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F.No. IA-J-11011/350/2018-IA-II(I)
Government of India
Ministry of Environment, Forest and Climate Change
(Impact Assessment Division)

Indira Paryavaran Bhawan
Jorbagh Road, New Delhi - 110003

Dated: 17th June, 2021

To,

M/s Lanxess India Pvt Ltd
Birlagram, Tehsil Nagda, District Ujjain
Madhya Pradesh – 456 331

Email: lanxessindia20@gmail.com

Sub: Expansion of Chemical Industry at Birlagram, Tehsil Nagda, District Ujjain, Madhya Pradesh by M/s Lanxess India Pvt Ltd - Environmental Clearance - reg.

Sir,

This has reference to your proposal No. IA/MP/IND2/83152/2018 dated 5th January, 2021 and further ADS reply on 18th April 2021 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 Chemical Industry by M/s Lanxess India Pvt Ltd at Plot No. 161/2, 162, 163/1, 164/1, 164/2, 165/2/2, 166/2, 167/4, 192/1, 196/2, 220, 221,222, 223, 224, 225, 227/1, 227/3, 256/2, 257, 258, 259/1/2, 259/2, 260/1, 261/3/1, 191/1, 191/2/1, 191/3/1, 191/3/2, 191/4, 192/3, 192/4, 192/5, 215/1, 227/4, 230/1, 230/3, 230/4, 230/5/2, 230/6, 230/7, 230/8, 230/9, 230/10, 232/2, 234/1, 244/1, Birlagram, Tehsil Nagda, District Ujjain, Madhya Pradesh.

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

S. No.	Product	Capacity (TPA)		
		Existing	Additional	Total
1	Benzyl Chloride	54750	25550	80300
2	Benzyl Alcohol	36000	0	36000
3	Benzyl Acetate	7200	7800	15000
4	Benzaldehyde	19000	13250	32250

5	Hydrochloric Acid	212400	76300	288700
6	Sulphur Di Chloride	12400	-11800	600
7	Sodium Benzoate	2500	-150	2350
8	Thionyl Chloride	50000	20000	70000
9	Di Benzyl Ether	3600	1400	5000
10	Cinnamaldehyde	3000	7000	10000
11	Benzyl Benzoate	3000	6000	9000
12	Benzyl Salicylate	3000	7000	10000
13	Cinnamyl Alcohol	3000	0	3000
14	Hexyl Cinnamaldehyde	3000	5000	8000
15	Fraction Finished Goods	9250	4250	13500
16	Industrial Salt	2675	9575	12250
17	Sodium HypoChlorite	---	250	250
18	Alpha amyl Cinnamaldehyde	---	2000	2000
19	Sulphuric Acid	---	6000	6000
Total		4,24,775	1,79,425	6,04,200

4. It is reported that the existing land area is 234680 sqm, which will cater to the proposed expansion. Industry will develop greenbelt in an area of 88,300 sqm covering 37.63% of total project area. The estimated project cost is Rs 390 crores. Total capital cost earmarked towards environmental pollution control measures is Rs. 55.0 crores and the recurring cost (operation and maintenance) will be about Rs. 5.5 crores per annum. The project will lead to employment for 1020 persons directly & indirect after expansion. Industry proposes to allocate Rs. 2.92 crores towards Corporate Environmental Responsibility.

5. It is reported that there are no National parks, Wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. within 10 km from the project site. Chambal river flows at a distance of 300 m in West direction from the boundary 7 of the project site.

6. It is noted that the total water requirement is estimated to be 5064 KLD, out of which 3048 KLD is proposed to be met by Domestic wastewater from local areas treated by in-house STP of 3500 KLD, 766 KLD is proposed to be met by steam Condensate water from external steam, 9 KLD of drinking water demand is met by external water suppliers and Recycled water from STP will be 1241 KLD.

Total 1241 KLD waste water quantity will be recycled after required treatment through ETP, Reverse Osmosis (RO) Separation and Multiple Vapor Reclaimer (MVR) Evaporator. The plant will be based on Zero Liquid discharge system.

Power requirement after expansion will be 10.3 MW including existing units and will be met from MP Paschim Kshetra Vidyut Vitaran Company and 1x3.95 MW

Co-generation plant. After proposed expansion, an additional Co-generation plant of 6 MW will serve as power source.

Existing unit has 4 DG sets of 1500 kVA, 1250 kVA, 1000 kVA and 500 kVA capacity and no additional DG sets are proposed in the expansion. Existing unit has 3.5 TPH captive liquid waste Incinerator with heat recovery boiler, 25 TPH AFBC Boiler (Standby) and 45 TPH of Coal and biomass fired Boiler. Additionally, 3.5 TPH of captive liquid waste Incinerator with heat recovery boiler and 70 TPH of Coal and biomass fired Boiler will be installed. Bag filter with a stack of height of 72 m will be installed for controlling the particulate emissions within the statutory limit of 115 mg/Nm³ for the proposed boilers and 32 m stack will be provided to proposed liquid waste incinerator. Process emission & management and Solid/Hazardous waste disposal are as per the detailed plan provided in the EIA/EMP report and as deliberated in the EAC.

