Sai
make it better together

13th Jul, 2020

To,
The Chief Conservator of Forests (C),
Ministry of Environment, Forest and Climate Change,
Regional Office (SZ),
Kendriya Sadan, 4th Floor, E&F Wings,
17th Main Road, Koramangala 2d Block,
Bengaluru – 560034.

Sub: - Submission of Six months compliance report.
Ref: - Environment Clearance No. SEIAA 47 IND 2016, Dated: 28-Apr-2017.

Dear Sir,

With reference to the above cited, please find enclosed herewith find Six months compliance report for the period of January-2020 to June-2020.

Enclosed Copy: 1. Copy of EC.
2. Copy of the compliance status.
3. List of Annexures.

Kindly acknowledge the receipt.

Thanking you.

Yours faithfully,

For Sai Life Sciences Limited.

Authorized Signatory.

CC TO: 1. The Karnataka State Pollution Control Board, Plot No. 42(B -2), Naubad Industrial Area, Bidar– 585 403.
2. The Member secretary, KSPCB, Parisara Bhavan, Bengaluru (Karnataka).
3. The Member Secretary, SEIAA Karnataka (Ecology and Environment) Dept of Forest ecology and environment, Government of Karnataka, Room No. 709. 7th floor, 4th Gate, MS Building, Bengaluru – 56001.

Compliance report for the period from Jan-2020 to Jun -2020 for Environment Clearance No. SEIAA 47 IND 2016,Dtd,28-Apr-2017. Accorded by State level Environment impact Assessment Authority -Karnataka (Constituted by MOEF,Government of India)

**PART A : SPECIFIC CONDITIONS :**

| S.NO | Specific Conditions | Compliance status | Remarks |
|---|---|---|---|
| 1 | National Emission Standards for Organic Manufacturing Industry issued by the Ministry vide G.S.R.608(E) dated 21st July,2010 and amended time to time shall be followed by the unit. | Regular monitoring of Ambient air quality,process emission and treated effluent are being carried out.<br>The monitoring report are being submitted to the KSPCB regional office-Bidar regular intervals. | Complied. |
| 2 | The total effluent generation shall not exceed 140.5 KLD. High TDS effluent shall be treated in Stripper followed by Multiple Effect Evaporator of capacity 120KLD & Agitated Thin Film Dryer further treated in Biological ETP of capacity 150KLD followed by RO. Low TDS effluent shall be treated in Biological Effluent Treatment Plant. Domestic waste treated in Proposed STP of capacity 30. | Our industry is maintained ZLD facility<br>A). We are having High TDS effleuent treatment facility which consists of Stripper,MEE and ATFD .<br>B). We are having Low TDS effluent treatment facility which consists of Primary & Biological treatment and RO plant.<br>C). We are having domestic effluent treatment facility 30 KLD STP . **(Refer to annexure-1)** | Complied. |
| 3 | Effluent Treatment Plant shall ensure to prevent ground water contamination due to leakage from unlined tanks. | A). Impervious acid proof lining at raw effluent collection tanks.<br>B). Hard flooring provided for entire Effluent treatment plant.<br>C). Acid resistance impervious lining provided for hazard areas.<br>D). Secondary containment provided for ETP operational equipment's. **(Refer to annexure-2)** | Complied |
| 4 | Total water requirement from KIADB water supply shall not exceed 199.8 KLD and prior permission shall be obtained from the concerned authority .No ground water shall be used. | Noted.<br>The average fresh water consumption is well within the limits. As the quality of water supplied by KIADB is not suitable for the manufacturing of life saving medicines, open wells are used as a source of fresh water. Letters submitted to KSPCB and KIADB. **(Ref. Annexure-3)** | Complied |



