

Minutes of 3rd meeting of Technical Committee (2024-25) for assessment of application of under change in product-mix

Date : 16/08/2024

Venue : 4th Floor, Conference Hall, Kalpataru Point, Sion, Mumbai & Microsoft Team Video conferencing.

Technical Committee Members present for the meeting:

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|---|-----------------|
| 1) Shri. Nandkumar Gurav, Assistant Secretary (Technical), MPCB | Chairman |
| 2) Shri. A.M. Pimparkar, Scientist-1, Environment Department | Member |
| 3) Shri. Partik Bharne, I/c Regional Director, CPCB | Member |
| 4) Shri. Dr. V. M. Motghare, Joint Director (APC) | Member |
| 5) Shri. S.L Waghmare, I/c Joint Director (WPC) | Member |
| 6) Dr. B.R. Naidu, Ex. Regional Director, CPCB | Member |
| 7) Shri. Dr. Ravindar Kontham, Principal Scientist, NCL Pune | Member |
| 8) Shir. S.L Waghmare, Regional Officer (BMW), MPCB | Member Convener |

At the outset, the request was received from the members (1) Shri. M.P. Patil, Representative of NEERI (2) Shri. S.V. Patil, Vasantdada Sugar Institute (3) Shri. Anurag Garg, Chair Professor, IIT Bombay for leave of absence from attending the meeting was placed before the Committee meeting. The Committee considered the same.

Shri. Nandkumar Gurav, Assistant Secretary (Technical), MPCB & Chairman of the Committee welcomed all the Committee members. The committee deliberated on the agenda items placed and following decision were taken.

Agenda item No	No. 1
Proposal No.	MPCB-CONSENT-0000201920
Project Details	M/s. Balaji Formalin Pvt. Ltd., Plot No. N-32/1, Additional Patalganga MIDC, Tal. Panvel, Dist. Raigad.
NIPL Certificate	NIPL certificate issued by M/s SAGE (Sustainable Approach for Green Environment) LLP, No. Nill, Date: 06.08.2024

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000201920 along with the copies of documents seeking the 1st time amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing Synthetic Organic Products and allied products.

Existing Clearances: -

1. Environmental Clearance is accorded to the industry by MoEF and CC vide No SEAC-2015/CR-346/TC-2 dated 26.08.2016 for the total production capacity of 2,54,018 TPA.
2. The Consent to Operate was accorded by the Board vide No: Format 1.0 / CC / UAN No. 0000125219 /CR / 2205000711, dated 12.05.2022 valid up to 28.02.2025.

Project details: -

A. Production Details: -

Sr. No	Product Name	As per EC, TPA	Existing As per CTO, TPA	Addition(+)/ Deletion (-), TPA	After proposed change in product mix, TPA
1	Aqueous Formaldehyde (37%-55% Concentration) -(AF)	1,50,000	1,50,000	0	1,50,000
2	Hexamine	6000	6000	-5000	1000
3	Paraformaldehyde (91-96%) - (PFD)	20,000	20,000	+10,000	30,000

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4	Urea Formaldehyde (UF) & Melamine Formaldehyde (MF) (Liquid Resin) [AND/OR]	15,000	15,000	-10,000	5000
	Urea Formaldehyde (UF) & Melamine Formaldehyde (MF) (Powder Resin)	7,500	7,500	-5,000	2,500
5	Phenol Formaldehyde (PF) (Liquid) [AND/OR]	5,000	5,000	-4,000	1000
	Phenol Formaldehyde (PF) (Powder)	2,500	2,500	-2,000	500
6	Silver Refining (Refined Silver Catalyst)	18	18	0	18
7	Urea Formaldehyde Concentrate (UFC)	20,000	20,000	+45,000	65,000
8	Sulphonated Napthalene Formaldehyde (SNF) (Liquid) [AND/OR]	20,000	20,000	-19,000	1000
	Sulphonated Napthalene Formaldehyde (SNF) (Powder)	7,000	7,000	-6,650	350
9	Methylal (99.5%)	18,000	18,000	-17,000	1000
	Total	2,54,018	2,54,018	0	2,54,018

- Industry has proposed change in product mix by increasing production quantity of two products and by decreasing production quantity of five products and No Change in two Existing Products.
- Industry has proposed that the total production will remain same i.e. 2,54,018 TPA, keeping the pollution load within the consent limit.

B. Pollution load Details: -

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix: -

Particular	As Per EC, CMD	Existing as Per CTO, CMD	After change in product mix, CMD
Process + APCM	433	424	216
Boiler + Cooling	216	216	424
Total Trade	649	640	640
Domestic	8	17	17
Grand Total	657	657	657




- After a change in product mix the Total process water consumption is proposed to be same as 657 CMD after a change in product mix.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Particular	As per EC, CMD	Existing as per CTO, CMD	After change in product mix, CMD
Process + APCM	-	-	-
Boiler	-	-	-
RO Reject + Cooling	132	132	132
Total Industrial	132	132	132
Domestic	7	15	15
Grand Total	139	147	147

- After a change in product mix Industry has proposed a same quantity of the trade effluent, however the domestic effluent is increasing with reference to EC but equal to consent to operate.

iii) COD, BOD and TSS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic: -		
From Process and Utilities blowdown		
Flow (CMD)	132	
Parameter	Kg/Day	mg/L
COD	25.28	191.52
BOD	5.20	39.4
TSS	3.96	30
After Product Mix Effluent characteristic:-		
From Process and Utilities blowdown		
Flow (CMD)	132	
Parameter	Kg/Day	mg/L
COD	25.28	191.52
BOD	5.20	39.4
TSS	3.96	30

- Average COD, BOD and TSS load after change in product mix is proposed to be same.

C) Treatment System: -

- i) **Trade Effluent:** - Total trade effluent amounting to 132 CMD generated from process and utilities are being treated in effluent treatment plant consisting of RO-MEE to achieve ZLD.
- ii) **Sewage effluent:** - Domestic wastewater is sent to STP and treated sewage is taken for gardening.

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

Sr. No.	Stack No.	Stack Attached to	As per EC	Existing as per CTO	Fuel Consumption after Change in Product Mix	APC system	Stack Height, (m)
1	S-1	DG Set 1 (2x1000 KVA)	Diesel	Diesel	No Change	Stack	9
2	S-2	Boiler	F.O.	Not Mentioned	Heat Recovery, No Change	Stack	-

- Industry is not using FO as fuel in boiler and industry is operating boiler using heat recovery from the process. The Boiler is not mentioned in consent to operate.

ii) Process emissions and control systems: -

Sr. No.	Stack attached to	APC system	Stack Height, m
1	Formaldehyde Plant Process Vent	Catalytic Converter	11
2	Paraformaldehyde Plant Process	Scrubber	11

- Industry has submitted there are no changes in the process emissions.

E) Hazardous Waste Aspect: -

Sr. No	Type of Waste	Cat. No.	As per EC, TPA	Existing as per CTO	After Change in Product Mix Qty.	Disposal
1.	Used or spent oil	5.1	-	100 Lit/ day	100 Lit /day	Sale to authorized party / CHWTSDF
2.	Wastes or residues containing oil	5.2	-	0.5 MT/A	0.5 MT/A	CHWTSDF
3.	Spent catalysts	29.5	-	10 KL/A	10 KL/A	Sale to authorized party / CHWTSDF
4.	ETP Sludge	29.5	-	300 MT/A	300 MT/A	CHWTSDF
5.	Calcium Sulphate	28.1	-	8900 MT/A	2 MT/A	Sale to authorized party / CHWTSDF
6.	MEE Residue	37.3	-	10 MT/A	10 MT/A	CHWTSDF

- After a change in product mix the total hazardous waste is propose to remain same except Calcium Sulphate.
- The hazardous waste Calcium Sulphate (28.1) is decreasing from 8900 MT/A to 2 MT/A.
- The total hazardous waste is proposed to reduce by 8898 MT/A.

Technical Committee Deliberation: -

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. SAGE (Sustainable Approach for Green Environment) LLP, No.- Nil, Date. - 06.08.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:-

- 1) Industry has proposed 1st time Change in product mix.
- 2) Industry has proposed change in product mix by increasing production quantity of two products and by decreasing production quantity of five products and No Change in two Existing Products.

- 3) Industry has proposed that the total production will remain same i.e. 2,54,018 TPA, keeping the pollution load within the consent limit.
- 4) After a change in product mix the Total process water consumption is proposed to be remain same.
- 5) After a change in product mix, Industry has proposed no change in the quantity of trade effluent.
- 6) The average COD, BOD and TSS load after change in product mix is proposed to be remaining same.
- 7) Industry has submitted there are no changes in the process emissions.
- 8) Industry has proposed a boiler which is being operated by Heat Recovery, but the same is not reflected in the consent to operate.
- 9) Industry has proposed that there is no emission of Acid Mist and there is no change in emission of TPM and SO₂.
- 10) The hazardous waste Calcium Sulphate (28.1) is decreasing from 8900 MT/A to 2 MT/A.
- 11) After a change in product mix the total hazardous waste is propose to reduce by 8898 TPA.

Technical Committee Decision: -

Technical Committee decided to defer the application and industry shall resubmit the details of Heat Recovery Boiler with stack height and emissions if any and comparison of the pollution load with respect to Air Pollution Aspect as per the Environmental Clearance and consent to operate.



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Agenda item No	Agenda No. 2
Proposal No.	MPCB-CONSENT-0000200484
Project Details	M/s. Cipla Ltd., (Unit-III) Plot No. D-22, Kurkumbh MIDC, Tal. Daund, Dist.: Pune,
NIPL Certificate	NIPL certificate issued by M/s. Equinox Environments (I) Pvt Ltd., vide letter No.: EEIPL/8/2024.25, Date: 12/08/2024.

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000200484 along with the copies of documents seeking 3rd time amendment in consent to operate for proposed change in product-mix under the provisions of EIA Notification 2006 amended on 23 Nov-2016 & 02.03.2021. This is an existing unit engaged in manufacturing API /Drug and Intermediates.

Exiting Clearances: -

1. Environmental clearance was accorded by Environment Department GoM, vide No. J-11011/47/2005-IA II (I) dated 13.10.2005, for expansion of bulk drug unit from 62.52 M/A to 150 MT/A.
2. The previous consent to operate was accorded under change in product mix vide No: - Format 1.0/ CAC/ UAN No.0000159754/CO/2309002291 dated 28.09.2023 Valid up to 30.04.2024.

Project details: -

A. Production Details: -

No.	Product	Existing Capacity as per CTO (MT/A)	After proposed NIPL Capacity (MT/A)	Remark
1.	Anti-Retroviral/anti-Viral : Abacavir Sulphate	9	20	Increased by 11 MT/A
2.	Anti-Retroviral/anti-Viral : Tenofovir Disoproxil Fumarate	8	8	No change
3.	Anti-Retroviral/anti-Viral : Tenofovir Alafenamide Fumarate	0.2	0.2	No change
4.	Anti-Bacterial/Fungal :Terbinafine Hydrochloride	22	15	Decreased by 7 MT/A
5.	Chelating Agent: Deferasirox	1.7	1.7	No change
6.	Anti-Neoplastic: Ondansetron Base / HCL	2	2	No change

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7.	R&D	0.5	2	Increased by 1.5 MT/A
8.	Anti-Retroviral/Anti-Viral: Dolutegravir Sodium	23.5	25	Increased by 1.5 MT/A
9.	Anti-Retroviral/Anti-Viral: Lamivudine	10	5	Decreased by 5 MT/A
10.	Nirmatrelvir	4	1	Decreased by 3 MT/A
11.	Anti-inflammatory: Tafamidis	0.1	0.1	No Change
12.	Omeprazole Sodium	10	5	Decreased by 5 MT/A
13.	Anti-Retroviral/Anti-Viral: Emtricitabine	8.8	8.8	No Change
14.	Anti-Retroviral/Anti-Viral: Remdesivir	0.5	0.5	No Change
15.	Anti-Retroviral/Anti-Viral: Oseltamivir Phosphate	20	20	No Change
16.	Anti-Retroviral/Anti-Viral: Valacyclovir Hydrochloride	0.2	0.2	No Change
17.	Anti-Retroviral/Anti-Viral: Molnupiravir	1	0.3	Decreased by 0.7 MT/A
18.	Anti-Retroviral/Anti-Viral: Cabotegravir Sodium	5	5	No Change
19.	Tenofovir Pivafen Fumarate	0.5	0.5	No Change
20.	Chelating Agent: Edaravone	0.1	0.1	No Change
21.	Anti-Androgen: Danazol	0.05	0.05	No Change
22.	Anti-Androgen: Cyproterone Acetate	0.7	0.7	No Change
23.	Anti-inflammatory: Eluxadoline	0.1	0.1	No Change
24.	Anti inflammatory / Histamine: Fexofenadine Hydrochloride	0.1	0.1	No Change
25.	Chelating Agent: Sodium thiosulfate pentahydrate	0.5	0.5	No Change
26.	Chelating Agent: Deferiprone	0.1	0.1	No Change
27.	Anti-Depressant: Escitalopram Oxalate	0.1	0.1	No Change
28.	Anti-Depressant: Citalopram Hydrobromide	0.1	0.1	No Change
29.	Anti-Neoplastic: Exemestane	0.5	1.5	Increase by 1 MT/A
30.	Anti-Dibetic: Dapagliflozin	0.05	0.05	No Change
31.	Anti-Dibetic: Empagliflozin	0.05	0.05	No Change
32.	Estrogenic: Levonorgestrel	0.01	0.01	No Change
33.	Bronchodilator: Formoterol Fumarate / FC-V	0.5	0.5	No Change

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34.	Anti-Parkinson: Pramipexole Dihydrochloride / PX-IV	0.25	0.25	No Change
35.	Cardiac: Trimetazidine Dihydrochloride	1	1	No Change
36.	Pantoprazole Sodium	10	9	Decreased by 1 MT/A
37.	Apixaban	0.3	2	Increased by 1.7 MT/A
38.	Ivacaftor	0.1	0.1	No Change
39.	Leflunomide	5	3	Decreased by 2 MT/A
40.	Isavuconazonium Sulphate	0.2	0.5	Increased by 0.3 MT/A
41.	Lenacapavir	0.5	0.5	No change
42.	Levermeloxifene Fumarate	0.5	0.5	No change
43.	Edoxaban Tosylate	0.1	0.1	No change
44.	Anti-Retroviral/Anti-Viral: Nevirapine/ Nevirapine hemihydrate	2	2	No change
45.	Lansoprazole	0	3	New Product
46.	Linagliptin	0	2	New Product
47.	Nintedanib	0	1.5	New Product
	Total	149.91	149.71	Total Production capacity reduction by 0.2 MT/A

- Industry has proposed a change in the product mix by reduction in production quantity of 7 Nos. of products, increase in production quantity of 6 Nos. of products and addition of 3 Nos. of new products. The proposed new products are in the same category of Bulk Drugs.
- The total production quantity after change in product mix is propose to reduce by 0.2 MT/A.

