

o/c



Sai

Make it
better
together

16th May 2023

To,
The Additional Director,
Regional office (Southern Zone),
Ministry of Environment, Forest and Climate Change,
Kendriya Sadan, 4th Floor, E&F Wings,
17th Main Road, 2nd Block, Koramangala,
Bangalore – 560034.

Sub: Submission of Half-yearly EC compliance status from October-2022 to March-2023. M/S Sai Life Sciences Limited., Unit-IV, plot No.79A, 79B, 80A, 80B, 81A, 82 and 130A, Kolhar industrial area, Bidar Taluk and District-585403, Karnataka State.

Ref: - Environment Clearance No. SEIAA 36 IND 2020, received on 28-August-2020 & EC Corrigendum received on 18-Jan-2022.

Respected Sir,

With reference to the above subject, we are herewith submitting the EC compliance status. Please find the enclosed copy with respect to the above cited subject.

Enclosed copy: Compliance report of EC Condition.

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-585 402.

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 – 560001.

Sai Life Sciences Limited (CIN: U24110TG 1999PLC030970)

Plot No. 79B, 80A, 82, 81-A, 80-B, Kolhar Industrial Area, Bidar-585 403, Karnataka, INDIA.

► Tel: +91 8482 232785/89 ► Fax: +91 8482 232239 ► info@sailife.com ► www.sailife.com

raghavendra

From: Anjaneyulu M V <anjaneyulu.m@sailife.com>
Sent: Wednesday, May 17, 2023 5:02 PM
To: rosz.bng-mefcc@gov.in
Cc: Srinivasa Raju A; Neetesh Patil; Satishkumar B; Anand M; SreeKrishna Chopperla; Raghavendra Pujari
Subject: HYR EC Compliance report (SEIAA 36 IND 2020 Dt 28-Aug-2020) - Sai Life Sciences Limited, Plot No-79A, 79-B, 80-A, 80-B, 81-A, 82 & 130A, Bidar
Attachments: HYR EC Compliance (SEIAA 36 IND 2020 Dtd 28th-Aug-2020)- Sai Life Sciences Limited.pdf

Dear Sir/Madam,

Pls. find the attached EC No: SEIAA 36 IND 2020 ,Dated-28-August-2020.-**EC-Compliance HYR (period from October 2022 – March 2023)** Status for the Proposed establishment of API,s ,Intermediates and R&D for custom synthesis products Manufacturing at Sai Life Sciences Limited Plot No- 79A, 79-B, 80-A, 80-B, 81-A, 82 & 130A, Kolhar Industrial Area, Bidar – 585403.

Report contains as mentioned below..

1. Covering letter
2. Environmental Clearance HYR Compliance Status report.
3. Environmental Monitoring reports.

Best regards,

MV Anjaneyulu

+91 9108924038



Sai Life Sciences Limited
79-B, 80-A, 80-B, 81-A, & 82
Kolhar Industrial Area
Bidar - 585 403, Karnataka, India.
www.sailife.com

**Environmental Clearance No. SEIAA - 36 IND 2020, Dtd: 28-August-2020.
Compliance report of EC Condition from October-2022 to March-2023.**



Environmental clearance No. SEIAA 36 IND 2020, Dtd: 28-Aug-2020. Accorded by State level Environment impact Assessment Authority -Karnataka (Constituted by MOEF, Government of India).

Name and Address of the Project: Sai Life Sciences Ltd.,
Unit-IV,
Plot No.79A, 79B, 80A, 80B, 81A, 82 &130A,
Kolhar Industrial Area,
Bidar Taluk &District-585403,
Karnataka State.

I.Statutory Compliance:

S.no	Specific Conditions	Compliance Status
1.	The project proponent shall obtain forest clearance under the provision of forest (conservation) Act, 1986 in case of the diversion of forest plant or non-forest plant purpose involved in the project.	Not applicable.
2.	The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.	Not applicable.
3.	The project proponent shall prepare a Site Specific Conservation Plan & Wildlife Management Plan and approved by the Chief Wildlife Warden. The recommendations of the approved site specific conservation plan / Wildlife management plan shall be implemented in consultation with the state forest department. The implementation report shall be furnished along with six-monthly compliance report.(In case of presence of schedule-1 species in the study area)	Not applicable.
4.	The project proponent shall obtained consent to establish / operate under the provisions of air (Prevention and control of pollution) Act, 1981 and the water (Prevention and control of pollution) Act, 1974 from the concerned state pollution control board / committee.	Complied. We have received of consent for establish (CFE) from Karnataka state pollution control board. Consent order No: 321677. Dtd: 19-Oct-2020.
5.	The project proponent shall be obtain authorization under the hazardous and other waste management rules,2016 as amended from time to time.	Complied. Noted and shall follow the same as per the MOEF / PCB rules and guidelines.
6.	The company shall strictly comply with the rules and guidelines under the manufacture, storage and import of hazardous chemicals (MSIHC) rules, 1989 as amended time to time. All transportation of hazardous chemicals shall be as per the motor vehicle act(MVA),1989	It is being followed.

II. Air quality monitoring and preservation:

1.	The project shall install 24*7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognized under environmental (Protection) Act, 1986 or NABL accredited laboratories	Noted. 1. Installed online continuous stack emission monitoring system (OCEMS) for Boiler stack, this real time data connected to KSPCB / CPCB server. 2. Stack emissions are monitored through approved laboratories and reports are submitted to KSPCB regional office on monthly basis. 3. Our OCEMS flow meter and emission sensor have been calibrated by recognized laboratories. Refer to annexure-1.
2.	The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognized under environment (Protection) Act, 1986.	Complied. Fugitive emission monitoring are being carried out and the reports is attached as refer to annexure-2.
3.	The project proponent shall install system to carryout Ambient Air Quality monitoring for common / criterion parameters relevant to the main pollutants released (e.g. PM10 and PM2.5 in reference to PM emission, and SO ₂ and NO _x in reference to SO ₂ and NO _x emissions) within and outside the plant area at least at four locations (One within and three outside the plant area at angle of 120 each), covering upwind and downwind directions.	Noted. It will be complied. Present we are monitored of Ambient Air quality through approved laboratories and reports are submitted to KSPCB regional office on monthly basis. Refer to annexure-3.
4.	To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and / or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emission shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.	Complied. Our boilers works on fluidized bed technology for effective combustion and has pulsating fiber glass bag filters for efficient emission control. The emission parameters are regularly monitored through a PCB approved third party laboratory and the reports are also submitted to board on monthly basis. Ensured adequate stack heights for boilers. Boiler coal Sulphur content reports are attached. Refer to annexure-4.
5.	Storage of raw materials, coal etc. shall be either stored in silos or in covered area to prevent dust pollution and other fugitive emissions.	Complied. A. Boiler coal storage in closed shed and provided water mist to control dust dispersion into environment . B. Closed conveyor system to handle the coal loading activity. C. Our Boiler works on fluidized bed

		technology for effective combustion and has pulsating fiber glass filters for efficient emission control (SPM< 100 mg/Nm ³). Refer to annexure-5.
6.	National Emission Standards for Organic Chemicals manufacturing industry issued by the ministry vide G.S.R.608 (E) dated 21st July, 2010 and amended from time to time shall be followed.	Complied. Regular monitoring of Ambient air quality, process emission and treated effluent are being carried out. The monitoring report are being submitted to the KSPCB regional office-Bidar in regular intervals.
7.	The national ambient air quality emission standards issued by ministry G.S.R NO. 826(E) dated 16th November, 2009 shall be complied with.	Noted and shall follow the same as per the MOEF / PCB rules and guidelines.