S.M. LIFE SCIENCES LTD. BIDAR UNIT-IV

| | | | |
|---|---|---|---|
| 5 | The process emission from the boiler shall be dispersed through stack of adequate height as per CPCB/KSPCB Standards. The gaseous emissions from the DG set shall be dispersed through stack height as per CPCB standards shall be provided .Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution. | Ensured adequate stack heights for boilers and DG Sets. All DG sets are provided with acoustic enclosures.<br>Photographs & Noise level reports attached.<br>**(Refer to annexure-4)** | Complied. |
| 6 | Ambient air quality data shall be collected as per NAAQS standards notified by the Ministry vide G.S.R. No.826(E)dated 16th september,2009.The levels of PM10, PM2.5 ,SO2,NOx,CO,VOC and HCL shall be monitored in the ambient air and emissions from the stacks and displayed at a convenient location near the main gate of the company and at important public places. The company shall upload the results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MoEF, Bangalore, SEIAA, Karnataka, the respective Zonal office of CPCB and the KSPCB. | Ambient Air quality are monitored through approved laboratories and reports are submitted to Regional office on monthly basis and displayed at the main gate .Uploaded in company website and being updated half -Yearly.<br>**(Refer to Annexure-5)** | Complied. |
| 7 | The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall update the same periodically. It shall simultaneously be sent to the Regional office of MoEF, Bangalore , SEIAA,karnataka, the respective Zonal office of CPCB and the KSPCB. The levels of PM10, PM2.5, SO2,NOx, CO,VOC(ambient levels)and emissions from the stacks shall be monitored and displayed at a convenient location near the main gate of the company and at important public places. | A). Compliance status to the condition stipulated in Environment clearance is displayed in company website and will be updated half -Yearly.<br>B). Ambient Air quality and stack emissions are monitored through approved laboratories and reports are submitted to Regional office on monthly basis.<br>C). Stack emission reports displayed at main gate.<br>**(Refer to Annexure-6)** | Complied. |



SAI LIFE SCIENCES LTD. BIDAR UNIT-IV

| | | | |
|---|---|---|---|
| 8 | The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous and other wastes (Management and Transboundary Movement) Rules,2016 for management of hazardous wastes and prior permission from KSPCB shall be obtained for disposal of solid/hazardous waste to the TSDF. The concerned company shall undertake measure for fire fighting in case of emergency. | Noted and we shall obtain the same at the earliest. We have a dedicated Fire hydrant system and having 2 hours fire fighting provision with dedicated fire hydrant reservoir of 550 KL capacity. Automatic fire detection cum alarm system is available. Manual Call Points are available at various strategic locations. Fire alarm panels are monitored by Security round the clock. Critical areas are provided with automatic fire suppression type fire extinguishers. Entire site is covered with dedicated fire hydrant system which is kept in 'auto' mode. Electrical pump, Diesel pump and Jockey pump are made available in fire pump house which are hooked to a dedicated fire water reservoir. Aqueous Film Forming Foam (AFFF) solution is maintained at strategic locations. Portable fire extinguishers are placed at strategic locations across the site. Fire Extinguishers of different types like Dry Powder, Carbon dioxide, and Mechanical Foam are available. We also having 60 Members of Emergency Response Team (ERT Members) and they have undergone special training from the Fire department. We have engaged one retired District Fire officer for the Fire Fighting training and he visits the site once in 2 days and conducts the training to all the ERT members. **(Refer to Annexure - 7)** | Complied. |
| 9 | In plant control measures for checking fugitive emission from all the vulnerable sources shall be provided. Fugitive emission shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust Suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. Fugitive emissions in the | Adequate control measure are available for minimising the fugitive emission from all the vulnerable sources.<br>A). we have installed Powder transfer system (PTS) ,Glove box and drum Containment system(DCS).These advanced containment systems protect the environment by limiting the concentration of pollutants in ambient air.<br>B). All our critical manufacturing operation are carried out through closed system and the reactors also | Complied. |

| | | | |
|---|---|---|---|
| | work zone environment, product, raw materials storage area etc. shall be regularly monitored .The emissions shall conform to the limits stipulated by the KSPCB. | are equipped with primary and secondary condensers with RT water or +5℃ chilled water utility to prevent emission of Vocs.<br>C). We also installed vent condenser and for storage tank,which stores low boiling solvent to minimize vaporization loses during storage.<br>D). We have installed water based dust suppression system in our closed coal yard to suppress any from of dust generation during unloading of coal from truck as well loading of coal to boiler.<br>E). Our Boiler works on fluidized bed technology for effective combustion and has pulsating fibber glass filters for efficient emission control (SPM< 100 mg/Nm$^{3)}$.<br>F). VOC Monitoring is being done and reports are submitted on monthly basis to Regional Office.<br>**(Refer to Annexure -8)** | |
| 10 | Hazardous chemicals shall be stored in tanks in the tank farms, drums ,carboys etc. Flame arresters shall be provided on tank farm .Solvent transfer system shall be by pumps. | Solvent storage tank farm is equipped with Nitrogen padding facility. Vents are equipped with flame arrestor, breather valve and Back pressure relief valves. Nitrogen blanketing system, earth rite system are provided in tank farm area. Foam flooding automatic system is provided in drum shed.<br>**(Refer to annexure -9)** | Complied. |
| **11. The company shall undertake following Waste Minimization measures :** | | | |
| a | Metering & Control of Quantities of active ingredients to minimize waste | Waste minimization efforts are on-going and close monitoring of waste generation is in place | Complied |
| b | Reuse of by-products from the process as raw materials or as raw materials substitutes in other processes. | By- product recovered are recycled by selling them to actual users.<br>**(Refer to annexure -10)** | Complied |

