



भारत सरकार  
GOVERNMENT OF INDIA

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE  
एकीकृत क्षेत्रीय कार्यालय, जयपुर / Integrated Regional Office, Jaipur



By Speed Post/e-mail

File No. SEIAA/Raj/1535/113/0115

Dated: 11.08.2021

To

The Member Secretary,  
STATE LEVEL EXPERT APPRAISAL  
COMMITTEE (SEAC), RAJASTHAN  
4- Jhalana Institutional Area,  
Jaipur - 302004

Sub: Environment Clearance for Proposed expansion of Production Capacity with change in the Product Mix for manufacturing of Herbal Extracts and Active Pharmaceutical Ingredients (Expansion Capacity - From 200 Kg/Day to 735 Kg/Day) of M/s Alchem International Pvt. Ltd. situated at SP-2-5 RIICO Industrial Area, District Alwar (Rajsthan) - **Certified Compliance Report Reg.**

Ref: Environment Clearance issued vide letter no. F1 (4)/SEIAA / SEAC-Raj / Sectt/ Project / Cat. 1(a) B1 (15361)/ 2019-20 dated 24/07/2019 and Amendment in Environmental Clearance issued by SEIAA-Rajasthan vide letter no. F1(4)/ SEIAA/SEAC-Raj Sectt Project Cat. 5(F) B2 (15361) /2019-20 dated on 11.05.2020.

Sir,

With reference to the cited subject it is bring to your notice that the aforesaid project was visited on 24/07/2021 by the undersigned for the purpose of issuing certified compliance report of the pervious environment clearance issued to the unit vide aforementioned letters. Accordingly a detailed monitoring report along with key observations is being attached herewith for perusal and further appropriate action.

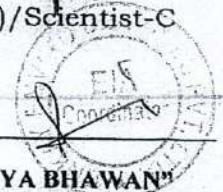
On the basis of overall compliance status of the unit, it can be construed that there are no major non compliances and it is also evident that necessary steps have been taken by the unit to ensure the compliance of environment clearance conditions.

Sincerely,  
*Mahesh*  
(Mahesh Dutt Purohit)  
Deputy Director (S)/Scientist-C

Copy to:-

1. The Additional Director/Scientist-'E', Monitoring Cell, Ministry of Environment, Forest & Climate Change, 3rd Floor, Vayu Wing, Indira Paryavaran Bhawan, Jor Bagh New Delhi - 110003. - For kind information please.
2. Director, M/s Alchem International Pvt. Ltd. SP-2-5 RIICO Industrial Area, Tehsil Neemrana, District Alwar (Rajsthan) - With directions to submit clarifications on partially complied conditions directly to the SEAC under intimation to this office.

*Mahesh*  
Deputy Director (S)/Scientist-C



ए 209 & 218 "अरण्य भवन", झालाना संस्थानिक क्षेत्र, जयपुर - 302004 / A-209&218, "ARANYA BHAWAN"  
Jhalana Institutional Area, Jaipur-302004

दूरभाष/Tel No: 0141-2713786, 2713778 Email: iro.jaipur-mefcc@gov.in

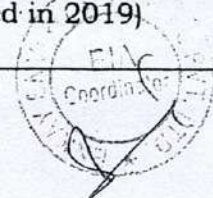
**Ministry of Environment, Forests & Climate Change  
Integrated Regional Office,  
Jaipur - 302001**

**MONITORING REPORT**

**PART - I**

**DATA SHEET**

1.	Project Type	Industry
2.	Name of the Project	Environment Clearance for Proposed expansion of Production Capacity with change in the Product Mix for manufacturing of Herbal Extracts and Active Pharmaceutical Ingredients (Expansion Capacity - From 200 Kg/Day to 735 Kg/Day) of M/s Alchem International Pvt. Ltd. situated at SP-2-5 RIICO Industrial Area, District Alwar (Rajsthan) for an area of 76970 Sq.m.
3.	Clearance letter / O.M No. & date	Environment Clearance accorded vide letter no. F1 (4)/SEIAA / SEAC-Raj / Sectt/ Project / Cat. 1(a) B1 (15361)/ 2019-20 dated 24/07/2019 Amendment in Environmental Clearance issued by SEIAA-Rajasthan vide letter no. F1(4)/SEIAA/SEAC-Raj Sectt Project Cat. 5(F) B2 (15361) /2019-20 dated on 11.05.2020
4.	<b>Location</b> a) Tehsil b) District (s) c) State (s) d) Latitudes/Longitudes	SP 2-5 , RIICO Industrial area , Phase 1, District- Alwar a)Tehsil - Neemrana b)District (s)- Alwar c) State (s) - Rajasthan Latitude 27° 58'29.28" N Longitude 76 °26'10.04" E
5.	<b>Address for correspondence</b> a) Address of Concerned Project Chief Engineer (with Pin Code/ Tel No./ Telex/Fax No./E-mail address) b) Address of Executive Project Engineer/Manager (with Pin Code/ Tel No./ Telex/Fax No./E-mail address)	Project Chief Engineer - N K Singh SP 2-5 , RIICO Industrial area , Phase 1, Neemrana, District- Alwar, 301705
6.	<b>Salient features</b> a) of the project	Manufacturing unit of herbal extracts and active pharmaceutical ingredients having production capacity as 735 kg/Day. At present under construction (with reference to the production Capacity and Product Mix for which EC issued in 2019)



