PERIOD: **DECEMBER 2023 TO MAY 2024**

EC File No: SEAC 2011/CR -511/TC-2 dated 30th June 2012
Amendment in EC Letter : SEIAA-2019/CR-62/SEIAA Dated 25.04.2019

Submitted By

M/s. VN Creative Chemicals Private Limited

Plot No C-104, Mahad MIDC, Raigad, Maharashtra 402309

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VNC Creative Chemicals Pvt. Ltd. Mahad

1. PROJECT BACKGROUND

VN Creative Chemicals Private Limited formerly known as Vasundhara Rasayans Limited is a leading manufacturer and exporter of Antacids therapeutic category of Active Pharma Ingredients with annual capacity of about 1500 MT of powder or its equivalent products.

It started its operation in the year 1990 with an Antacid API facility offering product is paste, powder and micronized grade of powder. The plant is located on National Highway between Mumbai and Goa in an Industrial Zone called Mahad, which is about 170 KMS from Mumbai and about 125 KMS from the NSCI/JNPT Ports Mumbai.

In addition to the API manufacturing Vasundhara is also having an API intermediate plant to handle organic products with its state –of the –art specialized Friedel Craft reaction facility.

VNCCPL manufacturers organic products in paste, powder and micronized grade powder which is been successfully used to make liquid antacid formulations in place of conventional paste form of the products. The industry is operating at plot No.C-104, MIDC Mahad, District: Raigad-402309. Industry was in the business of inorganic chemical manufacturing, which does not require EC. In the year 2011 industry has decided to manufacture Iso-Butyl Aceto Phenone and it is organic chemical. Hence, in accordance with the EIA Notification 14th September 2006 and amendment thereof, the company has obtained Environmental Clearance from State Level Expert Appraisal Committee (SEIAA) vide letter No. SEAC 2011/CR-511/TC-2 dated 30th June 2012. **(Annexure:1-Copy of EC letter).** Further, after change in name of industry was obtained change in name in EC from Vasundhara Rasayans Limited to the VN Creative Chemicals Private Limited **(Annexure:2-Change in Name letter).** For EC product, i.e. Iso-Butyl Aceto Phenone, industry was obtained CTE from State Pollution Control Board vide consent No.BO/RO-Raigad/RO(P&P)/EIC-RD-1625-10/E/CC38 dated 04/03/2011. **(Annexure:3-1st CTE copy of organic product)** and CTO vide consent No. BO/AST/EIC.No.-RD-2624-14/Amalgamation/Gen-5824 dated 19/06/2014. (**Annexure:4-1st CTO as per EC).** CTO was later on amended under product mix for manufacturing two new additional product viz. Magaldrate and Sucralfate vide consent order No. BO/MPCB/AST/EIC.No,-RD-3016-15/A/Gen-4541 dated 01/04/2016. **(Annexure: 5-CTO copy under product mix** In the year 2018, industry was again obtained amendment in CTO under product mix for manufacturing of new products vide consent order No. format 1.0/BO/AST/UAN No.0000032995/0-1810001495 dated 26/10/2018 and valid till 30/10/2023 and Renewed the CTO as No. Format 1.0/CC/UAN No.0000173816/CR/2311000922 dated 10/11/2023 and valid till 30/06/2028. **(Annexure: 6- valid CTO for existing unit).**

The industry has acquired total area of 24000 m2 within the Mahad MIDC area.
Since the site is located in MIDC area with all the infrastructural requirements such as roads, electricity and water are supplied by MIDC.

