

APL/CDL/TNPCB/16/2026-27

29th May 2026

To

Dr. V George Jenner, IFS
Deputy Director General of Forests (C),
Ministry of Environment, Forest and Climate Change,
Regional Office, I st Floor, Additional Office Block for GPOA,
Shastri Bhawan Haddows Road, Nungambakkam,
Chennai -600006

Subject: Submission of Half yearly compliance report to the Conditions stipulated in the Environmental Clearance for Asian Paints Limited, Penta Division located at B-5 To B-10, Sipcot Industrial Complex, Kudikadu Village, Cuddalore, Tamil Nadu-607005.

Respected Sir,

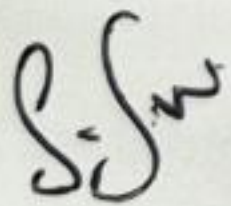
In accordance with our environmental clearance general condition, which states, "The project proponent shall also upload/submit six monthly reports on PARIVESH Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC. We hereby submitting half yearly compliance report for the period of October 2025 - March 2026.

We assure you that we are committed to continuous improvement in all our activities towards environmental protection & management.

Thanking you,

Yours faithfully,

For **ASIAN PAINTS LIMITED**



S Saravanan

Manager – QA & EHS





THIRU A.V. VENKATACHALAM, I.F.S
MEMBER SECRETARY

STATE LEVEL ENVIRONMENT IMPACT
ASSESSMENT AUTHORITY – TAMIL NADU

3rd Floor, Panagal Maaligai,
No.1 Jeenis Road, Saidapet,
Chennai-15.

Phone No.044-24359973

Fax No. 044-24359975

ENVIRONMENTAL CLEARANCE (EC)

Letter No. SEIAA/TN/F. 6495/5(I)/EC - 60/2018 dated: 24.04.2018.

To

The General Works Manger
Asian Paints Limited
Penta Division
B5-B10, Sipcot Industrial Complex,
Kudikadu Village,
Cuddalore – 607005.

Sir,

Sub: SEIAA -TN –Environmental Clearance-Expansion in production of Pentaerythritol and Sodium Formate by M/s. Asian Paints Limited in their existing plant at Plot No. B5 – B 10, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore, Tamil Nadu - Category - "B1" and Schedule 5(f)-Synthetic Organic Chemical Industry (Dyes and Dye Intermediate) under the EIA Notification, 2006–Issued-Regarding.

- Ref: 1. ToR issued by MoEF&CC F.No.J-11011/181/2017-IA-II(I) dated 21.12.2017.
2. EIA report submitted for Environment Clearances dated: 25.01.2018.
3. Lr. No.SEIAA-TN/F.No. 6495/2018 dated: 08.02.2018.
4. Proponent reply letter dated 14.02.2018.



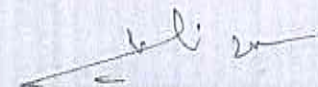
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5. Minutes of the 103rd SEAC meeting held on 24.02.2018.
6. Minutes of the 104th SEAC meeting held on 19.03.2018.
7. Lr. No.SEIAA-TN/F.No. 6495/SEAC/2018 dated: 22.03.2018.
8. Proponent reply letter dated 05.04.2018.
9. Minutes of the 286th SEIAA meeting held on 16.04.2018.
10. Proponent reply letter dated 20.04.2018.
11. Minutes of the 290th SEIAA meeting held on 23.04.2018.
12. Minutes of the 291st SEIAA meeting held on 24.04.2018.

1. This has reference to your application dated 25.01.2018 and subsequent communication on the above mentioned subject by M/s. Asian Paints Limited for Expansion in production of Pentaerythritol and Sodium Formate in their existing unit for obtaining Environmental Clearance for the proposed Expansion in production of Pentaerythritol from 560 MTM to 730 MTM (Powder and Solution form) and Sodium Formate from 336 MTM to 480 MTM (Powder and Solution form) at Plot No. B5 – B 10, SIPCOT Industrial Complex, Cuddalore, Tamil Nadu under Item No. 5(f) – ‘ Synthetic Organic chemicals Industry (dyes & dyes intermediate; bulk drugs and intermediates excluding drug formulation; Synthetic rubbers; basic Organic Chemicals, other synthetic organic chemicals and chemical intermediates (located in a notified industrial area/estate) &Category ‘B1’ of the Schedule to the EIA Notification, 2006.
2. The Proponent, M/s. Asian Paints Limited, has applied to MoEF& CC, GoI, for Terms of Reference for the proposed Expansion in production of Pentaerythritol from 560 MTM to



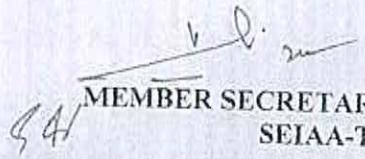

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- 730 MTM (Powder and Solution form) and Sodium Formate from 336 MTM to 480 MTM (Powder and Solution form) at Plot No. B5 – B 10, SIPCOT Industrial Complex, Cuddalore, Tamil Nadu.
3. In response to the application, Terms of Reference (ToR) was issued vide File. No. J-11011/181/2017-IA-II (I) dated: 21.12.2017 by MoEF& CC. Public hearing was exempted as per section 7(i), (iii) stage (3), Para (i)(b) of EIA Notification, 2006, and request to submit the EIA/EMP report to the SEIAA for grant of Environment Clearance.
 4. Based on the ToR issued by the MoEF& CC, the proponent prepared the EIA report and submitted the same to SEIAA on 25.01.2018. The proposal (EIA report) was placed in the 103rd meeting of the SEAC held on 24.02.2018. Accordingly, the SEAC decided to make an inspection and based on the outcome of the inspection, SEAC will take a decision regarding the grant of EC to the industry. The technical team inspected the site on 03.03.2018 and submitted a report on 12.03.2018. The technical team, based on the site inspection and discussion with the proponent at the site has requested the proponent to furnish additional particulars/proposals. Accordingly, the proponent has submitted the additional particulars/proposals to the technical team on 12.03.2018. After the perusal of the additional particulars/proposals, the inspection report was placed in the 104th Meeting of SEAC held on 19.03.2018. Based on the recommendations of the technical team, the SEAC decided to recommend the proposal for the grant of Environmental Clearance to SEIAA – TN subject to certain conditions.
 5. The subject was placed before 286th SEIAA Meeting held on 16.04.2018. The Authority called for certain additional details and the proponent has submitted the additional