| | | | |
|---|---|---|---|
| c | Use of automated filling to minimize spillage. | 1).Liquids are transferred from centralized tank farm area to process plants through dedicated closed pipelines and suitable MOC through an automated system.<br><br>2).Level controllers / Indicators are available in the reactors and storage tanks .<br>**(Refer to annexure -11)** | Complied |
| d | Use of close feed system into batch reactors | All powders are transferred through Powder Transfer System (PTS) and glove boxes. And Liquids are transferred by applying vacuum or closed charging by pumps.<br>**(Refer to annexure -12)** | Complied. |
| e | Venting equipment through vapour recovery system. | Heat exchangers are provided wherever necessary. Based on the need secondary /vent condensers are also provided with brine /chilled water cooling circulation system.<br>**(Refer to annexure -13)** | Complied. |
| f | Use of high pressure hoses for equipment cleaning to reduce waste water generation. | CIP system and high pressure water jet machines are in place to reduce the waste water generation. Attached the photographs of CIP system.<br>**(Refer to annexure -14)** | Complied. |
| **12. For control of fugitive emissions, following steps shall be followed** | | | |
| a | Closed handling system shall be provided for chemicals. | Chemicals are transferred through closed pipelines and processed in closed equipment. Entire solvent dispensing is done through PLC system from a remote location under strictly closed.<br>**(Refer to annexure -15)** | Complied |
| b | Reflux condenser shall be provide over reactor | All reactors are equipped with heat exchangers. Based on the need secondary condensers are also provided with brine /chilled water cooling circulation system .<br>**(Refer to annexure -16)** | Complied |

| | | | |
|---|---|---|---|
| c | System of leak detection and repair of pump/pipeline based on preventive maintenance. | Vapour detection systems are installed in stores. Preventive maintenance is extended to all equipment including pollution control equipment and the same is performed by qualified team of Maintenance. Attached the Critical list of Preventive Maintenance. **(Refer to Annexure - 17)** | Complied |
| d | The acid shall be taken from storage tanks to reactors through closed pipelines. Storage tanks shall be vented through trap receiver and condenser operated on chilled water. | Acids are transferred through closed pipe lines. Equipment are connected to scrubbers for necessary treatment of emissions. Photographs of scrubbers are attached. **(Refer to annexure – 18 )** | Complied |
| e | Cathodic protection shall be provided to the underground solvent storage tank. | Double earthing systems are connected to all the solvent storage tanks. **(Refer to annexure – 19 )** | Complied |
| **13. Solvent management shall be carried out as follows:** | | | |
| a | Solvent used in the process shall be completely recovered and reused. | 1). Solvent used in the process are recovered and it is reused based on its quality and in compliance with GMP norms.<br>2). In-house Solvent Recovery System provided. | Complied. |
| b | Efforts are to be made to recover inorganic salts. | Efforts are in place. | On-going and close monitoring |
| c | Reactor shall be connected to chilled brine condenser system | All reactors are equipped with chilled water and chilled brine circulation systems. | Complied |
| d | Reactor and solvent handling pump shall have mechanical seals to prevent leakages. | All pumps are having double mechanical seals. | Complied. |