III. Water quality monitoring and preservation:

1.	The project proponent shall be provide online continuous monitoring of effluents, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises (applicable in case of the project achieving ZLD).	Complied. We have provided online continuous monitoring of effluents (OCEMS). Treated effluent flow meter connected to CPCB/KSPCB servers. Refer to annexure-6.
2.	As already committed by the project proponent, Zero liquid discharge shall be ensured and no waste/treated water shall be discharged outside the premises (applicable in case of the project achieving ZLD).	Complied. The unit has zero liquid discharge system (ZLDS). Comprising of Multiple effect evaporation system (MEE), Effluent treatment plant (ETP) and Reverse osmosis system (RO), and Effluent treated is used in cooling tower as a makeup.
3.	The effluent discharge shall conform to the standards prescribed under the environmental (Protection) Act, 1986, or as specified by the state pollution control board while granting consent under the Air/Water Act, Whichever is more stringent.	Complied. We have a Zero Liquid Discharge (ZLD) unit comprising of Biological ETP, Multiple Effect Evaporation system (MEE) and Reverse Osmosis (RO) Unit. Effluent treated is used in cooling tower as a makeup. Raw & treated effluent quality reports are submitting to the board regularly Refer to annexure-7.
4.	Total fresh water requirement shall not exceed the proposed quantity or as specified by the committee. Prior permission shall be obtained from the concerned regulatory authority/ CGWA in this regard.	Complied. 1. Water Consumption is being monitored on daily basis and is being complied within limits. 2. Ground water extraction NOC received from KGWA on 23-July-2021. Refer to annexure-8.

5.	The 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 separate conveyance system.	<p>Complied.</p> <p>A. Storm water not mixed with effluent and floor washing.</p> <p>B. Spill kits are provided across all the plants. Dyke walls /curb walls are provided wherever required towards secondary containment.</p> <p>C. All the site walkways & building pathways at site are provided with uniform sloping to drive the water towards the drainages & storm drain system.</p> <p>D. We have provided adequate rainwater storage tank.</p> <p>Refer to annexure-9.</p>
6.	The company shall harvest rain water from the roof tops of the building and storm water drain to recharge the ground water and utilize the same for different industrial operations within the plant.	<p>Complied.</p> <p>A. All the building constructed at site are provided with uniform sloping at the roof to drive the water towards the draining & catch basins.</p> <p>B. We have provided adequate rainwater collection and storage tank.</p>
7.	The DG sets shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in the this regard.	<p>Complied.</p> <p>A. All DG sets are provided with acoustic enclosures and stack height are adequate.</p> <p>B. Emissions are monitored by approved third party laboratories and reports are being submitted to Regional office on monthly basis.</p> <p>Refer to annexure-10.</p>

IV. Noise monitoring and prevention:

1.	Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	<p>Complied.</p> <p>A. All DG sets are provided with acoustic enclosures.</p> <p>Refer to annexure-11.</p>
2.	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.	<p>Complied.</p> <p>A. Noise levels monitoring is done at regular intervals. Noise levels report are being submitted to the PCB board regularly.</p> <p>B. Used proper lubrication to avoid excessive noise generation.</p> <p>C. Preventive maintenance in place and</p>

		extended to all equipment's performed by qualified of maintenance team. Refer to annexure-12.
3.	The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time	Complied. It is being followed.

V. Energy Conservation measures:

1.	The energy sources for lighting purposes shall preferably be LED based.	Complied. The energy conservation measures in unit and LED lights provided for lighting purpose.
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VI. Waste management:

1.	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.	Complied. 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 and foam flooding system are provided in tank farm area. Foam flooding automatic system is provided in drum shed area. Refer to annexure -13.
2.	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.	Noted and being followed.

The company shall undertake waste minimization measures as below

3	a.	Metering and control of quantities of active ingredients to minimize waste.	Waste minimization efforts are on-going and close monitoring of waste generation is in place
	b.	Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.	Noted and being followed
	c.	Use of automated filling to minimize spillage.	Complied. 1).Liquids are transferred from centralized tank farm area to process plants through dedicated closed pipelines and suitable MOC through an automated system. 2).Level controllers / Indicators are available in the reactors and storage tanks. Refer to annexure -14.
	d.	Use of Close feed system into batch reactors.	Complied. All powders are transferred through Powder Transfer System (PTS) and glove boxes. And liquids are transferred by applying vacuum or closed charging by pumps.

			Refer to annexure -15.
e.	Venting equipment through Vapour recovery system.		Complied Heat exchangers are provided wherever necessary. On need basis secondary /vent condensers are also provided with brine /chilled water cooling circulation system. Refer to annexure -16.
f.	Use of high pressure hoses for equipment clearing to reduce waste water generation.		Complied. CIP system and high pressure water jet machines are in place to reduce the waste water generation. Attached the photographs of CIP system. Refer to annexure -17.

VII.Green Belt:

1.	The green belt of 5-10 m width shall be developed in more than 33% 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.	Noted and shall follow the same as per the board guidelines. Adequate area of green belt is available in our factory premises Development of greenbelt in & around the plant (Total 4800 no's of plants already planted). Greenbelt photographs are attached Refer to annexure -18.
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VIII.Safety, Public hearing and Human health issues:

1	Emergency preparedness plan based on the hazard identification and risk assessment (HIRA) and disaster management plan shall be implemented.	Complied. The risk Assessment(HIRA) has been included in on-site emergency plan.
2	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Firefighting system shall be as per the norms.	Complied. 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.
3	The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.	Complied. Various types of PPE are maintained and distributed to workers on regular basis.
4	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.	Complied. A. HSE induction and fresher training imparted to employees and workers. Training organized through Annual HSE Training Calendar. Training records are being maintained. B. 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.
5	Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.	The condition is not applicable, We are using precast concrete parts like, concrete beams, columns, walls, roofs for construction.
6	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Complied. 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.
7	There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.	Complied. We have provided of dedicated area for raw material, solvent tanks and finished products vehicles.

IX. Corporate Environment Responsibility:

1.	The project authorities shall undertake activities under Corporate Environment Responsibility (CER) with a total cost of not less than Rs. 56 Lakhs towards Providing facilities to the Govt. Hospital for Pandemic diseases control, Medical and Health facilities in villges adjacent to the Industrial area- kolhar Village and Development of Papanashini Lake within 5 year in accordance with the O.M. F. No.22-65/ 2017-IA.III dated 01st May 2018 and report be submitted to the Authority.	Complied and on-going. There's good traction with the livelihood program, where the programs are reached to surrounding villages. For full details refer to annexure –19.
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2.	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. The company shall have defined system of reporting 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.	Complied. Organization has well laid down Health, Safety & Environmental policy duly approved by its Chairman and Managing director &CEO. Refer to annexure – 20.
3.	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 will directly to the head of the organization.	Complied A separate Health, Safety & Environmental (HSE) management cell being established. Organogram are attached. Refer to annexure – 21.
4.	Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company 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.	Complied a. We have allocated budget for Environment, health & Safety. b. Monthly allocated budget and purchase details. For full details refer to annexure-22. c. We had taken several environmental management programs. For full details refer to annexure-22.
5.	Self-environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.	Complied. Self-environment audit was conducted on 13-July-2021 to 15-July -21, for full details refer to Annexure-23.