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particulars/proposals to the SEIAA on 05.04.2018 and SEIAA after careful consideration decided to issue Environmental Clearance in its 291th meeting held on 24.04.2018 vide Item No. 291-01 subject to terms and conditions stipulated under the provisions of Environment Impact Assessment Notification, 2006 as amended based on the Information submitted by you which are extracted below:

1	(i) Name of the Project: (ii) Date of Application:	(i) Proposed Expansion in production of Pentaerythritol from 560 MTM to 730 MTM (Powder and Solution form) and Sodium Formate from 336 MTM to 480 MTM (Powder and Solution form) at Plot No. B5 – B 10, SIPCOT Industrial Complex, Cuddalore, Tamil Nadu by M/s. Asian Paints Limited (ii) 25.01.2018.
2	Name of Sector: Schedule No(in the EIA Notification,2006)	Schedule S.No. 5(f) of Category "B1" – Synthetic Organic chemicals Industry (dyes & dyes intermediate; bulk drugs and intermediates excluding drug formulation; Synthetic rubbers; basic Organic Chemicals, other synthetic organic chemicals and chemical intermediates (located in a notified industrial area/estate).
3.	New Project/ Expansion	Expansion
4	Name of the Applicant/Project Proponent	M/s. Asian Paints Limited
	(i) Project	Plot No. B5 – B 10, SIPCOT Industrial Complex, Kudikaddu




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5		Village, Cuddalore, Tamil Nadu	
	(ii) Co-ordinates (lat-long) of all four corners of the site	11040°58.66''N, 79045°07.07''E 11040°52.60''N, 79045°04.98''E 11040°50.07''N, 79045°12.15''E 11040°56.01''N, 79045°14.26''E	
	(iii) Whether any GO attracted	No.	
6	(i)Area of the Site(in Hectares)	29.2 acres (11.8 Ha) (No Additional land is required for the proposed expansion)	
	(ii)Land use are(in Ha)	Total Land Area	29.2 acres (11.8 Ha)
		Plotted industrial area	5.6 acres (2.27 Ha)
		Green belt area	15.7 acres (6.35 Ha)
		Roads	2.6 acres (1.05 Ha)
		Lawn and garden	5.3 acres (2.14 Ha)
8	Land use Classification as per Record	Industrial area - SIPCOT Industrial Estate.	
9	TOR issued? (If yes then	Yes. Terms of Reference (ToR) was issued vide File. No. J-	



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	specify the details)	11011/181/2017-IA-II (I) dated: 21.12.2017 by MoEF& CC. Public hearing was exempted as per section 7(i), (iii) stage (3), Para (i)(b) of EIA Notification, 2006, and request to submit the EIA/EMP report to the SEIAA for grant of Environment Clearance.		
10	Project Cost (after expansion)	Rs. 4.8 Crores		
11	Distance from Protected areas Areas/Critically Polluted areas/Eco-Sensitive areas/Inter-State Boundaries.	Cuddalore industrial area has been notified by CPCB as critically polluted area and moratorium was imposed. However, due to various action implemented by SPCB , the moratorium in this area has been lifted based on the office memorandum vide letter number J-11013/5/2010-IA.II(I) dated 25.11.2016 by MoEF& CC		
12.	Production Details	Products manufactured (In Powder & Solution Form)	Existing production TPM	Production after expansion TPM
		Pentaerythritol	560	730
		Sodium Formate	336	480
13	Manufacturing Process	The increase in production capacity is envisaged through, Process Modification, Process Automation, Reliability Improvement, Debottlenecking Activities.		



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	The reactor is the heart of the plant where Pentaerythritol is formed. The reaction is a batch process. Pentaerythritol is produced in a reactor by the reaction of calculated quantity of Formaldehyde, Acetaldehyde and Caustic Soda Lye in water. The mole ratio of Formaldehyde to Acetaldehyde determines the composition of the Pentaerythritol. The mole ratio of Caustic to Acetaldehyde determines the quantity of Sodium Formate formed. Also, Caustic Soda Lye acts as a Catalyst for the reaction. The reaction is the Aldol condensation of Aldehydes and Cannizaro reaction. The reaction is carried out in dilute phase with very high excess presence of water. Initially, a predetermined quantity of known strength of Formaldehyde solution in water is prepared in the reactor. This solution is cooled to 20 deg. C and predetermined quantity of Acetaldehyde and Caustic are added over a period of 38 minutes. The reaction being exothermic, the temperature is controlled to reach a value of 45 to 48 deg. C during the reaction period of 38 minutes. Pentaerythritol, Di Pentaerythritol and Sodium Formate is formed along with small quantity of Formals. The entire reaction takes place in aqueous environment. After completion of reaction the excess 85% water present along with the product is removed through various unit operations viz. Stripping, Multiple effect Evaporation, Crystallization,
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	purification, separation and drying. The reactor product is fed to the stripper to remove the traces of un-reacted Methanol & Formaldehyde present in the process stream for recovery and reuse. The stripper product is then fed continuously to the five-effect evaporator where the Concentration is increased upto 60%. The water evaporated from Evaporator is reused in the process. The concentrated mixture is then fed to Crude Vacuum Crystallizer which causes the Pentaerythritol (PE) product to crystallize and precipitate, keeping the Sodium Formate in liquid form. Subsequent to filtration in Crude Belt filter, the precipitated PE is separated from the filtrate Crude Mother Liquor (CML) containing the bulk of Sodium Formate. The PE cake is re-slurried and re-dissolved. The PE solution is then passed through the deionizer in order to reduce the Sodium Formate slippages and through Carbon column for color removal. This solution is stored in a tank called Pure Pentaerythritol Solution Tank. Depending on the grade to be manufactured, the solution is then transferred either to the Pure Vacuum Crystallizer or to the Tech Dissolver in the Mono and Di Pentaerythritol section of the plant. Sodium Formate: The filtrate from Crude Belt Filter (CBF) is stored in a Tank and fed continuously to the Sodium Formate Evaporator cum
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		Crystallizer. The Sodium Formate crystals formed are further separated from their mother liquor by centrifuging and are dried and packed in solid or liquid form. Sodium Formate is a byproduct and based on the Caustic input to reaction for every MT of Pentaerythritol produced, 0.60 to 0.67 MT of Sodium Formate gets produced.																																				
14	Man-power Requirement(after expansion)	140Nos.																																				
15	Total Water Requirement - 857 KLD (after expansion) Raw water from SIPCOT - 690 KLD Treated water - 167 KLD	<table> <tr> <th>S. No</th><th>Activity</th><th>Quantity (KLD)</th></tr> <tr> <td>1.</td><td>Domestic</td><td>45</td></tr> <tr> <td>2.</td><td>Gardening</td><td>40</td></tr> <tr> <td>3.</td><td>Coal/ vegetation wetting</td><td>32</td></tr> <tr> <td>4.</td><td>FH make up</td><td>14</td></tr> <tr> <td>5.</td><td>WTP back wash</td><td>20</td></tr> <tr> <td>6.</td><td>Cooling tower</td><td>353</td></tr> <tr> <td>7.</td><td>Process</td><td>17</td></tr> <tr> <td>8.</td><td>fan less cooling tower</td><td>39</td></tr> <tr> <td>9.</td><td>Floor washing</td><td>21</td></tr> <tr> <td>10.</td><td>Boiler</td><td>270</td></tr> <tr> <td>11.</td><td>WTP Regenerator</td><td>6</td></tr> </table> Source of water - SIPCOT	S. No	Activity	Quantity (KLD)	1.	Domestic	45	2.	Gardening	40	3.	Coal/ vegetation wetting	32	4.	FH make up	14	5.	WTP back wash	20	6.	Cooling tower	353	7.	Process	17	8.	fan less cooling tower	39	9.	Floor washing	21	10.	Boiler	270	11.	WTP Regenerator	6
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16	Sewage generation and treatment	Sewage Generation -45 KLD, treated in the STP of 50 KLD capacity and the treated sewage is used for gardening																																				
17	ETP Details	- ETP Capacity 250 KLD. - Total Effluent generation - 131 KLD.																																				