| | | | |
|---|---|---|---|
| e | The condenser shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery. | Condensers are designed for sufficient heat transfer (HTA)area and residence time. Latest spiral condensers are installed for better solvent recovery. | Complied |
| f | Solvent shall be stored in a separate space specified with all safety measures. | Dedicated storage tanks equipped with Foam flooding system available and storage area has flame proof electrical fixtures.<br>Solvent storage tank farm is equipped with Nitrogen padding facility. Vents are equipped with flame arrestor, breather valve and Back pressure relief valves.<br>**(Refer to annexure – 20 )** | Complied. |
| g | Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done | Earth rite system installed in solvent tank farm area to prevent static hazards.<br>Double body earthing is followed in entire plant by default. Earthing continuity checks are performed at periodical intervals<br>**(Refer to annexure – 19 )** | Complied |
| h | Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses | Solvent storage tank farm is equipped with pressure control valve, flame arrestor, breather valve to minimize vent losses. All equipment provided in process plants and storage areas confirm to FLP type.<br>**(Refer to annexure – 21 )** | Complied. |
| i | Fugitive emissions in the work zone environment, product,raw materials storage area etc.shall be regularly monitored. The emissions shall conform to the limits imposed by KSPCB. | Regular work place monitoring's are being carried out through the VOC meter and same is submitted to the KSPCB office monthly.<br>**(Refer to annexure – 22 )** | Complied. |
| 14 | No effluent shall be discharged outside the factory premises and ''Zero'' discharge concept shall be adopted | We have a Zero Liquid Discharge (ZLD) unit comprising of Biological ETP, Multiple Effect Evaporation system (MEE) and Reverse Osmosis (RO) Unit. Permeate from RO is used in cooling tower make up. Reports are submitting to the Board regularly for the existing plant. | Complied. |

| | | | |
|---|---|---|---|
| 15 | Multi-cyclone followed by bag filter shall be provided to boilers to control particulate emissions within 100 mg/Nm3. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/KSPCB guidelines. | Cyclone separator installed followed by the bag filter and stack height is in line with norms. Attached the stack heights and on-line stack emission report. **(Refer to annexure – 23 )** | Complied. |
| 16 | Two stage chilled water/caustic scrubber shall be provided to process vents to control the HCL.Two stage scrubbers with caustic lye media solution shall be provided to process vents to control SO2.The scrubbing media shall be sent to effluent treatment plant(ETP) for Treatment. Efficiency of Scrubber regularly and maintained properly. At no time, the emission levels shall go beyond the prescribed standards. | A). Emission from process is passed through two stage condensers with water ,chilled water /brine as cooling media to recovered solvents followed by scrubber with appropriate scrubbing media to control HCL / $H_2S$ / $SO_2$.<br>B). The gaseous emission at the outlet of scrubber are being monitored and are well below the stipulated standard. **(Refer to annexure – 24 )** | Complied. |
| 17 | As proposed waste generated area Waste oil shall be collected in MS drum and Hazardous waste storage area and sent to recyclers. Spent catalyst shall be collected in carboys and stored in spent solvent storage area and sent to recyclers. Spent carbon shall be collected in polythene bag and stored in Hazardous waste storage area and sent to cement industry for co-processing. Discarded MS containers, Discarded HDPE used liners, Inorganic Lithium,Dicobalt shall be collected in polythene bag and stored in Hazardous waste storage area and sent to recyclers. Organic residues from solvent distillation, Inorganic salts from MEE,Inorganic salts from procerss,Discarded chemical/lab waste,ETP Sludge/Chemical sludge from process,shall be collected in polythene bag and stored in Hazardous waste storage area and sent to TSDF/sent to cement plant. | A). Hazardous wastes are being disposed to authorized recyclers, re-processors.<br>B). We have a dedicated Hazardous waste shed for all the waste and collected in HDPE leak proof bags. **(Refer to annexure – 25 )** | Complied |

| | | | |
|---|---|---|---|
| 18 | Boiler ash shall be stored separately as per CPCB guidelines so that it shall not adversely affect the air quality, becoming air borne by wind or water regime during rainy season by following along with the storm water. Direct exposure of workers to fly ash & dust shall be avoided. | A. Boiler coal storage in closed shed and provided water mist to control dust dispersion into environment .<br>B). Closed conveyor system to handle the coal loading activity.<br>C). Boiler operators are provided with dust masks.<br>**(Refer to annexure – 26 )** | Complied |
| 19 | During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains. | Spill kits are provided across all the plants. Dyke walls /curb walls are provided wherever required towards secondary containment.<br>**(Refer to annexure – 27 )** | Complied. |
| 20 | The company shall harvest surface as well as rain water from the rooftops of the building and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water. | We have provided harvesting system for rain water.<br><br>Photographs are attached<br>**(Refer to annexure – 28 )** | Complied. |
| 21 | 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 OISD 117 norms. | State of the art Fire Fighting equipments are in place in strategic locations. Fire equipments includes Fire Extinguishers, Fire hydrant system, Fire alarm system and Automatic foam flooding systems are in place. We have a dedicated Fire hydrant system and having 2 hours fire fighting provision with dedicated fire hydrant reservoir of 550 KL capacity. Automatic fire detection cum alarm system is available. Manual Call Points are available at various strategic locations. Fire alarm panels are monitored by Security round the clock. Critical areas are provided with automatic fire suppression type fire extinguishers. Entire site is covered with dedicated fire hydrant system which is kept in 'auto' mode. Electrical pump, Diesel pump and Jockey pump are made available in fire pump house which are hooked to a dedicated fire water reservoir. | Complied. |