B. Pollution load Details: -

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix: -

No.	Purpose for water consumed	Water consumption (CMD)			Remark
		As per EC	As per CTO	After NIPL	
1	Industrial Cooling, spraying in mine pits or boiler feed	230	60	60	No Change
2	Domestic purpose		40	40	No Change
3	Processing whereby water gets polluted & pollutants are easily biodegradable		97.80	96	Reduced by 1.8 CMD

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4	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic		0.00	0.00	--
5	Gardening		30	30	No Change
	Total	230	227.8	226	Total Reduction by 1.8 CMD as against CTO

- After a change in product mix industry has proposed reduction in process water consumption by 1.8 CMD.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

No.	Description	Effluent Generation (CMD)			Remark
		As per EC	As per CTO	After NIPL	
1	Trade effluent	150	108.76	102	Reduced by 6.76 CMD
2	Domestic effluent		38	38	
	Total	150	146.76	140	Total reduction by 6.76 CMD as against CTO

- After a change in product mix industry has proposed a reduction in Process effluent generation by 6.76 CMD.

iii) COD and TDS Pollution load existing and after proposed change in product mix: -

No.	Details	COD (mg/lit)	TDS (mg/lit)	Existing		
				Effluent (CMD)	COD (Kg/D)	TDS (Kg/D)
1	Stream -I (Low COD & Low TDS)	6,000-7,000 =Avg. 6500	1000-3000 =Avg. 2000	94	611	188
2	Stream -II (High COD & High TDS)	1,00,000- 2,00,000 =Avg. 1,50,000	20,000- 25,000= Avg. 22,500	15	2250	337.5
	Total	--	--	109	2861	525.5
				After Change in Product Mix		
1	Stream -I (Low COD & Low TDS)	6,000-7,000 =Avg. 6500	1000-3000 =Avg. 2000	89	578.5	178




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2	Stream –II (High COD & High TDS)	1,00,000- 2,00,000 =Avg. 1,50,000	20,000- 25,000= Avg.22,500	13	1950	292.5
	Total	--	--	102	2528.5	470.5

- Average COD and TDS load after change in product mix is proposed to reduce by 332.5 Kg/Day and 55 Kg/Day respectively.

C) Treatment System: -

Trade Effluent: - total trade effluent of 102 CMD is segregated in two streams - Stream - I : (Low TDS & Low COD) : 89 CMD and (High TDS & High COD) : 13 CMD.

- Strong COD/TDS stream of 13 CMD** - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank,) followed by Stripper, MEE and ATFD.
- Weak COD/TDS stream of 89 CMD** - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Secondary (Activated sludge process), Tertiary (Pressure sand filter, activated carbon filter) followed by Ultra Filtration and Reverse Osmosis. RO Reject shall be sent to MEE.
- Sewage effluent:** STP of capacity 40 CMD is provided for treatment of domestic sewage.

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

No	Stack attached to	Fuel	Fuel Consumption	Stack Height in meter	APC System
1	Thermopack –2 Lack Kcal/Hr (2 Nos.- one is standby)	HSD	48 Kg/Hr	30	Stack
2	Boiler- 2 TPH (2 Nos.- one is standby)	LSHS/ PNG/ LDO/ HSD	LSHS 3.184 KL/D or PNG 162.68 SCM/Hr or LDO 3.8 KL/D or HSD 3.44 KL/D	33	Stack

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3	DG Set – 250 KVA	HSD	50 Kg/Hr.	4 (Above roof level)	Acoustic Enclosure/Stack
4	DG Set – 500 KVA	HSD	100 Kg/Hr.	5(Above roof level)	Acoustic Enclosure/Stack
5	DG Set - 750 KVA	HSD	150 Kg/Hr.	6 (Above roof level)	Acoustic Enclosure + RECD/Stack

- Industry has not proposed any change in existing utilities and fuel quantities.

ii) Process Emissions and control Systems: -

No.	Scrubber Attached	Process Emissions	Height of Scrubber (in Mt)	Scrubbing Media
1	Process Vent-1 (BD I)	HCl, Nox	3 (ARL)	Water/NAOH
2	Process Vent-2 (BD I)	HCl, Nox	6 (ARL)	Water/NAOH
3	Process Vent-3 (BD-II)	HCl, Nox	6 (ARL)	Water/NAOH
4	Process Vent-4 (BD-II)	HCl	4 (ARL)	Water/NAOH
5	Process Vent-5 (BD-III)	HCl, Nox	6(ARL)	Water/NAOH
6	Process Vent-6(BD-IV)	HCl, Nox	4 (ARL)	Water/NAOH
7	Process Vent-7(BD-IV)	Acid Mist & NOx	9 (ARL)	Water/NAOH

- The process emission control system i.e. scrubbers are installed.
- There is no additional process emissions and scrubber requirement after the proposed change in product mix.

E) Hazardous Waste Aspect: -

No.	Type of Waste	Category (As per Schedule)	Quantity		Mode of Treatment & Disposal
			Existing	After NIPL	
1.	Sludge from wet scrubbers	37.1	0.1 MT/A	0.1 MT/A	CHWTSDF
2.	Chemical sludge from waste water treatment	35.3	505.2 MT/A	505.2 MT/A	CHWTSDF
3.	Spent organic solvents	28.6	259.2 MT/A	259.2 MT/A	Sale to authorized party / CHWTSDF




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4.	Concentration or evaporation residue	37.3	284.11 MT/A	284.11 MT/A	CHWTSDF
5.	Date-expired products	28.5	0.21 MT/A	0.21 MT/A	CHWTSDF
6.	Oil and grease skimming	35.4	63 MT/A	63 MT/A	Sale to authorized party / CHWTSDF
7.	Spent carbon	28.3	10.6 MT/A	10.6 MT/A	CHWTSDF
8.	Spent solvents	20.2	3651.4 KL/A	3651.4 KL/A	Sale to authorized party / CHWTSDF
9.	Empty barrels/containers /liners contaminated with hazardous chemicals /wastes	33.1	1200 Nos./yr	1200 Nos./yr	Sale to authorized party
10.	Used or spent Oil	5.1	2.020 KL/A	2.020 KL/A	Sale to authorized party / CHWTSDF
11.	Spent catalyst	28.2	90 MT/A	90 MT/A	Sale to authorized party / CHWTSDF

- After the proposed change in product mix the industry has not proposed any change in Hazardous Waste Categories and quantities. The total Hazardous Waste quantities will remain same as per the existing consent to operate.

Technical Committee Deliberation:

The project proposal was discussed based on presentation made and documents- NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. Equinox Environments (I) Pvt Ltd., vide letter No.: EEIPL/8/2024.25, Date: 12.08.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that: -

- 1) The industry is existing and engaged in manufacturing of API/Bulk Drugs and Intermediates in batch process.
- 2) Industry has proposed 3rd time amendment in consent to operate under change in the product mix by reduction in production quantity of 7 Nos. of products, increase in production quantity of 6 Nos. of products and addition of 3 Nos. of new products. The proposed new products are in the same category of Bulk Drugs.
- 3) The total production quantity after change in product mix is propose to reduce by 0.2 MT/A.
- 4) After a change in product mix industry has proposed reduction in process water consumption by 1.8 CMD.
- 5) After a change in product mix industry has proposed a reduction in Process effluent generation by 6.76 CMD.
- 6) Average COD and TDS load after change in product mix is proposed to reduce by 332.5 Kg/Day and 55 Kg/Day respectively.

- 7) Industry has segregated the strong and weak stream effluent and provided separate treatment for the same and industry is recycling the entire treated effluent to achieve Zero Liquid Discharge.
- 8) Industry has not proposed any change in existing utilities and fuel quantities.
- 9) The process emission control system i.e. scrubbers are installed.
- 10) There is no additional process emissions and scrubber requirement after the proposed change in product mix.
- 11) After the proposed change in product mix the industry has not proposed any change in Hazardous Waste Categories and quantities. The total Hazardous Waste quantities will remain same as per the existing consent to operate.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
- 2) Industry shall ensure connectivity of OCEMS data to Board server.
- 3) Industry shall cover the collection and equalization tanks of Effluent Treatment Plant and shall provide scrubber to control the emissions.
- 4) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."



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Agenda item No	Agenda No. 3
Proposal No.	MPCB-CONSENT-0000207412
Project Details	M/s. Precise Biopharma Pvt. Ltd., (formerly known as Precise Chemipharma Pvt. Ltd.) Plot No. D-90/3, MIDC TTC, Turbhe, Navi Mumbai, Dist. – Thane.
NIPL Certificate	NIPL certificate issued by M/s. Element Consultancy Services, No.- Nil, Date. - Nil.

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000207412 along with the copies of documents seeking amendment in the consent to operate for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing API /Drug and Intermediates.

Exiting Clearances: -

1. Environmental clearance was accorded by Environment Department GoM, vide No. SEAC 2011 / CR-164 / TC2 Date. 26.12.2012 for manufacturing of APIs (7 Products) with a total production capacity of 25.2 TPA.
2. The Amendment in Consent to Establish for the products as per the EC was accorded by the Board vide No. Format 1.0/AST/RO-NM/EIC No. NM- 5995-15/E/Amend/ CC- 16221, Date. 31.12.2015.
3. The consent to operate (Part) for 3 Nos. of products only was accorded to vide No: - Format1.0/AS(T)/UAN No. MPCB-CONSENT-0000122625/CR/2202000727, Date: 11.02.2022 valid upto 30.09.2026.

Project details: -

A. Production Details: -

Sr. No	List of products/ proposed	Product/ Quantity as per EC in MT/A	Product/ Quantity as per (Part) CTO in MT/A	Product/ Quantity proposed after NIPL in MT/A	Remark
1.	Zolpidem Tartrate	3	3	3	No Change
2.	Clonazepam	0.6	-	0.0	Discontinued
3.	Lorazepam	0.6	-	0.0	Discontinued
4.	Illaprazole	3	-	0.0	Discontinued
5.	Febuxostat	6	6	0.0	Discontinued

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6.	Levocloperastine Fendizoate	6	6	6.0	No Change
7.	Zaltoprofen	6	-	0.0	Discontinued
8.	Cloperastine hydrochloride	-	-	3.15	New Product
9.	Dorzolamide HCl	-	-	1.2	New Product
10.	Levodropropizine	-	-	5.85	New Product
11.	Midazolam	-	-	0.5	New Product
12.	Naphazoline	-	-	1.0	New Product
13.	Olapatadine HCl	-	-	0.5	New Product
14.	Teneligliptin hydrochloride hydrate	-	-	3	New Product
15.	Timolol Maleate	-	-	0.5	New Product
16.	Zopiclone	-	-	0.5	New Product
	Total	25.2	15	25.2	--

- Industry has obtained Environmental Clearance for 7 Nos. of API /Intermediates products for total production quantity 25.2 MT/A. Industry has obtained Consent to Operate (Part) for 3 Nos. of products for total production quantity 15 MT/A.
- Industry has proposed a change in the product mix in comparison with Environmental Clearance by deletion of 5 Nos. of products, no change in capacity of 2 Nos. of existing products and addition of 9 Nos. of new products in the same API/ Bulk Drugs and Intermediate Category.
- The total production quantity after change in product mix will remain same i.e 25.2 MT/A as per the quantity granted in Environmental Clearance.

B. Pollution load Details: -

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix: -

Propose	Existing water Consumption in CMD	Proposed Changes in CMD	Water Consumption Break up after a change in product mix in CMD
INDUSTRIAL	-		-
Manufacturing Process	0.875	- 0.015	0.860
Air Pollution Control Systems (Scrubbers)	1	0	1
Cooling Tower	11.15	0	11.15




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Boiler	0.85	0	0.85
Industrial Washing	15.42	0	15.42
Green Belt	0.7	0	0.7
Total Industrial (I)	30		29.97
DOMESTIC (II)	5		5
Total (I+II)	35	- 0.015	34.98

- After a change in product mix industry has proposed reduction in process water consumption by 0.015 CMD.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Description	Existing Effluent Generation in CMD	Proposed Changes in CMD	Effluent Generation after Proposed change in product mix in CMD
Process	0.901	- 0.003	0.898
APCM	0.96	0	0.96
Boiler Blowdown	0.0357	0	0.0357
Cooling	0.9	0	0.9
Industrial Washing	7.20	0	7.20
Total Industrial	10	-0.003	9.99
Domestic	4	0	4

- After a change in product mix industry has proposed a reduction in Process effluent generation by 0.003 CMD.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent COD, BOD and TDS Pollution load				
Flow (CMD)	High TDS/ COD from Process and Scrubber - 1.86 CMD		Low TDS/ COD from Cooling, Boiler & Washing - 8.135 CMD	
Parameter	Mg/Lit	Kg/Day	Mg/Lit	Kg/Day
COD	17110.21	31.825	1342.07	10.917
BOD	6511.82	12.112	557.6	4.536
TDS	22608.6	42.052	867.15	7.054
Proposed after change in Product Mix COD, BOD and TDS Pollution load				

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Flow (CMD)	High TDS/ COD from Process and Scrubber 1.858 CMD		Low TDS/ COD from Cooling, Boiler & Washing - 8.135 CMD	
Parameter	Mg/Lit	Kg/Day	Mg/Lit	Kg/Day
COD	16700.75	31.03	1342.07	10.917
BOD	6380	11.854	557.6	4.536
TDS	21576.96	40.09	867.15	7.054

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by 2.498%, 2.13% and 4.66 % respectively.

C) Treatment System: -

Trade Effluent: - The trade effluent is segregated into High TDS/ High COD (1.86 CMD) & Low TDS/ Low COD (8.135 CMD).

- iv) **Strong COD/TDS stream of 1.86 CMD** - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank) and Reactor, the condensate collected from reactor is being treated in aeration tank of ETP.
- v) **Weak COD/TDS stream of 8.135 CMD** - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Secondary (Activated sludge process), Tertiary (Pressure sand filter, Activated carbon filter).
- vi) **Sewage effluent:** STP of capacity 7 CMD is provided for treatment of domestic sewage.

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

Stack No.	Stack attached to	Fuel	Fuel Consumption			APC System	Stack Height
			As per EC	As per Valid CTO	After change in Product Mix		
S-1	Boiler	LDO	1000 Lit./Day	1000 Lit./Day	1000 Lit./Day	Stack	12 meters

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S-2	DG Set	HSD	33.33 Kg/Day	33.33 Kg/Day	33.33 Kg/Day	Acoustic Enclosure	9 meter
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- Industry has not proposed any change in existing utilities.

ii) **Process Emissions and control Systems: -**

Stack No	Stack Attached to	APC system	Stack height	Scrubbing Media	Parameters
S-3	Process Reactor Vent	Scrubber	10.00	Alkaline	Acid Mist

- The process emission control system i.e. scrubber is installed. There is no additional process emissions and scrubber requirement after the proposed change in product mix.

E) Hazardous Waste Aspect: -

No.	Type of Haz. Waste and Category	As per CTO	As per EC	Proposed Changes	After Change in Product Mix	Disposal
1.	35.3 Chemical Sludge from Wastewater Treatment	15 Kg/M	15 Kg/M	0	15 Kg/M	CHWTSDF
2.	28.1 Process Residue and Waste	35 Kg/M	35 Kg/M	- 19.25 Kg/M	15.75 Kg/M	CHWTSDF
3.	28.3 Spent Carbon	150 Kg/M	150 Kg/M	0.43 Kg/M	3.57 Kg/M	CHWTSDF
4.	5.1 Used Oil / Spent Oil	10 Lit./M	10 Lit./M	0	10 Lit./M	Sale to authorized recycler
5.	33.1 Empty barrels/containers/ liners contaminated with hazardous chemicals /wastes	50 Nos./M	--	0	50 Nos./M	Sale to authorized recycler

- After the proposed change in product mix the industry has proposed reduction in total Hazardous waste by 19.68 Kg/M.

Technical Committee Deliberation:

The project proposal was discussed based on presentation made and documents- NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. M/s. Element Consultancy Services, No.- Nil, Date. - Nil and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:-

- 1) The industry is existing and engaged in manufacturing of API/Bulk Drugs and Intermediates.
- 2) Industry has obtained Environmental Clearance for 7 Nos. of API /Intermediates products for total production quantity 25.2 MT/A and obtained Consent to Operate (Part) for 3 Nos. of products for total production quantity 15 MT/A.
- 3) Industry has proposed a change in the product mix in comparison with Environmental Clearance by deletion of 5 Nos. of products, no change in capacity of 2 Nos. of existing products and addition of 9 Nos. of new products in the same API/ Bulk Drugs and Intermediate Category.
- 4) The total production quantity after change in product mix will remain same i.e 25.2 MT/A as per the quantity granted in Environmental Clearance.
- 5) After a change in product mix industry has proposed reduction in process water consumption by 0.015 CMD and reduction in Process effluent generation by 0.003 CMD.
- 6) Industry has segregated the strong stream effluent and weak stream effluent and provided separate treatment system to the strong stream effluent. The condensate of the strong stream is taken in ETP and treated with weak stream effluent.
- 7) The average COD, BOD and TDS load after change in product mix is proposed to reduce by 2.498%, 2.13% and 4.66 % respectively.
- 8) Industry has not proposed any change in existing utilities. The process emission control system i.e. scrubber is installed. There is no additional process emissions and scrubber requirement after the proposed change in product mix.
- 9) After the proposed change in product mix the industry has proposed reduction in total Hazardous waste by 19.68 Kg/M.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.




