



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF ACTIVE PHARMACEUTICAL INGREDIENTS (API'S) & INTERMEDIATES

Works: 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P.) INDIA • Mobile : 9837473348

Postal Add : Ramji sadan, 494-95, Kambalwala Bagh, New Mandi
Muzaffarnagar-251001 (U.P.) INDIA 21st Nov., 2023

E-Mail : ratipushp@yahoo.com • Website : www.ratipushp.com in

To,

Dr. Preeti Tripathi,
Scientist'C',
Ministry of Environment, Forest and climate change,
Regional office (Central region),
Kendriya bhawan, 5th Floor, Sector-II,
Aliganj, Lucknow – 226024 – U.P.

Sub: Compliance status report (Apr-2023 – Sep-2023) as per Environmental Clearance for Drug Intermediates manufacturing Units at 8th km Jansath Road, Muzaffarnagar, Uttar Pradesh by M/s RATI PUSHP INTERMEDIATES Pvt. Ltd.

Respected Ma'am,

In view of the Environmental Clearance for the above mentioned project issued by the Ministry of Environment and Forests vide letter No. 191/parya-SEIAA/5667/2019 dt. 07/07/2020. The information along with the compliance status are given below –

1.	Status of Project work progress	:	Production has been started.
2.	Point wise compliance status to various stipulations, as laid down by the Ministry in the above cited letter, with supporting documents.	:	Enclosed as Exhibit – A Supporting documents enclosed as Exhibit – I to XXI
3.	Consent (Air/Water) to Operate from UPPCB, Lucknow	:	CTE & CTO Enclosed as Exhibit – XII
4.	Public Hearing document. (if any)	:	Already Included in EIA Report earlier.
5.	The copy of Advertisement for Public Hearing.	:	Copy of advertisement is already enclosed previously.

I request you to kindly consider the report. I will be highly thankful to you.

Thanking you,

Sincerely,

M/s RATI PUSHP INTERMEDIATES PVT. LTD.

(Managing Director)

Note - List of Enclosures on Next Page

ENCLOSURES:-

1.	Point wise compliance status.	Exhibit – A
2.	Certified Compliance report 12.04.2021 with reply letter to complete the compliance of discrepancies raised in the certified compliance.	Exhibit – I
3.	Photos for Floors and walls outside of the plant.	Exhibit – II
4.	Photos of Plantation and Green belt.	Exhibit – III
5.	Form – V for Annual Environment statement FY 2022-2023. CER Public Drinking water dispenser.	Exhibit – IV
6.	Flow Chart of E.T.P.	Exhibit – V
7.	Treated water testing report from ETP.	Exhibit – VI
8.	Record for Environmental Training program of employees.	Exhibit – VII
9.	NOC from UPGWD	Exhibit – VIII
10.	Appointment letter from Dr. Tara Mohan for regular health checkups of employees Medical fitness record of Employees.	Exhibit – IX
11.	Drug License UPFDA, Lucknow, U.P.	Exhibit – X
12.	Reply of the letter received from MOEF (Wildlife conservation Plan) dt. 22.02.2021	Exhibit – XI
13.	CTE & CTO from UPPCB, Lucknow, U.P.	Exhibit – XII
14.	Hazardous Waste Management NOC from UPPCB, Lucknow, U.P. waste authorization certificate and contract with Bharat oil and waste management ltd. Latest Form 6, 10 issued by Bharat Oil and waste management ltd.	Exhibit – XIII

15.	Air Monitoring Report	Exhibit – XIV
16.	Main gate display board showing all parameter for air, water, waste management etc.	Exhibit – XV
17.	Treated water testing report from ETP.	Exhibit - XVI
18.	Layout plan of Rain water harvesting.	Exhibit - XVII
19.	Environmental policy of Rati Pushp Intermediates Pvt. Ltd.	Exhibit - XVIII
20.	Ambient Noise level report.	Exhibit - IX
21.	Copy of Board of resolution for implementation of environmental policy.	Exhibit - XX
22.	Risk mitigation measures Plan & Disaster Management Plan.	Exhibit - XXI

EXHIBIT-A

RATI PUSHP INTERMEDIATES PVT. LTD.

8th Km Jansath Road, Muzaffarnagar, U.P. - 251001

Pointwise Compliance status report (Apr 2023 – Sep 2023)

For the conditions listed in the Environmental Clearance

letter No. 191/parya/SEIAA/5667/2019 dt. 07/07/2020

SPECIFIC CONDITIONS.

<u>S. No.</u>	<u>Conditions Listed in Environmental Clearance</u>	<u>Compliance Status</u>
1	Project proponent should submit the certified compliance report within 03 months with effective date of issuance of Environment Clearance letter. In case the project proponent fails to submit the same the EC shall automatically deemed to be cancelled.	The Certified Compliance report is attached as EXHIBIT-I .
2	In compliance to Hon'ble Supreme Court order dated 13/01/2020 in IA no. 158128/2019 and 158129/2019 in Writ petition no. 13029/1985 (MC Mehta Vs GM and others) anti-smog guns shall be installed to reduce dust during excavation.	Anti-Smog gun is NOT INSTALLED, because of being a small-scale Pharmaceutical bulk drugs plant. Total land floor area with all walls (both indoor and outdoor) has been installed with tiles and granite to avoid any type of dust and there is no excavation activity involved in the plant. Photo of Plant Flooring walls is attached as EXHIBIT-II
3	Directions/suggestions given during public hearing and commitment made by the project proponent should be strictly complied.	The Project Proponent is strictly complying to suggestions given during public hearing and commitment.
4	Since the proposed project falls in Critically Polluted Areas (CPAs) Severely Polluted Areas (SPAS) the provision of the mechanism framed regarding compliance of Hon'ble NGT order in OA 1038/2018 dated 19-08-2019 by MoEF&CC, Govt. 01 India vide letter dated 31-10-2019 shall be followed in letter and spirit.	The company has developed the greenbelt area as per EIA report and as per the conditions mentioned in the Environment Compliance report. Green belt area is well maintained and approximate number of plants and species are as under: Ashok Plants – 50 Nos. Fruits Plants – 15 Nos. Fountain Plants – 6 Nos. Other Plants – 50 Nos. Plants/flowerpots – 500 Nos. Approx. Greenbelt photos of the Plant has been attached as EXHIBIT-III .
5	All the additional condition for grant of Consent to Establish (CTE)/Consent to Operate (CTO) related to Pollution mitigation measures as prescribed in the office memorandum of MoEF&CC, GoI dated 31.10.2019 and as deemed fit by UP Pollution Control Board in the consent orders shall be followed by Project Proponent.	Agreed to comply. Both CTE & CTO are enclosed in EXHIBIT- XII .
6	The project proponent shall submit within the next 3 months the details of solar power plant and solar electrification details within the project.	Not Applicable
7	The project proponent shall ensure to plant broad Leave trees and their maintenance. The CPCB guidelines in this regard shall be followed.	Being complied

8	The project proponent shall submit within the next 3 months the details on quantification of year wise CER activities along with cost and other details CER activities must not be less 2% of the project cost. The CER activities should be related to mitigation of Environmental Pollution and awareness for the same.	The PP has submitted year wise CER activities in Form-V and has been attached as EXHIBIT- IV . A facility for drinking water dispenser for public has been installed, photo enclosed in EXHIBIT- IV .														
9	The project proponent shall install micro solar power plants, toilets in nearby villages, public place or school from CER fund of the project for which EC is granted in addition to and water harvesting pits and carbon sequestration parks/designed ecosystems.	A facility for drinking water dispenser for public has been installed, photo enclosed in EXHIBIT- IV . Tree plantation has also been done at various places on regular intervals.														
10	The project proponent shall obtain the Forest clearance and permission of Central and State Government as per law under the provisions of Forest (conservation) Act, 1980 before the start of work.	Not Applicable.														
11	ZLD shall be ensured, in any circumstances effluent of any type shall not be discharged and find its way outside the factory premises. STP of adequate capacity shall be installed for the treatment of the domestic waste water.	<p>The unit is strictly maintaining Zero Liquid Discharge (ZLD) Policy.</p> <p>Process flow of treatment of Industrial Effluent in the ETP is attached as EXHIBIT-V.</p> <p>Water Test report after treatment by ETP dated 25.05.2023 is attached as EXHIBIT-VI.</p> <p>The treated water is sent to steam heated solar evaporator equipped with pump and sprayers for evaporation to achieve 100% ZLD.</p>														
12	SEIAA opined that the project proponent shall submit permission of CGWA or proposal for alternative source of fresh water.	<p>The project being a small one, in terms of investment, requirement and environmental requirements the water requirement will not exceed the stated quantity. However, the project site falls in Safe Block as per CGWA classification of zone regarding Groundwater availability, permission from CGWA has been already granted to us which is enclosed as EXHIBIT-VIII</p> <p>Total ground water requirements are below 15m³/day as per the details below :</p> <table border="1" data-bbox="873 1633 1523 1940"> <thead> <tr> <th>Activity</th> <th>Water requirement</th> </tr> </thead> <tbody> <tr> <td>Domestic water</td> <td>1 KLD</td> </tr> <tr> <td>Process Water</td> <td>0.92 KLD</td> </tr> <tr> <td>Wash Water</td> <td>0.7 KLD</td> </tr> <tr> <td>Cooling tower & Boiler</td> <td>2 KLD</td> </tr> <tr> <td>Gardening</td> <td>1 KLD</td> </tr> <tr> <td>Total</td> <td>5.62 KLD</td> </tr> </tbody> </table>	Activity	Water requirement	Domestic water	1 KLD	Process Water	0.92 KLD	Wash Water	0.7 KLD	Cooling tower & Boiler	2 KLD	Gardening	1 KLD	Total	5.62 KLD
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13	Certified compliance report for the earlier environmental clearance should be submitted within 03 months. In case of failure, the environmental clearance shall automatically deemed to be cancelled.	The Certified Compliance report is attached as EXHIBIT-I .
14	Zero liquid discharge should be practiced.	The unit is strictly maintaining Zero Liquid Discharge (ZLD). The treated water is then sent to steam heated solar evaporator equipped with pump and sprayers for evaporation to achieve 100% ZLD. Process flow of treatment of Industrial Effluent in the ETP is attached as EXHIBIT-V .
15	Statutory compliance:	
	i) The project proponent should obtain necessary permission from Drug Controller, Govt. of India, within time frame.	Permission from Drug Controller, GoI vide Certificate No. AGMU000913L valid from 14.01.2023 to 19.12.2027 has been attached as EXHIBIT-X
	ii) The project proponent shall obtain forest clearance under the provisions of Forest (Conservation) Act, 1986, in case of the diversion of forest land for non-forest purpose involved in the project.	Not Applicable
	iii) The project proponent shall obtain clearance from the National Board for Wildlife, if applicable	Not Applicable
	iv) 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 the six-monthly compliance report, (in case of the presence of schedule species in the study area).	Not Applicable as no Wildlife Sanctuary is present within 10 km of the project. Notification to MOEF&CC for this has been attached as EXHIBIT-XI
	v) The project proponent shall obtain Consent to Establish/Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State Pollution Control Board/ Committee.	CTE/CTO valid upto 31.12.2027 has been attached as EXHIBIT-XII
	vi) The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time	Authorization under the Hazardous and other Waste Management Rules, 2016 valid upto 05.02.2028, Copy of Hazardous waste Authorization Certificate and copy of contract with BHARAT OIL AND WASTE MANAGEMENT LTD. And latest copy of FORM – 6 & FORM-10 generated by BHARAT OIL AND WASTE MANAGEMENT LTD are also enclosed as EXHIBIT – XIII .

	<p>vii) The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules. 3989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.</p>	<p>Being Complied.</p> <p>NO Hazardous materials are manufactured.</p> <p>For Storage of Hazardous Raw Materials, separate area has been allotted which is locked under complete supervision where these chemicals are stored in sealed HDPE Drums/IBC Tanks and all the required precautions such as fire fighting equipments, emergency washing showers and other handling equipments like S.S. 316 Pumps and proper protective gear for the personnel are installed by the plant in that area.</p> <p>All the control measures for Hazardous chemicals as directed in Environmental Clearance are in its place as per the feasibility.</p> <p>Hazardous chemicals are stored in separate ventilated warehouses and are stored in HDPE drums or IBC tanks.</p> <p>Stainless steel pumps with closed handling systems are used for the handling and transferring/charging to the machines of all the Hazardous chemicals/solvents in the factory premises</p>
16	<p>Air quality monitoring and preservation:</p>	
	<p>i)The project proponent shall install 24X7 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 Environment (Protection) Act, 1986 or NABL accredited laboratories.</p>	<p>No provision as of now.</p> <p>However, Air monitoring has been done by third party lab.</p> <p>Air emission monitoring report dated 23.05.2023 has been attached as EXHIBIT-XIV</p>
	<p>ii) The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through tabs recognized under Environment (Protection). Act, 1986</p>	<p>Not Applicable.</p> <p>No fugitive emission occurs from the plant process.</p>

	<p>iii) 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 PM_{2.5} in reference to PM emission, and SO₂ and NO_x in reference to SO₂ and NO_x emissions) within and outside the plant area at least at our locations (one within and three outside the plant area at an angle of 120⁰ each), covering upwind and downwind directions.</p>	<p>Ambient Air Quality Data is collected within project premises on a regular basis.</p> <p>The result of the Ambient Air Quality monitoring on the environmental data Display Board dated 20.04.2023 has been attached as EXHIBIT-XV</p>
	<p>iv)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 emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.</p>	<p>Air monitoring report by third party lab has been attached as EXHIBIT-XIV</p>
	<p>v)Storage of raw materials, coat etc., shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.</p>	<p>Being complied.</p> <p>For Storage of Hazardous Raw Materials, separate area has been allotted which is locked under complete supervision where these chemicals are stored in sealed HDPE Drums/IBC Tanks and all the required precautions such as fire fighting equipments, emergency washing showers and other handling equipments like S.S. 316 Pumps and proper protective gear for the personnel are installed by the plant in that area.</p> <p>All the control measures for Hazardous chemicals as directed in Environmental Clearance are in its place as per the feasibility.</p> <p>Hazardous chemicals are stored in separate ventilated warehouses and are stored in HDPE drums or IBC tanks.</p> <p>Stainless steel pumps with closed handling systems are used for the handling and transferring/charging to the machines of all the Hazardous chemicals/solvents in the factory premises.</p>
	<p>vi) 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.</p>	<p>Being complied</p>
	<p>vii)The National Ambient Air Quality Emission Standards issued by the 'Ministry vide G.S.R. No.826(E) dated 16th November, 2009 shall be complied.</p>	<p>Being Complied</p>
17	<p>Water quality monitoring and preservation:</p>	

	i)The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises (applicable in case of the projects achieving ZLD)	The PP is carrying out water monitoring on a regular basis. The result of the Water Quality monitoring on the environmental data Display Board dated 20.04.2023 has been attached as EXHIBIT-XV
	ii) 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 projects achieving the ZLD).	The unit is strictly maintaining Zero Liquid Discharge (ZLD). Process flow of treatment of Industrial Effluent in the ETP is attached as EXHIBIT-V . Water Test report after treatment by ETP dated 25.05.2023 is attached as EXHIBIT-XVI . The treated water is sent to steam heated solar evaporator equipped with pump and sprayers for evaporation to achieve 100% ZLD.
	iii)The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the State Pollution Control Board while granting Consent under the Air/Water Act, whichever, is more stringent.	Water monitoring report by third party lab dated 23.05.2023 has been attached as EXHIBIT-XVII
	iv) 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.	The PP has obtained permission from the competent authority, Ground Water Department, Namami Gange & Rural Water Supply Department vide Registration No. 202108000779 valid from 15.09.2021 to 14.09.2026 for abstraction of 15 m ³ . Being Complied.
	v) Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.	Agreed to comply.
	vi) The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.	The rainwater in the factory premises is collected in a cistern and stored water is slowly discharged into the ground. Being complied. The rainwater harvesting plan has been attached as EXHIBIT-XVII
	vii) 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 this regard.	Being complied. Plant has installed a 63KVA silent generator with acoustic enclosure which is a JAKSON make and which is also approved by CPCB and follows all CPCB standards. A stack of adequate height has also been installed to the DG set.
18	Noise monitoring and prevention:	

	i) Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Being complied.
	ii) 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.	Being complied.
	iii) The ambient noise levels should conform to the standards prescribed under E(P)A 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.	The operation of the project is conforming to the prescribed standards. Noise monitoring report dated 23.05.2023 has been attached as EXHIBIT-XIX .
19	Energy Conservation measures:	
	i) The energy sources for lighting purposes shall preferably be LED based	Being complied.
20	Waste management:	
	i) Hazardous chemicals shall be stored in tanks, Tank farms, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.	Being complied. Hazardous chemicals are stored in separate ventilated warehouses and are stored in HDPE drums or IBC tanks. Entire plant is flameproof and various fire fighting equipments are well placed throughout the plant. Stainless steel pumps with closed handling systems are used for the handling and transferring/charging to the machines of all the hazardous chemicals/ solvents in the factory premises. Proper fire fighting equipments are provided in the hazardous chemicals warehousing facilities. Proper earthing has been provided to all the electrical equipments, all machines, ETP throughout the plant. The stocks of solvents/chemicals are maintained and used very carefully without spillage and proper measures are taken for the use of the solvents as per the guidelines. Proper fire-fighting equipments such as Automatic Fire Hydrant System with 30 HP primary and 7.5 HP secondary water pump with automatic operating electrical panel, various ABC powder fire extinguishers, CO ₂ fire extinguishers, Drum fire Trolleys, Automatic fire alarm system with smoke detectors and proper 4" water pipelines with pipes and sprayer system are provided in the plant.
	ii) 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	Authorization under the Hazardous and other Waste Management Rules, 2016 valid upto 05.02.2028, Copy of Hazardous waste Authorization Certificate and copy of contract with BHARAT OIL AND WASTE MANAGEMENT LTD. And latest copy of FORM – 6 & FORM-10 generated by BHARAT OIL AND

		WASTE MANAGEMENT LTD are also enclosed as EXHIBIT – XIII.
	<p>iii)The company shall undertake waste minimization measures as below:</p> <p>a) Metering and control of quantities of active ingredients to minimize waste.</p> <p>b) Reuse of byproducts from the process as raw materials or as raw material substitutes in other processes.</p> <p>c) Use of automated filling to minimize spillage.</p> <p>d) Use of Close Feed system into batch reactors.</p> <p>e) Venting equipment through vapour recovery system</p> <p>f) Use of highpressure hoses for equipment clearing to reduce wastewater generation.</p>	<p>Waste minimization is a priority during operation of the project and all conditions stated in the environmental clearance are being complied strictly. For minimization of waste, the project proponent has adopted following practices:</p> <ul style="list-style-type: none"> • Prevention or avoiding the waste • Minimization of waste as much as possible • Reuse, if possible • Recycling • Disposal, if any <p>Stainless steel pumps with closed handling systems are used for the handling and feeding, transferring and charging to the batch reactors of all the chemicals/solvents in the factory premises.</p> <p>Stainless steel reflux condensers provided over the reactor and condensers are operated by running chilled water to achieve complete condensation.</p> <p>Maintenance and Repair of pumps, pipelines, machines, leaks when occurs are done immediately in the factory premises.</p> <p>The acids/chemicals shall be taken to the reactors through closed pipelines which are transferred by the stainless steel/Teflon pumps.</p>
21	Green Belt:	
	<p>i) 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 in direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department-</p>	<p>The company has developed the greenbelt area as per EIA report and as per the conditions mentioned in the Environment Compliance report.</p> <p>Green belt area is well maintained and approximate number of plants and species are as under: Ashok Plants – 50 Nos. Fruits Plants – 15 Nos. Fountain Plants – 6 Nos. Other Plants – 50 Nos. Plants/flowerpots – 500 Nos. Approx.</p> <p>Greenbelt area in the plant and along the periphery has been attached as EXHIBIT- III.</p>
22	Safety, Public hearing and Human health issues:	
	<p>i) Emergency preparedness plan based on the Hazard identification and Risk Assessment Oil (HIRA) and Disaster Management Plan shall be implemented.</p>	<p>Being complied. Disaster Management Plan and Risk Mitigation Measures have been attached as EXHIBIT- XXI respectively.</p>

	ii) 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.	Being complied. Proper fire-fighting equipments such as Automatic Fire Hydrant System with 30 HP primary and 7.5 HP secondary water pump with automatic operating electrical panel, various ABC powder fire extinguishers, CO ₂ fire extinguishers, Drum fire Trolleys, Automatic fire alarm system with smoke detectors and proper 4" water pipelines with pipes and sprayer system are provided in the plant.
	iii)The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.	All norms of occupational health and safety are being strictly complied by the company. Usage of PPE's containing aprons, gowns, masks, gloves, head caps, chemical resistant shoes are being strictly followed by the plant.
	iv)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.	Training on safety and health aspects of chemical handling is provided to all employees and Record for Environmental Training Program of Employee has been attached as EXHIBIT- VII Dr. Tara Mohan for the periodic medical examination for all employees and proper surveillance record of Medical Fitness is being maintained by the company and has been attached as EXHIBIT- IX.
	v) 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.	Not Applicable. The project is in operational phase.
	vi) Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the factories Act.	Dr. Tara Mohan for the periodic medical examination for all employees and proper surveillance record of Medical Fitness is being maintained by the company and has been attached as EXHIBIT- IX.
	vii)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.	Being complied
23	Corporate Environment Responsibility:	
	i)The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No.22-65/2017-1A.III dated 1st May 2018, as applicable, regarding Corporate Environment Responsibility.	Being complied

	ii) The company shall have a well laid down environmental policy duly approved 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.	Being complied The company shall have a well laid down environmental policy duly approved by the Board of Directors enclosed in EXHIBIT- XVIII . Copy of board resolution in this regard is enclosed in EXHIBIT- XX .
	iii) 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 report to the head of the organization.	The structure of the company being very small, the scope of formulation of a separate Environmental cell is not feasible. But, the management will monitor the environmental performance of Operation.
	iv) 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 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	Being complied. Year wise progress of Implementation of Action Plan for the year 2022-2023 submitted in Form-V has been attached as EXHIBIT- IV Total Funds allocated for Management, Pollution control measures, Greenbelt, CSR etc. for the last two years is as below: FY 2021-2022 – 4,19,567/- FY 2022-2023 – 5,50,714/-
	v) Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out	Being complied.
24	Miscellaneous:	
	i) Environment Clearance subjected to condition of necessary permission from Drug Controller and Department of Industry.	Permission from Drug Controller, Food Safety & Drug Administration, U.P. vide Certificate No. AGMU000913L valid from 14.01.2023 to 19.12.2027 has been attached as EXHIBIT- X
	ii) Monitoring of dioxin and furon from biomass fueled boiler should be done.	Will be complied.
	iii) Agreement with TSDF vendors shall be submitted	TSDF membership agreement of M/s Rati Pushp Intermediates Pvt. Ltd. with Bharat Oil & Waste Management Ltd. has been attached as EXHIBIT- XIII .
	iv) 100% waste water is to be treated in ETP conforming to prescribed standards of receiving body for designated use.	The unit is strictly maintaining Zero Liquid Discharge (ZLD). The treated water is sent to steam heated solar evaporator equipped with pump and sprayers for evaporation to achieve 100% ZLD. Process flow of treatment of Industrial Effluent in the ETP is attached as EXHIBIT-III .

	v)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.	Advertisement has been already published in two local newspapersnamely Muzaffarnagar Bulletin and Shah Times on 24.02.2012. Copy of the advertisements were already attached previously.
	vi)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 display the same for 30 days from the date of receipt,	Already circulated as per notification.
	vii) 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.	Six Months Compliance status reportof all the stipulated environmentalclearance conditions has also beenuploaded on the company's websiteand it can be checked on thefollowing website: www.ratipushp.in
	viii) 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,	Being complied.
	ix) 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.	The PP is submitting every Six Months Compliance status report ofall the stipulated environmentalclearance conditions to the respective regional office of MOEF and UPPollution control board.
	x)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.	Rs. 4,19,567/- (FY 2021-2022) Rs. 5,50,714/- (FY 2022-2023) is the total Expenditure incurred oncompliance of environmentalconditions / pollution control,Greenbelt, CSR etc. In this regard Form–V for AnnualEnvironment statement for FY2022-2023 is enclosed as EXHIBIT-IV
	xi)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.	Being complied, accordingly.
	xii)The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.	The project authorities isstrictly adhering to the stipulations made by the State Pollution Control Board and the State Government.

	xiii) 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.	Being complied
	xiv) No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MOEF &CC).	Agreed to comply
	xv) 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.	Agreed to comply
	xvi)The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory	Agreed to comply
	xvii) The Ministry reserves the right to stipulate additional conditions if found necessary, The Company in a time bound manner shall implement these conditions.	Agreed to comply
	xviii) The Regional Office of this Ministry 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.	Agreed to comply
	xix)The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble supreme Court of India / High Courts and any other Court or Law relating to the subject matter.	Agreed to comply
	xx)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.	Agreed to comply
	Concealing factual data and information or submission of false/fabricated data and failure to comply with any of the conditions stipulated in the Prior Environmental Clearance attract action under the provision of Environmental (Protection) Act, 1986.	

EXHIBIT-I



भारत सरकार
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
एकीकृत क्षेत्रीय कार्यालय, लखनऊ
Ministry of Environment, Forest & Climate Change
Integrated Regional Office, Lucknow



राष्ट्रीय भवन, पंचस्य भवन, अंतरा-भाग, अलीगंज, वाराणसी-226024
Kendriya Bhawan, 5th Floor, Sector-II, Aliganj, Lucknow-226024, Telefax-2326696
Email: mcz.lko-mefc@gov.in, goimozlko@gmail.com

File No.- IV/ENV/UP/Ind-130/328/2011 / 15/15

Speed Post/Email
Date: 12.04.2021

सेवा,
निदेशक (निर्माण), आईए डिवाजन
पर्यावरण वन और जलवायु परिवर्तन मंत्रालय
इंदिरा पर्यावरण भवन, जोर बाग रोड,
अलीगंज, नई दिल्ली -110 003

विषय: "डूंग इंटरमीडिएट्स मैनुफैक्चरिंग यूनिट, एल बेस (4.32 टीपीए), डी बेस (12.48 टीपीए), क्लोरमैकेनिकल पाउडर (7.20 टीपीए) और क्लोरिमैकेनिकल पामिटेड (4.687 टीपीए) 8 किमी, जानसठ रोड, राणा येपर्स, 1088/2 शेरनगर, मुजफ्फरनगर के पास। मैसर्स आरपी इंटरमीडिएट" की प्रमाणित अनुपालन रिपोर्ट के संबंध में-

संदर्भ: पर्यावरण स्वीकृति सं.: J-11011/204/2010-1A-II(I), DL-25.08.2011

महोदय,

मुझे 'मैसर्स आरपी इंटरमीडिएट' की उपरोक्त परियोजना के लिए प्रमाणित अनुपालन रिपोर्ट की प्रति के साथ संलग्न करने का निर्देश दिया गया है। यह सक्षम प्राधिकारी की मंजूरी के साथ जारी किया गया है।

भवदीया
श्रीती त्रिपाठी
(2.04.21)
(डॉ प्रीति त्रिपाठी)
उपनिदेशक 'वे0'

जानकारी के लिए कॉपी और आगे की आवश्यक कार्यवाही के लिये अप्रेषित :-

1. डॉ श्रुति भारद्वाज, अतिरिक्त निदेशक (निगरानी प्रकोष्ठ), पर्यावरण और जलवायु परिवर्तन मंत्रालय, इंदिरा पर्यावरण भवन, जोर बाग रोड, अलीगंज, नई दिल्ली -110 003। ईमेल: shruti.raj@nic.in
2. मैसर्स रति पुष्प इंटरमीडिएट प्रा0 लिमिटेड रामजी सदन, 494-95, कंबलवाला बाग, नई मंडी, मुजफ्फरनगर -251001, उत्तर प्रदेश, ईमेल: ratipushp@yahoo.com

श्रीती त्रिपाठी
(2.04.21)
(डॉ प्रीति त्रिपाठी)
उपनिदेशक 'वे0'



भारत सरकार

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
एकीकृत क्षेत्रीय कार्यालय, लखनऊ



Ministry of Environment, Forest & Climate Change
Integrated Regional Office, Lucknow

केन्द्रीय भवन, पंचम तम, सेक्टर-एच, अलिगंज, लखनऊ-226024

Kendriya Bhawan, 5th Floor, Sector-H, Aliganj, Lucknow-226024, Telefax-2326696

Email: roc.lko-mefc@gov.in, golinco@rolko@gmail.com

Monitoring Report

S.No.	Items	Details
1.	परियोजना का नाम Name of Project	Drug Intermediates Manufacturing Unit, L Base (4.32 TPA), D Base (12.48 TPA), Chloramphenicol Powder (7.20 TPA) and Chloramphenicol Palmitate (4.687 TPA) at 8 th E, Kri, Jansath Road, near Rana Papers, 1088/2 Shernagar, Muzaffarnagar, M/s R.P. Intermediates)
2.	परियोजना प्राधिकारण का पता Address of project authorities	M/s Rati Pusp Intermediates Pvt Ltd. Ramji Sadan, 494-95, Kambalwala Bagh, New Mandi, Muzaffarnagar, UP-251 001 Phone: 0131-2606573, 2660034 (work), Fax:2602764
3.	पर्यावरणीय स्वीकृति सं० एवं तिथि Env. Clearance letter no. & Date	J-11011/204/2010-IA-II(I), Dt.-25.08.2011
4.	क्षेत्रीय कार्यालय पत्र सं० Regional Office File no.	IV/ENV/UP/Ind-130/328/2011
5.	स्थल दौरा तिथि Date of site visit	25.01.2021
6.	परियोजना की स्थिति Status of Project	Not in operation

7. स्थल दौरा के दौरान अवलोकन/Observations made during the site visit:

During the day of site visit, Mr. Abhishek Gupta, Managing Director (M/s Rati Pusp Intermediates Pvt Ltd.) was present at site for discussion. PAs informed that project was not operational since 20th December, 2020 due to some maintenance work. However, the specific and general EC conditions were monitored by the undersigned on the basis of the physical inspection and the documents submitted to this office. During physical site inspection and discussion with PAs, it has been noticed that PAs have complied or are in the process of complying the environmental conditions stipulated for this project, however some non-compliance were also observed and are as following:

J-11011/204/2010-IA-II(I), Dt.-25.08.2011

1. The latest six-monthly third party analysis report (NABL/MoEF&CC accredited lab) for the ambient air quality parameters should be submitted to this office.
2. The green belt should be develop upto 33% of land area as per the accorded EC by planting more no. of indigenous plants with thick canopy every year and the details should be submitted to this office.
3. PAs are requested to submit the latest ambient and DG set noise monitoring report (NABL/MoEF&CC accredited lab) to this office.
4. The details regarding the compliance of environmental protection measures and safeguards, risk mitigation measures and public hearing should be submitted to this office.
5. The details of the expenditure done so far regarding the CSR activities for this FY should be submitted to this office.
6. The details regarding the fund allocated for management/pollution control measures towards the capital cost and recurring cost for the last two year should be submitted to this office.

The detailed condition wise compliance report is as following:

S.No.	Specific Conditions	Compliance status
(i)	National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S. R.608 (E) dated 21.07.2010 and amended time to time shall be followed by the unit.	The company is adhering to all the environmental standards applicable to the Industries of the same as directed in Environmental Clearance. No Emissions/Gases are emitted during the manufacturing process in the factory premises as all processes are in closed systems except the boiler and generator. Being complied.
(ii)	Ambient air quality data shall be collected as per NAAQES standards notified by the Ministry vide CSR No. 826 (E) dated 16.09.2009. The levels of PM ₁₀ , SO ₂ , NO _x , and VOC shall be monitored in the ambient air and displayed at a convenient location near the main gate of the company and at important public places. The company shall upload the results the monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the RO of MoEF, the respective zonal office of CPCB and UPPCB.	During the site visit, the ambient air quality parameters found displayed on the main gate of the company, which was updated on 06.07.2020. The latest six-monthly third party analysis report (NABL/MoEF&CC accredited lab) for the ambient air quality parameters should be submitted to this office. Partly complied.