| | | | |
|---|---|---|---|
| | | Aqueous Film Forming Foam (AFFF) solution is maintained at strategic locations. Portable fire extinguishers are placed at strategic locations across the site. Fire Extinguishers of different types like Dry Powder, Carbon dioxide, Mechanical Foam are available. | |
| | | We also having 73 Members of Emergency Response Team (ERT Members) and they have undergone special training from the Fire department. We have engaged one retired District Fire officer for the Fire Fighting training and he visits the site once in 2 days and conducts the training to all the ERT members photographs are attached. **(Refer to annexure – 29)** | |
| 22 | Training shall be imparted to all employees on safety and health aspect 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 chemical shall be imparted. | Trained "Emergency Response Team (ERT)" members present in all shifts to mitigate any emergency situation. ERT members given various training on fire fighting, first-aid, evacuation & rescue through practical drills. . HSE induction and refresher training imparted to employees and workers. Training organized through Annual HSE Training Calendar. Training records are being maintained. | Complied. |
| | | Trained first-aiders are present to handle emergency situations **(Refer to annexure – 30)** | |
| 23 | Usage of PPEs by all employees / workers shall be ensured. | Various types of PPE are maintained and distributed to workers on regular basis. | Complied |
| 24 | Occupational health surveillance of the worker shall be done on a regular basis and record maintained as per the factories Act. | Annual medical check-ups are performed for employees and workers. Fully equipped Occupational Health Centre is established within the premises which is monitored by qualified Doctor. Sample reports are attached . **(Refer to annexure – 31)** | Complied. |



SAI LIFE SCIENCES LTD. BIDAR UNIT-IV

| | | | |
|---|---|---|---|
| 25 | Green belt shall be developed in at least 33 % of area with suitable species of the plants as per as CPCB guidelines it mitigate the effect of fugitive emissions. Selection of the plant species shall be as per the CPCB guidelines | Adequate area of Green belt is available in our factory premises. **(Refer to annexure – 32)** | Complied. |
| 26 | The adequate financial provisions shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be diverted for any other purpose. | All EHS requirements are fulfilled in totality. SAI considers EHS are integral parts of business and sufficient funds are sanctioned to build and maintain best class facilities. | Complied. |
| 27 | The company shall comply with the recommendation made in the EIA/EMP/Risk assessment report. Risk assessment shall be included in the safety Manual. | The risk Assessment has been included in on-site emergency plan. | Complied. |
| 28 | Provision shall be made for the housing construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction waste shall be managed so that there is no impact on the surrounding environment. | Noted. Provisions like canteen, drinking water, toilets and medical health care are provided to contract work force engaged in construction activity. As the factory is situated in an industrial area, housing facility was not provided. | |
| 29 | The coal to be stored in coal stockyard on impervious layer in a covered shed and along the boundary garland canal to be provided leading to a exit pond/tank to arrest coal dust run-off and to allow settling of coal fines. The coal fines to be removed periodically. | Dedicated coal storage yard with shed and impervious flooring available. Photographs are attached . **(Refer to annexure – 26)** | Complied. |
| 30 | Avoids bromination processes(wherever followed) | Point is Noted. Manufacturing process does not include bromination reaction. | Complied |