- 2) Industry shall ensure connectivity of OCEMS data to Board server.
 - 3) Industry shall comply with the mechanism for Environmental management prepared by Central Pollution Control Board for CEPI listed areas, as industry falls under Severely Polluted Area (SPA) of CEPI.
 - 4) Industry shall achieve TPM-50 mg/NM3 being the unit is in CEPI area, as per MPC Board policy, and accordingly consent shall be amended for the stringent standards.
 - 5) Industry shall ensure disposal of Hazardous Waste to the actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.
 - 6) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."
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MAHARASHTRA POLLUTION CONTROL BOARD

Agenda item No	No. 4
Proposal No.	MPCB-CONSENT-0000209365
Project Details	M/s. DRT-Anthea Aroma Chemicals Pvt. Ltd., Plot No.: 51-A/1, Roth Budruk, Tal. Roha, Dist. Raigad-402116.
NIPL Certificate	NIPL certificate issued by M/s. Goldfinch Engineering Systems Pvt. Ltd., No.- Nil, Date.- 08.08.2024.

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000209365 along with the copies of documents seeking Renewal of Consent to Operate along with the amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing specialty aroma chemicals and intermediates.

Existing Clearances: -

1. Environmental clearance SEIAA Government of Maharashtra, vide No EC 2008 11 /CR 1 on 30.01.2010 for production capacity 8400 TPA.
2. The amendment in Consent to Operate was accorded by the Board vide No: Format 1 0 /CAC/UAN No 0000006908 / 2402000001, dated 05.02.2024 which is valid up to 28.02.2024.

Project details: -

A. Production Details: -

Sr no.	Product Name	As per EC, MT/A	As per CTO, MT/A	Proposed (+) Addition & (-) Deletion, MT/A	Proposed After CIPM , MT/A
1.	Anthamber	3600	3600	0.0	3600
2.	Methyl Pentenone	2400	2400	-1200	1200
3.	Dihydromyrcenol	2400	2400	1200	3600
	Total	8400	8400	0.0	8400

- Industry has proposed a change in the product mix in its existing facility by increasing production capacity of one Existing product by 1200 MT/A, decreasing production capacity of another one existing product by 1200 MT/A and keeping the total production capacity same as per the Environmental Clearance i.e 8400 MT/A.

**B. Pollution load Details:
Water & Wastewater Aspect: -**

i) Water consumption aspect before & after proposed change in Product Mix-

Propose	As Per EC CMD	As Per CTO CMD	After change in product mix, CMD	Proposed Additional Water Consumption
Process	350	60	58.5	Nil
Industrial cooling, spraying in mine pits or boiler feed		250	250	
Total Trade		310	308.5	
Domestic	350	20	20	Nil
Gardening		20	20	Nil
Grand Total		350	350	348.5

- After a change in product mix the total process water consumption is proposed to be reduced by 1.5 CMD after change in product mix.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Propose	As Per EC	Existing As Per CTO	Effluent Generation after proposed change in product mix, CMD	Mode of Disposal & Ultimate Receiving Body
INDUSTRIAL				
Process	60	60	58.6	CETP
Boiler feed				
Cooling Tower				
Total Industrial	60	60	58.6	
Domestic	18	18	18	
Gardening	0	0	0	
Grand Total	78	78	76.6	

- After a change in product mix Industry has proposed a decrease in the trade effluent by 1.4 CMD after change in product mix.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic:-		
(From Process, Cooling Tower & Boiler Blow downs and domestic)		
78 (60 Trade effluent+18 Domestic effluent)		
low (CMD) Parameter	Kg/Day	mg/L
COD	3697	47397
BOD	1726	22133
TDS	15181	194628
After Product Mix Effluent characteristic: -		
(From Process, Cooling Tower & Boiler Blow downs and domestic)		
76.6 (58.6 Trade effluent + 18 Domestic effluent)		
Flow (CMD) Parameter	Kg/Day	mg/L
COD	3164	41303
BOD	1602	20911
TDS	13451	175604

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 533 Kg/Day, 124 Kg/Day and 1730 Kg/Day respectively.

C) Treatment System: -

ii) Trade Effluent: - Effluent treatment plant Primary treatment system followed by Stripper, MEE followed by pusher centrifuge and ATFD. Condensate from MEE/ATFD along with domestic sewage is fed to secondary (Bio reactor), followed by tertiary (pressure sand filter and activated carbon filter) followed by RO. RO reject is fed to MEE.

ii) Sewage effluent: After primary treatment the sewage is connected to Effluent treatment Plant for further treatment & disposal.

D) Air Emission Aspect: -

iii) Flue Gas Emissions: -

Stack No.	Stack Attached to	As Per EC, Fuel Consumption	Existing as Per valid CTO and Renewal application	Fuel Consumption after Change in Product Mix	APC system	Stack Height
S-1	Steam Boiler (2 x 4 TPH)	Not mentioned	LSHS – 250kg/hr	LSHS – 250kg/hr	Stack	30 m
S-2	Thermic fluid heater (2 X 15 kcal/hr)	Not mentioned	LSHS – 200kg/hr	LSHS – 200kg/hr	Stack	30 m

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S-3	Steam Boiler (4 TPH)+Thermic fluid heater (15 Lakh kcal/hr)	Not mentioned	LSHS – 250kg/hr	LSHS – 250kg/hr	Stack	30 m
S-4	D.G. Set (1250 KVA)	Diesel – 250 litre/hr	Diesel – 340kg/hr	Diesel – 340kg/hr	Acoustic Enclosure	20 m
S-5	D.G. Set (1250 KVA)	Not mentioned	Diesel – 340kg/hr	Diesel – 340kg/hr	Acoustic Enclosure	20m

- Industry has not proposed any change in existing utilities and fuel quantities.

E) Hazardous Waste Aspect: -

Sr. No	Type of Waste	Cat. No.	As Per EC,	Existing as Per valid CTO and Renewal application, TPA	After a Change in product mix, TPA	Disposal
1	Used or Spent oil	5.1	50 kg/M (0.6 TPA)	2.4	2.4	Sale to authorized party / recycler/ CHWTSDF
2	Spent Carbon	28.3	Not mentioned	12	12	CHWTSDF
3	Glass wool	-	Not mentioned	12	12	CHWTSDF
4	Chemical sludge from wastewater treatment	35.3	300 kg/day (108 TPA)	2400	5916	CHWTSDF
	Concentration & Evaporation Residue	37.3	-	3516		
5	Empty barrels / containers /liners contaminated with hazardous chemicals/ wastes	33.1	Not mentioned	1200 Nos/A	1200 Nos/A	Sale to Authorized Party / Recycle/ CHWTSDF

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6	Contaminated cotton rags or other cleaning materials	33.2	Not mentioned	6	6	CHWTSDF
7	Tops & High Boilers from the distillation operations of Anthamber, Dihydromyrcenol and Methyl Pentenone i.e. Anthamber Terpenes, Methyl Pentenone HF, Dihydromyrcenol Terpenes, Anthamber HB Terpenes, Dihydromyrcenol HB Terpenes	-	Not mentioned	2040	2039.5	Sale to authorized party / CHWTSDF
8	35 % Phosphoric Acid	-	Not mentioned	1920	1920	Sale to authorized party / CHWTSDF
Total			50 kg/M and 300 kg/day (108.6 TPA)	9908.4 TPA and, 1200 Nos/A	9907.9 TPA and 1200 Nos/A	

- The total Hazardous Waste is increasing with respect to the quantities as per the Environmental Clearance and existing consent to operate. Industry has submitted that Hazardous wastes are not mentioned / less quantities are mentioned in the current valid consent to operate which was valid upto 28.02.2024. Now, hazardous waste quantities are taken as per the renewal application of CTO submitted on 07.02.2024, which are corrected values w.r.t current consent valid up to 28.02.2024.
- Also, the industry has installed MEE & ATFD the quantities of Concentration & Evaporation Residue are added due to upgradation of pollution control systems.

Technical Committee Deliberation:

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance,



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No Increase in Pollution Load certificate issued by M/s. Goldfinch Engineering Systems Pvt. Ltd., No.- Nil, Date.- 08.08.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:

- 1) The proposal for the amendment in consent to operate was discussed in the 2nd meeting of Technical Committee (2024-25) dtd 19.06.2024.
- 2) Previously the committee noted that the prior Environmental Clearance was accorded to the PP by Environment Department, Govt. of Maharashtra vide letter No. EC-2008/11/CR.1, Dated. 30.01.2010 under category 'B'. Now as per the MoEF & CC draft Notification S.O. 3072 (E), date. 06.07.2022 the said area falls under Eco Sensitive Zone and the Category of the said activity will now change from category 'B' to category 'A' project. However as per the MoEF & CC Notification dated. 02.03.2021 with respect to "No Increase in Pollution Load" for increase in production capacity without having to go through entire Environmental Clearance process again as long as there is no increase in Pollution load, has clarified that "Provided further that the provision of this clause (increase in production capacity without increase in pollution load) shall not be applicable if such change or increase results in change in category of project or activity from Category 'B2' to either Category 'A' or Category 'B1'.
- 3) Industry has submitted the request letter for review dtd. 31.07.2024 along with the revised proposal along with the revised NIPL Certificate and Parivesh Acknowledgement, without increase in total production capacity and only by interchanging the production quantities of existing products and keeping the total production capacity same.
- 4) The industry representative explained during the meeting that they are not going to increase the total production capacity of the earlier Consent to Operate and Environmental Clearance. There will be only change in product mix and there is no increase in pollution load.
- 5) Industry has proposed a change in the product mix in its existing facility by increasing production capacity of one existing product by 1200 MT/A, decreasing production capacity of another one existing product by 1200 MT/A and keeping the total production capacity same as per the Environmental Clearance i.e 8400 MT/A.
- 6) After a change in product mix the total process water consumption is proposed to be reduced by 1.5 CMD.
- 7) After a change in product mix Industry has proposed a decrease in the trade effluent by 1.4 CMD.
- 8) Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 533 Kg/Day, 124 Kg/Day and 1730 Kg/Day respectively.
- 9) Industry has not proposed any change in existing utilities and fuel quantities.
- 10) The total Hazardous Waste is increasing with respect to the quantities as per the Environmental Clearance and existing consent to operate, industry has submitted that Hazardous wastes are not mentioned / less quantities are mentioned in the current valid consent to operate which was valid upto 28.02.2024. Now, hazardous waste quantities are taken as per the renewal application of CTO submitted on 07.02.2024, which are corrected values. Also, the industry has installed MEE & ATFD, as per the directions issued by the Board to the industries for segregation and separate

treatment for strong stream, the quantities of Concentration & Evaporation Residue are added due to upgradation of pollution control systems.

- 1) The industry has accepted that they are ready to confine within the Environmental Clearance limits with respect to the production and pollution load as expansion is not allowed in Eco- Sensitive Zone.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
 - 2) Industry shall ensure connectivity of OCEMS data to Board server.
 - 3) Industry shall cover the collection and equalization tanks of Effluent Treatment Plant and shall provide scrubber to control the emissions.
 - 4) Industry shall ensure disposal of Hazardous Waste to the actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.
 - 5) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."
-



MAHARASHTRA POLLUTION CONTROL BOARD

Agenda item No	No. 5
Proposal No.	MPCB-CONSENT-0000211714
Project Details	M/s. DRT-Anthea Aroma Chemicals Pvt. Ltd. Plot No.: 49, 50, 51A, MIDC Dhatav, Tal. Roha, Dist. Raigad
NIPL Certificate	NIPL certificate issued by M/s. Goldfinch Engineering Systems Pvt. Ltd., No.- Nil, Date.- 09.08.2024.

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000211714 along with the copies of documents seeking the amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing specialty aroma chemicals and intermediates.

Existing Clearances: -

1. Environmental Clearance is granted to the industry by Environment Dept. Government of Maharashtra vide No SEAC-2012/CR-184/TC-2 dated 08.04.2015 for the total production capacity of 1505 TPM i.e. 18060 TPA.
2. The Consent to Operate was accorded by the Board vide No: vide No: - Format 1.0/ CAC/UAN No. 0000091847/CO-2009000497 dated 09.09.2020 valid up to 31.01.2025.

Project details: -

A. Production Details: -

LIST OF PRODUCTS		As per EC dated 08.04.2015	Existing Production as per CTO dated 09.09.2020	Addition (+)/ Deletion (-)	After Proposed Product Mix
Sr. No.	Name	MT/A	MT/A	MT/A	MT/A
1	Anthamber	3900	3900	-2100	1800
2	Anthamber CR (Preclomone)	0	0	2100	2100
3	Terpene Alcohols And Esters such as Dihydromyrcenol, Geraniol, Nerol, Linalool, Geranyl Acetate, Linalyl Acetate	3820	3820	0.0	3820

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	Neryl Acetate	0	0		
4	Methyl Pentenone	3120	3120	0.0	3120
	Boisamber	0	0		
5	Myrcene	7200	7200	0.0	4800
	Dihydromyrcene				
6	Dihydromyrcenol				2400
Total		18060	18060	0.0	18060

- Industry has proposed a change in the product mix in its existing facility by addition of one new product in the existing Group 2 i.e., Neryl Acetate and Group 3 i.e., Boisamber keeping total production capacity of Group same, Splitting of Gr. 4. (consists of 3 products) having capacity 7200 TPA into two parts. One part is consisting of two products (4800 TPA) and one part consists of one product (2400 TPA) and addition of one new product.
- In the proposed change in product mix the total production capacity will remain same i.e. 18060 MT/A.

B. Pollution load Details:

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix-

Particular	As Per EC, CMD	As Per CTO, CMD	After change in product mix, CMD
Process	112.5	188.5	187.23
Washing	6		
Boiler Feed	70	345	345
Cooling Tower	345		
Total Trade	533.5	533.5	532.23
Domestic	27.5	27.5	27.5
Gardening	20	20	20
Grand Total	581	581	579.73

- After a change in product mix the Total process water consumption is proposed to be reduced by 1.27 CMD after change in product mix.

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ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Propose	As Per EC, CMD	Existing As Per CTO, CMD	Effluent Generation after proposed change in product mix, CMD
Process	129.06	129.06	128.76
Boiler feed			
Cooling Tower			
Total Industrial	129.06	129.06	128.76
Domestic	22	22	22
Gardening	0	0	0
Grand Total	151.06	151.06	150.76

- After a change in product mix Industry has proposed a decrease in the trade effluent by 0.3 CMD after change in product mix.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic: -		
(From Process, Cooling Tower & Boiler Blow downs)		
Flow (CMD)	129.06	
Parameter	Kg/Day	mg/L
COD	9656	74813
BOD	4690	36335
TDS	23920	185324
After Product Mix Effluent characteristic: -		
(From Process, Cooling Tower & Boiler Blow downs)		
Flow (CMD)	128.76	
Parameter	Kg/Day	mg/L
COD	8903	69142
BOD	4381	34026
TDS	21101	163872

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 753 Kg/Day, 309 Kg/Day and 2819 Kg/Day respectively.

C) Treatment System: -

iii) **Trade Effluent:** - Effluent treatment plant Primary treatment system followed by Stripper, MEE followed by pusher centrifuge and ATFD. Condensate from MEE/ATFD is fed to secondary (Bio reactor), followed by tertiary (pressure sand filter and activated carbon filter) treatment followed by RO.

ii) **Sewage effluent:** - Domestic wastewater is treated separately in STP having designed capacity 30 CMD.

