



**HEMMO PHARMACEUTICALS PVT.  
LTD.**

**Half – Yearly Compliance of  
stipulated Environmental  
Conditions/Safeguards in the  
Environmental Clearance API  
Manufacturing Plant at Plot C-43,  
Off Thane Belapur road TTC MIDC,  
Turbhe-Thane, Maharashtra.**

**July 2022 to December, 2022**



**ENVIRONMENTAL CLEARANCE SIX MONTHLY COMPLIANCE REPORT**

- 1. Project Type** : 5 (f) – Bulk drugs and intermediates  
Proposed Expansion of Existing Chemical Industry and
- 2. Name of the Project** : Addition of New Products unit by M/s. Hemmo Pharmaceuticals Pvt. Ltd.
- 3. Clearance letter and date** : **SEIAA-EC-0000001911**  
Dated: 31<sup>st</sup> July 2019
- 4. Location** : Plot C-43, Off Thane Belapur road TTC MIDC, Turbhe-Thane, Maharashtra
  - a. District** : Thane
  - b. State** : Maharashtra.
  - c. Latitude/Longitude** :  
Latitude : 19° 05' 07.59" N  
Longitude : 73° 01' 28.73" E
- 5. Address of correspondence** :  
**Mr. Haresh Ahuja**  
**(a) Address of concerned project Head** : **M/s. Hemmo Pharmaceuticals Pvt. Ltd.**  
Plot C-43, Off Thane Belapur road TTC MIDC, Turbhe-Thane, Maharashtra  
**(b) Address of Corporate Office** : **M/s. Hemmo Pharmaceuticals Pvt. Ltd.**  
Plot C-43, Off Thane Belapur road TTC MIDC, Turbhe-Thane, Maharashtra

## Project Background

M/s. Hemmo Pharmaceuticals Pvt. Ltd. is located at Plot C-43, Off Thane Belapur road TTC MIDC, Turbhe-Thane, Maharashtra. Industry has obtained Environmental Clearance **SEIAA-EC-0000001911 dated, 31st July 2019** attached as **Annexure 1** for manufacturing of "Synthetic Organic Chemicals Industry (dyes & dye intermediates; bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates). Production Capacity granted in Environmental Clearance for Oxytocin is 6Kg/M and for Other Peptides is 4Kg/M and in Consent to Operate under change in product mix for Oxytocin is 9 Kg/M OR Other Peptides 8.5 Kg/M

Project site is located in Turbhe MIDC hence; it is well connected with the entire basic infrastructure. NH 4 (AH 47) is located around 5.90km in East direction and Turbhe railway station is 1.25km in SW direction from the project site. As per the granted Environmental Clearance, total plot area of the project is 4631m<sup>2</sup> and total built-up area is 4474.14m<sup>2</sup>. Total cost of the project is Rs.61.5 Cr.

## Present Status

After obtaining Environmental Clearance, Industry had applied for the Consent to Establish on 23rd October 2019 vide MPCB-CONSENT-0000081879 same has been granted on 1<sup>st</sup> August 2020 vide format no. CC/UAN No.0000081879/CE- 2007000006. Industry has obtained its Amendment in Consent to Operate under Change in Product Mix no. CC/UAN No 0000103930/CO-2106001158 dated 24<sup>th</sup> June 2021 with increased production under change in product mix and water consumption as per MoEF Notification no. 2749 S.O. 3518(E) dt. 23.11.2016 and Circular of EIA notification dated 14th September 2006- Clarification regarding EIA Clearance for Change in Product-Mix.