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17A	Reuse of treated effluent	Treated effluent of 124 KLD is recycled in process			
18	Solid waste Management	Name of process	Expected quantity (Kg/annum)	Activities for which Authorization is issued	
		Ion Exchange resin	9600	authorized co processors to be sought for reuse/ recycle of solid wastes	
		Used insulation materials	4100		
		Used HDPE bags	5200		
		Used Filter Clothes	3000		
		Hazardous waste management			
		Spent carbon	7780 kg/annum	Authorized waste processing agency	
		Used spent oil	900 Lts/annum	Authorized waste processing agency	
		Waste oil	300 Lts/annum	Authorized waste processing agency	
		Sludge	172Tons/annum	TSDF	
				Gummidipoondi	
19	Stack emission Details: (All the stacks attached to process units, Boilers, D.G. Sets, (kg/hr)	S. No	Source of Emission	Control Measures	Height
		I	Sodium Formate Drier	wet scrubber followed by stack and the scrubbing medium: water	18m x dia 0.10m



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		2	Mono Pentaerythritol Drier	wet scrubber followed by stack and the scrubbing medium water	12m x dia 0.20m
		3	Di Pentaerythritol drier	wet scrubber followed by stack and the scrubbing medium: water	18m x dia 0.25m
		4	Tech Pentaerythritol Drier	Reverse pulse jet bag filter that collects dust followed by stack	Height 10.5m x dia 0.10m
		5	14 TPH FBC Boiler	Reverse pulse jet bag filter	Height 50m x dia 1.20m
		6	16 TPH FBC Boiler	Reverse pulse jet bag filter	42 m x dia 1.10m
		7	500 KVA DG set	Stack	12m x dia 0.25m
		8	600 KVA DG set	Stack	12m x dia 0.25m
20	Details of Fuel to be used:	S.No.	Boiler / DG set	Fuel consumption	Fuel type
		1	Coal Fired Boiler	111.50 T/day	Coal
		2	DG Sets	4.5KL/day	HSD
21	Steam Generation	16 TPH		30 TPH	



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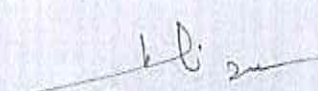
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22	Storm Water Management	There is adequate storm drainage system. The storm water in the project area will be collected through existing storm water drains. The excess storm water will be connected to the SIPCOT main storm water drain
23	Rain Water Harvesting	Rainwater harvesting storage capacity is 200cu.m.
24	Green Belt Development	15.7 acres (6.35 Ha)
25	CSR details	The actual CSR funds utilized in future should be atleast be 2% of the annual profit but not less than Rs. 33.60 lakhs per annum.
26	EMP Cost(O&M)	Capital Cost: 576 Lakhs. Operation and Maintenance Cost: 23.6 Lakhs.

Validity:

The SEIAA hereby accords Environmental Clearance to the above project under the provisions of EIA Notification dated 14th September, 2006 as amended, with validity for Seven years from the date of issue of EC, subject to the compliance of the terms and conditions stipulated below:




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(A) SPECIFIC CONDITIONS:

- (i) It is mandatory for the project proponent to furnish to the SEIAA, Half yearly compliance report in hard and soft copies on 1st June and 1st December of each calendar year in respect of the conditions stipulated in the prior Environmental clearance issued.
- (ii) "Consent for Establishment" shall be obtained from Tamil Nadu Pollution Control Board and a copy of the same shall be furnished to the SEIAA, Tamil Nadu before start of project construction activity at the site.
- (iii) The implementation of Environmental Management Plan in regard to treatment and disposal of sewage & Effluent, Solid waste Management, Hazardous - Waste Management, and CSR Activities should be carried out, as proposed and committed. Regular monitoring should be carried out during operation phases.
- (iv) The residue collected from the evaporator shall be documented by maintaining proper register and it should be made available at the time of inspection.
- (v) Adequate dust extraction system such as Ducting with dust extracting arrangement wherever required shall be established to achieve Occupational -health standards and ambient air quality standards.
- (vi) The proponent shall carryout best housekeeping practices as spillage management for handling and maintenance of raw materials and products inside the unit premises.
- (vii) Nature of chemicals Handled, the Do and Don'ts shall be displayed at all vital locations as laid down in MSDS.
- (viii) The proponent shall ensure that the quantity of Hazardous Waste handed over to the TSDF shall match with the quantity generated.