2. INFORMATION SHEET

Monitoring the Implementation of Environmental Safeguards
Ministry of Environment & Forest

Western Region, Regional Office, Nagpur

MONITORING REPORT
PART – I
DATA SHEET

Sl. No.	Particulars		Details
1.	**Project type:**	:	Industry
2.	**Name of the Project**	:	Production of Iso Butyl Acetophenone
3.	**Clearance letter (s) / OM No. and date**	:	SEAC-2011/CR.511/TC-2 dated 30th June,2012.
4.	**Location** a) District (s)	:	Raigad.
	b) State (s)	:	Maharashtra
	c) Location latitude / longitude	:	**Point** / **Latitude** / **Longitude** A / 18°6'26.53''N / 73°28'59.99''E B / 18°6'26.61''N / 73°29'5.09''E C / 18°6'26.42''N / 73°29'0.32''E D / 18°6'26.60''N / 73°29'5.09''E
5.	**Address for Correspondence** a) Address of the Concerned Project Chief Engineer (with Pin code & Telephone / Telex / Fax Numbers)	:	Sanjeev Godse, Authorized Signatory, C/o S H Kelkar & Company Limited, LBS Marg, Mulund-West. Mumbai-400080. Tel-9604699906. Fax-022-21649766.
	b) Address of the Concerned Project Engineer / Manager (with Pin code & Telephone / Telex / Fax Numbers)		Sanjeev Godse, Authorized Signatory, C/o S H Kelkar & Company Limited, LBS Marg, Mulund-West. Mumbai-400080. Tel-9168448726 Fax-022-21649766. e-mail: vncccpl.mahad@keva.co.in.
6.	**Salient features** a) of the Project	:	**Project Spectrum**: Synthetic organic chemicals industry. **Total Plot Area**: 24,000.00 sq. m. **Project Resident Population size**: Floating population of individual tenant approx. As per EC/CTO: Present Scenario **Direct Employment**: 80 / 80

Water Demand	30 CMD Organic Unit Total Water-238 CMD.	30 CMD-Organic Unit Total Water-238 CMD.
Source of Water	MIDC	MIDC
Waste Water Generation	205 CMD	205 CMD
Sewage Treatment Plant (STP)	Treated in septic tank followed by soak pit.	Treated in septic tank followed by soak pit.
Effluent Treatment Plant (ETP)	225 CMD	225 CMD
Common Effluent Treatment Plant (CETP)	Out of 205 CMD of treated effluent 91 CMD of effluent is being recycled in the process and remaining 114 CMD shall be discharged into CETP for further treatment and disposal.	
Non-Hazardous Solid Waste generation	As per EC/CTO	Present Scenario
	Steel Scrap- 10 MT/M	Steel Scrap- 1.56 MT/M
	Wooden Scrap- 10 MT/M	Wooden Scrap- 0.00 MT/M
	Plastic Scrap- 10 MT/M	Plastic Scrap- 0.0 MT/M
Industrial Solid Waste generated		
Waste	As per EC/CTO	Present Scenario
37.3 Concentration or evaporator Residues	4.9 MT/D	0.280 MT/D
20.2 Spent Solvent	3.75 MT/M	0.00 MT/M
33.1 Empty barrels / Containers/liners contaminated with hazardous chemicals/Wastes	7500 Nos/M	157 Nos/M
35.3 Chemical Sludge from waste water treatment	200 kg/D	71.0 Kg/Day
28.1 Process Residue and waste	250 Kg/D	0.00 Kg/day
Power requirement	350 KVA	
Cost of the Project	As per EC	Present Scenario
	Rs 11.42 Cr	Rs 17.30 Cr

b) of the Environmental Management Plans

VN Creative Chemicals Pvt. Ltd. Mahad

Environmental and Social Monitoring –

Waste Water Treatment Plant

Industry is being categorized waste water as sewage & effluent. Total sewage generated from domestic activity is collected in septic tank and septic tank overflow will mixed with industrial effluent which will be primary treated in ETP of capacity 225 CMD. Out of 205 CMD of treated effluent 91 CMD shall be recycle/ reuse in the process and remaining 114 CMD is being discharged into CETP for further treatment & disposal by achieving consent standards.

