

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

20th Dec., 2022

To,

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

Sub: Compliance report (Apr-2022 – Sep-2022) as per Environmental Clearance for Drug Intermediates manufacturing Units at 8th km Jansath Road, 1088/2 Shernagar, 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, New Delhi vide F. No. J-11011/204/2010 –IA II (I), dt. 25th August, 2011 the information along with the compliance status are given below –

1.	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 XV
3.	Consent (Air/Water) to Operate from UPPCB, Lucknow	:	Enclosed as Exhibit – B
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 PUSUP INTERMEDIATES PVT. LTD

Note - List of Enclosures on Next Page

ENCLOSURES:-

1.	Point wise compliance status.	Exhibit - A
2.	Consent (Air/Water) to Operate from UPPCB, Lucknow.	Exhibit – B
3.	Air Monitoring Test Report.	Exhibit - I
4	Proof of Displaying Environment data at factory main entry.	Exhibit - II
5.	NOC from CGWA	Exhibit - III
6.	Flow Chart of E.T.P.	Exhibit - IV
7.	Treated water testing report from ETP.	Exhibit - V
8.	Hazardous waste authorization certificate and contract with Bharat oil and waste management ltd.	Exhibit - VI
9.	Appointment letter from Dr. Tara Mohan for regular health checkups of employees	Exhibit - VII
10.	Ambient Noise level report.	Exhibit - VIII
11.	Layout plan of Rain water harvesting.	Exhibit - IX
12.	Record for Environmental Training program of employees.	Exhibit - X
13.	Photographs of CSR activities.	Exhibit - XI
14.	Form – V for Annual Environment statement FY 2021-2022.	Exhibit - XII
15.	Expansion – Environment Clearance by SEIAA vide letter No. 191/parya/SEIAA/5667/2019 dated 07/07/2020	Exhibit - XIII
16.	Details of Environmental protection and risk mitigation measures.	Exhibit - XIV
17.	Details of Disaster Management Plan.	Exhibit - XV

EXHIBIT-A

RATI PUSHP INTERMEDIATES PVT. LTD.,

8th Km Jansath Road, 1088/2, Shernagar, Muzaffarnagar, U.P. - 251001

Compliance status report (Apr 2022 – Sep 2022)

<u>For the conditions listed in the Environmental Clearance</u> <u>letter No. F.No.J-11011 / 204/2010-IA II (I) dt. 25th August,2011.</u>

A. <u>SPECIFIC CONDITIONS.</u>

<u>S. No.</u>	Conditions Listed in Environmental Clearance letter No. F.No.J-11011 / 204/2010- IA II (I) dt. 25 th August,2011	<u>Compliance Status</u>
i)	National emission standards for organic chemicals manufacturing industry issued by the ministry vide G.S.R. 608 (E) dated 21st july, 2010 and amended time to time shall be followed by the unit.	The Company is adhering to all the Environmental Standards applicable to the Industries of the same type 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. Only air emissions generated by the boiler and generator.
ii)	Ambient air quality data shall be collected as per NAAQES standards notified by the ministry vide G.S.R. 826 (E) dated 16 th September, 2009. The levels of PM ₁₀ , SO ₂ , NOx and VOC shall be monitored in the ambient air and displayed at a convenient location near the main gate of the company and at a importance public places. The company shall upload the results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and UP Pollution Control Board (UPPCB)	Ambient Air Quality Data has been already collected in project premises and monitored on a regular basis. The report has been enclosed as EXHIBIT – I Also, Proof of displaying environmental data is enclosed as EXHIBIT – II
iii)	In plant control of measures for checking fugitive emissions from the vulnerable sources shall be provided. Fugitive emissions shall be controlled by providing closed storage, closed	The production process being a wet one, the only source of Fugitive emission is Transportation of materials.

handling and conveyance of chemicals/materials, multi cyclone separator and water sprinkling system. Dust suppression system including water sprinkling system shall be provided at loading and unloading areas to control dust emissions. Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits stipulated by the UPPCB.

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.

- iv) For the further control of fugitive emissions, following steps shall be followed:
- All the control measures for fugitive emissions as directed in Environmental Clearance are in its place as per the feasibility.
- 1. Closed handling system shall be provided for chemicals
- 2. Reflux condenser shall be provided over reactor
- 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

- 3. System leak detection and repair of pump/pipeline based on preventive maintenance.
- 4. The acids shall be taken to reactors through closed pipeline. Storage tanks shall be vented through trap receiver and condenser operated on chilled water
 - provided over the reactor and condensers are operated by running chilled water to achieve complete condensation.
- 5. Cathodic protection shall be provided to the underground solvent storage tanks.

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 factory premises.
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.	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.
vi)	Solvent management shall be carried out as follows	All the control measures for Solvent Management as directed in Environmental Clearance is in its place as per the feasibility.
	1. Reactor shall be connected to chilled brine condenser system	
	2. Reactor and solvent handling pump shall have mechanical seals to prevent leakages.	Yes, Chilled brine solution is circulated in the condenser system and in the jackets of reactors to achieve maximum recovery.
	3. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.	
	4. Solvents shall be stored in a separate space specified with all safety measures.	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.
	5. Proper earthling shall be provided in all the electrical equipment wherever solvent handling is done	Also, Material safety data sheet (MSDS) of all the solvents and other chemicals are maintained as records and followed by plant.
	6. Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.	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.

		Also, closed and ventilated warehouses are provided for proper storage of chemicals.
		Proper earthling 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, 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 premises.
vii)	Total ground water requirement shall not exceed 2.5 m3/day and prior permission shall be obtained from the central ground water authority/state ground water board	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 - III
		Total ground water requirements are below 15m3/day as per the details below:
		Production Purpose: 2200 Litres/day approx. Cleaning & Sanitation: 1500 Litres/day approx.
		Gardening: 2700 Litres/day approx.

viii)	Total industrial effluent generation shall not exceed 0.2 m3/day. Industrial effluent shall be treated in ETP. Treated effluent shall be reused/recycled within the factory premises. Water quality of treated effluated shall meet the norms prescribed by CPCB/SPCB.	Yes, Total industrial effluent generated is below 0.2m3/day which is also solar evaporated after treatment from the Effluent treatment plant. The quantity of Industrial effluent is restrained to the stated quantity. Industrial Effluent is been treated in the ETP and the Process flowchart is herewith enclosed as Exhibit – IV in which the Treated water is further evaporated by means of solar evaporation so that Zero discharge philosophy can be maintained in the plant.
ix)	No effluent will be discharged outside the factory premises and zero discharged concepts shall be adopted.	"Zero Discharge" philosophy is adopted as declared in the EIA report during the production. Moreover, water test report after treatment by E.T.P. is enclosed as EXHIBIT –V.
		This treated water is then transferred for Solar Evaporation to the drying beds which is equipped with Pump and Sprayers to achieve the 100% Zero discharge policy.
x)	Hazardous chemicals shall be stored in tanks, tank forms, drums, carboys, etc. flame arresters shall be provided on tank farm. Solvent transfer shall be by pumps.	All the control measures for Hazardous chemicals as directed in Environmental Clearance 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 fire fighting equipments are provided like Automatic Fire Hydrant powder System, ABC fire extinguishers, CO₂ fire extinguishers, Automatic Fire detectors, Fire Alarms and Automatic Panel operated Fire water pumps with proper water pipelines with pipes and sprayer are systems provided in the Hazardous chemicals warehousing facilities.