D) Air Emission Aspect: -

i) **Flue Gas Emissions: -**

Stack No.	Stack Attached to	As Per EC, Fuel Consumption	As Per Valid CTO, Existing Fuel Consumption	Fuel Consumption after Change in Product Mix	APC system	Stack Height
S-1	Boiler (3x4 TPH-1 standby)	Fused oil -64 TPD and Coal- 91 TPD	F.O 64 TPD	LSHS 64 TPD	Stack	46 m
S-2	Thermic Fluid Heater (3 x 15 Lakh kcal/Hr- 1 Standby)				Stack	46 m
S-3	D.G. Set (1700 KVA)	HSD- 350 Ltr/Hr	HSD- 350 Ltr/Hr	HSD- 350 Ltr/Hr	Acoustic Enclosure/Stack	28 m
S-4	D.G. Set (1700 KVA)	HSD- 350 Ltr/Hr	HSD- 350 Ltr/Hr	HSD- 350 Ltr/Hr	Acoustic Enclosure/Stack	28 m

- Industry has switched the fuel from FO to LSHS. Industry has not proposed any change in the existing utilities. There is no change the steam requirements. The fuel consumption of the boiler for the changed production profile will remain same.

ii) **Process emissions and control systems: -**

Sr. No.	Stack attached to	APC system	Scrubbing Media	Stack Height, m

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1	Process Vent-1	Scrubber	Alkaline/water	6.4
2	Process Vent-2	Scrubber	Alkaline/water	6.4

- Industry has submitted that in current consent to operate they have missed to mention two process vents but at actual there are two process vents at plant and industry had already applied for amendment for inclusion of these two process stacks.

E) Hazardous Waste Aspect: -

Sr. No	Type of Waste	Cat. No.	As Per EC, TPA	Existing as Per valid CTO and Amendment application dated 30.05.2024, TPA	After a Change in product mix, TPA	Disposal
1	Used or Spent oil	5.1	1.2	1.2	1.2	Sale to authorized party / CHWTSDF
2	Distillation Residue	20.3	12	12	12	Sale to authorized party / CHWTSDF
3	Contaminated cotton rags or other cleaning materials	33.2	0	6	6	CHWTSDF
4	Spent Carbon/filter medium	36.2	0	4.2	4.2	CHWTSDF
5	Other Hazardous waste (Glass Wool)	-	0	6	6	CHWTSDF
6	Empty barrels /containers /liners contaminated with hazardous chemicals /wastes	33.1	0	1200 Nos. /Y	1200 Nos. /Y	Sale to authorized party / CHWTSDF
7	Tops & High Boilers from the operations of Anthamber, Anthamber CR Dihydromyrcenol, Methyl Pentenone, Terpene Alcohols, and	-	5280	5280	3540	Sale to Authorized Party / CHWTSDF

	Dihydromyrcene (i.e. Anthamber Terpenes, Methyl Pentenone HF, Dihydromyrcenol Terpenes, Anthamber HB Terpenes, Dihydromyrcenol HB Terpenes, Geraniol Terpenes, Nerol Terpenes, Linalool Terpenes, Geraniol HB Terpenes, Nerol HB Terpenes, Linalool HB Terpenes and Dihydromyrcene HB Terpenes)					
8	Acetic Acid	-	0	0	780	Sale to Authorized Party / CHWTSDf
9	Phosphoric Acid	-	0	0	960	Sale to Authorized Party / CHWTSDf
10	35% Sulphuric Acid *OR	-	5520	5520	0	Sale to authorized party / CHWTSDf
	35 % Ammonium Sulphate *OR	-	8160	8160	0	Sale to authorized party / CHWTSDf
	Calcium Sulphate	-	3180	3180	11820	Sale to authorized party / CHWTSDf
11	Concentration and Evaporation residue	37.3	0	9264		Sale to authorized party / CHWTSDf
12	Chemical waste from Waste water	35.3	420	420		
Total			13873.2	23153.4 and 1200 Nos./ Y	17139.4 TPA and 1200 Nos./ Y	

- The total Hazardous Waste is increasing with respect to the quantities as per the Environmental Clearance and less than the consent to operate.

- Industry has submitted that they have upgraded existing ETP by installing MEE and stripper as per the directions issued by the Board for segregation and provision of separate treatment for strong stream to improve the treatment of effluent. Due to this upgradation of ETP, additional hazardous waste i.e., concentration and evaporation residue is being generated.
- Also, the industry has submitted that they have missed incorporating some hazardous waste such as spent carbon, Empty barrels /containers /liners contaminated with hazardous chemicals /wastes, glass wool and contaminated cotton rags or other cleaning materials. For this they applied for amendment in CTO (UAN No. MPCB-CONSENT-0000013688) dated 30.05.2024 for missed hazardous waste and evaporation residue.

Technical Committee Deliberation:

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. Goldfinch Engineering Systems Pvt. Ltd., No.- Nil, Date.- 09.08.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:

- 1) The proposal for the amendment in consent to operate was discussed in the 2nd meeting of Technical Committee (2024-25) dtd 19.06.2024.
- 2) The committee noted that the prior Environmental Clearance was accorded to the PP by Environment Department, Govt. of Maharashtra vide letter SEAC-2012/CR- 184/TC-2 Dated. 08.04.2015 under category 'B'. Now as per the MoEF & CC draft Notification S.O. 3072 (E), date. 06.07.2022 the said area falls under Eco Sensitive Zone and the Category of the said activity will now change from category 'B' to Category 'A' project.
- 3) However as per the MoEF & CC Notification dated. 02.03.2021 with respect to "No Increase in Pollution Load" for increase in production capacity without having to go through entire Environmental Clearance process again as long as there is no increase in Pollution load, has clarified that " Provided further that the provision of this clause (increase in production capacity without increase in pollution load) shall not be applicable if such change or increase results in change in category of project or activity from Category 'B2' to either Category 'A' or Category 'B1'.
- 4) Industry has submitted the request letter for review dtd. 31.07.2024 along with the revised proposal along with the revised NIPL Certificate and Parivesh Acknowledgement by keeping the total production capacity same.
- 5) The industry representative explained during the meeting that they are not going to increase the total production capacity of the earlier Consent to Operate and Environmental Clearance. There will be only change in product mix and there is no increase in pollution load.
- 6) Industry has proposed a change in the product mix in its existing facility by addition of one new product in the existing Group 2 i.e., Neryl Acetate and Group 3 i.e., Boisamber keeping total production capacity of Group same, Splitting of Gr. 4. (consists of 3 products) having capacity 7200 TPA into two parts. One part is consisting of two products (4800 TPA) and one part consists of one product (2400 TPA) and addition of one new product.

- 7) In the proposed activity, the total production capacity will remain same i.e. 18060 MT/A.
- 8) After a change in product mix the Total process water consumption is proposed to be reduced by 1.27 CMD after change in product mix.
- 9) After a change in product mix Industry has proposed a decrease in the trade effluent by 0.3 CMD.
- 10) Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 753 Kg/Day, 309 Kg/Day and 2819 Kg/Day respectively.
- 11) Industry has switched the fuel from FO to LSHS. Industry has not proposed any change in the existing utilities. There is no change the steam requirements. The fuel consumption of the boiler for the changed production profile will remain same.
- 12) Industry has submitted that in current consent to operate they have missed to mention two process vents but at actual there are two process vents at plant and industry had already applied for amendment for inclusion of these two process stacks.
- 13) The total Hazardous Waste is increasing with respect to the quantities as per the Environmental Clearance. Industry has submitted that they have upgraded existing ETP by installing MEE and stripper as per the directions issued by the Board for segregation and provision of separate treatment for strong stream to improve the treatment of effluent. Due to this upgradation of ETP, additional hazardous waste i.e., concentration and evaporation residue is being generated. Also, the industry has submitted that they have missed incorporating some hazardous waste such as spent carbon, Empty barrels /containers /liners contaminated with hazardous chemicals /wastes, glass wool and contaminated cotton rags or other cleaning materials. For this they applied for amendment in CTO (UAN No. MPCB-CONSENT-0000013688) dated 30.05.2024 for missed hazardous waste and evaporation residue.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
- 2) Industry shall ensure connectivity of OCEMS data to Board server.
- 3) Industry shall cover the collection and equalization tanks of Effluent Treatment Plant and shall provide scrubber to control the emissions.
- 4) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."
- 5) Industry shall ensure disposal of Hazardous Waste to the actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.

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Agenda item No	Agenda No. 6
Proposal No.	MPCB-CONSENT-0000205618
Project Details	M/s. Viyash Life Sciences Pvt. Ltd., Plot No. 1-A/2 & 1-A/3, MIDC Taloja, Navi Mumbai, Tal.- Panvel, Dist. – Raigad.
NIPL Certificate	NIPL certificate issued by M/s. Envirosphere Consultant and Engineers LLP. Date 27.03.2024

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000205618 along with the copies of documents seeking Renewal of Consent to Operate along with the amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing API /Drug and Intermediates.

Exiting Clearances: -

1. Environmental clearance was accorded by SEIAA Government of Maharashtra, vide No SEAC-2013/CR-249/TC-2 dt. 01.12.2014 for manufacturing of API / Drug Substances and their intermediate 49.990 MT/A and the EC letter was transferred from M/s. Mylan Laboratories Limited to M/s. Viyash Life Sciences Private Limited vide No. SIA/MH/IND2/12560/2021 dt. 09.12.2021.
2. The consent to operate was accorded to M/s. Mylan Laboratories Limited by the Board under change in product mix vide No: - Format 1.0/CC/ UAN No.0000081249/ CO 2008000997 dt. 26.08.2020 which was valid upto 30.04.2021.
3. Later the Board has accorded Renewal of the Consent to Operate in name of M/s. Viyash Life Sciences Private Limited vide consent no Format 1.0 / AS(T)/UAN No.0000136726/CR / 2210001018, Date.13.10.2022 which was valid upto 30.04.2024.

Project details: -

A. Production Details: -

Sr. No.	Name of Product	Existing as per CTO, MT/A	Proposed (+) addition/ (-) Deletion, MT/A	Proposed after change in product mix, MT/A	Remark (*)
1	Bosentan- (BOM IV & BST IV)	2	0	2	No Change
2	Rasagiline mesylate- (RAG)/(RAS)III	0.025	(+) 0.025	0.05	Increased
3	Vorinostat	0.02	(-) 0.02	0	Deleted
4	Clopidogrel hydrogen bromide	10.745	(-) 10.745	0	Deleted
5	Lenalidomide	0.2	(+) 0.6	0.8	Increased
6	Sunitinib maleate	0.01	(-) 0.01	0	Deleted
7	Zofenopril	5.1	(-) 3.6	1.5	Decreased

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8	Formoterol Fumarate dihydrate	0.02	(-) 0.01	0.01	Decreased
9	Salmeterol Xinafoate (BFA) XII/ (FFD) VIII/ (MPA) XII	0.03	(-) 0.03	0	Deleted
10	Rivastigmine Hyd.Tartrate (RHT) XII/(RVH) II	2	0	2	No Change
11	Osteoporosis / Residronate Sodium	0.01	(-) 0.01	0	Deleted
12	Erlotinib Hydrochloride	0.05	(-) 0.05	0	Deleted
13	Letrozole	0.5	(-) 0.48	0.02	Decreased
14	Proguanil HCL (PRO) I	4	(+) 1	5	Increased
15	Pregablin	2	(-) 2	0	Deleted
16	Febuxostat IB	5	(-) 2	3	Decreased
17	Capecitabine 6000	6	(-) 5.9	0.1	Decreased
18	Roflumilast	0.05	0	0.05	No Change
19	Imatinib Mesylate	0.1	(-) 0.1	0	Deleted
20	Atropine	0.1	(-) 0.1	0	Deleted
21	Olopatadine Hydrochloride	0.01	(-) 0.01	0	Deleted
22	Tizanidine HCL	0.1	(-) 0.05	0.05	Decreased
23	Pramipexole HCL/(PMB) / (PRA) IV / (PRJ) III	0.1	0	0.1	No Change
24	Frovatriptan	0.05	0	0.05	No Change
25	Adefovir Dipivoxil	0.1	(-) 0.1	0	Deleted
26	Rotogotin	0.6	(-) 0.1	0.5	Decreased
27	Tolvaptan (TLV) V / (TOL) I	0.05	(-) 0.05	0	Deleted
28	Diphenoxylate	1.8	(-) 1.8	0	Deleted
29	Fluticasone Propionate	1.8	(-) 1.8	0	Deleted
30	Dimethyl Fumarate	5	(+) 12.6	17.6	Increased
31	Other Validation products	0.5	(+) 4.54	5.04	Increased
32	Prasugreal Hydrochloride / (PSH) III/ (PRS) IV/(PRJ)IV	1	(+) 1	2	Increased
33	Saxagliptin	0.05	(+) 0.05	0.1	Increased
34	Palbociclib	0.2	0	0.2	No Change
35	Fingolimod	0.02	(+) 0.08	0.1	Increased
36	Epinephrine (EPI)IV/ Bitartrate (EPB) /ENA) IV	0.1	(+) 0.4	0.5	Increased
37	Thiotepa	0.05	(-) 0.04	0.01	Decreased
38	Ticagrelor	0.1	(+) 2.4	2.5	Increased

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39	HAMDHCL	0.1	(-) 0.1	0	Deleted
40	Macitendan	0.05	(+) 0.05	0.1	Increased
41	Pomalidomide (POM)	0.2	0	0.2	No Change
42	Premetrexed Disodium 2.5 H2O (PED V)	0.05	(-) 0.025	0.025	Decreased
43	Selexipag	0	(+) 0.1	0.1	New Product
44	Vilazodone	0	(+) 1.2	1.2	New Product
45	Glycopyrrolyte	0	(+) 0.115	0.115	New Product
46	Apixaban	0	(+) 2.5	2.5	New Product
47	Linagliptin	0	(+) 0.5	0.5	New Product
48	Ivacaftor	0	(+) 1	1	New Product
49	Viloxazine	0	(+) 0.42	0.42	New Product
50	DDM	0	(+) 0.05	0.05	New Product
51	Levormeloxifene Fumarate	0	(+) 0.5	0.5	New Product
Total Production Capacity		49.990 MT/A	0.00	49.990 MT/A	Total production quantity will remain same

- Industry has proposed a change in the product mix by deletion of 15 Nos. of existing products, decreasing the production capacity of 24 Nos. of existing products and increase in capacity of 3 Nos. of existing products and addition of 9 Nos. of new products in the same API/ Bulk Drugs and Intermediate Category.
- Industry has proposed the total production quantity after change in production quantity will remain same i.e 49.990 MT/A.

B. Pollution load Details:

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix-

Propose	As Per EC in CMD	As-Per CTO in CMD	Proposed reduction after CIPM in CMD	After change in product mix, CMD
Processing whereby water gets polluted & pollutants are easily biodegradable	24	24	0.07	23.93
Industrial Cooling, spraying in mine pits or boiler feed	72.5	72.5	0	72.5

Total Industrial Consumption	96.5	96.5	0.07	96.43
Domestic	10	10	0	10
Gardening	8	8	0	8
Grand Total	114.5	114.5	0.07	114.43

- After a change in product mix industry has proposed reduction in process water consumption by 0.07 CMD.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Purpose	Existing Effluent Generation (KLD)	Effluent Generation Breakup after change in product mix (KLD)	Proposed Change
Process	8.07956	8.00528	Reduced
Scrubber	2.5	2.5	No Change
Reactor Wash	14	14	No Change
Boiler	1	1	No Change
Cooling Tower	10	10	No Change
Domestic	10	10	No Change

- After a change in product mix industry has proposed a reduction in Process effluent generation by 0.07428 KLD.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing Effluent COD, BOD and TDS Pollution load: -		
Parameter	Kg/Day	Mg/L
COD	276.99	34,282.80
BOD	125.90	15,583.09
TDS	611.71	75,710.80
After Product Mix Effluent COD, BOD and TDS Pollution load: -		
Parameter	Kg/Day	Mg/L
COD	264.12	32,993.22
BOD	120.05	14,996.92
TDS	581.30	72,614.57

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 4.65%, 4.65% and 4.97% respectively.

