



Technical Plant : E-442, Riico Industrial Area
Chopanki (Bhiwadi) 301707 (Raj.)
Telefax : 01493 - 298189 - 91



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(INDIA) LIMITED

Date: 15-04-2019

To

SHRI V.K. SINGH, IFS

Addl. Principal Chief Conservator of Forests (C),
Ministry of Environment, Forest & Climate Change,
Regional Office (Central Region),
Kendriya Bhawan, 5th Floor,
Sector "H" Aliganj,
Lucknow – 226024

Sub: Six monthly compliance reports

Respected Sir,

Please find the six monthly compliance reports for the period 1st October 2018 to 31th March 2019. Please find the following documents in order:

1. Data sheet part-1 with address of project chief engineer
2. Compliance report of environmental clearance
 - a. J-11011/253/2005-IA II (I) dated 20-10-2005
 - b. J-11011/63/2009-IA II (I) dated 29-04-2009
3. Test Certificates

Thanking You,

Yours faithfully

Dr Mukesh Kumar

GM (R&D)

Insecticides (India) Limited,

Chopanki, Bhiwadi (Raj.)

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DATA SHEET PART - 1

S. No.		
1.	Project Type	Manufacturing
2.	Name of the project	Pesticide technical
3.	Clearance letter/OM No. & Date	a. J-11011/253/2005-IA II (I) dated 20-10-2005 b. J-11011/63/2009-IA II (I) dated 29.04.2009
4.	a) Districts b) States c) Latitude d) Longitude	Alwar Rajasthan 28°09'40" to 28°09'48" N 76°52'44" to 76°52'52" E
5.	Address for correspondence a) Address of concerned project Chief Engineer (with pin code & telephone/telex/fax numbers) b) Address of executive project engineer (with pin code & telephone/telex/fax numbers)	Mr. M. Koteswar Rao (DGM) E-442, RIICO Industrial Area, Chopanki, Bhiwadi (Raj.)301707 Telefax: 01493-298189-91 Mobile: +91-9116101175 Mr. Amar Pathak (Mgr. Maint.) E-442, RIICO Industrial Area, Chopanki, Bhiwadi (Raj.)301707 Telefax: 01493-298189-91 Mobile. No. +91-7737212078
6.	Salient features: a) Of the project b) Of the environmental management plans	Already submitted Already submitted
7.	Breakup of the project area a) Submergence area (forest & non-forest) b) Others	None 3958 M ²
8.	Breakup of the project affected population with enumeration of those losing houses/dwelling unit only units and agricultural land less laborers / artisans. a) SC/ST/Advisees b) Others c) Number of villages affected d) Name & other particulars of identified area for settlement e) Compensation package f) Budget g) Status	Project in RIICO Industrial Area Not applicable Not applicable Not applicable Not applicable Not applicable Not applicable Not applicable

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9.	<p>Financial details</p> <p>a) Project cost as originally planned subsequent revised estimates and the years of price reference</p> <p>b) Allocations made for environment management plans, with item wise and year wise break up</p> <p>c) Benefit cost ratio/internal rate of return and the year of assessment</p> <p>d) Whether © includes the cost of environment management as shown in above</p> <p>e) Actual expenditure incurred on the project so far</p> <p>f) Actual expenditure incurred on environment management plans so far</p>	<p>Rs. 1606.34 Lacs revised on 22/01/2019</p> <p>130 Lacs</p> <p>Not applicable</p> <p>Yes</p> <p>Rs. 1606.34 Lacs</p> <p>Rs. 130 Lacs</p>
10.	<p>Forest land requirement</p> <p>a) The status of approval for a diversion of forest land for non-forest use</p> <p>b) The status of compensatory a forestation</p> <p>c) The status of clear felling</p> <p>d) Comments on the viability & sustainability of compensatory A forestation programmed in the light of actual field experience so far</p>	Not applicable
11.	The status of clear felling in non-forest area	Not applicable
12.	<p>Status of construction</p> <p>a) Date of commencement (actual)</p> <p>b) Date of completion (actual)</p>	Not applicable
13.	Reasons for the delay if the project is yet to start	Not applicable
14.	<p>Date of site visit</p> <p>a) Dates on which project was monitored by the regional office previous occasions, if any</p> <p>b) Date of visit for this monitoring report</p>	<p>10-01-2019</p> <p>14-03-2019</p>