The company shall obtain authorization for collection, storage and disposal of hazardous waste under the hazardous waste (management, handling and trans boundary movement) rules, 2008 and amended as on date for management of hazardous waste and prior permission from USPCB shall be obtained for disposal of solid/hazardous waste in TSDF. Measures shall be taken for the fire fighting 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.

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 – VI**

In case of Emergency, Proper fire fighting equipments are provided like Automatic Fire Hydrant System, ABC powder fire extinguishers, CO₂ fire extinguishers, Automatic Fire detectors, Fire Alarms and Automatic Panel operated Fire water pumps with proper water pipelines with pipes and sprayer systems are provided in the Hazardous chemicals warehousing facilities.

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.	No Hazardous products are manufactured in the plant. 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.
xiii)	Entire plant where solvents are used shall 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, fire fighting equipments and water arrangements are also provided nearby.
		Proper fire fighting equipments are provided like Automatic Fire Hydrant System, ABC powder fire extinguishers, CO ₂ fire extinguishers, Automatic Fire detectors, Fire Alarms and Automatic Panel operated Fire water pumps with proper water pipelines with pipes and sprayer systems are provided.
		As the Solvents are required, used and stored in very small quantities No storage tanks are required however, these solvents are stored in HDPE drums.
xiv)	The company shall undertake following waste minimization measures:	Waste minimization is been a priority in operation of the company and all the conditions stated in environmental clearance is been complied strictly.
	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.	Waste minimization techniques are followed as per below:
	c. Use of automated filing to minimize spillage d. Use of close feed system into batch reactors	 Prevention or avoiding the waste Minimization of the waste as much as possible.
	e. Venting equipment through vapors recovery system.	3. Reuse if possible.
	f. Use of high pressure hoses for equipment clearing to reduce water generation.	4. Recycling.
		5. 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.
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	The Company is been following all the relevant rules and guidelines to prevent any type of fire hazards.
	norms.	Proper fire fighting equipments are provided like Automatic Fire Hydrant System, ABC powder fire extinguishers, CO ₂ fire extinguishers, Automatic Fire detectors, Fire Alarms and Automatic Panel operated Fire water pumps with proper water pipelines with pipes and sprayer systems are provided in the Plant.
xvi)	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the factories act.	Dr. Tara Mohan (M.B.B.S., M.D.) Has been appointed by the firm for the health checkups of employees and proper surveillance records are maintained by the firm in this regard

		his consent letter and latest surveillance records of the employees are enclosed as EXHIBIT – VII
xvii)	Green belt shall be developed in 33% of total plot area. Selection of plant species shall be as per the CPCB guidelines.	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 – 50 Nos. Fruits Plants – 15 Nos. Fountain Plants – 6 Nos. Other Plants – 50 Nos. Plants/flowerpots – 500Nos. Approx.
xviii)	Provision shall be made for the housing of the construction labor within the site with the necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water, medical health care etc. the housing may be in the form of temporary structure to be removed after the completion of the project. All the construction washes shall be managed so that there is no impact on the surrounding environment.	The construction of the project facilities has been completed as declared during the process of Grant of Environmental Clearance. Thus the condition is not applicable at this moment.

B. GENERAL CONDITIONS.

i.	The projects authorities shall strictly adhere to the stipulations made by the UP Pollution Control Board.	The project is strictly adhering to all the stipulations made by the UP Pollution control board.
ii.	No further expansion or modification 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 the 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.	Agreed and is been complied. For the expansion of the project, we have applied for environmental clearance to MoEF and the project has got the environment clearance by SEIAA vide letter No. 191/Parya/SEIAA/5667/2019 dated 07/07/2020 which is also enclosed as EXHIBIT – XIII

iii.	The locations of ambient air quality monitoring stations shall be decided in consultation with state pollution control board (SPCB) and it shall be ensured that at least one stations is installed in the upwind and downwind direction as well as where maximum ground level conditions are anticipated.	Ambient Air Quality Data is been collected within project premises on a regular basis. The report has been enclosed as EXHIBIT-I.
iv.	The overall noise levels in an around the plant area shall be kept well within the standards by providing noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (protection) Act, 1986 rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	The operation of the plant is conforming to the guidelines and standards of Noise pollution. Analysis report on ambient noise level is also attached with this report as EXHIBIT-VIII.
v.	The company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the groundwater 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. Also, Layout Plan for rain water
		harvesting is enclosed as EXHIBIT – IX
Vi	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 the employees on handling of chemicals shall be imparted.	All the norms of occupational health and safety is been strictly complied. Dr. Tara Mohan (M.B.B.S., M.D.) Has been appointed by the firm for the health checkups of employees and proper surveillance records are maintained by the firm in this regard his consent letter and latest surveillance records of the employees are enclosed as EXHIBIT – VII
		A regular training program regarding environment protection has been done by the plant and record for the same has been maintained by the plant on regular basis.
		Record for training program is enclosed as EXHIBIT – X

Vii	Usage of personnel protection equipments (PPEs) by all employees/ workers shall be ensured.	All the norms of occupational health and safety is been strictly complied by the company. Usage of PPE's including Aprons, gowns, masks, gloves, head caps, chemical resistant shoes are strictly followed by the plant.
Viii	The company shall also comply with all the environmental protection measures and safe guards proposed in the documents submitted to the ministry. All the recommendations made in the EIA/EMP in respect of the environmental management, risk mitigation measures and public hearing relating to the project shall be implemented.	Strict adherence to EIA/EMP report is practiced. Details of Environmental protection and risk mitigation measures are enclosed with EXHIBIT – XIV Detailed Disaster Management Plan is also enclosed as EXHIBIT – XV
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.	CSR activities as per the relevance is been done on regular basis as recorded in EIA/EMP Report. CSR activities like Eye Camp, Food & cloth Distribution etc. carried out by the plant on regular intervals and Photographs of the same has been enclosed as EXHIBIT – XI
X	The company shall undertake eco-developmental activities measures including community welfare measures in the project area for the overall improvement of the environment.	1 1
Xi	A separate Environment management cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental management and monitoring functions.	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.