7.	Product/Process/Activity Details	Pure Herbal and Semi Synthetic extracts and API
8.	Production Capacity	735 kg/day
9.	Break-up of project affected population	NA
10.	<b>Financial details: (as reported by the PP)</b> a) Project cost as originally planned and subsequent revised estimates and the year of price reference b) Allocations made for environmental management plans with item wise and year wise break up c) Benefit cost ratio/internal rate of return and the year of assessment d) Whether (c) includes the cost of environmental management as shown in b) above e) Actual expenditure incurred on the project so far f) Actual expenditure incurred on the environmental management plans so far	a) 51.11 Cr. b) 7.11 Cr. c) NA d) Yes. e) 43.34 Cr. f) 7.5 Cr.
11.	Forest land requirement:	NA
12.	The status of clear felling in non-forest areas	NA
13.	Status of construction: a) Date of commencement ( <i>actual and/or planned</i> ) b) Date of completion ( <i>actual and/or planned</i> )	Date of start of production -30.08.2021 (estimated)
14.	Reasons for the delay, if the project is yet to start	-
15.	Details of correspondence with project Authorities for obtaining act on plans/information on status of compliance to safeguards other than the routine letters for logistic support for site visits). (The first monitoring report may contain the details of all the letters issued so far, but the later reports may cover only the letter issued subsequently)	-

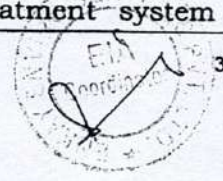
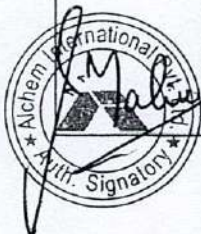


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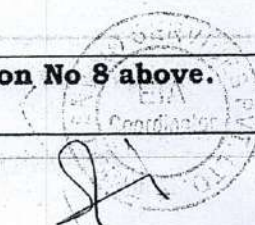
**PART - II**

**DESCRIPTIVE REPORT ON STATUS OF COMPLIANCE TO CONDITIONS OF ENVIRONMENTAL CLEARANCE** issued vide letter No. F1 (4)/SEIAA / SEAC-Raj / Sectt/ Project / Cat. 1(a) B1 (15361)/ 2019-20 dated 24/07/2019 amendment letter dated F1(4)/ SEIAA/SEAC-Raj Sectt Project Cat. 5(F) B2 (15361) /2019-20 dated on 11.05.2020

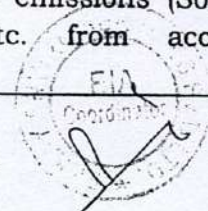
A.	Specific Conditions	
S.No.	Condition	Compliance
1	The EC is issued for the proposed expansion of production capacity from 200 Kg. per day to 735 Kg per day with change in product mix for manufacture of herbal extracts and active Pharmaceutical Ingredients as per details mentioned in above table.	<b>Agreed for compliance by the unit.</b>
2	The PP shall obtain Consent to Establish and Operate from the Rajasthan Pollution Control Board under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981, before carrying out production activity.	<b>Being Complied.</b> The unit has obtained CTE from the SPCB obtained which is valid upto 31/08/2024. As the project is still under construction, the CTO can be obtained after completion of the project.
3	The PP shall make compliance of the provisions of the Environment (Protection) Act, 1986 and the rules and notifications issued there under	<b>Agreed for Compliance by the unit.</b>
4	This E.C is issued from the environmental angle only, and does not absolve the project proponent from the other statutory prescribed under any other law or any other instrument in force. The sole and complete responsibility, to comply with the conditions laid down in all other laws for the time-being in force, rests with the industry/unit/project proponent. 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 Tribunal Act, 2010.	<b>Agreed for Compliance by the unit.</b>
5	As committed, the PP shall earmark and spent of Rs. 711.75 Lac as capital cost and Rs. 75.00 Lac per annum recurring cost towards various environmental protection measures and implementation of various activities under Environmental Management Plan.	<b>Partially Complied.</b> It was appraised by the unit representative that separate funds have been earmarked by the unit for EMP activities. As the project for which the EC was accorded in 2019 is still under construction, at present capital expenditure is being done for establishment of treatment system upto