Air Pollution

Stacks attached to boiler, DG set are the main air pollution source. Following measures are adopted within the industry

Sr.No.	Stack attached to	APC System	Height in Mtrs	Type of Fuel	Quantity & UoM	Pollutant	Std.
01	Boiler (6.3 TPH)	Stack	30	LSHS	1700 Kg/Day	TPM	50 Mg/Nm3
						SO2	--
02	Thermopac (10 Lac kcal/hr)	Stack	35	LSHS	119 kg/Hr	TPM	50 Mg/Nm3
						SO2	--
03	Spray Dryer	Stack	30	LSHS	75 kg/Hr	TPM	50 Mg/Nm3
						SO2	--
04	DG Set-I (500 KVA)	Acoustic Enclosure	11	HSD	112 Lit/Hr	TPM	50 Mg/Nm3
						SO2	17.92 Kg/D
05	DG Set-II (500 KVA)	Acoustic Enclosure	11	HSD	112 Lit/Hr	TPM	50 Mg/Nm3
						SO2	17.92 Kg/D
06	Scrubber for HCL Recovery C-501A	Scrubber	2.5	--	--	HCL	35ppm
07	Scrubber for HCL Recovery C-501B	Scrubber	3	--	--	HCL	35ppm
08	Scrubber for HCL Recovery C-501A	Scrubber	3	--	--	HCL	35ppm

Waste Management

Hazardous Waste Generation & Disposal

Category	Waste	Qty	Treatment/Disposal
28.1	Process Residue and Wastes	250 Kg/Day	CHWTSDF
35.3	Chemical sludge from waste water treatment	200 Kg/Day	CHWTSDF
20.2	Spent Solvent	3.75 MT/M	Sale to Authorized Party/CHWTSDF
33.1	Empty barrels/Containers/Liners contaminated with hazardous chemicals/wastes	7500 Nos/M	Sale to Authorized Party/CHWTSDF
37.3	Concentration or evaporation residues(MEE Salt)	4.9 MT/D	CHWTSDF
--	HCL (100% basis)	40 MT/M	Sale to Authorized Party/CHWTSDF
--	Intermediate Aluminium Chloride (PAC)	139 MT/M	Sale to Authorized Party/CHWTSDF

Non-Hazardous Waste Generation & Disposal

Sr.No.	Type of Solid Waste	Quantity	UoM	Disposal
01	Steel Scrap	10.00	MT/M	Sale to Authorized Party
02	Wooden Scrap	10.00	MT/M	
03	Plastic Scrap	10.00	MT/M	Sale to Authorized Recycler

Corporate Social Responsibility –

7.	**Breakup of the Project Area** a) Submergence area: forest & non forest	:	NA There is no forest area involved.
	b) Others		Total Plot Area:24,000.00 Sq. Meter Total BUA: 10850 Sq. M.
8.	**Breakup of the project affected population** with the enumeration of those losing Houses / Dwelling units only, Agricultural Land & Landless Laborers / Artisans: a) SC, ST / Adivasi	:	Not Applicable

	b) Others (please indicate whether these figures are based on any scientific and systematic survey carried out or only provisional figures, if a survey is carried out give details & year of survey)		
9 a)	**Financial Details:** Project cost as originally planned and subsequent revised estimates and the year of price reference	:	Existing -7.84 Cr, Proposed –Rs. 3.44 Cr. Total-Rs. 11.28 Cr. Revised total estimate of the project is in Rs 17.30 Cr.
b)	Allocation made for environmental management plans with item wise and year wise breakup	:	Capital Investment — Rs.5 Cr 0 & M Cost — Rs. 3.79 Cr/ Annum
c)	Benefit cost ratio/Internal rate of Return and the year of assessment	:	-
d)	Whether includes the cost of environmental management as shown in the above	:	Yes
e)	Actual expenditure incurred on the project so far	:	Revised total estimate of the project is Rs.17.30
f)	Actual expenditure incurred on the environmental management plans so far	:	Capital Investment — Rs.5.2 Cr
10	**Forest Land Requirement**		No Forest land is involved in the project.
a)	The status of approval for diversion of forest land for non-forestry use	:	NA
b)	The status of clearing felling	:	NA
c)	The status of compensatory afforestation, if any	:	NA
d)	Comments on the viability & sustainability of compensatory afforestation program in the light of actual field experience so far	:	NA