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 purpose for any other purpose.	The fund allocated for environmental measures is being used in ecodevelopment and allied activities only. Total Funds allocated for Management, Pollution control measures, Greenbelt, CSR etc for the last two years is as below: FY 2020-2021 – 2,95,130/- FY 2021-2022 – 4,19,567/- FY 2022-till date – 3,50,377/-
Xiii	A copy of the clearance letter to be sent to the project proponent to concerned panchayat, zila parishad/municipal corporation, urban local body and the local NGO, if any from who suggestions/ representations, if any, were received while processing the proposal.	Already Circulated as per Notification.
Xiv	The project proponent shall also submit six months reports on the status of the compliance of the stipulated Environmental clearance conditions including results of the monitored data (both in hard as well by e mail) to the respective regional office of MOEF, the respective zonal office of the CPCB and the UP Pollution control board. A copy of Environmental clearance and six monthly compliance status reports shall be posted on the website of the company.	The plant is submitting every Six Months Compliance status report of all the stipulated environmental clearance conditions to the respective regional office of MOEF and UP Pollution control board. Six Months Compliance status report of all the stipulated environmental clearance conditions has also been uploaded on the company's website and it can be checked on the following website:
		www.ratipushp.com
Xv	The environmental statement for each financial year ending 31 st march in form v as is mandated shall be submitted to the concerned state pollution control board as prescribed under the environment (protection) rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of	Rs. 4,19,567/- (in FY 2021-2022) & FY 2022-till date – 3,50,377/- is the total Expenditure incurred on compliance of environmental conditions/pollution control, Greenbelt, CSR etc.

	compliance of environmental clearance conditions and shall also sent to the respective regional offices of MoeF by e-mail.	In this regard Form – V for Annual Environment statement for FY 2021-2022 is enclosed as EXHIBIT – XII
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 SPCB/committee and may also be seen at the website of the ministry at http://envfor.nic.in. this shall be advertised within seven days from the date of issue of clearance letter, at least in two local newspapers that are widely circulated in region of which one shall be in the vernacular language of the locality concerned and copy of the same shall be forwarded to the concerned regional office of the ministry.	Advertisement has been already published in two local newspapers namely Muzaffarnagar Bulletin and Shah Times on 24.02.2012. Copy of the advertisements were already attached previously.
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.	Is been complied accordingly.

EXHIBIT-B

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

- 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.
- This consent is valid for the period from 01/01/2019 to 31/12/2023.
- Inspite 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 (Previntion and Controt 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 DIGITAL DIGITAL

C.E.O C-3

Enclosed : As above (condition of consent):

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

PARAS Digitally signed by PARAS AATH Date: 2018,12.39 C-3

NATH 1933:18-05'39' C-3

U.P. Pollution Control Board

Dated: 30/12/2018

CONDITIONS OF CONSENT

- 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 S	ource Details		
S.No	Air Polution 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				

- 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.
- 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.
- 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:

 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.

The industry should ensure the operation of the air pollution control system (APCS) in such a manner that the air emission confirms 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.

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.

 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.

Industry shall submit monitoring reports of all stacks and ambient air quality from a certified

/approved laboratory under E.P. Act 1986.

 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.

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.

 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

ourt order.

12. The Industry will use minimum 20% Bio Briquette as fuel in the Boiler depending upon its availability.

Industry shall submit Environmental Statement in prescribed format as per rule no.14 as per E.P.

Rules 1986.

 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 URLhttp://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 algorid by 748945 (4078) NATH Date: 2018.12.20 1921-95 (40530)

C-3

C.E.O

U.P. Pollution Control Board

CONSENT ORDER

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

 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

refrence to their foresaid application .

This consent is valid for the period from 01/01/2019 to 31/12/2023.

 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 (Previntion and Controt 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

PARAS NATH Date: 2618.12.30

Dated: 30/12/2018

C.E.O C-3

Enclosed : As above (condition of consent):

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

PARAS bytelestration C.E.O

NATH bytelestration C.3

Dated: 30/12/2018

U.P. POLLUTION CONTROL BOARD, LUCKNOW

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

Consent Order No. 3952065/ Water

Dated: 30/12/2018

CONDITIONS OF CONSENT

 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...

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

	Effluent Di	scharge Details	
S.No	Kind of Effulant	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 Effulant					
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 Effulant	
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.
- 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.
- 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.

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,

 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 URLhttp://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 Deplativaged by PARAS NATH Deer 2018.12.20

C.E.O C-3

EXHIBIT-I



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001: 2015, ISO 14801: 2015 & OHSAS 18001: 2007) Govt. Approved Laboratory, Recognised by MoEF

A-5/4, Mayapuri Industrial Area, Phase-II, New Delhi-110061, Ph.: 011-28115459, 41848475, 9654958120 E-mail: shreekrishnalab@gmail.com, info@skaslab.com, Web.: www.skaslab.com

TEST CERTIFICATE

Issued To	RATI PUS	HP INTERMEDIATES (P) LTD	Report No	ENV-190522056
	8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001		Date Of Monitoring	18/05/2022
			Date of sample Received	19/05/2022
Nature of the	ne Sample	STACK EMISSION (BOILER 250 KG)	Test Started On	19/05/2022
Customer Ref. No		Nii	Test Completed on	24/05/2022

Description- One stack sample Emission sample Monitoring was carried out on: 18/05/2022

Sampling Details:

Instrument Used for Monitoring

: Stack monitoring Kit

OFFICIAL DETAIL

Plant/Section

: Boiler Section

ack identification

: Stack Attached with Boiler Set

Source of Emission

: Boiler- (250 Kg)

Quantity of Fuel used

: 7 Ltrs/Hour

Control Measure if Any

: NII

Technical Detail

Capacity

: Boiler-(250 Kg)

Diameter of stack

: 225 mm

Height from Ground Level

: 14 mtr

Height of sampling point from ground Level : 3 mtr

Type of fuel used

Normal operating schedule

: As per Requirement

Duration of Monitoring (Minutes)

:30.0

Observations at Site

Ambient Temperature ("C)

: 31

Stack Temperature (°C)

: 158

Velocity (m/s)

: 18.8

Quantity of Emission (Nm3/hr)-(Volumetric flow rate): 1825.6

No.	Parameter	Results	Units	Requirements as per EPA	Test Methods
1.	Rarticulate Matter(as PM)	51.4	mg/Nm³	150	IS: 11255 (Part -1)
2.	Oxide of Nitrogen (as NO2)	38.9	mg/Nm ³	NA	IS: 11255(Part-7)
3.	Carbon Monoxide (as CO)	0.0062	% by volume	1	IS: 13270
4.	Sulphur Dioxide (as SO2)	28.4	mg/Nm³	NA	IS: 11255 (Part-2)

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

*** End of Report ***



Authorized Signatory

EXHIBIT-II



EXHIBIT-III



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}

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 Existin	ng 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 Ca	se of Electric Pump)	01/04/2013	
Maximum Allowable Rate	5.00	Maximum Allowable	3.00

4500

This No-Objection certificate authorizes the owner applicant (user) to sink a well in the location specified at SI. (2) for extraction of ground water at a rate not exceeding that as shown at SI. (3j), for Running Hours per day as shown at SI. (3k), and for maximum allowable annual extraction of ground water as shown at SI. (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 SI. (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 I 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	le Ouentum of Cround water withdrawal (aum/day) Ne of piezem		Monitiring Mechanism		
5.110	Quantum of Ground water withdrawal (cum/day)	No.of piezometers required	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 It 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-IV

