro Benzyl Cyanide; (vii). 2,4 Di Chloro Benzyl Chloride, (viii). Ortho Methyl Benzyl Cyanide, (ix). Ortho Methyl Phenyl Acetic Acid, (x). Ortho Chloro Benzyl Chloride, (xi). Ortho Chloro Benzyl Cyanide, (xii). Ortho Chloro Benzaldehyde, (xiii). Methyl 2-Chloro Phenyl Acetate 	20	60	80
	<p>Proposed:</p> <ul style="list-style-type: none"> (i). 2-Phenyl Acetyl Chloride, (ii). 2-Bromo Benzyl Cyanide, (iii). 4-Bromo Benzyl Cyanide (iv). 3,4 Di Chloro Benzyl Cyanide (v). Para Methyl Benzyl Chloride (vi). Para Methyl Benzyl Cyanide (vii). Para Methyl Phenyl Acetic Acid 	---		
3	<p>Speciality Chemical Intermediate:</p> <p>Existing:</p> <ul style="list-style-type: none"> (i). Benzaldehyde 2,4 Di Sulphonic Acid Di Sodium Salt (Powder), (ii). Benzaldehyde 2,4 Di Sulphonic Acid Di Sodium Salt (Liquid), (iii). Benzaldehyde Ortho Sulphonic Acid Sodium Salt 	3	10	13

	Proposed: (i). Ortho Anisoyl Chloride 75% Solution in Ethylene Dichloride, (ii). $\alpha\alpha$ Di Chloro Para Xylene, (iii). Para Hydroxy Benzaldehyde			
	Total	58	172	230

4. The existing land area is 33350 sqm, which will cater to the proposed expansion. Industry has developed greenbelt in an area of 3340 sqm and will develop greenbelt area of 7679 sqm, totaling to 11019 sqm, covering 33% of total project area. The estimated project cost is Rs. 28.22 crores including existing investment of Rs. 16.22 crores. Total capital cost earmarked towards environmental pollution control measures is Rs. 5.35 crore and the recurring cost (operation and maintenance) will be about Rs. 1.09 crore per annum. The project will lead to employment for 242 persons after expansion. Industry proposes to allocate Rs. 12 lakhs towards Corporate Environmental Responsibility (CER).

5. There are nonational parks, wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. within 10 km from the project site. Purna river flows at a distance of 4.24 km in North direction.

6. Total water requirement is estimated to be 424.9 cum/day, which includes fresh water requirement of 220.9 cum/day, proposed to be met from Malkapur MIDC water supply. Effluent of 69.7 cum/day will be treated through ETP, MEE, Stripper & RO; 64 cum/day will be reused. There will be no discharge of treated/untreated waste water from the unit, and thus ensuring Zero Liquid Discharge.

Power requirement after expansion will be 1000 KVA and will be met from Maharashtra State Electricity Distribution Company Limited (MSEDCL). Existing unit has 1 DG set of 380 KVA capacity which will be replaced & DG set of 1000 KVA will be set up and to be used as standby during power failure after expansion. Stack of height 7.0 m will be provided as per CPCB norms to the proposed DG sets.

Existing unit has 6 TPH Coal/Agro waste fired boiler & 6 Lakh Kilo Calorie/Hr Thermic Fluid Heater. Additionally, 10 TPH Coal/Agro waste fired boiler & 6 Lakh Kilo Calorie/Hr Coal/Agro waste fired & 2 Lakh Kilo Calorie/Hr LSHS fired Thermic Fluid Heaters will be installed. Multi cyclone separator & bag filter with a stack of height of 30.5 m will be installed for controlling the particulate emissions within the statutory limit of 115 mg/Nm³ for the boilers & Stack of 11 m height will be provided along with Bag filter & Oil/air pre heater to maintain emission concentrations within the statutory limit of 150 mg/Nm³ for the thermic fluid heaters.

Gases and vapors from manufacturing process are identified source of emission, which will be passed through scrubbers (HCL/Cl₂ & Ammonia). Additionally, one scrubber (HBr) will be installed to mitigate the process emissions from expansion activity. The scrubbed gases from manufacturing process will be released through 3 stacks each with 12 m height.

7. The project/activities are covered under category A of item 5(b) 'Pesticides industry and Pesticide specific intermediates' and item 5(f) 'Synthetic organic chemicals industry' of the

Schedule to the Environment Impact Assessment Notification, 2006, and requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

8. Standard Terms of References (ToR) was issued by the Ministry vide letter dated 18th June, 2019. Public hearing is exempted as the project site is located in the notified Industrial area. It is reported by the project proponent that no litigation is pending against the proposal.

9. The proposal was considered by the Expert Appraisal Committee (Industry-2) in its meetings held on 14-16 July, 2020 and 15-17 September, 2020 in the Ministry, wherein the project proponent and their accredited consultant M/s Sadekar Enviro Engineers Pvt Ltd presented the EIA/EMP report as per the ToR. The Committee found the EIA/EMP report complying with the ToR and recommended the project for grant of environmental clearance.