(iii)	<p>In plant control measures for checking fugitive emission from all the vulnerable sources shall be provided. Adequate dust suppression systems with water spray shall be provided for storage yard, junction houses. Raw material loading and unloading area shall be covered and also provided with water spraying system. Fugitive emissions in the work zone environment, product, raw material storage area etc. shall be regularly monitored and records maintained. The emissions shall conform to the limits stipulated by the U.P. Pollution Control Board (UPPCB).</p>	<p>The production process being a wet one, the only source of fugitive emission is transportation of materials. All the chemicals are stored in closed storage conditions and warehouses. Stainless steel pumps with closed handling systems are used for the handling and transferring/charging to the machines of all the chemicals in the factory premises. Water is being sprinkled daily on the internal roads. Being complied.</p>
(iv)	<p>For further control of fugitive emission following steps shall be followed :</p> <ol style="list-style-type: none"> Closed handling system shall be provided for chemicals. Reflux condenser shall provided over reducer. System of leak detection and repair of pump/pipeline based on preventive maintenance. The acids shall be taken from storage tanks to reactors through closed pipeline storage tanks shall be vented through trap receiver and condenser operated on chilled water. Cathodic protection shall be provided to the underground solvent storage tanks. 	<p>PAs submitted that all the control measures for fugitive emissions as directed in environmental clearance are in its place as per the feasibility.</p> <ul style="list-style-type: none"> Stainless steel pumps with closed handling systems are used for the handling and transferring/charging to the machines of all the chemicals in the factory premises. Stainless steel reflux condensers are provided over the reactor and condensers are operated by running chilled water to achieve complete condensation. Maintenance and repair of pumps, pipelines, machines, leaks when occurs are done immediately in the factory premises. The acids/chemicals shall be taken to the reactors through closed pipelines which are transferred by the stainless steel/teflon pumps. No underground solvent storage tanks are provided in the plant premises as solvents and chemicals are used in small quantities which are stored in HDPE drums in closed warehouse systems so, cathodic protection is not required in the

Signature

		factory premises. Being complied.
(v)	As proposed catalytic converter shall be provided to DG set to control gaseous emissions within permissible limit. The gaseous emissions from DG set shall be dispersed through adequate stack height as per CPCB standards. Acoustic enclosure shall be provided to the DG sets to mitigate the noise pollution.	During site visit, enclosed type of DG set of 63KVA (JAKSON make) found installed with adequate stack height (10 m) as per the CPCB standards, which is also approved by CPCB and follows all CPCB standards. Being complied.
(vi)	Solvent management shall be carried out as follows: i. Reactor shall be connected to chilled brine condenser system. ii. Reactor and solvent handling pump shall have mechanical seals to prevent leakages. iii. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery. iv. Solvents shall be stored in a separate space specified with all safety measures. v. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. vi. Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	PAs submitted that all the control measures for solvent management have been taken as per feasibility as below: <ul style="list-style-type: none"> • Chilled brine solution is circulated in the condenser system and in the jackets of reactors to achieve maximum recovery. • The stocks of solvents/chemicals are maintained and used very carefully without spillage and proper measures are taken for the use of the solvents as per the guidelines. • Material safety data sheet (MSDS) of all the solvents and other chemicals are maintained as records and followed by plant. • All the chemicals which are required are purchased in proper HDPE drums so that proper collection and handling can be done. Also, during handling of chemicals proper drum lifter, gloves, masks, solid high length chemical shoes are used. Closed and ventilated warehouses are provided for proper storage of chemicals. • Proper earthing has been provided to all the electrical equipments, all machines, ETP throughout the plant. • Entire plant is flameproof and various fire fighting equipments are well placed throughout the plant. Proper fire fighting equipments are provided like Automatic Fire Hydrant System,

		<p>Automatic water Sprinklers system, various ABC powder fire extinguishers, CO₂ fire extinguishers, Drum Fire trolleys, and proper water pipelines with pipes and sprayer systems are provided in the plant premises.</p> <p>Being complied.</p>																														
(vii)	Total ground water requirement shall not exceed 251 m ³ /day and prior permission for the drawl of ground water shall be obtained from the State Ground Water Board / Central Ground Water Authority (SGWB/CGWA).	<p>PAs have obtained the CGWA permission vide letter no. CGWA/NOC/IND/ORIG/2019/6341 valid from 17.10.2019 to 16.10.2021 for abstraction of 2.5m³/day.</p> <p>Being complied.</p>																														
(viii)	Total industrial effluent generation shall not exceed 0.2 m ³ /day. Industrial effluent shall be treated in ETP. Treated effluent shall be reused/recycled within the factory premises. Water quality of treated effluent shall meet the norms prescribed by CPCB/SPCB.	<p>PAs submitted that total industrial effluent generated is below 0.2m³/day which is also solar evaporated after treatment from the effluent treatment plant.</p> <p>The quantity of Industrial effluent is restrained to the stated quantity. The ETP treated effluent was analysed by Shree Krishna Analytical Services (NABL accredited lab) dt. 09.01.2020 and the parameters were found within the permissible limit.</p> <table border="1"> <thead> <tr> <th>S. N.</th> <th>Parameters</th> <th>Units</th> <th>Limits</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>pH</td> <td>—</td> <td>5.5-9.0</td> <td>7.59</td> </tr> <tr> <td>2.</td> <td>TSS</td> <td>mg/l</td> <td>100</td> <td>32.5</td> </tr> <tr> <td>3.</td> <td>Oil and Grease</td> <td>mg/l</td> <td>10</td> <td>3.9</td> </tr> <tr> <td>4.</td> <td>BOD (30 days at 27°C)</td> <td>mg/l</td> <td>30</td> <td>21.5</td> </tr> <tr> <td>5.</td> <td>COD</td> <td>mg/l</td> <td>250</td> <td>96.0</td> </tr> </tbody> </table> <p>Being complied.</p>	S. N.	Parameters	Units	Limits	Result	1.	pH	—	5.5-9.0	7.59	2.	TSS	mg/l	100	32.5	3.	Oil and Grease	mg/l	10	3.9	4.	BOD (30 days at 27°C)	mg/l	30	21.5	5.	COD	mg/l	250	96.0
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5.	COD	mg/l	250	96.0																												
(ix)	NO effluent shall be discharged outside the factory premises and zero discharge concept shall be adopted	<p>PAs submitted that zero discharge concept is being adopted in the premises. The treated water from ETP is transferred for solar evaporation to the drying beds which are equipped with Pump and Sprayers to achieve the 100% Zero discharge policy.</p> <p>Being complied.</p>																														
(x)	Hazardous chemical shall be stored in	<p>PAs submitted that all the control measures</p>																														

	tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be pumps.	for hazardous chemicals are in its place as per the feasibility. Hazardous chemicals are stored in separate ventilated warehouses and are stored in HDPE drums or IBC tanks. Stainless steel pumps with closed
		handling systems are used for the handling and transferring/charging to the machines of all the hazardous chemicals/solvents in the factory premises. Proper firefighting equipments are provided in the hazardous chemicals warehousing facilities. Being complied.
(xi)	The company shall obtain authorization for collection, storage and disposal of Hazardous waste under the Hazardous Waste (Management, Handling and Transfer Boundary Movement) Rules, 2008 and as amended as on date for management of Hazardous wastes and prior permission from UPPCB shall be obtained for disposal of solid/hazardous waste in the TSDF. Measures shall be taken for firefighting facilities in case of emergency.	The company is adhering to all the relevant legislations and guideline of USPCB in case of hazardous waste collection, handling, storage and disposal. PAs have submitted the copy of agreement with Bharat Oil and Waste Management Ltd. dated 20.08.2020 for collection, storage and disposal of Hazardous waste under the Hazardous Waste (Management, Handling and Transfer Boundary Movement) Rules, 2008. In case of Emergency, proper fire-fighting equipments are provided like Automatic Fire Hydrant System, ABC powder fire extinguishers, CO ₂ fire extinguishers and proper water pipelines with pipes and sprayer systems are provided in the entire plant premises. Being complied.
(xii)	The company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	As informed by PAs, no hazardous products are being manufactured in the plant. For storage of hazardous raw materials, separate area has been allocated which is locked under complete supervision where these chemicals are stored in sealed HDPE Drums/IBC tanks and all the required precautions such as fire fighting equipments, emergency washing showers and other handling equipments like S.S

		316 Pumps and proper protective gear for the personnel are installed by the plant in that area. Being complied.
(xiii)	Entire plant where solvents are used be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	Proper flameproof arrangements are provided where solvents are used like flame proof motors, firefighting equipments and water arrangements are also provided nearby. PAs informed that very small quantities of solvents are required; thus stored in HDPE drums. Being complied.
(xiv)	The company shall undertake following waste minimization measures. <ul style="list-style-type: none"> • Metering and control of quantities of active ingredients to minimize waste. • Reuse of by-products from the process as raw materials or as raw substitutes in other processes. • Maximizing recoveries. • Use of automated material transfer system to minimize spillage. • Use of "close feed" into batch reactors. 	<ul style="list-style-type: none"> • Prevention or avoiding the waste • Reuse if possible. • Recycling • Disposal, if any. Stainless steel pumps with closed handling systems are used for the handling and feeding, transferring, charging to the batch reactors of all the chemicals/solvents in the factory premises. • Stainless steel reflux condensers are provided over the reactor and condensers are operated by running chilled water to achieve complete condensation. Being complied.
(xv)	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.	Proper firefighting equipments are provided like Automatic Fire Hydrant System, Automatic water Sprinklers system, various ABC powder fire extinguishers, CO ₂ fire extinguishers, Drum Fire trolleys, and proper water pipelines with pipes and sprayer systems are provided in the plant. Being complied.
(xvi)	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	PAs submitted that Dr. Tara Mohan (M.B.B.S. , M.D.) has been appointed by the firm for the regular health checkups of employees and proper surveillance records are maintained by the firm in this regard. Being complied.

(xvii)	Green belt shall be developed in 33 % area with suitable species of the plants as per the CPCB guidelines to mitigate the effects of fugitive emissions.	PAs submitted the detail of green belt area by indicating the number of plants and species are as under : Ashok Plants – 50 Nos. Fruits Plants – 15 Nos. Fountain Plants – 6 Nos.
		Other Plants – 50 Nos. Plants/flowerpots – 500 Nos. approx The green belt should be developed upto 33% of land area as per the accorded EC by planting more no. of indigenous plants with thick canopy every year and the details should be submitted to this office. Partly complied.
(xviii)	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, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the project. All the construction wastes shall be managed so that there is no impact on the surrounding environment.	The project is in operational phase. Not applicable at present.
General Conditions:		
(i)	The project authorities shall strictly adhere to the stipulations of the SPCB/state government or any statutory body.	PAs have obtained the Consent for Air and Water from UPPCB valid from 01.01.2019 to 31.12.2023. Being complied.
(ii)	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	PAs have obtained the EC from SEIAA vide letter no. 191/Patya/SEIAA/S667/2019 dated 07/07/2020 for the expansion of the APIS and Bulk Drugs Manufacturing Unit from 28.70 TPA to 324 TPA. However, till the date of site visit, the production was as per the existing CTO. Being complied.

(iii)	The location of Ambient air quality monitoring station shall be decided in consultation with the SPCB and it shall be ensured that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentration are anticipated in consultation with the SPCB.	The third party analysis report (NABL/MoEF&CC accredited lab) for the ambient air quality parameters should be submitted to this office. Not complied.
(iv)	The overall noise levels in and around the plant areas shall be kept well within the standards (85 d.b.a) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standard prescribed under EPA Rules, 1989 viz. 75 d.b.a. (daytime) and 70 d.b.a. (night time).	PAs are requested to submit the latest ambient and DG set noise monitoring report (NABL/MoEF&CC accredited lab) to this office. Not complied.
(v)	The company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	The rain water available in the factory premises is collected in a cistern and stored water is slowly charged into the ground. Being complied.
(vi)	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	PAs submitted that Dr. Tara Mohan (M.B.B.S., M.D.) has been appointed by the firm for the regular health checkups of employees and proper surveillance records are maintained by the firm in this regard. A regular training program regarding environment protection has been done by the plant and record for the same has been submitted by the PAs to this office. Being complied.
(vii)	Usage of Personnel Protection Equipments (PPEs) by all employees/workers shall be ensured.	Agreed to comply with.
(viii)	The company shall also comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental	The details regarding the compliance of environmental management and safeguards, risk mitigation measures and public hearing should be submitted to this office. Not complied.

	management, risk mitigation measures and public hearing relating to the project shall be implemented.	
(ix)	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CSR activities shall be undertaken by involving local villages and administration.	The details of the expenditure done so far regarding the CSR activities for this FY should be submitted to this office. Not complied.
(x)	The company shall undertake eco-developmental measures including for community welfare measures in the project area for the overall improvement of the environment.	Eco-development activities as per the relevance and as recorded in EIA/EMP report is been done on regular basis. Proper cleaning, sanitization, Tree plantation and other measures are taken for improving socio-economic conditions of the surrounding are done by the plant. Being complied.
(xi)	A separates environmental management cell equipped with the full fledged laboratory facilities shall be set up to carry out the environmental management and monitoring function.	During the site visit, full-fledged laboratory facilities was found for environmental management and monitoring function. PAs submitted that due to involvement of very small number of staff, the scope of formulation of a separate environmental management cell is not feasible. Hence, the management monitor the environmental performance of operation. Being complied
(xii)	As proposed, the company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/pollution control measures shall not be diverted for any other purpose.	The details regarding the fund allocated for management/pollution control measures towards the capital cost and recurring cost for the last two year should be submitted to this office. Not complied.
(xiii)	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad/Municipal Corporation, Urban Local	Agreed to comply with.

	Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.	
(xiv)	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well as by e-mail) to the Regional Office of MOEF, the respective Zonal Office of CPCB and the SPCB. The Regional Office of this Ministry at Lucknow/ CPCB /SPCB shall monitor the stipulated conditions.	PAs have submitted the recent six-monthly compliance report for the period of Apr-Sep, 2020. Being complied.
(xv)	The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental conditions and shall also be sent to the respective Regional Office of the MOEF by e-mail.	Rs. 1,53,490/- is the total Expenditure incurred on compliance of environmental conditions/pollution control. In this regard Form - V for Annual Environment statement for FY 2019-2020 has been submitted by PAs. Being complied.
(xvi)	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at Website of the Ministry at http://envfor.nic.in . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a	Advertisement has been already published in two local newspapers namely Muzaffargarh Bulletin and Shah Times on 24.02.2012. Complied.

Proposed

	copy of the same shall be forwarded to the Ministry's Regional Office.	
(xvii)	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Complied.
8.	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory	Agreed to comply with.
9.	The Ministry reserves the right to stipulate additional conditions, if found necessary. The company in a time bound manner will implement these conditions.	Agreed to comply with.
10.	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Waste (Management, Handling and Trans-boundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Assured to comply with.

8. निर्णय लिया (यदि कोई) / Action taken (if any): Letter has been issued to PAs to submit detail/take corrective measures on the above non-compliance issues.

भवदीया
 प्रीति त्रिपाठी
 28-03-21
 (डा० प्रीति त्रिपाठी)
 उपनिदेशक 'ब'०'



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF: ACTIVE PHARMACEUTICAL INGREDIENTS (API'S) & INTERMEDIATES

Works : 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P) India + Mobile : 9837473348

Postal Add. : Ramji Sadan, 494-95, Kambalwala Bagh, New Mandi,
Muzaffarnagar-251001 (U.P) India

e-mail : ratipushp@yahoo.com + website : www.ratipushp.com

1st May, 2021

To,
Dr. Preeti Tripathi,
Scientist "C",
Ministry of Environment, Forest & Climate Change
Regional Office (Central Region)
Kendriya Bhawan (5th Floor), Sec-II,
Aliganj, Lucknow, U.P. - 226024

Sub : Regarding Reply of Letter No. IV/ENV/UP/Ind-130/328/2011/15 dated 12.04.2021

Respected Ma'am,

We have received your **Letter No. IV/ENV/UP/Ind-130/328/2011/15 dated 12.04.2021** by E-Mail on 22.04.2021 for Certified Compliance report.

In this regard, Details of some Non-Compliance conditions are stated as below :

S.NO.	SPECIFIC CONDITIONS	COMPLIANCE STATUS
1.	The Latest six-monthly third party analysis report (NABL/MoEF&CC accredited lab) for the ambient air quality parameters should be submitted to this office.	The Latest six-monthly third party analysis report (NABL/MoEF&CC accredited lab) for the ambient air quality parameters is enclosed as EXHIBIT - I .
2.	The green belt should be develop upto 33% of land area as per the accorded EC by planting more no. of indigenous plant with thick canopy every year and the details should be submitted to this office.	The Company has already developed The Greenbelt area as declared in EIA report and as per the conditions mentioned in Environmental Clearance. Green belt area is well maintained by the firm and approximate number of plants and species are as under ; Ashok Plants (Existing) - 50 Nos. Ashok Plants (New) - 25 Nos. Fruit Plants - 15 Nos. Fountain Plants - 6 Nos. Other Plants - 50 Nos. Plants/Flower Pots - 500 Nos. (Approx.) The Company is expanding the green belt and planting new trees on regular basis and recently we have planted 25 Nos. of New Ashok Plants.
3.	PAs are requested to submit the latest ambient and DG set noise monitoring report (NABL/MoEF&CC accredited lab)	The latest ambient and DG set noise monitoring report (NABL/MoEF&CC accredited lab) is enclosed as EXHIBIT -



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF : ACTIVE PHARMACEUTICAL INGREDIENTS (API'S) & INTERMEDIATES

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Muzaffarnagar-251001 (U.P.) India + Mobile : 9837473348

Postal Add. : Ramji Sadan, 494-95, Kambalwala Bagh, New Mandi,
Muzaffarnagar-251001 (U.P.) India

e-mail : ratipushp@yahoo.com + website : www.ratipushp.com

4.	The details regarding the compliance of environmental protection measures and safeguards, risk mitigation measures and public hearing should be submitted to this office.	Details of Enviromental protection and risk mitigation measures are enclosed with EXHIBIT - III Detailed Disaster Management Plan is also enclosed as EXHIBIT - IV
5.	The details of the expenditure done so far regarding the CSR activities for this FY should be submitted to this office.	The expenditure done so far regarding the CSR activities for this FY 2020-2021 was Rs. 1,09,140/-
6.	The details regarding the fund allocated for management/pollution control measures towards the capital cost and recurring cost for the last two year should be submitted to this office	Total expenditure for Management, Pollution control measures, Greenbelt, CSR etc for the last two years is as below : FY 2019-2020 - 1,53,490/- FY 2020-2021 - 2,95,130/-

Please Consider the compliance status of the above mentioned conditions.

We will be highly thankful to you.

Sincerely,

Rati Pushp Intermediates Pvt. Ltd.

Abhishek Gupta
(Managing Director)



SHREE KRISHNAN ADVERTISING SERVICES PVT. LTD.

INCORPORATED IN INDIA
REGD. OFFICE: 10/1, ANNAPURNA STREET, CHENNAI - 600 002

TELEPHONE: 2222 2222, 2222 2222, 2222 2222
FAX: 2222 2222, 2222 2222, 2222 2222

ANNEXURE - I

Sl. No.	Description	Amount	Remarks
1
2
3

EXHIBIT - I

Sl. No.	Description	Amount	Rate	Quantity	Total
1
2
3

[Signature]
Date: ...



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2008, ISO 14001 : 2015 & OHSAS 18001 : 2007)

Govt. Approved Laboratory, Recognised by MOEF

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064, Ph. 011-28115459, 41848475, 9654958120
E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web : www.skaslab.com

TEST CERTIFICATE

Issued to	: M/S Rati Pushp Intermediates Pvt Ltd 8 th Km, Jansath Road, Muzaffar Nagar, Up 251001	Report No.	ENV-ST-2021080102
		Sample Received in Lab	: 08.01.2021
		Test Started on	: 08.01.2021
Nature of the Sample	: Stack Emission (Boiler – 250 kg)	Test Completed on	: 12.01.2021

Description: One Stack Sample Emission Sample monitoring was carried out on 07.01.2021.

Sampling Details:

Instrument Used for Monitoring : STACK MONITORING KIT

OFFICIAL DETAIL

Plant/Section : BOILER SECTION
Stack identification : STACK ATTACHED WITH Boiler Set
Source of Emission : BOILER –(250Kg)
Quantity of Fuel used : 7Ltrs/Hour
Emission Control (if any) : NIL

TECHNICAL Detail


Capacity : BOILER –(250Kg)
Type of Stack : MS/Circular
Diameter of stack : 225mm
Height from Ground Level : 14.0 Mtrs.
Height of sampling point from Ground Level : 3.0 Mtrs.
Type of fuel used : HSD
Normal operating schedule : AS PER REQUIREMENT
Duration of Monitoring (Minutes) : 30

Observations at Site

Ambient Temperature (°C) : 12
Stack Temperature (°C) : 156
Velocity (m/s) : 18.0
Quantity of Emission (Nm³/hr) : 1823.0
Sample Packing & Marking : Plastic Bottle & Zip Polybag, SKAS / Boiler 01

S. No.	Parameter	Results	Units	Requirements as per EPA	Test Methods
1	Particulate Matter (as PM)(at 12% CO ₂)	52.5	Mg/nm ³	150	IS 11255 (Part -1)
2	Oxide of Nitrogen (as NO ₂)	42.0	Mg/nm ³	N.S	IS-11255(Part-2)
3	Carbon Monoxide (as CO)	0.0075%	% by volume	1%	IS 13270
4	Sulphur Dioxide (as SO ₂)	30.0	Mg/nm ³	N.S	IS 11255 (Part-2)

End of Report


Analyst


Authorized Signatory

NARENDRA KUMAR GIRI



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2008, ISO 14001 : 2015 & OHSAS 18001 : 2007)

Govt. Approved Laboratory, Recognised by MOEF

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064. Ph: 011-28115459, 41848475, 8654858120
E-mail: shreekrishnalab@gmail.com, info@skaslab.com, Web: www.skaslab.com

TEST CERTIFICATE

Issued To : M/S Rati Pushp Intermediates Pvt Ltd
8th Km, Jansath Road,
Muzaffar Nagar Up 251001

Report No. ENV-N-2021080163
Sample Received in Lab : 08.01.2021

Nature of The Sample : DG Noise -(62.5KVA)

Description : Noise level Monitoring of D.G set- (62.5KVA) was carried out on 07.01.2021 & following
Leq dB (A) value were Observed.

TEST RESULTS

S. No.	Location	Unit of Measurements	Result	Requirements As per EPA	Method Reference
1.	Noise Level when canopy door is open	dB(A)	101.3		IS 9876: 1981, R 199
2.	Noise Level when canopy door is closed at a distance of 1 meter	dB(A)	71.9	75 Max.	IS 9876: 1981, R 199
3.	Insertion Loss	dB (A)	29.4	Minimum 25dB(A) Insertion Loss	

***End of Report**


Analyst


Authorized Signatory

NARENDRA KUMAR GIRI

RISK MITIGATION MEASURES

The following measures are being implemented to mitigate the risks associated with the proposed project. These measures are designed to ensure that the project is completed on time, within budget, and to the satisfaction of all stakeholders.

The project manager will be responsible for monitoring the progress of the project and ensuring that all risks are identified and mitigated. The project manager will also be responsible for reporting on the progress of the project to the steering committee.

Mitigation Measures

The following measures are being implemented to mitigate the risks associated with the proposed project:

1. The project manager will be responsible for monitoring the progress of the project and ensuring that all risks are identified and mitigated.
2. The project manager will also be responsible for reporting on the progress of the project to the steering committee.
3. The project manager will be responsible for ensuring that the project is completed on time, within budget, and to the satisfaction of all stakeholders.
4. The project manager will be responsible for ensuring that the project is completed on time, within budget, and to the satisfaction of all stakeholders.
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20. The project manager will be responsible for ensuring that the project is completed on time, within budget, and to the satisfaction of all stakeholders.

RISK MITIGATION MEASURES

Risk Assessment provides a quantitative technique for assessing the significance of the impact of any facility on its external environment, a means for highlighting key areas for greater attention and a tool for comparing alternative options, though it is no substitute for close attention to the fundamentals of safety throughout the design process or for design reviews.

For risk reduction, attempts should be made to either reduce inventories that could get released in the event of loss of containment or failure likelihoods or both as feasible. QRA identifies the dominant risk contributors, which enables prioritization of plants/section that deserve special attention in terms of inspection and maintenance in particular and over all safety management as a whole.

Mitigation Measures

Various risk mitigation measures for proposed Manufacturing and Technical services facilities are as given below:

1. The Safety Management Systems (SMS) should be introduced and followed.
2. Detailed risk assessment study should be carried out on final design and operating parameters for various components of RP Intermediates facilities.
3. Safety manual for storage and handling of hazardous chemicals should be prepared.
4. Personnel engaged in handling of hazardous chemicals should be trained to respond in an unlikely event of emergencies.
5. A written process safety information document should be compiled for general use and summary of it should be circulated to concerned personnel.
6. The document compilation should include an assessment of the hazards presented including (i) toxicity information, (ii) permissible exposure limits, (iii) physical data, (iv) thermal and chemical stability data, (v) reactivity data, (vi) corrosivity data, (vii) safe procedures in process.
7. Predictive and preventive maintenance schedules should be prepared for equipment, piping, etc. and thickness survey should be done periodically as per standard practices.
8. Safe work practices should be developed to provide for the control of hazards during operation and maintenance such as (i) tag out, (ii) confined space entry, (iii) opening process equipment or piping, (iv) control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel.
9. In the material storage area, hazardous materials should be stored based on their compatibility characteristics.
10. Near miss and accident reporting system should be followed and corrective measures should be taken to avoid / minimize near miss incidents.
11. Safety measures in the form of DO and Don't Do should be displayed at strategic locations especially in local language and English.
12. Safety audits should be conducted regularly.
13. Electrical earthing pit should be checked regularly.
14. Water sprinkler system should be provided in flammable gas storage area and it must be checked regularly.
15. Fire fighting system should be tested periodically for proper functioning.
16. All hydrants, monitors and valves should be visually inspected every month.

17. Smoke and heat detectors should be provided and these should be tested and calibrated as per schedule.
18. Adequate earthing and bonding should be provided to tanks, vessels and machineries and structures, electrical motors and other facilities.
19. Flame-proof electrical fitting should be provided in flammable gas and liquids areas, HSD/FO storage area.
20. Only authorised persons should be allowed to enter inside the flammable storage and other hazardous chemical storage area.
21. Adequate lighting in the work place should be provided with due flame proof lighting (FLP) fitting wherever required.
22. "NO SMOKING" should be declared in the entire premises.
23. It must be ensured that all safety devices provided in the plant are in good condition.
24. Disaster Management Plan should be prepared and available with concerned personnel department.

Handling of Hazards

The mitigation measures need to be considered during the handling of hazards are as follows:

1. Personal protective equipment used by the person during handling of hazardous chemicals, should be periodically replaced.
2. If any spillage of hazardous chemicals, it should be cleaned and disposed as per standard practiced and procedure described in MSDS.
3. Empty drums/bags of hazardous chemicals should be neutralized immediately.
4. Personnel engaged in handling of hazardous chemicals should be made aware of properties of hazardous chemicals.

General Working Conditions

1. House Keeping

- a. All the passages, floors and stairways should be maintained in good condition. The system should be available to deal with any spillage of dry or liquid chemical at the premises.
- b. Walkways should be clearly marked and free from obstructions.
- c. Precaution and instructions should be displayed at strategic locations in local language and in English language.
- d. All pits, sumps should be properly covered or securely fenced.

2. Ventilation

- a. Adequate ventilation should be provided in the work floor environment and storage of hazardous materials.
- b. The work environment should be assessed and monitored regularly.

3. Safe Operating Procedures

- a. Safe operating procedures should be available for storage and handling of Hazardous chemicals.
- b. The personnel should be informed of the consequences of failure to observe the safe operating procedures.

4. Work Permit System

- a. Work permit system should be followed at proposed plant facilities. Hazardous work permit should be used for hot work, electrical works, confined space entry, etc.

5. Emergency Preparedness

- a. On-site emergency plan should be prepared and readily available for an unlikely event of emergency.
- b. Emergency telephone numbers should be available and displayed properly at strategic locations.

6. Material Handling

- a. Material handling areas should be clearly defined.
- b. The personal should be made aware about the hazards associated with manual material handling.

7. Communication System

- a. Adequate communication facilities should be available and supported with uninterrupted power supply.
- b. Communication facilities should be checked periodically for its proper functioning.

8. Accident Reporting, Investigation and Analysis

- a. A system should be initiated at Rati Pushp Intermediates Pvt. Ltd. for accident and near miss reporting, investigation and analysis.

Risk Mitigation Measures for Spills

1. Minor Spills

Following measures will be taken in the event of minor spills at the facilities:

- a. Notify such immediate area.
- b. Limit access, prevent contamination spread.
- c. Survey personnel before exiting.
- d. Cover spill with absorbent material (unless liquid is flammable or oxidizing).
- e. Wipe test or survey for residual contamination as appropriate.
- f. Wash affected areas, then resurvey.
- g. Remove contaminated clothing and footwear.

- h. Package and label clean up materials for disposal.
- i. Record spill details and contamination monitoring results.
- j. Adjust inventory and waste records as appropriate.

2. *Major Spills*

Following measures will be taken in the event of minor spills at the facilities:

- a. Persons not involved in the spill should leave the area immediately.
- b. Limit the movement of contaminated personnel until they are monitored.
- c. If a spill occurs in a laboratory, leave the fume hood running to minimize release of volatile materials to adjacent rooms or hallways.
- d. Close off and secure the spill area to prevent entry.
- e. Post warning signs.
- f. Select the appropriate PPE, shielding and absorbent spill materials like absorbent paper or spill pillows if the liquid is not a flammable or oxidizing agent.

EXHIBIT - IV

DISASTER MANAGEMENT PLAN

It shall be the policy of the Board of Directors to have a disaster plan in place to ensure the continuity of operations in the event of a disaster. This plan shall be reviewed and updated annually or more frequently as needed.

The key elements of the DMP are as follows:

1. Disaster Response

1.1 Incident Response Procedures

- 1.1.1 Incident Response Procedures
- 1.1.2 Incident Response Procedures

2. Business Continuity

2.1 Business Continuity Plan (BCP)

EXHIBIT - IV

3. Risk Management

- 3.1 Risk Assessment
- 3.2 Risk Mitigation

4. Disaster Recovery Procedures

4.1 Disaster Recovery Plan (DRP)

- 4.1.1 Disaster Recovery Plan
- 4.1.2 Disaster Recovery Plan

5. Disaster Recovery Testing and Maintenance

5.1 Disaster Recovery Testing and Maintenance

6. Training

- 6.1 Training

DISASTER MANAGEMENT PLAN

In order to be in a state of readiness to face adverse effects of accidents caused by hazardous substances, a Disaster Management Plan (DMP) is prepared which includes on-site and off-site emergency plan by the individual industry as required under the Acts and Rules (Manual on Emergency Preparedness for chemical hazards, MoEF New Delhi).