ETP FLOW DIAGRAM

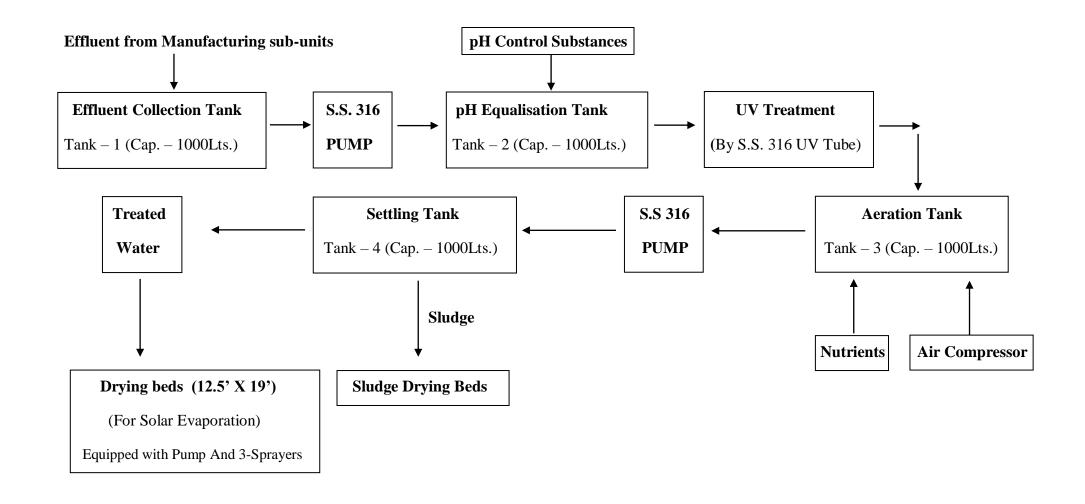


EXHIBIT-V



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, 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, 965499 E-mail: shreekrishnalab@gmail.com, info@skaslab.com, Web.: www.skaslab.com



TEST CERTIFICATE

8th., KM. STONE, JANSATH ROAD, SHER NAGAR, MUZAFFARNAGAR, UTTAR PRADESH-251001 UP Nature of the Sample ETP TREATED WATER Test Started On 19/05/2022	Issued To RATI P		HP INTERMEDIATES (P) LTD	Report No	ENV-190522057
Nature of the Sample ETP TREATED WATER Test Started On 19/05/2022		8th., KM. STONE, JANSATH ROAD, SHER NAGAR,			
Sample Code NA Test Completed on 24/05/2022			Test Started On	19/05/2022	
	Sample C	ode	NA	Test Completed on	24/05/2022
Customer Ref. No Nil Date of Report Issued 24/05/2022	Customer	Ref. No	Nil	Date of Report Issued	24/05/2022

SAMPLING & ANALYSIS DATA

ample Drawn By

: Mr. Kuldeep

Date Of Sampling

: 18/05/2022

Sampling Location

: NS

Sampling Co-Ordinates

: NA

Sample Quantity

: 2 Ltr + 500 ml

Sample packing Details

: Plastic Bottle & Glass Bottle

Sampling Method

: IS: 3025 (P-1)

Environmental Conditions

: Normal

TEST RESULTS

S.No.	Test Parameters	Units	Results	LIMITS	Method
1	pH		7.13	5.5 to 9.0	IS: 3025 (P-11)
2	Total Suspended Solids (as TSS)	mg/t	32.6	100	IS: 3025 (P-17)
3	Oil & Grease	mg/l	2.3	10	IS: 3025 (P-39)
4	Biochemical Oxygen Demand(for 3 days at 27 deg. C) (as BOD)	mg/l	23	30	IS: 3025 (P-44)
	Chemical Oxygen Demand (as COD)	mg/l	172	250	IS: 3025 (P-58)

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

End of Report





EXHIBIT-VI

FORM 10
[See rule 19 (1)]
MANIFEST FOR HAZARDOUS AND OTHER WASTE

Occupier's Name & Mailing Address (including Phone No, and email)						
2 Sender's Authorization No.						
3 Manifest Document No.	D-000005 D+ 3019/22 "					
4 Transporter's Name & Address	0 00000					
(including Phone No. and email)	Porty-self 1997					
5 Type of Vehicle	(Truck / Tanker / Special Vehicl					
6 Transporter's Registration	2/1/6/1/2					
7 Vehicle Registration No.	JP12-13T0929 4992998					
8 Receiver's Name & Mailing Address (including Phone No. and email)	(I) BHARAT OIL COMPANY (I) R. E-18, Site-IV. Sahibabad Industrial Area. Ghaziabad, UP-201010 Tel.: 0120-4167924, e-mail:sales@bharatoil.com					
(II) BHARAT OIL & WASTE MANAGEMENT LTD Mauza Mukimpur, Roorkee-Lakshar Road, Roorkee - 247684 UK, Tel::08874207864 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.	(I) 1486/UPPCB/Ghaziabad/UPPCBRO/JHWM/GHAZIABAD/2018 Valid upto: 03/05/2023					
(ii) UEPPCB/HO/Con-B-84/2018/548 Valid upto: 31/03/2023	(HII)14G3UPPCB:KanpurDehat(UPPCBROYHWM/KANPUR DEHAT/2018 Valid upto:30/04/2023)					
10 Waste Description PolyHere waste, 678 shape	Paperwate, used ships story, colots with					
No. of Containers	918- 618 m'or MT 11/8- Rubber warre - 2209					
12 Physical Form	(Solid/Semi-Solid/Sludge/Oily/Tarry/Slurry/Liquid)					
3 Special Handling Instructions & Additional Information	Do not throw Drums from truck. In case of leakage/ seapage, use Washing soap at point of leak to stop its leakage.					
4 SENDER'S CERTIFICATE	I hereby declare that the contents of the consignment are fully and accurately					
Typed Name & Stamp : Signature :	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					
	Month Day Year					
	09302022					
5 Transporter Acknowledgement of Receipt of Waste	Month Day Year					
Typed Name & Stamp . Signature :	08 30 20 27					
6 Receiver's Certificate for Receipt of Hazardous and other Waste	Month Day Year					
Typed Name & Stamp Signature 9	09302027-					



Bharat Oil & Waste Management Ltd.

Since 1978

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





MEMBERSHIP CERTIFICATE

M / s. Rati Pushp Intermediates Pvt. Ltd.

8th KM, Jansath Road Muzaffarnagar-251001, UP

is a registered member of our facility



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

for safe, legal & scientific Disposal of Hazardous Waste

Member #: <u>BOWML/K/3868/20</u>

Expiry Date: August 17, 2023



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 Date: 2022-12-17 10:16:31
Sales Cordinator IP: 49.36.182.174

sales@bharatoil.com ID: Q+7R6OZ5BZDAu6FuAkQ6Xw==

Click here to E-verify

For Bharat Oil & Waste Management Ltd.