C) Treatment System: -

Trade Effluent: -

- Strong COD/TDS stream of 8 CMD** - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Stripper, Multi effect evaporator (3 stage) of 10 CMD and ATFD.
- Weak COD/TDS stream of 38.4 CMD** - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Secondary (Activated sludge process), Tertiary (Pressure sand filter, Activated carbon filter), Advance treatment (Reverse osmosis).
- Sewage effluent:** After primary treatment the sewage is connected to Effluent treatment Plant for further treatment & disposal.
- Total treated trade and domestic effluent is recycled back in utilities to achieve 100% Zero Liquid Discharge (ZLD).

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

Stack No.	Stack Attached to	Fuel Consumption as per EC	Existing fuel Consumption	Proposed Fuel Consumption after CIPM	APC system	Stack Height, m
S-1	Boiler 2 nos. (1 Operational & 1 Standby)	LDO- 51.66 kg/Hr.	LDO- 51.66 kg/Hr. [OR] Natural Gas- 1000 SCM/Day.	Natural Gas- 1000 SCM/Day.	Stack	30
S-2	DG Set (1500 kVA)	HSD- 200 Ltr/Hr.	HSD- 200 Ltr/Hr.	HSD- 200 Ltr/Hr.	Stack	9

- Industry has not proposed any change in existing utilities.
- Industry has proposed to stop the LDO as fuel and now completely shifted to cleaner fuel i.e. Natural gas.

ii) Process Emissions and control Systems: -

No.	Stack No	Stack Attached to	APC system	Stack height	Scrubbing Media	Parameters
1	S-3	MB-01 Intermediate Block	Scrubber	16.00	Alkaline	Acid Mist, Ammonia, HCL, H ₂ S, HI, HF
2	S-4	MB-01 Process Plant	Scrubber	13.00	Alkaline	
3	S-5	MB-01 Isolated scrubber plant	Scrubber	13.00	Alkaline	
4	S-6	MB-02 HVAC-I	Scrubber	13.00	Alkaline	
5	S-7	HVAC -II emergency	Scrubber	13.00	Alkaline	
6	S-8	QC Isolator	Scrubber	13.00	Alkaline	

- The process emission control system i.e. scrubbers are installed. There is no additional process emissions and scrubber requirement after proposed change in product mix.

E) Hazardous Waste Aspect: -

Sr. No.	Type of Waste	Category (As per Schedule)	Generation		Remark	Mode of Treatment & Disposal
			Existing	After Change in Product Mix		
1.	Used or spent oil	5.1	7000 Lit/A	7000 Lit/A	No Change	Sale to authorised party / CHWTSDF
2.	Off specification Products	28.4	74 MT/A	74 MT/A	No Change	Sale to authorised party / CHWTSDF
3.	Process Residue and wastes	28.1	225 MT/A	223.5 MT/A	Reduce by 1.5 MT/A	Sale to authorised party / CHWTSDF
4.	Chemical sludge from wastewater treatment	35.3	40 MT/A	40 MT/A	No Change	CHWTSDF
5.	Spent ion exchange resin containing toxic metals	35.2	5 MT/A	5 MT/A	No Change	CHWTSDF

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6.	Off specification products	28.4	2 MT/A	2 MT/A	No Change	Sale to authorised party / CHWTSDF
7.	Concentration or evaporation residues	37.3	238 MT/A	236 MT/A	Reduce by 2 MT/A	Sale to authorised party / CHWTSDF
8.	Exhaust Air or Gas cleaning residue	35.1	2 MT/A	2 MT/A	No Change	Sale to authorised party / CHWTSDF
9.	E-Waste	-	25 MT/A	25 MT/A	No Change	CHWTSDF / Recycler
10.	Personal protective equipment's after use	-	2 MT/A	2 MT/A	No Change	CHWTSDF

- After a change in proposed mix the Hazardous waste categories 28.1 Process Residue and Waste is reduced by 1.5 MT/A and 37.3 Concentration or evaporation residue reduced by 2 MT/A.

Technical Committee Deliberation:

The project proposal was discussed based on presentation made and documents- NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. Envirosphere Consultant & Engineers LLP., No. Nil, Date. 27.03.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:

- 1) The industry is existing and engaged in manufacturing of API/Bulk Drugs and Intermediates.
- 2) Industry has proposed a change in the product mix by deletion of 15 Nos. of existing products, decreasing the production capacity of 24 Nos. of existing products and increase in capacity of 3 Nos. of existing products and addition of 9 Nos. of new products.
- 3) The industry has proposed the total production quantity of the API and its intermediate will remain same i.e. 49.990 MT/A as per EC and CTO.
- 4) After a change in product mix industry has proposed reduction in Process effluent generation by 0.07428 KLD. Total treated trade and domestic effluent is recycled to achieve 100% Zero Liquid Discharge (ZLD).
- 5) After a change in product mix industry has proposed reduction in average COD, BOD and TDS load by about 4.65%, 4.65% and 4.97% respectively.
- 6) Industry has not proposed any change in existing utilities. Industry has proposed to stop the LDO as fuel and now completely shifted to cleaner fuel i.e. Natural gas.

- 7) The process emission control system i.e. scrubbers are installed. There is no additional process emissions and scrubber requirement after the proposed change in product mix.
- 8) After a change in the proposed mix the Hazardous waste categories 28.1 Process Residue and Waste is reduced by 1.5 MT/A and 37.3 Concentration or evaporation residue reduced by 2 MT/A. Industry has proposed reduction in total Hazardous Waste by 3.5 MT/A.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
- 2) Industry shall ensure connectivity of OCEMS data to Board server.
- 3) Industry shall comply with mechanism for Environmental management prepared by Central Pollution Control Board for CEPI listed areas, as industry falls under Severely Polluted Area (SPA) of CEPI.
- 4) Industry shall achieve TPM-50 mg/NM3 being the unit is in CEPI area as per MPC Board policy and accordingly consent shall be amended for the stringent standards.
- 5) Industry shall ensure disposal of Hazardous Waste to the actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.
- 6) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."

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Agenda item No	No. 7
Proposal No.	MPCB-CONSENT-0000202694
Project Details	M/s. Godavari Biorefineries Ltd., (GBL) Gut No. 159-165, 180/1, 180/2, 181/1, 181/2, 187/1, 187/2, 188, 189, 199, 158, 167-178, 511, 139-2 Sakarwadi Taluka - Kopergaon , District – Ahmednagar.
NIPL Certificate	NIPL certificate issued by M/s Sadekar Enviro Engineers Private Limited., No. Nil, Date: Nil

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000202694 along with the copies of documents seeking the amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing Synthetic Organic Products.

Existing Clearances: -

1. Environmental Clearance is accorded to the industry by MoEF and CC vide No F. No. IA-J-11011/154/2019-IA-II(I), dated 06.08.2021.
2. The Consent to Operate was accorded by the Board vide No: Format1.0/CAC/UAN No.0000154055/CO/2302001917, Date. 27.02.2023 valid upto 31.08.2024.

Project details: -

A. Production Details: -

Sr. No.	Product Category	Product Name	EC Quantity (MT/M)	CTO Quantity (MT/M)	Total Quantity after NIPL Quantity (MT/M)
1	ESTER	Ethyl Acetate	8700	5400	5400
2		Dilute Ethyl Acetate and other ester	30	30	30
3		3- Methoxy Butyl Acetate	340	25	25
4		Diethyl Oxalate	175	20	20
5		Ethyl Crotonate (623-70-1)	20	20	

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6	Methyl Crotonate (623-43-8)			
7	Methyl beta amino crotonate (14205-39-1)			
8	Ethyl Beta Amino Crotonate (7318-00-5)			
9	Butane diol Polyester (24937-93-7)			20
10	Ethyl Butyrate (105-54-4)			
11	Diethyl Succinate (123-25-1)			
12	Dimethyl Phthalate (131-11-3)			
13	Isopropyl Crotonate (6284-46-4)			
14	Hexyl Acetate (142-92-7)			
15	Hexyl Salicylate (6259-76-3)			
16	Diethyl Pthalate (84-66-2)			
17	Isopropenyl Acetate (108-22-5)			
18	Methyl Acrylate (96-33-3)			
19	Ethyl Propionate (105-37-3)			
20	Styralyl Acetate (93-92-5)			
21	1- Ethoxy Ethyl Acetate (1608-72-6)			
22	Sorbyl Acetate (1516-17-2)			
23	Ethyl Formate (109-94-4)			
24	Butyl Acetate (123-86-4)			100
25	Propyl Acetate (109-60-4)			25
26	Dibutyl Itaconate (2155-60-4)			50
27	Triacetin (102-76-1)			50
28	butylbutyrate (109-21-7)			
29	2-Ethylhexyl acetate (103-09-3)			
30	Cis-3-Hexenyl Salicylate (65405-77-8)			
31	2-Ethylhexyl butyrate (25415-84-3)			
32	Cis-3-Hexenyl Acetate (3681-71-8)	0	0	300
33	Cis-3-Hexenyl Butyrate (16491-36-4)			
34	Cis-3-Hexenyl Isobutyrate (41519-23-7)			
35	Cis-3-Hexenyl Hexanoate (31501-11-8)			
36	Cis-3-Hexenyl cis-3-hexanoate (61444-38-0)			
37	Triethyl Citrate (77-93-0)	0	0	50
38	Tributyl Citrate (77-94-1)	0	0	50
39	Diethyl Itaconate	0	0	50
40	Iso propyl acetate	0	0	50
41	Isoamyl acetate	0	0	25

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42		Ethyl Nicotinate	0	0	10
43	ETHER	Ethyl Vinyl Ether	100	25	100
44		Iso butyl Vinyl Ether (109-53-5)	15	15	30
45		Methyl Vinyl Ether (107-25-5)			
46		Butyl Vinyl Ether (111-34-2)			
47		Diethyl Ether (60-29-7)			
48	ALDEHYDES	Acetaldehyde	2800	2000	2000
49		Crotonaldehyde	1000	1000	1000
50		Acetaldol	425	425	425
51		Paraldehyde	60	60	200
52		Butyraldehyde (123-72-8)	200	20	200
53		2-Ethylbutyraldehyde (97-96-1)			
54		2 Ethyl Crotonaldehyde (19780-25-7)			
55		Cinnamaldehyde (14371-10-9)			
56		Sorbaldehyde (142-83-6)			
57		Hexyl Cinnamaldehyde (101-86-0)			
58		2- Ethyl Hexenal (645-62-5)			
59		2 Ethyl Hexanal (123-05-7)			
60		Dimethyl-3-Cyclohexene-1-Carboxaldehyde (67801-65-4 & 27939-60-2)			
61		1,1-Bis (3,4-dimethylphenyl) ethane (1742-14-9)			
62		1,1-Di-p-Tolylethane (530-45-0)			
63	Trans 2-Hexenal (6728-26-3)				
64	AMIDE	Croto Resin and Croto Di Urea	130	90	90
65		Niacinamide	0	0	30
66	GLYCOL	1,3 Butylene Glycol	200	200	200
67		Dilute/Impure 1-3 Butylene Glycol	32.22	32.22	32.22
68		2- Ethyl,1,3 Hexane Diol	33.33	33.33	33.33
69		Propylene Glycol	0	0	50
70		Ethylene Glycol	0	0	10
71	ACID	Acetic Acid	598.85	598.85	598.85
72		Dilute Acetic Acid	110	110	110
73		Butyric Acid (107-92-6)	15	0	15
74		Crotonic acid (107-93-7)			
75		M-Toluic Acid (99-04-7)			
76		Benzoic Acid (65-85-0)			
77		Nicotinic acid	0	0	60

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78		Sorbic Acid or Potassium Sorbate	500	0	50	
79	ALCOHOL	Butanol	117.7	117.7	200	
80		3-Methoxy Butanol	275	25	25	
81		Dilute 3 Methoxy Butanol	30	2.7	2.7	
82		Absolute Alcohol (Fuel Grade from RS/IS)	2000	2000	0	
83		Crotyl Alcohol (6117-91-5)	20	20	20	
84		Impure Crotyl Alcohol (6117-91-5)				
85		Isobutanol (78-83-1)				
86		Tri Methalol Propane (77-99-6)				
87		2,5-Furan dimethanol (1883-75-6)				
88		Phenyl Ethyl Alcohol (60-12-8)				
89		Phenyl methyl carbinol (98-85-1)				
90		Isoamyl Alcohol (123-51-3)				
91		Polycosanal (142583-61-7)				20
92		N-hexanol (111-27-3)				100
94		Cinnamic Alcohol (104-54-1)	7	7		
95		2-Ethyl-1-Butanol (97-95-0)	1.3	31		
96		2-Ethyl Hexanol (104-76-7)	12	0	0	
97		Waxes	0	0	50	
98		Sorbic Alcohol	0	0	50	
99		Cis-3-Hexenol	500	500	400	
100	KETONES	3- Methyl 3-Pentene-One (MPO)	197.5	197.5	197.5	
101		Ketone Mixture	100	0	50	
102		Gbamber	15	15	15	
103		Valerolactone (108-29-2)				
104		3-Methyl -2-Pentanone (565-61-7)				
105		Methyl Ethyl Ketone (78-93-3)				
106		Acetone (67-64-1)				
107		Diethyl ketone (96-22-0)				
108		Acetophenone (98-86-2)				
109		4-Hydroxy 2-Butanone (590-90-9)	0	0	50	
110	Methyl Isopropyl Ketone (MIPK)	15	0	0		
111	KETENE	Ethenone (463-51-4)	175	20	20	
112	OXIMES	Acetaldehyde Oxime	15	0	0	
113		Butyraldehyde oxime (110-69-0)				
114		Methyl ethyl ketone oxime (96-29-7)				

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115	ACETALS	Acetaldehyde Diethyl Acetal	250	25	25			
116		Acetaldehyde Dimethyl Acetal (534-15-6)	15	15	15			
117		Formaldehyde Dimethyl Acetal (109-87-5)						
118		Formaldehyde Diethyl Acetal (462-95-3)						
119		Acetaldehyde Dibutyl Acetal (871-22-7)						
120		Acetaldehyde Di Iso Propyl Acetal (4285-59-0)						
121		Acetaldehyde Di-Iso Amyl Acetal (13002-09-0)						
122		Crotonaldehyde Diethyl Acetal (10602-34-3)						
123		Butyraldehyde dimethyl acetal (4461-87-4)						
124		Butyraldehyde diethyl acetal (3658-95-5)						
125		Cinnamaldehyde Diethyl Acetal (7148-78-9)						
126		Tri Ethoxy Butane (5870-82-6)						
127		Tri methoxy Butane (6607-66-5)						
128		Acetaldehyde Propylene Glycol Acetal (3390-12-3)						
129		Trans 2-Hexenal Propylene Glycol Acetal (94089-21-1)						
130	NITRILES	Propionitrile (107-12-0)				20	20	20
131		Butyronitrile (109-74-0)						
132		Isobutyronitrile (78-82-0)						
133		Valeronitrile (110-59-8)						
134		Acetonitrile						
135		Crotonitrile	425	20	20			
136	SALTS	Sodium Benzoate (532-32-1)	19.64	8.33	8.33			
137		Sodium Chloride (7647-14-5)						
138		Ammonium sulfate (7783-20-2)						
139		Sodium Sulfate (7757-82-6)						
140		Sodium Sulphate				245	245	245
141		Ammonium Sulphate				139.7	15.97	15.97
142	Pyridine	MEP (Methyl Ethyl Pyridene)	0	0	50			
143	Anhydride	Crotonic Anhydride	10	8.33	8.33			
		TOTAL	20090.94	13378.05	13145.05			
144	--	Turbine - (Captive Power Plant)	7.1 MWH	5.6 MW	5.6 MW			

- Industry has proposed change in product mix by decreasing the capacity of 2 Nos. of products, increase in production capacity of 32 Nos. of existing products, introducing 23 Nos. of new products under the same category and keeping the production capacity of 85 Nos. of products same.
- Industry has proposed to decrease the total production quantity from 13378.05 TPM to 13145.05 TPM.

