

सत्यमेव जयते

By Speed Post/Online

F. No. J-11011/63/2009- IA II(I)
Government of India
Ministry of Environment, Forest and Climate Change
Impact Assessment Division

Indira Paryavaran Bhawan
Jorbagh Road, New Delhi - 110003

Dated: 17th August, 2020

To

M/s Insecticides India Limited

Plot No. E-442, 443 & 444
RIICO Industrial Area, Chopanki
Taluka Bhiwadi, District Alwar
Rajasthan - 301 707

Email: mukeshiilindia@gmail.com

Sub: Expansion of Pesticides Technical Products Manufacturing Unit from 1800 TPA to 9350 TPA at Plot No. E-442, 443 & 444, RIICO Industrial Area, Chopanki, Taluka Bhiwadi, District Alwar, Rajasthan by M/s Insecticides India Limited - Environmental Clearance - regarding

Sir,

This has reference to your proposal No. IA/RJ/IND2/116690/2019 dated 30th September 2019, submitting the EIA/EMP report on the above subject matter.

2. The Ministry of Environment, Forest and Climate Change has examined the proposal for environmental clearance to the project for Expansion of Pesticides Technical Products Manufacturing Unit from 1800 TPA to 9350 TPA by M/s Insecticides India Limited in an area of 11,958 sqm located at Plot No. E-442, 443 & 444, RIICO Industrial Area, Chopanki, Taluka Bhiwadi, District Alwar, Rajasthan.

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

S. No.	Product	Existing	Additional	Total
		(MTPA)		
A. PESTICIDE TECHNICAL				
1.	Phenoxy Herbicides	20	280	300
	Quizalofop			
	2,4-D Ethyl Ester			
	2,4-D sodium salt			
	Clodinafop propargyl			
2.	Imidazolinone Herbicide	50	0	50
	Imazethapyr			
3.	Sulfonyl Urea Herbicides	20	380	400
	Metsulfuron methyl			
	Sulfosulfuron			
	Tribenuron methyl			
	Flazasulfuron			
	Iodosulfuron			
	Nicosulfuron			
	Rimsulfuron			
4.	Organochlorine Herbicides	200	0	200
	Butachlor			

	Pretilachlor			
5.	Other Herbicides	600	200	800
	Oxyfluorfen			
	Paraquate			
	Diclofop methyl			
	Diflufenican			
	Sulcotrione			
	Benfuresate			
	Glufosinate ammonium			
	Penoxsulam			
	Pinoxaden			
	Propanil			
	Tembotrione			
6.	Carbamate Insecticide	10	90	100
	Thiodicarb			
7.	Neo Nicotinoid Insecticides	100	2900	3000
	Acetamiprid			
	Imidacloprid			
	Thiacloprid			
	Thiamethoxam			
	Dinotefuran			
	Clothianidin			
	Imidaclothiz			
8.	Organophosphorus Insecticides	300	0	300
	Chlorpyrifos			
9.	Pyrethroid Insecticides	150	2850	3000
	Allethrin			
	Alpha cypermethrin			
	Cyfluthrin			
	Cypermethrin			
	Delta cypermethrin			
	d-transallethrin			
	Lambda cyhalothrin			
	Permethrin			
	Prallethrin			
	Transfluthrin			
	Bifenthrin			
	Metofluthrin			
10.	Other Insecticides	100	200	300
	Fipronil			
	Buprofezin			
	Cartap hydrochloride			
	Metalaxyl			
	Novaluron			
	Ethiprole			
	Thiocyclam hydrogen oxalate			
	Pymetrozine			
	Fenpyroximate			
	Spirotetramat			
	Flonicamid			
	Flubendiamide			
	Indoxacarb			
11.	Conazole Fungicides	75	225	300