11	**The status of clear felling** in non-forest areas (such as submergence area or reservoir, approach roads.), if any with quantitative information required.	:	NA
12	**Status of construction** (Actual & /or planned)	:	Industry is in operational state as per schedule.
a)	Date of commencement (Actual & / or planned)	:	Actual : 02/07/2012
b)	Date of completion (Actual &/or planned)	:	Actual : 30/05/2014
13	Reasons for the delay if the project is yet to start	:	NA
14	**Dates of Site Visits**		
a)	The dates on which the project was monitored by the Regional Office on previous occasions, if any	:	12.06.2021
b)	Date of site visits for this monitoring report	:	30.04.2024

FOR VN CREATIVE CHEMICALS PVT LTD

AUTHORIZED SIGNATORY

VN Creative Chemicals Pvt. Ltd. Mahad

VN Creative Chemicals Pvt. Ltd. Mahad

CONDITION -WISE COMPLIANCE REPORT OF ENVIRONMENT CLEARNACE		
EC Order No.: F. No SEAC-2011/CR.511/TC-2 dated March 30th June ,2012 Amendment in EC Letter : SEIAA-2019/CR-62/SEIAA Dated 25.04.2019		
Sr.No.	**Conditions**	**Status of Compliance along with details**
General Conditions.		
i.	As the project is located at Mahad MIDC , Hon High Court/ CPCB directions particularly CETP and zero Liquid Discharge etc Prevailing if any should be complied while issuing consents for application and operate.	As per valid CTO Out of 205 CMD of treated effluent 91 CMD shall be recycle/ reuse in the process and remaining 114 CMD is being discharged into CETP for further treatment & disposal by achieving consent standards. Industry is having valid CETP discharge consent. **Annexure 7- MAHAD CETP Membership**
ii.	No Land Development/ Construction Work Preliminary or otherwise relating to the project shall be taken up without obtaining due clearance from respective authorities	Construction of project was stated after getting environmental clearance and consent from Maharashtra pollution control board i.e. 07/02/2012.
iii.	No additional land shall be used/required for any activity of the project without obtaining proper permission.	Noted. Existing land of 24000 Sq.Mt. is adequate for existing activity. Industry has planned expansion in additional land of 10000 sq.mt area.
iv.	For controlling fugitive natural dust, regular sprinkling of water & wind shields at appropriate distances in vulnerable areas of the plant shall be ensured.	It is already been compiled during construction phase

SPECIFIC CONDITIONS		
v.	Regular monitoring of air quality, Including SPM and SO2 levels both in work zone and ambient air shall be carried out in and around the power plant and the records shall be maintained. The location of monitoring stations and the frequency of monitoring shall be decided in consultation with MPCB and submit report accordingly to MPCB.	Noted. Air quality monitoring reports are attached as **an Annexure-8**
vi.	Necessary arrangement shall be made to adequate safety and ventilation arrangement in furnace area	There is no furnace requirement. Industry is having 6.3 TPH, LSHS/Briquette fired boiler. For proper combustion of fuel ID fan is provided to the boiler.
vii.	Proper housekeeping programs shall be implemented.	Noted. SOPS are defined for proper housekeeping. Daily log-sheets are maintained for housekeeping. All raw material as well as finished goods are stacked at designated area only.
viii.	In event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of use and shall not be restarted until the desired efficiency is achieved.	For failure and risk of operation HIRA system is designed and operation of the plant is being carried as per standard SOPS and HIRA.
ix.	A stack of adequate height based on DG set capacity shall be provided for control and spersion of pollutant from DG set. (If applicable).	11 meter stack height is provided to DG sets.
x.	A detailed scheme for rainwater harvesting shall be prepared and implemented to recharge ground water.	6 Recharge pits are constructed within plant premises for Rainwater Harvesting
xi.	Arrangement shall be made that effluent and storm water does not get mixed.	Separate effluent & storm water network is designed. Effluent is being treated in 225 CMD of ETP.
xii.	Periodic monitoring of ground water shall be	There is no abstraction or use of Ground water. Out of 205 CMD of treated