X.Miscellaneous:

1.	Effort shall be made to replace Hexane, Toluene and Bromine by alternatives as per the SEAC condition.	Noted. And will be followed.
2.	The project proponent shall make public the environmental clearance granted for their project along with the environmental conditions and safeguards at their cost by prominently advertising it at least in two local newspapers of the District or State, of which one shall be in the vernacular language within seven days and in addition this shall also be displayed in the project proponent's website permanently.	Complied. Paper advertisement given on 01-October-2020 in Regional language and English language news papers. Refer to annexure – 24.
3.	The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to	Complied. Intimated to KSPCB-RO office, MOEF office, Member secretary-SEIAA regarding

Environmental Clearance No. SEIAA - 36 IND 2020, Dtd: 28-August-2020.
Compliance report of EC Condition from October-2022 to March-2023.



	display the same for 30 days from the date of receipt.	obtaining new EC. Acknowledgement copies are attached. Refer to annexure – 25.
4.	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and update the same on half-yearly basis.	Noted and being followed.
5.	The project proponent shall monitor the criteria pollutants level namely; PM 10, SO ₂ , NO _x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects and display the same at a convenient location for disclosure to the public and put on the website of the company.	Complied 1. AAQMS & S Stack emissions are monitored through approved laboratories and reports are submitted to KSPCB regional office on monthly basis. 2. A Display board of ambient air quality /Stack emission monitoring reports are displayed at the main gate. 3. Uploaded on the company website, which is updated every six months. Refer to annexure – 1 & 3
6.	The project proponent shall submit six-monthly reports on the status of the compliance of the stipulated environmental conditions on the website of the ministry of Environment, Forest and Climate change at environment clearance portal.	Noted and being followed.
7.	The HYCRs with its contents of a covering letter, compliance reports, and environmental monitoring data has to be in PDF format merged in to a single document. The email should be clearly mention the name of project, EC No & date, period of submission and to be sent to the Regional Office of MOEF&CC by email only at email ID rosz.bng-mefcc@gov.in Hard copy of HYCRs shall not be acceptable".	Noted and being followed.
8.	The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.	Noted and being followed.
9.	The project proponent 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, commencing the land development work and start of production operation by the project.	Noted and shall follow the same as per the MOEF / PCB rules and guidelines.
10.	The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.	Noted and shall follow the same as per the MOEF / PCB rules and guidelines.
11.	The project proponent shall abide by all the commitments and recommendations made in the EIA/ EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.	Noted and being followed.

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Compliance report of EC Condition from October-2022 to March-2023.**



12.	No further expansion or modifications in the plant shall be carried out without prior approval of this Authority or the Ministry of Environment, Forests and Climate Change (MOEF & CC).	Noted and shall follow the same as per the MOEF / PCB rules and guidelines.
13.	Concealing factual data or submission of false/ fabricated data may result in revocation of this environmental clearance and attract action under the provisions of Environment (Protection) Act, 1986.	Noted.
14.	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted.
15.	The SEIAA reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.	Noted and shall follow the same as per the MOEF / PCB rules and guidelines.
16.	The Regional Office of MOEF&CC shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data/ information/ monitoring reports.	Noted and being followed.
17.	The above conditions shall be enforced, inter-alia under the provisions of the water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention and control of pollution) Act, 1981, the Environment (Protection) Act, 1986, hazardous and other wastes (Management and Trans boundary 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.	Noted.
18.	Any appeal against this EC 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.	Noted.
19.	The project proponent shall adopt and comply all the mechanism included by the MOEF&CC which is given in the Annexure-I and shall be abide by the conditions there on. The project proponent shall undertake all necessary steps to bring down the CEPI score of the industrial area and the improve the environment condition in accordance with the mechanism evolved by MOEF & CC.	Noted and will be complied.

ANNEXURE-II

Additional condition as per the Mechanism evolved by MOEF&CC as compliance to the orders of Honorable NGT dated 19-August-2019 in OA No.1038 of 2018.

Environment Mitigation Measures

A. Air :

Stipulation of condition such as :		
1.	Stack emission levels should be stringent than the existing	Complied.

	standards in terms of the identified critical pollutants.	<p>A. Our Boiler works on fluidized bed technology for effective combustion and has pulsating fiber glass filters for efficient emission control (SPM< 100 mg/Nm³).</p> <p>B. Cyclone separator installed followed by the bag filter and stack height is in line with norms.</p> <p>Refer to annexure – 4.</p>
2.	CEMS may be installed in all large/medium red category industries (air polluting) and connected to SPCB and CPCB server.	<p>Noted.</p> <p>1. Installed online continuous stack emission monitoring system (CSEMS) for Boiler stack, this real time data connected to KSPCB/CPCB server.</p> <p>2. We are being submitted reports to KSPCB regional office on monthly basis of boiler stack SPM (mg/Nm³) Minimum, Maximum, Average values.</p> <p>Refer to annexure-1.</p>
3.	Effective fugitive emission control measures should be imposed in the process, transportation, packing etc.	<p>Complied.</p> <p>Adequate control measure are available for minimizing the fugitive emission from all the vulnerable sources.</p> <p>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.</p> <p>B. All our critical manufacturing operation are carried out through closed system and the reactors also are equipped with primary and secondary condensers with RT water or +5°C chilled water utility to prevent emission of Vocs.</p> <p>Refer to annexure -15.</p>
4.	Transportation of materials by rail/conveyor belt, wherever feasible.	<p>Complied.</p> <p>The loading of coal to boiler. The coal is transferred to boiler using closed conveyor belt.</p> <p>Refer to annexure – 5.</p>
5.	Encourage use of cleaner fuels (pet coke/furnace oil/LSHS may be avoided).	<p>Noted.</p> <p>It will be followed.</p>
6.	Best Available Technology may be used. For example; usage of EAF/SAF/IF in place of Cupola furnace. Usage of Supercritical technology in place of sub-critical technology.	<p>Noted.</p> <p>It will be followed.</p>

7.	Increase of green belt cover by 40% of the total land area beyond the permissible requirement of 33 %, wherever feasible.	<p>Complied.</p> <p>33.5% of the total available area is converted into Green belt area. Going forward to 40% of green belt as per the additional conditions regarding increasing the green belt area to 40% wherever feasible stipulated by MOEF&CC, GOI dated 24-10-2019, we have taken steps to improve our green belt area by earmarking additional lands for plantation and green cover.</p> <p>Following are the activities undertaken with regards to same:</p> <ol style="list-style-type: none"> 1. Extending of green belt in existing area of 6.3 acre (Sy.No 280). 2. Development of green belt in 0.5 acre (Plot No.130A) site 3. Plantation along the boundary wall adjacent to main road near to ZLDS plant. 4. Development of green cover 2.5 acres in lease land as part of social forestry initiative. <p>Development of greenbelt in & around the plant (Total 4500 no's of plants already planted). Greenbelt photographs are attached. Refer to annexure -18.</p>
8.	Stipulation of greenbelt outside the project premises such as avenue plantation, plantation in vacant areas, social forestry, etc,	Noted and will be complied.
9.	Assessment of carrying capacity of transportation load on roads inside the industrial premises. If the roads required to be widened, shall be prescribed as a condition.	Noted.