The key elements of a DMP are as follows:

1. Basis of the plan
2. Accident prevention procedure / measure
3. Accident / emergency response procedure / measure; and
4. Recovery procedure

1. Basis of the Plan

- a. Identification and assessment of hazards is crucial for on-site emergency planning and requires systematically identifying what emergencies could arise in the plant. Hazard analysis or the consequence analysis (in case of catastrophic release of hazardous chemicals) is, therefore, considered as the basis of DMP.
- b. Explosion with little or no warning; hazards from blast wave, flying debris and high levels of thermal radiation (Vapour Cloud Explosion).
- c. Events involving hazardous materials.
- d. Slow or intermittent release of hazardous substances, e.g. from a leaking valve, rapid release for limited duration; due to plant failure, e.g. fracture of pipe; hazards from toxic cloud, limited in size, which may quickly disperse.
- e. It is necessary to visualize the consequences of the release of hazardous substance for the events mentioned above and the likely damage caused to the areas in and around the facility. Risk mitigation measures based on consequence analysis also form an integral part of an organized Disaster Management Plan:

2. Accidents Preventions Procedures/ Measures

Most of the accidents can arise due to fire and toxic release:

- a. Major fires with no danger of explosion. Hazards from prolonged high levels of thermal radiation & smoke.
- b. Fire threatening plant/storage containing hazardous substances; hazards from spread of fire, explosion or release of hazardous substances.
- c. Explosion with little or no warning, hazards from blast wave, flying debris and high levels of thermal radiation.

• Fire Prevention Planning and Measures

Fire is one of the major hazards that can result in disaster. Following are the important measures that require planning in the initial stage of project.

- a. Water supply
- b. Permanent fire hydrant and monitor nozzle installation

- c. Permanent foam system
- d. Permanent water fog and sprinkler system
- e. Permanent fire smothering system
- f. Mobile Fire fighting equipment
- g. First aid appliances
- h. In addition to the foregoing physical equipment for fire fighting, arrangements for fire protection in plant should include proper organization and training of workers.

- ***Fire Water Storage***

Own sources of water supply and storage facility for fire protection is recommended for the facility. The amount of water flow rate to be made available for fire fighting varies with individual hazardous conditions. The water flow rate should be adequate enough for cooling a burning tank and also adjacent tanks.

Total demand on the fire water system should also consider the water requirement for spray system for each tank. Hydrants are also desirable on the roadways and around the periphery of the tank farm. The tanks for firewater storage should be religiously reserved for this service only.

- ***Foam System***

Foam as employed for fire extinguishing is a dispersion of minute bubble within tough films of a water solution containing materials which stabilize its foam making properties. The bubbles may be filled with either carbon dioxide or air.

The action of foam in fire extinguishing is primarily one of blanketing or smothering the flame. It is light and will flow upon the surface of liquids, and thereby furnishes the most practical effective means of fire extinguishing in large liquid reservoirs such as tanks.

3. Accident/Emergency Response Planning Procedure

- a. To deal with an emergency, the arrangement for immediate deployment or appointment of key personnel with their specific duties should be clearly described and mentioned.
- b. The emergency planning includes anticipatory action for emergency, maintenance and streamlining of emergency preparedness and ability for sudden mobilization of all forces to meet any calamity. Communication links that can be established with local such as factory inspectorate, police station, fire brigade, hospital etc., State and Central authorities to meet the challenges of emergencies and ensure reliability of functions of communication system. Adequacy and efficiency of fire fighting and fire detection equipment, personal protective appliances, medical services and safety and emergency training is to be ensured.
- c. An in-plant road map showing linkage with different units, gates and emergency gates should be prepared. The plant management should display the chemical properties and antidotes of materials stored and handled and their locations and inventory. The management should also maintain data on weather conditions of each season of plant area (temperature, wind speed, wind direction), for reference during emergency for evacuation purposes.

- ***Communication***

- a. An essential component of a DMP in the Communication links necessary for gathering information needed for overall co-ordination. Emergency Control Centre links with incident scene and with in-house as well as outside emergency services. Too much reliance on the Telephone system is risky as it can soon be overloaded in an emergency situation. Radio links with a special emergency wave length failing which at least hot line between the Emergency

and hazardous locations need to be considered. A multi-user wireless paging system with selective call facility is also useful for promptly locating key operating personnel in the plant, both during normal times and during emergencies. A public address (PA) system with loud speakers installed at vital installations or corners or on jeeps can be extremely useful for guiding plant (on-site) personnel to some safe locations within the plant during emergencies. The details of the communication arrangements should include having a direct line to the fire brigade. A periodic check of this system is recommended.

- b. The description of the tasks and responsibilities, reporting place, etc. for each key functionary should be, as far as possible, so drafted as to reduce the communication needs between the interacting groups.

- ***Emergency Control Centre***

As mentioned earlier, the establishment of "EMERGENCY CONTROL CENTRE" at each unit to co-ordinate emergency response activities within a relevant area is essential.

- a. The emergency control centre should be sited in an area of minimum risk and should have easy and fast access to all major hazardous installations. It is undesirable to have alternative control centres unless it is anticipated that the control centre is likely to be affected by heat load/toxic cloud or other hazards and hence an alternative.
- b. Emergency control centres (including the alternative one) should be equipped with the following:
 - c. Adequate number of external telephones. If possible, one should accept incoming calls only, in order to bypass jammed switchboards during an emergency.
 - d. An adequate number of internal telephones.
 - e. A plan of the works showing:
 - f. Areas where there are large inventories of hazardous materials.
 - g. Sources of safety equipment.
 - h. Fire-fighting system and additional sources of water.
 - i. Site entrance and roadways, including up-to-date information on road works.
 - j. Location of the works in relation to the surrounding community.
 - k. A nominal roll of employees.
 - l. A list of KEY PERSONNEL with addresses, telephone numbers, etc.
- m. An adequate number of personal protective/safety equipment in case of hampering of smooth rescue operations.

4. Recovery Procedure

- a. It is extremely difficult to formulate recovery procedure by other organizations. Therefore, the contents of this section are indicative for the formulation of detailed recovery procedure.
- b. The duration of recovery phase will depend upon the extent of damage caused due to disaster and the interventions initiated, thereafter. The management could restore normalcy only when speedy actions on the earlier phases are initiated. Some of the issues to be included in recovery phase are:
 - c. Treatment of patients after the disaster due to psychological breakdown (operators/resident around facility).

- ***Psychological Breakdown***

- a. It has been the experience that some of the workers cannot sustain trauma due to disaster. Psychological disorder of these operators/residents is a common scene. Should the situation arise, the project management should immediately arrange for the assistance from professionals.

- ***Disaster Management Plan: On-Site Crisis***

- a. Identification of Personnel and Assessment of Responsibilities on specific functions of Co-ordinating Authority. In order to combat the emergencies, an organisational chart for on-site emergency should be periodically reviewed and updated.

- ***Emergency Preparedness Programme: Off-Site***

- a. An unexpected emergency could cause serious damage to people, livestock and property in the area. This naturally calls for the necessity for evolving an OFF-SITE emergency preparedness programme so as to combat any such possible eventuality.
- a. Many agencies are involved in combating an emergency. These include Government Departments like Public Health, Fire Services, Police, Civil Defense, Medical Services, and other voluntary organisations. The Offsite Emergency Programme (or Plan) should aim at reducing the probability and severity of the sufferings of the people and the damage to property by clearly identifying the role of each of the agencies involved in combating an emergency.

- ***Scope of the Off-Site Plan***

The scope of the OFF-SITE plan is to:

- a. Protect the inhabitation around the Hazardous Areas and evacuating them, if necessary
- b. Ensure their subsistence during the stay in camp
- c. To protect and safeguard the property and belongings of the evacuated sections of the population until their return
- d. To take adequate measures for their rehabilitation.

- ***Emergency Information System***

The first person, who observes/ identifies the incident, shall inform it as per emergency reporting system.

- ***Evaluation of Functioning of Disaster Management Plan***

- a. Emergency Preparedness, among employees of different responsibilities & levels shall be monitored through Mock Drill / Fire Drill / Emergency Evacuation Drill / Functioning of emergency reporting system, not least than once in a calendar year; to check the effectiveness of the documented Plan in the break of an actual Emergency situation.
- b. Two Senior Personnel shall be designated as the observer, who will observe the effectiveness of the plan in case of an emergency situation. They will not be assigned any other responsibility in the break out of an emergency.
- c. Feedback will be taken, and the training on Emergency Preparedness / Disaster Management Programme will be updated. As per the feedback, the EPAP will also be updated.

- d. Emergency Siren Tone
- e. Emergency siren to be operated by security person.
- f. On hearing emergency siren.
- g. Non-essential personnel shall follow safe route for evacuation. Non-essential persons will not rush towards incident site.
- h. Key/Essential Personnel shall report to respective control room.

- ***Emergency Siren Tone***

- a. FIRE : Whaling sound for two minutes
- b. ALL CLEAR : Continuous sound for three minutes

- ***Post Emergency Recovery***

- a. The post-emergency procedures discussed below are designed to successfully manage the damages/losses of an emergency event. The focus of these procedures is to move the plant back into normal operating mode as quickly and efficiently as possible.

- ***Accident Investigation***

The following guidelines will be followed to carry out accident investigation:

- a. As soon as possible after the emergency is over and plant operation has become normal, the investigation will be carried out to determine the cause of the event.
- b. Representatives from various disciplines will be members of the investigating team.
- c. The area of the event will be sealed off so that tampering or alteration of the physical evidence will not occur.
- d. Key components will be photographed and logged with time, place, direction, etc.
- e. Statements will be taken from those who were involved with the operation or who witnessed the event.

- ***Damage Assessment***

- a. This phase of recovery establishes the quantum of replacement machinery considered necessary for bringing back the plant to normal operation, property and personnel losses, and culminates in a list of necessary repair, replacement and reconstruction work. Insurance companies will be informed of the damage and requested to pay the compensation as per claim.

- ***Cleanup and Restoration***

This phase will only begin after the investigation is complete and will involve the following:

- a. Reporting documentation will be prepared and forwarded to appropriate authorities.
- b. Repairs, restoration and cleanup will begin.
- c. Insurance claims will be prepared and submitted

EXHIBIT-II













EXHIBIT-III



















EXHIBIT-IV



Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

FORM – V

(See rule14)

Environmental Statement for the financial year ending the 31st March 2023
(FY-2022-2023)

PART – A

1.	Name and address of the Owner/Occupier of the Industry, operation or process :	RATI PUSHUP INTERMEDIATES PVT LTD. 8th KM, Jansath Road , Muzaffarnagar U. P. 251001
2.	Industry Category: Primary (STC Code); Secondary (SIC Code) :	Small scale Bulk Drugs (A.P.I.'S) and Intermediates Manufacturing
3.	Production Capacity :	28.5 TPA
4.	Year of Establishment :	2012
5.	Total expenditure in Management of Pollution control measures, Greenbelt, CSR etc (in FY 2022-2023) :	5,50,714/-

PART – B

Water and Raw Material Consumption:

(I) Water Consumption(m³/day)

S.No.	Name of Products	Process water consumption per unit of product output
		During the current financial year (2022-23)
1	L- Base& D-Base	25 KL
2	Chloramphenicol Powder I.P	22 KL
3	Chloramphenicol Palmitate I.P.	75 KL
4	Domestic, Washing, Sanitization	525 KL
5.	Boiler, Cooling etc.	685 KL
6.	Gardening	1200 KL
	Total Water Consumption in FY 2022-2023	2532 KL

Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

(II) Raw Material Consumption:

S.No.	Name of Products Manufactured	Name of raw materials	Consumption of raw material
			During the financial year (2022-2023) in KG
1.	1. D- Base 2. L- Base 3. Chloramphenicol powder I.P. 4. Chloramphenicol Palmitate I.P.	S- Base	12000 Kg
2.		Hydrochloric Acid (Hcl)	4105 Kg
3.		Sodium Hydroxide (NaOH)	3010 Kg
4.		Methyl Dichloro Acetate	12471 Kg
5.		IsoPropyl Alcohol	9485 Kg
6.		Palmitoyl Chloride	2134 Kg
7.		Acetone	6402 Kg
8.		Pyridine	854 Kg

PART – C

Pollution discharged to environment/unit of output (Parameter as specified in the consent issued)

Sl. No.	Pollutants	Quantity of Pollutants discharge (mass/day)	Concentration of Pollutants discharged (mass/volume)	Percentage of variation from prescribed standards with reasons.	
a.	Treated Water (from ETP)	0.00	0.00	Plant is designed for zero discharge by adopting solar evaporation for treated water by ETP. All Parameters for treated water are well within the limits.	
		Parameter	Results		
		pH	7.13		
		Total suspended solids	32.6 mg/l		
		COD	172.0 mg/l		
		BOD	23.0 mg/l		
Oil & Grease	2.3 mg/l				

Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

b.	Air (Ambient Air Quality Monitoring & Stack Emission Monitoring)	Parameter	Result	Particulate matters value are well within the prescribed limits stipulated by concerned regulatory authorities.
		Particulate Matter (PM)	51.4 Mg/NM3	
		Oxide of Nitrogen (NO ₂)	38.9 Mg/NH3	
		Sulphur Dioxide (SO ₂)	28.4 Mg/NM3	
		Carbon Monoxide (CO)	0.0062 % by volume	

PART – D

Hazardous Wastes: (Disposed to Bharat oil waste management ltd, U.P. on Form 10)

(As specified under Hazardous Waste (Management, Handling & Transboundary Movement) Rules, 2008 amended till date.

Sl. No.	Hazardous Waste	Total Quantity (Kg.)
		During the current financial year (2022-23)
a.	From Process	
(i)	ETP Sludge	325.3 Kg
(ii)	Used Packing Material (Polybags, paper material etc.)	203.8 Kg
(iii)	Cotton rags, cloths, cleaning material etc.	33.4 Kg
(iv)	Used rubber waste	22 Kg
(v)	Spent carbon	NIL
b.	From Pollution Control facilities	NIL

Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

PART – E

Solid Wastes:

Sl. No.	Solid Waste	Total Quantity (Kg.)
		During the current financial year (2022-23)
a.	From Process	Nil
b.	From Pollution Control facilities	Nil
c.	Quantity recycled or reutilized	Nil

PART – F

Please specify the characterization (in terms of composition & quantum) of hazardous as well as solid wastes and indicate disposal practice adopted for both these categories of wastes.

Sl. No.	Description of Hazardous Waste	Qty. of waste generated during the year	Disposal Method
1.	Used /Spent Oil	25Ltr	Sold to authorized Recycler.
2.	Used Grease	NIL	

Other Solid Waste:

Sl. No.	Description of Waste	Qty. of waste generated during the year	Disposal Method
1	Scrap (Iron, steel, Aluminum Etc.)	425 Kg	Sold to authorized vendor/Recyclers
2	Old & used I.T. materials	NIL	
3	Used HTPE Barrels and Container, Polythenes etc.	910 Kg	

Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

PART – G

Impact of the pollution abatement measures taken on conservation of natural resources and on the cost of production.

1. Extensive tree plantation have been already done, which is still continuing till also as a part of greenbelt development, which will control the impact of Air Pollution and optimize the ambient temperature of surrounding area.
2. We have constructed the rain water harvesting ponds in our plant premises to recharge ground water.
3. Treated wastewater is evaporated by solar evaporation to follow the zero liquid discharge policy at the company.
4. Rain water harvesting in the form of conservation of monsoon run off, reuse and recycle of water in the plant has already been started. Effect of which is seen in the form of dilution of ground water EC in near vicinity.

Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

PART – H

Additional measures / investment proposal for environmental protection including abatement of pollution/prevention of pollution.

- 1) Development of greenbelt in & around the plant regular plantation is done on regular intervals.
- 2) Water is used for spraying in the plant area as well as the nearby regularly for dust suppression.
- 3) Cleaning of roads & floor area within the plant is done regularly by using Industrial mobile vaccum cleaner.
- 4) Energy efficient T5 lamps for energy conservation LED Lights for energy conservation are used in all plant premises.
- 5) Suitable interlocks have been provided for Gear box & Girth Gear Cooling fans to avoid idle running of these fans.
- 6) Installation of Trip starter and good quality cable and accessories are used in Water Pumps & automation of plant water supply system, resulting in reduction of Power consumption of Plant water supply system.
- 7) For better control on fugitive emission, water spraying is being done on unpaved internal roads except during rainy season.
- 8) Adoption of good House-Keeping practices, in which proper & systematic stacking & movement of construction materials, packing material etc. has been implemented.
- 9) All the internal roads have been made pucca in order to reduce dust.
- 10) ETP has been installed to treat domestic / industrial wastewater.

Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar U.P. 251001

PART – I

Any other particulars for improving the quality of the environment.

Environment Management System Improvement:

- 1) Quarterly EHS inspection of all the sections through the plant premises.
- 2) Awareness promotion through various environmental training, environmental competitions, presentations etc. on World Environment Day, Energy Conservation Day etc.
- 3) Water sprinkling on the unpaved surface for dust suppression.
- 4) Development of greenbelt in & around the plant. The tree species planted are Neem, Mango, Litchi, Black Jamun, Green Hedge, Coloured Hedge, Royal Plam, Areca Plam, Red Bottle Brush, Ashoka, Gulmohor, Night Jasmine. These are ground 600-700 flower pots also planted according to all the reasons.
- 5) Proper lubrication and housekeeping to avoid excessive noise generation.
- 6) Training on EMS to all employees and contract labours to create awareness.
- 7) Various sapling has been planted and further greenbelt work is under progress.
- 8) Only PUC certified vehicles are engaged.
- 9) Surface and ground water quality, ground water level is being done in our own laboratory.
- 10) Audit by site team have been conducted to improve environment management system.
- 11) World environment day, Earth day, world water day also were celebrated in our plant.

EXHIBIT-V

PROPOSED EFFLUENT TREATMENT PLANT WITH SOLAR EVAPORATOR

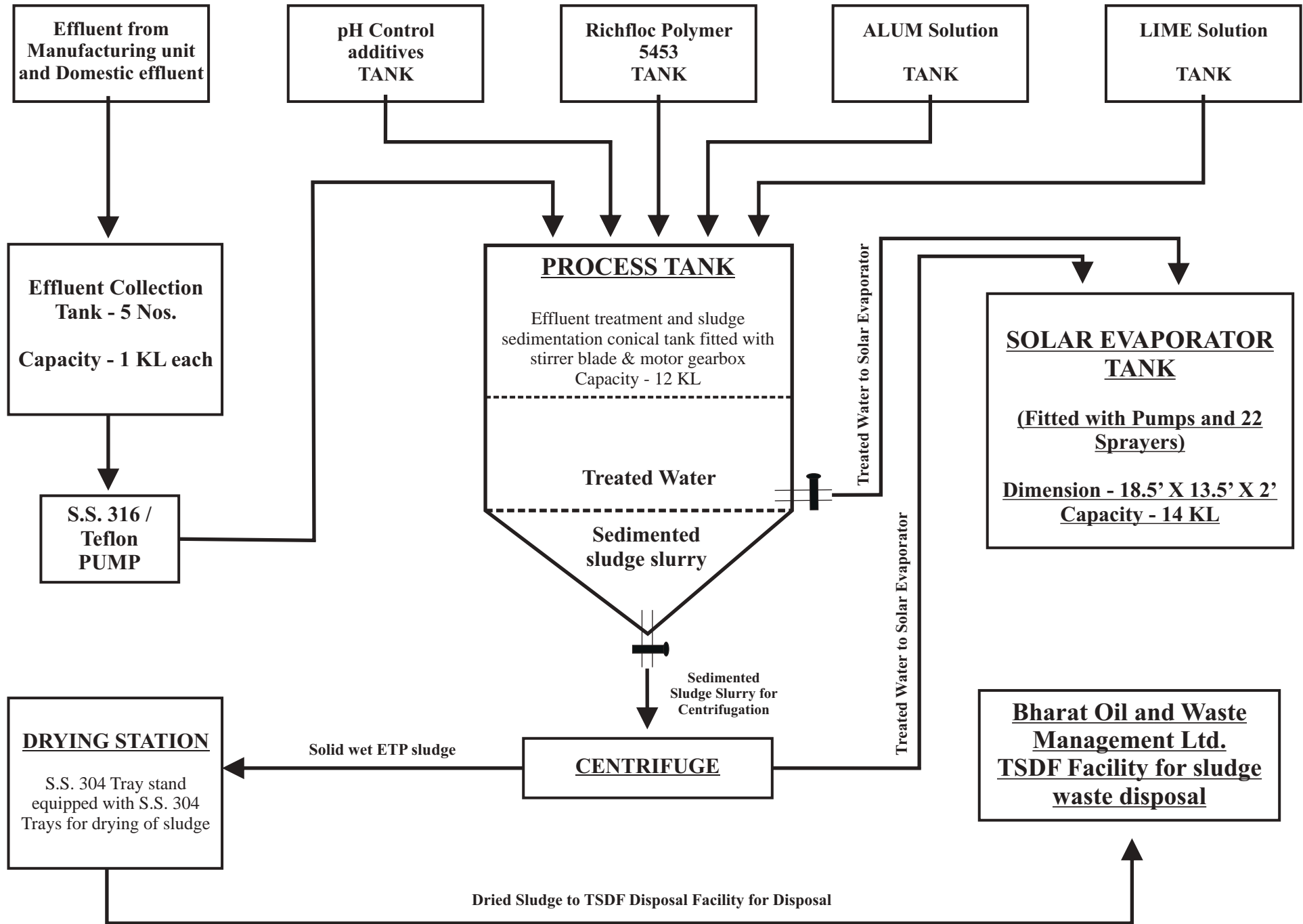


EXHIBIT-VI



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, ISO 14001 : 2015 & ISO 45001 : 2018 Certified & MoEFCC Recognised Laboratory)

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064, Ph. : 011-28115459, 41848475, 9654958120

E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web. : www.skaslab.com

GOVT. APPROVED TESTING LABORATORY

REPORT OF ANALYSIS

Issued To	RATI PUSHUP INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001 UP	Report No	ENV-180523003
		Date of sample Received	18/05/2023
Nature of the Sample	ETP TREATED WATER	Test Started On	18/05/2023
Sample Code	NA	Test Completed on	23/05/2023
Customer Ref. No	Nil	Date of Report Issued	23/05/2023

SAMPLING & ANALYSIS DATA

Sample Drawn By : Mr. Kuldeep
Date Of Sampling : 17/05/2023
Sampling Location : ETP Plant
Sampling Co-Ordinates : NA
Sample Quantity : 2 Ltr + 500 ml
Sample packing Details : Plastic Bottle & Glass Bottle
Sampling Method : IS: 17614 (P-3)
Environmental Conditions : Normal

TEST RESULTS

S.No.	Test Parameters	Units	Results	Limits	Method
1	pH	-	7.18	5.5 to 9.0	IS : 3025 (P-11)
2	Total Suspended Solids (as TSS)	mg/l	39.5	100	IS : 3025 (P-17)
3	Oil & Grease	mg/l	2.7	10	IS : 3025 (P-39)
4	Biochemical Oxygen Demand(for 3 days at 27 °C) (as BOD)	mg/l	24.1	30	IS : 3025 (P-44)
5	Chemical Oxygen Demand (as COD)	mg/l	176.0	250	IS : 3025 (P-58)

Remarks : Note :- Party asked for the above tests only.

End of Report


Analyst




Authorized Signatory

VINAY KUMAR

EXHIBIT-VII

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8TH KM., JANSATH ROAD, MUZAFFARNAGAR, U.P. -251001

RECORD FOR ENVIRONMENTAL TRAINING PROGRAM OF EMPLOYEE

Date - 16/10/23

S. No.	Aspects	Remarks (if Any)	Training Given to the Employees	Attendance of Employees	Signature of Employees
1	Chemical / Solvents handling aspects like operating S.S Pumps for transferring chemicals to reactors without any spillage, operating Drum litters etc.	ok.	Vinay Sharma Mohit Sharma Devrat Tiagi Prashant Kumar	P P P P P	
2	Proper storage of chemicals / Solvents without any leaks and spillage.	ok.	Kapil	P	
3	Training regarding proper sanitization, cleaning/washing aspects of all plant premises and machinery equipments, usage of PPE'S including Aprons / Gowns, Mask, Gloves, Head Caps, chemicals resistant shoes etc.	ok.	Vikash Lakhsaya Arvush Ajay Anuj	P P P P P	
4	Green Belt Maintenance and Development	ok.	Vipin Cuddu	P P	
5	Air Pollution related aspects like Stacks of Boiler, DG sets, Monitoring, Sprinkling of water on roads for cleaning and elimination of dust etc	ok.	Anil Pravinder Bitto	P P P	
6	Water Pollution related aspects like water treatment by effluent treatment Plant (ETP.), ETP sludge management etc.	ok.	Shivkumar Rahul Ankur	P P P	
7	Noise Pollution related aspects like Acoustic system provided for noise reduction in Boiler & DG sets.	ok.	Krishan	P	
8	Water Disposal and management such as Disposal of ETP Sludge, Used Packaging materials, used filters, HDPE Drums, E-wastes etc. to the authorized dealers.	ok.	Vinit	P	
9	Rain water Harvesting	ok.	/	/	/
10	Encouragement for new tree plantation and importance of environment in our society.	ok.	/	/	/

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8TH KM., JANSATH ROAD, MUZAFFARNAGAR, U.P. -251001

RECORD FOR TRAINING OF EMPLOYEE

Date - 16/10/23

S. No.	Aspects	Remarks (if Any)	Training Given to the Employees	Attendance of Employees	Signature of Employees
11	Importance of CSR Activities.	ok.	/	/	/
12	Importance of cleaning and other eco-developmental activities in the entire plant and surrounding of plant premises.	ok.	/	/	/


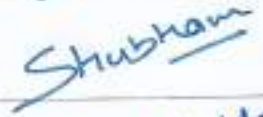
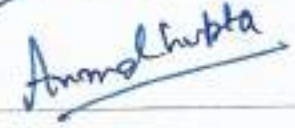
TRAINING GIVEN BY		
S. NO.	NAME	SIGNATURE
1	ABHISHEK GUPTA	
2	SHUBHAM GUPTA	
3	ANMOL GUPTA	

EXHIBIT-VIII



GROUND WATER DEPARTMENT

(Namami Gange & Rural Water Supply Department)

Ministry of Jal Shakti

Government of Uttar Pradesh

Form 8 (C)

[See Rule 8(1)]

AUTHORIZATION/ NO-OBJECTION CERTIFICATE FOR SINKING OF NEW / EXISTING WELL FOR INDUSTRIAL/ COMMERCIAL/ INFRASTRUCTURAL OR BULK USER OF GROUND WATER

[Under Section 14 of the Uttar Pradesh Ground Water Management and Regulation Act, 2019.]

AUTHORIZATION/ NO-OBJECTION CERTIFICATE NO: NOC031827

VALID FROM 15/09/2021 TO 14/09/2026

{UIS10(1) of the Uttar Pradesh Ground Water Management and Regulation Act, 2019}

Registration No.: 202108000779			
Name of the Owner	ABHISHEK GUPTA		
Designation पद	DIRECTOR	Company Name कंपनी का नाम	RATI PUSHP INTERMEDIATES PRIVATE LIMITED
Company Address कंपनी का पता	8 KM STONE, JANSATH ROAD MUZAFFARNAGAR	Authorization Letter प्राधिकार पत्र	Download
Address of the Applicant	8TH KM STONE, JANSATH ROAD, MUZAFFARNAGAR, U.P.	Application Form Serial No.	MZFN0821NIN0051
Date of Submission	25/08/2021	Specimen Signature	
Location Particulars			
District	Muzaffar Nagar	Block	MUZAFFARNAGAR
Plot No./Khasra No.	8 KM STONE, JANSATH ROAD MUZAFFARNAGAR	Municipality/Corporation	No
Ward No./Holding No.			N/A
Particular of the Existing Well and Pumping Device			
Date of Construction/Sinking of the Well	01/04/2013		
Type of Well	Tube Well/Boring	Depth of the Well (In meter)	70.00
Purpose of well	Industrial	Assembly Size(For Tube Well)	
Strainer Position (For Tube Well)			
Type of Pump Used	Submersible	H.P. of the Pump	1.00
Operational Device	Electric Motor	Rate of Withdrawal (m³/hr.)	5.00
Date of Energization (In Case of Electric Pump)		01/04/2013	
Maximum Allowable Rate of Withdrawal (m³/hr.):	5.00	Maximum Allowable Running Hours Per Day:	3.00

This No-Objection certificate authorizes the owner applicant (user) to sink a well in the location specified at Sl. (2) for extraction of ground water at a rate not exceeding that as shown at Sl. (3j), for Running Hours per day as shown at Sl. (3k), and for maximum allowable annual extraction of ground water as shown at Sl. (3k) and is valid subject to the observance of the conditions stated overleaf.

GENERAL CONDITIONS:

- In case of any change of ownership of the proposed well, fresh authorization has to be obtained.
- No change of location, design, rate of withdrawal and pumping device in respect of the proposed well as indicated at SL (2) and (3) of this certificate shall be made without prior permission of the Competent Authority. Any deviation in this regard shall lead to cancellation of this authorization
- For the purpose of measuring and recording the quantity of ground water extracted, every said user shall affix digital water flow meters (conforming to BIS/ IS standards) having telemetry system in the abstraction structure, which record rate and quantum of extraction, at outlet of pumping devices and it shall be presumed that the quantity recorded by the meter has been extracted by the said user, until the contrary is proved. The rate of extraction of ground water from the well as shown in item 3(k) shall not exceed to the recorded rate from water meters
- The concerned Authority reserves the right to stop extraction of ground water from the well due to quality hazards or any other reasons, if the situation so demands
- In case of any change of ownership of the existing well, fresh registration has to be obtained.
- No change of location, design, rate of withdrawal and pumping device in respect of the existing well as indicated at Sl. (2) and (3) of this certificate shall be made without prior permission of the Competent Authority. Any deviation in this regard shall lead to cancellation of this registration
- In case, any of the particulars / information furnished by the applicant in his application for issuance of this registration is found to be incorrect during verification at any subsequent stage, this registration is liable for cancellation.
- The Certificate of Authorization/ NOC shall be valid for a period of five years from the date of issue. The applicant shall have to apply for renewal through a fresh application, at least ninety days prior to expiry of its validity.
- Construction of piezometers and installation of digital water level recorders with telemetry shall be mandatory for user. Depth and zone tapped of piezometer should be commensurate with that of the pumping well. The data, obtained from digital water level recorders shall be made available to this office on monthly basis
- **Guidelines for Installation of Piezometers and their Monitoring**

Piezometer is a borewell /tubewell used only for measuring the water level by lowering the tape/ sounder or automatic water level measuring equipment. It is also used to take water sample for water quality testing when ever needed. General guidelines for installation of piezometers are as follows:

- The piezometer is to be installed/constructed at the minimum of 50 m distance from the pumping well through which ground water is being withdrawn. The diameter of the piezometer should be about 4" to 6".
- The depth of the piezometer should be same as is case of the pumping well from which ground water is being abstracted. If, more than one piezometers are installed the second piezometer should monitor the shallow ground water regime. It will facilitate shallow as well as deeper ground water aquifer monitoring.
- No. of piezometers to be constructed & Type of water level monitoring mechanism shall be as per below table:

S.No	Quantum of Ground water withdrawal (cum/day)	No.of piezometers required	Monitoring Mechanism	
			Manual	DWLR with Telemetry
1	< 10	0	0	0
2	11 - 50	1	1	0
3	50- 500	1	0	1
4	> 500	2	0	2

- The measuring frequency should be monthly and accuracy of measurement should be up to cm. the reported measurement should be given in meter upto two decimal.
- For measurement of water level sounder or automatic water level recorder (AWLR)/ Digital Automatic water level recorder (DWLR) with telemetry system should be used for accuracy.
- The measurement of water level in piezometer should be taken, only after the pumping from the surrounding tube wells has been stopped for about four to six hours.
- All the details regarding coordinates, reduced level (with respect to mean level), depth, zone taped and assembly lowered should be provided for bringing the piezometer into the Hydrograph Monitoring System for Ground Water Department, Uttar Pradesh, and for its validation.
- The ground water quality has to be monitored twice in a year during pre-monsoon (May/June) and post-monsoon (October/November) periods. Quality may be got analyzed from NABL approved lab. Besides, one sample (1 lt capacity bottle) to the concerned Director, Ground Water Department, Uttar Pradesh, for chemical analysis.
- A Permanent display board should be installed at piezometer/Tube wells site for providing the location, piezometer/ tube well number, depth and zone tapped of piezometer/tube well for standard referencing and identification.