	Difenoconazole			
	Hexaconazole			
	Ipconazole			
	Paclobutrazol			
	Propiconazole			
	Tebuconazole			
	Tricyclazole			
	Probenazole			
	Prothioconazole			
	Epoxiconazole			
12.	Other Fungicides	75	225	300
	Thiophanate methyl			
	Pyraclostrobin			
	Cyazofamid			
13.	Fermentation Technology	100	200	300
	Abamectin			
	Azoxystrobin			
	Picoxystrobin			
	Emamectin benzoate			
Total		1800	7550	9350
B. PESTICIDE FORMULATIONS (KL/MT)				
1.	Pesticide formulation Bulk	1500	0	1500
2..	Emulsifier formulation	500	0	500
3.	Granule formulations	7500	0	7500
4.	Liquid formulations	6000	0	6000
5.	Powder formulations	4500	0	4500
6.	R&D Unit	1 (Service)	0	1 (Service)
Total		20,000	0	20,000

4. The existing land area is 11,958 sqm and no additional land is required for the proposed expansion. Industry has developed green belt in an area of 4000 sqm and shall develop another 784 sqm, covering 40% of total project area. The estimated project cost is Rs. 45.67 crores including existing investment of Rs. 29.13 crores i.e. the cost of project towards this expansion project is Rs. 16.54 crore. Total capital cost earmarked towards environmental pollution control measures is Rs. 9.43 crores and the recurring cost (O&M) will be about Rs. 6 crores per annum. The project will provide employment for 160 persons directly & indirect.

5. There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors, rivers etc. within 10 km distance.

6. Total water requirement is estimated to be 188 cum/day, which includes fresh water requirement of 62 cum/day, proposed to be met from RIICO Water supply. Total waste water generation will be 136 cum/day (Industrial: 129 cum/day + Domestic: 7 cum/day). Out of 129 cum/day industrial effluent, effluent from processes, scrubber and lab (49 cum/day) will be sent to stripper and 47.75 cum/day to MEE and MEE condensate (40 cum/day) will be sent to ETP for further treatment. Total effluent (127 cum/day) from septic tank, utilities, washing and MEE condensate will be sent to ETP and 126 cum/day final treated effluent will be recycled for industrial operations. Domestic wastewater (7 cum/day) will be sent to septic tank and then mixed with industrial effluent in ETP for further treatment. There will be no discharge of treated/untreated waste water from the unit, and thus ensuring Zero Liquid Discharge.

Power requirement after expansion will be 860 KW and will be met from JVVNL. Existing unit has one DG set of 380 KVA, additionally two DG sets of 500 KVA & 125

KVA capacities respectively shall be used as standby during power failure. Stack (height 6, 7 and 5.5 m) will be provided as per CPCB norms. Existing unit has 2 TPH Wood/Briquettes fired Boiler. Additionally, 4 TPH Briquettes fired Boiler will be installed. Multi cyclone separator with Bag filter & Scrubber with a stack of height of 30 m will be installed for controlling the particulate emissions within statutory limits.

The VOC losses will be controlled to less than 0.5 % going in the environment, by installing primary condenser, secondary condenser, VOC trap condenser, reducing temperature from -10 °C to -35 °C and also adopting LDAR system. The continuous online monitoring system will be installed for incinerator and connected to CPCB server within next 6 months.

7. The project/activities are covered under category A of item 5(b) 'Pesticides industry and Pesticide specific intermediates' of the Schedule to the Environment Impact Assessment Notification, 2006, and requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

8. The Standard Terms of References (ToR) was issued by the Ministry vide letter dated 18th February, 2019. Public hearing is exempted in accordance with the Ministry's OM dated 27th April 2018, as the project site is located inside the notified industrial area.