B. Water:

Stipulation of condition such as :		
1.	Reuse/recycle of treated waste water, wherever feasible.	<p>Complied.</p> <p>Recycled water is being used in cooling towers as make up water.</p>
2.	Continuous monitoring of effluent quality/quantity in large and medium Red Category Industries (water polluting)	<p>Complied.</p> <p>The strong dedicated team manage the effluent in efficient manner on daily.</p> <p>The standard operation procedure is in place for management of effluent and all employees of ETP are trained on the procedure. As per the procedure in house Discharge ion logbook is maintained as record. Preventive maintenance schedule is defined for all equipment's of ETP and maintenance is carried out at regular</p>

		intervals by trained professionals.
3.	A detailed water harvesting plan may be submitted by the project proponent	<p>Complied.</p> <p>Rain water management :</p> <p>A. Storm water shall not be allowed to mix with effluent and floor washing.</p> <p>B. Spill kits are provided across all the plants. Dyke walls /curb walls are provided wherever required towards secondary containment.</p> <p>C. All the site walkways & building pathways at site are provided with uniform sloping to drive the water towards the drainages & storm drain system.</p> <p>C. All the building constructed at site are provided with uniform sloping at the roof to drive the water towards the draining & catch basins.</p> <p>D. We have provided adequate rainwater storage tank.</p> <p>E. The rainwater used to utilities as makeup.</p>
4.	Zero liquid discharge wherever Techno Economically feasible	<p>Noted and being followed.</p> <p>we are following the highest standards of environmental management. We have systematic method for collection and treatment of all types of effluent. Our facility is equipped with Zero Liquid Discharge (ZLDS).</p> <p>The ZLDS facility includes following components:</p> <p>A. Stripper</p> <p>B. Multiple Effect Evaporator (MEE)</p> <p>C. Agitated Thin Film Dryer (ATFD)</p> <p>D. Primary & biological treatment</p> <p>E. Reverse Osmosis (RO) system.</p> <p>The tanks are provided with impervious acid proof lining to prevent any kind of spillage of effluent. The collected effluent is transferred to treatment facility through closed transfer system provided with SS / HDPE / rigid pipelines, compatible gaskets for pipeline and flange guard provided for HCL pipeline.</p> <p>The entire area of ETP facility is provided with hard flooring and acid resistance impervious lining for hazard operation areas and leak prevention. All the collection tanks and the ETP area is provided with adequate secondary containment to prevent any spills leaking into the environment. We have in-house ETP</p>

		laboratory and the effluent generated are analyzed for quality parameters in this lab. ZLDS facility photographs are attached. Refer to annexure -26.
5.	In case, domestic waste water generation is more than 10 KLD, the industry may install STP.	Complied. We have installed Sewage treatment plant (STP) and the domestic effluent is being treated in STP. STP plant and flow scheme attached as Annexure-27.

C.Land:

Stipulation of condition such as :		
1.	Increase of green belt cover by 40% of the total land area beyond the permissible requirement of 33%, wherever, feasible for new projects.	Complied. 33.5% of the total available area is converted into Green belt area. Going forward to 40% of green belt as per the additional conditions regarding increasing the green belt area to 40% wherever feasible stipulated by MOEF&CC, GOI dated 24-10-2019, we have taken steps to improve our green belt area by earmarking additional lands for plantation and green cover. Following are the activities undertaken with regards to same: 1. Extending of green belt in existing area of 6.3 acre (Sy.No 280). 2. Development of green belt in 0.5 acre (Plot No.130A) site 3. Plantation along the boundary wall adjacent to main road near to ZLDS plant. 4. Development of green cover 2.5 acres in lease land as part of social forestry initiative. Development of greenbelt in & around the plant (Total 4800 no's of plants already planted). Greenbelt photographs are attached Refer to annexure -18.
2.	Stipulation of greenbelt outside the project premises such as avenue plantation, plantation in vacant areas, social forestry, etc.	Noted and will be complied.
3.	Dumping of waste (fly ash, slag, red mud, etc.) may be permitted only at designated locations approved by SPCBs/ PCCs.	Noted and will be followed.
4.	More stringent norms for management of hazardous waste. The waste generated should be preferably utilized in co-	Noted and being followed.

	processing.	
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D.Other Condition (Additional)

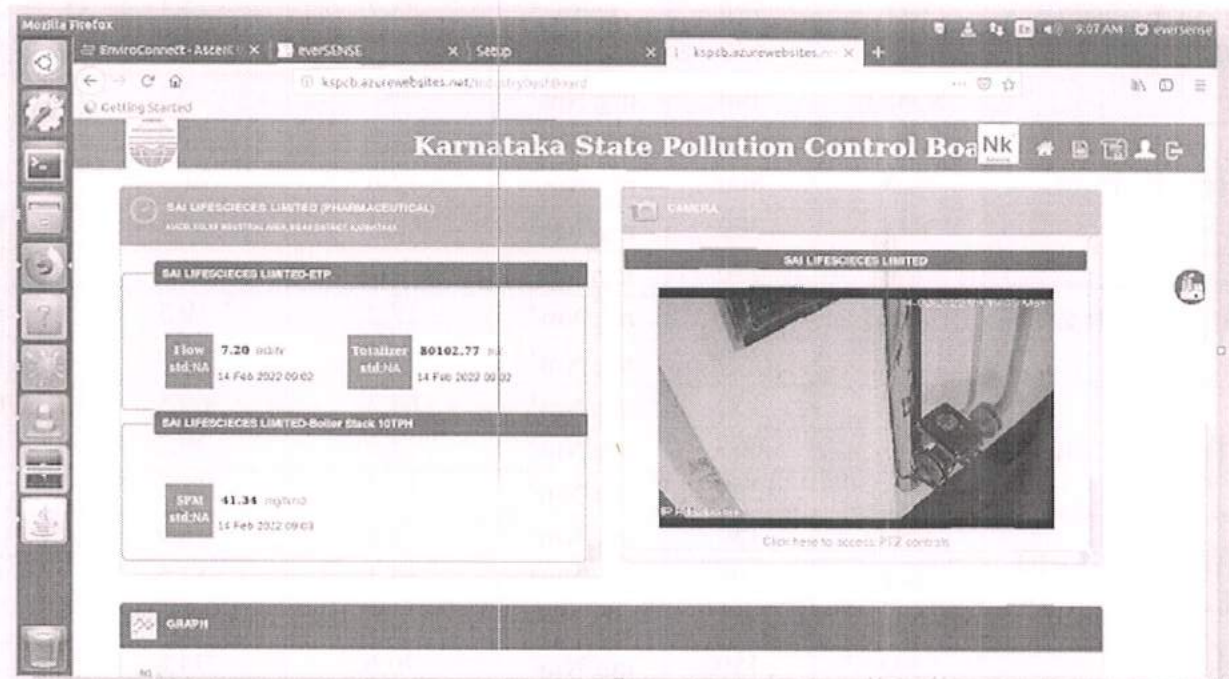
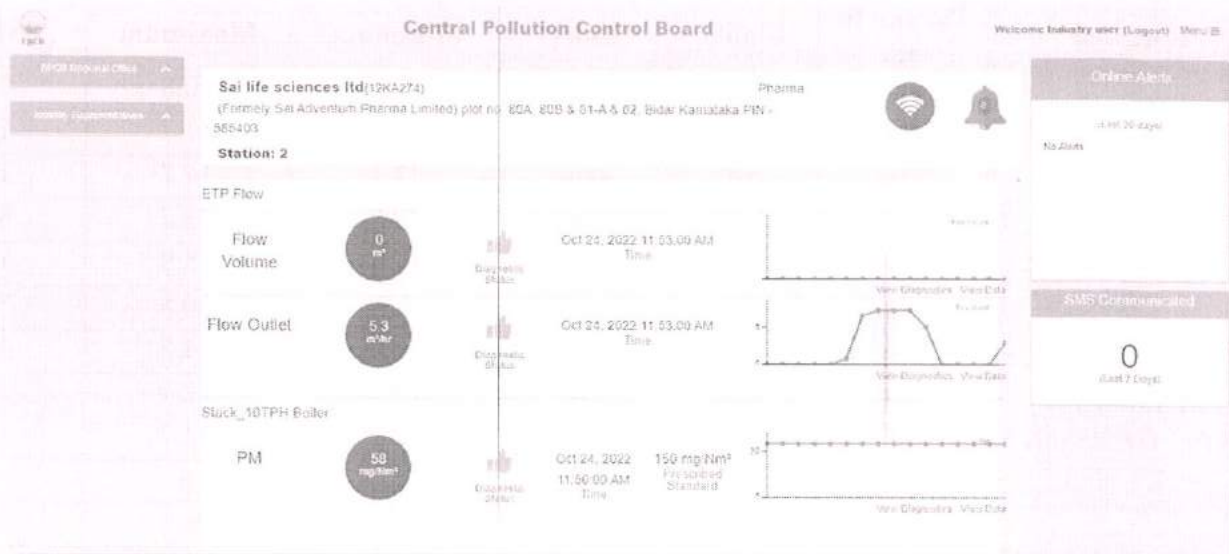
1.	Monitoring of compliance of EC conditions may be submitted with third party audit every year.	Noted. And will be followed.
2.	The % of the CER may be at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental Clearance.	Noted