B. Pollution load Details: -

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix: -

Particular	As Per EC, CMD	Existing as Per CTO, CMD	After change in product mix, CMD
Process	496	253.5	249.19
Washing and other Activities			
Cooling Tower & Boiler (Utility)	4833	2222.5	2222.5
Total Trade	5329	2476	2471.69
Gardening	219	219	215
Domestic purpose	235	215	219
Grand Total	5783	2910	2905.7

- After a change in product mix the Total process water consumption is proposed to be reduced by 4.3 CMD after change in product mix.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Particular	As Per EC, CMD	Existing as Per CTO, CMD	After change in product mix, CMD
Process	1082	596	592.82
Cooling Tower & Boiler (Utility)			
Total Industrial	1082	596	592.82
Domestic purpose	223	200	200
Grand Total	1305	796	792.82

- After a change in product mix Industry has proposed a decrease in the trade effluent by 3.18 CMD after change in product mix.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic: -	
	From Process and Utilities blowdown
Flow (CMD)	596 CMD
Parameter	Kg/Day
COD	2336.96

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BOD	671
TDS	793.15
After Product Mix Effluent characteristic:-	
	From Process and Utilities blowdown
Flow (CMD)	592.82 CMD
Parameter	Kg/Day
COD	2213.67
BOD	664
TDS	785.31

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 123.29 Kg/Day, 7 Kg/Day and 7.84 Kg/Day respectively.

C) Treatment System: -

- Trade Effluent:** - Effluent Treatment Plant (ETP) of designed capacity of 600.00 CMD consisting of Primary (Collection tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank, Anaerobic Digester (UASB)), Secondary (Activated sludge process), Tertiary (Pressure sand filter, Activated carbon filter), Advanced treatment (Reverse osmosis, Multi effective evaporator). Existing ZLD status will be maintained after change of product mix.
- Sewage effluent:** - Domestic wastewater is treated in 02 Nos. of Sewage Treatment Plant of designed capacity 200 CMD and 50 CMD.

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

Stack No.	Stack attached to	Stack height in meter	APCM	Before Change in product mix		After change in product mix	
				Parameter	Permissible limit	Parameter	Permissible limit
1	Boiler 30 TPH	52	ESP	TPM	115mg/Nm3	TPM	115mg/Nm3
				SO2	1362 Kg/Day	SO2	1362 Kg/Day
2	ISGEC Boiler - (18 TPH)	30	ESP	TPM	115 mg/Nm3	TPM	115 mg/Nm3
				SO2	817.2 Kg/Day	SO2	817.2 Kg/Day

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3	D.G. Set- (1000 KVA)	9	Acoustic enclosure	TPM	115 mg/Nm3	TPM	115 mg/Nm3
				SO2	72 Kg/Day	SO2	72 Kg/Day
4	D.G. Set- (590 KVA)	6	Acoustic enclosure	TPM	115 mg/Nm3	TPM	115 mg/Nm3
				SO2	31.20 Kg/Day	SO2	31.20 Kg/Day

- Industry has not proposed any changes in the steam requirements. The fuel consumption of the boiler will remain the same.

E) Hazardous Waste Aspect: -

Sr. No.	H.W. Category	EC Quantity	CTO Quantity	Quantity after NIPL	Disposal
1	37.3 Concentration or evaporation residues	18.6 TPD (15.3 TPD + 3.3 TPD)	0.3 MT/Day	0.3 MT/Day	CHWTSDF
2	1.6 Spent catalyst and molecular sieves	181.4 kg/day	3.65 MT/A	3.58 MT/A	Sale to authorized party/CHWTSDF
3	1.4 Organic residues	8 CMD	8 CMD	8 CMD	CHWTSDF
4	35.2 Spent ion exchange resin containing toxic metals	--	1.2 MT/A	1.2 MT/A	CHWTSDF
5	28.3 Spent carbon	0.3 TPD	31 MT/A	31 MT/A	CHWTSDF
6	36.1 Any process or distillation residue	14.192 MT/day	0.192 MT/Day	0.192 MT/Day	CHWTSDF

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7	35.3 Chemical sludge from wastewater treatment	0.3 MT/Day	1.5 MT/Day	1.5 MT/Day	CHWTSDF
8	Used Discarded PPE's	0.5 MT/A	1 MT/A	1 MT/A	CHWTSDF
9	5.1 Used or spent oil	3 KL/A	1.2 KL/A	1.2 KL/A	Authorized Recycler/CHWTSDF
10	20.2 Mixed Solvent	5 KLD	--	1 KLD	Authorized Recycler/CHWTSDF

Total Hazardous Waste:-

Total Hazardous waste (TPM)	As per EC	As per Existing CTO	After CIPM
	1397.49	302.93	332.57

- After a change in product mix the total hazardous waste is proposed to increase by 29.64 TPM, however the quantity will remain within the Environmental Clearance quantity.

Technical Committee Deliberation: -

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s Sadekar Enviro Engineers Private Limited., No. Nil, dated. Nil and product-mix proforma are taken on the record.

Committee after due deliberation noticed that: -

- 1) Industry has proposed change in product mix by decreasing the capacity of 2 Nos. of products, increase in production capacity of 32 Nos. of existing products, introducing 23 Nos. of new products under the same category and keeping the production capacity of 85 Nos. of products same.
- 2) Industry has proposed to decrease the total production quantity from 13378.05 TPM to 13145.05 TPM.
- 3) After a change in product mix the Total process water consumption is proposed to be reduced by 4.3 CMD after change in product mix.
- 4) After a change in product mix Industry has proposed a decrease in the trade effluent by 3.18 CMD after change in product mix.

- 5) Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 123.29 Kg/Day, 7 Kg/Day and 7.84 Kg/Day respectively.
- 6) Industry is Zero Liquid Discharge unit and the status will be maintained after change of product mix.
- 7) Industry has not proposed any changes in the steam requirements. The fuel consumption of the boiler will remain the same.
- 8) After a change in product mix the total hazardous waste is proposed to increase by 29.64 TPM compared to existing Consent to operate, however the quantity will remain within the Environmental Clearance limit.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
- 2) Industry should not manufacture any other product for which permission is not granted by the MPCB.
- 3) Industry shall comply with the Boards Circular dtd. 05.02.2020 for use of cleaner fuel.
- 4) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."



MAHARASHTRA POLLUTION CONTROL BOARD

Agenda item No	No. 8
Proposal No.	MPCB-CONSENT-0000208478
Project Details	M/s. OC Specialities Pvt. Ltd., Plot No. E-16, E- 17, E-18 , E-22 & OS -23, Chincholi MIDC, Taluka - Mohol, District – Solapur.
NIPL Certificate	NIPL certificate issued by M/s. Sadekar Enviro Engineers Private Limited., No. Nil, Date: Nil

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000208478 along with the copies of documents seeking the renewal of consent to operate along with amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing of Fine Chemicals and API Intermediates.

Existing Clearances: -

1. Environmental Clearance is accorded to the industry by MoEF and CC, GoI vide No. EC21A021MH152058, F. No. J-11011 / 92/2015-IA-II (I) dated 02.10.2021.
2. The Consent to Operate was accorded by the Board vide No: Format 1.0 / CC / UAN No. 0000139938 / CO / 2209001934, Dtd. 20.09.2022 valid up to 30.06.2024.

Project details: -

A. Production Details: -

Sr.no.	Name of the Product	As pe EC, TPA	Existing as per CTO, TPA	After NIPL, TPA	Remark
1	Sodium Bromide Sol. 40%	4680	4680	4680	Remain same
	Sodium Bromide Powder	2782.8	2782.8	2782.8	Remain same
	Zinc Hydroxide	1270.8	1270.8	1270.8	Remain same
2	Di Isopropyl Ethylamine (DIPEA)	816	816	800	Reduced
3	2,3 Dichloro Pyridine	1500	1500	200	Reduced
4	2,6 Dichloro Benzoyl Chloride	266.4	266.4	266.4	Remain same
5	2,5-Dimethyl Phenyl Acetyl Chloride	350	350	400	Increased
6	Ethyl-1-Hydroxy Cyclohexane Carboxylate	700	700	500	Reduced
7	Ethyl-1-Hydroxy Cyclopentane Carboxylate	700	700	500	Reduced

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8	3-Chloro-2-Hydrazinyl Pyridine	1500	1500	500	Reduced
9	2,4,6 Trimethyl Phenyl Acetyl Chloride	500	500	300	Reduced
10	2,6 Dimethoxy Benzoic acid	200	200	500	Increased
11	Methyl-2-Chloropropionate	600	600	500	Reduced
12	2-Methoxy Benzoic Acid	447.6	447.6	700	Increased
13	Amido Chloride	700	700	700	Remain same
14	N-Methyl-2-Oxo-2-Phenyl Acetamide	100	100	200	Increased
15	Fluoro Trifluoromethyl Phenol	300	300	200	Reduced
16	2,6 Dichlorobenzonitrile	300	300	300	Remain same
17	2,6 Dimethoxy Benzoyl Chloride	200	200	0	Deleted
18	S-2-Chloro Propionic Acid	200	200	50	Reduced
19	S-Methyl-2chloro propionate	200	200	50	Reduced
20	Ethyl-2-Chloropropionate	300	300	300	Remain same
21	2-Methoxy Propionic Acid (MEPRA)	200	200	200	Remain same
22	Methyl 2,3 Dichloro Propionate	300	300	500	Increased
23	(2-Chloro-4-Fluoro-5-Nitro phenyl) ethyl carbonate	150	150	150	Remain same
24	3-Methyl Pyradizine (3-MP)	100	100	25	Reduced
25	Ortho Chloro Benzamide (OCBA)	300	300	100	Reduced
26	Chlorinated Paraffin Wax (CPW)	1000	1000	0	Deleted
27	BPCA (3-bromo-1-(3-chloropyridin-2-yl)-1H - pyrazole-5-carboxylic acid)	200	200	200	Remain same
28	API & Intermediate	2500	2500	2500	Remain Same
29	2-Amino 5-Cyano N,3-dimethyl benzamide. (CYD)	0	0	100	New
30	2-Chloro-N,N dimethyl benzylamine(OCDMBA)	0	0	2000	New
31	2-Amino-5-Chloro-N,3-Dimethylbenzamide(CAMA)	0	0	500	New
32	Dichloroacetyl chloride(DiCAT)	0	0	1000	New
33	4-acetyl-2-methyl benzoic acid (AMBA)	0	0	400	New
34	methyl 1,3,4 -trimethyl-1H-pyrazole-5-carboxylate(TMPCM)	0	0	10	New
35	2-methoxy-N-{4-[(methylcarbamoyl)amino] benzene-1-sulfonyl}benzamide (MCF)	0	0	50	New

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36	p- tertiary butyl benzyl cyanide (TBBC)	0	0	50	New
37	3,5-Dimethyl Benzoyl chloride	0	0	200	New
38	4-hydroxy-3-(2,4,6-trimethylphenyl)-1-oxaspiro[4.4]non-3-en-2-one (Spiro)	0	0	100	New
	Total Production	23363.6	23363.6	23785	

- Industry has proposed the change in product mix in the same Fine Chemicals and API Intermediates category by decreasing the capacity of 15 nos. of consented products, increasing the capacity of 08 nos. of existing consented products, deleting the 2 No. of existing consented products, introducing the 10 nos. of new products under same category and 11 nos. of products will be remain same as per consent quantity.
- The production quantity a per the Environmental Clearance and existing consent to operate is 23363.6 TPA and after CIPM production quantity will be increased by 1.8%. i.e 23785 TPA for manufacturing of Fine Chemicals and API Intermediates.

**B. Pollution load Details: -
Water & Wastewater Aspect: -**

i) Water consumption aspect before & after proposed change in Product Mix: -

Water Consumption	As per EC	As per current CTO	After Change in Product Mix
Processing whereby water gets polluted & pollutants are easily biodegradable	136	105	104
Industrial Cooling, Spraying in mine pits or boiler feed	550	575	575
Domestic	20	20	20
Gardening	40	40	40
Total	746	740	739

- Total process water consumption is proposed to be reduced by 1.0 CMD than the existing consented quantity after change in product mix.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Water Consumption	As per EC	As per current CTO	After Change in Product Mix	Mode of Disposal
Process, R&D, Washing Activity & Scrubber	217.5	217.5	216.4	

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Boiler and Cooling Tower Blow Down	57	57	57	Recycle 100% to achieved Zero Liquid Discharge (ZLD)
Domestic Sewage	16	16	16	STP and treated sewage will be recycled & reused for Green belt developed
Gardening	0	0	0	

- After a change in product mix Industry has proposed a decrease in the trade effluent by 1.1 CMD after change in product mix.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic: -	
	From Process and Utilities blowdown
Flow (CMD)	274.5 CMD
Parameter	Kg/Day
COD	15531.08
BOD	4699
TDS	39460.92
After Product Mix Effluent characteristic:-	
	From Process and Utilities blowdown
Flow (CMD)	273.4 CMD
Parameter	Kg/Day
COD	14378
BOD	4494.53
TDS	36087

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 1153.08 Kg/Day, 204.47 Kg/Day and 3373.92 Kg/Day respectively.

C) Treatment System: -

i) Trade Effluent: -

Industry has segregated two stream such as (HTDS/HCOD) strong stream from process & (LTDS/LCOD) low stream from utility blow down.

Strong COD/TDS stream of 208 CMD - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Stripper, Multi effect evaporator and ATFD.

Weak COD/TDS stream of 65.5 CMD - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Secondary (Activated sludge process), Tertiary (Pressure sand filter, Activated carbon filter), Advance treatment (Reverse osmosis).

ii) Sewage effluent: - Domestic wastewater is treated in Sewage Treatment Plant of designed capacity 20 CMD.

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

Sr. No.	As per E.C.	Existing as per CTO	After CIPM	APCD
1	1 no. x Boiler (3 TPH capacity) Fuel type: Briquette	Boiler (3 TPH capacity) Fuel type: Briquette Fuel Quantity: 1400 kg/hr.	Boiler (3 TPH capacity) Fuel type: Briquette Fuel Quantity: 1400 kg/hr.	Multi Cyclone dust collector followed by bag filter with stack 30 m height
2	1 no. x TFH (6 Lac Kcal/hr. capacity) Fuel type: Briquette	TFH (6 Lac Kcal/hr. capacity) Fuel type: Briquette Fuel Quantity: 100 kg/hr.	TFH (6 Lac Kcal/hr. capacity) Fuel type: Briquette Fuel Quantity: 100 kg/hr.	
3	1 no. x Boiler (16 TPH capacity) Fuel type: Briquette	Boiler (16 TPH capacity) Fuel type: Briquette Fuel Quantity: 4000 kg/hr	Boiler (16 TPH capacity) Fuel type: Briquette Fuel Quantity: 4000 kg/hr	Multi Cyclone dust collector followed by bag filter with stack 31 m height
4	1 no. x TFH (12 Lac Kcal/hr. capacity) Fuel type: Briquette	TFH (12 Lac Kcal/hr. capacity) Fuel type: Briquette Fuel Quantity: 200 kg/hr. Stack height: 31 m.	TFH (12 Lac Kcal/hr. capacity) Fuel type: Briquette Fuel Quantity: 200 kg/hr Stack height: 31 m.	