10. The EAC, constituted under the provision of the EIA Notification, 2006 and comprising of Experts Members/domain experts in various fields, have examined the proposal submitted by the Project Proponent in desired form along with EIA/EMP report prepared and submitted by the Consultant accredited by the QCI/ NABET on behalf of the Project Proponent.

The EAC noted that the Project Proponent has given undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environmental concerns and the projected scenario for all the environmental components. The Committee has found the baseline data and incremental GLC due to the proposed project within NAAQ standards. The Committee has also deliberated on the CER plan and found to be addressing the issues in the study area. The Committee has suggested that the storage of toxic/explosive raw material shall be bare minimum in quantity and inventory. The Committee has considered the opinion of Institute of Chemical Technology, Mumbai that the intermediates of API and agrochemical can be produced at the same site. The Committee has found the additional information submitted by the project proponent to be satisfactory and addressing the issues raised by the Committee.

The EAC has deliberated the proposal and has made due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC have found the proposal in order and have recommended for grant of environmental clearance.

11. The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/ permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

12. Based on the proposal submitted by the project proponent and recommendations of the EAC (Industry-2), Ministry of Environment, Forest and Climate change hereby accords environmental clearance to the project for **Expansion of Pharmaceuticals, Speciality and Agrochemical intermediates manufacturing from 58 TPM to 230 TPM by M/s Benzo Chem Industries Pvt. Ltd. at Plot No. B-26,27 & B-14,15, Malkapur MIDC, Dasarkhed, Taluka Malkapur, District Buldhana, Maharashtra**, under the provisions of the EIA Notification, 2006, subject to the compliance of terms and conditions as under:-

- (i) The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.
- (ii) As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises. Treated effluent shall be reused in the process/utilities. Treated Industrial effluent shall not be used for gardening/greenbelt development/horticulture.
- (iii) Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
- (iv) The storage of toxic/explosive raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
- (v) Implementation of outcome of Process safety and risk assessment studies which carried out by using advanced models, and the mitigating measures shall be undertaken/implemented accordingly.
- (vi) Occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
- (vii) Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.
- (viii) The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.
- (ix) Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (x) Volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.99% with effective chillers/modern technology.

- (xi) Total fresh water requirement shall not exceed 220.9 cum/day proposed to be met from Malkapur MIDC water supply. Necessary permission in this regard shall be obtained from the concerned regulatory authority.
- (xii) Storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.
- (xiii) The company shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapour recovery system. (f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.
- (xiv) The green belt of at least 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Records of tree canopy shall be monitored through remote sensing map.
- (xv) As per the Ministry's OM dated 30.09.2020 superseding the OM dated 01.05.2018 regarding the Corporate Environmental Responsibility, and as per the action plan proposed by the project proponent to address the socio-economic and environmental issues in the study area, the project proponent shall provide RO drinking water facility, infrastructure and educational assistance to the schools in Malkapur, Bhalegaon and Wiwara villages. The action plan shall be completed within three years as proposed.
- (xvi) A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.

12.1 The grant of environmental clearance is further subject to compliance of other general conditions as under:-

- (i) No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. 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/SEIAA to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
- (ii) The energy source for lighting purpose shall be preferably LED based, or advance having preference in energy conservation and environment betterment.
- (iii) The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one station each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.
- (iv) The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be followed.

- (v) The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
- (vi) The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and to utilize the same for process requirements.
- (vii) Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
- (viii) The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented.
- (ix) The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
- (x) A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.
- (xi) The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
- (xii) A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
- (xiii) The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
- (xiv) The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by e-mail.
- (xv) 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/Committee and may also be seen at Website of the Ministry and at

<https://parivesh.nic.in/>. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.

- (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.
- (xvii) This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.

13. The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental clearance, if implementation of any of the above conditions is not found satisfactory.

14. 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 the Environment (Protection) Act, 1986.

15. 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.

16. The above conditions shall be enforced, *inter-alia* under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.

17. This issues with approval of the competent authority.

(डा. आर. बी. लाल)
(Dr. R. B. Lal)
पर्यावरण, वन्यजीव संरक्षण, जल संधारण, पर्यावरण, वन्यजीव संरक्षण, जल संधारण
Min. of Environment, Forest and Climate Change
भारत सरकार, नई दिल्ली
Govt. of India, New Delhi

10/11/2020

Copy to: -

1. The Deputy DGF (C), MoEF&CC Regional Office(WCZ), Ground Floor, East Wing, New Secretariat Building, Civil Line, Nagpur - 1
2. The Secretary, Environment Department, Government of Maharashtra, 15th Floor, New Administrative Building, Mantralaya, Mumbai - 32
3. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 32
4. The Member Secretary, Maharashtra Pollution Control Board, Kalpataru Point, 3rd and 4th

Floor, Opp. Cine Planet, Sion Circle, Mumbai - 22

5. The District Collector, District Buldhana (Maharashtra)
6. Guard File/Monitoring File/Website/Record File


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