Compliance report of Environment Clearance (F No. IA-J-11011/350/2018-IA- II(i) dated 17.06.2021)
Terms and Conditions

Date of updation: 20.12.2021

<table>
<tr><th>Sr. No.</th><th>Terms and Conditions</th><th>Compliance status</th></tr>
<tr><td>10</td><td>The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 its amendments. It does not tantamount/construe to approval/consent/ permissions etc. , required to be obtained or standard / conditions to be followed under any other Acts/Rules/Subordinate legislations, etc., as may be applicable to the project.

The project proponent shall obtained necessary permission as mandate 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.</td><td>Noted, The site will obtained necessary permission from the state pollution control board as per the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 as applicable prior to construction and operation of the project.

The site has got Consent to established for Expansion of following projects.

<table>
<tr><td>Product/ Project</td><td>Existing permitted capacity</td><td>Additional production capacity</td><td>Total production capacity after expansion</td></tr>
<tr><td>Cinnamic Aldehyde</td><td>3000 MTPA</td><td>3000 MTPA</td><td>6000 MTPA</td></tr>
<tr><td>Benzyl Acetate</td><td>7200 MTPA</td><td>2800 MTPA</td><td>10000 MTPA</td></tr>
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</td></tr>
<tr><td>11</td><td colspan="2">Based on the proposal submitted by the project proponent and recommendation of the EAC (Industry-3), Ministry of Environment, Forest and Climate Change hereby accord Environmental clearance to the project for Expansion of Chemical Industry by M/s Lanxess India Private Limited at Birlagram, Tehsil Nagda, District Ujjain, Madhya Pradesh, under the provisions of the EIA Notification, 2006, subject to the compliance of terms and conditions as under.</td></tr>
<tr><td>11.1</td><td>The company shall comply with 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.</td><td>All the environmental protection measures and safeguards proposed in the EIA/ EMP shall be implemented appropriately and maintained. This cover following actions.
1. Regular monitoring of air, water, Noise, soil and Ecology.
2. Regular meeting of Environment Management Cell
3. Monitoring of Air pollution control measures.
4. Effort to reduce water consumption.
5. Provision of rain water harvesting.
6. To maintained Zero liquid discharge.
7. Reuse of waste water after treatment.
8. Effective operation of waste water treatment facilities like ETP, STP, PTRO, Evaporator.
9. Green cover will be increase by planting more trees.</td></tr>
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11.2	This Environmental clearance is granted subject to outcome of Hon'ble High Court, Hon'ble NGT and any other Court of law, if any, as may be applicable to this project.	Noted.
11.3	As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharge outside the premises. Treated Effluent shall be reused in the process/utilities. Treated industrial effluent shall not be used for gardening/greenbelt development / horticulture.	The site will maintained "Zero liquid discharge" status. Treated Effluent shall be reused in the process/utilities. No treated effluent shall be use for gardening/ greenbelt development / horticulture.
11.4	Continuous online (24X7) monitoring system for stack emission 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 meter in the channel / drain carrying effluent within the premises.	Continuous online (24X7) monitoring system for stack emission has been installed for flue gas discharge of Incinerator stack. Erection work of additional stack monitoring system for Co-gen and HCL stack have been completed. It shall be commissioned and connect with CPCB and MPPCB server after successful testing and calibration. Since the site is Zero liquid discharge, this is not applicable.
11.5	The storage of toxic/hazardous 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.	Hazardous material quantity and days of storage are as under.