- Any other site specific requirement regarding safety and access for measurement may be taken care of.
- Any other condition(s) that may be imposed by the concerned Authority.
- In case, any of the particulars I information furnished by the applicant in his application for issuance of this permit is found to be incorrect during verification at any subsequent stage, this permit is liable for cancellation.
-
- **SPECIFIC CONDITIONS:**
- **(A) For Industrial User:** No Objection Certificate for ground water extraction by industries shall be granted subject to the following specific conditions:
 - i) No Objection Certificate shall be granted only in such cases where local government water supply agencies are not able to supply the desired quantity of water.
 - ii) All industries shall be required to adopt latest water efficient technologies so as to reduce dependence on ground water resources.
 - iii) All industries abstracting ground water in excess of 100 m³/d shall be required to undertake annual water audit through Confederation of Indian Industries (CII)/ Federation Indian Chamber of Commerce and Industry (FICCI)/ National Productivity Council (NPC) certified auditors and submit audit reports within three months of completion of the same to Ground Water Department Uttar Pradesh. All such industries shall be required to reduce their ground water use by at least 20% over the next five years through appropriate means.
 - iv) Construction of observation well(s) (piezometer)(s) within the premises and installation of appropriate water level monitoring mechanism as mentioned in General Condition no.10 shall be mandatory for industries drawing/ proposing to draw more than 10 m³ /day of ground water and. Monitoring of water level shall be done by the project proponent. The piezometer (observation well) shall be constructed at a minimum distance of 50 m from the bore well/production well. Depth and aquifer zone tapped in the piezometer shall be the same as that of the pumping well/ wells. Monthly water level data shall be submitted online to the Ground Water Department, UP.
 - v) The proponent shall be required to adopt roof top rain water harvesting/ recharge in the project premises. Industries which are likely to pollute ground water (chemical, pharmaceutical, dyes, pigments, paints, textiles, tannery, pesticides/ insecticides, fertilizers, slaughter house, explosives etc.) shall store the harvested rain water in surface storage tanks for use in the industry.
 - vi) Injection of treated/ untreated waste water into aquifer system is strictly prohibited.
 - vii) Industries which are likely to cause ground water pollution e.g. Tanning, Slaughter Houses, Dye, Chemical/ Petrochemical, Coal washeries, other hazardous units etc. (as per CPCB list) need to undertake necessary well head protection measures to ensure prevention of ground water pollution.
-
- **(B) Infrastructural User:** The No Objection Certificate for ground water abstraction will be granted subject to the following specific conditions:
 - i) In case of infrastructure projects that require dewatering, proponent shall be required to carry out regular monitoring of dewatering discharge rate (using a digital water flow meter) and submit the data online to Ground Water Department, UP as applicable. Monitoring records and results should be retained by the proponent for two years, for inspection or reporting as required by District Ground Water Management Council.
 - ii) Installation of Sewage Treatment Plants (STP) shall be mandatory for new projects, where ground water requirement is more than 20 m³ /day. The water from STP shall be utilized for toilet flushing, car washing, gardening etc

Date :06/12/2021

Place:Muzaffar Nagar

This certificate is electronically generated and does not require digital signature

EXHIBIT-IX

श्रवण देव क्लीनिक

- प्रमाणित चिकित्सा अधिकारी :
पंजाब नेशनल बैंक,
भारतीय जीवन बीमा निगम,
मुजफ्फरनगर ।
- परामर्श चिकित्सक :
ग्रेन कैंबर प्रसूति चिकित्सालय,
नई मण्डी, मुजफ्फरनगर ।
- सुविधायें उपलब्ध :
- ई० सी० जी
- खून में शुगर (ब्लड शुगर) की
जोब इलेक्ट्रॉनिक मशीन द्वारा
- भर्ती की सुविधा
- क्लीनिक पर मिलने का समय :
प्रातः 10.00 से 3.00 बजे
सायं 5.30 से 8.00 बजे
80 बी., नई मण्डी, मुजफ्फरनगर।
- घर पर मिलने का समय :
प्रातः 8.00 से 9.30 बजे
तारिका हाऊस, 50/1, सिविल
साईन दक्षिणी, मुजफ्फरनगर ।

कृपया यही बर्बाई स्टोर से ले जो कि
लिखी गई है।

- इस पर्चे पर 10 दिन में एक बार
और दिखा सकते हैं।

अवकाश - रविवार सायं

डा० तारा मोहन

बी.एस.सी., एम.बी.बी.एस., एम.डी.
ए.आर.एस.ओ.पेडि. (इन्फैंट), आई.एम.ए.सी.ओ.पी.
परामर्श चिकित्सक



क्लीनिक 2608201
निवास 2622949

फ़ोन नं० : एम. पैड. एम./ए. नं./01795

10.12.2022

- I have been retained as medical
consultant for M/c Rati Pump Inter-
- mediated Pvt. Ltd., Pusseli Rd.,
Muzaffarnagar.

Tara Mohan
10/12/22

Dr. Taramohan
MBBS MD
IMACGP ARSO Med
Reg No - MCI/0135
Authorised Doctor
Punjab National Bank
LIC of India
Muzaffarnagar

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : MR. ABHISHEK GUPTA (Mfg. Chemist)

FATHER'S NAME : SH. ATUL KUMAR GUPTA

AGE : 33 YEAR.

DATE : 18/11/2023

It is to be certified that Shri ABHISHEK GUPTA son of SH. ATUL KUMAR GUPTA


Whose signature is given below is quite fit to do any work and his duties.

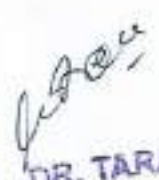
As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Manoj Kumar
Director


Candidate's Signature


DR. TARMOHAN
M.B.B.S., M.D., B.A. CGP, ARSO Mem
Regn. No. - MCI0136
Authorized Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : MOHIT KUMAR (Analytical Chemist)

FATHER'S NAME : SH. RICHPAL SINGH

AGE : 35 YEAR

DATE : 18/11/2023

It is to be certified that Shri MOHIT KUMAR son of SH. RICHPAL SINGH

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.


Managing Director


Candidate's Signature


DR. TARMOHAN
M.B.B.S., M.D., BIA CBP, ARSO M-
Regn. No -MCU0135
Authorised Doctor
National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : VINESH KUMAR
FATHER'S NAME : SH. MANGOO SINGH
AGE : 33 YEAR.
DATE : 18/11/2023

It is to be certified that Shri VINESH KUMAR son of SH. MANGOO SINGH

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Mahesh Kumar


Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., M.A. CGP, APHO
Regn. No. -MCU0135
Authorised Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : AJAY KUMAR

FATHER'S NAME : SH. SATYA PAL SINGH

AGE : 34 YEAR

DATE : 18/11/2023

It is to be certified that Shri AJAY KUMAR son of SH. SATYA PAL SINGH

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.



Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., B.A. CGP, 1983
Reg. No. 406125
Authorised Doctor
Punjab National Bank
Muzaffarnagar-251004

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : PRASHANT KUMAR

FATHER'S NAME : SH. ANIL KUMAR

AGE : 30 YEAR.

DATE : 18/11/2023

It is to be certified that Shri PRASHANT KUMAR son of SH. ANIL KUMAR

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.



P. Kumar
Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., #AA CGP, AR 50
Registration No - MC10135
Assistant Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : DEVVRAT TYAGI
FATHER'S NAME : SH. RAJENDRA PRASAD TYAGI
AGE : 32 YEAR.
DATE : 18/11/2023

It is to be certified that Shri DEVVRAT TYAGI son of SH. RAJENDRA PRASAD TYAGI

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.
Muzaffarnagar
Signature of
Muzaffarnagar

Signature
Candidate's Signature

DR. TARAMOHAN
M.B.B.S., M.D., B.A. CSE, ARSO Med
Regn. No. - 15110136
Registered Doctor
Punjab National Bank
Muzaffarnagar-251004

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : VINIT GUPTA

FATHER'S NAME : SH. RAM KISHAN

AGE : 46 YEAR.

DATE : 18/11/2023

It is to be certified that Shri VINIT GUPTA son of SH. RAM KISHAN

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.


Vinit Gupta

विनित गुप्ता
Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., #14 GGP, AMO
Regn. No. MCM1136
Authorised Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : KRISHANA KUMAR

FATHER'S NAME : SH. SARARSVEER

AGE : 39 YEAR.

DATE : 18/11/2023

It is to be certified that Shri KRISHANA KUMAR son of SH. SARARSVEER

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.



Krishana
Candidate's Signature



DR. TARAMOHAN
M.B.B.S., M.D., M.A. CGP, AR, SO MIB
Doctor's Signature
Auth. No. 40C10135
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : ANKUR

FATHER'S NAME : SH. RAJ SINGH

AGE : 30 YEAR

DATE : 18/11/2023

It is to be certified that Shri ANKUR son of SH. RAJ SINGH


Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Manoj Kumar
Director


Ankur
Candidate's Signature


DR. TARMOHAN
M.B.B.S., M.D., M.A. C.S.M., M.C.S.P.
Regn. No. 42013
Authorized Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : RAHUL KUMAR

FATHER'S NAME : SH. CHANDRA BOSH

AGE : 31 YEAR.

DATE : 18/11/2023

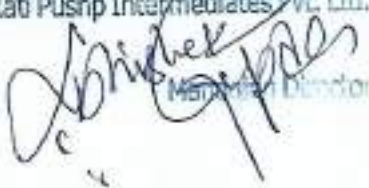
It is to be certified that Shri RAHUL KUMAR son of SH. CHANDRA BOSH

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : ~~DONE / NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Director


Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., BAA CGP APWG Dist
Regn. No. -MCU0134
Registered Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : SHIVKUMAR

FATHER'S NAME : LATE. RAMESH

AGE : 36 YEAR.

DATE : 18/11/2023

It is to be certified that Shri SHIVKUMAR son of LATE. RAMESH.

Whose signature is given below is quite fit to do any work and his duties.

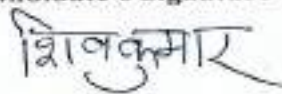
As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT-DONE

For Rati Pushp Intermediates Pvt. Ltd.



Candidate's Signature




DR. TARANOHAN
M.S.B.S. Regd. SJA CGP ARSO Med
Authorized Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : BITT00

FATHER'S NAME : SH. JAGDISH SINGH

AGE : 20 YEAR.

DATE : 18/11/2023

It is to be certified that Shri BITT00 son of SH. JAGDISH SINGH

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.



Bittoo

Candidate's Signature



DR. TARAMOHAN
B.S., M.D., MA CGP, ARND
Regn. No. - MC/0135
Recognised Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : GUDDU

FATHER'S NAME : SH. KAVINDRA

AGE : 31 YEAR.

DATE : 18/11/2023

It is to be certified that Shri GUDDU son of SH. KAVINDRA

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.



GUDDU
Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., MA. CGP, APSC MA-1
Regn. No. MC/101/89
Authorised Doctor
Muzaffarnagar National Bank
Muzaffarnagar-251001

Doctor's Signature

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : VIPIN KUMAR

FATHER'S NAME : SH. OM BIR

AGE : 23 YEAR.

DATE : 18/11/2023

It is to be certified that Shri VIPIN KUMAR son of SH. OM BIR.

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Manager

Vipin Kumar
Candidate's Signature


DR. TARAMOHAN
Doctor's Signature
M.B.B.S. M.D. (M.C.)
Registration No. - MCD/125
Aurobindo Hospital
Muzaffarnagar-251004

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : KAPIL SHARMA
FATHER'S NAME : SH. SUDHIR SHARMA
AGE : 25 YEAR.
DATE : 18/11/2023

It is to be certified that Shri KAPIL SHARMA son of SH. SUDHIR SHARMA

Whose signature is given below is quite fit to do any work and his duties.


As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : ~~DONE~~ / ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Director


Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., B.A. CGP, ARSO (Med.)
Regn. No. - MC10135
Authorized Doctor
Pushp National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. – 251001

MEDICAL FITNESS

NAME : ANUJ KUMAR

FATHER'S NAME : SH. SURAJMAL.

AGE : 21 YEAR.

DATE : 18/11/2023

It is to be certified that Shri ANUJ KUMAR son of SH. SURAJMAL.

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : ~~NOT-DONE~~

For Rati Pushp Intermediates Pvt. Ltd.



ANUJ KUMAR
Candidate's Signature


DR. TARMOHAN
M.D., M.A. CGP, A.P. 80, May
No. 140/0135
Punjab Postal Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : AJAY KUMAR
FATHER'S NAME : SH. KARAM CHAND SAINI
AGE : 38 YEAR.
DATE : 18/11/2023

It is to be certified that Shri AJAY KUMAR son of SH. KARAM CHAND SAINI

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / ~~NOT DONE~~

For Rati Pushp Intermediates Pvt. Ltd.


Director

Ajay
Candidate's Signature


DR. TARAMOHAN
M.B.B.S., M.D., M.A. C.S.P. AMR90-18/19
Regd. No. 14010134
Authorised Medical Officer
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : AVNEESH

FATHER'S NAME : SH. SANJAY.

AGE : 28 YEAR.

DATE : 18/11/2023

It is to be certified that Shri AVNEESH son of SH. SANJAY.

Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.


Director

अवनीश
Candidate's Signature


DR. TARANDEVI
M.B.B.S. M.D., B.A. CGU, ARSO/MS
Reg. No. MCI/154
Punjab Natl. of Health
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : LAKSHYA KUMAR
FATHER'S NAME : SH. JITENDRA KUMAR
AGE : 21 YEAR.
DATE : 18/11/2023

It is to be certified that Shri LAKSHYA KUMAR son of SH. JITENDRA KUMAR


Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT-DONE

For Rati Pushp Intermediates Pvt. Ltd.


Muzaffarnagar, U.P.


Candidate's Signature


DR. TARAMOHAN
M.B.B.S. M.D., B.A. CSP, ARSO M.L.S.
Authorised Doctor
Punjab National Bank
Muzaffarnagar-251001

RATI PUSHP INTERMEDIATES PRIVATE LIMITED

8th km. Jansath Road, MUZAFFARNAGAR U.P. - 251001

MEDICAL FITNESS

NAME : VIKASH KUMAR

FATHER'S NAME : SH. PRAMOD KUMAR

AGE : 36 YEAR.

DATE : 18/11/2023

It is to be certified that Shri VIKASH KUMAR son of SH. PRAMOD KUMAR

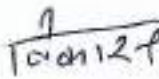
Whose signature is given below is quite fit to do any work and his duties.

As I examined him, he is not suffering from any communicable diseases and is also not sensitive for penicillin test.

COVID VACCINATION : DONE / NOT DONE

For Rati Pushp Intermediates Pvt. Ltd.




Candidate's Signature


DR. TARAMONI
B.S., M.D., MA (GP), MCO (I) 13
Authorised Doctor
Pushp National Bank
Muzaffarnagar-251001

EXHIBIT-X

OFFICE OF THE COMMISSIONER, FOOD SAFETY & DRUG ADMINISTRATION, U.P.
District - MUZAFFARNAGAR

Certificate No. : AGMU000913L

Date **14/01/2023**

This is to certify that M/s RATI PUSHP INTERMEDIATES PVT LTD, 8 KM JANSATH ROAD,,MUZAFFAR NAGAR,MUZAFFAR NAGAR, MUZAFFARNAGAR, Uttar Pradesh,251001 have been granted following licence(s) to manufacture for sale or for distribution of drugs under the provisions of Drugs and Cosmetics Act, 1940 and Rules there under –

Licence Form	Licence No.	Licence Issue Date	Licence Validity	Product Category
Form 28	UP12280000006, UP12280000006	14/01/2023	19/12/2027	

The firm has submitted retention fee for the period of five years.

The above mentioned licence(s) is/are valid for the period mentioned in above table under the provisions of Drugs and Cosmetics Rules, 1945, as amended vide GSR No. 1337 (E) dated: 27.10.2017, subject to conditions of licence and provisions of Drugs & Cosmetics Act, and Rules made there under.

Notes: This certificate is auto generated by computerized system based on information fed by user, hence need no signature.

EXHIBIT-XI



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF ACTIVE PHARMACEUTICAL INGREDIENTS/AIP'S/INTERMEDIATES

Works: 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P.) INDIA • Mobile : 9837473348
Postal Add : Ramji sadan, 494-95, Kambalwala Bagh, New Mandi
Muzaffarnagar-251001 (U.P.) INDIA
E-Mail : ratipushp@yahoo.com • Website : www.ratipushp.com

22nd Feb, 2021

To,

Sh. Sharath Kumar Pallerla (Director)
(I.A. Division)
Ministry of Environment, Forest & Climate Change
Indra Paryavaran Bhavan
Jorbagh Road, Aliganj
New Delhi 110003

Subject: Implementation of wildlife Conservation Plan -reg.

Dear Sir,

With reference to MOEF & CC office memorandum F. N0. IA-J-11014/1/2021-IA-I, dated 5th January 2021, the implementation of the wildlife management plan is not applicable to our project.

There is no wildlife sanctuary located within 10 km area of our project site. Further as per the EC letter issued by SEIAA Uttar Pradesh vide letter no. 191/Parya/SEIAA/5667/2019 dated 7th July 2020 (Copy of EC Letter attached as Annexure) to M/s Rati Pushp Intermediates Pvt. Ltd. Conservation Plan/Wildlife Management Plan is only applicable in case of the presence of Schedule-I species in the study area.

This is to inform you that, there is no Schedule-I species present within the 10 km area of M/s Rati Pushp Intermediates Pvt. Ltd. Hence, **Implementation of wildlife Conservation Plan** not applicable to our Project.

I request you to kindly consider the report. I will be highly thankful to you.

Thanking you,

Sincerely,

M/s RATI PUSHP INTERMEDIATES PVT. LTD.

(Managing Director)



Enclosures : Copy of EC Letter issued by SEIAA Uttar Pradesh vide letter no. 191/Parya/SEIAA/5667/2019 dated 7th July 2020

F.No. IA-J-11014/1/2021-IA-1
Government of India
Ministry of Environment, Forest and Climate Change
(I.A. Division)

Indira Paryavaran Bhavan
Jor Bagh Road, Aliganj
New Delhi-110 003
E-mail: sharath.kr@gov.in
Dated: 05.01.2021

OFFICE MEMORANDUM

Sub: Implementation of Wildlife Conservation Plan - reg.

This has reference to the instances brought to the notice of the Ministry that several States are not implementing the Wildlife Conservation Plan as per the spirit and components approved by the Chief Wildlife Warden.

2. In this reference, all the Integrated Regional Offices of the Ministry are hereby requested to conduct a study on the implementation status of the Wildlife Conservation Plans including diversion of funds for unapproved activities and other irregularities pertaining to projects/ activities granted environmental clearance in their jurisdiction. The report on the matter shall be submitted by the end of February, 2021.

This issues with the approval of Competent Authority.


(Sharath Kumar Pallerla)


Director

To:

The Deputy Director General of Forests to all Integrated Regional Offices

Copy to,

1. PPS to JS(GM)


(Sharath Kumar Pallerla)

Director



भारत सरकार

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय

एकीकृत क्षेत्रीय कार्यालय, लखनऊ

Ministry of Environment, Forest & Climate Change
Integrated Regional Office, Lucknow



केंद्रीय भवन, पंचम तल, सेक्टर-एच, अलिगंज, लखनऊ-226024
Kendriya Bhawan, 5th Floor, Sector-H, Aliganj, Lucknow-226024, Telefax-2326696
Email: rocz.lko-mef@gov.in, goimcoefrollko@gmail.com

File No.: II/Env/MoEF/1/13/1986

Dated: 10.02.2021

To,

1. M/s Rampur Distillery,
(A unit of Radico Khaitan Ltd.)
Bareilly Road, Rampur - 244901, UP
rampur@radico.co.in, info@radico.co.in
2. President (Production)
M/s Radico Khaitan Ltd.
(Unit - Grain Spirit Plant),
Bareilly Road, Rampur-244901
Uttar Pradesh
rampur@radico.co.in, info@radico.co.in
3. Chief General Manager (LA)
National Highways Authority of India
G-5&6, Sector-10, Dwarka, New Delhi-110075
vksharma@nhai.org
4. The Chief Engineer (Eastern Ganga),
Irrigation Deptt., Tubewell Colony,
Civil Lines, Moradabad, Uttar Pradesh
ceecjclupmo-up@nic.in
5. M/s Gaursons India Ltd.,
305, Arunachal Building,
19, Barakhamba Road, Connaught Place,
New Delhi- 110001
devendrabhandari@hotmail.com
6. Asstt. G.M. (Distillery),
Dhampur Sugar Distillery Pvt. Ltd.,
Village- Asmoli, Tehsil- Sambhal, Distt. Moradabad,
U.P.- 244304
saket@mgcoca.com
7. Head Strategic Planning, HRD
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8. Project Director
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(U.P.)
Fax: 0581-2523757
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9. The Vice President,
M/s Tikaula Distillery
Distt. Muzaffarnagar,
Uttar Pradesh
tkaula@rediffmail.com
10. Associate Vice President (W),
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(A division of SVP Industries Ltd.),
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11. The General Manager,
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12. The Director,
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State Level Environment Impact Assessment Authority, Uttar Pradesh

Directorate of Environment, U.P.

Vineet Khand-1, Gomti Nagar, Lucknow - 226 010

Phone : 91-522-2300 541, Fax : 91-522-2300 543

E-mail : doeuplko@yahoo.com

Website : www.seiaaup.com

To,

Shri Abhishek Gupta,
Managing Director,
M/s Rati Pushp Intermediates Pvt.Ltd,
8th KM, Jansath Raod,
Muzaffarnagar U.P-251001

Ref. No. 191/Parya/SEIAA/5667/2019

Date: 07/7/2020
June, 2020

Sub: Environmental Clearance for Proposed Expansion of APIS and Bulk Drugs Manufacturing Unit from 28.70 TPA to 324 TPA at 8th km. Jansath road, District- Muzaffarnagar, U.P., M/s Rati Pushp Intermediates Pvt. Ltd.

Dear Sir,

Please refer to your application/letters 25-05-2020 & 08-06-2020 addressed to the Chairman/Secretary, State Level Environment Impact Assessment Authority (SEIAA) and Director, Directorate of Environment Govt. of UP on the subject as above. The State Level Expert Appraisal Committee considered the matter in its meetings held on dated 04-06-2020 and SEIAA in its meeting dated 18-06-2020.

A presentation was made by the project proponent through video/tele-conferencing/ email in view of the Corona Virus Disease (Covid-19) along with their consultant M/s EQMS India Pvt. Ltd. The proponent, through the documents submitted and the presentation made, informed the committee that:-

1. The environmental clearance is sought for Expansion of APIS and Bulk Drugs Manufacturing Unit from 28.70 TPA to 324 TPA at 8th km. Jansath road, District- Muzaffarnagar, U.P., M/s Rati Pushp Intermediates Pvt. Ltd.
2. Environmental Clearance for the existing proposal was issued by MOEF&CC, Govt. of India vide letter No. F.NO./J-11011/204/2010/IA-II(I) dated 22 July 2013.
3. The present manufacturing capacity and Products: 28.70 TPA, L-Base, D-Base, Chloramphenicol Powder and Chloramphenicol Palmitate.
4. MOEF&CC GOI has issued Office Memorandum Dated 13.04.2020 wherein proposals for projects or activities in respect of Active Pharmaceutical Ingredients (API), received up to the 30th September 2020, shall be appraised, as Category B2' projects for expediting the prior Environmental Clearances so as to ensure drug availability or production to reduce the impact of the Novel Corona Virus (COVID-19).
5. Salient Features of the project as submitted by the project proponent:

Sl. No.	Parameter	Description
1	Name of the project	Expansion of APIs and Bulk Drugs Manufacturing
2	Category of Project as per EIA Notification & Amendments	5(f) ' Manufacturing / Production of Synthetic Organic Chemicals , (API) Category "B2"
3	Plot/ Survey/ Khasra No.	8th km. Jansath Road Muzaffarnagar, U.P.
4	Project cost	4 Crores
5	Existing capacity/ area etc.	28.70 TPA
6	Proposed capacity	28.70 TPA to 324 TPA.
7	Land requirement	No additional land required. Expansion within existing plant Total Land available- 1805 m2 Area required for proposed expansion- 534 m2 Green belt area: (610 m2)



8	Water Requirement & Source	Existing: 2.02 KLD (ground water) Proposed: 3.1 KLD Total (after expansion): 5.12 KLD Source: From ground water.
9	Waste water generation	Existing: 0.52 KLD (Treated in ETP) Proposed : 1.1 KLD (to be treated in ETP) Total (after Expansion): 1.62 KLD Treatment : ETP (2 KLD), ZLD system .
10	Power/Fuel Requirement& Source	Existing: 63 KVA (being sourced from state electricity board) After expansion: Total power requirement will be 213 KVA Source: from state electricity board.
11	Emergency Power	2 D. G. Sets 30KVA & 63 KVA. -- Existing 1 D.G. Set 160KVA - Proposed
11	Fuel Requirement	Existing: approx 40 lit/day Diesel for 300 kg Boiler and approx 8 LPH Diesel for DG Proposed: approx 120 lit/day Diesel for 1000 kg Boiler and approx 18 LPH Diesel for DG
11	Man Power/ Employment	Direct employment : 18 person indirect employment: for 30 persons.
12	Solid and Hazardous Waste	Shall be disposed as per Norms

6. Area details:

S. No.	Land Use	Existing Area in sq. m.	**Proposed Area in sq. m.	%
1	Ground Coverage	467	320.00	63%
2	First Floor Coverage	Nil	214.00	100%
3	Green Area	610	Nil Nil	0%
4	Parking Area	41	Nil Nil	0%
5	Road & Open area	363	Nil Nil	0%
6	ETP TANK	26	Nil Nil	0%
7				
8				
	Total Plot area	1805	534.00	

7. Product details : Existing and Proposed:

Sr.No.	Products/By-Product Name	Existing (TPA)	Proposed (TPA)	Total (TPA)	CAS number:
1	L-Base	4.328	36.5	40.8	716-61-0
2	D-Base	12.48	NIL	12.48	2664-48-9
3	Chloramphenicol Powder	7.2	52.8	60	56-75-7
4	Chloramphenicol Palmitate	4.687	NIL	4.687	530-43-8
5	Glimepiride	-	4	4	93479-97-1
6	Glipizide	-	4	4	29094-61-9
7	Chlorphenamine Maleate	-	18	18	113-92-8
8	AmbroxolHcl	-	60	60	23828-92-4
9	Levofloxacin	-	60	60	100986-85-4
10	Ofloxacin	-	60	60	82419-36-1
Total		28.70	295.3	323.967	-

8. Water requirement details:

S. No	Activity	Existing Water Requirement	Proposed Water Required (KLD)	Total After Expansion (KLD)
1	Domestic	0.5	0.5	1
2	Process Water	0.32	0.6	0.92
3	Wash Water	0.2	0.5	0.7



4	Scrubbing	Nil	Nil	Nil
5	Cooling Tower &Boiller	0.5	1.5	2
7	Gardening	0.5	0.5	1
	Total	2.02	3.6	5.62

9. Liquid waste generation details:

Type of Effluent	Existing	Proposed	Total	Treatment method
Plant Processes / Manufacturing	0.32	0.6	0.92	ETP (1 KLD Existing and 1 KLD Proposed)
Washing of Pant Machinery and others	0.2	0.5	0.7	
Total	0.52	1.1	1.62	
Domestic	0.5	0.5	1.0	Disposed in Septic Tank Soak Pit

- Total effluent generated from the unit (after expansion) will be 1.62 KLD and propose treat in-house zero liquid discharge system.
- Treated effluent is proposed to be use for utility operations, floor washing and toilet flushing's.
- Domestic waste shall be disposed in soak pit and septic tank.

10. The wastewater generated (1.62 KLD) will be treated in an on-site ETP (2 KLD capacity).

11. Solid waste generation details:

Type of waste	Details of the waste	Generation	Management
Municipal solid waste	Bio Degradable and non Bio Degradable	18 Kg/day	Authorized Recycler and Municipal Land fill site
Process waste Non Hazardous	Waste Papers And Plastic Products such as Bags etc.	0.3 MTA	Sale to Recyclers
	Battery Waste	0.15 MTA	Return to battery manufacturer through authorized dealer on buy back procurement program
	E-Waste	0.1 MTA	Sale to Recyclers
Hazardous waste	ETP Sludge	1.0 MTA	Will be collected in HDPE bags and stored and Will be disposed off to TSDF site
	Spent Carbon	0.08 MTA	

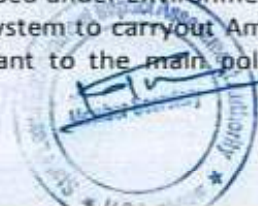
12. The project proposal falls under category-5(f) of EIA Notification, 2006 (as amended).

Based on the recommendations of the State Level Expert Appraisal Committee Meeting (SEAC) held on 04-06-2020 the State Level Environment Impact Assessment Authority (SEIAA) in its Meeting held 18-06-2020 and decided to grant the Environmental Clearance for proposed project along with subject to the effective implementation of the following conditions:-

1. Project proponent should submit the certified compliance report within 03 months with effective date of issuance of Environment Clearance letter. In case the project proponent fails to submit the same the EC shall automatically deemed to be cancelled.
2. In compliance to Hon'ble Supreme Court order dated 13/01/2020 in IA no. 158128/2019 and 158129/2019 in Writ petition no. 13029/1985 (MC Mehta Vs GOI and others) anti smog guns shall be installed to reduce dust during excavation.
3. Directions/suggestions given during public hearing and commitment made by the project proponent should be strictly complied.
4. Since the proposed project falls in Critically Polluted Areas (CPAs), Severely Polluted Areas (SPAs) the provision of the mechanism formed regarding compliance of Hon'ble NGT order in OA 1038/2018 dated 19-08-2019 by MoEF& CC, Govt. Of India vide letter dated 31-10-2019 shall be followed in letter and spirit.
5. All the additional condition for grant of Consent to Establish (CTE)/Consent to Operate (CTO) related to Pollution mitigation measures as prescribed in the office memorandum of MoEF&CC, Gol. dated 31.10.2019 and as deemed fit by UP Pollution Control Board in the consent orders shall be followed by Project Proponent.