9. The Ministry has earlier issued environmental clearance vide letter dated 29th April, 2009 to the project for Expansion of pesticide manufacturing unit from 400 TPA to 1800 TPA in favour of M/s Insecticides India Limited. The Ministry's Regional Office at Lucknow has forwarded the certified report on 5th July, 2019 on the compliance status of the EC conditions, after conducting site visit on 29th May, 2019. The Committee in its meeting held on 21-23 January, 2020 has considered the report from the Central Pollution Control Board issued vide letter dated 20th January, 2020, after conducting site visit on 11-12 January, 2020, and was found to be satisfactory. The Ministry, vide letter dated 22nd April, 2020 has also requested Rajasthan SPCB for factual report on the matter. In this context, Rajasthan State Pollution Control Board, vide letter dated 22nd July, 2020, has emailed the copy of Report and the same was uploaded in PARIVESH portal on 28th July, 2020. It was reported that the unit is in operation in compliance of the environmental clearance and Consent to Operate granted to the project. It has been informed that the directions of Hon'ble NGT are also complied by the unit.

10. The proposal was considered by the Expert Appraisal Committee (Industry-2) in its meetings held on 20-22 November, 2019 and 21-23 January, 2020 in the Ministry, wherein the project proponent and their consultant M/s Aqua-Air Environmental Engineers Pvt Ltd presented the EIA/EMP report as per the ToR. The Committee found the EIA/EMP report complying with the ToR and recommended the project for grant of environmental clearance.

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

The EAC noted that the Project Proponent has given undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP report. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the project proponent.

The Committee noted that the EIA/EMP report is in compliance of the ToR issued for the project, reflecting the present environmental concerns and the projected

scenario for all the environmental components. The Committee has found the baseline data and incremental GLC due to the proposed project within NAAQ standards. The Committee has also deliberated on the CER plan and found to be addressing the issues in the study area. Additional information submitted by the project proponent to be satisfactory and addressing the concerns of the Committee. The EAC has deliberated the proposal and has made due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC have found the proposal in order and have recommended for grant of Environmental Clearance.

12. The Ministry has received reports from the Central Pollution Control Board vide letter dated 20th January, 2020, after conducting site visit on 11-12 January, 2020 and from the Rajasthan State Pollution Control Board vide letter dated 22nd July, 2020, after conducting site visit on 5th June, 2020 related to the project. It was reported that the unit is in operation in compliance of the environmental clearance and Consent to Operate granted to the project. It has been informed that the directions of Hon'ble NGT are also complied by the unit.

13. The proposal has been further examined in the Ministry and it is observed that EAC has recommended Rs. 1 crore towards the Corporate Environment Responsibility (CER) on expansion cost of Rs. 16.54 crore which should be maximum of Rs. 33.08 Lakhs @ 2% of the cost for expansion project as per the Ministry's Office Memorandum No. 22-65/2017-IA.III on CER dated 01.05.2018 & Ministry's OM no. Q-16017/38/2018-CPA dated 24th October, 2019 on Critically Polluted Areas. Accordingly, the competent authority in the Ministry has approved the CER cost of Rs. 33.08 Lakhs. The CER plan shall be completed within two years and activities as proposed like infrastructure for schools, toilet, green school campaign, medical facilities for the villages, drinking water etc. shall be implemented.

14. The environmental clearance granted to the project/activity is strictly under the provisions of the EIA Notification 2006 and its amendments. It does not tantamount/construe to approvals/consent/ permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The project proponent shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

15. Based on the proposal submitted by the project proponent and recommendations of the EAC (Industry-2), Ministry of Environment, Forest and Climate change hereby accords **Environmental clearance to the project for Expansion of Pesticides Technical Products Manufacturing Unit from 1800 TPA to 9350 TPA by M/s Insecticides India Limited at Plot No. E-442, 443 & 444, RIICO Industrial Area, Chopanki, Taluka Bhiwadi, District Alwar, Rajasthan**, under the provisions of the EIA Notification, 2006, subject to the compliance of terms and conditions as under:-

- (i) The SPCB shall follow the mechanism/protocol issued by the Ministry vide letter no. Q-16017/38/2018-CPA dated 24th October, 2019 and forwarded by Central Pollution Control Board vide letter dated 25th October, 2019 to the SPCB's, while issuing the CTE/CTO for the project, for improvement of environmental quality in the area.
- (ii) Zero Liquid Discharge shall be ensured including existing facility and the proposed expansion facility and no waste/treated water shall be discharged outside the premises.