SAI LIFE SCIENCES BIDAR UNIT-IV

| | | | |
|---|---|---|---|
| 31 | Recovers Lithium salts from the effluents wherever Lithium compounds are used in the reactions. | Point is Noted. Lithium Salts are recovered to the maximum possible extend. | Complied |
| 32 | Treatment of recalcitrant to be documented and kept at all times | Point is Noted. All effluent streams are treated in in-house waste water recycling facility (ZLD) and log sheets are being maintained. | Complied. |
| 33 | Adopts Good Management Practices (GMP)&Green chemistry. | Point is Noted. Facility is GMP certified and approved by USFDA and PMDA - Japan. | Complied |
| 34 | Storage facilities for the fuel shall be made in the plant area in consultation with Department of Explosives, Nagpur. Disaster Management plan shall be prepared to meet any eventuality in case of an accident taking place due to storage of Fuel. | Diesel is being stored in PESO approved premises. We have an On-site Emergency Plan to control the accidents and incident. Storage tank farm is equipped with pressure control valve, flame arrestor, breather valve, Nitrogen blanketing system, earth rite system. Attached Photographs of Foam Flooding System. **(Refer to annexure – 20)** | Complied. |
| 35 | The project authorities also shall earmarked at least 2.5% of the total cost of the project towards the Corporate Social Responsibility and item-wise details along with time bound action plan shall be prepared and submitted to the authority | Complied and on-going. Sai is associated with NGOs like SAFA and Healing Fields in improving livelihood of under privileged communities near by. **(Refer to annexure –33 for Full details )** | Complied |
| 36 | The proponent shall share the cost of mitigative measures that would be undertaken by the Karnataka State Pollution Control Board to rectify the environmental damage caused on pro-rata basis on lieu of the direction of the Government of Karnataka issued under section 18 (i) (b) of the water (Prevention and Control of Pollution) Act, 1974 to get an assessment of the extent of environmental damage caused by the industries operating in the Kolhar Industrial Area and to undertake relevant remedial measures at the cost of industries in Kolhar | Noted. | Noted. |

| | | | |
|---|---|---|---|
| | Industrial Area. | | |
| 37 | The project proponent shall be abide by the outcome of the report of the Hon'ble House Committee with regard to the complaint regarding the pollution of Kolhar Industrial Area. | Noted. | Noted. |
| 38 | The project proponent shall extent all cooperation for the establishment of CETP by the KIADB in the Kolhar Industrial Area. | Sai Life Sciences is the part of the project establishment of CETP and Sai Life Sciences Ltd, Unit - IV has contributed the Amount of Rs.5.0 Lakhs for the initial contribution. We are the member of Bidar Enviro Management services and Bidar District Chemical and Pharmaceutical Association. Receipt enclosed. **(Refer to annexure – 34)** | Complied |
| 39 | The Industry shall not operate without a functional effluent treatment plant as per the order of the Hon'ble supreme court dated February 22, 2017 in W.P.No.375 of 2012. | We have a Zero Liquid Discharge (ZLD) unit comprising of Biological ETP, Multiple Effect Evaporation system (MEE) and Reverse Osmosis (RO) Unit. Permeate from RO is used in cooling tower make up. Reports are submitting to the Board regularly for the existing plant. **(Refer to annexure – 1)** | Complied |

**General conditions :**

| S.NO | General conditions | Compliance status | Remarks |
|---|---|---|---|
| 1 | The project authorities shall strictly adhere to the stipulations made by the Karnataka state pollution Control Board (KSPCB) | Noted.<br>All conditions stipulated by KSPCB are being complied. | |

| | | | |
|---|---|---|---|
| 2 | At no time, the emission shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved. | Noted.<br>Emission monitoring is carried out on regular basis through approved laboratories and are well within limits. The reports are submitted to board on monthly basis. Also, a preventive maintenance schedule is in place for the upkeep of all pollution control equipment. | Complied |
| 3 | No further expansion or modifications in the plant shall be carried out without prior approval of the SEIAA/ministry of Environment and Forest as the case may be. In case of deviations or alteration in the project proposal from those submitted to this Authority for clearance, a fresh reference shall be made to the Authority to assess the adequacy of conditions imposed and to add the Authority to assess additional environmental protection measures required, if any. | Noted and being complied. No modification were carried out without approval from SEIAA/MoEF. | Complied |
| 4 | The gaseous emission (PM10, PM2.5, SO2, NOX, CO, VOC ) and particulate matter along with RSPM levels from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system (s) adopted by the unit, the respective unit shall not be restarted until the control measure are rectified to achieve the desired efficiency. Stack monitoring for PM10, PM2.5, SO2, NOX, CO, VOC shall be carried. | Noted.<br>Emission monitoring is carried out on regular basis through approved laboratories and are well within limits.The reports are submitted to board on monthly basis. Also,a preventive maintenance schedule is in place for the upkeep of all pollution control equipment. | Complied |