6. The project proponent shall submit within the next 3 months the details of solar power plant and solar electrification details within the project.
7. The project proponent shall ensure to plant broad leave trees and their maintenance. The CPCB guidelines in this regard shall be followed.
8. The project proponent shall submit within the next 3 months the details on quantification of year wise CER activities along with cost and other details. CER activities must not be less 2% of the project cost. The CER activities should be related to mitigation of Environmental Pollution and awareness for the same.
9. The project proponent shall install micro solar power plants, toilets in nearby villages, public place or school from CER fund of the project for which E.C is granted in addition to and water harvesting pits and carbon sequestration parks / designed ecosystems.
10. The project proponent shall obtain the forest clearance and permission of Central and State Government as per law under the provisions of Forest (conservation) Act, 1980 before the start of work.
11. ZLD shall be ensured, in any circumstances effluent of any type shall not be discharged and find its way outside the factory premises. STP of adequate capacity shall be installed for the treatment of the domestic domestic waste water.
12. SEIAA opined that the project proponent shall submit permission of CGWA or proposal for alternative source of fresh water.
13. Certified compliance report for the earlier environmental clearance should be submitted within 03 months. In case of failure, the environmental clearance shall automatically deemed to be cancelled.
14. Zero liquid discharge should be practiced.
15. **Statutory compliance:**
 - i. The project proponent should obtain necessary permission from Drug Controller, Govt. of India, within time frame.
 - ii. The project proponent shall obtain forest clearance under the provisions of Forest (Conservation) Act, 1986, in case of the diversion of forest land for non-forest purpose involved in the project.
 - iii. The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.
 - iv. 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 the six-monthly compliance report. (in case of the presence of schedule species in the study area).
 - v. The project proponent shall obtain Consent to Establish/Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State Pollution Control Board/ Committee.
 - vi. The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.
 - vii. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.
16. **Air quality monitoring and preservation:**
 - i. The project proponent shall install 24x7 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 recognised under Environment (Protection) Act, 1986 or NABL accredited laboratories.
 - ii. The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognised under Environment (Protection) Act, 1986.
 - iii. 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



PM_{2.5} in reference to PM emission, and SO₂ and NO_x in reference to SO₂ and NO_x emissions) within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120° each), covering upwind and downwind directions.

- iv. 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 emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- v. Storage of raw materials, coal etc, shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- vi. 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.
- vii. The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be complied.

17. Water quality monitoring and preservation:

- i. The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises (applicable in case of the projects achieving ZLD)
- ii. 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 projects achieving the ZLD).
- iii. The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the State Pollution Control Board while granting Consent under the Air/Water Act, whichever, is more stringent.
- iv. 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.
- v. Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
- vi. The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.
- vii. 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 this regard.

18. Noise monitoring and prevention:

- i. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- ii. 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.
- iii. 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.

19. Energy Conservation measures:

- i. The energy sources for lighting purposes shall preferably be LED based.

20. Waste management:

- i. 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.



- ii. 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.
- iii. The company shall undertake waste minimization measures as below:-
 - a. Metering and control of quantities of active ingredients to minimize waste.
 - b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
 - c. Use of automated filling to minimize spillage.
 - d. Use of Close Feed system into batch reactors.
 - e. Venting equipment through vapour recovery system.
 - f. Use of high pressure hoses for equipment clearing to reduce wastewater generation

21. Green Belt:

- i. 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.

22. Safety, Public hearing and Human health issues:

- i. Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- ii. The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- iii. The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
- iv. 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.
- v. 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.
- vi. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- vii. 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.

23. Corporate Environment Responsibility:

- i. The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No. 22-65/2017-IA.III dated 1st May 2018, as applicable, regarding Corporate Environment Responsibility.
- ii. The company shall have a well laid down environmental policy duly approved 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.
- iii. 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.
- iv. 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.

- v. Self environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

24. Miscellaneous:

- i. Environment Clearance subjected to condition of necessary permission from Drug Controller and Department of Industry.
- ii. Monitoring of dioxin and furon from biomass fueled boiler should be done.
- iii. Agreement with TSDF vendors shall be submitted.
- iv. 100% waste water is to be treated in ETP conforming to prescribed standards of receiving body for designated use.
- v. 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.
- vi. 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 display the same for 30 days from the date of receipt.
- vii. 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.
- viii. The project proponent shall monitor the criteria pollutants level namely; PM₁₀, SO₂, 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.
- ix. 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.
- x. 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.
- xi. 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.
- xii. The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.
- xiii. 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.
- xiv. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).
- xv. 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.
- xvi. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.
- xvii. The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.
- xviii. The Regional Office of this Ministry 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.
- xix. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary



Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.

- xx. 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.

Concealing factual data and information or submission of false/fabricated data and failure to comply with any of the conditions stipulated in the Prior Environmental Clearance attract action under the provision of Environmental (Protection) Act, 1986.

This Environmental Clearance is subject to ownership of the site by the project proponents in confirmation with approved Master Plan for Muzaffarnagar. In case of violation; it would not be effective and would automatically be stand cancelled.

The project proponent has to ensure that the proposed site is not a part of any no- development zone as required/prescribed/identified under law. In case of the violation this permission shall automatically deemed to be cancelled. Also, in the event of any dispute on ownership or land use of the proposed site, this Clearance shall automatically deemed to be cancelled.

Further project proponent has to submit the regular 6 monthly compliance report regarding general & specific conditions as specified in the E.C. letter and comply the provision of EIA notification 2006 (as Amended).

These stipulations would be enforced among others under the provisions of Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification, 2006 including the amendments and rules made thereafter.



(Ashish Tiwari)
Member Secretary, SEIAA

No...../Parya/SEAC/5667/2019 Dated: As above

Copy with enclosure for Information and necessary action to:

1. The Principal Secretary, Department of Environment, Govt. of Uttar Pradesh, Lucknow.
2. Advisor, IA Division, Ministry of Environment, Forests & Climate Change, Govt. of India, Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj, New Delhi.
3. Additional Director, Regional Office, Ministry of Environment & Forests, (Central Region), Kendriya Bhawan, 5th Floor, Sector-H, Aliganj, Lucknow.
4. District Magistrate Muzaffarnagar.
5. The Member Secretary, U.P. Pollution Control Board, TC-12V, Paryavaran Bhawan, Vibhuti Khand, Gomti Nagar, Lucknow.
6. Copy to Web Master/ guard file.

(Ashish Tiwari)
Member Secretary, SEIAA

EXHIBIT-XII



Uttar Pradesh Pollution Control Board

Building. No TC-12V Vibhuti Khand, Gomti Nagar, Lucknow-226010

Phone:0522-2720828,2720831, Fax:0522-2720764, Email: info@uppcb.in, Website: www.uppcb.com

169406/UPPCB/MuzaffarNagar(UPPCBRO)/CTO/both/MUZAFFARNAG
AR/2022

Date: 27/12/2022

To,

M/s

RATI PUSHUP INTERMEDIATES PVT LTD

8TH KM STONE, jansath road

Application Id-
18544031

Consolidated Consent to Operate and Authorisation hereinafter referred to as the CCA (Consolidated Consent & authorization) (Fresh) under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981

CCA is hereby granted to **RATI PUSHUP INTERMEDIATES PVT LTD** located at **8TH KM STONE, jansath road**. subject to the provisions of the **Water Act, Air Act** and the orders that may be made further and subject to following terms and conditions :-

1. This CCA **RATI PUSHUP INTERMEDIATES PVT LTD** granted for the period from **27/12/2022 to 31/12/2027** and valid for manufacturing of following products.

S No	Product	Quantity	Unit
1	L-BASE-40.8 MT/ANNUM	40.8	Metric Tonnes/Year
2	D-BASE-12.48 MT/ANNUM	12.48	Metric Tonnes/Year
3	CHLORAMPHENIC OL POWDER-60 MT/ANNUM	60	Metric Tonnes/Year
4	CHLORAMPHENIC OL PALMITATE-4.6 MT/ANNUM	4.6	Metric Tonnes/Year
5	GLIMEPIRIDE-4 MT/ANNUM	4	Metric Tonnes/Year
6	GLIPIZIDE-4 MT/ANNUM	4	Metric Tonnes/Year
7	CHLORPHENERAM INE MALEATE-18 MT/ANNUM	18	Metric Tonnes/Year
8	AMBROXOL HCL- 60 MT/ANNUM	60	Metric Tonnes/Year
9	LEVOFLOXACIN- 60 MT/ANNUM	60	Metric Tonnes/Year
10	OFLOXACIN-60 MT/ANNUM	60	Metric Tonnes/Year

2. Conditions under Water(Prevention and Control of Pollution) Act -1974 as amended :-

(i) The daily quantity of effluent discharge (KLD) :-

Kind of Effluent	Quantity(KLD)	Treatment facility	Discharge point
Domestic	0.7 KLD	Septic Tank	SEPTIC TANK
Industrial	ZLD	ETP	ZLD

(ii) Trade Effluent Treatment and Disposal :-The applicant shall operate Effluent Treatment Plant consisting of primary/secondary and tertiary treatment as is required with reference to influent quantity and quality.

In case of stoppage of functioning of ETP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(iii) The treated effluent shall be recycled to the maximum extent and should be reused within the premises for gardening etc. Quality of the treated effluent shall meet to the following general and specific standards as prescribed under Environment (Protection) Rules, 1986 and applicable to the unit from time-to-time :-

Industrial Effluent Quality Standard

S.No.	Parameter	Standard
1	COD	AS PER E(P) RULES, 1986
2	BOD	AS PER E(P) RULES, 1986
3	pH	AS PER E(P) RULES, 1986
4	OIL AND GREASE	AS PER E(P) RULES, 1986
5	TOTAL SUSPENDED SOLIDS	AS PER E(P) RULES, 1986

(iv) Sewage Treatment and Disposal :- The applicant shall provide comprehensive STP as is required with reference to influent quantity and quality. In case of stoppage of functioning of STP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(v) The treated sewage shall be reused in gardening as far as possible. The STP shall be maintained continuously so as to achieve the quality of the treated sewage to the following standards.

S No.	Parameters	Standards
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3. Conditions under Air (Prevention and Control of Pollution) Act -1981 as amended :-

i) The applicant shall use following fuel and install a comprehensive control system consisting of control equipment as required with reference to generation of emissions and operate and maintain the same continuously so as to achieve the level of pollutants to the following standards.

Air Pollution Source Details

S No.	Air Pollution Source	Type of fuel	Stack no	Control Device	Height of Stack
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1	1 X 250 KG/HR BABY BOILER	LSHS-0.07 KLD (ONLY APPROVED FUEL BE PERMITTED AS PER CAQMDIRECTION)	01	Particulate Matter	12 METER STACK HEIGHT FROM GROUND LEVEL
2	1 X 750 KG/HR BABY BOILER	BIOMASS BRIQUETTES- 0.80 MTD (ONLY APPROVED FUEL BE PERMITTED AS PER CAQMDIRECTION)	01	Particulate Matter	22 METER STACK HEIGHT FROM GROUND LEVEL
3	1 X 63 KVA DG SET	DIESEL	01	Particulate Matter	AS PER E(P) RULES, 1986
4	1 X 250 KVA DG SET	DIESEL	01	Particulate Matter	AS PER E(P) RULES, 1986

Emmission Quality Standards

S No.	Stack no	Parameters	Standards
1	01	Particulate Matter	AS PER E(P) RULES, 1986
2	01	Particulate Matter	AS PER E(P) RULES, 1986
3	01	Sulphur Dioxide	AS PER E(P) RULES, 1986
4	01	Sulphur Dioxide	AS PER E(P) RULES, 1986

In case of stoppage of functioning of air pollution control equipment, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately

(ii) The unit will not use any type of restricted fuel.

iii) Noise from the D.G. Set and other source(s) should be controlled by providing an acoustic enclosure as is required for meeting the ambient noise standards for night and day time as prescribed for respective areas/zones (Industrial, Commercial, Residential, Silence) which are as follows :-

Day time : from 6.00 a.m. to 10.00 p.m., Night time: from 10.00 p.m. to 6.00 a.m.

Standards for Noise level in db(A) Leq	Industrial Area		Commercial Area		Residential Area		Silence Zone	
	Day Time	Night Time	Day Time	Night Time	Day Time	Night Time	Day Time	Night Time
	75	70	65	55	55	45	50	40

4. Essential documents to be submitted by the Industry/Unit as Applicable :-

(i) Environment Statement in Form-V of Environment (Protection) Rules, 1986.

(ii) Quarterly compliance report of the CCA, photograph of ETP/APCs/Waste Storage Area.

5. Competent Authority reserves the right to change/modify/add any time any condition of this CCA.

6. Unit has to comply with the following specific & general conditions. Non compliance of any provision of this CCA and provisions of the Water Act, Air Act and Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 will result in legal action under the aforesaid Acts and Rules.

7. In compliance to the G.O 1011/81-7-2021-09 (Writ)/2016 dated.13.10.2021 issued by Department of Environment, Forest and Climate Change, Uttar Pradesh. You are directed to develop Miyawaki Forest as per the SOP available at URL:-<http://www.upecp.in/TrainingSession.aspx> for ensuring timely compliance of this direction, you are hereby directed to submit a bank guarantee with minimum validity of one year of the amount equivalent to the sum of initial consent fees (Air and Water) or Rs. 50,000/- (Rs. Fifty Thousand Only) whichever is more, within 30 days from the date of issuance of this certificate. In case of non-compliance of this direction, your consent will be revoked by the Board.

8. If the unit uses the ground water and requires the permission from SGWA/CGWA for water abstraction then the industry will have to obtain No objection certificate for abstraction of ground water. It will be the responsibility of the industry to comply with the various conditions of the NOC obtained from the competent authority and submit to the Board, within 3 months time failing which CTO will be revoked.

General Conditions:-

1. The applicant shall get analysed the samples of effluent/emission/hazardous wastes at least once in a three month from the laboratory recognized by the MoEF and shall report to the UPPCB.

2. The applicant shall however, not without the prior consent of the Board bring into use any new or altered outlet for the discharge of effluent or gases emission or sewage waste from the unit.

3. Treated Industrial waste water and domestic waste water shall be disposed jointly at one disposal point. The applicant shall provide discharge measurement equipment at final disposal point.

4. The applicant shall strictly comply with conditions of this CCA and submit compliance report of stipulated conditions within 30 days of receipt of this CCA. If at any point of time, it is found that the industry is not complying with stipulated conditions or any further direction/instruction issued by the Board, legal action shall be initiated against the applicant.

5. The applicant shall maintain good house keeping. All valves/pipes/sewer/drains etc. must be leak-proof

6. The industry shall provide uninterrupted entry to the STP/ETP inlet and outlet points, Air Pollution Control equipment and stack for smooth sampling/monitoring of efficiency of pollution control systems.

7. The industry shall provide Inspection Book at the time of inspection to the Board's officials.

8. Whenever due to any accident or other unforeseen act or event, such emission occurs or is apprehended to occur in excess of standards laid down, such information shall be reported to the Board's offices and all other concerned offices. In case of failure of pollution control equipment, the production process connected to it shall be stopped with immediate effect.

9. The industry shall operate in a manner so that all emissions be emitted through designated chimney/stack only.

10. In case of any damage to the agriculture productivity, human habitation etc. by the operation of industry, it shall be imperative to stop production in the industry with immediate effect and such information shall be reported to Board's offices. The industry shall be liable to pay compensation also in such cases as decided by the Competent Authority.

11. The applicant shall apply before the 60 days of expiry of CCA or any change in production types/production capacity/manufacturing process/capacity enhancement etc. or any change in effluent discharge point or emission point

12. The Board reserves the right to revoke/add/modify any stipulated condition issued along with CCA, as may be necessary.

Specific Conditions:-

1. This CTO is valid only for the production capacity of L-BASE-40.8 MT/ANNUM, D-BASE-12.48 MT/ANNUM, CHLORAMPHENICOL POWDER-60 MT/ANNUM, CHLORAMPHENICOL PALMITATE-4.6 MT/ANNUM, GLIMEPIRIDE-4 MT/ANNUM, GLIPIZIDE-4 MT/ANNUM, CHLORPHENERAMINE MALEATE-18 MT/ANNUM, AMBROXOL HCL-60 MT/ANNUM, LEVOFLOXACIN-60 MT/ANNUM, OFLOXACIN-60 MT/ANNUM BY USING S-BASE 52.8 MT/ANNUM, HYDROCHLORIC ACID (HCL) 61.3 MT/ANNUM, SODIUM HYDROXIDE (NAOH) METRIC 7.3 MT/ANNUM, L-BASE 35.9 MT/ANNUM, METHYL DICHLORO ACETATE 25.9 MT/ANNUM, METHANOL 242.4 MT/ANNUM, PALMITOYL CHLORIDE 2.95 MT/ANNUM, ACETONE 160 MT/ANNUM, PYRIDINE 1.2 MT/ANNUM, ISO PROPYL ALCOHOL 30 MT/ANNUM, GLIMEPRIDE SULPHONAMIDE 4 MT/ANNUM, 4-TRANS-METHYL CYCLOHEXILISOCYANATE 2.4 MT/ANNUM, ANHYDROUS POTASSIUM CARBONATE 5 MT/ANNUM, LIQUID AMMONIA 6 MT/ANNUM, ACTIVATED CARBON 0.06 MT/ANNUM, GLIPIZIDE SULPHONAMIDE 4 MT/ANNUM, CYCLOHEXYLISOCYANATE 2 MT/ANNUM, DENATURED SPIRIT 15 MT/ANNUM, METHYLENE DI CHLORIDE 20 MT/ANNUM, TOULENE 108 MT/ANNUM, CAUSTIC POTASH FLAKES 2.7 MT/ANNUM, CYNOBASE 14 MT/ANNUM, MALEIC ACID 4 MT/ANNUM, 2-AMINO-3,5- DIBROMOBENZALDEHYDE 45 MT/ANNUM, TRANS AMINOCYCLOHEXANOL 20 MT/ANNUM, SODIUM BOROHYDRIDE 13.5 MT/ANNUM, Q-ACID 50 MT/ANNUM, N-METHYL PIPERIZINE 90 MT/ANNUM, DIMETHYL SULPHOXIDE 25 MT/ANNUM, O-Q ACID 50 MT/ANNUM AS MAIN RAW MATERIAL at site 8TH K.M. STONE, JANSATH ROAD MUZAFFARNAGAR.
2. Earlier Board has issued a CTO vide Ref No. - 43057/UPPCB/MuzaffarNagar(UPPCBRO)/CTO/water/MUZAFFARNAGAR/2018, Dated: 30/12/2018 and Ref No. - 43052/UPPCB/MuzaffarNagar(UPPCBRO)/CTO/air/MUZAFFARNAGAR/2018, Dated: 30/12/2018 is revoked.
3. The industry must comply the conditions of NOC obtained from the UPGWD for abstraction of ground water.
4. The industry must comply the conditions of Environmental Clearance obtained from SEIAA, UP on 07.07.2020 for environmental clearance.
5. In case of any change in production capacity/ process/raw materials use etc. the industry will have to intimate the Board. For any enhancement of the above, fresh Consent to Establish has to be obtained from U.P. Pollution Control Board.
6. The APCS will be maintained and operated in such a manner that emissions always conform to the standard laid down under the E.P. Act, 1986 as amended.
7. Industry shall submit stack/ambient air quality monitoring report from MOEF&CC or UPPCB within one month to the Board and on quarterly basis.
8. Industry shall submit analysis report from MOEF&CC or UPPCB approved lab within a month to the Board and on quarterly basis.
9. This CTO is valid only for ZLD. No effluent shall be discharge outside the factory premises.
10. As per the directions given by Commission for Air Quality Management in National Capital Region and Adjoining Areas vide its letter no-A-110018/01/2021-CAQM, dated-04.02.2022, industry shall under all circumstances completely switch over to PNG or Bio Fuels latest by 30.09.2022. Unit must use as per direction given by CAQM.
11. Unit shall comply with direction issued under Graded Response Action Plan (GRAP) time to time by Hon'ble Supreme Court & Commission for Air Quality Management in NCR and Adjoining Areas (CAQM).
12. Operation and maintenance of APCS shall be done in such a way that the emission generated from stacks is always within prescribed norms of the Board.

13. Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 53 and 62 and other direction issued time to time regarding use of cleaner fuel.

14. Unit shall comply with the CAQM (Commission for Air Quality Management in NCR and Adjoining Areas) direction no. 55, 62 & 68 regarding DG sets.

15. The unit shall be monitored all sources of emissions from Boiler/Thermopack etc. after fuel conversion from Regional Laboratories, UPPCB on payment basis within a month. To ensure emissions parameters as per CAQM order.

16. DG sets under 800 KW have been fitted with Dual fuel system (70 % Gas + 30 % Diesel). For Capacity of DG Sets (>298 kW to <800 kW)' where authorised/certified agencies for RECDs are still not available provision of dual fuel system (70 % Gas + 30 % Diesel) in such DG Sets shall be considered as part compliance of the Directions No 54 to 57 dated 08.02.2022 and use of DG Sets shall be permitted for maximum 01 hour per day till September 30, 2023, in areas where gas infrastructure is available' as one-time as per CAQM direction dated-16.12.2022.

17. The industry shall comply the provisions of Hazardous and Other Waste (Management and Transboundary Movement) Rules, 2016 and shall obtain authorization for the disposal of hazardous waste.

18. This Consent to Operate (CTO) order shall automatically become invalid on issuance of Closure Order by C.P.C.B / UPPCB and further on Revoking of Closure order, the Consent order shall become valid.

19. The industry shall comply with various provisions of Air (Prevention and Control of Pollution) Act 1981 as amended, Water (Prevention and Control of Pollution) Act 1974 as amended and all other applicable rules notified under E.P. Act 1986 and the various orders issued by the MOEF&CC, CPCB and SPCB in time to time.

20. The industry shall provide adequate arrangement for fighting the accidental leakages/discharge of any air pollutant/gas/liquid from the vessel, machinery etc. which are likely to cause fire hazard including environmental pollution.

21. The industry shall install electromagnetic flow meter at water source and outlet of ETP, and maintain the records of water abstracted and recycled treated effluent. The treated effluent from the Effluent Treatment Plant shall be used completely in the manufacturing process.

22. Industry shall install at sufficient height from the ground level Open to Network HD PTZ Camera at the outlet of the discharge drain of effluent from the factory premises and its URL and password shall be provided to the UPPCB Control room.

23. Industry shall comply with various Waste Management Rules as notified by MoEF &CC i.e. Plastic Waste Management Rules, 2016, Solid Waste Management Rules, 2016, Hazardous and Other Wastes (Management and Transboundary) Rules, 2016, E-waste (Management) Rules, 2016, Construction and Demolition Waste Management Rules, 2016, Battery Rules 2000 and Noise Pollution (Regulation and Control) Rule, 2000.

24. Industry shall install and maintain Online Continuous Effluent and emission Monitoring System

(OCEMS) on ETP and stack & connect it with SPCBs and CPCB server, before start of production as per the direction of CPCB.

25. Industry shall comply the order passed by Hon'ble NGT time to time.

26. The industry shall ensure provisions of Roof Top Rain Water Harvesting system and Ground Water Recharging Proposal/ compliance report should be sent to the Board within One month.

27. Industry shall dispose the hazardous waste through authorized recyclers/TSDF.

28. Industry shall not use furnace oil/pet coke as a fuel.

29. The industry should be operated in such a manner that it does not adversely affect the environment and the solid waste generated such as ash etc. be disposed in eco friendly manner.

30. The industry shall abide by orders / directions issued by Hon'ble Supreme Court Hon'ble High Court, Hon'ble National Green Tribunal, Central Pollution Control Board and U.P Pollution Control Board for protection and safe guard of environment from time to time.

31. The industry shall obtain prior consents in the event of any addition of new emission generation sources such as- Boiler/ Furnace/ Heaters/ D.G. Sets or alteration of existing emission sources in accordance with section- 21/22 of air Act 1981 (as amended respectively).

32. Minimum 33% of the land on which industry is established will be covered by the plantation of tall trees of suitable species as per the guidelines set up by the Board vide its Office Order no.H16405/220/2018/02 dt. 16/02/2018. The copy of this guideline is available at URL http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf.

PRADEEP SHARMA Digitally signed by
PRADEEP SHARMA
Date: 2022.12.28
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Chief Environmental Officer (Circle 3)

Copy to:

Regional Officer, U.P. Pollution Control Board, MuzaffarNagar to ensure the compliance of the conditions imposed in the certificate.

PRADEEP SHARMA Digitally signed by
PRADEEP SHARMA
Date: 2022.12.28
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Chief Environmental Officer (Circle 3)



UTTAR PRADESH POLLUTION CONTROL BOARD

Building. No TC-12V Vibhuti Khand, Gomti Nagar, Lucknow-226010

Phone:0522-2720828,2720831, Fax:0522-2720764, Email: info@uppcb.com, Website: www.uppcb.com

Validity Period :13/06/2021 To 12/06/2026

**Ref No. -
121881/UPPCB/MuzaffarNagar(UPPCBRO)/CTE/MUZAFFARNAG
AR/2021**

Dated:- 18/06/2021

To ,

Shri ABHISHEK GUPTA
M/s RATI PUSHP INTERMEDIATES PVT LTD
8TH KM STONE, jansath road
MUZAFFARNAGAR

Sub : Consent to Establish for New Unit/Expansion/Diversification under the provisions of Water (Prevention and control of pollution) Act, 1974 as amended and Air (Prevention and control of Pollution) Act, 1981 as amended.

Please refer to your Application Form No.- 11430622 dated - 03/03/2021. After examining the application with respect to pollution angle, Consent to Establish (CTE) is granted subject to the compliance of following conditions :

1. Consent to Establish is being issued for following specific details :
A- Site along with geo-coordinates :
B- Main Raw Material :

Main Raw Material Details		
Name of Raw Material	Raw Material Unit Name	Raw Material Quantity
S-Base	Metric Tonnes/Year	52.8
Hydrochloric Acid (HCL)	Metric Tonnes/Year	61.3
Sodium Hydroxide (NaOH)	Metric Tonnes/Year	7.3
L-Base	Metric Tonnes/Year	35.9
Methyl dichloro acetate	Metric Tonnes/Year	25.9
Methanol	Metric Tonnes/Year	242.4
Palmitoyl Chloride	Metric Tonnes/Year	2.95
Acetone	Metric Tonnes/Year	160
Pyridine	Metric Tonnes/Year	1.2
Iso Propyl Alcohol	Metric Tonnes/Year	30
Glimepride Sulphonamide	Metric Tonnes/Year	4
4-trans-methyl cyclohexilisocyanate	Metric Tonnes/Year	2.4
Anhydrous Potassium Carbonate	Metric Tonnes/Year	5
Liquid Ammonia	Metric Tonnes/Year	6
Activated Carbon	Metric Tonnes/Year	0.06
Glipizide Sulphonamide	Metric Tonnes/Year	4
Cyclohexylisocyanate	Metric Tonnes/Year	2
Denatured Spirit	Metric Tonnes/Year	15
Methylene di chloride	Metric Tonnes/Year	20
Toulene	Metric Tonnes/Year	108
Caustic Potash Flakes	Metric Tonnes/Year	2.7
Cynobase	Metric Tonnes/Year	14
Maleic Acid	Metric Tonnes/Year	4
2-amino-3,5-dibromobenzaldehyde	Metric Tonnes/Year	45
Trans aminocyclohexanol	Metric Tonnes/Year	20
Sodium Borohydride	Metric Tonnes/Year	13.5
Q-acid	Metric Tonnes/Year	50
N-Methyl Piperizine	Metric Tonnes/Year	90
Dimethyl Sulphoxide	Metric Tonnes/Year	25
O-Q Acid	Metric Tonnes/Year	50

C- Product with capacity :

Product Detail	
Name of Product	Product Quantity
L-Base (MTA)	40.8
D-Base (MTA)	12.48
Chloramphenicol Powder (MTA)	60
Chloramphenicol Palmitate (MTA)	4.6
Glimepiride (MTA)	4
Glipizide (MTA)	4
Chlorpheneramine Maleate (MTA)	18
Ambroxol HcL (MTA)	60
Levofloxacin (MTA)	60
Ofloxacin (MTA)	60

D- By-Product if any with capacity :

By Product Detail			
Name of By Product	Unit Name	Licence Product Capacity	Install Product Capacity
-	Metric Tonnes/Day	0	0

2. Water Requirement (in KLD) and its Source :

Source of Water Details		
Source Type	Name of Source	Quantity (KL/D)
Ground Water (within premises)	Submersible pump	6.0

3. Quantity of effluent (In KLD) :

Effluent Details	
Source Consumption	Quantity (KL/D)
Domestic	1.0
Process	1.0
Boiler	1.0
Cooling	1.0
Others(Washing)	1.0
Others(Plantation)	1.0

4. Fuel used in the equipment/machinery Name and Quantity (per day) :

Fuel Consumption Details		
Fuel	Consumption(tpd/kld)	Use
Diesel	0.5	DG Sets & Boilers

5. For any change in above mentioned parameters, it will be mandatory to obtain Consent to Establish again. No further expansion or modification in the plant shall be carried out without prior approval of U.P. Pollution Control Board.

For any change in above mentioned parameters, it will be mandatory to obtain Consent to Establish again. No further expansion or modification in the plant shall be carried out without prior approval of U.P. Pollution Control Board.

2. You are directed to furnish the progress of Establishment of plant and machinery, green belt, Effluent Treatment Plant and Air pollution control devices, by 10th day of completion of subsequent quarter in the Board.
3. Copy of the work order/purchase order, regarding instruction and supply of proposed Effluent Treatment Plant/Sewerage Treatment Plant /Air Pollution control System shall be submitted by the industry till 12/06/2026 to the Board.
4. Industry will not start its operation, unless CTO is obtained under water (Prevention and control of Pollution) Act, 1974 and Air (Prevention and control of Pollution)Act, 1981 from the Board.
5. It is mandatory to submit Air and Water consent Application,complete in all respect, four months before start of operation, to the U.P. Pollution Control Board.
6. Legal action under water (Prevention and control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act,1981 may be initiated against the industry With out any prior information,in case of non compliance of above conditions.

Specific Conditions:

1. This consent to establish is issued for the expansion production capacity of product and production capacity of L-Base-40.8 MT/Annum, D-Base-12.48 MT/Annum, Chloramphenicol Powder-60 MT/Annum, Chloramphenicol Palmitate-4.6 MT/Annum, Glimepiride-4 MT/Annum, Glipizide-4 MT/Annum, Chlorpheneramine Maleate-18 MT/Annum, Ambroxol HcL-60 MT/Annum, Levofloxacin-60 MT/Annum, Ofloxacin-60 MT/Annum. In case of any change in production capacity, process, raw materials use etc. the industry will have to intimate the Board. For any enhancement of the above, fresh Consent to Establish has to be obtained from U.P. Pollution Control Board.

2. Industry shall comply the provisions of EP Act, 1986, Water (Prevention and Control of Pollution) Act, 1974 as amended, Air (Prevention and Control of Pollution) Act, 1981 as amended.

3. Industry shall dispose the hazardous waste through authorized recyclers/TSDF.

4. The 250 TPH boiler, 63 KVA DG set and 32 KVA DG set already installed by the industry should be operated properly, so that the operator board remains in compliance with the standards.

5. Industry shall install 1TPH Boiler with Multi Cyclone Dust Collector and 12 meter stack.

6. Industry shall install 160 KVA DG Set with acoustic enclosure and proper stack height.

7. Industry shall install ETP with Collection Tank, Process Tank, Centrifuge, Solar Evaporation Tank, Sludge Drying.

8. Industry shall comply the order passed by Hon'ble NGT time to time.

9. The APCS will be maintained and operated in such a manner that emissions always conform to the standard laid down under the E.P Act 1986 as amended.

10. The industry shall ensure provisions of Roof Top Rain Water Harvesting system and Ground Water Recharging Proposal/compliance report should be sent to the Board within One month.

11. Industry shall not use furnace oil/pet coke as a fuel.

12. Minimum 33% of the land on which industry is established will be covered by the plantation of tall trees of suitable species as per the guidelines set up by the Board vide its Office Order no.H16405/220/2018/02 dt. 16/02/2018. The copy of this guideline is available at URL http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf.

13. Industry shall not start production without prior consent of the board.

14. Industry shall not use more than 6 KLD water for all purpus in the industry.

15. Industry shall submit a bank guarantee of Rs. 1,60,000/- (Rs. One Lakh Sixty Thousand only) within 15 days for complying above condition no 1 to 15.