**Specific Conditions:**

Sr. No.	Conditions	Status	Status of Compliance	Attached supporting
i	PP to make changes in the consolidated statement w.r.t water consumption, green belt area, rain water harvesting, use of solar energy, sewage treatment plant, list of trees and project cost in consonance with the EIA Report.	Complied	The changes in consolidated statement w.r.t water consumption, green belt area, rain water harvesting, use of solar energy, sewage treatment plant, list of trees and project cost in consonance with the EIA Report were made and submitted.	<ul style="list-style-type: none"> <li>Consolidated statement dated 07 Feb 2019 (Pg 15 to 20) (<b>Annexure 2</b>)</li> <li>Complied Compliance to <b>158<sup>th</sup> SEAC meeting</b> attached for ref. Pg 18 of 95 (<b>Annexure 3</b>)</li> </ul>
ii	PP to submit an affidavit for not violating any requirements of EIA Notification, 2006 amended from time to time.	Complied	Industry has submitted the affidavit for not violating any requirements of EIA Notification, 2006 amended from time to time.	Complied Compliance to <b>158<sup>th</sup> SEAC meeting</b> attached for ref. Pg 25 & 26 of 95 ( <b>Annexure 3</b> )
iii	PP to submit structural stability certificate with respect to the proposed BUA of 303.15sq.m. in the existing building considering load of proposed equipment's to be installed.	Complied	Industry has submitted the structural stability certificate with respect to the proposed BUA of 303.15sq.m. in the existing building considering load of proposed equipment's to be installed.	Complied Compliance to <b>158<sup>th</sup> SEAC meeting</b> attached for ref. Pg 27 of 95 ( <b>Annexure 3</b> )
iv	PP to explore possibility to optimize the process to reduce water consumption.	Complied	<ul style="list-style-type: none"> <li>Industry has explored options to reduce / optimize water requirement in each stage of manufacturing process.</li> <li>Industrial process water requirement is optimized from 59.59 to 56.92 CMD as per consent to operate under change in product mix.</li> </ul>	<ul style="list-style-type: none"> <li>Water optimization scenario analysis sheet (<b>Annexure 6</b>)</li> <li>CTO-2021 (<b>Annexure 7</b>)</li> </ul>
v	PP to submit revised material balance for each product showing consumption of raw material, water, sources of pollution, proposed mitigation measures to control the pollution along with justified use of resources.	Complied	Industry has submitted revised material balance for each product showing consumption of raw material, water, sources of pollution, proposed mitigation measures to control the pollution along with justified use of resources.	Complied Compliance to <b>158<sup>th</sup> SEAC meeting</b> attached for ref. Pg 20 & 21 ( <b>Annexure 3</b> )
vi	PP to include reasons for the parameters exceeding standard limits shown in the base line data monitoring.	Complied	<p><b>A. Ambient Noise</b></p> <ul style="list-style-type: none"> <li>Noise Level Monitoring: 14 locations</li> <li>Ambient noise level was exceeding at 4 locations</li> <li>High noise level was observed at Sanpada location due to the vehicular movement as location is Commercial complexes (D mart)</li> <li>- As Express way is in close vicinity, higher noise was observed at CBD Belapur</li> <li>- Noise level exceeded at</li> </ul>	Complied Compliance to 158 <sup>th</sup> SEAC meeting attached for ref. Pg 22 & 23 ( <b>Annexure 3</b> )

Sr. No.	Conditions	Status	Status of Compliance	Attached supporting
			<p>Khargar due to continues vehicle movement at nearer petrol pump &amp; service station</p> <ul style="list-style-type: none"> <li>Noise level exceeded at Indiranagar due to the noise generation from nearer Stone Quarry, Crushers &amp; Vehicular Movement</li> </ul> <p><b>A. Surface water</b></p> <ul style="list-style-type: none"> <li>Surface water monitoring: 11 locations</li> <li>All locations were found to have higher level of Total Coliform</li> <li>Observed monitoring values of all 11 samples were found within the limit except Coliform</li> <li>It was observed that activities like mixing of sewage, leakage from sewer line and washing of cloths etc. take place near the monitoring locations</li> <li>In case of DAKC, Turbhe, Bonkode, Juhu Village lakes &amp; Ganesh, Khairi, Ponds the locations was surrounded by slum area and some sewage from slum goes in to the lake water</li> <li>At Vasai &amp; Panvel Creek, activities such as dumping of solid waste, release of sewage etc. observed</li> </ul>	
vii	PP to submit their plan to utilize CER (Corporate Environment Responsibility) along with timelines as per OM issued by MoEF & CC dated 01.05.2018.	Complied	Industry has allotted 1% of the additional capital investment [Rs. 15 Cr] for CER activity i.e. 15 Lakhs. The CER plan is prepared in consultation with District Authorities as mentioned in the OM dated 01.05.2018.	Complied Compliance to 158 <sup>th</sup> SEAC meeting attached for ref. Pg 81 & 82 ( <b>Annexure 3</b> )
viii	PP to include water foot and carbon foot print monitoring in the EMP.	Complied	Industry has included water foot and carbon foot print monitoring in the EMP	Chapter 10.7 & 10.8 of EMP Refer Revised EIA report Pg 338 to 349 ( <b>Annexure 8</b> )
ix	PP to include above points in the EIA report and submit revised EIA/EMP report.		Industry has submitted revised EIA/EMP Report including all the above mentioned points on MPCB Portal on 21.02.2019	
x	PP to upload revised Form-II and EIA/EMP report.		Industry has uploaded revised Form II and EIA/EMP Report on MPCB Portal on 03.04.2019	<ul style="list-style-type: none"> <li>Revised Form II (<b>Annexure 9</b>)</li> <li>Screen shot showing upload details of EIA</li> </ul>