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- (ix) The proponent shall provide a separate closed area earmarked for storing solid waste including Hazardous Waste as proposed.
- (x) The proponent shall dispose Hazardous Waste generated as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Spent oil from D.G sets should be stored in HDPE drums in an isolated covered facility and disposed off through TNPCB registered recyclers.
- (xi) The Plastic wastes shall be segregated and disposed as per the provisions of Plastic Waste (Management & Handling) Rules 2016.
- (xii) The e - waste generated should be collected and disposed to a nearby authorized e-waste centre as per e waste (Management & Handling), Rules 2016 as amended.
- (xiii) The Municipal solid waste generated shall be collected, segregated and disposed as per Solid Waste Management Rules, 2016.
- (xiv) The industry shall conduct air sampling at least once in six months for the general core parameters (PM_{10} , $PM_{2.5}$, SO_x , NO_x) through TNPCB/NABL Accredited Laboratory and maintain records of the same and it should be made available at the time of inspection.
- (xv) Regular monitoring on the air quality, water quality and noise on the selected locations in and around the project site as mentioned in the EMP report for creating base line data shall be continued and records shall be maintained.
- (xvi) A separate environment and safety management cell with qualified staff shall be set up before establishment of the facility and shall be retained throughout the lifetime of the industry, for implementation of the stipulated environmental safeguards.

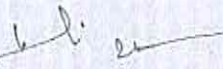



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- (xvii) The Green belt area already developed within the project area shall be properly maintained.
- (xviii) The industry shall promote tree plantation to neutralize their carbon foot print. The industry shall engage regularly in afforestation programme.
- (xix) The proponent shall ensure effective risk management strategy regarding confined space management to avoid risk while handling raw materials, products in the process area and storage.
- (xx) The industry shall conduct air sampling at least twice in a week (104 times in a year), as stipulated under EP Act 1986.
- (xxi) Risk cum disaster management plan should be in placed in the industry premises at all time.
- (xxii) Water conservation scheme including rain water harvesting measures to augment ground water resources shall be implemented so as to collect and reuse the entire rainwater harvested as a supplement to fresh water.
- (xxiii) The natural drainage pattern in the project area shall be maintained and storm water drain along the boundary and appropriate places shall be provided considering the Catchment area and maximum intensity of rainfall to collect runoff water/rain water for proper disposal to avoid flooding around the premises.
- (xxiv) The Environmental Clearance is issued without prejudice to any order that may be passed by the Hon'ble NGT/ Honb'le High Court of Madras.
- (xxv) All the assurances given in EIA and EMP shall be adhered to strictly.



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- (xxvi) Detail study shall be carried out by engaging accredited agencies / reputed institutions for Risk management and detailed Disaster management plan prepared for compliance.
- (xxvii) Sufficient funds should be provided for Disaster management.
- (xxviii) The Project Proponent shall provide disinfection by UV system for the sewage treatment plant for treating the sewage before applying on land for gardening.
- (xxix) The project proponent has to provide close loop silo for ash handling and the same shall be installed before 30.05.2016 as committed and submit the proof to SEIAA-TN.
- (xxx) The project proponent shall provide sufficient ventilation (air circulation) in the hazardous waste storage yard where the hazardous waste like spent carbon, Chemical sludge, used or spent oil are being kept.
- (xxxi) The industry should completely revamp fly ash collection from the source, conveyance, storage and disposal in a more scientific manner and to reduce the fugitive emissions in fly ash handling. The final disposal of the fly ash will be as per MoEF & CC Notification S.O. 254 (E) dated: 25th January, 2016.
- (xxxii) The Project Proponent shall carry out safety audit in the different operating zones of the plant at least once in a year and the same shall be considered as base for reviewing the unsafe conditions during the plant safety meeting.
- (xxxiii) The Project Proponent shall prepare a code of practice for safe operation for educating the safety standards to the work force deployed in the plant through appropriate training by the concerned experts.
- (xxxiv) As the plant operation involves the sensitive processing, the medical officer and the supporting staff involved in the health centre activities shall be trained in occupational




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health surveillance (OHS) aspects through the outsourced training from the experts available in the field of OHS for ensuring the health standard of persons employed.

- (xxxv) The Activity of the industry should no way pollute water bodies such as Uppanar River, Perumal Lake & Bay of Bengal.
- (xxxvi) The Activity of the industry should not impact on agricultural, irrigation system and mangroves surrounding the area.
- (xxxvii) The EMP cost of Rs.576 lakhs and operation and maintenance cost Rs. 23.6 lakhs shall be deposited in a nationalized bank by opening separate account and the head wise expenses statement shall be submitted to TNPCB with a copy to SEIAA annually.
- (xxxviii) There should be no threat to Bio diversity due to the operation of the industry.
- (xxxix) The flora & fauna present in and around the project site should be get affected due to the activity as reported.
- (xl) The Project Proponent has to provide rain water harvesting collection tank to the capacity of 200cu.m in order to recover and reuse the rain water during normal rains.
- (xli) The operation of the activity should not impact on the soil, micro flora & Fauna present in and around the project site.
- (xlii) The project proponent shall carry out risk assessment process for all the operations involved in the plant and a suitable risk management plan showing the contours of sensitive zones should be prepared.
- (xliii) The industry shall develop green belt in the open areas by planting the following species in future:
- (i) Calophyllum inophyllum-Pungan
 - (ii) Syzygium cumini- Naval





- (iii) *Thespesia populnea*- Poovarasu
 - (iv) *Terminalia arjuna*- Neermarudu
 - (v) *Ficus bengalensis* – Alamaram
 - (vi) *Ficus retusa*- Atthi
 - (vii) *Ficus bengalensis*- Arasamaram
 - (viii) *Alstonia scholaris*- Palai
 - (ix) *Mimusops elengi*- Mahilam
 - (x) *Madhuca longifolia*-Izhupai
- (xliv) The project proponent shall take up better housekeeping measures including scraps disposal and up keeping the machineries, pipes, etc.
- (xlv) The proponent should continuously monitor the VOC and ensure that VOC levels are within permissible limits.
- (xlv) Air pollution control – there are four sources of air emissions within the industry process
- Tech PE drier, Sodium formate drier, Mono PE drier and Di PE drier.
- From the Tech PE drier, particulates of Pentaerythritol will be emanating which will be controlled in a bag filter and finally emitted to the environment through a stack. There will be increase in the pollutant load from 1.33 kgs / day to 1.72 kgs/day and hence, additional bag filter capacity should be created.
 - From the Sodium formate drier, suspended particulate matter will be emitted which is sent to wet scrubber and then to the stack. The existing scrubber should be replaced with a new one.