Sunder K Kukreja GM (Admin & Fin.) sales@bharatoil.com

Digitally Signed By:Sunder K Kukreja Date: 2022-12-17 10:50:51 IP: 49.36.182.174

ID: sqHe8sUdh9RPwc9paNxFfA==

Click here to E-verify

Authorized Signatory

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)



उत्तर घ्रदेश UTTAR PRADESH

FM 440166

AGREEMENT

THIS AGREEMENT made on this 18th day of August, 2020 between M/s RATI PUSHP 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 Pushp Internal Management Ltd age 1

-

Disector

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: -

- 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 Lad

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.
- 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.
- 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.
- 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.
- 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 For Bharat Oil & Waste Management Ltd.

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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.
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For Bharat Oil & Waste Management Ltd.

Page 4

- 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:

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

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For Bharat Oil & Waste Management Ldd.

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- 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.

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For Bharat Oil & Waste Management Ldd.

- 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.
- 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.
- 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 For Bharat Oil & Waste Management Md. For Rati Pushp Interme

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 collection/ operation The actual attached). 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.

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For Bharat Oil & Waste Management Ltd.

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

For Rati Pushp Intermediates Pyter Rati Poshp Intermediates Pyter Rational Pyter	For Bharat Oil & Waste Management Ltd/ Bharat Oil Company (I) Regd. For Bharat Oil & Waste Management Md. Director Director /Partner (Naresh Manglani)/BT Manglani
Witnesses: Atul Kumar Gupta 09837034764	Sandeep Kumar 9717700119 Sandeep.kumar@bharatoil.com
GST No. PAN No. CIN No. Phone No. Email Id O9AAFCR9874F1ZS AAFCR9874F 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 PUSHP 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.

a) 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.

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- Quoted rated are inclusive of GST, with container.
- c) We will lift full loaded capacity of vehicle.

For Bharat Oil & Waste Management Ldd.

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Director

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01. <u>USER CHARGES</u>: <u>FIRST PART</u> 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	Quanti ty/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 &d.

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- 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

For Bharat Oil & Waste Management Ldd.

For Rati Pushp Intermedia

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

- 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 For Bharat Oil & Waste Management and. For Rati Pushp Intermediate

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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 PARTshall indemnify the SECOND PART for / during the transport, storage, unloading, treatment, disposal for the said waste.

For RATI PUSHP INTERMEDIATES Pvt. Ltd.

For Rati Pushp Intermediates Pvt

ABHISHEK GUPTA (Managing Director)

(First Part)

For Bharat Oil & Waste Management Ltd/ Bharat Oil Company (I) Regd.

For Bharat Oil & Waste Management Ldd.

Director

Director /Partner (Naresh Manglani)/BT Manglani

(Second Part)

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 with in 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.

For RATI PUSHP INTERMEDIATES Pvt.

Ltd.

For Rati Pushp Intermedia

ABHISHEK GUPTA (Managing Director)

(First Part)

For Bharat Oil & Waste Management Ltd/ Bharat Oil Company (I) Regd.

For Bharat Oil & Waste Management Ltd.

Disector

(Naresh Manglani)/BT Manglani Director /Partner

(Second Part)

U.P. Pollution Control Board

CONSENT ORDER

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

Dated: 30/12/2018

Te,

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

 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.

This consent is valid for the period from 01/01/2019 to 31/12/2023.

Inspite 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 (Previntion and Controt 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

NATH MATERIAL

C.E.O C-3

Enclosed : As above (condition of consent):

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

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U.P. Pollution Control Board

Dated: 30/12/2018

CONDITIONS OF CONSENT

 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.

	A	Air Pollution S	Source Details		
S.No	Air Polution 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 Qu	ality Details Detail	
S.No	Stack No	Parameter	Standard
1	1/16:15	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

- 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.
- 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.
- 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 monitering 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.

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 confirms 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.

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.

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.

Industry shall submit monitoring reports of all stacks and ambient air quality from a certified

/approved laboratory under E.P. Act 1986.

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.

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.

The Industry will use minimum 20% Bio Briquette as fuel in the Boiler depending upon its availability.

Industry shall submit Environmental Statement in prescribed format as per rule no.14 as per E.P.

 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 URLhttp://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 .

C.E.O

C-3

U.P. Pellution 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

- 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 refrence to their foresaid application.
- This consent is valid for the period from 01/01/2019 to 31/12/2023.
- 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 (Previntion and Controt 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

PARAS NATH by PARAS SATIN
Date 2918-12.30
19.30.49-15767
C-3

Enclosed : As above (condition of consent):

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

NATH ISSUITABLE C.3

U.P. POLLUTION CONTROL BOARD, LUCKNOW

Annexure to Consent issued to M/s, RATI PUSHP INTERMEDIATES PVT LTD vide

Consent Order No. 3952065/ Water

Dated: 30/12/2018

CONDITIONS OF CONSENT

 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 Di	scharge Details	471
S.No	Kind of Effulant	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 Effulant	
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 Effulant	
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.
- 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.

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 URLhttp://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 .

C.E.O C-3



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

Registration Certificate

Registration Number: 09AAFCR9874F12S

	Legal Name	RATI PU	SHP INTERMED	FATES PRIV	ATE LIMITED	
2.	Trade Name, if any	M/S RAT	M/S RATI PUSHP INTERMEDIATES (P) LTD.			
3.	Constitution of Business	Private Li	mited Company			
4.	Address of Principal Place of Business	8th., KM. Muzaffarr	8th., KM. STONE, IANSATH ROAD, SHER NAGAR, Muzaffernagar, Ulter Predesh, 251001			
5.	Date of Liability	01/07/201	7			
6.	Period of Validity	From	01/07/2017	То	. NA	
7.	Type of Registration	Regular				
8.	Particulars of Approving Autho	rity				
Signa	Sign Dig	gnature Not Vigilled pitally signed by DS ID SERVICES - AX I lie: 2018.07.28-43:31	GOCIDS NETWORK 1 1:02 IST			
			_			
Name						
Desig			•			

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 PVL Ltd.

Abhishek Gupta / (Managing Director)

EXHIBIT-VII

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

MEDICAL FITNESS

NAME

: MR. ABHISHEK GUPTA (MFG. Chimis

FATHER'S NAME

: SH. ATUL KUMAR GUPTA

AGE

: 32 YEAR.