Sr. No.	Conditions	Status	Status of Compliance	Attached supporting
				& Form II (Annexure 10)
xi	PP to submit storm water drains and rain water harvesting calculations.	Complied	Industry has submitted storm water drains and rainwater harvesting calculations.	Complied compliance to 163 <sup>rd</sup> SEAC meeting Set 4 - Pg 52 – 55 (Annexure 4)
xii	PP to prepare and submit CER plan prepared in consultation with the District Collector as per OM issued by MoEF&CC dated 01.05.2018.	Complied	Industry has allotted 1% of the additional capital investment [Rs. 15Cr] for CER activity i.e. 15 Lakhs. The CER plan is prepared in consultation with District Authorities as mentioned in the OM dated 01.05.2018.	Complied compliance to 163 <sup>rd</sup> SEAC meeting Set 4 (Pg 56-57 of 72) (Annexure 4)
xiii	PP to implement their CER plan in consultation with the District Authority as per OM issued by MoEF&CC dated 01.05.2018.	To be complied	Industry shall implement the CER plan in consultation with District Authorities as mentioned in the OM dated 01.05.2018. However, Industry is awaiting the response from District Authorities	<ul style="list-style-type: none"> <li>Compliance assurance for 165<sup>th</sup> SEAC meeting Pg 2 (Annexure 5)</li> <li>Page 4-9 for 3 letters dated 06-12-2018, 20-02-2019 &amp; 05-03-2019, sent to District authority (Annexure 5)</li> </ul>
xiv	PP to monitor their water and carbon foot print in the Environmental Monitoring Plan.	Complied	Industry has conducted and submitted water foot and carbon foot print monitoring in the EMP	Compliance assurance for 165 <sup>th</sup> SEAC meeting Pg 2-3 of 10 (Annexure 5)
xv	PP to ensure strict implementation of all the recommendations of the HAZOP and Risk Assessment study.	Complied	Industry assures the strict implementation of all the recommendations of the HAZOP and Risk Assessment study.	Compliance assurance for 165 <sup>th</sup> SEAC meeting Pg 3 of 10 (Annexure 5)
xvi	PP to ensure to comply with the conditions stipulated in the Office Memorandum issued by MoEF & CC dated 9th August, 2018.	Complied	The compliance response of the conditions mentioned in Annexure XX of the O.M. dated 9.08.2018 is provided as an attachment	Compliance report of Annexure XX (Annexure 11)
xvii	PP to submit CER plan to District Collector and submit the acknowledgement to Member Secretary, SEIAA.	Complied	Industry shall implement the CER plan in consultation with District Authorities as mentioned in the OM dated 01.05.2018. However, Industry is awaiting the response from District Authorities	<ul style="list-style-type: none"> <li>Compliance assurance for 165<sup>th</sup> SEAC meeting Pg 2 (Annexure 5)</li> <li>Page 4-9 for 3 letters dated 06-12-2018, 20-02-2019 &amp; 05-03-2019, sent to District authority (Annexure 5)</li> </ul>

**General Conditions:**

Sr. No.	Conditions	Status	Project Proponent's Response / Compliance Status	Attached supporting
i	PP to achieve Zero Liquid Discharge; PP shall ensure that there is no increase in the effluent load to CETP.	Complied	Industry has ensured that there will be no increase in the effluent load to the CETP as mentioned in the granted EC copy. Treated ETP effluent parameters are well within the consented parameters limit. Disposal volume of treated effluent to CETP is also within the limit.	Monthly effluent sent to CETP (Spreadsheet) <b>(Annexure 17)</b>
ii	No additional land shall be used /acquired for any activity of the project without obtaining proper permission.	Complied	Industry has not used any additional land for any activity of the project	--
iii	PP to take utmost precaution for the health and safety of the people working in the unit as also for protecting the environment.	Complied	Industry has established the Occupational Health centre and conducts regular medical checkup.  Industry has ensured the engineering controls, conducted various safety awareness programs, & provided appropriate PPEs.  To protect the environment, industry has provided proper pollution control systems to control air emissions and treated effluent are well within prescribed norms as per CTO.	Site photographs showing Bi-annual medical health checkup  Site photos showing Safety training  Site photos showing Scrubbers  Site photos are in <b>(Annexure 22)</b>
iv	Proper Housekeeping programmes shall be implemented.	Complied	Good housekeeping is maintained within the premises.	Housekeeping program sheet <b>Annexure 18</b>
v	In the event of the failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved	Agreed	All the Pollution Control System are operated and maintained well but in case of any emergencies, Industry will put off the unit and will not restart the unit until the desired efficiency has been achieved.	
vi	A stack of adequate height based on DG set capacity shall be provided for control and dispersion of pollutant from DG set. (If applicable).	Complied	Industry has provided stack with adequate height for control and dispersion of pollutant from DG set (500KVA capacity)	Site photos showing DG set with stack <b>(Annexure 22)</b>