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- From both Mono PE drier and Di PE drier, SPM will be emitted which is sent to wet scrubber and then to stacks. There is an increase in the amount of pollutant but the proponent should increase the efficiency of the scrubber to absorb the additional pollutant load.

(xivii) The project proponent has to provide/ install the following before 30.04.2018 as committed and furnish proof of the same to SEIAA-TN :

- The Sewage sludge bed capacity should be increased from 5.27 m³ to 10.5 m³ .
- The sludge drying bed 2. Nos should be provided in addition to the existing Sludge drying bed for managing sludge .
- The agreement with hazardous waste management and disposal facilities shall be made including the quantum of hazardous waste and the life period.

(B) GENERAL CONDITIONS:-

- i. This Environmental Clearance shall not be cited to relax any other rules applicable to this project.
- ii. The Project Proponent should advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the Environmental Clearance informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with TNPCB and also at the Website of the SEIAA, TN at <http://www.seiaa.tn.gov.in>.
- iii. A copy of the Environmental Clearance shall be sent by the project proponent to concerned local body and local NGO, if any from whom suggestions/representatives, if any were received while processing the proposal.




MEMBER SECRETARY
SEIAA-TN



- iv. The Environmental Clearance shall also be put on the website of the company.
- v. No expansion or modernization in the project shall be carried out without prior approval of the SEIAA-TN. In case of any deviations or alterations in the project proposal from those submitted to this Authority for clearance, a fresh reference shall be made to the SEIAA-TN to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
- vi. All the environmental protection measures and safeguards as recommended in the EIA report shall be complied with.
- vii. The implementation of the project vis-à-vis environmental action plans shall be monitored by the Regional office of MoEF& CC at Chennai, TNPCB and CPCB. A six monthly compliance status report shall be submitted to monitoring agencies regularly.
- viii. Data on ambient air, stack and fugitive emissions shall be regularly submitted online to the Regional office of MoEF&CC,GOI, at Chennai, TNPCB and Central Pollution Control Board as well as hard copy once in six months and display data on RSPM, SO₂ and NO_x outside the premises at the appropriate place for the general public.
- ix. Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- x. Proper house-keeping and cleanliness must be maintained within and outside the plant.
- xi. Occupational health surveillance programme shall be undertaken as regular exercise for all the employees, especially for those engaged in handling hazardous substances. The first aid facilities in the occupational health centre shall be strengthened and the medical records of each employee should be maintained separately.





- xii. The overall noise levels in and around the plant area shall be kept well within the standards prescribed for 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 EPA Rules, 1989 viz. 75dBA (day time) and 70 dBA (night time).
- xiii. The actual CSR funds utilized in future should atleast be 2% of the annual profit but not less than Rs. 33.60 lakhs per annum.
- xiv. A separate Environmental Management Cell equipped with full fledged laboratory facilities to carry out the various Environmental Management and Monitoring functions shall be set up under the control of a Senior Executive.
- xv. The requisite amount earmarked towards capital cost and recurring cost/annum for implementing pollution control measures shall be used judiciously to implement the Environment Management Plan as furnished in the EIA report. The funds so provided shall not be diverted for any other purposes.
- xvi. The project proponent shall upload the status of compliance of the stipulated environmental clearance 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 the MOEF&CC,GOI at Chennai, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; RSPM, SO₂, NO_x (ambient levels as well as stack emissions) or critical sector parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.



[Signature]
MEMBER SECRETARY
SEIAA-TN



- xvii. The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental conditions and shall also be sent to the respective Regional Offices of the MOEF by e-mail.
- xviii. The Environmental Clearance is valid for 7 years from the date of issue.
- xix. Environmental Clearance is being issued without prejudice to the action initiated under Environment (Protection) Act, 1986 or any court case pending or any other court order shall prevail.
- xx. The SEIAA, TN may alter/modify the above conditions or stipulate any further condition in the interest of environment protection.
- xxi. The SEIAA/SEAC or any Competent Authority may suitably add any further condition(s) on receiving reports from the project authority. The above condition shall be monitored by the Regional Office of MoEF located at Chennai.
- xxii. The SEIAA, TN may revoke or suspend the Environmental clearance, if implementation of any of the above conditions is not satisfactory.
- xxiii. The SEIAA, TN may cancel the environmental clearance granted to this project under the provisions of EIA Notification, 2006, if, at any stage of the validity of this environmental clearance, if it is found or if it comes to the knowledge of this SEIAA, TN that the project proponent has deliberately concealed and/or submitted false or misleading information or inadequate data for obtaining the environmental clearance.




MEMBER SECRETARY
SEIAA-TN



STATE LEVEL ENVIRONMENTAL IMPACT ASSESSMENT AUTHORITY-TN | 2018

- xxiv. Failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.
- xxv. The SEIAA-TN reserves the right to stipulate additional conditions if found necessary. The industry in a time bound manner shall implement these conditions.
- xxvi. The above conditions will 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, the Public Liability Insurance Act, 1991, along with their amendments, draft Minor Mineral Conservation & Development Rules, 2010 framed under MMDR Act 1957, National Commission for protection of Child Right Rules, 2006 and rules made there under and also any other orders passed by the Hon'ble Supreme Court of India/Hon'ble High Court of Madras and any other Courts of Law relating to the subject matter.
- xxvii. Any appeal against this environmental clearance shall lie with the Hon'ble National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

TN


MEMBER SECRETARY
SEIAA-TN

Copy to:-

1. The Principal Secretary to Government,
Environment & Forests Department,
Govt. of Tamil Nadu, Fort St. George,
Chennai - 600 009.





2. The Chairman,
Central Pollution Control Board, Parivesh Bhavan,
CBD Cum-Office Complex, East Arjun Nagar,
New Delhi 110032.
3. The Member Secretary,
Tamil Nadu Pollution Control Board,
76, Mount Salai, Guindy,
Chennai - 600 032.
4. The ACCF(C), Regional Office of MoEF,
34, HEPC Building, 1 & 2 nd Floors,
Cathedral Garden Road, Nungampakkam,
Chennai - 600 034.
5. Monitoring Cell, I A Division,
Ministry of Environment & Forests,
Paryavaran Bhavan, CGO Complex,
New Delhi 110003.
6. The District Collector, Cuddalore District.
7. Stock File.