		<p>ZLD. The Itemized details of funds under various head of EMP activity (Capital Exp.) is as follows:</p> <ol style="list-style-type: none"> <li>1. Air Pollution Control/ Noise <b>Rs 20 Lac.</b></li> <li>2. Water Pollution Control <b>Rs. 300 Lac</b></li> <li>3. Environmental Monitoring and Management <b>Rs. 72 Lac</b></li> <li>4. Green Belt Development <b>Rs. 10 Lac.</b></li> <li>5. Occupational Health <b>Rs. 4 Lac.</b></li> </ol> <p>The PP was advised to utilize entire amount as stipulated vide the condition by the time project is completed and submit itemized details of total expenditure incurred.</p>
6	The PP shall earmark and spent an amount of Rs. 38.25 Lac as CSR (during 2018-22) as per the proposed submitted and the detailed action plan be submitted to RSPCB at the time seeking CTE.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
7	Total water demand for proposed expansion will be 297 KLD (fresh water demand 200 KLD and the recycled water demand is 97 KLD). The necessary permission of water supply should be obtained and submitted to RSPCB. For withdrawing ground water from bore wells, necessary permission from CGWA shall be taken.	<p><b>Being Complied.</b></p> <p>It was appraised by the unit representative that the total fresh water requirement shall be 200 KLD (existing 64 KLD and Proposed 136 KLD ) for which application for obtaining NOC of abstracting ground water from CGWA has been submitted and the same is under consideration at the level of CGWA.</p>
8	The industrial waste water will be treated in ETP of 120 KLD capacity followed by two stage RO plant, keeping zero liquid discharge (ZLD) by way of reusing the entire treated waste water in cooling tower. The RO reject waste water shall be disposed through adequate capacity Multi Effect Evaporator (MEE) plant so as to maintain ZLD. The construction of the ETP, RO plant and MEE should be carried out simultaneously with that of the project and should be functional before the project is put into use. An independent expert shall certify the installation of the Effluent Treatment Plant (ETP), RO & a report in operation. Treated waste water shall conform to the norms & standards of the Rajasthan State Pollution Control Board.	<p><b>Complied.</b></p> <p>During the visit no effluent discharge outside the project premises was observed from existing plant and the new plant is also being designed on ZLD. The unit has proposed to install MVR instead of MEE which is a more energy efficient choice. The PP has planned ETP of capacity 140 KLD , RO of capacity 180 and MVR of capacity 30KLD to maintain the zero liquid discharge .</p>
	As already committed by the project proponent. Zero Liquid Discharge	<b>Same as Condition No 8 above.</b>



	proponent. Zero Liquid Discharge shall be ensured and no waste treated water shall be discharged outside the premises.	
10	The project proponent shall provide online continuous monitoring system and install web camera with night vision capability and flow meters in the channel drains carrying effluent in the premises.	<b>Agreed from Compliance by the unit.</b> The unit has already established online monitoring system for Air emissions within the project premises.
11	The domestic waste water will be treated in STP of 20 KLD capacity and treated waste water, conforming to prescribe standards, will be used for plantation and other gainful utilization within the premises.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
12	The ETP, STP and RO shall have a separate hour meter and energy meter and the record of the same shall be maintained.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
13	The PP should provide at least 4 no. of peizeometric wells in the premises and the locations of such wells shall be decided in consultation with the Regional Officer and shall carry out half yearly monitoring of these wells. Location of the well should be shown in the map.	<b>Partially Complied.</b> Out of 4 no of peizeometric wells in the premises, 1 has been installed and it was appraised that remaining 3 will be installed before the commissioning of existing plant.
14	Process effluent/any waste water 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.	<b>Complied.</b> Storm Water and effluent are having separate conveyance system.
15	The PP shall achieve the stack emission standards and ambient air standards as notified under E.P. Rules 86 and its subsequent amendments.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b> The unit has also submitted analysis reports from accredited laboratory regarding the emissions of existing plant which is within the prescribed standards.
16	In case of the stack for disbursement of the process emissions shall not less than 30.00 Mtrs. from ground level.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
17	In case of coal fired boiler the PP shall explore the possibility of use of gas.	<b>Complied.</b> The unit is having a 4TPH gas fired boiler.
18	The particulate matter and gaseous emissions (So <sub>x</sub> , NO <sub>x</sub> , CO, CO <sub>2</sub> , Cl <sub>2</sub> etc.) from various processes/units/storages shall conform to the standards prescribed by the State Pollution Control Board/Central Pollution	<b>Complied.</b> The unit has submitted monitoring reports of stack and DG set for the particulate matter and gaseous emissions (So <sub>x</sub> , NO <sub>x</sub> , CO, CO <sub>2</sub> , Cl <sub>2</sub> etc. from accredited laboratory.