Sr. No.	Conditions	Status	Project Proponent's Response / Compliance Status	Attached supporting
vii	A detailed scheme for rainwater harvesting shall be prepared and implemented to recharge ground water.	Noted	The detailed scheme for rainwater harvesting has already been prepared and submitted in the EIA/EMP report. Ground recharge pits are not recommended as this is chemical manufacturing unit	
viii	Arrangement shall be made that effluent and storm water does not get mixed.	Complied	Industry has provided isolated lines for Effluent and storm water drainage system. Effluent line is connected to CETP. Storm water line is connected to MIDC storm water line	Plot plan showing Effluent + Storm water lines <b>Annexure 19</b>
ix	Periodic monitoring of ground water shall be undertaken and results analyzed to ascertain any change in the quality of water. Results shall be regularly submitted to the Maharashtra Pollution Control Board	Noted	Industry does not have any provision for extracting the ground water. Industry is consuming the water supplied by MIDC.	--
x	Noise level shall be maintained as per standards. For people working in the high noise area, requisite personal protective equipment like earplugs etc. shall be provided.	Complied	Noise levels in and around plant area are monitored and control measures are provided In addition to this, Industry has provided personal protective equipment's like earplugs etc. to the employees working in the high noise area.	Noise Monitoring report <b>Annexure 20</b>
xi	The overall noise levels in and around the plant are 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 shall confirm to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989.	Complied	Noise levels in and around plant area are monitored and control measures are provided.	Site photos showing acoustic enclosure of DG set ( <b>Annexure 22</b> )  + Noise Monitoring report ( <b>Annexure 20</b> )
xii	Green belt shall be developed & maintained around the plant periphery. Green Belt Development shall be carried out considering CPCB guidelines including selection of plant species and in consultation with the local DFO/ Agriculture Dept.	Noted	Industry has developed the Green Belt.	Site photos showing green belt ( <b>Annexure 22</b> )



Sr. No.	Conditions	Status	Project Proponent's Response / Compliance Status	Attached supporting
xiii	Adequate safety measures shall be provided to limit the risk zone within the plant boundary, in case of an accident. Leak detection devices shall also be installed at strategic places for early detection and warning	Complied	Industry has provided the adequate safety measures to limit the risk zone within the plant boundary, in case of an accident. In addition, Industry has installed multiple leak detection devices at strategic location	Site photos showing Leakage detectors <b>(Annexure 22)</b>
xiv	Occupational health surveillance of the workers shall be done on a regular basis and record maintained as per Factories Act.		Industry ensures occupational health surveillance of the workers on regular basis and records are maintained as per factories Act	Site photos showing bi-annual medical check up <b>(Annexure 22)</b>
xv	The company shall arrange for protection of possible fire hazards during manufacturing process in material handling.	Complied	Industry has provided the static charge dissipation through proper earthing of all equipment & solvent transfer systems. Industry has also installed fire hydrant, 100+ fire extinguishers etc. to prevent fire in worst case Scenario.	Site photos showing Fire hydrant pump room <b>(Annexure 22)</b>
xvi	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Waste (Management and Handling) Rules, 2003 (amended). Authorization from the MPCB shall be obtained for collections/ treatment/storage/disposal of hazardous wastes.	Complied	The generated hazardous waste is being stored and disposed as per Hazardous and Other Wastes (Management and Trans boundary Movement) Rules, 2016 (Amended). In addition, Industry has obtained CTO authorization from MPCB for storage and disposal of hazardous wastes.	Site photos showing hazardous waste yard <b>(Annexure 22)</b>
xvii	Regular mock drills for the on-site emergency management plan shall be carried out. Implementation of changes / improvements required, if any, in the on-site management plan shall be ensured.	Complied	Industry carries out regular mock drills for on-site emergency management plan	Mock drill report <b>(Annexure 21)</b>
xviii	A separate environment management cell with qualified staff shall be set up for implementation of the stipulated environmental safeguards.	Complied	There is a separate environmental cell with qualified personal under the control of senior Executive, he reports to head of EHS department.	-