DATE

: 09 12 2022

It is to be certified that Shri ABHI SHEK 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 Quil Pushp Intermo

ABRS. M.D. RAY OGR ARSO Mer

Authorized Docato Curtab National Bank Mutaffarma04-251004

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

MEDICAL FITNESS

NAME

: MOHIT KUMAR (Analytical chemist

FATHER'S NAME

SH. RICHHPAL SINGH

AGE

: 34 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri MOHIT KUMAR son of SH. RICHHPAL 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-BONE

For Qui Pushp Inter

Candidate's Signature

M B.B.S. M.D. AM. COP. ARSO HAVE Authorized Doctor Puntab National Earth Moral Survey Court

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

MEDICAL FITNESS

NAME

: VINESH KUMAR

FATHER'S NAME

: SH. MANGOO STNGH

AGE

: 32 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri VINE SH KUMARSON 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 : DONE / NOT DONE

For 'Rul Tushp Interme

Doctor's Signature

DR TARABOMAN M 8 8 8 M. M.D., MA COP, ARSO NHS Pough No. Jacks 17135 Authorized Doctor Purish tablement unit Sales and Sales and Cont

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

MEDICAL FITNESS

NAME

: AJAY KUMAR

FATHER'S NAME

: SH. SATYA PAL SINGH

AGE

: 33 YEAR.

DATE

09/12/2022

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

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-BONE

For Part Pushp Intermedia

Candidate's Signature

DR. TARABONAN MBBB. M.Q. BLACGP, ARSO MAC

Authorized Doctor Purijati National Gene 1 MATS THE LAW TO SERVICE !

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

MEDICAL FITNESS

NAME

: PRASHANT KUMAR

FATHER'S NAME

: SH. ANIL KUMAR

AGE

: 29 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri PRASHANT KOMASON 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 'Rail Tushp Interme

Candidate's Signature

Doctor's Signature DR. TARAMOHAN

WEBS, M.D., BLACEP, ARSO MA Reggi, No. 41011135 INTERNET CHARLE Purion Plansant Bank 1 117 2 1100

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

MEDICAL FITNESS

NAME

: DEVVRAT TYAGI

FATHER'S NAME

: SH. RAJENDRA PRASAD TYAGI

AGE

: 31 YEAR.

DATE

09 12 2022

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 Wall Pushp Interme

Regit No. 18091135 Authorized Sociol

Printed States at Shirth 1100 To 1100 To 1100 To

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

MEDICAL FITNESS

NAME

: ADESH KUMAR

FATHER'S NAME

: SH SURAT

AGE

: 63 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri ADESH KUMAR son of SH. SURAT

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 Qui Pushp Intermedia

lanaging Director

Candidate's Signature

Doctor's Signature COR, MCO

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

MEDICAL FITNESS

NAME

: KRISHANA KUMAR

FATHER'S NAME

: SH. SARARSVEER

AGE

: 38 YEAR

DATE

: 09/12/2022

It is to be certified that Shri KRISHANA KUMANON OF SH. SARAR SVEER

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 'Red Dushp Intermediates

Candidate's Signature

Authorised Doctor

Puryab Nestoned Bas Muzaflarnagar-251001

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

MEDICAL FITNESS

NAME

: ANKUR

FATHER'S NAME

: SH. RAT SINGH

AGE

: 29 YEAR

DATE

: 09/12/2022

It is to be certified that Shri ANKUR son of SH. RAT STNGH
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 IRali Pushp Intermedials Pvi d.

નિંભિન્દી દેવા Candidate's Signature Doctor Solgnafire ARSO No.

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

MEDICAL FITNESS

NAME

: RAHUL KUMAR

FATHER'S NAME

: SH. CHANDRA BOSH

AGE

: 30 YEAR.

DATE

: 09/12/2022

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 'Rais Tuehn Intermediates Public

Candidate's Signature

Doctor's Signature OSP, ARSO Me

2 5 Perga. No. 140 Doctor
Authoritied Doctor
Purples National Park
Purples National 25 1001

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

MEDICAL FITNESS

NAME

: SHIVKUMAR

FATHER'S NAME

: LATERAMESH

AGE

: 35 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri SHIVKUMAR son of SH. 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 their quality informediates Put Ltd.

Managing Urector

Candidate's Signature

Doctor's Signature, Cop. ARSO him Portor & Signature, School Banks, Purison Manager 25 1001

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

MEDICAL FITNESS

NAME

: BITTOO

FATHER'S NAME

: SH. JAGDISH SINGH

AGE

: 19 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri_ BITTOO

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 Quit Pushp Intermed

Bittoo

Candidate's Signature

Doctor's Signature ARSO hes

Regn. No. 48C10135 Authorized Doctor Punjah National Bank Autaflamagar 251001

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

MEDICAL FITNESS

NAME

: GUDDU

FATHER'S NAME

: SH. KAVINORA

AGE

: 30 YEAR.

DATE

09/12/2022

It is to be certified that Shri_6UDDU

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 Wait Dushp Interm

Candidate's Signature

Doctor's Signature 1950 Med

S.M.D. MACO RIGHT. NO. 48 10136 withoutend Doctri P Front Vallotted Berry Sharadaraga 251004

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

MEDICAL FITNESS

NAME

: VIPIN KUMAR

FATHER'S NAME

: SH. OM BIR

AGE

: 22 YEAR.

DATE

: 09/12/2022

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 : DONE/NOT DONE

For spen spensho Intermediates P. Ltd.

Candidate's Signature

Doctor's Signature 250 Mers
DN M.D. Brook Ascholas
Person No. 48 Children
Purisis National Bank
Purisis National Bank
Purisis National Bank

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

MEDICAL FITNESS

NAME

: KAPIL SHARMA

FATHER'S NAME

: SH. SUDHIR SHARMA

AGE

: 24 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri KAPIL SHARMAson 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 Qui pusho Intermediates Pvt Id.

Candidate's Signature

Doctor's Signature ARSO Med DR. M.D. MACAUTSC Regn. Mo. McCAUTSC Authorised Doctor Authorised Doctor Authorised Regn.

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

MEDICAL FITNESS

NAME

: ANUJ KUMAR

FATHER'S NAME

: SH. SURATMAL

AGE

: 20 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri ANUT KUMAR son of SH. SURATMAL

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 BONE

For tRad Quishp Intermediates Pvt 1td.
Man Grig Director

Candidate's Signature

Doctor's Signature GP, ARSO Mr. A.S. M.O., Mr. A.MC.10136
Regn. No. A.MC.10136
Regn. No. A.MC.10136
Authorized Boots
Authorized Boots
Authorized Boots
Authorized State
Authoriz

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

MEDICAL FITNESS

NAME

: AJAY KUMAR

FATHER'S NAME

: SH. KARAM CHAND SAINI

AGE

: 37 YEAR.

DATE

: 09/12/2022

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 Test Tushp Intermediates Pvt Ltd.

기에지 알키니 Candidate's Signature Doctor's Signature Doctor

Authorised Doctor

Purised National Bank

Muzaffarnagar 25 1081

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

MEDICAL FITNESS

NAME

: AVNEESH

FATHER'S NAME

SH. SANJAY.

AGE

: 27 YEAR.

DATE

: 09/12/2022

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 Quit Pushp Intermediates P

अवनीया

Candidate's Signature

Doctor's Signature No. 35 Authorised Decine

Purpalo National Bank Virginiagar-261084

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

MEDICAL FITNESS

NAME

: LAKSHYA KUMAR

FATHER'S NAME

: SH JITENORA KUMAR

AGE

: 20 YEAR.