List of Annexures

Sr. No	Description	Annexure No
1	Web portal Screenshot for KSPCB / CPCB live data streaming & Calibration reports of OCEMS system and stack emission monitoring report.	Annexure - 1
2	Fugitive emission monitoring reports	Annexure - 2
3	Ambient air quality monitoring report	Annexure - 3
4	Cyclone separator and bag filter & Stack emission monitoring report and Boiler coal Sulphur content report.	Annexure - 4
5	Dedicated coal storage shed, water mist system and closed conveyor system.	Annexure - 5
6	Web portal screenshot for CPCB and KSPCB live data streaming.	Annexure - 6
7	Treated effluent analysis reports.	Annexure - 7
8	Ground water extraction NOC	Annexure - 8
9	Secondary containment & Rainwater collection tank.	Annexure - 9
10	DG sets stacks.	Annexure - 10
11	DG sets acoustic enclosure	Annexure - 11
12	Noise level monitoring report from October-2022 to March-2023	Annexure - 12
13	Solvent storage tank farm area, Foam flooding system, Nitrogen blanketing system and Breather valve.	Annexure - 13
14	Reactor sampling device and Drum booth charging.	Annexure - 14
15	PTS, Glove box and DCS.	Annexure - 15
16	Double condenser and Vent condenser system.	Annexure - 16
17	High pressure water jet machine.	Annexure - 17
18	Greenbelt photographs.	Annexure - 18
19	Corporate Environment Responsibility (CER)	Annexure - 19
20	Health, Safety & Environmental policy.	Annexure - 20.
21	Environmental (HSE) management cell organogram.	Annexure - 21.
22	Monthly allocated budget details and Environment management programs.	Annexure - 22.
23	Self-environment audit	Annexure - 23.

24	Paper advertisement.		Annexure – 24.
25	Intimated to KSPCB-RO office, regarding obtaining new EC-Acknowledgement copy.		Annexure – 25
26	ZLDS facility photographs.		Annexure – 26.
27	STP plant and flow scheme.		Annexure – 27

Annexure-1
Web portal screenshot for KSPCB/CPCB live data streaming



Annexure-1

Stack emission monitoring reports.

Stack Emission Monitoring Reports from October- 2022 to March-2023						
Location	Parameters	Limits	Units	Minimum	Maximum	Average
500 KVA DG SET	PM	150	mg/Nm ³	77.3	80.8	78.5
	SO ₂	100	mg/Nm ³	11.1	11.7	11.3
	NO _x	50	ppm	12.1	14.7	13.8
750 KVA DG SET	PM	150	mg/Nm ³	79.3	83.7	82.2
	SO ₂	100	mg/Nm ³	13.4	15.9	14.3
	NO _x	50	ppm	8.2	10.5	9.7
DG SET-1010 KVA-1 (DDGS-07)	PM	75	mg/Nm ³	41.8	44.5	43.2
	NO _x	710	ppm	19.2	22.4	20.8
	CO	150	mg/Nm ³	12.6	13.7	13.2
	NMHC	100	mg/Nm ³	5	6	5.5
DG SET-1010 KVA-2 (DDGS-08)	PM	75	mg/Nm ³	43.9	46.1	45.0
	NO _x	710	ppm	18.8	20.5	19.7
	CO	150	mg/Nm ³	13.4	15.4	14.4
	NMHC	100	mg/Nm ³	5	7	6.0
DG SET-2250 KVA (DDGS-09)	PM	75	mg/Nm ³	44.4	47.7	46.1
	NO _x	710	ppmv	23.7	25.1	24.4
	CO	150	mg/Nm ³	11.3	14.5	12.9
	NMHC	100	mg/Nm ³	6	7	6.5
5 TPH BOILER	PM	150	mg/Nm ³	72.8	79.8	75.8
	SO ₂	600	mg/Nm ³	12.6	21.3	16.2
	NO _x	300	mg/Nm ³	12.3	17.5	15.5
10 TPH BOILER	PM	150	mg/Nm ³	70.1	77.2	72.9
	SO ₂	600	mg/Nm ³	17.2	19.5	18.4
	NO _x	300	mg/Nm ³	12.1	16.9	14.3
2 TPH BOILER	PM	150	mg/Nm ³	64.2	69.5	67.0
	SO ₂	600	mg/Nm ³	11.6	19.2	15.3
	NO _x	300	mg/Nm ³	11.7	16.5	13.9
THERMIC FLUID HEATER-1	PM	150	mg/Nm ³	72.8	76.9	74.9
	SO ₂	100	mg/Nm ³	14.1	17.5	15.8
	NO _x	50	mg/Nm ³	11.4	12.9	12.2
THERMIC FLUID HEATER-2	PM	150	mg/Nm ³	70.6	74.8	72.7
	SO ₂	100	mg/Nm ³	14.3	16.2	15.3
	NO _x	50	mg/Nm ³	10.2	12.7	11.5

Scrubber emission monitoring reports from Oct- 2022 to Mar-2023

Location	Scrubber ID No's	Parameter	Limits	Units	Minimum	Maximum	Average
PB-1	DSCR-01	Acid mist	35 Max	mg/Nm ³	18.7	26.2	21.07
PB -3 & PB-2	DSCR-14	Acid mist	35 Max	mg/Nm ³	20.4	24.3	22.77
PR&D	DSCR-19	Acid mist	35 Max	mg/Nm ³	23.6	28.4	25.78
PR&D	DSCR-20	Acid mist	35 Max	mg/Nm ³	20.5	26.3	24.22
PB -4	DSCR-04	Acid mist	35 Max	mg/Nm ³	18.9	22.6	20.98
PB -4	DSCR-05	Acid mist	35 Max	mg/Nm ³	20.3	25.3	23.57
PB -6	DSCR-21	Acid mist	35 Max	mg/Nm ³	19.2	23.8	21.90
PB -6	DSCR-06	Acid mist	35 Max	mg/Nm ³	21.5	26.6	23.67
PB -6	DSCR-07	Acid mist	35 Max	mg/Nm ³	20.1	25.9	23.08
PB -6	DSCR-02-01	Acid mist	35 Max	mg/Nm ³	21.5	27.4	24.42
PB -7	DSCR-09	Acid mist	35 Max	mg/Nm ³	18.1	27.4	22.27
PB -7	DSCR-10	Acid mist	35 Max	mg/Nm ³	20.2	27.1	23.95
PB -7	DSCR-11	Acid mist	35 Max	mg/Nm ³	19.3	25.2	21.77
PB -7	DSCR-12	Acid mist	35 Max	mg/Nm ³	21.9	25.8	24.35
PB -8	DSCR-16	Acid mist	35 Max	mg/Nm ³	21.3	27.1	24.70
PB -8	DSCR-17	Acid mist	35 Max	mg/Nm ³	23.6	28.3	26.30
QC	DSCR-27	Acid mist	35 Max	mg/Nm ³	21.5	27.8	24.38
Were house	DSCR-18	Acid mist	35 Max	mg/Nm ³	22.4	28.7	24.64
Were house	DSCR-08	Acid mist	35 Max	mg/Nm ³	22.3	28.2	25.54
Were house	DSCR-13	Acid mist	35 Max	mg/Nm ³	23.6	26.8	25.08
ETP	DSCR-22	Acid mist	35 Max	mg/Nm ³	22.1	26.4	24.90
PB-09	DSCR-23	Acid mist	35 Max	mg/Nm ³	19.8	27.9	23.52
PB-10	DSCR-24	Acid mist	35 Max	mg/Nm ³	20.8	28.8	24.80

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PREMIER ANALYTICAL LABORATORIES

(Environment Monitoring & Minerals Testing Services)

ISO 9001 : 2015, ISO 45001 : 2018 Certified Laboratory

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Amaravathi, HOSAPETE - 583 201, Ballari Dist., Karnataka.