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5	2 no. x DG set (1250 KVA capacity) Fuel type: HSD	DG set (2 No. X 1250 KVA capacity) Fuel type: HSD Fuel Quantity: 500 L/hr.	DG set (2 Nos. X 1250 KVA capacity) Fuel type: HSD Fuel Quantity: 500 L/hr.	Acoustic Enclosure with stack 20 m height
6	2 no. x DG set (380 KVA capacity) Fuel type: HSD	DG set (2 No. X 380 KVA capacity) Fuel type: HSD Fuel Quantity: 150 L/hr.	DG set (2 No. X 380 KVA capacity) Fuel type: HSD Fuel Quantity: 150 L/hr.	Acoustic Enclosure with stack 20 m height
7	2 nos. x DG set (100 KVA capacity) Fuel type: HSD	DG set (2 No. X 100 KVA capacity) Fuel type: HSD Fuel Quantity: 75 L/hr.	DG set (100 KVA capacity) Fuel type: HSD Fuel Quantity: 75 L/hr.	Acoustic Enclosure with stack 20 m height

- Industry has not proposed any changes in the steam requirements, existing utilities. The fuel consumption will remain the same.

ii) **Process Emissions aspect: -**

Stack No.	Stack attached to	Stack height in meter	APCD	Before Change in product mix		After change in product mix	
				Parameter	Permissible limit	Parameter	Permissible limit
1	Process Reactor-1 (SO ₂)	3.00	scrubber	SO ₂ (process)	50 PPM	SO ₂ (process)	50 PPM
2	Process Reactor-2 (NH ₃)	3.00	scrubber	NH ₃	30 Mg/ Nm ³	NH ₃	30 Mg/ Nm ³
3	Process Reactor-3 (HBr)	3.00	scrubber	HBr	5 Mg/ Nm ³	HBr	5 Mg/ Nm ³
4	Process Reactor-4 (NO _x)	3.00	scrubber	NO _x	50 PPM	NO _x	50 PPM
5	Process Reactor-5 (HCl)	6.00	scrubber	HCl	30 Mg/ Nm ³	HCl	30 Mg/ Nm ³
6	Process Reactor-6 (HCN)	3.00	scrubber	--	--	--	--

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- Industry has provided scrubbers to control the process emissions. Industry has not proposed any additional parameter than the existing consent to operate.

E) Hazardous Waste Aspect: -

Sr. No.	Cat.	Hazardous waste description	Unit	As per EC	As per CTO	After CIPM	Disposal	Remark
1	28.1	Process Residue and wastes	TPM	20	20	10.7	CHWTSDf	Decrease
2	20.3	Distillation residues	TPM	65.20	65.20	63.2	Sale to Authorized recycler/ re-processing/ Co-processing/CHWTSDf	Decrease
3	35.3	Chemical sludge from wastewater treatment	TPM	571.50	571.50	571.50	CHWTSDf	No change
4	37.3	Concentration or evaporation residues	TPM	360	360	360	CHWTSDf	No change
5	28.3	Spent carbon	TPM	1.70	1.70	1.25	Sale to Authorized recycler/ re-processing/ Co-processing/CHWTSDf	Decrease
6	28.2	Spent catalyst	TPM	3.50	3.50	1.98	CHWTSDf	Decrease
7	33.1	Empty barrels / containers / liners contaminated with hazardous chemicals / wastes	Nos. /M	90	90	90	Sale to authorized party/ CHWTSDf	No change
8	36.2	Spent carbon or filter medium	TPM	60	60	60	Sale to Authorized recycler/ re-processing/ Co-processing/CHWTSDf	No change

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9	28.5	Date-expired products	TPM	5	5	5	Re-processing/ Co-processing/CHWTSDF	No change
10	28.6	Spent organic solvents	TPM	90	90	88.16	Sale to Authorized recycler/ re-processing/ Co-processing / CHWTSDF	Decrease
11	35.4	Oil and grease skimming	Lit/M	50	50	50	Sale to authorized party / CHWTSDF	No change
12	-	Sodium Sulphite Solution (25%)	TPA	-	3984.84	3229.56	Sale to authorized party / CHWTSDF	Decrease
13	-	Hydrochloric Acid Solution (30%)	TPA	-	2347.08	2339.04	Sale to authorized party / CHWTSDF	Decrease
14	-	Sodium Nitrite Soln. (30%)	TPA	-	365.04	364.8	Sale to authorized party / CHWTSDF	Decrease
15	-	Distillation Residue of Pxylene	TPA	-	43.2	42.84	Sale to authorized party / CHWTSDF	Decrease
16	-	Ammonium Chloride Solution	TPA	-	432	369.48	Sale to authorized party / CHWTSDF	Decrease
17	-	Sodium Bromide Solution	TPA	-	1212	659.89	Sale to authorized party / CHWTSDF	Decrease
18	-	Spent Catalyst for Regeneration	TPA	-	474	146.28	Sale to authorized party / CHWTSDF	Decrease

- After CIPM the total quantity of hazardous waste will decrease by around 157.3 TPM of the current CTO.
- As compared to EC the Hazardous Waste quantity 738.18 TPM is increased in existing CTO due to the by-products are shifted under the hazardous waste.

Technical Committee Deliberation: -

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s Sadekar Enviro Engineers Private Limited., No. Nil, dated. Nil and product-mix proforma are taken on the record.

Committee after due deliberation noticed that: -

- 1) Industry has proposed the change in product mix in the same Fine Chemicals and API Intermediates category by decreasing the capacity of 15 nos. of consented products, increasing the capacity of 08 nos. of existing consented products, deleting the 2 No. of existing consented products, introducing 10 nos. of new products under same category and 11 nos. of products will remain same.
- 2) The production quantity as per the Environmental Clearance and existing consent to operate is 23363.6 TPA and after CIPM production quantity will be increased by 1.8%. i.e 23785 TPA for manufacturing of Fine Chemicals and API Intermediates.
- 3) Total process water consumption is proposed to be reduced by 1.0 CMD than the existing consented quantity after change in product mix.
- 4) After a change in product mix Industry has proposed a decrease in the trade effluent by 1.1 CMD.
- 5) Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 1153.08 Kg/Day, 204.47 Kg/Day and 3373.92 Kg/Day respectively.
- 6) Industry has segregated the strong stream trade effluent and weak stream trade effluent and provided separate treatment system. Industry will maintain Zero Liquid Discharge status.
- 7) Industry has not proposed any changes in the steam requirements, existing utilities. The fuel consumption will remain the same.
- 8) Industry has provided scrubbers to control the process emissions. Industry has not proposed any additional parameter than the existing consent to operate.
- 9) After CIPM the total quantity of hazardous waste will decrease by around 157.3 TPM of the current CTO.
- 10) As compared to EC the Hazardous Waste quantity 738.18 TPM is increased in existing CTO due to the claimed by-products are shifted under the hazardous waste.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
- 2) Industry shall ensure connectivity of OCEMS data to Board server.
- 3) Industry should not manufacture any other product for which permission is not granted by the MPCB.
- 4) Industry shall comply with the Boards Circular dtd. 05.02.2020 for use of cleaner fuel.
- 5) Industry shall cover the equalization tank of Effluent Treatment Plant and shall provide pollution control system to control the emissions.
- 6) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."



MAHARASHTRA POLLUTION CONTROL BOARD

Agenda item No	No. 9
Proposal No.	MPCB-CONSENT-0000210251
Project Details	M/s Deepak Nitrite Limited, Plot No: K-9 & K-10, MIDC Taloja, Tq. Panvel, Dist. Raigad.
NIPL Certificate	NIPL certificate issued by Goldfinch Engineering Systems Pvt. Ltd., No. Nil, Date: 20.06.2024

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000210251 along with the copies of documents seeking the 3rd time amendment for change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing Synthetic Organic Products and allied products.

Existing Clearances: -

1. Environmental Clearance is accorded to the industry by MoEF and CC vide No J-11011/367/2016-IA-II (I) dated 03.01.2018 for the total production capacity of 1440 TPM i.e. 17280 TPA.
2. The Consent to Operate was accorded by the Board vide No: Format 1.0/ AS(T)/UAN No. MPCB CONSENT-0000191059/CR/2402001562 dated 20.02.2024 valid up to 28.02.2029.

Project details: -

A. Production Details: -

Sr. No.	Name of Product	As per EC, TPA	Existing as per CTO, TPA	Addition(+)/ Deletion (-), TPA	After proposed change in product mix, TPA
1	Toluidine (Ortho or Meta or Para)	1800	1500	0	1500
2	Xylidine (2,3 or 2,4 or 2,5 or 2,6 or 3,5 or 3,4) [OR] Xylidine Derivatives as Xylenol (2,3 or 2,4 or 2,5 or 2,6 or 3,5 or 3,4)	3540	2400	0	2400
3	Cumidine (Ortho or Meta or Para) (Process Modification)	3240	2400	1200	3600
4	Phenylenediamine (Ortho or Meta or Para) [OR] 2,4-Difluoroaniline	600	360	180	540

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5	Dimethylcyclohexanone (DMCH)	5100	3600	0	3600
6	Aminobenzotrifluoride (Ortho or Meta or Para) [OR]	1800	4320	-720	3600
	5-amino-2-bromobenzotrifluoride (BABTF)				
7	Benzhydrol OR Cyclohexenylethylamine (CHEA) [OR]	1200	1020	-180	840
	Homoveratrylamine (HVA) [OR]				
	4-(2-Methoxyethyl) Phenol.(4 MEP) [OR]				
	Cumidine (Ortho or Meta or Para) (Process Modification) OR 6-COT and 4-COT				
8	{Butanol, 3-Methyl Anisole, Aniline, 4- Bromo-3-Methyl Anisole} [OR]	0	1680	-480	1200
	Nitroxylyene [OR]				
	Nitrocumene [OR]				
	Nitrotoluene [OR]				
	2,4-Difluoroaniline (Purification Only) [OR]				
6-COT and 4-COT (Purification Only)					
Total		17280	17280	0	17280

- Industry has proposed change in product mix by addition of 5 new products, No Change in 4 Existing Products, decrease in production capacity of 9 existing products & Increase Production of 2 Existing Products.
- Industry has proposed that the total production will remain same i.e. 17280 TPA.

B. Pollution load Details:-

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix: -

Particular	As Per EC, CMD	Existing as Per CTO, CMD	After change in product mix, CMD
Process	319	51.7	51
Washing and other Activities		254	254
Cooling Tower & Boiler (Utility)		305.7	305
Total Trade			
Gardening		2	2
Domestic purpose		9	9
Grand Total	319	316.7	316

- After a change in product mix the Total process water consumption is proposed to be reduced by 0.7 CMD after change in product mix.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Particular	As Per EC, CMD	Existing as Per CTO, CMD	After change in product mix, CMD
Process	75	58.8	58.6
Cooling Tower & Boiler (Utility)		14	14
Total Industrial	75	72.8	72.6
Domestic purpose	Not Mentioned	7	7
Grand Total	75	79.8	79.6

- After a change in product mix Industry has proposed a decrease in the trade effluent by 0.2 CMD after change in product mix.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic: -		
From Process and Utilities blowdown		
Flow (CMD)	72.8	
Parameter	Kg/Day	mg/L
COD	68.2	937

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BOD	32.6	448
TDS	123.1	1692
After Product Mix Effluent characteristic:-		
From Process and Utilities blowdown		
Flow (CMD)	72.6	
Parameter	Kg/Day	mg/L
COD	60.1	828
BOD	28.8	396
TDS	115.7	1593

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 8.1 Kg/Day, 3.8 Kg/Day and 7.4 Kg/Day respectively.

C) Treatment System: -

- i) **Trade Effluent:** - Total trade effluent amounting to 72.6 CMD generated from process and utilities is being treated combinedly in conventional effluent treatment plant consisting of primary treatment (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Secondary treatment (Activated sludge process), tertiary Treatment (Pressure sand filter, activated carbon filter) and sludge treatment (Sludge drying Bed). Tertiary treated effluent is sent to CETP.
- ii) **Sewage effluent:** - Domestic wastewater is sent to Septic Tank and overflow is taken for gardening.

D) Air Emission Aspect: -

i) **Flue Gas Emissions: -**

Sr. No.	Stack No.	Stack Attached to	As per EC	Existing as per CTO	Fuel Consumption after Change in Product Mix	APC system	Stack Height, (m)
1	S-1	Boiler (IAEC) 4TPH & Thermic Fluid Heater	F.O.	LSHS (premium) / PNG 220 Kg/Hr	No Change	Stack	32



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2	S-2	Boiler-(NESTLER) (5 TPH)	F.O.	LSHS (premium) / PNG 220 Kg/Hr	No Change	Stack	32
3	S-6	DG Set 750 KVA	Not Mentioned	HSD 450 Ltr/Day	No Change	Acoustic Enclosure	17.5

- Industry has not proposed any changes in the steam requirements. The fuel consumption of the boiler for the changed production profile is proposed to remain the same as per the existing consent to operate.

ii) Process emissions and control systems: -

Sr. No.	Stack attached to	APC system	Stack Height, m
1	Hydrogenator-1 (Stream-ST-1A)	Scrubber	20*
2	Hydrogenator-2 (Stream-ST-1B)	Scrubber	20*
3	Hydrogenator-3 (Stream-ST-II)	Scrubber	20*

- Industry has submitted there are no changes in the process emissions.
- Industry has proposed that in valid CTO, height mentioned for Hydrogenator-1 (Stream-ST-1A), Hydrogenator-2 (Stream-ST-1B) and Hydrogenator-3 (Stream-ST-II) is 25 m each but at actual it is 20 m each.
- Industry has proposed that there is no emission of Acid Mist and Chlorine as there is no chlorine use in plant. Hence, the unit has requested to remove the mentioned process parameters.

E) Hazardous Waste Aspect: -

Sr. No	Type of Waste	Cat. No.	As Per EC, TPA	Existing as Per CTO, TPA	After Change in Product Mix Qty. TPA	Disposal
1.	Used or spent oil	5.1	0	21	21	Co-processing/Pre-processing/ Sale to authorized party/ CHWTSDF
2.	Spent Lube Oil	-	21	0	0	CHWTSDF
3.	Exhaust Air or Gas Cleaning Residue	35.1	0	8.04	8.04	Co-processing/Pre-processing/ Sale to

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						authorized party/ CHWTSDF
4.	Flue gas cleaning Residue	-	8	0	0	CHWTSDF
5.	Chemical Sludge from wastewater treatment	35.3	4	15.24	51.24	CHWTSDF
6.	Spent Chemicals	32.1	5	4.8	4.8	Co-processing/Pre-processing/ Sale to authorized party/ CHWTSDF
7.	Spent Catalyst	28.2	0	0.24	0.24	Co-processing/Pre-processing/ Sale to authorized party/ CHWTSDF
8.	Distillation Residue	20.3	70	69	142.6	Co-processing/Pre-processing/ Sale to authorized party/ CHWTSDF
9.	Process Waste: 2 Amino Benzo Trifluoride (2ABTF)	-	288	260.4	0	NA
10.	Process Waste: 4 Amino Benzo Trifluoride (4ABTF)	-	432	416.4		NA
11.	Process Residue and waste	28.1	0	0	563.9	Co-processing/Pre-processing/ Sale to authorized party/ CHWTSDF
	Total		828	795.12	791.82	

- The Chemical Sludge from wastewater treatment (35.3) is increasing from 15.24 MT/A to 51.24 MT/A. Industry submitted that trade Effluent generated from new products contains fluoride content and for the treatment of the same, they have propose to use CaCl_2 and lime instead of only Lime (In existing lime was being used for the treatment) to maintain the of fluoride content in the treated effluent.
- After a change in product mix the total hazardous waste is propose to reduce by 3.3 TPA.