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SIX MONTHLY COMPLIANCE REPORT

Name of the Project : Pesticide manufacturing unit
Project code : Raj-44/372/2005
Raj-107/740/2009
Clearance Letter No : J-11011/253/2005-IA II (I) dated 20th Oct 2005
J-11011/63/2009-IA II (I) dated 29th April 2009
Period of Compliance Report : 01-10-2018 to 31-03-2019

S. No.	Conditions	Compliance Status
Specific conditions		
1.	The process effluent shall not exceed 9.0 m ³ /d of which 8.4 m ³ /d of effluent shall be treated in the ETP and treated effluent after conforming to the prescribed standards shall be used for green belt development. Bio-assay test shall be carried in the holding pond for the treated effluent before using the effluent for green belt. About 0.6 m ³ /d of effluent shall be incinerated in the incinerator.	We are having well designed ETP to treat the effluent. The treated effluents are used for green belt development. Bio-assay test is carried out. Process effluent is incinerated.
2.	The gaseous emissions (SO ₂ , NO _x , VOC and HC) along with SPM and RSPM from various process units shall conform to the standard 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 systems adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.	The air monitoring is done on five different places and the results are is below during December 2018: RSPM 36.97 – 48.39 µg/m ³ SPM 75.54 – 90.36 µg/m ³ NO ₂ 24.00 – 27.44 µg/m ³ SO ₂ 12.12 – 13.55 µg/m ³ CO BDL (DL-0.85 mg/m ³) VOC Not detectable At no time, the emission level is beyond the stipulated standards.
3.	The proponent shall upload the status of compliance of the stipulated environmental clearance conditions, including results of 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 State Pollution Control Board. The criteria pollutant	The monitoring data are being sent to MOEF, Lucknow and Zonal office of CPCB, Bhopal on six monthly basis; the State Pollution Control Board, Jaipur and Regional Office of CPCB, Bhiwadi on monthly basis. Critical sectoral parameters,

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	levels namely; SPM, RSPM, SO2, NOx (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	indicated for the project are being monitored and displayed at a convenient location near the main gate of the company
4.	The process emissions from the reactors and incinerator shall be scrubbed with scrubbers. The spent scrubber solution shall be treated in the ETP. The particulate emissions from the boiler shall be controlled by bag filter and shall be dispersed through stack of adequate height as per CPCB standards.	<ul style="list-style-type: none"> • The process emissions are treated through scrubber. • The SMP of boiler are controlled by cyclone system. • The stack height of boiler is 30 meter. • SPM = 269.80 mg /Nm³
5.	The gaseous emissions from the DG sets shall be dispersed through stack height as per CPCB standards. Acoustic enclosures shall be provided to mitigate the noise pollution.	<ul style="list-style-type: none"> • Stack height is as per CPCB standards. • Acoustic enclosure is provided to mitigate the noise pollution.
6.	Standards notified for pesticides unit under the Environment (Protection) Act, 1986 and amended time to time shall be followed by the unit.	Standards are being followed by the unit.
7.	The company shall obtain authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management Handling and Trans-Boundary Movement) Rules, 2008 for management of Hazardous wastes. Measures shall be taken for firefighting facilities in case of emergency.	<ul style="list-style-type: none"> • Number of authorization is RPCB/HWM/2016-2017/HSW/HSW/329. • Valid for period from 01/12/2016 to 30/11/2021 • Fire fighting facilities are provided in case of emergency.
8.	Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by RPCB.	Being monitored. VOC not detectable
9.	All the storage tanks shall be under negative pressure to avoid any leakages, breathers, N2 blanketing and condensers will be provided for all the storage tanks. Closed handling systems for chemicals and solvents will be provided. Magnetic seals will be provided for pumps/agitators for reactors for reduction of	<ul style="list-style-type: none"> • Closed handling system for chemicals and solvent is provided. • Chilled Brine based condensers are used to prevent VOC emissions. • Solvent traps are installed