Tel. : 08394 - 228683 / email : premierlabhpt@gmail.com

ANALYSIS REPORT OF AMBIENT AIR QUALITY

Test Report No: PAL/HPT/390/W/RND/2022	Report Date: 15/03/2023
Name of the Industry	M/s. Sai Life Sciences Limited, Unit-4, 80-A, 80-B, 81-A & 82, Kolhar Industrial Area, Bidar-585403
Particulars of the sample	Instrument Method
Sample Collected By	BY US
Date of Collection	08/03/2023, 09/03/2023 & 10/03/2023
Analysis Start Date	11/03/2023
Analysis Completion Date	15/03/2023
Name of the Parameter	Total Volatile Organic Compounds

RESULTS

SL.NO	Description of equipment	Location	Result In PPM
1	Near DGLR03	PB-01	3.00
2	Near DVS71	PB-02	2.00
3	Near DSCR-04	PB-04	2.00
4	Near DSSR45	PB-06	2.00
5	Near DAGV03	PB-07	3.00
6	Near DSSR24-2	PB-07	4.00
7	Near DSCR-11	PB-07	2.00
8	Near Solvent storage tanks	PB-08	4.00
9	Near DSCR-16	PB-08	2.00
10	Near DVS81	PB-08	3.00

Checked by

29-Mar-2023

Authorised Signatory

Note : 1. The result listed above pertain only to the tested samples & applicable parameters. 2. Total liability of our Laboratory is limited to the Invoice amount. 3. This report is not to be reproduced either wholly or in part and cannot be used as evidence in



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Tel. : 08394 - 228683 / email : premierlabhpt@gmail.com

TEST REPORT

ANALYSIS REPORT OF FUGITIVE EMISSION

Name of the Industry	M/s. Sai Life Sciences Limited, Unit-4, 80-A, 80-B, 81-A & 82, Kolhar Industrial Area, Bidar-585403
Particulars of the sample	Sample collected with High Volume Sampler
Sample Collected By	Enviro Consultancy Kalaburgi
Date of Collection	09/03/2023
Report No	AA-800
Analysis Start Date	10/03/2023
Analysis Completion Date	11/03/2023
Method Adopted	IS-5182(Part4)-1999
Name of the Parameter	Suspended Particulate Matter

SI NO	Name of the Location	Duration of Monitoring	Unit	Result*
1	Near Boiler Dust	24 Hours	µg/m ³	250

End of the Report

Checked by

(Signature)

29-Mar-2023

(Signature)
Authorised Signatory

Note : 1. The result listed above pertain only to the tested samples & applicable parameters. 2. Total liability of our Laboratory is limited to the Invoice amount. 3. This report is not to be reproduced either wholly or in part and cannot be used as evidence in

Annexure-3
Ambient Air Quality monitoring reports

Ambient air quality monitoring reports from Oct- 2022 to Mar-2023

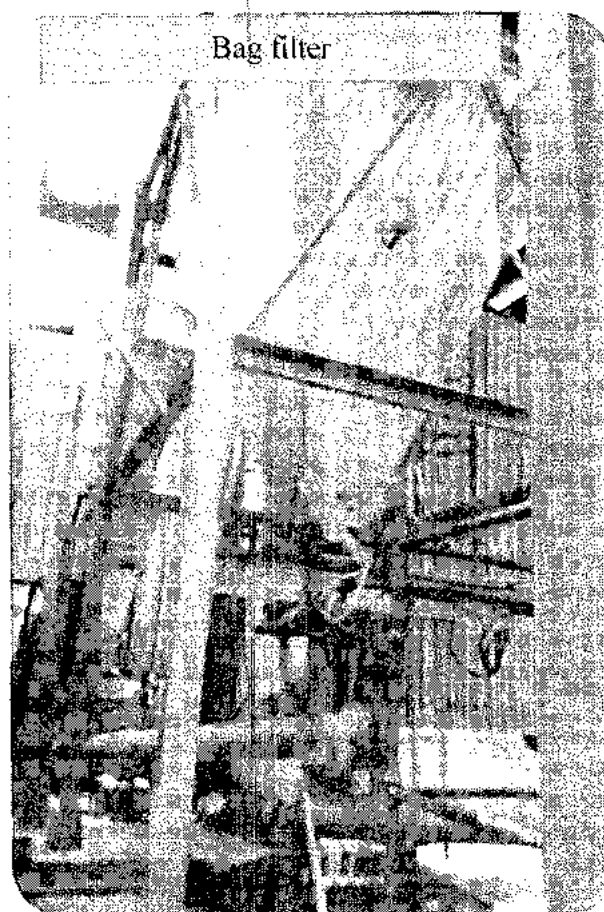
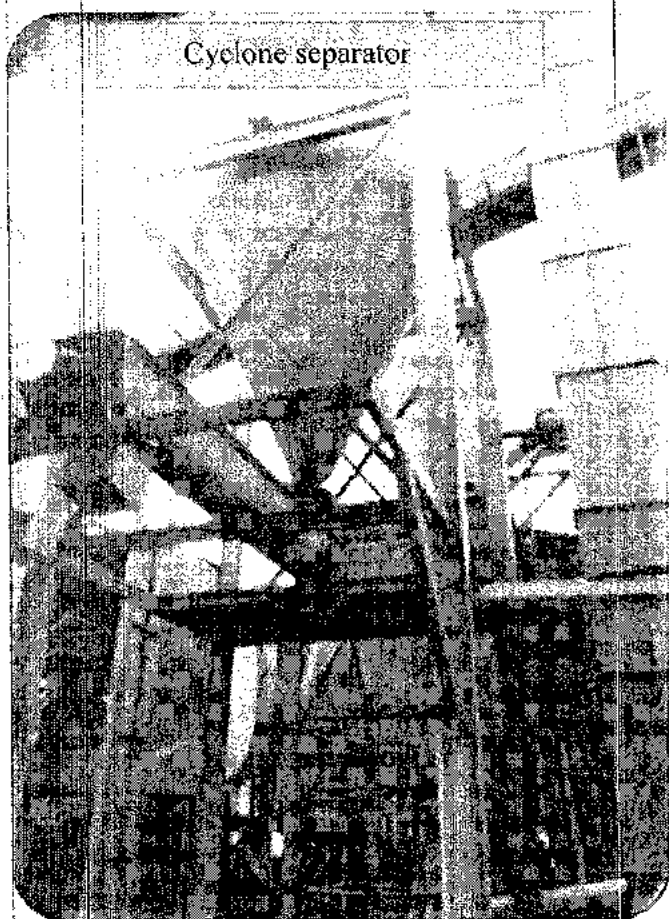
Location	Parameters	Units	NAAQ Standards	Minimum	Maximum	Average
Location -1 Near main gate security area	PM 10	µg/m ³	100	66	79	71
	PM 2.5	µg/m ³	60	19	24	22
	SO ₂	µg/m ³	80	8	13	11
	NO ₂	µg/m ³	80	11	14	12
	Carbon Monoxide(CO)	mg/m ³	2.0	0	1	0
	Lead (Pb)	µg/m ³	1.0	0	1	1
	Arsenic(As)	ng/m ³	6.0	BDL	BDL	BDL
	Nickel(Ni)	ng/m ³	20.0	BDL	BDL	BDL
	Ozone(O ₃)	µg/m ³	100	7	9	8
	Ammonia(NH ₃)	µg/m ³	400.0	8	9	8
	Benzene(C ₆ H ₆)	µg/m ³	5.0	BDL	BDL	BDL
	Benzo(a),pyrene (Bap)	ng/m ³	1.0	BDL	BDL	BDL
Location -2 Near warehouse	PM 10	µg/m ³	100	64	71	67
	PM 2.5	µg/m ³	60	18	21	19
	SO ₂	µg/m ³	80	8	14	11
	NO ₂	µg/m ³	80	11	16	14
	Carbon Monoxide(CO)	mg/m ³	2.0	1	1	1
	Lead (Pb)	µg/m ³	1.0	0	1	0
	Arsenic(As)	ng/m ³	6.0	BDL	BDL	BDL
	Nickel(Ni)	ng/m ³	20.0	BDL	BDL	BDL
	Ozone(O ₃)	µg/m ³	100	7	10	8
	Ammonia(NH ₃)	µg/m ³	400.0	8	9	9
	Benzene(C ₆ H ₆)	µg/m ³	5.0	BDL	BDL	BDL