	undertaken and result analyzed to ascertain any change in the quality of water. Result shall be regularly submitted to the Maharashtra Pollution control Board.	effluent 91 CMD shall be recycle/ reuse in the process and remaining 114 CMD is being discharged into CETP for further treatment & disposal by achieving consent standards.
xiii.	Noise level shall be maintained as per Standards. For the people working in the high noise area, requisite personal protective equipment like earplugs etc. shall be provided.	There is no high noise prone area. Work zone noise is being monitored through spot noise level meter. Workers working around Reactor and CT area PPE's will provided.
xiv.	The overall noise level in and around the plant are shall be kept well within the standards by providing the noise control measures including acoustic hoods, silencers, enclosures, etc. on all sources of noise generation . The ambient noise level shall confirm to the standards prescribed. Under Environment (Protection) Act, 1986 Rules, 1989.	The ambient noise level within plant premises and around the industry is found within the permissible limits.
xv.	Green belt shall be developed & maintained around the plant periphery. Green Belt Development shall be carried out considering CPCB guidelines including selection of plant spices and in consultation with the local DFO/Agriculture Department.	As per MIDC DCR open area i.e.10% of the plot area is being converted into green belt. Within green area of 2400 Sq. Mt. 200 nos. of trees are planted.
xvi.	Adequate safety measures shall be provided to limit the risk zone within the plant boundary, in case of an accident. Leak detection devices shall also be installed at strategic places for early detection and warming.	Assembly points are defined and marked within plant premises in case of emergency. In addition to that alarm system and sensors are placed at working area to avoid catastrophic accident.
xvii.	Occupational health surveillance of the worker shall be done on a regular basis and record maintained as per Factories Act.	Health checkup for all workers are carried out as per schedule of company, in the month of November every year, As per compliance with Factory Act.
xviii.	The company shall make arrangement for protection of possible fire hazards during manufacturing process in the material handling.	Fire hazard control system is designed as per NAFA and detailed study is already being done. HIRA is designed and place as per SOP's. **Annexure-9: HIRA of the operation process.**

xix.	The project Authorities must strictly comply with the rules and regulation with regard to handling and disposal of hazardous wastes in accordance with the Hazardous wastes (Management and Handling) Rules, 2003 (amended). Authorization from the MPCB shall be obtained for collection /treatment/ storages/ disposal of hazardous wastes.	Industry is complying Hazardous wastes (Management and Handling) Rules, 2003 (amended). All generated Hazardous waste must dispose off through CHWTSDF & Authorized Vendor.

Category	Waste	Qty	Treatment /Disposal
28.1	Process Residue and Wastes	250 Kg/Day	CHWTSDF
35.3	Chemical sludge from waste water treatment	200 Kg/Day	CHWTSDF
20.2	Spent Solvent	3.75 MT/M	Sale to Authorized Party/CHWTSDF
33.1	Empty barrels/Containers/Liners contaminated with hazardous chemicals/wastes	7500 Nos/M	Sale to Authorized Party/CHWTSDF
37.3	Concentration or evaporation residues	4.9 MT/D	CHWTSDF
--	HCL (100% basis)	40 MT/M	Sale to Authorized Party/CHWTSDF – Internal Use
--	Intermediate Aluminium Chloride (PAC)	139 MT/M	Sale to Authorized Party/CHWTSDF – Internal Use

xx.	The company shall undertake following waste Minimization Measures:	
	➢ Meeting of the quantities of active ingredients to minimize the waste.	
	➢ Reuse of by-products from the process as raw materials or as raw material substitutes in the other process.	By-product is having good economic value hence it is directly sale into the market. Other end users used by-product as raw material
	➢ Maximizing Recoveries.	Solvent is recycled and reused **Annexure 10-** Solvent Recovery Details