7. The project/activities are covered under category A of 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. The terms of reference (ToR) has been issued by the Ministry vide letter dated 31st December, 2018. Public hearing for the project has been conducted by the Madhya Pradesh Pollution Control Board on 7th March, 2020, which was presided over by the Additional District Magistrate. The main issues raised during the public hearing are related to employment generation, air pollution control measures, latest techniques / devices to be deployed for control of Air and Water pollution, providing safe drinking water, high quality health care facilities to villagers, community development, help to nearby villagers in getting education and healthcare facilities. The project proponent has informed the details of litigation against the proposal and stated that at present there is no litigation pending against the project proponent.

9. The proposal was considered by the Expert Appraisal Committee (Industry-3) in its meetings held on 14-15 January, 2021, 22-23 February, 2021 and 18-19 May, 2021 in the Ministry through video conferencing, wherein the project proponent and their accredited consultant M/s Greencindia Consulting Pvt Ltd, presented the EIA/EMP report as per the ToR.

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

The Committee noted that the proposed site visit of the Sub-Committee could not be undertaken due to the on-going Covid pandemic situation and unavoidable circumstances and the proposal was placed before the EAC for deliberations. The Committee was also of the view that the site visit cannot be undertaken due to

existing pandemic situation and proposal deliberated based on the information submitted by the project proponent.

The EAC noted that the Project Proponent has given an 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 are 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 found the baseline data and incremental GLC due to the proposed project within the NAAQ standards. The Committee also deliberated on the activities/action plan and found to be addressing the issues in the study area and public hearing concerns. The Committee suggested that the storage of toxic/explosive raw materials shall be bare minimum in quantity and inventory. The Committee noted that at present there is no court order against the project proponent. The Committee also noted that there is no credible flood plan/river bed management plan for Chambal river, which is otherwise required. The Committee noted that the unit was in operation with the valid CTO from the State PCB. PP has submitted the certified compliance report of CTO/existing operation received from SPCB and the Committee found the same in order. The Committee noted that water requirement in the unit is to be met through the external waste water treated through STP and steam condensate water from external steam. The Committee found the additional information submitted by the project proponent to be satisfactory and addressing to the concerns of the Committee.

The EAC deliberated on the proposal with 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 found the proposal in order and recommended for grant of environmental clearance.

10. 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.

11. Based on the proposal submitted by the project proponent and recommendations of the EAC (Industry-3), Ministry of Environment, Forest and Climate change hereby accords **Environmental clearance to the project for Expansion of Chemical Industry by M/s Lanxess India Pvt Ltd 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:-

- (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). 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.
- (iii). 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.
- (iv). 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.
- (v). 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.
- (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). As proposed water requirement for industrial use shall be met from STP treated domestic wastewater from local areas and steam condensate water from external steam. Drinking water requirement shall be met through external fresh water suppliers.
- (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/adjacent areas. 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. Trees have to be planted with spacing of 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 trees must be planted within first year.

- (xv). 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.
- (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.

11.1 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, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
- (ii) 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) Rules, 1996, and Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and other rules notified under various Acts.
- (iii) The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
- (iv) 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 the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
- (v) The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken 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.

- (vi) 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.
- (vii) 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.
- (viii) 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.
- (ix) 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.
- (x) 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.
- (xi) 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.

(xii) 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.

12. 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.

13. 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.

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.

15. 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.

16. This issues with approval of the competent authority.

P. 17/06/2021
(Dr. R. B. Lal)

Scientist 'E'/Additional Director
Tele-fax: 011-24695362
Email-rb.lal@nic.in

(डा. आर. बी. लाल)
(Dr. R. B. LAL)
वैज्ञानिक 'ई'/Scientist 'E'
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
Min.of Environment, Forest and Climate Change
भारत सरकार, नई दिल्ली
Govt. of India, New Delhi

Copy to: -

1. The Deputy DGF (C), MoEF&CC Integrated Regional Office, E-5, Kendriya Paryavaran Bhawan, E-5 Arera Colony, Link Road-3, Ravishankar Nagar, Bhopal -462016
2. The Secretary, The Department of Housing and Environment, Government of Madhya Pradesh, E-5, Arera Colony, Bhopal, Madhya Pradesh 462016

3. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 32
4. The Member Secretary, Madhya Pradesh Pollution Control Board E-5, Arera Colony, Paryavaran Parisar, Bhopal - 462 016
5. The District Collector, District Ujjain, Madhya Pradesh
6. Guard File/Monitoring File/Website/Record File/Parivesh Portal

(Dr. R. B. Lal)
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