	Benzo(a),pyrene (Bap)	ng/m ³	1.0	BDL	BDL	BDL
Location -3 Near ETP & Boiler area	PM 10	µg/m ³	100	71	82	76
	PM 2.5	µg/m ³	60	18	25	22
	SO ₂	µg/m ³	80	12	14	13
	NO ₂	µg/m ³	80	12	15	13
	Carbon Monoxide(CO)	mg/m ³	2.0	0	1	1
	Lead (Pb)	µg/m ³	1.0	1	1	1
	Arsenic(As)	ng/m ³	6.0	BDL	BDL	BDL
	Nickel(Ni)	ng/m ³	20.0	BDL	BDL	BDL
	Ozone(O ₃)	µg/m ³	100	7	9	8
	Ammonia(NH ₃)	µg/m ³	400.0	6	8	8
	Benzene(C ₆ H ₆)	µg/m ³	5.0	BDL	BDL	BDL
	Benzo(a),pyrene (Bap)	ng/m ³	1.0	BDL	BDL	BDL
Location -4 Near PB-09	PM 10	µg/m ³	100	64	77	71
	PM 2.5	µg/m ³	60	20	24	21
	SO ₂	µg/m ³	80	11	15	13
	NO ₂	µg/m ³	80	13	14	13
	Carbon Monoxide(CO)	mg/m ³	2.0	1	1	1
	Lead (Pb)	µg/m ³	1.0	1	1	1
	Arsenic(As)	ng/m ³	6.0	BDL	BDL	BDL
	Nickel(Ni)	ng/m ³	20.0	BDL	BDL	BDL
	Ozone(O ₃)	µg/m ³	100	7	10	8
	Ammonia(NH ₃)	µg/m ³	400.0	8	9	9
	Benzene(C ₆ H ₆)	µg/m ³	5.0	BDL	BDL	BDL
	Benzo(a),pyrene (Bap)	ng/m ³	1.0	BDL	BDL	BDL

Annexure-4

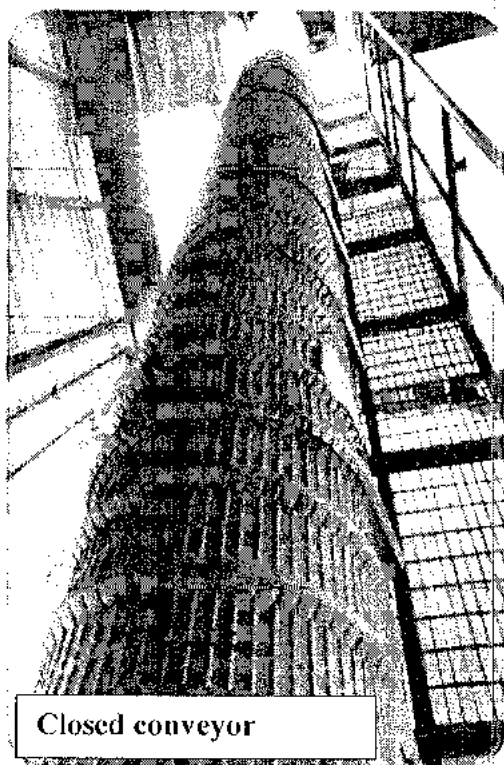
Cyclone separator and Bag filter & Stack Monitoring Report and Boiler coal Sulphur content report.

Boiler Stack Emission Monitoring Reports from Oct- 2022 to Mar-2023					
	Location	Parameters	Minimum	Maximum	Average
10 TPH BOILER		PM	70.1	77.2	72.9
		SO ₂	17.2	19.5	18.4
		NO _x	12.1	16.9	14.3