	➢ Use of automated material transfer system to minimize spillage.	Solvent and high volatile raw material are fed with automatic controller.
Xxi	Regular mock drills for the on-site emergency management plan shall be carried out. Implementation of changes/improvements required. If any, in the on-site management plan shall be ensured	Noted and complying. Regular mock drills for on-site emergency preparedness is being carried out.
Xxii	A separate environment management cell with qualified staff shall be set up for implementation of the stipulated environmental safeguards.	Environmental Management Cell is established and it is operational under head of company MD It is under operational of Sanjeev Godse, Unit Head. **Annexure 11- EHS Cell.**
Xxiii	Separate fund shall be allocated for Implementation of environmental protection measures / EMP along with item-wise breaks-up. These cost shall be included as part of the project cost .The funds earmarked for the environment for the environment protection measures shall not be diverted for the other purposes and year wise expenditure should reported to the MPCB & this department.	**Annexure 12- Year wise EMP Budget**
Xxiv	The project management shall advertise at least in two local newspaper widely circulated in the region around the project, one of which shall be in the Marathi language oh the local concerned within seven days of issue of this letter, informing that the project has been accorded environmental clearance and copies of clearance letter are available with the Maharashtra Pollution Control Board and may also be seen at Website at http://ec.maharashtra.gov	
Xxv	Project management should submit half yearly compliance reports in respect of the stipulated prior environment clearance terms and condition in hard & soft copies to the MPCB &this department, on 1st June & 1st December of each calendar year.	Noted for compliance.

Xxvi	A copy of the clearance letter shall be sent by proponent to the concerned Municipal Corporation and the local NGO, if any, from whom suggestion/representation, if any were received processing the proposal. The clearance letter shall be also be put on the website of the company by the proponent.	Noted.
Xxvii	The proponent shall upload the status of compliance of the stipulated EC condition, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB .The criteria pollutant level namely; SPM, RSPM, 502, NOx (ambient level as well as stack emission) or critical sector parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	Noted for compliance **Annexure 8- Ambient Air Quality Reports** **Annexure 13-Stack Monitoring Reports** **Annexure 14- ETP Treated Water Analysis Reports**
Xxviii	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC condition including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF,the respective Zonal Office of CPCB and the SPCB	Noted for compliance
Xxix	The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as Prescribed under the environment (protection)Rules, 1986,as amended subsequently ,shall also be put on the website of the company along with the status of the compliance of EC condition and shall also be sent to the respective Regional Offices of MoEF by e-mail.	**Annexure 15- FORM-V for FY 2022-23.**
4	The environmental clearance is being issued without prejudice to the action initiated under EP act or any court case pending in the court of law and it does not mean that project	Noted & Agreed.

	proponent has not violated any environmental laws in the past and whatever decision under EP act or of the Hon'ble court will be binding on the project proponent. Hence this clearance does not give immunity to the project proponent in the case filed against him, if any or action initiated under EP act.	
5	The environment department reserves the right to add any stringent condition or to revoke the clearance if conditions stipulated are not implemented to the satisfaction of the department or for that matter, for any other administrative reason.	Noted.
6	**Validity of Environmental Clearance:** The environmental clearance accorded shall be valid for a period of 5 years to start of production operations.	Noted. Industry construction was started dated 02/07/2012 and completed dated 30/05/2014. Industry obtained CTO from MPCB dated 19/06/2014.
7	In case of any deviation or alteration in the project proposed from those submitted to this department for clearance, a fresh reference should be made to the department to assess the adequacy of the condition(S) imposed and to incorporate additional environmental protection measures required, if any.	Noted.
8	The above stipulations would be enforced among others under the water (prevention and control of pollution) act, 1974, the air (prevention and control of pollution) act, 1981. The environment (protection) act, 1986 and rules there under, hazardous wastes (management and handling) rules, 1986 and its amendments, the public liability insurance act, 1991 and its amendments.	Noted.
9	Any appeal against this environmental clearance shall lie with the National Green Tribunal, Van Vigyan Bhawan, Sec-5, R.K. Puram, New Delhi — 110022, if preferred, within 30 days as prescribed under section 35 of the National Green Tribunal Act 2010.	Noted.