Sr. No.	Conditions	Status	Project Proponent's Response / Compliance Status	Attached supporting
xix	Separate funds shall be allocated for implementation of environmental protection measures/EMP along with item-wise breaks-up. These cost shall be included as part of the project cost. The funds earmarked for the Environment protection measures shall not be diverted for other purposes and year-wise expenditure should reported to the MPCB & this department	Noted	Separate funds have been allocated towards EMP.	Newspaper and website public notice for EC <b>(Annexure 14)</b>
xx	The project management shall advertise at least in two local newspapers widely circulated in the region around the project, one of which shall be in the marathi language of the local concerned within seven days of issue of this letter, informing that the project has been accorded environmental clearance and copies of clearance letter are available with the Maharashtra Pollution Control Board and may also be seen at Website at <a href="http://ec.maharashtra.gov.in">http://ec.maharashtra.gov.in</a>	Noted	Industry has advertised in two local newspapers in two languages [English & Marathi] that the project has been accorded Environmental Clearance. Industry has also displayed the copy of the EC Letter on the company's website,	Scanned copy of Newspaper, website public notice, and Regd AD to MPCB & NMMC for EC <b>(Annexure 14)</b>
xxi	Project management should submit half yearly compliance reports in respect of the stipulated prior environment clearance terms and conditions in hard & soft copies to the MPCB & this department, on 1 <sup>st</sup> June & 1 <sup>st</sup> December of each calendar year.	Complied	Industry submits six-monthly reports on the status of the compliance of the stipulated environmental conditions	-
xxii	A copy of the clearance letter shall be sent by proponent to the concerned Municipal Corporation and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website of the Company by the proponent.	Complied	Industry has sent the copy of clearance letter to the SRO, MPCB and NMMC	Scanned copy of Newspaper, website public notice, and Regd AD to MPCB & NMMC for EC <b>(Annexure 14)</b>

Sr. No.	Conditions	Status	Project Proponent's Response / Compliance Status	Attached supporting
xxiii	The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their 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 the SPCB. The criteria pollutant levels namely; SPM, RSPM, SO <sub>2</sub> , NO <sub>x</sub> (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	Complied	Industry has uploaded the status of the compliance of the stipulated EC conditions including results of monitored data on the company website and submitted to MoEF with CC to MPCB. Industry displays criteria pollutants levels namely SPM, RSPM, SO <sub>2</sub> , NO <sub>x</sub> through electronic display near main gate of the company.	Site photos showing Electronic display for public <b>(Annexure 22)</b>
xxiv	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB.	Complied	Industry has submitted the status of the compliance of the stipulated EC conditions including results of monitored data to MoEF with CC to MPCB	
xxv	The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the respective Regional Offices of MoEF by e-mail.	Complied	Industry had submitted the Environmental Statement Report (Form V) for the financial 2021-22 to MPCB	Form V – Environment statement for FY 21-22 <b>(Annexure 16)</b>

**LIST OF ANNEXURES**

<b>Annexure</b>	<b>Particulars</b>
1.	Environmental Clearance Copy (EC 2019)
2.	Consolidated statement dated 07 Feb 2019 with covering letter
3.	Complied Compliance to 158th SEAC specific conditions
4.	Complied Compliance to 163rd SEAC specific conditions
5.	Complied Compliance to 165th SEAC specific conditions
6.	Water optimization scenario analysis sheet
7.	Consent to Operate from SPCB (CTO) & Consent to Establish (CTE)
8.	Revised EIA Report
9.	Revised Form II
10.	Screen shot showing upload details of EIA & Form II
11.	Compliance report of Annexure XX - Standard EC Condition for Pharmaceutical
12.	Hazardous Waste disposal authorization - TTCWMA Membership
13.	PESO Solvent License
14.	Newspaper advertisement copy regarding grant of EC
15.	EHS Policy
16.	Form V - Environment statement FY21-22
17.	Treated Effluent to CETP record
18.	House Keeping Program Worksheet
19.	Plot Plan Showing Storm water & Effluent Lines
20.	Noise Monitoring Report
21.	Mock Drill Report
22.	Site Photographs
23.	Stack Monitoring Reports