Raw material storage with days quantity:

Raw Material	Maximum Storage Capacity	stored normally	Unit	Days of storage
Toluene Nitration Grade	1740	1392	MT	10
Liquid Chlorine	Nil	Nil	MT	Chlorine supplied via pipe line from neighbouring industry
Azo-bis-isobutyronitrile (AZDN)	2	2	MT	30
Caprolactum	5	5	MT	80
Benzyl Chloride	158	140	MT	1.0
D-Benzyl Ether (Captive Generation)	18	16	MT	2
Sodium Benzoate (Captive Generation)	50	In plant	MT	10
Benzal Chloride (Captive Generation)	75	In plant	MT	1
Benzaldehyde	195	183	MT	4.0
CINNAMIC ALDEHYDE	38	38	MT	3.0
Sodium Acetate (Tri-hydrate)	120	120	MT	8
Tetera Butyl Ammonium Bromide - (TBAB)	5	5	MT	30
Boric Acid	10	10	MT	30
Acetic Anhydride	80	72	MT	15
Triehtylamine	1.5	1.5	MT	30.0
98% Sulphuric Acid	20	10	MT	20
Sodium Carbonate (Na2CO3)	50	50	MT	10
Acetaldehyde	20	16	KL	3.0
Caustic Soda Lye	24	20	MT	10.0
Acetic Acid	2	2	MT	60

Finished goods material storage with days quantity:

List of finished product	Maximum storage capacity	Stored normally	Unit	Days of storage
Benzyl Chloride	160 KL	140	MT	2.0
Benzal Chloride	60 KL	0	MT	0
Benzaldehyde	195 KL	183	MT	4.0
Benzyl Alcohol	320 KL	300	MT	4.0
Benzyl Acetate	80 KL	76	MT	4.0
Di Benzyl Ether	20 KL	0	MT	0
Benzyl Benzoate	60 KL	60	MT	15
Cinnamaldehyde	40 KL	38	MT	3.0
Hydrochloric Acid	1200 KL	1545.6	MT	3.0
Sodium Benzoate	20 MT	20	MT	5.0

11.6	Occupational health center for surveillances of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers and employees shall be provided with required safety kits/masks for personal protection.	• The fully equipped Occupational health center of surveillances of the worker's health has been already set up and functioning. • The health data of medical surveillances program are being used for deploying duties of the workers. • Appropriate personal protective equipments are provided to all the workers for safe working.
11.7	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.	Safety trainings are being provided to all the employees to educate them about health and safety aspects of chemical handling. Practical and visual training modules are being used for training for effective communication.
11.8	The unit shall make the arrangement for protection of possible fire hazardous during manufacturing process in material handling. Fire-fighting system shall be as per the norms.	In order to control fire emergency the site has made following arrangement. It is meeting local firefighting norms. • Fire NOC has been taken from Directorate of Urban administration and development, Bhopal, Madhya Pradesh. • Fire water storage capacity 1500 KL made available. • Two fire tender with foam and fire water spraying facility are available at site. • Fire pumping station with electrical and diesel operated fire engine is available to keep pressurized fire hydrant system continuously at site. • Appropriate trained fire fighters and qualified firemen are available at site 24/7. • Fire extinguishers have been provided at conspicuous place in adequate numbers as per MP Factory rules. • All the storage tanks and reactors containing highly flammable liquids have been covered with automatic fire water sprinkler system. • Coal and finished product storage area have been covered with automatic fire water sprinkler system. • All the process equipment and storage tanks handling flammable liquids are earthed to dissipate static charge. • Lighting arrestors system have been provided to all the building and storage area. • Fire alarm system and manual call point system have been provided in the plant.