	Control Board or under the Environment (Protection) Rules'86 from time to time.	
19	The Project Proponent shall provide online continuous monitoring system at all the major stacks (if applicable) as per the CPCB guideline and ensure connectivity of the same with CPCB & RSPCB server.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b> Online continuous monitoring system for air emission has been installed by the unit. The unit representative agreed to install the same on all major stacks after the completion of ongoing project.
20	At no time, the emissions shall go beyond the prescribed standards. In the event of failure of any pollution control system adopted by the unit shall immediately put off operation and shall not restart until the control measures are rectified to achieve the desired efficiency.	<b>Being Complied.</b>
21	Ambient air quality monitoring stations shall be set up in the downwind directions as well as where maximum level concentration of PM <sub>10</sub> & PM <sub>2.5</sub> , Sox, NO <sub>x</sub> , CO, CO <sub>2</sub> , are anticipated in consultation with Rajasthan Pollution Control Board.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
22	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16 <sup>th</sup> November, 2009 shall be completed with.	<b>Being Complied.</b>
23	The project proponent shall carry out regular monitoring of air emissions (at source, work environment, and ambient air) and assessment of performance of Air pollution control arrangements.	<b>Being Complied.</b> Periodic air monitoring is being carried out by accredited laboratory.
24	Portholes and sampling facilities shall be provided for the stacks emissions monitoring as per the CPCB guidelines. Stack emissions shall be monitored in consultation with RPCB.	<b>Complied.</b> Portholes and sampling facilities have been provided for stacks emissions monitoring in existing plant.
25	The PP shall draw the Safety, Health & Environment (SHE) Plan and submit to RPCB.	<b>Being Complied.</b> Health, Safety & Environment (HSE) Plan has been prepared and submitted by the unit.
26	Data on ambient air quality and stack emissions shall be submitted to RPCB, once in six months carried out by MOEF, NABL, CPCB Govt. approved lab.	<b>Being Complied.</b>
	The PP shall provide separate drainage	<b>Being Complied.</b>



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	and outlets with the precaution that the storm water shall not come into contact with waste sludge.	
28	The unit shall obtain proper authorization from Rajasthan State Pollution Control Board, if it generates any waste which falls under the purview of HWMHE-2008.	Being Complied. The unit has already obtained Hazardous waste Authorization from Rajasthan State Pollution Control Board for existing plant and the unit representative assured to obtain the same for ongoing project.
29	Handling, manufacture, storage and transportation of hazardous chemicals shall be in accordance with the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 (amended till date)	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
30	Adequate measures for the control of noise shall be taken so as to keep the noise levels below 85 dB (A) in the work environment. Persons working near the machines shall be provided with well-designed ear muffs and other personnel protective equipments.	<b>Being Complied.</b> Necessary steps have been taken by the PP for abatement of noise at the source. The DG Set has also been placed within the acoustic enclosure.
31	Suitable alarm system and standard procedure for transmitting the information on the occurrence of an accident to the proper focal point shall be established.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
32	Efforts shall be made to increase green belt all around the premises. Native plant species shall be selected for this purpose in consultation with the local Forest Department. A green belt development plan shall be prepared and implemented so as to cover at least 33% area of the plot size.	<b>Being Complied.</b> Decent efforts have been done by the unit for development of plantation and green cover. It was appraised by the unit representative that more than 1500 plants have been planted within the unit premises. Overall plantation is good and the unit representative was advised to further increase the plantation during the ongoing monsoon season.
33	The PP shall provide stacks of adequate height at the proposed once D.G. Set (IXI000 KVA) with acoustic enclosures for noise controls as per CPCB guidelines. The DG Sets shall comply with the norms notified Environment (Protection) Act, 1986.	<b>Complied.</b> Stack and acoustic enclosure has been provided on the DG Set.
34	A qualified person in the field of environment or separate Environmental Management Cell to be established to implement and carry out various functions is set up under the control of a Senior Executive who	<b>Being Complied.</b>