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	fugitive emissions. Chilled Brine based condensers shall be used to prevent VOC emissions. Solvent traps shall be installed wherever necessary.	wherever necessary
10.	All venting equipment shall have vapour recovery system. All the pumps and other equipment's where there is a likelihood of HC leakages shall be provided with leak detection and repair (LDAR) system and LEL indicators and Hydrocarbon detectors. Provision for immediate isolation of such equipment, in case of a leakage will also be made. The company shall provide a well defined leak detection and Repair (LDAR) programme for quantification and control of fugitive emissions. The detectors sensitivity will be in ppm levels.	All venting equipment is having vapour recovery system. All the pumps and vessels are provided with mechanical seal to prevent leakage
11.	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.	Drains are constructed to control spillage in case of accident.
12.	The company shall make adequate arrangement for control of odour nuisance from the plant premises.	The control of odour nuisance from the plant premises, all the equipments are connected with venting system.
13.	The adequate financial provisions shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be diverted for any other purposes.	The total funds 130 lacs are adequate for environmental safeguards and no fund is diverted for any other purposes.
14.	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the factories Act.	Occupational health surveillance of the workers is done regularly by registered Doctor and records are maintained.
15.	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.	Fire hydrant with 1 lac liter water storage capacity is provided.
16.	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	Training and safety programs are arranged for all workers and employees.

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	imparted.	
17.	Usage of PPEs by all employees/workers shall be ensured.	Usage of PPEs by all employees and workers is compulsory and ensured.
18.	The company shall strictly follow all the recommendations mentioned in the Charter on Corporate Responsibility for Environmental Protection (CREP)	The company is strictly following CREP
19.	The company shall adopt waste minimization/cleaner production techniques to reduce the pollution load and action plan in this regard submitted to the Ministry.	The company is producing lambda cyhalothrin technical, where very less water is used
20.	The company shall undertake rainwater harvesting measures to recharge the ground water as well as reduced consumption of water.	Rainwater harvesting system is working well. We have constructed rain water harvesting dams out of the premises in Tijara district.
General conditions		
1.	The project authorities shall strictly adhere to the stipulations of the SPCB/state government or any statutory body	We are strictly following the terms & conditions as per consent to operate.
2.	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forest. 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.	No expansion and modification is done
3.	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.	Number of authorization is RPCB/HWM/2016-2017/HSW/HSW/329 , valid for period from 01/12/2016 to 30/11/2021
4.	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	Five ambient air quality monitoring stations are set up in the downwind and the results are as below during March 2019

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	Pollution Control Board.	RSPM 34.60 – 44.82 µg/m ³ SPM 76.00 – 85.61 µg/m ³ NO ₂ 25.91 – 28.00 µg/m ³ SO ₂ 12.76 – 14.20 µg/m ³ CO BDL (DL 0.78 – 0.92 mg/m ³)
5.	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.	Stack height is 30 meter The scrubbed water is sent to ETP for further treatment
6.	The company shall undertake following Waste Minimization measures: - <ul style="list-style-type: none"> • Metering of quantities of active ingredients to minimize waste. • Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. • Maximizing recoveries • Use of automated material transfer system to minimize spillage • Use of “Closed Feed” system into batch reactors. 	The company is undertaking following Waste Minimization measures: - <ul style="list-style-type: none"> • Active ingredients quantity is measured in each batch. • Vent condenser is used for solvent recovery • There is no spillage during transfer • Closed feed system is being used.
7.	The overall noise levels in and around the plant area shall be kept well within the standard (85 dBA) by providing noise control measures including acoustic hood, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standard prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time)	Acoustic silencers, enclosures are used to control the noise level. Results below during March 2019 Day time 72.84 dBA Night time 62.92 dBA
8.	A separate Environmental Management Cell equipped with full fledged laboratory, facilities shall be set up to carry out the environmental management and monitoring functions.	The environmental management and monitoring functions are proper.
9.	The project authorities shall develop greenbelt in 33% of project area as per the guidelines CPCB to mitigate the effect of fugitive emission.	Greenbelt is developed in 33% area
10.	The implementation of the project vis-à-vis environmental action plans shall be monitored by Ministry's Regional Office at	The Regional Office Lucknow is monitoring the project time-to-time

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	Lucknow/SPCB/CPCB. A six monthly compliance status report shall be submitted to monitoring agencies.	
11.	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 Officer.	The public was informed through RAJASTAN PATRIKA dated 12.09.2009 and THE TIMES OF INDIA dated 13.05.2009 above the project.
12.	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.	The financial closing is 31 st March of every year.

Further, we understand that the ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.

Thanking You,

Yours faithfully

Dr Mukesh Kumar
General Manager
Insecticides (India) Limited,
Chopanki, Bhiwadi (Raj.)

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