11.9	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) Solvent 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 flam proof. The solvent storage tanks shall be provided with breather valves to prevent losses. F) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	A) All the reactors and storage have chilled or cooling water circulation system. B) All the reactors and solvent handling pumps are installed with mechanical seal to prevent leakages. C) Flammable liquids are being stored at separate space with all required safety measures. D) Proper earthing has been provided to all the electrical equipments and flammable liquid handling equipments. E) Flame proof electrical installation have been provided to all the plant and storage area as per hazard area classification. Breather valves are provided to the storage tanks containing flammable liquid. F) Toluene storage tanks are connected with vent condensers with chilled brine circulation.
11.10	Volatile organic compounds (VOCs) Fugitive emissions shall be controlled at 99.99% with effective chillers/ modern technology.	Appropriate measures have been taken to control VOCs at maximum level by providing effective chillers and modern technology to each process and storage.
11.11	As proposed water requirement for industrial use shall be met from STP treated domestic wastewater from local areas and steam condensate water from steam. Drinking water requirement shall be met through external fresh water suppliers.	Proposed water requirement shall be met from STP and steam condensate.
11.12	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 process in the unit. No recharge shall be permitted within the premises. Process effluent / any wastewater shall not be allowed to mix with storm water.	Rain water harvesting system shall be provided by collecting rain water of roof top in storage tank. The harvested water shall be use for process. We are not recharging storm water at site and we shall in future also that no recharge will be done within site. We shall ensure that no process effluent and waste water mixed with storm water.
11.13	The company shall under take waste minimization measures as below : A. Metering and control of quantities of active ingredients to minimize waste; B. Reuse of bi-products from the process as raw material substitutes in other process. C. Use of automated filling to minimize spillage. D. Use of Close Feed system into batch reactors. E. Venting equipment through vapor recovery	Following waste minimization measures shall be ensured. A. Metering and control of quantities of active ingredients to minimize waste; B. Reuse of bi-products from the process as raw material substitutes in other process. C. Use of automated filling to minimize spillage. D. Use of Close Feed system into batch reactors. E. Venting equipment through vapor recovery system.

	system. F. Use of high pressure hoses for equipment clearing to reduce wastewater generation.	F. Use of high pressure hoses for equipment clearing to reduce wastewater generation.
11.14	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/ adjacent areas. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. Record of tree canopy shall be monitored through remote sensing map. Tree have to be planted with spacing 2m X 2m and number of trees have to be increased accordingly. The plant species can be selected that will give better carbon sequestration. All tree must be planted with in first year.	• Green belt has been developed as per proposed plan submitted in EIA report. Further tree plantation process is in progress as per plan submitted to MOEF. • Nearly 33% of total project area shall be covered with tree plantation. • The plant species can be selected that will give better carbon sequestration.
11.15	The activities and the action plan proposed by the project proponent to address the socio-economic /public hearing issues in the study area, shall be completed as per the schedule presented before the Committee and as described in the EMP report in letter and spirit.	The action plan proposed for Socio-economic and public hearing issues shall be completed as per the schedule.
11.16	A separate Environmental Management Cell (having qualified person with Environment Science /Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facility shall be set up to carry out the Environmental Management and Monitoring functions.	A separate Environmental Management Cell chaired by Vice President – Manufacturing are already set up.
11.1	**General Conditions**	
11.1.1	No further expansion or modification 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 deviation or alterations , a fresh reference shall be made to the Ministry /SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	No expansion or modification in the plant, other than mentioned in issued Environment Clearance shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviation or alterations , a fresh reference will be made to the Ministry /SEIAA, as applicable.
11.1.2	The project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning Preparedness and Response) Rule, 1996, and Hazardous and Other Waste (Management	The factory will comply all the applicable rules stipulated in MSIHC rules, the Chemical Accidents (Emergency Planning Preparedness and Response) Rule, 1996, and Hazardous and Other Waste (Management and Transboundary Movement) Rule, 2016 and other rules notified under various Acts.

	and Transboundary Movement) Rule, 2016 and other rules notified under various Acts.	
11.1.3	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.	Energy conservation program for plant lighting is followed by using LED lights in place of conventional lights. Total fitting changes in recent past = 700 nos. Total annual savings in KW = 202517 KWH
11.1.4	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 level shall confirm to the standard prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75dBA (Day time) and 70dBA (Night time).	An effective engineering controls are taken to minimize noise level and to ensure ambient noise level standard.
11.1.5	The company shall undertake all relevant measures for improving the socioeconomic conditions of the surrounding area. The activities shall be under taken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	The LANXESS has already taken many CSR project to improve socio-economic environment and welfare in surrounding area. Brief list of CSR is as follow. **CSR activities done by LANXESS India Private Limited** ➢ Supporting education of children at different villages(2009-11) ➢ Supported SNEH- Special Need Education Home (2010) ➢ Sewing machines @ Chambal Sagar Colony (2012) ➢ Sewing machines @ Mehatwas (2012) ➢ 16 Solar Lights in adjoining area (Mehtwas) (2012) ➢ Sewing Machines @ Durgapura (2012) ➢ Public Library at Nagda (2012) ➢ Supported SNEH- Special Need Education Home (2012) ➢ Supported by drinking water coolers and purifiers (2013) ➢ College Bus to Nagda Municipal Council (2013) ➢ LANXESS supported Computer Lab (2014) ➢ Supported Dainik Bhaskar Sapling Plantation Drive (2015) ➢ Donated Digital X- Ray machine to Civil Hospital Nagda (2015) ➢ Donated Dialysis Machine to Civil Hospital Nagda (2016) ➢ Donated Sonography Machine to Civil Hospital Nagda (2017) ➢ Donated Digital SMART Classes to Government