Government of India
Ministry of Environment, Forest and Climate Change
(Impact Assessment Division)

To,

The ASSOCIATE GENERAL MANAGER
ASIAN PAINTS LIMITED

ASIAN PAINTS LIMITED, PENTA DIVISION, B5 TO B10, SIPCOT
INDUSTRIAL COMPLEX, KUDIKADU VILLAGE, CUDDALORE, TAMIL
NADU,,Cuddalore,Tamil Nadu-607005

Subject: Grant of Environmental Clearance (EC) to the proposed Project Activity
under the provision of EIA Notification 2006-regarding

Sir/Madam,

This is in reference to your application for Environmental Clearance (EC)
in respect of project submitted to the Ministry vide proposal number
IA/TN/IND3/288480/2017 dated 23 Sep 2022. The particulars of the environmental
clearance granted to the project are as below.

- | | |
|---|--|
| 1. EC Identification No. | EC22A021TN152664 |
| 2. File No. | IA-J-11011/283/2021-IA-II(I) |
| 3. Project Type | Expansion |
| 4. Category | A |
| 5. Project/Activity including
Schedule No. | 5(f) Synthetic organic chemicals industry
(dyes & dye intermediates; bulk |
| 6. Name of Project | Expansion of Pentaerythritol from 730
MTM to 1500 MTM, Sodium Formate from
480 MTM to 1050 MTM and
Formaldehyde from 675 MTM to 1800
MTM and Captive Power Plant from 1.5
MW to 3.5 MW in Manufacturing |
| 7. Name of Company/Organization | ASIAN PAINTS LIMITED |
| 8. Location of Project | Tamil Nadu |
| 9. TOR Date | 21 Dec 2017 |

The project details along with terms and conditions are appended herewith from page
no 2 onwards.

Date: 29/11/2022

(e-signed)
Mr. Motipalli Ramesh
Scientist E
IA - (Industrial Projects - 3 sector)

*Note: A valid environmental clearance shall be one that has EC identification
number & E-Sign generated from PARIVESH. Please quote identification
number in all future correspondence.*

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File No. IA-J-11011/283/2021-IA II(I)
Government of India
Ministry of Environment, Forest and Climate Change
Impact Assessment Division
(Industry-3)

Indira Paryavaran Bhawan,
Jorbagh Road,
New Delhi – 110003.

Dated: 28th November, 2022

To

The Associate General Manager,
Asian Paints Limited, Penta Division,
B5 To B10, Sipcot Industrial Complex,
Kudikadu Village, Cuddalore District, Tamil Nadu-607005.
Email: s.senthilkumaran@asianpaints.com
Tel. No: 04142- 239423

SUB.: Expansion of Pentaerythritol from 730 MTM to 1500 MTM, Sodium Formate from 480 MTM to 1050 MTM and Formaldehyde from 675 MTM to 1800 MTM and Captive Power Plant from 1.5 MW to 3.5 MW in Manufacturing Units located at Penta Division at Plot No. B5–B10, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore Taluk, Cuddalore District, Tamil Nadu by M/s Asian Paints Limited - Environmental Clearance.

REF.: Your proposal No. IA/TN/IND3/288480/2017, Dated: 23rd Sep. 2022, on the above subject matter.

Sir/Madam,

1. The project-bearing proposal no. IA/TN/IND3/288480/2017 is for the environmental clearance for Expansion of Pentaerythritol from 730 MTM to 1500 MTM, Sodium Formate from 480 MTM to 1050 MTM and Formaldehyde from 675 MTM to 1800 MTM and Captive Power Plant from 1.5 MW to 3.5 MW in Manufacturing Units located at Penta Division at Plot No. B5–B10, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore Taluk, Cuddalore District, Tamil Nadu by M/s Asian Paints Limited.
2. The project/activity is covered under Category ‘B’ of item 5(f) (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) of Schedule of Environment Impact Assessment (EIA) Notification, 2006 (as amended). However, since the project site is located in a severely polluted area, as per the O.M. dated 31st October 2019, the project is considered as Category ‘A’ at Centre.
3. The PP applied for the ToR vide proposal number IA/TN/IND3/219681/2021 dated 10.1.2022 and the ToR was issued by the Ministry, vide letter No. IA-J-11011/283/2021-IA-II(I) dated 10.1.2022. The PP reported that Public Hearing was exempted as it is located in the notified industrial area designated by SIPCOT. The PP applied for Environment Clearance on 12.8.2022 in Form-2 and submitted the EIA/EMP Report and other documents. The PP reported in Form-2 that it is an **Expansion EC**. Due to some shortcomings, the project was referred back to PP on 23.8.2022, 22.9.2022, 22.9.2022 and

reply to the same was submitted on 10.9.2022, 22.9.2022, 23.9.2022. The proposal was placed in 39th EAC Meeting held on 29-30th September, 2022, wherein the Project Proponent and an accredited Consultant, ABC Techno Labs India Pvt. Ltd. [Accreditation number NABET/EIA/1922/RA0155 valid up to 7.11.2022] made a detailed presentation on the salient features of the project and informed the following:

- The PP reported that the proposed land area is 11.82 Ha and no R&R is involved in the Project. The details of products are as follows:

S. No.	Product Details (complete name)	CAS NO.	Existing Quantity (Metric Tonnes per month)	Proposed Quantity (Metric Tonnes per month)	Total Quantity (Metric Tonnes per month)
1	Pentaerythritol (Powder & Solution)	115-77-5	730	770	1500
2	Sodium Formate (Powder & solution)	141-53-7	480	570	1050
3	Formaldehyde (100% concentration)	50-00-0	675	1125	1800