Please note that consent to Establish will be revoked, in case of, non compliance of any of the above mentioned conditions. Board reserves its right for amendment or cancellation of any of the conditions specified above. Industry is directed to submit its first compliance report regarding above mentioned specific and general conditions till 18/07/2021 in this office. Ensure to submit the regular compliance report otherwise this Consent to Establish will be revoked.

Nishi Kumar
Chauhan

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Chauhan
Date: 2021.06.18 16:43:47 +05'30'

CEO
C-3.

Dated:- 18/06/2021

Copy To -

Regional Officer, U.P. Pollution Control Board, Muzaffarnagar.

Nishi Kumar Chauhan

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Chauhan
Date: 2021.06.18 16:43:58 +05'30'

CEO
C-3.

EXHIBIT-XIII



उत्तर प्रदेश UTTAR PRADESH

FM 440166

AGREEMENT

THIS AGREEMENT made on this 18th day of August, 2020 between M/s RATI PUSHUP INTERMEDIATES Pvt. Ltd., 8th KM. JANSATH ROAD, MUZAFFARNAGAR, U.P.-251001, INDIA a Company incorporated under Companies Act 2015/ Partnership Act/ Proprietorship, having its registered Office located at 8th KM. JANSATH ROAD, MUZAFFARNAGAR, U.P.-251001, INDIA. and its Plant located at 8th KM. JANSATH ROAD, MUZAFFARNAGAR, U.P.-251001, INDIA (hereinafter called as "FIRST PART" which expression shall, unless repugnant to the context or meaning thereof, be deemed to mean and include its successors nominees and assigns of the First Part.

AND

M/s Bharat Oil and Waste Management Ltd (BOWML), a Company registered under the Companies Act 2015, having its registered office and corporate head office at 11, LGF, Community Center, East Of Kailash, New Delhi 110065 and its engineered common facility at Gata #672, Tahsil Akbarpur, Village Kumbhi, NH-2, Kanpur-Dehat, UP-209101, duly authorized by the Uttar Pradesh Pollution Control Board and having another Facility at Mauza Mukimpur, Roorkee-Laksar Road, Roorkee-247664, (Uttarakhand), duly authorized by the UEPPCB, Dehradun to treat, store and dispose of Hazardous Waste and/ or Bharat Oil Company (India) Registered (BOC) a partnership concern registered under the Partnership Act with its registered office at 169 Kailash Hills, New Delhi 110065,

For Rati Pushup Intermediates Pvt. Ltd.

For Bharat Oil & Waste Management Ltd

Page 1

[Signature]
Managing Director

[Signature]
Director

duly registered with Central Pollution Control Board, having its CHWTSDF at E-18, Site IV, Sahibabad Industrial Area, Ghaziabad, (UP), duly authorized by the UPPCB, under the Environment Protection Act 1986 (for short the 'Act') and the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 and / or the E-Waste (Management) Rules 2016 (for short 'The Rules') as amended from time to time, represented by its Director/Partner, as the case may be (hereinafter called as "SECOND PART " which expression shall, unless repugnant to the context or meaning thereof, be deemed to mean and include its successors, nominees and assigns of the Second Part.

WHEREAS First Part is **engaged in Manufacturing of INTERMEDIATES AND BULK DRUGS (A.P.I.'S)** and during the said process/ activities different types of wastes including Hazardous Waste are generated as per Annexure to this Agreement.

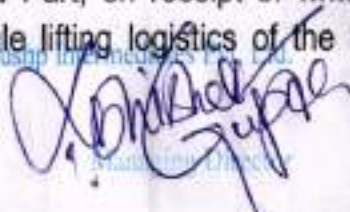
AND WHEREAS the First Part desires that the Hazardous Waste, being generated at its production unit mentioned above, to be lifted, transported, treated, stored and disposed of, by utilizing the services of SECOND PART, as per the Pollution Control Board Authorization (list of Hazardous Wastes and their tentative quantity, which would be generated at the FIRST Part's plant located at **8th KM. JANSATH ROAD, MUZAFFARNAGAR, U.P.-251001, INDIA** is enclosed herewith marked as Annexure.

AND WHEREAS the SECOND PART has represented and assured to First Part that it's Facility in Kanpur/Roorkee/Sahibabad is duly authorized by the concerned State Pollution Control Board and further capable of handling the Hazardous Waste generated at the First Part's premises.

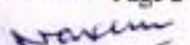
AND WHEREAS First Part has agreed to avail the services of Second Part for treating the Hazardous Wastes, in its above-named facility/facilities.

Now, therefore, those present witnessed and it is hereby declared and agreed by and between the Parties as follows: -

1. The scope of services to be provided by Second Part is limited to lift, transport through authorized vehicles, treat, store and dispose of Hazardous Waste of First Part as per the guidelines prescribed by Pollution Control Board or First Part can also send HW to SECOND Part's Plant directly at its own cost.
2. Second Part, on receipt of written information from FIRST PART, will plan and schedule lifting logistics of the Hazardous Wastes from the premises of FIRST



For Bharat Oil & Waste Management Ltd.



Director

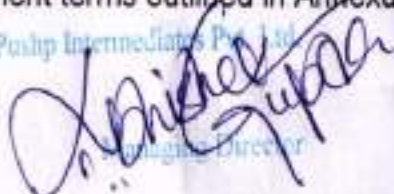
PART within three (3) business days of receipt of such information. First Part shall ensure that Hazardous Wastes must be packed in proper & leak proof Bags or polythene Bags or containers for safe transportation.

3. SECOND PART shall at all times comply with all the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 as amended from time to time framed by MoEF/CPCB.
4. SECOND PART shall indemnify and keep indemnified FIRST PART from all losses, damages, and third-party claims after taking out HW from the premises of the First Part, in cases of non-compliance of statutory norms on the part of SECOND PART.
5. FIRST PART shall keep ready the Hazardous Waste as per the mandate given to SECOND PART for collection, as it is a common facility catering to diverse wastes. SECOND PART shall follow Ministry of Environment & Forest, Central Pollution Control Board and State Pollution Board guidelines, future amendments and latest disposal technologies.
6. FIRST PART shall ensure that the above Hazardous Waste must be packed & labeled as per rules in proper containers/bags so as to prevent any damage/spillage of the material, during transit to SECOND PART factory. Rates are with Containers/Bags, arranged by FIRST PART shall be of Metallic/PVC/Leak proof Bags and kept at the storage place under cover. Container/Bags' weight will also be added in the weight of the material for disposal charges and these are not returnable basis.
7. FIRST PART will provide labour and special Material Handling Equipments at its own cost to lift and load the containers at the FIRST PART premises, in the vehicles for the transportation.
8. FIRST PART has mandatory obligations to provide the entire process detail which leads to generation of Hazardous Waste and its tentative Quantity per month or year to SECOND PART for the purpose of determining the waste characteristics and to decide parameters for comprehensive analysis and process for disposal. However, it is specifically agreed between the parties that the process details provided by FIRST PART shall be kept confidential and Second Part shall not disclose it to any third party without the First Part's prior written consent. This

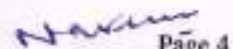
clause shall survive termination for a period of 1 (One) year after the determination of this Agreement for any reason whatsoever.

9. FIRST PART must provide comprehensive Laboratory Analysis Report from a CPCB approved Laboratory of each type of Hazardous Waste for Finger Print Analysis. In the event there are differences in the analysis results; FIRST PART may send its samples to a mutually agreed THIRD PARTY at their own cost. New Comprehensive Analysis Reports shall be provided by FIRST PART when there is a change in the Hazardous Waste characteristics, manufacturing process or change in the product mix etc. Reports must be provided to SECOND PART prior to scheduling pick-up of Hazardous Waste. Reports shall be sent via Electronic mail as well as by courier/speed post to SECOND PART.
10. The comprehensive Analysis Report shall determine the disposal Pathway based on the Waste Characteristics and as per Waste Acceptance Criteria given to the FIRST PART and any other condition/solution that would help in safe disposal of Hazardous Waste. Disposal Pathway is mutually agreed between FIRST PART and SECOND PART to finalize the disposal base or basic USER CHARGES. The base User Charges are defined in Annexure to this Agreement.
11. FIRST PART will maintain and provide details of the HW as per the provisions in various Forms prescribed in the Rules. These Forms can be provided by SECOND PART at cost or be printed by FIRST PART as per the formats given by the SECOND PART.
12. If FIRST PART provides any false information/declarations or withholds information in relation to the provisions of Hazardous Waste rules and / or E-Waste rules any time during the term of this Agreement, all charges of Hazardous Waste during transportation, handling, treatment and disposal including post-disposal period shall remain vested at the responsibility of FIRST PART.
13. The charges for collection, treatment, storage, and disposal facility (hereinafter called as User Charges) will be applicable to FIRST PART/SECOND PART as per Annexure.
14. FIRST PART shall make payment for Waste Management Services to SECOND PART and vice-versa per User Charges and other terms and conditions as per payment terms outlined in Annexure.

For Rafi Pulp Intermediates Pvt. Ltd.


Anil Kumar
Managing Director

For Bharat Oil & Waste Management Ltd.

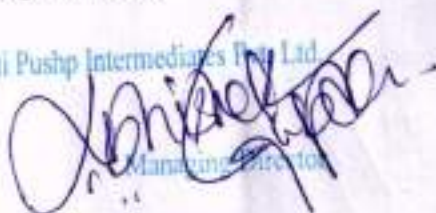

Page 4
Director

15. FIRST PART is responsible to segregate/store/accumulate/fill/load the Hazardous Waste in the container provided by FIRST PART in a neat and proper manner and so also, the container area should be accessible to SECOND PART's vehicle, to come and lift the Waste. The Transporter/SECOND PART reserves the right to reject lifting of Hazardous Waste spilled over the ground and container whose exteriors are soiled by Hazardous Waste spillage due to leakage.
16. In case, for any reason, the SECOND PART's Vehicle is sent back without giving the Hazardous Waste even after being requisitioned by FIRST PART, FIRST PART will have to pay actual transport charges to SECOND PART, **for a minimum load of fifteen (15) MT.**
17. First Part shall at all times comply with all the provisions of the Acts and Rules from time to time in force and the Guidelines issued from time to time regarding handling of Waste involving the collection, storage, transportation and delivery thereof, and shall, without prejudice to the generality of the foregoing, also comply with all Environmental Protection Laws, Safety Laws and Regulations from time to time in force and the Rules, Regulations and Notifications made or issued thereunder from time to time. In the event of First Part committing any breach of the terms of this clause of Agreement, FIRST PART shall indemnify and keep indemnified SECOND PART from and against all claims, payments, costs and actions of whatsoever nature brought against or sustained or incurred by SECOND PART arising from or as a result of such breach committed by FIRST PART in that behalf, provided these are proved.
18. FIRST PART & SECOND PART shall indemnify and keep indemnified each other at all times from and against all actions, suits, proceedings, claims, third party claims, costs, payments and expenses of whatsoever nature made or suffered or incurred by the other PART whether by reason of or by virtue of non-performance or non-observance or non-compliance by either PART, of any terms and conditions of this Agreement or of the relevant Act, the Rules and the Guidelines.

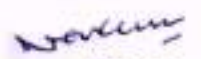
IT IS FURTHER HEREBY AGREED BY AND BETWEEN THE PARTIES AS UNDER:

19. This Agreement is valid for a period of five (5) years from date of signing this agreement.

For Rati Pushp Intermediaries Pvt. Ltd.


Managing Director

For Bharat Oil & Waste Management Ltd.


Director

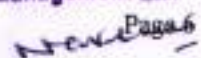
Page 5

20. FIRST PART shall use the services of the SECOND PART during the period of this contract to dispose generated hazardous waste at agreed prices, while the agreement is in force. SECOND PART must legally and safely collect, transport, treat, dispose hazardous waste from FIRST PART during the agreed period per rates agreed while this Agreement is in force and payments made as per Agreement terms.
21. If all the terms and conditions as per the clauses of this Agreement are adhered to by FIRST PART, it will be SECOND PART's responsibility to lift, transport, treat and dispose of the Hazardous Wastes generated by FIRST PART in accordance with prevailing Govt. Rules and FIRST PART shall not have any liability whatsoever in this regard.
22. The main mode of final disposal of HW shall be Incineration/Pre-Processing/Co-Processing/Land-filling and ash would be cemented and landfilled. The modes of disposal are dependent on the Hazardous Wastes' characteristics and FIRST PART shall not have any liability whatsoever in this regard.
23. The User Charges are subject to Annual Revision on the basis of Govt. of India Wholesale Price Index [WPI], (Commodities Index-All India) and once a quarter in the event of escalation of fuel costs and on major price escalations, escalation of fuel costs viz., Power Tariff, change in Disposal Technologies/Method, Wage Hike etc., to name a few. For the purpose of escalation in fuel cost, 30% of freight rate will be considered as fuel element of the cost.
24. SECOND PART reserves the right to cancel this Agreement if FIRST PART fails/refuses to pay the bills/dues as per the payment terms applicable to FIRST PART as mentioned herein and in Annexure. A Notice period of maximum Fifteen (15) days will be allowed from the date of lifting of material. If FIRST PART fails to pay in settlement of the Invoice, it shall be liable to pay interest @ 18% per annum and this may also result in cancellation of First Part's Membership, forfeiture of deposit, and termination of this Agreement. Repeated defaults and violation of payment terms will also result in cancellation of Membership and forfeiture of Membership deposit.
25. Hazardous Wastes that require other alternate destruction technologies shall be handled at SECOND PART's facility. However, the prices for such treatment techniques shall be determined on a case-to-case basis on their characteristics.

For Rati Pusho Intermediates Pvt. Ltd.


Managing Director

For Bharat Oil & Waste Management Ltd.


Page 6

Director

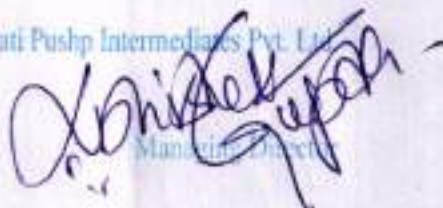
26. Notwithstanding anything contained herein, neither Part hereto shall be liable for damages or have this Agreement terminated for any delay or default in the performance of such Part hereunder if such delay or default in performance derives from conditions beyond the reasonable control of such Part, including but not limited to, acts of God, fires, floods, extreme drought, riots, work stoppages, embargoes, governmental actions or damage to the plant or facility or any cause unavoidable or beyond the control of either part including any arbitrary ruling by the Government prohibiting the handling of the Waste or continuing domestic or international problems such as wars, pandemic or natural calamities.
27. This Agreement shall be deemed to represent the entire Agreement between the parties hereto regarding the subject matter hereof and shall supersede, cancel and replace all prior agreements or arrangements, if any, in this behalf, signed/entered into by and between the parties hereto.
28. This Agreement is on principal to principal basis and nothing contained herein shall be deemed to constitute a partnership, joint venture or agency by and between the parties hereto.
29. This Agreement may be modified or amended only by writing, duly executed by or on behalf of the parties hereto.
30. Any terms and conditions of this Agreement may be waived at any time by the party that is entitled to the benefit thereof. Such waiver must be in writing and must be executed by an authorized officer of such party. A waiver on one occasion will not be deemed to be a waiver of a similar occasion or any other similar breach or non-fulfillment on a future occasion.
31. If any provision of this Agreement is held to be illegal, invalid or unenforceable under any present or future laws, such provisions shall be deemed terminable and the remaining parts and provisions of this Agreement shall remain in full force and effect.
32. Either Part shall have the right to terminate this Agreement upon giving 30 days written notice to the other Part with a reasonable cause.
33. It is clearly and expressly understood by and between the parties that the activity of lifting, transportation, treatment, storage and disposal of Hazardous Wastes is

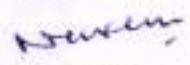
an independent contract and it does not come within the purview of the FIRST PART's manufacturing and selling activities. It is also clearly understood and confirmed by and between the parties that this contract is for performance of work and not for supply of Labour.

34. Nothing contained in these terms and conditions shall be construed as creating any relationship either direct or indirect of employer and employee between the FIRST PART and the persons engaged by SECOND PART. The FIRST PART shall have no liability towards such persons and such persons will not have any claim whatsoever against the FIRST PART for salary, wages, provident fund, gratuity, retrenchment compensation or any other compensation for accident or death or any other claim whatsoever.
35. Any dispute arising on any clause or clauses of this Agreement and the contents of the Annexure hereto between FIRST PART and SECOND PART shall be referred to an Arbitrator of repute by SECOND PART. The Arbitration shall be conducted in accordance with the provisions of the Arbitration and Conciliation Act, 1996 with amendments thereof. The arbitration proceedings shall be conducted in English and shall take place at New Delhi, India. The arbitral award, including interim awards, if any, shall be final and binding upon both parties.
36. Subject to the provisions of the foregoing clause, FIRST PART and SECOND PART mutually agree that the courts of New Delhi alone, to the exclusion of any other, shall have the jurisdiction.
37. SECOND PART will lift and dispose waste from FIRST PART only if FIRST PART has valid & active legal authorization/consent to generate waste and operate the specified unit by relevant SPCB. First Part states that it is authorized to generate Hazardous Waste vide UEPPCB approval No. Dated.....valid till.....(copy attached), and has valid unexpired Consent to Operate under Air/Water Act No. 25/26 & 21/22 Dated **30/12/2018** valid till **31/12/2023** (copy attached). The actual operation of collection/Transportation/Storage/Treatment/Disposal of Hazardous Waste from First Part will start only after receiving the copy of valid approval of Air/Water/HW Consents from First Part. First Part will notify promptly in 30 days to SECOND PART if it has been ordered **closure** by relevant state pollution control board or any court of jurisdiction over it and that during the term of this agreement.

For Bharat Oil & Waste Management Ltd.

For Rati Pushp Intermediates Pvt. Ltd.


Abhishek Gupta
Managing Director


Navin
Director

Page 8

This Agreement is signed on this 18TH of AUGUST,2020 at New Delhi.

For RATI PUSHUP INTERMEDIATES Pvt. Ltd. <i>For Rati Pushup Intermediates Pvt. Ltd.</i>  ABHISHEK GUPTA (Managing Director)		For Bharat Oil & Waste Management Ltd/ Bharat Oil Company (I) Regd. <i>For Bharat Oil & Waste Management Ltd.</i>  Director /Partner (Naresh Manglani)/BT Manglani
Witnesses :  Atul Kumar Gupta 09837034764		Witnesses :  Sandeep Kumar 9717700119 Sandeep.kumar@bharatoil.com
GST No. PAN No. CIN No. Phone No. Email Id	09AAF9CR9874F1ZS AAF9CR9874F U24233UP2012PTC051637 +91-9837473348 ratipushp@yahoo.com	

ANNEXURE - A

Waste Management & Handling Service Charge

This annexure is in conjunction with agreement signed between M/s RATI PUSHUP INTERMEDIATES Pvt. Ltd., 8th KM. JANSATH ROAD, MUZAFFARNAGAR, U.P.-251001, INDIA and Bharat Oil & Waste Management Ltd on date 18/08/2020.

First part WILL PAY AN AMOUNT OF Rs.15,000 (Fifteen Thousand only) plus, application GST @ 18% to second part TOWARDS Non-Refundable Lifetime Membership Deposit which will be applicable for lifetime from the date of signing of this Agreement and membership will be renewed every year without any extra charges.

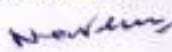
Category – A: shall be paid by Second Part

S:NO	Type of Hazardous Wastes	Quantity/ Annum	Second Part Rates
1.	Used Oil	50 Ltrs.	Rs.2500/- * (Two Thousand Five Hundred only) per drum of 220 liters
2.	HW Empty Barrels 210 liters	100	Rs.130/- (One Hundred Thirty) per drum
3.	Waste Battery without water & sludge	50 Kg.	Rs.16/- (sixteen) per kg
4.	E-waste (Electrical/ Electronics) i.e. Desktop (ITEW2), Laptop (ITEW3), Monitor (BOCIT2), CPU (ITEW), UPS ((BOCIT7: (Recyclable & in good condition having proper power supply, Memory, mother board, connection, cabinet, DVD Drive etc.)	50 Kg.	Rs. 13.00 per Kg (Rupees Thirteen per kg only)

*Used Oil Price is conditional, If Crude Oil Price on NYSE drops below USD31/barrel in any quarter of this agreement then Used Oil rates will be FOC – Free Of Cost.

- Sr.no.1 waste must comply with parameters as per Schedule V Part A of HW Rules, i.e. without water, sludge. SECOND PART will only pay for fully filled drums of 210 liters capacity. Part filled drums with quantity less than 210 litres will be free of charge.
- Quoted rates are inclusive of GST, with container.
- We will lift full loaded capacity of vehicle.

For Bharat Oil & Waste Management Ltd.


Director

For Rati Pushup Intermediates Pvt. Ltd.


Managing Director

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01. USER CHARGES: FIRST PART will have to pay the following charges for the Waste Management Services provided by **SECOND PART**:

Category –B: shall be paid by **FIRST PART**:

Collection, Treatment, Storage and Disposal Charges

S:NO	Hazardous Wastes	Quantity/Ann um	Second Part Rates
1	Paint/Grinding/ETP/Phosphate Sludge/asbestos/Boiler Ash	1000 Kg.	5.Rs. per kg(Five only)
2	Waste Oil mix with water/Oily Sludge/ waste Ink, Waste washed water	NIL	20.Rs. per kg(Twenty only)
3	Cotton Waste, Used Hand Gloves, Coolant, Waste Chemicals etc	100 Kg	20.Rs. per kg(Twenty only)
4	E-Waste other than mentioned in Category-A	100 Kg.	20.Rs. per kg(Twenty only)
5	Used DG set Air/Oil Filters	15	Rs.45 each
6	Used car Oily Filters	15	Rs.45/-kg (Forty Five)
7	Empty small Containers below 200ltr capacity	100 Kg.	20.Rs. per kg(Twenty only)
8	Transport Charge		As per actual

Transportation cost shall be paid by the **FIRSTPART TO SECOND PART** for BOWML's,

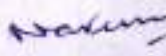
02 TERMS & CONDITIONS:

a) Additional MoeF Post-Closure Monitoring / Escrow Fund Charge

A charge of @ 5% on the total of above charges shall be applicable and levied on the actual waste quantities disposed for landfill (SLF) waste. This charge is deposited in an escrow account to pay for any emergency remediation and post closure period of TSDF. This is required by MoeF, Government of India and is applicable to all landfill waste (SLF).

b) A minimum billing of Rs.4000/-(Rupees Four thousand) Plus GST will be applicable for a load up to 200kg at a time and for load above 200kg, rates quoted below will be applicable and to be paid by **FIRST PART**.

For Bharat Oil & Waste Management Ltd.


Director

For Rafi Pushp Intermedics Pvt. Ltd.


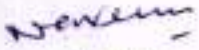

Managing Director

- c) Further if there is no lifting of any Hazardous waste within a quarter, the minimum charges of Rs. 4000.00 plus taxes is to be paid by the FIRST PART until termination of the agreement.
- d) GST or other taxes as applicable by GOI shall be paid by FIRST PART.
- e) **FIRST PART** shall ensure that the above Hazardous Waste must be packed in proper containers/gunny bags so as to prevent any damage/spillage of the material, during transit at **FIRST PART** plant. Containers/Gunny bags arranged by **FIRST PART** shall be of metallic/PVC and kept at the storage place under cover. **BOWML WILL NOT ACCEPT** leaky, open, unsealed containers or gunny bags.
- f) **FIRST PART** shall deliver their waste at **SECOND PART** plant located at **E-18, Site 4 Sahibabad Industrial Area, Ghaziabad** at its own cost. If **SECOND PART** lifts the material transportation cost shall be borne by **FIRST PART** as per actual. Loading is in scope of **FIRST PART**.
- g) The transport charges are subject to revision if fuel prices are increased or decreased by Government beyond 10% from the price on the date of signing this Annexure.
- h) The above transportation cost is for material of upto 1.1 MT/m³ density. If density is lower than 1.1 MT/m³, the transport cost will be increased on pro-rata basis as the lighter waste material occupies more volume.
- i) Leak-proof packing & proper correct labeling as per HW Rules will be ensured by **FIRST PART** for safe transportation. Waste material shall be properly packed, sealed and labelled by the **FIRST PART** as per Rules.
- j) A maximum of 1 hour will be allowed for lifting, loading & paperwork upon arrival of truck/container at site of the **FIRST PART**. **FIRST PART** agrees to pay Detention Charges of Rs.5000/- (Rupees five thousand) only, per day if the vehicle is held overnight.
- k) As per Rule 8 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 as amended **FIRST PART** (Hazardous

Waste Generator) needs to send/dispose the Hazardous Waste within 90 days from their Plant failing which agreement can be terminated without any notice.

- l) For Category (A) Payment shall be made by SECOND PART in favour of FIRST PART by Cheque/DD/NEFT within a week of receipt of FIRST PART Invoice. (Used/ Waste Oil should meet parameters as per Schedule V(A) of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 as amended).
- m) For Category (B) FIRST PART shall pay to SECOND PART Advance Payment by cheque/Demand Draft/ NEFT.
- n) NO CASH TRANSACTION WILL BE ENTERTAINED. However, besides cheque, SECOND PART accepts payments under NEFT/ RTGS route also. FIRST PART have to declare the quantity of hazardous waste generation on Quarterly/ Annual basis, while applying for fresh Membership.
- o) TAXES / LEVIES:- All Government / Municipal Taxes / Duties/ Levies/ Octroi / Service Tax or GST / Tolls etc, as applicable from time to time, will be payable by FIRST PART.
- p) There shall be NO goods / waste sent (or given) by FIRST PART to SECOND PART other than mentioned in this Annexure or mutually agreed & signed between the parties through an Annexure along with MoeF Approved Laboratory Test Reports of each waste type.
- q) If FIRST PART sends goods which are not lawful, controlled substance, radioactive, bio-medical, explosive and/or not authorized/approved to be accepted by the SECOND PART (facility operator) by SPCB then the same shall be notified to SPCB and FIRST PART; The waste shall be refused and returned to the FIRST PART at full transport, handling cost payable by FIRST PART to SECOND PART.
- r) If FIRST PART sends waste / goods which are as agreed upon yet not matching within +-10% the test analysis report provided by the FIRST PART OR IF FIRST PART sends waste/goods which are Hazardous Waste but NOT as agreed upon THEN - the SECOND PART will charge as decided by SECOND PART and FIRST

PART agrees to pay immediately upon demand the Laboratory Comprehensive Test Analysis Charge, Transport, Storage, Disposal, Treatment Charge along with any applicable Government Taxes, MoeF Escrow Fee etc. SECOND PART will notify the FIRST PART, CPCB (HW Cell) and SPCB of the Exception. The complete liability, risk and costs of such goods/Wastes shall be on FIRST PART and the FIRST PART shall be liable to pay all the charges as demanded by the SECOND PART and FIRST PART shall indemnify the SECOND PART for / during the transport, storage, unloading, treatment, disposal for the said waste.


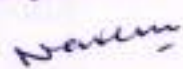
<p>For RATI PUSHP INTERMEDIATES Pvt. Ltd.</p> <p>For Rati Pushp Intermediates Pvt. Ltd.  Managing Director</p> <p>ABHISHEK GUPTA (Managing Director)</p> <p>(First Part)</p>	<p>For Bharat Oil & Waste Management Ltd/ Bharat Oil Company (I) Regd.</p> <p>For Bharat Oil & Waste Management Ltd.  Director</p> <p>Director /Partner (Naresh Manglani)/BT Manglani</p> <p>(Second Part)</p>
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ANNEXURE - B

This annexure is in conjunction with agreement signed between FIRST PART and SECOND PART on date **18th August, 2020**.

Lab Analysis Charge (Optional, Applicable when SECOND PART service is used)

Comprehensive Analysis Charge of Laboratory is Rs.12,500/- (Rupees Twelve thousand five hundred only) for complete analysis of hazardous waste as per CPCB Guideline (if ordered and applicable) excluding service tax/GST (extra). FIRST PART can / may use a Government Recognized or MoeF approved 3rd party laboratory and provide test reports to the TSDF, which are conducted within the last 180 days. Comprehensive Analysis has to be carried out for any new waste streams or any change in manufacturing process as per Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 and CPCB Guidelines. FIRST PART must inform the facility (SECOND PART) if any change in manufacturing process prior to waste pickup, disposal through SECOND PART.

<p>For RATI PUSHP INTERMEDIATES Pvt. Ltd.</p> <p>For Rati Pushp Intermediates Pvt. Ltd.  Managing Director</p> <p>ABHISHEK GUPTA (Managing Director)</p> <p>(First Part)</p>	<p>For Bharat Oil & Waste Management Ltd/ Bharat Oil Company (I) Regd.</p> <p>For Bharat Oil & Waste Management Ltd.  Director</p> <p>(Naresh Manglani)/BT Manglani Director /Partner</p> <p>(Second Part)</p>
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U.P. Pollution Control Board

CONSENT ORDER

Ref No. -
43052/UPPCB/MuzaffarNagar(UPPCBRO)/CTO/air/MUZAFFARNA
GAR/2018

Dated : 30/12/2018

To ,

Shri ABHISHEK GUPTA
M/s RATI PUSHP INTERMEDIATES PVT LTD
8TH KM STONE, jansath road
MUZAFFARNAGAR

Sub : Consent under section 21/22 of the Air (Prevention and control of Pollution) Act, 1981 (as amended)
to M/s. RATI PUSHP INTERMEDIATES PVT LTD

Reference Application No. 3951938

Dated : 30/12/2018

1. With reference to the application for consent for emission of air pollutants from the plant of M/s RATI PUSHP INTERMEDIATES PVT LTD. under Air Act 1981. It is being authorised for said emissions, as per the standards, in environment, by the Board as per enclosed conditions .
2. This consent is valid for the period from 01/01/2019 to 31/12/2023 .
3. In spite of the conditions and provisions mentioned in this consent order UP Pollution Control Board reserves its right and powers to reconsider/amend any or all conditions under section 21 (6) of the Air (Prevention and Control of Pollution) Act, 1981 as amended.
This consent is being issued with the permission of competent authority .

For and on behalf of U.P. Pollution Control Board

PARAS
NATH

Digitally signed
by PARAS NATH
Date: 2018.12.28
19:33:29 +05'30'

C.E.O
C-3

Enclosed : As above
(condition of consent):

Copy to: Regional Office, U.P. Pollution Control Board, Muzaffarnagar

PARAS
NATH

Digitally signed
by PARAS NATH
Date: 2018.12.28
19:31:18 +05'30'

C.E.O
C-3

U.P. Pollution Control Board

Dated : 30/12/2018

CONDITIONS OF CONSENT

1. This consent is valid only for the approved production capacity of L base 250 Kg/month, D base 100 Kg/month, CHLORAMPHENICOL POWDER I.P. 350 Kg/month and CHLORAMPHENICOL PALMITATE I.P 100 Kg/month.
- 2(a). The maximum rate of emission of flue gas should not be more than the emission norms for the stacks.

Air Pollution Source Details					
S.No	Air Pollution Source	Type of Fuel	Stack No.	Parameters	Height
1	Baby Boiler 0.25 TPH	Diesel	1	Particulate Matter	12 mt. from G.L

- 2(b). The emissions by various stacks into the environment should be as per the norms of the Board .