	will report directly to the head of the project.	
35	The PP shall provide all necessary facilities like health facility, sanitation facility, fuel for cooking safe drinking water, medical camps, and toilets for women, crèche for infants etc. for labors. As proposed the PP shall earmark and spend an amount of Rs. 0.5 as annual recurring cost for labor welfare.	<b>Being Complied.</b> Basic facilities have been provided for employees.
36	The PP will ensure that no employee or worker remains on duty within the plant premises for more than 8 hrs per day in once stretch in normal conditions. However based on plant operation and maintenance tasks, overtime can be provided as per the Rajasthan Factories rules for personnel deployed for more than 8 hrs.	<b>Being Complied.</b>
37	The funds earmarked for the environmental protection measures shall be kept in separate account and shall not be diverted for other purposes and year wise expenditure shall be reported to the Rajasthan State Pollution Control Board under the rules prescribed for environmental audit.	<b>Being Complied.</b> It was appraised by the unit representative that separate funds have been earmarked for EMP purposes and same is not being diverted for any other purposes.
38	The Periodical medical checkup of the workers shall be done in six months and records maintained and effects of fluorine on human health need to be taken into special consideration.	<b>Being Complied.</b>
39	The PP shall ensure that, the EC letter as well as the status of compliance of EC conditions and the monitoring data are placed on company's website and displayed as the project site.	<b>Not Complied.</b> During the visit, EC Letter and compliance report were not available on the website of the unit.
40	The SEIAA, Rajasthan reserve the right to add new conditions, modify/annual any condition and/or to revoke the clearance if implementation of any of the aforesaid condition/other stipulations imposed by competent authorities is not satisfactory. Six monthly compliance status reports on project along with implementation of environmental measures shall be submitted to MoEF,	<b>Agreed for Compliance by the unit.</b>



	Regional Office, Lucknow and RPCB and SEIAA, Rajasthan.	
41	The PP shall obtain prior clearance from forestry and wild life angle including clearance from standing committee of National Board of Wild Life, as applicable. It is further categorically stated that grant of EC does not necessary implies that forestry and wild life clearance shall be granted to the project and that proposals for forestry and wild life clearance will be considered by the respective authorities on their merits and decision taken. The investment made in the project, if any based on EC so granted, in anticipation of clearance form forestry and wild life angle shall be entirely at the cost risk of the PP and MOEF shall not be responsible in this regard in any manner.	<b>Not Applicable.</b> There is no Eco sensitive zone with in 10KM from project site.
42	The project proponent shall comply with the provisions contained in this Ministry's OM vide F. No. 22-65/2017-IA.III dated 1 <sup>st</sup> May, 2018, as applicable, regarding Corporate Environment Responsibility.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
43	The company shall have a well laid down environmental policy duly approve by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/forest/wildlife norms/conditions and/or shareholders/stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.	<b>Complied.</b> The unit is having a comprehensive Environmental Policy duly approve by the Board of Directors.
44	A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who wil directly to the level of the organization.	<b>Complied.</b>
	Action plan for implementing EMP and environmental conditions along with Responsibility matrix of the company	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>



	shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.	
46	Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.	<b>Agreed for compliance by the unit after expansion plant commissioning.</b>
<b>B.</b>	<b>General Conditions</b>	
3	The implementation of the project vis-a-vis environmental action plan shall be monitored by the MoEF&CC regional office at Lucknow/RSPCB/CPCB/Department of Environment Government of Rajasthan and this office. A six monthly complaint status report shall be submitted to the monitoring agency.	<b>Complied.</b> Last six monthly compliance report has been submitted by the unit.
8	The Project authorities should advertise at least in two local newspapers widely circulated around the project, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and may also be seen at web site of the Ministry of Environment & Forests.	<b>Complied.</b> The unit has submitted copy of Newspaper cutting.
13	Periodic Monitoring of ambient air quality shall be carried out for PM10, PM2.5 SPM, SO2 and NOx. Location of the stations (Minimum 6) shall be decided on based on the meteorological data, topographical features and environmentally and ecologically sensitive targets and frequency of monitoring shall be decided in consultation with the RSPCB. Six monthly compliance report of the data so collected shall be regularly submitted to RPCB/CPCB	Same as Condition no 15 of Specific Conditions above.