- The PP reported that there is no violation case as per the Notification No. S.O.804(E) dated 14.03.2017 and no direction is issued under E(P) Act/Air Act/Water Act.
- The PP reported that certified compliance report has been issued by the IRO, Chennai vide F.No.EP/12.1/2021-22/SEIAA/11/TN dated 12.10.2021. Most of the conditions are complied and a few generic conditions are agreed to comply.
- The PP reported that National Green Tribunal (South Zone) in the judgement dated 4th May 2022, has dismissed the appeal citing that there is no merit in the appeal and cleared that the EC is considered valid and the appeal fails.
- The PP reported that there are no National Parks, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. within 10 km distance from site. Gadilam River – 0.5 Km (E) Bay of Bengal – 1.9 Km (E), Capper Hills Lake – 4.5 Km (NE) Perumal Lake – 8.8 Km (SE) and no Schedule-I species exist within 10 km study area of the project.
- The PP reported that the ambient **air** quality monitoring was carried out at 8 locations during 5th April 2021 to 26th June 2021 and the baseline data indicates the ranges of concentrations as: PM₁₀ (41.0 -70.0 µg/m³), PM_{2.5} (19.0-34.0 µg/m³), SO₂ (5.8-14.2 µg/m³) and NO₂ (12.9-23.6 µg/m³). The AAQ modeling study for point source emissions indicates that the maximum incremental GLCs after the proposed project would be 71.29 µg/m³, 19.06 µg/m³ and 24.03 µg/m³ with respect to PM₁₀, SO_x and NO_x. The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS). The ambient **noise** level monitoring was carried out at 8 locations and the baseline data indicates the ranges of daytime noise levels as 47.5 – 63.2 dB(A) and Night time noise levels as 42.7 – 53.6 dB(A). The **ground water** quality monitoring was carried out at 8 locations during 27th May 2021 to 28th May 2021 and the baseline data indicates the ranges of pH varied from 7.58 to 8.04. TDS varied between 266 to 2648 mg/l. Total Hardness varied from 117 mg/l to 820 mg/l. Chloride varied from 68 mg/l to 1253 mg/l and Nitrate varied from 2 to

17 mg/l. Heavy metals like Arsenic, Manganese, Chromium, Lead, Mercury, and Cadmium were found to be below detection limit at all locations. Total coliform found to be <2 to 4 MPN/100ml. The **surface water** quality monitoring was carried out at 8 locations during 27th May 2021 to 28th May 2021 and the baseline data indicates the ranges of pH varied from 7.76 to 8.22. Turbidity varied between 1.8 to 14 NTU. TDS varied from 231 to 32278 mg/l. BOD found between <2 mg/l to 5.4 mg/l. Dissolved Oxygen varied from 4.5 mg/l to 5.9 mg/l. Heavy metals like Chromium, Mercury and Lead were found to be below detection limit at all locations. Total Coliform count varies between 80 to >1600 MPN/100ml. **Soil** quality monitoring was carried out at 8 locations during 25th May 2021 to 28th May 2021 and the baseline data indicates the ranges of pH varied from 7.51 to 8.41. Electrical conductivity found within a range from 0.17 to 1.02 mS/cm. The texture of soil is predominantly clay in most of the places with loamy sand in some locations. Available Nitrogen ranged from 159 kg/ha to 264 kg/ha, Potassium ranged from 272 ha to 560 kg/ha, Available Phosphorus ranged from 18.8 kg/ha to 42.4 kg/ha. Soil organic content varied from 0.5% to 0.87%, which indicates moderate fertility.

10. The PP reported that the total water requirement is 1694 KLD of which fresh water requirement is 1500 KLD and will be met from SIPCOT water supply. The total effluent generated would be 295 KLD (Process & Utility – 250; Domestic – 45). The treated effluent (Process & Utility) of 194 KLD from ETP, RO and MEE will be reused in the process and the treated effluent from the STP (41 KLD) will be used for green belt etc. The plant will be based on Zero Liquid Discharge.
11. The PP reported that the power requirement will be met using the proposed in-house 3.5 MW Captive Power Plant. Additional power requirement will be met from TNEB & Diesel generator in case of emergency. Existing unit has DG sets of 1 no. of 500 kVA & 1 no. of 600 kVA capacity, additionally DG sets are used as standby during power failure. Stack (12m) will be provided as per CPCB norms to the proposed DG sets.
12. **Details of process emissions generation and its management:** Point sources emission of pollutant into air from the proposed project after expansion will be through the dryers, DG sets which run on HSD and the boilers (34 TPH), which operate on coal/lignite/biomass and through process vents. Adequate stack height of DG set will be maintained and Multi cyclone with wet scrubber will be installed at dryers, Multi cyclone separators and bag filters to boilers to control pollutant emission under norms. Solvent recovery system will be related to VOC control system and finally to activated carbon adsorption system to avoid release any solvent vapours/fumes in the atmosphere. There may be possible VOC emissions from the process and the control measures adopted is tank vents are connected to blower suction. The proposed air emissions generated from the above process will be treated in the existing Air Pollution Control (APC) Systems. The adequacy of the existing APCs will be sufficient for the proposed activities as they will be APC facilities will be part of new facilities.
13. **Details of Solid and Hazardous Waste Generation and its Management:** The hazardous waste generated from the site/process units consist of used/spent oil from maintenance activities. The wastes will be classified as per the Hazardous and Other Wastes (Management and Trans boundary Movement) Rules, 2016 and Solid Waste Management Rules 2016 and be collected, stored, treated and disposed as per rules.

S. No.	Hazardous Waste Type	Category	Quantity		Mode of disposal
			Existing	Expected Quantity (after expansion)	
1	ETP Sludge (TPA)	35.3	172	355	TSDF Gummidipoondi/ any Cement industry
2	Waste from Lime (TPA)	20.4	0	850	TSDF / any cement industry
3	Used or spent oil (TPA)	5.1	0.9	2.6	To authorized recyclers
4	Wastes or residues containing oil (TPA)	5.2	0.3	2.2	To authorized recyclers
5	Spent Carbon (TPA)	36.2	7.78	16	To authorized waste processing agency / cement industry
6	Distillation residue (TPA)	20.3	2640	6000	Authorized agency for co fuel manufacture
7	Spent Ion exchange resin (TPA)	35.2	9.6	19.75	TSDF
8	Spent solvent - Motherliquor (TPA)	20.2	0	1000	Co fuel in Boiler/ authorized agency
9	Spent solvent- Recovered Methanol from off gas (TPA)	20.2	0	100	Co fuel in Boiler
10	Asbestos-containing residues (TPA)	15.2	0	20	TSDF