Emission Quality Details Detail			
S.No	Stack No	Parameter	Standard
1	1	Particulate Matter	As per E.P Rules 1986
2	1	Sulphur Dioxide	As per E.P Rules 1986
3	1	Oxides of Nitrogen	As per E.P Rules 1986

3. Quantity of other pollutants should also be as per the norms prescribed by the Board/MOEF & CC/or otherwise mandatory .
4. The equipment for air pollution control system and monitoring ,as proposed by the industry and approved by the Board should be installed in their premises itself .
5. The modification or installation in the existing pollution control equipments should be done only by prior approval of Board .
6. The operation of air pollution control system and maintenance be done in such a way that the quantity of pollutants should be in accordance with the standards prescribed by the Board/MoEF & CC/or otherwise mandatory .
7. Unit should do provisions for fugitive emissions chimney/stack as per the norms of the Board/MOEF & CC/or otherwise mandatory .
8. The unit should submit the stack emissions monitoring report within one month from issuance of consent order along with the point wise compliance report of the consent order . Further quarterly monitoring report should be submitted .

Specific Conditions:

1. The industry should be operated in such a manner that it does not adversely affect the environment and the solid waste generated such as ash etc. be disposed in eco friendly manner.
2. Any source of emission other than that mentioned in the Air consent seeking application will not be permitted by the Board.
3. The industry should ensure the operation of the air pollution control system (APCS) in such a manner that the air emission conforms with the standards prescribed under the E.P Act 1986 as amended and will ensure the continuous and uninterrupted data supply from the OCEEMS to the SPCB and CPCB server.
4. The industry shall submit the point wise compliance report of the conditions imposed in the CTO issued to the unit for the year 2018 and the audited balance sheet for the current year within two months otherwise this CTO may be revoked.
5. This consent is valid only for products and quantity mentioned above. Industry shall obtain prior approval before making any modification in product/ process /fuel/ plant machinery failing which consent would be deemed void.
6. Industry shall abide by orders / directions issued by Hon'ble Supreme court Hon'ble High Court, Hon'ble National Green tribunal, Central Pollution Control Board and U.P Pollution Control Board for protection and safe guard of environment from time to time.
7. Industry shall submit monitoring reports of all stacks and ambient air quality from a certified /approved laboratory under E.P. Act 1986.
8. Industry shall comply with various provisions of Air (Prevention and Control of Pollution) Act 1981 as amended, Water (Prevention and Control of Pollution) Act 1974 as amended and all other applicable rules notified under E.P. Act 1986.
9. The unit shall submit the audited balance sheet for the current year and the details of fees deposited during last three years within a month.
10. The unit shall obtain prior consents in the event of any addition of new emission generation sources such as- Boiler/ Furnace/ Heaters/ D.G. Sets or alteration of existing emission sources in accordance with section- 21/22 of air Act 1981 (as amended respectively).
11. The use of Pet coke and Furnace oil as a fuel is restricted in compliance of the Hon'ble Supreme court order.
12. The Industry will use minimum 20% Bio Briquette as fuel in the Boiler depending upon its availability.
13. Industry shall submit Environmental Statement in prescribed format as per rule no.14 as per E.P Rules 1986.
14. Minimum 33% of the land on which industry is established will be covered by the plantation of tall trees of suitable species as per the guidelines set up by the Board vide its Office Order no.H-16405/220/2018/02 dt. 16/02/2018. The copy of this guideline is available at URL http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf.

Issued with the permission of competent authority .

For and on behalf of U.P. Pollution Control Board .

PARAS Digitally signed
by PARAS NATH
Date: 2018.12.30
10:51:45 +05'30' C.E.O
NATH C-3



U.P. Pollution Control Board

CONSENT ORDER

**Ref No. -
43057/UPPCB/MuzaffarNagar(UPPCBRO)/CTO/
water/MUZAFFARNAGAR/2018**

Dated : 30/12/2018

To ,

**Shri ABHISHEK GUPTA
M/s RATI PUSHP INTERMEDIATES PVT LTD
8TH KM STONE, jansath road
MUZAFFARNAGAR**

**Sub : Consent under Section 25/26 of The Water (Prevention and control of Pollution) Act, 1974
(as amended) for discharge of effluent to M/s. RATI PUSHP INTERMEDIATES PVT LTD**

Reference Application No :3952065

Dated :30/12/2018

1. For disposal of effluent into water body or drain or land under The Water (Prevention and control of Pollution) Act,1974 as amended (here in after referred as the act) M/s. RATI PUSHP INTERMEDIATES PVT LTD is hereby authorized by the board for discharge of their industrial effluent generated through ETP for irrigation/river through drain and disposal of domestic effluent through septic tant/soak pit subject to general and special conditions mentioned in the annexure ,in reference to their foresaid application .
2. This consent is valid for the period from 01/01/2019 to 31/12/2023 .
3. In spite of the conditions and provisions mentioned in this consent order UP Pollution Control Board reserves its right and powers to reconsider/amend any or all conditions under section 27(2) of the Water (Prevention and Control of Pollution) Act, 1974 as amended .

This consent is being issued with the permission of competent authority .

For and on behalf of U.P. Pollution Control Board

Digitally signed
by PARAS NATH
Date: 2018.12.30
18:22:48 +05'30'

**C.E.O
C-3**

**Enclosed : As above
(condition of consent):**

Copy to: Regional Office, U.P. Pollution Control Board, Muzaffarnagar

PARAS NATH Digitally signed
by PARAS NATH
Date: 2018.12.30
18:21:11 +05'30'

**C.E.O
C-3**

U.P. POLLUTION CONTROL BOARD, LUCKNOW

Annexure to Consent issued to M/s.RATI PUSHUP INTERMEDIATES PVT LTD vide

Consent Order No. 3952065/ Water

Dated : 30/12/2018

CONDITIONS OF CONSENT

1. This consent is valid only for the approved production capacity of L base 250 Kg/month, D base 100 Kg/month, CHLORAMPHENICOL POWDER I.P. 350 Kg/month and CHLORAMPHENICOL PALMITATE I.P 100 Kg/month..

2. The quantity of maximum daily effluent discharge should not be more than the following :

Effluent Discharge Details			
S.No	Kind of Effluent	Maximum daily discharge, KL/day	Treatment facility and discharge point
1	Domestic	0.5 KLD	Septic Tank
2	Industrial	0.3 KLD (Evaporated through solar evaporation tank)	ETP

3. Arrangement should be made for collection of water used in process and domestic effluent separately in closed water supply system. The treated domestic and industrial effluent if discharged outside the premises, if meets at the end of final discharge point, arrangement should be made for measurement of effluent and for collecting its sample. Except the effluent informed in the application for consent no other effluent should enter in the said arrangements for collection of effluent. It should also be ensured that domestic effluent should not be discharged in storm water drain .

- 4 a. The domestic effluent should be treated in treatment plant so that the should be in conformity with the following norms dated treated effluent .

Domestic Effluent		
S.No	Parameter	Standard
1	Total Suspended Solids	As per E.P Rules 1986
2	BOD	As per E.P Rules 1986
3	COD	As per E.P Rules 1986
4	Oil & Grease	As per E.P Rules 1986
5	Quantity of Discharge	0.5 KLD

- 4 b. The industrial effluent should be treated in treatment plant so that the treated effluent should be in conformity with the following norms. .

Industrial Effluent		
S.No	Parameter	Standard

5. Effluent generated in all the processes, bleed water, cooling effluent and the effluent generated from washing of floor and equipments etc should be treated before its disposal with treated industrial effluent so that it should be according to the norms prescribed under The Environment (Protection) Act,1986 or otherwise mandatory .
6. The other pollutant for which norms have not been prescribed, the same should not be more than the norms prescribed for the water used in manufacturing process of the industry .
7. The method for collecting industrial and domestic effluent and its analysis should be as per legal Indian standards and its subsequent amendments/standards prescribed under The Environment (Protection) Act, 1986.
8. The treated domestic and industrial effluent be mixed (as per the provisions of Condition No. 2) and disposed of on one disposal point. This common effluent disposal point should have arrangement for flow meter/V Notch for measuring effluent and its log book be maintained .

Specific Conditions:

- 1- This consent is only valid for the discharge of the domestic effluent and Industrial effluent will completely evaporated through evaporation tank and discharge of industrial effluent is not permitted under any circumstances.
- 2- In the industry, flow meter to be installed in all water abstraction points and usage of fresh water to be minimized. Unit must strictly maintain zero liquid discharge of effluent outside premises into drain/river/water body and on land.
- 3- The industry will have to ensure permission from the CGWA for ground water extraction and it will be the responsibility of the industry to comply with the various conditions of the permission taken.
- 4- The industry shall submit the point wise compliance report of the conditions imposed in the CTO issued to the unit for the year 2018 and the audited balance sheet for the current year within two months otherwise this CTO may be revoked.
- 5- If the CPCB or UPPCB issues the Closure order against the industry this consent order stands automatically suspended for that period.
- 6- The industry shall submit Environmental Statement in prescribed form V as per rule no.14 of E.P Rules 1986.
- 7- This consent is valid only for products and quantity mentioned above. Industry shall obtain prior approval before making any modification in product/process/fuel/Plant machinery failing which consent would be deemed void.
- 8- The industry shall abide by orders / directions issued by Hon'ble Supreme Court Hon'ble High Court, Hon'ble National Green Tribunal, Central Pollution Control Board and U.P Pollution Control Board for protection and safe guard of environment from time to time.
- 9- The industry shall comply with various provisions of Air (Prevention and Control of Pollution) Act 1981 as amended, Water (Prevention and Control of Pollution) Act 1974 as amended and all other applicable rules notified under E.P. Act 1986 and the various orders issued by the MOEF&CC, CPCB and SPCB in time to time .
- 10- Industry shall comply with various Waste Management Rules as notified by MoEF&CC i.e. Hazardous and Other Wastes (Management and Transboundary movement) Rules, 2016,
11. Minimum 33% of the land on which unit is established will be covered by the plantation of tall trees of suitable species as per the guidelines set up by the Board vide its Office Order no.H-16405/220/2018/02 dt. 16/02/2018. The copy of this guideline is available at [URL:http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf](http://www.uppcb.com/pdf/Green-Belt-Guidle_160218.pdf).

Issued with the permission of competent authority .

For and on behalf of U.P. Pollution Control Board .

PARAS
NATH

Digitally signed
by PARAS NATH
Date: 2018.11.20
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C.E.O
C-3



Government of India
Form GST REG-06
[See Rule 10(1)]

Registration Certificate

Registration Number : 09AAFCR9874F1ZS

1.	Legal Name	RATI PUSHP INTERMEDIATES PRIVATE LIMITED			
2.	Trade Name, if any	M/S RATI PUSHP INTERMEDIATES (P) LTD.			
3.	Constitution of Business	Private Limited Company			
4.	Address of Principal Place of Business	8th, KM. STONE, JANSATH ROAD, SHER NAGAR, Muzaffarnagar, Uttar Pradesh, 251001			
5.	Date of Liability	01/07/2017			
6.	Period of Validity	From	01/07/2017	To	NA
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority				
Signature					
Signature Not Verified Digitally signed by DS GOODS AND SERVICES-TAX NETWORK Date: 2018.07.20 13:31:02 IST					
Name					
Designation					
Jurisdictional Office					
9.	Date of issue of Certificate	28/07/2018			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

This is a system generated digitally signed Registration Certificate issued based on the deemed approval of application on 01/07/2017.





Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF : ACTIVE PHARMACEUTICAL INGREDIENTS (API'S) & INTERMEDIATES

Works : 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P.) India + Mobile : 9837473348

Postal Add. : Ramji Sadan, 494-95, Kambalwala Bagh, New Mandi,
Muzaffarnagar-251001 (U.P.) India

e-mail : ratipushp@yahoo.com + website : www.ratipushp.com

18th Aug, 2020

To,

**M/s Bharat Oil and Waste Management Ltd.
(BOWML)
11, Basement, Community Center,
East Of Kailash,
New Delhi - 110 065**

Kin./Att. : Mr. Sandeep Kumar

Sub.:- Regarding Membership for Waste Disposal.

Respected Sir,

As discussed, We are sending all documents and agreement required for the membership of waste disposal. In this regard, A NEFT of Rs. 17,700/- dated 21/08/2020 with UTR No. BKIDN20234309915 has been done in favor of Bharat Oil and waste management Ltd.

Please consider it and provide the membership.

I will be highly thankful to you.

Thanking you.

Sincerely,

RATI PUSHP INTERMEDIATES Pvt. Ltd.

**Abhishek Gupta
(Managing Director)**



Since 1878
Bharat Oil & Waste Management Ltd.

Petroleum Refining, Hazardous Waste Management & Incineration
Refiners & Manufacturers of Industrial Lubricating Oils

ISO 9001-2000



MEMBERSHIP CERTIFICATE

M / s. Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar-251001, UP

is a registered member of our facility



BOWML/K/3868/20

Gata No. 672,706Cha Vill. Kumbhi, Akbarpur Road, NH-2 Kanpur-Dehat-209101, UP

for safe, legal & scientific Disposal of Hazardous Waste

Member # : BOWML/K/3868/20

Expiry Date : August 17, 2023



Scan & Verify

One may verify 'active' membership by calling

Bharat Oil & Waste Management Ltd. at

011-4100 0710, 2981 6466 or Email: sales@bharatoil.com

For Bharat Oil & Waste Management Ltd.

Pragati Rohtagi	Digitally Signed By:Pragati Rohtagi
Sales Cordinator	Date: 2022-12-17 10:16:31
sales@bharatoil.com	IP: 49.36.182.174
	ID: Q+7R6OZ5BZDAu6FuAkQ6Xw==
	Click here to E-verify

Authorized Signatory

For Bharat Oil & Waste Management Ltd.

Sunder K Kukreja	Digitally Signed By:Sunder K Kukreja
GM (Admin & Fin.)	Date: 2022-12-17 10:50:51
sales@bharatoil.com	IP: 49.36.182.174
	ID: sqHe8sUdh9RPwc9paNxFFA==
	Click here to E-verify

Authorized Signatory



Sales Office :

11, Community Centre, LGF, East of Kailash
New Delhi - 110 065, India

Regd. Office :

11 LGF, Community Center, East of Kailash, New Delhi-110065, India
Ph: 41000710, 26210205 Telefax : 26216466

Email : sales@bharatoil.com

www.bharatoil.com

Facilities :

- E - 18, Sahibabad Industrial Area, Site 4 Ghaziabad - 201 010 (UP) India
- Gata No. 672, Vill. Kumbhi, NH - 2 Ramabai Nagar - 209 101 (U.P.)
- Mauza Mukimpur Roorkee-Lakshar Road Roorkee - 247664 (UK)
- SIDCUL - Haridwar (UK)

FORM 6
[See rule 19]

Occupier's Copy

E- WASTE MANIFEST

S.No.: 8901

1 Occupier's Name & Mailing Address (including Phone No. and email)	Rati Pushp Intermediaries Pvt Ltd 8 th Km Sarathi Road MNV UP
2 Sender's Authorization No. If applicable	
3 Manifest Document No.	D-000001 Dt 30/6/23
4 Transporter's Name & Address (including Phone No. and email)	Pardiy - self
5 Type of Vehicle	(Truck / Container / Special Vehicle)
6 Transporter's Registration	
7 Vehicle Registration No.	UP12BT0924
8 Receiver's Name & Mailing Address (including Phone No. and email)	(I) BHARAT OIL COMPANY (I) REGD E-18, Site-IV, Sahibabad Industrial Area, Ghaziabad Tel: 0120-4167924, E-mail:sales@bharatoil.com
(II) BHARAT OIL & WASTE MANAGEMENT LTD. Mauza Mukimpur, Roorkee-Lakshar Road, Roorkee - 247664 UK Tel. 08874207664, E-mail:sales@bharatoil.com	(III) BHARAT OIL & WASTE MANAGEMENT LTD. Plot # 672, Sikandra Road, NH-2, Kumbhi Village, Tehsil Akbarpur, Kanpur Dehat, UP. Tel : 0512-2285296, E-mail:sales@bharatoil.com
9 Receiver's Authorization No. if applicable	(I) G-132/Haz Order-30/13 (II) UEPPCB/HO/Haz-B-06/11/290 (III) 93/C-2/Haz/657/13



10 Description of E-Waste	Code	Desc.	Qty.	Code	Desc.	Qty.	Code	Desc.	Qty.
		Ewaste	SK						

11 Name and Stamp of Sender* (Manufacturer or Producer or Bulk Consumer or Collection Centre or Refurbisher or Dismantler) :

Signature: For Rati Pushp Intermediaries (Auth. Sign.)

Month: 06, Day: 20, Year: 2022

12 Transporter Acknowledgement of Receipt of E-Waste

Name & Stamp: Signature:

Month: 06, Day: 30, Year: 2022

13 Receiver* (Collection Centre of Refurbisher or Dismantler or Recycler) Certificate for Receipt of E-Waste (* As Applicable)

Name & Stamp: Signature:

Month: 06, Day: 30, Year: 2023



CODE	E WASTE TYPE	CODE	E WASTE TYPE	CODE	E WASTE TYPE	CODE	E WASTE TYPE
ITEW2	PC CPU	ITEW15	Cellular telephones	CEEW1	Television sets (including sets based on Liquid Crystal Display and Light Emitting Diode technology)	BOCCE3	Lead Acid Battery Expired/Used
ITEW3	PC Laptop Computers (CPU with input and output devices)	ITEW16	Answering systems			BOCCE4	Motors
ITEW4	PC Notebook Computers	BOCIT1	Cathode Ray Tubes (CRT)	CEEW2	Refrigerator	BOCCE5	Transformers, CVT
ITEW5	PC Notepad Computers	BOCIT2	Flat Panel Displays	CEEW3	Washing Machine	BOCCE6	Speakers, Inductors or Capacitor
ITEW6	Printers including cartridges	BOCIT3	Keyboards, Mouse	CEEW4	Air-conditioners excluding centralised air conditioning	BOCCE7	ALUMINIUM DIE SYSTEMS
ITEW7	Copying equipment	BOCIT4	Modem, Hub, Switch			BOCCE8	Washlet-IT
ITEW8	Electrical and electronic typewriters	BOCIT5	Mother Board	CEEW5	Fluorescent and other Mercury containing lamps, CFL, Tubelight	BOCCE9	LED Lights / Gadgets
ITEW9	User terminals and systems	BOCIT6	Memory Modules-SIMM/DIMM, Flash Drivers, Disk Drive			BOCCE10	Mobile Phone/Cell Phone/PDA
ITEW10	Facsimile		UPS, Inverter, Power Strips	BOCIT11	Flat Panel Monitor	BOCCE11	CDROM, Magnetic Tape
ITEW11	Telex	BOCIT7	Printer	BOCIT12	Cables, Power Chord, Wires	BOCCE12	Plastic E-Waste
ITEW12	Telephones	BOCIT8	Misc IT	BOCCE13		BOCCE13	SMPS/Power Supply Adapter/Power Supply Unit
ITEW13	Pay telephones			BOCCE14		BOCCE14	PCB - Printed Circuit Board - Crushed / Scrap / Cut/Damaged PCB
ITEW14	Cordless telephones			BOCCE15		BOCCE15	HW-Disposable E-Waste (Electrical & Electronic)

FORM 10
[See rule 19 (1)]

Occupier's Copy

75848

MANIFEST FOR HAZARDOUS AND OTHER WASTE S.No.:

1 Occupier's Name & Mailing Address (including Phone No. and email)	Rati Pushp Intermediates Pvt Ltd 8 th Km Jansath Road MZ NUP										
2 Sender's Authorization No.											
3 Manifest Document No.	D-000001 Dt 30/6/23										
4 Transporter's Name & Address (including Phone No. and email)	Party-self										
5 Type of Vehicle	(Truck / Tanker / Special Vehicle)										
6 Transporter's Registration											
7 Vehicle Registration No.	UP12 BT0924										
8 Receiver's Name & Mailing Address (including Phone No. and email)	(I) BHARAT OIL COMPANY (I) REG E-18, Site-IV, Sahibabad Industrial Area, Ghaziabad, UP-201010 Tel.: 0120-41679 e-mail:sales@bharatoil.com 										
(II) BHARAT OIL & WASTE MANAGEMENT LTD. Mauza Mukimpur, Roorkee-Lakshar Road, Roorkee - 247664 UK, Tel. :08874207664 e-mail:sales@bharatoil.com	(III) BHARAT OIL & WASTE MANAGEMENT LTD. Gata# 672 & 706 Cha, Sikandra Road, NH-2, Kumbhi Vill., Tehsil Akbarpur, Kanpur Dehat, UP, Tel : 0512-2285296 e-mail:sales@bharatoil.com										
9 Receiver's Authorization No.	(I) 174437/UPPCB/Ghaziabad(UPPCBRO)/CTO/Both/GHAZIABAD/2023 Valid upto: 31/12/2027										
(ii) UEPPCB/HO/Con-B-84/2018/548 Valid upto: 31/03/2023 Renewal Applied on dated 09-02-2023	(iii) 1403/UPPCB/KanpurDehat(UPPCBRO)/HWM/KANPUR DEHAT/2018 Valid upto 30/04/2023 Renewal Applied on dated 21-02-2023										
10 Waste Description	Polythene, used cloths, ETP Sludge										
11 Total Quantity No. of Containers	19 Kg 15 Kg m ³ or MT 155 Kg Nos.										
12 Physical Form	(Solid/Semi-Solid/Sludge/Oily/Tarry/Slurry/Liquid)										
13 Special Handling Instructions & Additional Information	Do not throw Drums from truck. In case of leakage/seepage, use Washing soap at point of leak to stop its leakage.										
14 SENDER'S CERTIFICATE	I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are categorised packed, marked, and labeled, and are in all respects in proper condition for transport by road according to applicable national government regulations.										
14 SENDER'S CERTIFICATE Typed Name & Stamp : <i>For Rati Pushp Intermediates (P) Ltd</i> (Auth. Sign.)	Signature :	<table border="1"> <tr> <td>Month</td> <td>Day</td> <td colspan="2">Year</td> </tr> <tr> <td>06</td> <td>30</td> <td>20</td> <td>23</td> </tr> </table>		Month	Day	Year		06	30	20	23
	Month	Day	Year								
06	30	20	23								
15 Transporter Acknowledgement of Receipt of Waste	Signature :	<table border="1"> <tr> <td>Month</td> <td>Day</td> <td colspan="2">Year</td> </tr> <tr> <td>06</td> <td>30</td> <td>20</td> <td>23</td> </tr> </table>		Month	Day	Year		06	30	20	23
Month	Day	Year									
06	30	20	23								
16 Receiver's Certificate for Receipt of Hazardous and other Waste	Signature :	<table border="1"> <tr> <td>Month</td> <td>Day</td> <td colspan="2">Year</td> </tr> <tr> <td>06</td> <td>30</td> <td>20</td> <td>23</td> </tr> </table>		Month	Day	Year		06	30	20	23
Month	Day	Year									
06	30	20	23								
Typed Name & Stamp :											



UTTAR PRADESH POLLUTION CONTROL BOARD

TC-12V, Vibhuti Khand, Gomti Nagar, Lucknow-226010

Phone:0522-2720828,2720831 Fax:0522-2720764 Email: info@uppcb.com Website: www.uppcb.com

Ref. No : 19212/UPPCB/MuzaffarNagar(UPPCBRO)/HWM/MUZAFFARNAGAR/2022

Dated :06/02/2023

To,

M/s RATI PUSHP INTERMEDIATES PVT LTD

8TH KM STONE, jansath road

Tehsil :MuzaffarNagar

District :MUZAFFARNAGAR

Sub :- Authorisation issued under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016

1. Number of authorization and date of issue 19212 and 06/02/2023 .
2. Reference of application (No. and date) 18961173 and 20/12/2022 .
3. Mr ABHISHEK GUPTA of M/s RATI PUSHP INTERMEDIATES PVT LTD is hereby granted an authorization based on the enclosed signed inspection report for generation, collection, utilization, storage and disposal or any other use of hazardous or other wastes or both on the premises situated at 8TH K.M. STONE, JANSATH ROAD MUZAFFARNAGAR .

Details of Authorisation

S No.	Category of Hazardous Waste as per the Schedules I,II and III of these rules	Authorised mode of disposal or recycling or utilization or co-processing, etc.	Quantity(ton/annum)
1	CATEGORY 5.1 AS PER SCHEDULE I	THROUGH TSDF	0.05 KL/ANNUM
2	CATEGORY 33.2 AS PER SCHEDULE I	THROUGH TSDF	0.2 MT/ANNUM
3	CATEGORY 34.2 AS PER SCHEDULE I	THROUGH TSDF	0.50 MT/ANNUM

1. The authorization shall be valid for a period of 05/02/2028 from the date of issue of this letter .
2. The authorization is subject to the following general and specific conditions (please specify any conditions that need to be imposed over and above general conditions, if any) .

A General Conditions of Authorization -

1. The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under .
2. The authorisation or its renewal shall be produced for inspection at the request of an officer authorised by the State Pollution Board .
3. The person authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization .
4. Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorisation .

GHAN SHYAM Digitally signed by GHAN SHYAM
Date: 2023.04.19 22:01:16 +05'30'

5. The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time .
6. The person authorised shall comply with the provisions outlined in the Central Pollution Control Board guidelines on Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and penalty .
7. It is the duty of the authorised person to take prior permission of the State Pollution Control Board to close down the facility .
8. The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation .
9. The record of consumption and fate of the imported hazardous and other wastes shall be maintained .
10. The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilisation of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorisation .
11. The importer or exporter shall bear the cost of Import or export and mitigation of damages if any
12. An application for the renewal of an authorisation shall be made as laid down under these Rules .
13. Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Changes or Central Pollution Control Board from time to time .
14. Annual return shall be filed by June 30th for the period ensuring 31st March of the year .
15. The Unit will file the renewal application at least 2 months prior to the expiry of this Order.

B Specific Conditions of Authorization

1- The unit will submit the proof of depositing the requisite processing fees of application in a month otherwise this authorization will stand automatically cancelled.

2- The wastes must be safely collected in leak proof containers and shall be duly marked in a manner suitable for handling, storage and transport and the packaging shall be easily visible and be able to withstand physical conditions and climatic factors. All hazardous waste containers/bags shall be provided with a general label as given in Form 8. The storage area should be at an isolated spot in the premises and must be fenced, covered and duly marked.

3- The authorized person/agency shall ensure that no adverse impact on the air, soil and water including groundwater takes place due to activities for which authorization has been requested.

4- Comprehensive safety measures must be followed in handling of wastes and the staff must be properly trained.

5- It is brought to your notice that as per the order dated 14.11.2003 passed by the Hon'ble Supreme Court in W.P. (c) 657 of 1995, no industry covered under Hazardous Waste (Management and Handling) Rules, 1989 (as amended) shall be allowed to operate without valid authorisation. It is also provided in the same order that industries which are not complying with the conditions shall not be allowed to operate. Hence in case you fail to apply for authorisation before its expiry or fails to comply with conditions of the earlier authorisation issued to you, closure order shall be issued

against your industry without any further notice.

6- The applicant must file returns on prescribed Form 4 along with a compliance report of this letter. You should also maintain records on Form-3 and present it to Board's inspecting officials.

7- In case of occurrence of an accident, complete details on Form-11 must be sent to U.P. Pollution Control Board at the earliest along with details of mitigative and remedial measures taken.

8- It is also the mandatory duty of the occupier of industry as well as operator of a facility to develop suitable waste treatment and disposal facility and the design of the facility must be approved by the Board. Details along with the project report must be sent in this regard within fifteen days of receipt of this letter, otherwise the industry shall become member of a common TSDF and the industry shall start sending the Hazardous waste already stored along with the Hazardous waste generated at present at this TSDF. The proof of valid membership of TSDF along with proof of disposal of hazardous waste to TSDF shall be sent to U.P. Pollution Control Board within three months.

9- The authorised person shall not receive, collect, or store any hazardous waste from any unauthorised occupier or generator of hazardous wastes. In case any hazardous wastes is sold to any other reprocessing unit it must be ensured that such unit is fully complying with environmental requirements and has a valid authorisation of the Board.

10- In no case any hazardous wastes shall be disposed off on land, in any drain or stream. All spillages of hazardous chemicals, used containers of hazardous chemicals such as flammable, corrosive, explosive and toxic nature must be safely collected and stored. Non-compatible wastes must be suitably and safely handled.

11- Proposal regarding waste minimization and reuse of wastes must be sent. Details of any recovery/ reuse system must be sent within two months.

12- It is within the powers and functions of the U.P. Pollution Control Board to suspend/ cancel the authorization issued under the Rule- 6(2) of The Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

13- The stored waste shall not be taken out of the storage area except with the written permission of the State Pollution Control Board in this regard.

14- You are directed to display online data outside the main factory gate with regards to quantity and nature of hazardous chemicals being handled in the plant including waste water and air emissions and solid hazardous waste generated within the factory premises. Necessary compliance should be sent within fifteen days of receipt of this letter.

15- It is the mandatory duty of the authorised person to comply with the guideline for transportation of hazardous waste in accordance with Rule 18 of The Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Guidelines in this regard have been issued by Central Pollution Control Board from time to time.

16- You are directed to provide the complete details regarding the quantity of hazardous waste stored in the factory premises within a month.

17- You are directed to provide all hazardous waste generated in the factory to any TSDF operating in the state for the treatment and disposal and send the compliance report to the U.P. Pollution Control Board at the earliest.

18- Status report of hazardous waste stored in premises available storage capacity and future action plan for permanent safe disposal of hazardous waste shall be submitted within one month.

19- Ground water monitoring report of premises shall be submitted within one month.

20- Industry will follow the various provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

21- The authorised actual user of hazardous and other wastes shall maintain records of hazardous and other wastes purchased in a passbook issued by the State Pollution Control Board along with the authorisation.

(Authorized Signatory)

GHAN SHYAM Digitally signed by GHAN SHYAM
Date: 2023.04.19 22:02:28 +05'30'

UTTAR PRADESH POLLUTION CONTROL BOARD

Copy to: To the Regional Officer, U.P.Pollution Control Board, MuzaffarNagar to ensure the compliance of the conditions imposed in the certificate. for information and necessary action .

GHAN SHYAM Digitally signed by GHAN SHYAM
Date: 2023.04.19 22:02:54 +05'30'
CEO/EE, I/C Circle _____

EXHIBIT-XIV



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, ISO 14001 : 2015 & ISO 45001 : 2018 Certified & MoEFCC Recognised Laboratory)

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064, Ph. : 011-28115459, 41848475, 9654958120

E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web. : www.skaslab.com

GOVT. APPROVED TESTING LABORATORY

REPORT OF ANALYSIS

Issued To	RATI PUSHP INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001	Report No.	ENV-180523001
Sample Nature/Name	STACK EMISSION	Date of Sample Received	18/05/2023
Sample Code	ST-01	Test Started On	18/05/2023
Customer Ref. No.	Nil	Test Completed on	23/05/2023
		Date of Report Issued	23/05/2023

Sampling Details:

Sample Drawn By : Mr. Kuldeep
Date of Sampling : 17/05/2023
Sampling Plan & Method : SKAS-SOP-ENV-003
Instrument Used for Monitoring : Stack monitoring Kit
Instrument ID : EI-106/45
Instrument Calibration Date : 28-06-2022
Instrument Calibration Due Date : 27-06-2023

Official Detail

Plant/Section : Boiler Section
Stack identification : Stack attached with Boiler Set (Equipped with ID Fan & Cyclone Separator)
Source of Emission : Boiler
Quantity of Fuel used : 250 kg/8 Hrs (Agrobased Briquettes & wood)
Boiler S.No. : CB-2342 (Make: - Cheema, PB)
Product Manufacturing : NA
Emission Control (if any) : Cyclone Separator

Technical Detail

Capacity : 750 Kg
Diameter of stack : 300 mm
Stack Height above the ground level : 23 mtr
Stack Height above the sampling port : 8 mtr
Type of fuel used : Agrobased Briquettes & wood
Normal operating schedule : As per Requirement
Duration of Monitoring (Minutes) : 30

Observations at Site

Ambient Temperature (°C) : 40
Stack Temperature (°C) : 160
Velocity (m/s) : 17.4
Quantity of Emission (Nm³/hr.)- (Volumetric flow rate): 3045.73

TEST RESULT

S. No.	Parameter	Results	Units	Requirements as per EPA	Test Methods
1.	Particulate Matter (as PM)	49.1	mg/Nm ³	150	IS: 11255 (Part-1)
2.	Oxide of Nitrogen (NO ₂)	12.5	mg/Nm ³	NA	IS: 11255 (Part-7)
3.	Carbon Monoxide (as CO)	0.008	% by volume	1	IS: 13270-b-1992
4.	Sulphur Dioxide (as SO ₂)	6.2	mg/Nm ³	NA	IS: 11255 (Part-2)

Remarks: Note: - Party asked for the above tests only.