Technical Committee Deliberation: -

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. Goldfinch Engineering Systems Pvt. Ltd., No.- Nil, Date. - 20.06.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:

- 1) Industry has proposed 3rd time Change in product mix.
- 2) Industry has proposed change in product mix by addition of 5 new products, No Change in 4 Existing Products, decrease in production capacity of 9 existing products & Increase Production of 2 Existing Products.
- 3) Industry has proposed that the total production will remain same i.e. 17280 TPA, keeping the pollution load within the consent limit.
- 4) After a change in product mix the Total process water consumption is proposed to be reduced by 0.7 CMD after change in product mix.
- 5) After a change in product mix Industry has proposed a decrease in the trade effluent by 0.2 CMD after change in product mix.
- 6) The average COD, BOD and TDS load after change in product mix is proposed to reduce by about 8.1 Kg/Day, 3.8 Kg/Day and 7.4 Kg/Day respectively.
- 7) Industry has not proposed any changes in the steam requirements. The fuel consumption of the boiler for the changed production profile is proposed to remain the same.
- 8) Industry has submitted there are no changes in the process emissions.
- 9) Industry has proposed that in valid CTO, height mentioned for Hydrogenator-1 (Stream-ST-1A), Hydrogenator-2 (Stream-ST-1B) and Hydrogenator-3 (Stream-ST-II) is 25 m each but at actual it is 20 m each.
- 10) Industry has proposed that there is no emission of Acid Mist and Chlorine. Hence unit has requested to remove the mentioned process parameters from consent to operate.
- 11) The Chemical Sludge from wastewater treatment (35.3) is increasing from 15.24 MT/A to 51.24 MT/A. Industry submitted that trade Effluent generated from new products contains fluoride content and for the treatment of the same, they have propose to use CaCl₂ and lime instead of only Lime (In existing lime was being used for the treatment) to maintain the of fluoride content in the treated effluent.
- 12) After a change in product mix the total hazardous waste is propose to reduce by 3.3 TPA.

Technical Committee Decision: -

Technical Committee decided to recommend the case for change in product mix based on "No Increase in Pollution Load" as per the provision of EIA notification 2006 with compliance of the following conditions;

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- 1) Industry shall comply with all the conditions stipulated in Environmental Clearance and ensure display/upload of six-monthly compliance monitoring report on their official website.
 - 2) Industry shall ensure connectivity of OCEMS data to Board server.
 - 3) Industry shall cover the equalization tank of Effluent Treatment Plant and shall provide pollution control system to control the emissions.
 - 4) Industry shall comply with the mechanism for Environmental management prepared by Central Pollution Control Board for CEPI listed areas, as industry falls under Severely Polluted Area (SPA) of CEPI.
 - 5) Industry shall achieve TPM-50 mg/NM3 being the unit is in CEPI area, as per MPC Board policy, and accordingly consent shall be amended for the stringent standards.
 - 6) Industry shall ensure disposal of Hazardous Waste to the actual user having permissions under Rule 9 of Hazardous and other Waste (M & TM) Rules, 2016.
 - 7) The condition shall be imposed as "If any submission of misleading information including NIPL certificate is noticed, then the consent issued under MoEF & CC Product Mix Circular dtd. 02.03.2021 and amendments thereto will stand automatically cancelled."
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MAHARASHTRA POLLUTION CONTROL BOARD

Agenda item No	No. 10
Proposal No.	MPCB-CONSENT-0000208827
Project Details	M/s. Honour Lab Limited., Unit 3A, Plot no. D - 10, MIDC Kurkumbh, Taluka - Daund, District - Pune
NIPL Certificate	NIPL certificate issued by M/s. SGM (Enviro) Pvt. Ltd., No. Nil, Date: 18.06.2024

Introduction: -

This has reference to the online proposal submitted vide No. MPCB-CONSENT-0000208827 along with the copies of documents seeking Renewal of Consent to Operate along with the amendment under change in product – mix under the provisions of EIA Notification, 2006 amended on 23.11.2016 & on 02.03.2021. This is an existing unit engaged in manufacturing of Bulk Drug Intermediates and Active Pharmaceutical Ingredients (API).

Existing Clearances: -

1. Environmental Clearance is accorded to the industry by SEIAA vide No No. SEAC-2015/CR-716/TC-2, Dated: 23.08.2016.
2. The Consent to Operate was accorded by the Board vide No: Format1.0 / CC / UAN No.0000109773 / CR /2206000215 dated 04.06.2022 valid up to 31.05.2024.

Project details: -

A. Production Details: -

Sr. No.	Product Name	UOM	Consented	Proposed Reduction	Proposed Addition	Production after change in product mix.	Remarks
1	Amino butyramide	MT/M	30	-16.5	0	13.5	Decreased
2	Amino chloro trifluoroacetophenone	MT/M	50	-27.5	0	22.5	Decreased
3	Amino purine	MT/M	50	-27.5	0	22.5	Decreased
4	Amino pyrimidinone	MT/M	50	-27.5	0	22.5	Decreased

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5	5 (Aminofluorooxypyrimidinyl)-oxathiolane carboxylic acid methyl ester	MT/M	20	-11	0	9	Decreased
6	Bicyclo nonane	MT/M	40	-22	0	18	Decreased
7	Aminodihydroxy butyloxy diphenyl hexane (BDH)	MT/M	24	-13.2	0	10.8	Decreased
8	Butyl diazaspirononone	MT/M	10	-5.5	0	4.5	Decreased
9	Carbonyl diimidazole	MT/M	70	-38.5	0	31.5	Decreased
10	Chloro methyl isopropyl carbonate	MT/M	30	-16.5	0	13.5	Decreased
11	Cyclopropyl amine	MT/M	30	-16.5	0	13.5	Decreased
12	Dibenxothiazepinone	MT/M	10	-5.5	0	4.5	Decreased
13	Dichlorophenyl dihydro-N-methyl naphthalenimine	MT/M	25	-13.75	0	11.25	Decreased
14	Ethynyl cyclopropane	MT/M	50	-27.5	0	22.5	Decreased
15	Ethyltoluenesulfonyl methylphosphate	MT/M	30	-16.5	0	13.5	Decreased
16	Hylopyridine carboxylic acid	MT/M	50	-27.5	0	22.5	Decreased
17	Magnesium tert Butoxide	MT/M	71	-39.05	0	31.95	Decreased
18	5-Methyl uridine	MT/M	60	-33	0	27	Decreased
19	Phthalimido Amlodipine	MT/M	20	-11	0	9	Decreased
20	1-(3-Dimethyl amino propyl)-3-ethyl carbodimide Hydrochloride	MT/M	0	0	10	10	New product
21	Moxifloxacin Hydrochloride	MT/M	0	0	10	10	New product
22	Eplerenone	MT/M	0	0	2	2	New product
23	Telmisartan	MT/M	0	0	20	20	New product

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24	Rupatadine Fumarate	MT/M	0	0	4	4	New product
25	4,5-Dimethyl-1,3-Dioxol-2-One	MT/M	0	0	10	10	New product
26	Teneligliptin Hydrobromide Hydrate	MT/M	0	0	2	2	New product
27	Bempedoic Acid	MT/M	0	0	2	2	New product
28	7-Chloro-1-cyclopropyl-6fluoro-4-oxo-1,4-dihydro-1,8-naphthyridine-3-carboxylic acid	MT/M	0	0	6.666667	6.666667	New product
29	Bis(4-Nitrophenyl)carbonate	MT/M	0	0	20	20	New product
30	Montelukast Sodium	MT/M	0	0	10	10	New product
31	Olmesartan Medoxomil	MT/M	0	0	5	5	New product
32	Deflazcort	MT/M	0	0	4	4	New product
33	(2S,3S,5S)-2-(2,6-Dimethyl Phenoxyacetyl) Amino-3-Hydroxy-5-Amino-1, 6-Diphenyl hexane (NAMPALLY)	MT/M	0	0	6.666667	6.666667	New product
34	Sodium Salt of R(+) Tetrahydro-2-thiofuroic acid (SWAPNA)	MT/M	0	0	10	10	New product
35	6-Fluoro-3-Oxo-3,4-Dihydro Pyrazine-2- Carbonitrile Compound With Dicyclohexyl Amine (1:1) / PCO	MT/M	0	0	10	10	New product
36	Favipiravir	MT/M	0	0	10	10	New product
37	Nitazoxanide	MT/M	0	0	10	10	New product
38	Dabigatran etexilate mesylate	MT/M	0	0	2	2	New product
39	1,1-[carbonylbis(oxy)] bis 2,5-pyrrolidinedione	MT/M	0	0	2	2	New product
40	Ticagrelor	MT/M	0	0	2	2	New product

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41	4,6-DICHLORO-2-(PROPYLTHIO) PYRIMIDIN-5-AMINE	MT/M	0	0	10	10	New product
42	1-Oxo-1,3-Dihydroisobenzofuran-5-Carbonitrile	MT/M	0	0	10	10	New product
	Final Total product	MT/M	720	- 396	178	502	Total production quantity as per EC is 720 MT/M

- Industry has proposed change in product mix by decreasing production capacity of 19 existing products & introducing 23 new products under the same category.
- Industry proposes to decrease the production quantity of existing product from 720 MT/M to 324 MT/M and proposed new product under No increase pollution load with quantity 178 MT/M. The total production quantity will be 502 MT/M after NIPL, which is within the EC and consent limit.

B. Pollution load Details: -

Water & Wastewater Aspect: -

i) Water consumption aspect before & after proposed change in Product Mix: -

Propose	As per the EC	Existing Water Consumption	Water Consumption Break up after change in product mix
INDUSTRIAL			
Process + APCM	Fresh Water consumption 532 CMD and Recycled water 174 CMD.	150	122
Boiler		100	100
Cooling		250	250
Washing		0	0
Gardening		27	27

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Other		0	0
Total Industrial		527	499
DOMESTIC		20	20

- After a change in product mix the Total process water consumption is proposed to be reduced by 28 CMD.

ii) Waste Water (Trade and Domestic effluent) aspects before & after proposed change in product mix: -

Propose	Existing Effluent Generation	Effluent Generation after proposed change in Product mix.
INDUSTRIAL		
Process + APCM	149	147
Boiler	5	5
Cooling	5	5
Washing	0	0
Other	0	0
Total Industrial	159	157
DOMESTIC	15	15

- After a change in product mix Industry has proposed a decrease in the trade effluent by 2.0 CMD.

iii) COD, BOD and TDS Pollution load existing and after proposed change in product mix: -

Existing effluent characteristic: -		
From Process and Utilities blowdown		
Flow (CMD)	149	
Parameter	Kg/Day	mg/L
COD	6028	40513
BOD	32.6	448
TDS	7638	51333
After Product Mix Effluent characteristic:-		
From Process and Utilities blowdown		
Flow (CMD)	147	

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Parameter	Kg/Day	mg/L
COD	5303	36153
BOD	28.8	396
TDS	4635	48900

- Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 725 Kg/Day, 3.8 Kg/Day and 3003 Kg/Day respectively.

C) Treatment System: -

- Trade Effluent:** - Total trade effluent amounting to 157 CMD generated from process and utilities is being transferred to another unit of Honour at plot no. A-88 through closed pipeline for treatment and disposal. Industry has provided combine ETP for plot no. D-10 and A-88 with design capacity 280 CMD consisting of primary, secondary and tertiary treatment with RO and MEE to achieve Zero Liquid Discharge.
- Sewage effluent:** - Provided and shared common sewage treatment system of capacity 50 CMD at Plot No. A-88. The treated wastewater is recycled and reused for gardening in non-monsoon season & is used for flushing and utility purpose (after disinfection) in monsoon season.

D) Air Emission Aspect: -

i) Flue Gas Emissions: -

Sr. No.	Stack Attached to	Fuel	Existing Fuel Consumption	Proposed Fuel Consumption	Stack Height
1	Boiler 1 & Boiler 2	Boiler 1: LDO	150 Lit/Hr	No any additional fuel required	30 m
		Boiler 2: Coal or Briquette	600 kg/Hr		
2	DG set-600 KVA	In CTO: Diesel	75 Lit/day	0	5 m
3	DG set-750 KVA (Standby)	HSD	0	162 lit/hr.	5 m

- Industry has not proposed any changes in the steam requirements and Boiler configuration.
- The fuel consumption of the boiler for the changed production profile is proposed to remain the same.
- Industry has proposed new D.G Set (Standby) under change in product mix.

ii) Process emissions and control systems: -

Sr. No.	Stack attached to	Pollution Control Systems	Stack Height, m
1	Existing Process vent scrubber 1	Adequate stack height, Exhaust fan and wet/dry scrubber	5*
2	Proposed Process vent scrubber 2	Adequate stack height, Exhaust fan and wet/dry scrubber	5*
3	Proposed Process vent scrubber 3	Adequate stack height, Exhaust fan and wet/dry scrubber	5*
4	Proposed Process vent scrubber 4	Adequate stack height, Exhaust fan and wet/dry scrubber	5*

- Industry propose to install three new process vent double stage scrubbers in three separate production blocks for each manufacturing product.
- The industry has not submitted the comparison of the Air Pollution Load with respect to the additional parameters for process emissions in comparison to the existing pollution load.

E) Hazardous Waste Aspect: -

Sr. No	Name of waste	Quantity As per EC in MT/M	Quantity As per CTO	Calculated Quantities which should have been in the EC/CTO based on the existing capacity of 720 MT/M.	Proposed Quantity of waste for production 502 MT/M	Disposal
1	ETP Sludge	Quantity not mentioned in EC	1244 MT/A	1244 MT/A	1244 MT/A	CHWTSDF
2	Forced Evaporation Salts	Quantity not mentioned in EC	Quantity not mentioned in CTO	2749.68 MT/A	778 MT/A	CHWTSDF
3	Spent carbon	Quantity not mentioned in EC	30 MT/A	931.32 MT/A	510 MT/A	CHWTSDF

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4	Process Salts	Quantity not mentioned in EC	30 MT/A	3295.08 MT/A	950 MT/A	CHWTSDF
5	Spent solvents	Quantity not mentioned in EC	300 KL/A	3384.36 MT/A	1083 MT/A	Sale to authorized party / CHWTSDF
6	Mixed recovered Solvents	Quantity not mentioned in EC	Quantity not mentioned in CTO	--	--	Sale to authorized party
7	Still/Process bottom residues	Quantity not mentioned in EC	Quantity not mentioned in CTO	--	--	Sale to authorized party / CHWTSDF

- The total Hazardous Waste is not specified in the Environmental Clearance.
- The total Hazardous waste is drastically increasing with respect to the Consent to Operate quantities.

Technical Committee Deliberation: -

The project proposal was discussed based on presentation made and documents- revised NIPL Certificate, NIPL proforma and Power Point presentation submitted by the proponent. Product wise load calculation in terms of wastewater, Air Emissions & Hazardous Waste generations were discussed. Existing Consent to Operate, Environmental Clearance, No Increase in Pollution Load certificate issued by M/s. SGM (Enviro) Pvt. Ltd., No. Nil, Date: 18.06.2024 and product-mix proforma are taken on the record.

Committee after due deliberation noticed that:

- 1) Industry has proposed change in product mix by decreasing production capacity of 19 existing products & introducing 23 new products under the same category.
- 2) Industry proposes to decrease the production quantity of existing product from 720 MT/M to 324 MT/M and proposed new product under No increase pollution load with quantity 178 MT/M. The total production quantity will be 502 MT/M after NIPL, which is within the EC and consent limit.
- 3) After a change in product mix the Total process water consumption is proposed to be reduced by 28 CMD.
- 4) After a change in product mix Industry has proposed a decrease in the trade effluent by 2.0 CMD.

- 5) Average COD, BOD and TDS load after change in product mix is proposed to reduce by about 725 Kg/Day, 3.8 Kg/Day and 3003 Kg/Day respectively.
- 6) Industry has not proposed any changes in the steam requirements and Boiler configuration. The fuel consumption of the boiler for the changed production profile is proposed to remain the same. Industry has proposed new D.G Set (Standby) under change in product mix.
- 7) Industry proposes to install three new process vents double stage scrubbers in three separate production blocks for each manufacturing product. The industry has not submitted the comparison of the Air Pollution Load with respect to the additional parameters for process emissions in comparison to the existing pollution load.
- 8) The total Hazardous Waste is not specified in the Environmental Clearance; However, the total Hazardous waste is drastically increasing with respect to the Consent to Operate quantities after change in product mix.
- 9) The Technical Committee also noticed that the PP has not clearly justified the comparison of pollution load with respect to air (process emissions) and Hazardous Waste as per the Environmental Clearance, existing consent and Proposed changes in presentation and NIPL certificate.

Technical Committee Decision:

Technical Committee in view of above decided to defer the case and asked PP to reassess their pollution load, along with the NIPL certificate and was advised the PP to furnish above details in comparison with the Environmental Clearance, Consent to Operate and proposed changes under product mix, before the committee.