| | | | |
|---|---|---|---|
| 5 | The project authorities shall strictly comply with the rules and regulations under manufacture, Storage and Import of Hazardous Chemicals Rules,1989 as amended in October 1994 and January 2000. All transportation of Hazardous Chemicals shall be as per the MVA,1989. Authorization from the KSPCB shall be obtained for collection, treatment, storage and disposal of hazardous wastes. | Noted and complied. Authorization has been obtained for collection, treatment, storage and disposal of hazardous waste. | complied |
| 6 | The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous waste in accordance with the Hazardous Waste and other waste (Management and Handling) Rules, 2003.Authorization from the KSPCB must be obtained for collection/treatment/storage/disposal of hazardous wastes. | Plant has valid HW authorization. We will obtain the same for expanded site. We have a dedicated Hazardous waste shed for all the waste and collected in HDPE containers. **(Refer to annexure – 25 )** | Complied |
| 7 | Application of solar energy should incorporated for illumination of common areas, Lighting for gardens and street lighting is a addition to provision for solar water heating. A hybrid system of fully solar for lighting and heating should be provided. Details i this regards should be submitted to the SEIAA. | We have initiated projects to incorporate solar energy for illumination and heating. As a part of the project we have installed solar street lights. Also, we have entered into an agreement with M/s Ecoren Energy India Pvt. Ltd and M/s Greenergy solar enterprise Pvt. Ltd to draw solar energy. During the financial year 2020, we have consumed nearly 23.20 Lakhs units (KWh) of solar energy. **(Refer to annexure –35 for Full details )** | |
| 8 | The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA ) by providing the noise control measures including acoustic hoods, silencers, enclosures etc. On all sources of noise | Noise monitoring is done at regular intervals. Results are submitting to the Noise level reports are monthly Submission to KSPCB Board. Various location Noise levels excel sheet is attached. | Complied. |

| | | | |
|---|---|---|---|
| | generation. The ambient noise levels shall conform to the standards prescribed under environment (Protection) Act, Rules, 1989 viz. DBA (day time) and 70 dBA (night time). | **(Refer to annexure – 36)** | |
| 9 | The project proponent shall also comply with all the environment protection measures and safe guards as per the information provided. | Noted and all protective measures to safe guard environment are being taken. | Complied. |
| 10 | The implementation of the project vis-a-vis environmental action plan shall be monitored by MoEF, Regional office at Bangalore / KSPCB / CPCB and the Department of Environment & Ecology , Bangalore . A six monthly compliance status report shall be submitted to monitoring agencies. | Noted. Compliance reports are being submitted on regular basis. | Complied |
| 11 | The project proponent shall inform the public that the project has been accorded environmental clearance by the SEIAA and copies of the clearance letter are available with the KSPCB and may also be seen at Website of the authority at https://www.seiaa.karnataka.gov.in http:// environmentclearance.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 regional of which one shall be in the vernacular language of the locality at concerned and a copy of the same shall be forwarded to the MoEF Regional Office at Bangalore/KSPCB/CPCB and the Department of Environment & Ecology, Bangalore / kalaburgi. | Paper advertisement given on 11.05.2017 in Regional and English news papers. A copy enclosed . **(Refer to annexure – 37)** | Complied |
| 12 | The project authorities shall inform the MoEF Regional Office at | Noted;Above condition are being followed | Noted |

| | | | |
|---|---|---|---|
| | Bangalore/KSPCB/CPCB and the Department of Environment & Ecology, Bangalore, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project. | | |
| 13 | The SEIAA, Karnataka may revoke or suspend the clearance, if implementation of any of the above condition is not satisfactory. | Noted. Above recommendations are being followed. | Noted |
| 14 | The SEIAA, Karnataka reverses the right to stipulate additional condition, if found necessary. The company in a time bound manner will implement these conditions. | Noted. Above condition are being followed and implemented. | Noted |
| 15 | The above conditions will be enforced , inter-alia under the provisions of the water 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. | | |
| 16 | The issue of the Environment Clearance doesn't confer any right to the project Proponent to operate/run the project without obtaining statutory clearance/sanction from all other concerned Authorities. | Noted.<br>All necessary permits, licenses and NOCs have been obtained from concerned departments. | Noted |
| 17 | Concealing factual data or submission of false /fabricated data and failure to comply with any of the conditions mentioned above may results in withdrawal of this clearance and attract action under the provisions of Environmental (Protection) Act, 1986. | Noted.<br>All recommendations and condition are being followed/implemented . | Noted |