- (iii) VOC losses shall be less than 0.5 % and controlled by installing primary condenser, secondary condenser, VOC trap condenser, reducing temperature from -10 °C to -35 °C and also adopting LDAR system.
- (iv) Continuous online monitoring system shall be installed for incinerator and connected to CPCB server within 6 months.
- (v) No pesticides/chemicals banned by the Ministry of Agriculture and Farmers Welfare, or having LD₅₀<100 mg/kg shall be produced. Also, no raw material/solvent prohibited by the concerned regulatory authorities from time to time, shall be used for production of pesticides.
- (vi) Solvent management shall be carried out as follows:
 - (a) Reactor shall be connected to chilled brine condenser system.
 - (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages.
 - (c) The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.
 - (d) Solvents shall be stored in a separate space specified with all safety measures.
 - (e) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.
 - (f) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.
 - (g) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (vii) Total fresh water requirement shall not exceed 62 cum/day and will be met from RIICO Water supply. Prior permission in this regard shall be obtained from the concerned regulatory authority.
- (viii) Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system
- (ix) Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm, and solvent transfer through pumps.
- (x) Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.
- (xi) The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time.
- (xii) The company shall undertake waste minimization measures as below:-
 - (a) Metering and control of quantities of active ingredients to minimize waste.

- (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
 - (c) Use of automated filling to minimize spillage.
 - (d) Use of Close Feed system into batch reactors.
 - (e) Venting equipment through vapour recovery system.
 - (f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.
- (xiii) The green belt of at least 5-10 m width shall be developed in nearly 40% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department. In addition, the project proponent shall develop greenbelt outside the plant premises also such as avenue plantation, plantation in vacant areas, social forestry etc.
- (xiv) As per Ministry's OM No. 22-65/2017-IA.III dated 1st May 2018 (CER) and Ministry's OM no. Q-16017/38/2018-CPA dated 24th October, 2019 (Critically Polluted Areas), an amount equivalent to 2% of proposed capital cost for expansion i.e. Rs. 33.08 Lakhs shall be allocated for Corporate Environment Responsibility (CER). The CER plan shall be completed within two years and activities as proposed like infrastructure for schools, toilet, green school campaign, medical facilities for the villages, drinking water etc shall be implemented.
- (xv) Safety and visual reality training shall be provided to employees.
- (xvi) The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.
- (xvii) Occupational health surveillance of the workers shall be done on a regular basis and records maintained.
- (xviii) Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
- (xix) Mitigating measures suggested during process safety and risk assessment studies shall be undertaken accordingly.

15.1 The grant of environmental clearance is further subject to compliance of other general conditions as under:-

- (i) No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.

- (ii) The energy source for lighting purpose shall be preferably LED based, or advance having preference in energy conservation and environment betterment.
- (iii) The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one station each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.
- (iv) The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be followed.
- (v) The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
- (vi) The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and to utilize the same for process requirements.
- (vii) Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
- (viii) The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented.
- (ix) The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
- (x) A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.
- (xi) The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
- (xii) A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, ZillaParishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
- (xiii) The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.

- (xiv) The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by e-mail.
- (xv) The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at <https://parivesh.nic.in/>. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.
- (xvi) The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.
- (xvii) This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.


16. The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental clearance, if implementation of any of the above conditions is not found satisfactory.

17. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.

18. Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

19. The above conditions shall be enforced, *inter-alia* under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.

20. This issues with approval of the competent authority.


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

Copy to:-

1. The Deputy DGF (C), MoEF&CC Regional Office (CZ), Kendriya Bhawan, 5th Floor, Sector H, Aliganj, Lucknow - 226 020

2. The Secretary, Environment Department, Government of Rajasthan, Jaipur
3. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 110032
4. The Member Secretary, Rajasthan Pollution Control Board, 4, Jhalana Institutional Area, Jhalana Doongri, Jaipur (Rajasthan) - 302 004
5. The District Collector, District Alwar (Rajasthan)
6. Guard File/Monitoring File/Parivesh Portal/Website/Record File

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