DATE

: 09/12/2022

It is to be certified that Shri LAKSHYA KUMARson of SH. TITENORA 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 'Quit (Pushp Intermediates Pvt 11d)

Managing Wirector

Candidate's Signature

Doctor's Signature Mc2/0135

Authorised Doctor

EXHIBIT-VIII



SHREE KRISHNA ANALYTICAL SERVICES PVT. LTD.

(An ISO 9001 : 2015, 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: shreekrishnafab@gmail.com, info@skaslab.com, Web.: www.skaslab.com

TEST CERTIFICATE

Issued To	RATI PUSHP INTERMEDIATES (P) LTD 8th., KM. STONE, JANSATH ROAD, SHER NAGAR,		Report No	ENV-190522058
			Date Of Monitoring	18/05/2022
	MUZAFFAF	NAGAR, UTTAR PRADESH-251001	Date of sample Received	19/05/2022
Nature of the	ne Sample	DG NOISE (62.5 KVA)	Test Started On	19/05/2022
Customer F	Ref. No	Nil	Test Completed on	24/05/2022

DG NOISE LEVEL

MONITORING DETAILS

Date of Monitoring

Monitoring Done by

Weather Condition

: 18/05/2022

: Mr. Kuldeep

: Clear Sky

TEST RESULT

S.No.	Location	Unit of Measurements	Result	Requirements As per EPA act 1986	Method Reference
1.	Noise Level when canopy door is open	dB(A)	99.8	-	IS 9876:1981, RA 1997
2.	Noise Level when canopy door is Closed at a Distance of 1.0 meter	dB(A)	70.5	75 max	IS 9876:1981, RA 1997
3.	Insertion loss	dB(A)	29.3	25 min	

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

*** End of Report ***

Kulder Analyst



Authorized Signatory

EXHIBIT-IX

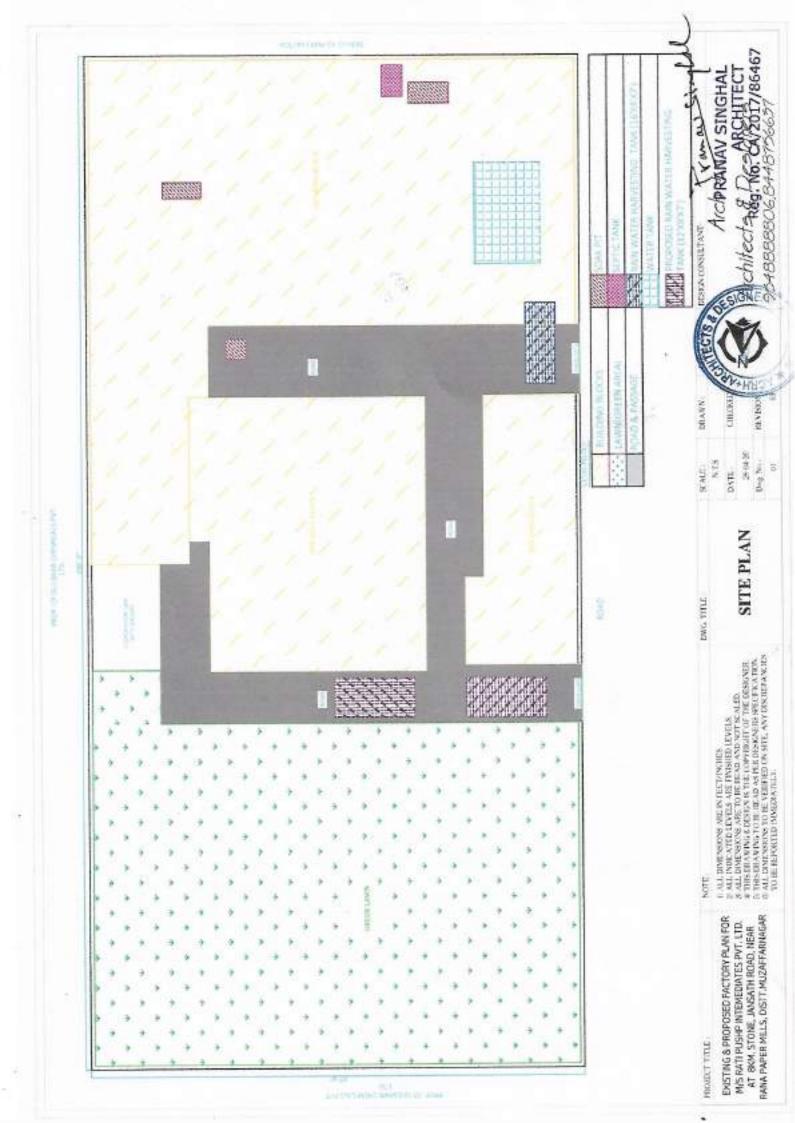


EXHIBIT-X

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

		RECORD FOR TRAINING OF EM	PLUTE	Date		
S. No.		Aspects	Remarks (if Any)	Training Given to the Employees	Attendance of Employees	Signature of Employees
1	Ci lii tn	Themical / Solvents handling aspects like operating S.S Pumps for ransferring chemicals to reactors without any spillage, operating Drum inters etc.	ok.	Mohit Sharing Vinish sharing Pagsharit	P P	Chocood P. Kungy
2	P	Proper storage of chemicals / Solvents without any leaks and spillage.	ok.	Devivorat.	f	Derbyn'
1	T c	Fraining regarding proper sanitization, cleaning/washing aspects of all plant premises and machinery equipments, usage of PPF'S including Aprons / Gowns, Mask, Gloves, Head Caps, chemicals resistant shoes etc.	ok.	Pahul Vipin Bitoo	PP	RAHUL Within 37to
A		Green Belt Maintenance and Development	ok	Adush	P	30721
4	2	Air Pollution related aspects like Stacks of Boiler, DG sets, Monitoring, Sprinkling of water on roads for cleaning and climination of dust etc	ok.	Amit buined Kurshan	P	3-18-a Krisson
5	6	Water Pollution related aspects like water treatment by effluent treatment Plant (ETP.), ETP sludge management etc.	ok.	Vikash Ankur	P.	Portel
	7	Noise Pollution related aspects like Acoustic system provided for noise reduction in Boiler & DG sets.	ok.	Amil Shivkuman	P	And Kerns
	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.	Provinted		स्ट्रेड्ड स्ट्रेड्ड
	g	Rain water Harvesting	ok.	Vishal	ρ	विशाली
	10	Encouragement for new tree plantation and importance of environment in our society.	ok	· Tyshan	- P	4912

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

	RECORD FOR TRAINING OF EM	PLOYEE	Date	06/09/22	
S. No.	Aspects	Remarks (if Any)	Training Given to the Employees	Attendance of Employees	Signature of Employees
11	Importance of CSR Activities.	ok.	1	1	1
12	Importance of cleaning and other eco- developmental activities in the entire plant and surrounding of plant premises.	ok.	/	/	/