*** End of Report ***



Authorized Signatory

VINAY KUMAR

- The results listed refer only to tested samples and applicable parameters. Endorsement of product is neither inferred nor implied.
- Test Certificate in full or parts shall not be used for Promotional or Publicity Purposes & cannot be used as an evidence in the court of law.
- Test Certificate in full or parts shall not be reproduced, without permission of director.
- Sample will be destroyed after one month from the date of issue of test certificate unless otherwise specified.
- Total Liability of our Analytical Division is limited to the invoiced amount.
- Sample fee not return for us unless other wise stated.



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, ISO 14001 : 2015 & ISO 45001 : 2018 Certified & MoEFCC Recognised Laboratory)

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064, Ph. : 011-28115459, 41848475, 9654958120
E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web. : www.skaslab.com

GOVT. APPROVED TESTING LABORATORY

REPORT OF ANALYSIS

Issued To	RATI PUSH P INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001 UP	Report No	ENV-051023130
		Date of sample Received	05/10/2023
Nature of the Sample	AMBIENT AIR QUALITY	Test Started On	05/10/2023
Sample Code	AAQ-01	Test Completed on	10/10/2023
Customer Ref. No	Nil	Date of Report issued	10/10/2023

Sampling Details:

Sampling done By	: Mr. Kuldeep
Date of Monitoring and Time	: 04/10/2023 to 05/10/2023, (12:10 Pm to 12:10 Pm)
Sampling Location	: Project Site
Sampling Co-Ordinates	: NA
Sampling Plan & Method	: SKAS-SOP-ENV-003
Average Temperature (°C)	: 28
Humidity (%)	: 62
Wind Direction	: W
Wind Speed (km/h)	: 6.7
Environmental Conditions	: Clear Sky

Test Result

S.No.	Test Parameters	Units	Results	Requirement permissible limits AS PER NAAQS/CPCB	Method
1	Particulate Matter (PM 2.5)	µg/m ³	52.6	60	NAAQMS Monitoring & Analysis Guidelines, Volume-I CPCB, Gravimetric method
2	Particulate Matter (PM 10)	µg/m ³	91.7	100	IS: 5182 (P-23)
3	Carbon Monoxide (as CO)	mg/m ³	BDL(MDL-1)	4	IS: 5182 (P-10)
4	Sulphur Dioxide (as SO ₂)	µg/m ³	9.2	80	IS: 5182 (P-2)
5	Nitrogen Dioxide (as NO ₂)	µg/m ³	24.9	80	IS: 5182 (P-6)

Remarks : Note :- Party asked for the above tests only.

End of Report



Analyst

Authorized Signatory

1. The results listed refer only to tested samples and applicable parameters. Endorsement of product is neither inferred nor implied.
2. Test Certificate in full or parts shall not be used for Promotional or Publicity Purposes & cannot be used as an evidence in the court of law.
3. Test Certificate in full or parts shall not be reproduced, without permission of director.
4. Sample will be destroyed after one month from the date of issue of test certificate unless otherwise specified.
5. Total Liability of our Analytical Division is Limited to the invoiced amount.
6. Sample (s) not drawn by us unless other wise stated.
7. Results given in report are related to sample Tested.

EXHIBIT-XV



Rati Pushp Intermediates Pvt. Ltd.

8th KM Jansath Road Muzaffarnagar UP-251001

Environmental Data Display Board

- 1) Date of Information update : 20/04/2023
- 2) Name of company : RATI PUSHP INTERMEDIATES PVT. LTD.
- 3) Contact person : Abhishek Gupta
- 4) Designation : Managing Director
- 5) Consent (CTO) under Air Act & Water Act : Issued on 27-12-2022 - Valid upto 31-12-2027
- 6) Authorization for Haz & Other Waste (UPPCB) : Issued on 06-02-2023 - Valid upto 05-02-2028

7) Parameters Of Air Exission (a) details of equipments :

(a) Details of Equipments

Capacity of Equipment	Capacity	Fuel Type	Stack Height	Fuel Consumption
Steam Boiler	250 KG	Diesel	10 M	40-50 Ltr/Day
D.G. set	63 KVA	Diesel	10 M	8 Ltr/Hr. (As per Running Hours)
Steam Bioler	750 KG/Hr	Agrobased Briquettes Wood	23 M	250 Kg/DayApprox (As per Running Hours.)

(b) Quality Of Air Emission :

Sr. No	Parameters	Result	Unit
1)	Particulate matter (PH)	49.1	Mg/NH ₃
2)	Oxide of Nitrogen (NO _x)	12.5	Mg/NH ₃
3)	Sulphur Dioxide (SO ₂)	6.2	Mg/NH ₃
4)	Carbon Monoxide (CO)	0.008%	% by Volume

(8) parameters of treated effluent:

Sr. No	Parameters	Result	Unit
1)	PH	7.18	-
2)	Total Suspended (TSS)	39.5	Mg/L
3)	Oil & Grease	2.7	Mg/L
4)	BOD	24.1	Mg/L
5)	COD	176.0	Mg/L

9) Parameters Of Noise Level Monitoring:

D.G. Set- 62.5 kVA (Silent Canopy Type) (Jakson Make- CPCB Approved)			
Sr. No	Parameters	Result	Unit
1)	Noise Level When Canopy Door Is Open	97.7	dB (A)
2)	Noise Level When Canopy Door Is Closed At A Distance Of 1 Meter	71.1	dB(A)
3)	Insertion Loss	25.6	dB(A)

10) Details Of Disposal Of Hazardous & Non Hazardous Waste :

S.No	Type of wate	Category of Waste	Qty (Kg)	Disposal Against Form	Final disposal Facility
1.	Used Clothes, Mouth Mask, Caps, Gloves	Hazardous	5.400	form- 10	Bharat Oil & Waste Management Lt, Sahibabad Membership No- BOWML/K/3868/20
2.	Used Polythene contaminated/Packaging Material	Hazardous	29.800	S.No. - 73167 dated- 30/03/23	
3.	ETP Sludge	Hazardous	132.350		
4.	Used Paper	Non-Hazardous	27.000		
5.	Electric Waste	Non-Hazardous	3.100	form- 6 S.No. - 8524 dated- 30/03/23	

EXHIBIT-XVI



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

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E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web. : www.skaslab.com

GOVT. APPROVED TESTING LABORATORY

REPORT OF ANALYSIS

Issued To	RATI PUSHUP INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001 UP	Report No	ENV-180523003
		Date of sample Received	18/05/2023
Nature of the Sample	ETP TREATED WATER	Test Started On	18/05/2023
Sample Code	NA	Test Completed on	23/05/2023
Customer Ref. No	Nil	Date of Report Issued	23/05/2023

SAMPLING & ANALYSIS DATA

Sample Drawn By : Mr. Kuldeep
Date Of Sampling : 17/05/2023
Sampling Location : ETP Plant
Sampling Co-Ordinates : NA
Sample Quantity : 2 Ltr + 500 ml
Sample packing Details : Plastic Bottle & Glass Bottle
Sampling Method : IS: 17614 (P-3)
Environmental Conditions : Normal

TEST RESULTS

S.No.	Test Parameters	Units	Results	Limits	Method
1	pH	-	7.18	5.5 to 9.0	IS : 3025 (P-11)
2	Total Suspended Solids (as TSS)	mg/l	39.5	100	IS : 3025 (P-17)
3	Oil & Grease	mg/l	2.7	10	IS : 3025 (P-39)
4	Biochemical Oxygen Demand(for 3 days at 27 °C) (as BOD)	mg/l	24.1	30	IS : 3025 (P-44)
5	Chemical Oxygen Demand (as COD)	mg/l	176.0	250	IS : 3025 (P-58)

Remarks : Note :- Party asked for the above tests only.

End of Report


Analyst




Authorized Signatory

VINAY KUMAR

EXHIBIT-XVII

EXHIBIT-XVIII



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF ACTIVE PHARMACEUTICAL INGREDIENTS (API'S) & INTERMEDIATES

Works: 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P.) INDIA • Mobile : 9837473348
Postal Add : Ramji sadan, 494-95, Kambalwala Bagh, New Mandi
Muzaffarnagar-251001 (U.P.) INDIA
E-Mail : ratipushp@yahoo.com • Website : www.ratipushp.com

ENVIRONMENTAL POLICY

We are committed to Integrate Environmental Management System (EMS) practices in our various processes by:

- Continually improving the environmental management system to enhance environmental performance.
- Continually improving on our EMS performance by active participation of all our employees.
- Complying with all applicable legal and other requirements.
- Commitment to set environmental objectives and achieve them.
- Commitment for prevention of pollution due to our product, manufacturing of our products and also due to the context to our organization.
- Imparting training and awareness to all our employees.
- Communication to all persons who are working on our behalf of the organization, interested parties and all our employees.

Date : 26.06.2023
Place : Muzaffarnagar


Abhishek Gupta
(Managing Director)



EXHIBIT-XIX



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, ISO 14001 : 2015 & ISO 45001 : 2018 Certified & MoEFCC Recognised Laboratory)
A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064, Ph. : 011-28115459, 41848475, 9654958120
E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web. : www.skaslab.com

GOVT. APPROVED TESTING LABORATORY

REPORT OF ANALYSIS

Issued To	RATI PUSHUP INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001 UP	Report No	ENV-180523002
Nature of the Sample	DG NOISE	Date of sample Received	18/05/2023
Sample Code	NA	Test Started On	18/05/2023
Customer Ref. No	Nil	Test Completed on	23/05/2023
		Date of Report Issued	23/05/2023

SAMPLING & ANALYSIS DATA:

Sample Drawn By : Mr. Kuldeep
Date of Sampling : 17/05/2023
Sampling Location : DG Area
Sampling Co-Ordinates : NA
Capacity : 62.5 KVA
Environmental Conditions : Normal

Test Result


S.No.	Test Parameters	Units	Results	Requirements As per EPA	Test Method
1	Noise Level When Canopy Door is Open	dB (A)	97.7	-	IS: 9876-1981
2	Noise Level When Canopy Door is Closed at distance of 1 meter	dB (A)	71.1	Maximum 75	IS: 9876-1981
3	Insertion loss	dB (A)	25.6	Minimum 25	IS: 9876-1981

Remarks : Note :- Party asked for the above tests only.

End of Report


Analyst




Authorized Signatory
VINAY KUMAR

1. The results listed refer only to tested samples and applicable parameters. Encasement of product is neither inferred nor implied.
2. Test Certificate in full or parts shall not be used for Promotional or Publicity Purposes & cannot be used as an evidence in the court of law.
3. Test Certificate in full or parts shall not be reproduced, without permission of director.
4. Sample will be destroyed after one month from the date of issue of test certificate unless otherwise specified.
5. Total Liability of our Analytical Division is Limited to the invoiced amount.
6. Sample (s) not drawn by us unless otherwise stated.



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, ISO 14001 : 2015 & ISO 45001 : 2018 Certified & MoEFCC Recognised Laboratory)

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110064, Ph. : 011-28115459, 41848475, 9654958120
E-mail : shreekrishnalab@gmail.com, info@skaslab.com, Web. : www.skaslab.com

GOVT. APPROVED TESTING LABORATORY

REPORT OF ANALYSIS

Issued To	RATI PUSHP INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001	Report No.	ENV-051023131
		Date of Sample Received	05/10/2023
Sample Nature/Name	AMBIENT NOISE	Date of Report Issued	10/10/2023
Sample Code	ANQ-01		
Customer Ref. No.	Nil		

MONITORING DETAILS

Monitoring Done by : Mr. Kuldeep
Date of Monitoring & Time : 04/10/2023 to 05/10/2023 (11:10 am to 11:10 am)
Sampling Location : Project site
Sampling plan & Method : SKAS-SOP-ENV-004
Environment Condition : Clear Sky

TEST RESULTS

S.No	Test Parameters	Unit	Result	Requirements As per EPA	Test Method
1	Equivalent Noise Level, Leq (Day)	dB(A)	62.5	75	IS: 9989:1981
2	Equivalent Noise Level, Leq (Night)	dB(A)	48.9	70	IS: 9989:1981

Note: - Day Time means from 6.00 a.m. to 10.00 pm.
Night Time means from 10.00 p.m. to 6.00 am.

Remarks: Note: - Party asked for the above tests only.

*** End of Report ***

Analyst

Authorized Signatory

EXHIBIT-XX



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF ACTIVE PHARMACEUTICAL INGREDIENTS(API'S)&INTERMEDIATES

Works: 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P.) INDIA • Mobile : 9837473348
Postal Add : Ramji sadan, 494-95, Kambalwala Bagh, New Mandi
Muzaffarnagar-251001 (U.P.) INDIA
E-Mail : ratipushp@yahoo.com • Website : www.ratipushp.com

Date-26/06/2023

Certified true copy of the resolution passed in the meeting of the Board of Directors of the company held on 26/06/2023.

"Resolved" that Mr. **Abhishek Gupta**, Managing Director is hereby authorized for Implementation of Environmental policy which is enclosed with this resolution for M/S Rati Pushp Intermediates Pvt. Ltd. Muzaffarnagar U.P.

"Resolved" further that Mr. **Abhishek Gupta** will look after all day activities as mentioned above as an authorized Person.

Shubham Gupta

Shubham Gupta
(Director)

Anmol Gupta

Anmol Gupta
(Director)

Abhishek Gupta

Abhishek Gupta
(Managing Director)



Enclosures : Environmental policy of Rati Pushp Intermediates Pvt. Ltd.



Rati Pushp Intermediates Pvt. Ltd.

MANUFACTURERS OF ACTIVE PHARMACEUTICAL INGREDIENTS (API'S) & INTERMEDIATES

Works: 8th Km. Stone, Near Rana Papers, Jansath Road,
Muzaffarnagar-251001 (U.P.) INDIA • Mobile : 9837473348
Postal Add : Ramji sedan, 494-95, Kambalwala Bagh, New Mandi
Muzaffarnagar-251001 (U.P.) INDIA
E-Mail : ratipushp@yahoo.com • Website : www.ratipushp.com

ENVIRONMENTAL POLICY

We are committed to Integrate Environmental Management System (EMS) practices in our various processes by:

- Continually improving the environmental management system to enhance environmental performance.
- Continually improving on our EMS performance by active participation of all our employees.
- Complying with all applicable legal and other requirements.
- Commitment to sat environmental objectives and achieve them.
- Commitment for prevention of pollution due to our product, manufacturing of our products and also due to the context to our organization.
- Imparting training and awareness to all our employees.
- Communication to all persons who are working on our behalf of the organization, interested parties and all our employees.

Date : 26.06.2023
Place : Muzaffarnagar


Abhishek Gupta
(Managing Director)



EXHIBIT-XXI

DISASTER MANAGEMENT PLAN

In order to be in a state of readiness to face adverse effects of accidents caused by hazardous substances, a Disaster Management Plan (DMP) is prepared which includes on-site and off-site emergency plan by the individual industry as required under the Acts and Rules (Manual on Emergency Preparedness for chemical hazards, MoEF New Delhi).

The key elements of a DMP are as follows:

1. Basis of the plan
2. Accident prevention procedure / measure
3. Accident / emergency response procedure / measure; and
4. Recovery procedure

1. Basis of the Plan

- a. Identification and assessment of hazards is crucial for on-site emergency planning and requires systematically identifying what emergencies could arise in the plant. Hazard analysis or the consequence analysis (in case of catastrophic release of hazardous chemicals) is, therefore, considered as the basis of DMP.
- b. Explosion with little or no warning; hazards from blast wave, flying debris and high levels of thermal radiation (Vapour Cloud Explosion).
- c. Events involving hazardous materials.
- d. Slow or intermittent release of hazardous substances, e.g. from a leaking valve, rapid release for limited duration; due to plant failure, e.g. fracture of pipe; hazards from toxic cloud, limited in size, which may quickly disperse.
- e. It is necessary to visualize the consequences of the release of hazardous substance for the events mentioned above and the likely damage caused to the areas in and around the facility. Risk mitigation measures based on consequence analysis also form an integral part of an organized Disaster Management Plan:

2. Accidents Preventions Procedures/ Measures

Most of the accidents can arise due to fire and toxic release:

- a. Major fires with no danger of explosion. Hazards from prolonged high levels of thermal radiation & smoke.
- b. Fire threatening plant/storage containing hazardous substances; hazards from spread of fire, explosion or release of hazardous substances.
- c. Explosion with little or no warning, hazards from blast wave, flying debris and high levels of thermal radiation.

• *Fire Prevention Planning and Measures*

Fire is one of the major hazards that can result in disaster. Following are the important measures that require planning in the initial stage of project.

- a. Water supply
- b. Permanent fire hydrant and monitor nozzle installation

- c. Permanent foam system
- d. Permanent water fog and sprinkler system
- e. Permanent fire smothering system
- f. Mobile Fire fighting equipment
- g. First aid appliances
- h. In addition to the foregoing physical equipment for fire fighting, arrangements for fire protection in plant should include proper organization and training of workers.

- ***Fire Water Storage***

Own sources of water supply and storage facility for fire protection is recommended for the facility. The amount of water flow rate to be made available for fire fighting varies with individual hazardous conditions. The water flow rate should be adequate enough for cooling a burning tank and also adjacent tanks.

Total demand on the fire water system should also consider the water requirement for spray system for each tank. Hydrants are also desirable on the roadways and around the periphery of the tank farm. The tanks for firewater storage should be religiously reserved for this service only.

- ***Foam System***

Foam as employed for fire extinguishing is a dispersion of minute bubble within tough films of a water solution containing materials which stabilize its foam making properties. The bubbles may be filled with either carbon dioxide or air.

The action of foam in fire extinguishing is primarily one of blanketing or smothering the flame. It is light and will flow upon the surface of liquids, and thereby furnishes the most practical effective means of fire extinguishing in large liquid reservoirs such as tanks.

3. Accident/Emergency Response Planning Procedure

- a. To deal with an emergency, the arrangement for immediate deployment or appointment of key personnel with their specific duties should be clearly described and mentioned.
- b. The emergency planning includes anticipatory action for emergency, maintenance and streamlining of emergency preparedness and ability for sudden mobilization of all forces to meet any calamity. Communication links that can be established with local such as factory inspectorate, police station, fire brigade, hospital etc., State and Central authorities to meet the challenges of emergencies and ensure reliability of functions of communication system. Adequacy and efficiency of fire fighting and fire detection equipment, personal protective appliances, medical services and safety and emergency training is to be ensured.
- c. An in-plant road map showing linkage with different units, gates and emergency gates should be prepared. The plant management should display the chemical properties and antidotes of materials stored and handled and their locations and inventory. The management should also maintain data on weather conditions of each season of plant area (temperature, wind speed, wind direction), for reference during emergency for evacuation purposes.

- ***Communication***

- a. An essential component of a DMP in the Communication links necessary for gathering information needed for overall co-ordination. Emergency Control Centre links with incident scene and with in-house as well as outside emergency services. Too much reliance on the Telephone system is risky as it can soon be overloaded in an emergency situation. Radio links with a special emergency wave length failing which at least hot line between the Emergency Control Centre, various critical services (fire-fighting, control rooms, medical services etc.)

and hazardous locations need to be considered. A multi-user wireless paging system with selective call facility is also useful for promptly locating key operating personnel in the plant, both during normal times and during emergencies. A public address (PA) system with loud speakers installed at vital installations or corners or on jeeps can be extremely useful for guiding plant (on-site) personnel to some safe locations within the plant during emergencies. The details of the communication arrangements should include having a direct line to the fire brigade. A periodic check of this system is recommended.

- b. The description of the tasks and responsibilities, reporting place, etc. for each key functionary should be, as far as possible, so drafted as to reduce the communication needs between the interacting groups.

- ***Emergency Control Centre***

As mentioned earlier, the establishment of “EMERGENCY CONTROL CENTRE” at each unit to co-ordinate emergency response activities within a relevant area is essential.

- a. The emergency control centre should be sited in an area of minimum risk and should have easy and fast access to all major hazardous installations. It is undesirable to have alternative control centres unless it is anticipated that the control centre is likely to be affected by heat load/toxic cloud or other hazards and hence an alternative.
- b. Emergency control centres (including the alternative one) should be equipped with the following:
- c. Adequate number of external telephones. If possible, one should accept incoming calls only, in order to bypass jammed switchboards during an emergency.
- d. An adequate number of internal telephones.
- e. A plan of the works showing:
- f. Areas where there are large inventories of hazardous materials.
- g. Sources of safety equipment.
- h. Fire-fighting system and additional sources of water.
- i. Site entrance and roadways, including up-to-date information on road works.
- j. Location of the works in relation to the surrounding community.
- k. A nominal roll of employees.
- l. A list of KEY PERSONNEL with addresses, telephone numbers, etc.
- m. An adequate number of personal protective/safety equipment in case of hampering of smooth rescue operations.

4. Recovery Procedure

- a. It is extremely difficult to formulate recovery procedure by other organizations. Therefore, the contents of this section are indicative for the formulation of detailed recovery procedure.
- b. The duration of recovery phase will depend upon the extent of damage caused due to disaster and the interventions initiated, thereafter. The management could restore normalcy only when speedy actions on the earlier phases are initiated. Some of the issues to be included in recovery phase are:
- c. Treatment of patients after the disaster due to psychological breakdown (operators/resident around facility).

- ***Psychological Breakdown***

- a. It has been the experience that some of the workers cannot sustain trauma due to disaster. Psychological disorder of these operators/residents is a common scene. Should the situation arise, the project management should immediately arrange for the assistance from professionals.

- ***Disaster Management Plan: On-Site Crisis***

- a. Identification of Personnel and Assessment of Responsibilities on specific functions of Co-ordinating Authority. In order to combat the emergencies, an organisational chart for on-site emergency should be periodically reviewed and updated.

- ***Emergency Preparedness Programme: Off-Site***

- a. An unexpected emergency could cause serious damage to people, livestock and property in the area. This naturally calls for the necessity for evolving an OFF-SITE emergency preparedness programme so as to combat any such possible eventuality.
- a. Many agencies are involved in combating an emergency. These include Government Departments like Public Health, Fire Services, Police, Civil Defense, Medical Services, and other voluntary organisations. The Offsite Emergency Programme (or Plan) should aim at reducing the probability and severity of the sufferings of the people and the damage to property by clearly identifying the role of each of the agencies involved in combating an emergency.

- ***Scope of the Off-Site Plan***

The scope of the OFF-SITE plan is to:

- a. Protect the inhabitation around the Hazardous Areas and evacuating them, if necessary
- b. Ensure their subsistence during the stay in camp
- c. To protect and safeguard the property and belongings of the evacuated sections of the population until their return
- d. To take adequate measures for their rehabilitation.

- ***Emergency Information System***

The first person, who observes/ identifies the incident, shall inform it as per emergency reporting system.

- ***Evaluation of Functioning of Disaster Management Plan***

- a. Emergency Preparedness, among employees of different responsibilities & levels shall be monitored through Mock Drill / Fire Drill / Emergency Evacuation Drill / Functioning of emergency reporting system, not least than once in a calendar year; to check the effectiveness of the documented Plan in the break of an actual Emergency situation.
- b. Two Senior Personnel shall be designated as the observer, who will observe the effectiveness of the plan in case of an emergency situation. They will not be assigned any other responsibility in the break out of an emergency.
- c. Feedback will be taken, and the training on Emergency Preparedness / Disaster Management Plan will be provided accordingly. As per the feedback the EPAP will also be updated.

- d. Emergency Siren Tone
- e. Emergency siren to be operated by security person.
- f. On hearing emergency siren.
- g. Non-essential personnel shall follow safe route for evacuation. Non-essential persons will not rush towards incident site.
- h. Key/Essential Personnel shall report to respective control room.

- ***Emergency Siren Tone***

- a. FIRE : Whaling sound for two minutes
- b. ALL CLEAR : Continuous sound for three minutes

- ***Post Emergency Recovery***

- a. The post-emergency procedures discussed below are designed to successfully manage the damages/losses of an emergency event. The focus of these procedures is to move the plant back into normal operating mode as quickly and efficiently as possible.

- ***Accident Investigation***

The following guidelines will be followed to carry out accident investigation:

- a. As soon as possible after the emergency is over and plant operation has become normal, the investigation will be carried out to determine the cause of the event.
- b. Representatives from various disciplines will be members of the investigating team.
- c. The area of the event will be sealed off so that tampering or alteration of the physical evidence will not occur.
- d. Key components will be photographed and logged with time, place, direction, etc.
- e. Statements will be taken from those who were involved with the operation or who witnessed the event.

- ***Damage Assessment***

- a. This phase of recovery establishes the quantum of replacement machinery considered necessary for bringing back the plant to normal operation, property and personnel losses, and culminates in a list of necessary repair, replacement and reconstruction work. Insurance companies will be informed of the damage and requested to pay the compensation as per claim.

- ***Cleanup and Restoration***

This phase will only begin after the investigation is complete and will involve the following:

- a. Reporting documentation will be prepared and forwarded to appropriate authorities.
- b. Repairs, restoration and cleanup will begin.
- c. Insurance claims will be prepared and submitted

RISK MITIGATION MEASURES

Risk Assessment provides a quantitative technique for assessing the significance of the impact of any facility on its external environment, a means for highlighting key areas for greater attention and a tool for comparing alternative options, though it is no substitute for close attention to the fundamentals of safety throughout the design process or for design reviews.

For risk reduction, attempts should be made to either reduce inventories that could get released in the event of loss of containment or failure likelihoods or both as feasible. QRA identifies the dominant risk contributors, which enables prioritization of plants/section that deserve special attention in terms of inspection and maintenance in particular and over all safety management as a whole.

Mitigation Measures

Various risk mitigation measures for proposed Manufacturing and Technical services facilities are as given below:

1. The Safety Management Systems (SMS) should be introduced and followed.
2. Detailed risk assessment study should be carried out on final design and operating parameters for various components of RP Intermediates facilities.
3. Safety manual for storage and handling of hazardous chemicals should be prepared.
4. Personnel engaged in handling of hazardous chemicals should be trained to respond in an unlikely event of emergencies.
5. A written process safety information document should be compiled for general use and summary of it should be circulated to concerned personnel.
6. The document compilation should include an assessment of the hazards presented including (i) toxicity information, (ii) permissible exposure limits, (iii) physical data, (iv) thermal and chemical stability data, (v) reactivity data, (vi) corrosivity data, (vii) safe procedures in process.
7. Predictive and preventive maintenance schedules should be prepared for equipment, piping, etc. and thickness survey should be done periodically as per standard practices.
8. Safe work practices should be developed to provide for the control of hazards during operation and maintenance such as (i) tag out, (ii) confined space entry, (iii) opening process equipment or piping, (iv) control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel.
9. In the material storage area, hazardous materials should be stored based on their compatibility characteristics.
10. Near miss and accident reporting system should be followed and corrective measures should be taken to avoid / minimize near miss incidents.
11. Safety measures in the form of DO and Don't Do should be displayed at strategic locations especially in local language and English.
12. Safety audits should be conducted regularly.
13. Electrical earthing pit should be checked regularly.
14. Water sprinkler system should be provided in flammable gas storage area and it must be checked regularly.
15. Fire fighting system should be tested periodically for proper functioning.
16. All hydrants, monitors and valves should be visually inspected every month.

17. Smoke and heat detectors should be provided and these should be tested and calibrated as per schedule.
18. Adequate earthing and bonding should be provided to tanks, vessels and machineries and structures, electrical motors and other facilities.
19. Flame-proof electrical fitting should be provided in flammable gas and liquids areas, HSD/FO storage area.
20. Only authorised persons should be allowed to enter inside the flammable storage and other hazardous chemical storage area.
21. Adequate lighting in the work place should be provided with due flame proof lighting (FLP) fitting wherever required.
22. "NO SMOKING" should be declared in the entire premises.
23. It must be ensured that all safety devices provided in the plant are in good condition.
24. Disaster Management Plan should be prepared and available with concerned personnel department.

Handling of Hazards

The mitigation measures need to be considered during the handling of hazards are as follows:

1. Personal protective equipment used by the person during handling of hazardous chemicals, should be periodically replaced.
2. If any spillage of hazardous chemicals, it should be cleaned and disposed as per standard practiced and procedure described in MSDS.
3. Empty drums/bags of hazardous chemicals should be neutralized immediately.
4. Personnel engaged in handling of hazardous chemicals should be made aware of properties of hazardous chemicals.

General Working Conditions

1. House Keeping

- a. All the passages, floors and stairways should be maintained in good condition. The system should be available to deal with any spillage of dry or liquid chemical at the premises.
- b. Walkways should be clearly marked and free from obstructions.
- c. Precaution and instructions should be displayed at strategic locations in local language and in English language.
- d. All pits, sumps should be properly covered or securely fenced.

2. Ventilation

- a. Adequate ventilation should be provided in the work floor environment and storage of hazardous materials.
- b. The work environment should be assessed and monitored regularly.

3. Safe Operating Procedures

- a. Safe operating procedures should be available for storage and handling of Hazardous chemicals.
- b. The personnel should be informed of the consequences of failure to observe the safe operating procedures.

4. *Work Permit System*

- a. Work permit system should be followed at proposed plant facilities. Hazardous work permit should be used for hot work, electrical works, confined space entry, etc.

5. *Emergency Preparedness*

- a. On-site emergency plan should be prepared and readily available for an unlikely event of emergency.
- b. Emergency telephone numbers should be available and displayed properly at strategic locations.

6. *Material Handling*

- a. Material handling areas should be clearly defined.
- b. The personal should be made aware about the hazards associated with manual material handling.

7. *Communication System*

- a. Adequate communication facilities should be available and supported with uninterrupted power supply.
- b. Communication facilities should be checked periodically for its proper functioning.

8. *Accident Reporting, Investigation and Analysis*

- a. A system should be initiated at Rati Pushp Intermediates Pvt. Ltd. for accident and near miss reporting, investigation and analysis.

Risk Mitigation Measures for Spills

1. *Minor Spills*

Following measures will be taken in the event of minor spills at the facilities:

- a. Notify such immediate area.
- b. Limit access, prevent contamination spread.
- c. Survey personnel before exiting.
- d. Cover spill with absorbent material (unless liquid is flammable or oxidizing).
- e. Wipe test or survey for residual contamination as appropriate.
- f. Wash affected areas, then resurvey.
- g. Remove contaminated clothing and footwear.

- h. Package and label clean up materials for disposal.
- i. Record spill details and contamination monitoring results.
- j. Adjust inventory and waste records as appropriate

2. Major Spills

Following measures will be taken in the event of minor spills at the facilities:

- a. Persons not involved in the spill should leave the area immediately.
- b. Limit the movement of contaminated personnel until they are monitored.
- c. If a spill occurs in a laboratory, leave the fume hood running to minimize release of volatile materials to adjacent rooms or hallways.
- d. Close off and secure the spill area to prevent entry.
- e. Post warning signs.
- f. Select the appropriate PPE, shielding and absorbent spill materials like absorbent paper or spill pillows if the liquid is not a flammable or oxidizing agent.