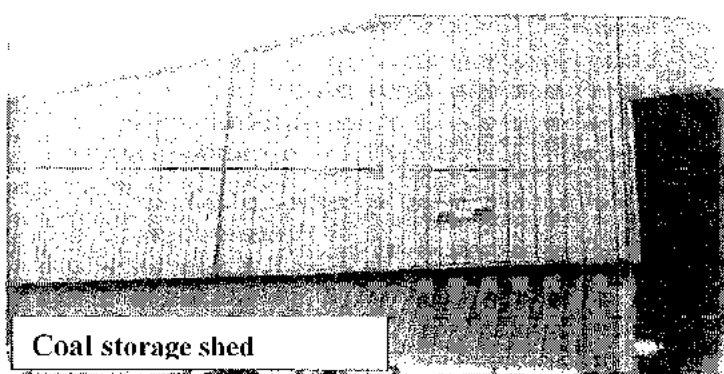


Annexure-5

Dedicated coal storage shed, water mist system and closed conveyor system



Closed conveyor



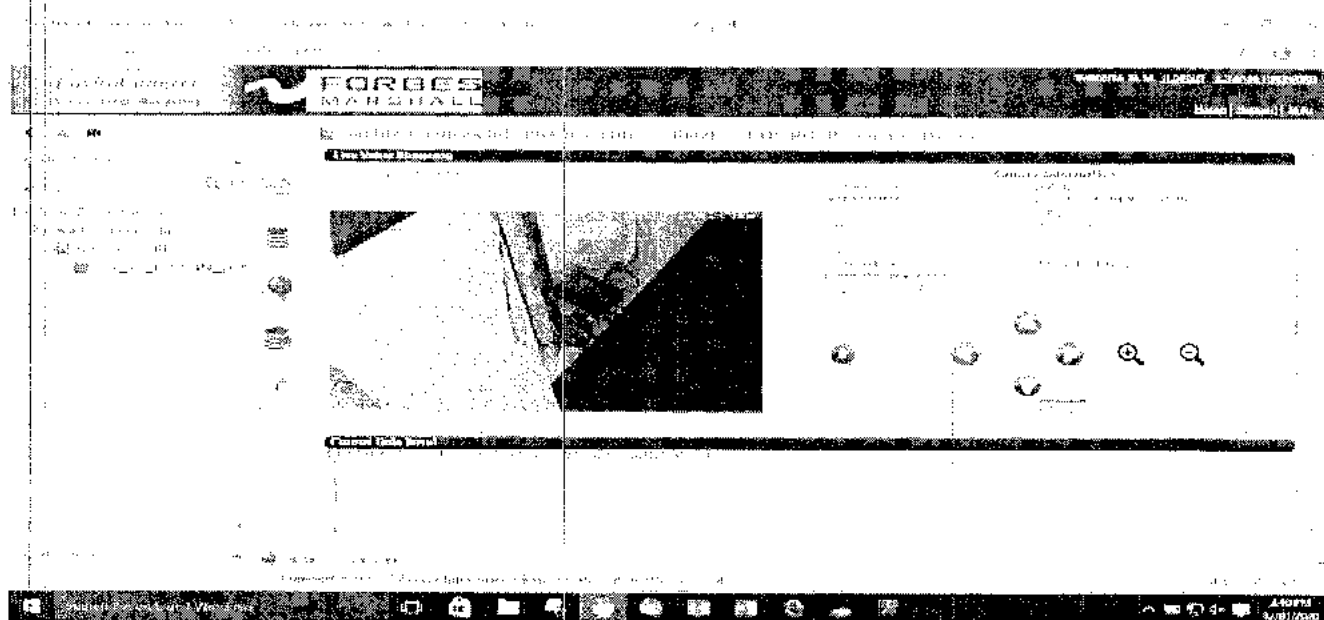
Coal storage shed

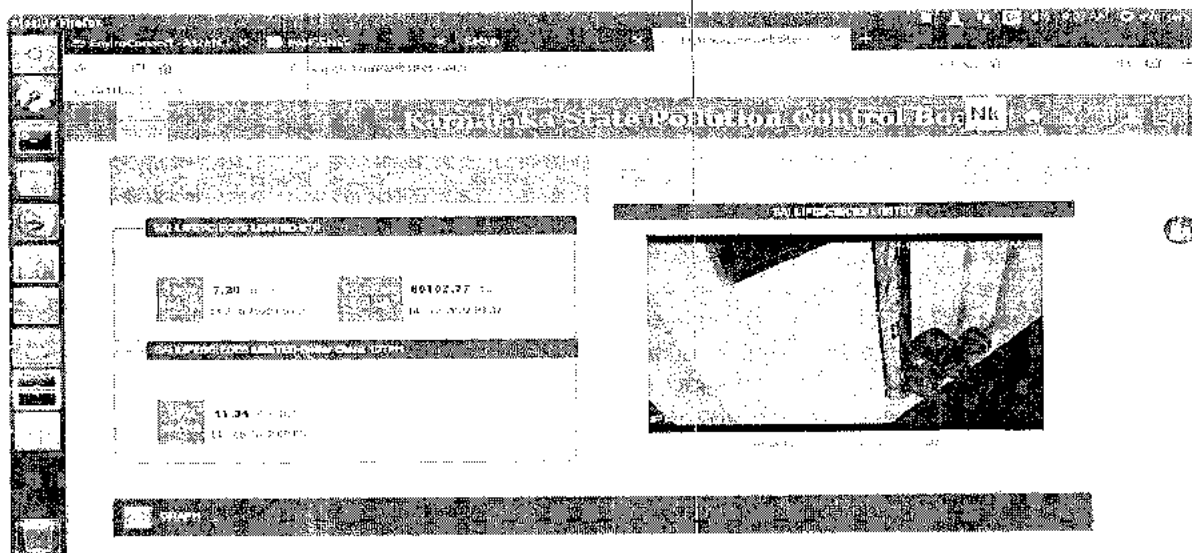


Water mist

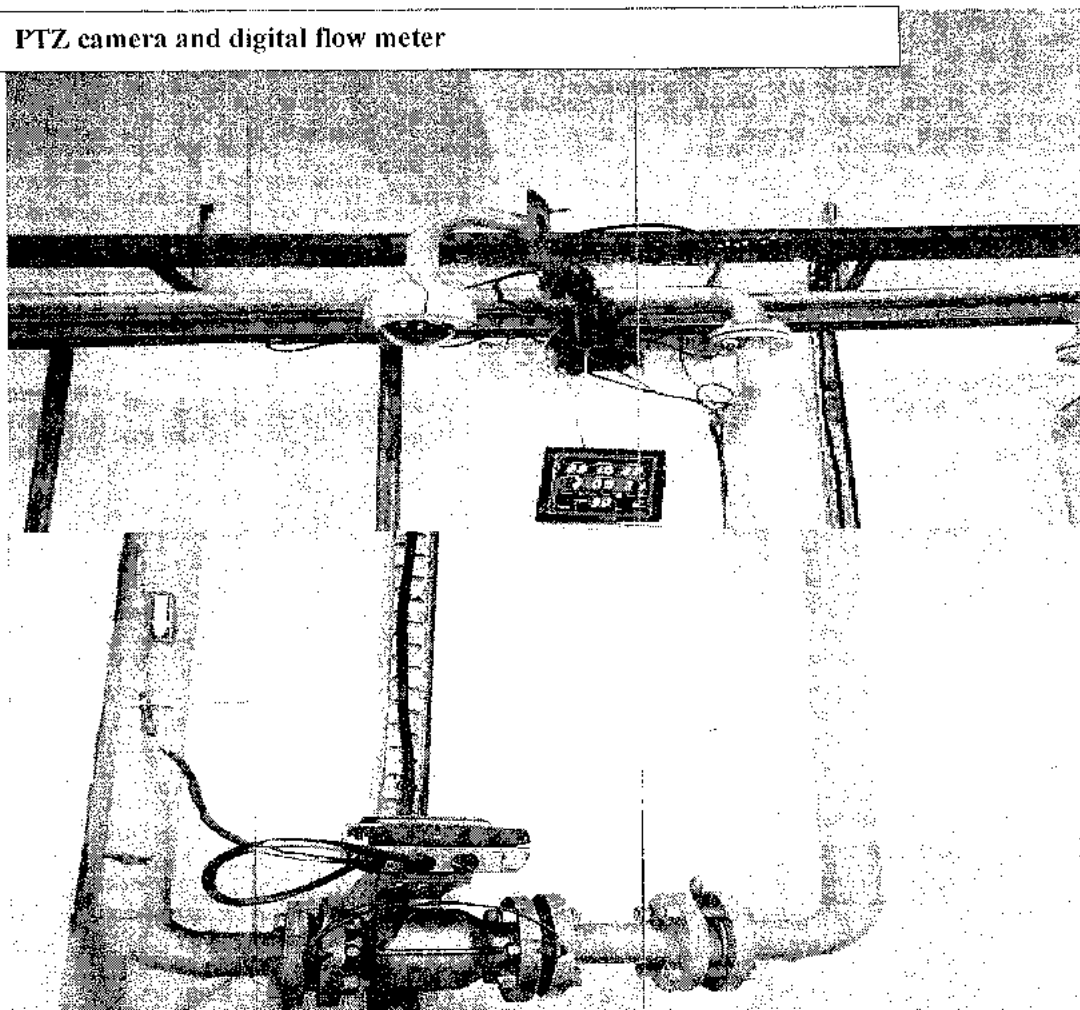
Annexure-6

Web portal Screenshot for CPCB and KSPCB live data streaming





PTZ camera and digital flow meter



Annexure-7

Treated effluent (RO-Permeate) analysis report from October- 2022 to March-2023

Treated effluent (RO-Permeate) analysis report						
Name of sample	Parameters	Units	Limits	Minimum	Maximum	Average
Treated effluent (RO-Permeate)	pH	—	6 -8.5	7.2	7.7	7.45
	Chemical Oxygen Demand	PPM	250	23	86	63.17
	Biological Oxygen Demand for 3 days at 27°C	PPM	30	10	21	14.83
	Ammonical Nitrogen	PPM	100	37	53	44.83
	Total Suspended Solids	PPM	100	0	60	36.33
	Oil & Grease	PPM	10	Nil		
	Bioassay test	—	90% survival of fish after first 96 hours in 100% effluent	Pass		

Annexure – 8

Ground water extraction NOC