	TRAINING GIV	EN BY
s. NO.	NAME	SIGNATURE
1	ABHISHEK GUPTA	CAR
2	SHBHAM GUPTA	Shubham.
3	ANMOL GUPTA	Annal hipto

EXHIBIT-XI















































EXHIBIT-XII

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

FORM - V

(See rule14)

Environmental Statement for the financial year ending the 31stMarch 2022 (FY-2021-2022)

$\underline{PART - A}$

1.	Name and address of the Owner/Occupier of the Industry, operation or process	:	RATI PUSHP 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 2021-2022)	:	4,19,567 /-

$\underline{PART} - \underline{B}$

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 (2021-22)
1	L- Base& D-Base	30 KL
2	Chloramphenicol Powder I.P	29 KL
3	Chloramphenicol Palmitate I.P.	24 KL
4	Domestic, Washing, Sanitization	450 KL
5.	Boiler, Cooling etc.	585 KL
6.	Gardening	1000 KL
	Total Water Consumption in FY 2021-2022	2118 KL

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 current financial year (2021-2022) in KG
1.	1. D- Base	S- Base	18500 Kg
2.	2. L- Base	Hydrochloric Acid (Hcl)	3211 Kg
3.	3. Chloramphenicol	Sodium Hydroxide (NaOH)	2926 Kg
4.	powder I.P. 4. Chloramphenicol	Methyl Dichloro Acetate	8306 Kg
5.	Palmitate I.P.	IsoPropyl Alcohol	11394 Kg
6.		Palmitoyl Chloride	696 Kg
7.		Acetone	2045 Kg
8.		Pyridine	279 Kg

 $\underline{PART-C}$

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	0.00	0.00	Plant is designed for zero discharge by adopting solar evaporation for treated water
	ETP)	Parameter	Results	by ETP.
		рН	7.44	All Parameters for treated
		Total suspended solids	44.0 mg/l	water are well within the limits.
		COD	106.0 mg/l	
		BOD	19.0 mg/l	
		Oil & Grease	4.0 mg/l	

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

L	A :	Do wo we of our	D ogs.l4	Doutioulete metters value on
b.	Air	Parameter	Result	Particulate matters value are
	(AmbientAir	Particulate Mtter (PM)	52.5 Mg/NM3	well within the prescribed
	Quality	, ,		limits stipulated by concerned
	Monitoring &	Oxide of Nitrogen (NO ₂)	42.0 Mg/NH3	regulatory authorities.
	Stack Emission	Sulphur Dioxide (SO ₂)	30.0 Mg/NM3	
	Monitoring)	Carbon Monoxide (CO)	0.0075 % by volume	

$\underline{PART} - \underline{D}$

Hazardous Wastes:

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

		Total Quantity (Kg.)
Sl. No.	Hazardous Waste	During the current financial year (2021-22)
a.	From Process	
(i)	ETP Sludge	191 Kg
(ii)	Spent corbon	NIL
b.	From Pollution Control facilities	NIL

$\underline{PART} - \underline{E}$

Solid Wastes:

		Total Quantity (Kg.)	
Sl.	Solid Waste	During the current financial	
No.		year	
		(2021-22)	
a.	From Process	Nil	
b.	From Pollution Control facilities	Nil	
c.	Quantity recycled or reutilized	Nil	

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

$\underline{PART-F}$

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	30Ltr	Sold to authorized Recycler.
2.	Used Grease	NIL	

Other Solid Waste:

Sl. No.	Description of Waste	Qty. of waste generated duringtheyear	Disposal Method
1	Scrap (Iron, steel, Aluminum	315 Kg	
	Etc.)		Sold to authorized vendor/Recyclers
2	Old & used I.T. materials	NIL	
3	Used HTPE Barrels and	860 Kg	
	Container, Polythenes etc.		

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.

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.

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

$\underline{PART} - \underline{I}$

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-XIII

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...../Parya/SEIAA/5667/2019

Date: 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:-

- 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.
- 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.
- 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).

Salient Features of the project as submitted by the project proponent:

SI. 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		



8	Water Requirement & Source	Existing: 2.02 KLD (ground water)
	1647)	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)
	HE TENNING CONTRACTOR DESCRIPTION OF THE SECOND	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
	25 3	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 1600 kg Boiler and approx 18 LPH Diesel for DG
11	Man Power/ Employment	Direct employment : 18 person
T. MINES	CTOCOTO-CTOVEN PRINCEDWANTEN COTO-ON	indirect employment: for 30 persons.
12	Solid and Hazardous Waste	Shall be disposed as per Norms

6. Area details:

5. 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	Nill Nil	0%
4	Parking Area	41	Nill Nil	035
5	Road & Open area	363	Nill Nil	0%
6	ETP TANK	26	Nill 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	50	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

Microbia Security

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
Washing of Pant Machinery and others	0.2	0.5	0.7	Proposed)
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 inhouse 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	
Muncipal 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:-

- 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.
- 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.
- Directions/suggestions given during public hearing and commitment made by the project proponent should be strictly complied.
- Since the proposed project falls in Critically Polluted Areas (CPAs), Severely Polluted Areas (SPAs) the
 provision of the mechanism farmed 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.
- 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.

- The project proponent shall submit within the next 3 months the details of solar power plant and solar electrification details within the project.
- The project proponent shall ensure to plant broad leave trees and their maintenance. The CPCB guidelines in this regard shall be followed.
- 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 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.
- 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.
- 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.
- SEIAA opined that the project proponent shall submit permission of CGWA or proposal for alternative source of fresh water.
- 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.
- Zero liquid discharge should be practiced.
- Statutory compliance:
 - The project proponent should obtain necessary permission from Drug Controller, Govt. of India, within time frame.
 - 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.
- 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.
- 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 SO_2 and NOx in reference to SO_2 and NOx 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.
- 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:

- 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.
- The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation.
- The ambient noise levels 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:

 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.

- 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.
 - 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:

 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:

- Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- 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. Preemployment 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:

- 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 approve by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements / deviation / violation of the environmental / forest / wildlife norms / conditions. The company shall have defined system of reporting infringements / deviation/ violation of the environmental/ forest / wildlife norms / conditions and / or shareholders / stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.
- 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.

Page 6 of 8

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

24. Miscellaneous:

- 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.
- 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, NOx (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

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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 in not a part of any no- development zone as required/prescribed/indentified 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.
- Advisor, IA Division, Ministry of Environment, Forests & Climate Change, Govt. of India, Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj, New Delhi.
- Additional Director, Regional Office, Ministry of Environment & Forests, (Central Region), Kendriya Bhawan, 5th Floor, Sector-H, Aliganj, Lucknow.
- 4. District Magistrate Muzaffarnagar.
- 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-XIV

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 handing 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-XV

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 coordinate 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.
- 1. 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 arises, the project management should immediate arrange for the assistance from professionals.

• Disaster Management Plan: On-Site Crisis

a. Identification of Personnel and Assessment of Responsibilities on specific functions of Cocoordinating 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