		College Nagda (2017) ➢ Donation for overhead tank renovation, garden development and solar street lights in Mehetwas and Durgapura (2017) ➢ setting up a Culture & Recreation centre and a Digital Library in Nagda in addition to supporting Nagda Civil Hospital with another Dialysis machine. (2018) ➢ Setup of Intensive Care Unit (ICU) @ Civil Hospital Nagda (2019) ➢ Drinking water storage system for nearby villages Bikampur, Takaravada, Bhagatpuri, Mahetwas (2019) ➢ Girls Hostel : Renovation support (2019) ➢ Transportation for SNEH (School for special kids) (2019) ➢ Solar street light energy conservation (2019) ➢ Sanitizer Cabin - Covid-19 Support (2020) ➢ X-Ray Cassettes medical equipment @ Civil Hospital, Nagda (2020) ➢ Provision of drinking water Tank @ Umarna (2020) ➢ Fumigator and other Medical Equipment @ Civil Hospital Nagda (2021) ➢ ESIC Hospital Oxygen Line Civil Hospital Rogi Kalyan Samiti (2021) ➢ Providing Oxygen Concentrator to Hospitals, Ujjain (2021) ➢ Providing Ventilators to Hospital @ Ujjian Covid- 19 (2021) ➢ Arranging Covid-19 VACCINATION Camp, Nagda (2021) ➢ Christian Mission Hospital Support Covid-19 (2021) ➢ Rain Water Harvesting project in 02 villages (2021) ➢ Rain Water Harvesting Soil Survey 04 Villages (2021) **CER activities done by LANXESS India Private Limited** The LANXESS has joined hands in public health study of surrounding villages in collaboration with surrounding industries. The study was carried out by M/s. NIREH,

		Bhopal. ➢ Medical examination of people in nearby Villages(2021) The company will also undertake further relevant measures to improve the socioeconomic conditions and eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment of the surrounding area through CSR or CER.
11.1.6	The company shall earmarked 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 measure shall not be diverted for any other purpose.	Noted and shall be followed. We have earmarked the fund for environment management/ pollution control measure for the year 2021 and it shall not be diverted for any other purpose.
11.1.7	A copy of 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.	A communication letters have been already send to Panchayat, Zilla Parishad / Municipal Corporation and Urban local body.
11.1.8	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 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.	Interim compliance report has been submitted to SPCB and CPCB. Six monthly compliance report shall be submitted including results of monitored data to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB.
11.1.9	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 the compliances of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by e-mail.	The Environmental statement for each financial year ending 31st March in Form-V as is being submitted to the State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986.

11.1.10	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 data of issues of the clearance letter, at least in two local newspapers that are widely circulated in the region on 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.	An advertisement was published in local newspaper.
11.1.11	The project authorities shall inform the Regional Offices 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.	On completion of the project, the site will inform to the Regional Offices as well as the Ministry, the date of financial closure and final approval of the project.
11.1.12	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 od Law, if any, as may be applicable to this project.	Noted.
12	The Ministry serve the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said condition 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.	Noted.
13	Concealing factual data or submission of false /fabricated data and failure to comply with any of the condition mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection)Act, 1986.	Noted.
14	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.
15	The above conditions shall be enforced, Inter-alia under the provision 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	Noted.

	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.	