SAI LIFE SCIENCES LTD. BIDAR UNIT-IV

| | | | |
|---|---|---|---|
| 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 National Green Tribunal Act, 2010. | Noted | Noted |
| 19 | Officials from the Department of Environment and Ecology, Bangalore/ kalaburgi/ Regional Office of MoEF, Bangalore who would be monitoring the implementation of Environmental safeguards should be given full cooperation, facilities and document/ data by the project proponents during their inspection. A complete set of all the documents submitted to MoEF /SEIAA should be forwarded to the APCCF, Regional office of MoEF Bangalore / Department of Ecology and Environment, Bangalore / kalaburgi, Regional Officer, KSPCB Bangalore. | Noted.<br>Complete set of documents submitted to MoEF/SEIAA has been forwarded to MoEF Bangalore, Department of ecology and environment and regional office KSPCB. | Noted |
| 20 | In the Case of any change(s) in the scope of the project, the project would require a fresh appraisal by this authority. | Noted,<br>There is no change in scope of project. | Noted |
| 21 | The authority reserve the right to add additional safeguards measures subsequently, if found necessary, and to take action including revoking of the environment clearance the provision of the environment (protection) Act,1986, to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manner. | Noted.<br>All suggested safeguard measures are implemented. | Noted |
| 22 | All other stator clearance such as the approvals for storage of diesel from chief controller of Explosives, Fire department, Civil Aviation Department, Forest Conservation | Noted.<br>All necessary permits, licenses and NOCs have been obtained from concerned departments. | Complied |

| | | | |
|---|---|---|---|
| | Act,1980 and wildlife (Protection) Act'1972 etc. Shall be obtained, as applicable by project proponents from the competent authorities. | | |
| 23 | These stipulations would be enforced among Others under the provision of water (Prevention and control of pollution)Act, 1974, the Air (Prevention and control of pollution) Act' 1981, Environment (protection ) Act,1986, the public Liability (Insurance) Act,1991 and EIA noticication,2006. | | |
| 24 | Under the provisions of Environment (protection) Act, 1986' legal action shall initiated against the project proponent if it is found that construction of the project has been started without obtaining environmental clearance. | Noted, and being followed. | Noted |

| | |
|---|---|
| Annexure 1 | Photographs of ZLD facility and analysis reports. |
| Annexure 2 | Impervious lining images. |
| Annexure 3 | Letters submitted to KSPCB and KIADB regards fresh water quality. |
| Annexure 4 | DG set acoustic enclosure, DG stacks & noise level monitoring reports. |
| Annexure 5 | Ambient air quality reports. |
| Annexure 6 | Main gate KSPCB display board and stack reports. |
| Annexure 7 | ERT members training photos. |
| Annexure 8 | Photographs of PTS glove box, DCS, condensers provided by RT, vent condensers, water mist, bag filter. |
| Annexure 9 | Photographs of Solvent storage tank farm is equipped with Nitrogen padding facility and Earth rite system. Foam flooding system for Drum shed . |
| Annexure 10 | Catalyst sending to vendors. |
| Annexure 11 | Photographs of Reactor Sampling device, drum booth charging . |
| Annexure 12 | Photographs of PTS glove box and DCS. |
| Annexure 13 | Vent condenser system. |
| Annexure 14 | CIP system. |
| Annexure 15 | Photographs of Solvent dispensing booth, and drum booth for solvent transfer. |
| Annexure 16 | Photographs of Reflux/Double condensers. |
| Annexure 17 | List of critical equipments preventive maintenance. |
| Annexure 18 | Photographs of scrubbers. |
| Annexure 19 | Photographs of Earth rite system. |
| Annexure 20 | Photographs of solvent tank farm area & Nitrogen blanketing . |
| Annexure 21 | Breather valve for solvent storage tanks. |
| Annexure 22 | VOC monitoring reports. |
| Annexure 23 | Cyclone separator, bag filter, stack height, on line stack emission report. |
| Annexure 24 | Scrubber log sheet and Stack reports. |
| Annexure 25 | Photographs of Hazardous waste storage shed. |
| Annexure 26 | Photographs of Dedicated coal storage shed, water mist system, closed conveyor system |
| Annexure 27 | Photographs of Spill control kit with dyke or curb wall . |
| Annexure 28 | Photographs of Rain water harvesting pit. |
| Annexure 29 | ERT member list. |
| Annexure 30 | Annual HSE training calender |
| Annexure 31 | Dr.Rane's Diagnostic Centre, annual medical check up reports |
| Annexure 32 | Photographs of Green belt. |
| Annexure 33 | CSR activities photos |
| Annexure 34 | CETP membership |
| Annexure 35 | Solar Energy consumption details. |
| Annexure 36 | Noise level monitoring reports. |
| Annexure 37 | News paper advertising. |