Details of Solid Waste Generation Details and Disposal Methods

S. No.	Waste type	Quantity (Tons/Annum)		Mode of disposal	Physical status
		Existing	After Expansion		
1	Used HDPE bags	5.2	15.0	Registered recycler	Solid
2	Used filter clothes	3.0	7.0	Registered recycler	Solid
3	Canteen Waste/biodegradable	1.0	5.0	Onsite composting for green belt	Solid
4	Wooden scrap / broken pallet	4.2	10.0	Domestic usage	Solid
5	Paper Waste	0.5	5.0	Municipal agency	Solid
6	Plastic bag / Plastic	0.5	10.0	Registered recycler	Solid
7	Waste				
8	Used insulation material	4.1	20	TSDF	Solid
9	Miscellaneous Garbage, Broken packaging	1.0	10.0	Registered recycler	Solid

14. The **Budget** earmarked towards Environmental Management Plan (EMP) is ₹432 lakhs (capital) and the Recurring cost (operation and maintenance) will be about ₹681.97 lakhs per annum. Industry proposes to allocate ₹17 lakhs towards CER.
15. The PP reported that Public Hearing is exempted since the project site is located in the notified Industrial area.
16. The PP reported that APL-Penta Division will continue to maintain existing green belt in the plant premises which is about 37% (43722.2 sq.m) with survival rate of 75-80%. Also developed 0.85 Acres (3540 sq.m) of area as Garden and lawn which accounts for about 2.92%. Total 12894 no.s of trees are present within the plant premises as green belt with a spacing of 2.0 x 2.0 m. APL-Penta Division also planted about 1405 trees outside plant premises from 2018 under Corporate Environmental Responsibility (CER).
17. The PP proposed to set up an Environment Management Cell (EMC) by engaging Senior Manager – Environment & Quality Assurance, Senior Executive Environment, Manager safety, safety engineer, Environment Lab Officer for the functioning of EMC.
18. The PP submitted that the total GHG emissions estimated for Existing operations under Scope 1, Scope 2 and Scope 3 are 44572.1 tCO₂ eq./Annum and for additional expansion the total GHG emissions estimated are 47666 tCO₂ eq./Annum. Thus, Total GHG Emissions from both existing operations and additional expansion will be: **92238.1 tCO₂ eq/ Annum.** APL-Penta Division implemented several activities which lead to reduction in thermal and power consumption for manufacturing process and utilities. For existing operations, Net GHG emission Reduction is estimated to be 2704.63 tCO₂ eq./Annum and for additional expansion will be 5786.4 tCO₂ eq./Annum. Thus, Total GHG emission reduction will be 8491.03 tCO₂ eq./Annum. Reduction in CO₂ emission due to process schemes and Carbon sequestration will be 8777.03 tCO₂ eq./Annum. Total Carbon Footprint of the Penta plant activities after expansion has been estimated as 92238.1 tCO₂ eq./Annum. Total Carbon Footprint with mitigations (Process emission reduction and Carbon Sequestration) will be 83461.07 tCO₂ eq./Annum. Thus, GHG reduction will be about 9.52% after expansion.
19. The PP submitted the disaster and Onsite and Offsite Emergency Plans in the EIA report.
20. The cost for the proposed expansion is estimated at INR **16.43 Crores** The existing manpower is 123 Nos. However, additional manpower is anticipated up to 17 Nos.
21. **Deliberations by the EAC**

The EAC constituted under the provisions of the EIA Notification, 2006 comprising Expert Members/domain experts in various fields, examined the proposal submitted by the PP in desired format along with the EIA/EMP reports prepared and submitted by the Consultant accredited by the QCI/ NABET on behalf of the PP.

The EAC noted that the PP has given an undertaking that the data and information given in the application and enclosures are true to the best of his knowledge and belief and no information has been suppressed in the EIA/EMP reports. If any part of data/information submitted is found to be false/ misleading at any stage, the project will be rejected and Environmental Clearance given, if any, will be revoked at the risk and cost of the PP.

The EAC noted that the EIA reports are in compliance of the ToR issued for the project, reflecting the present environmental status and the projected scenario for all the environmental components. The EAC deliberated on the proposed mitigation measure towards Air, Water, Noise and Soil pollutions. The EAC suggested that the storage of toxic/explosive raw

materials/products shall be undertaken with utmost precautions and following the safety norms and best practices.

The EAC inter-alia, deliberated on and sought the following:

- Compliance of Ministry's O.M. dated 31.10.2019 regarding mitigation measures for projects located in CPAs and SPAs
- Methodology adopted for estimation of Carbon Sequestration.
- Justification for inclusion of captive power plant in the proposal since it was not mentioned in the ToR.
- Justification for reduction in fresh water requirement.

The PP submitted the same and EAC found it to be satisfactory.

The EAC also deliberated on the Onsite and Offsite Emergency plans and also the various mitigation measures proposed during implementation of the project and advised the PP to implement the provisions of the Rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, as amended from time to time.

The EAC deliberated on the proposal with due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC found the proposal in order and recommended for grant of environmental clearance. The MoM of 39th EAC were confirmed (with correction) in the 40th EAC meeting held on 18th – 19th October, 2022. The MoM are available on PARIVESH.

The EAC is of the view that its recommendation and grant of environmental clearance by regulatory authority to the project/activity is strictly under the provisions of the EIA Notification 2006 and its subsequent amendments. It does not tantamount / construe to approvals / consent / permissions etc. required to be obtained or standards / conditions to be followed under any other Acts / Rules / Subordinate legislations, etc., as may be applicable to the project. The PP shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

22. Based on the proposal submitted by the PP and recommendations of the EAC (Industry-3 Sector), the Ministry of Environment, Forest and Climate Change hereby accords Environmental Clearance for ***“Expansion of Pentaerythritol from 730 MTM to 1500 MTM, Sodium Formate from 480 MTM to 1050 MTM and Formaldehyde from 675 MTM to 1800 MTM and Captive Power Plant from 1.5 MW to 3.5 MW in Manufacturing Units located at Penta Division at Plot No. B5–B10, SIPCOT Industrial Complex, Kudikadu Village, Cuddalore Taluk, Cuddalore District, Tamil Nadu by M/s Asian Paints Limited”*** under the provisions of the EIA Notification, 2006, subject to the compliance of terms and conditions as under:-

A. Specific Conditions:

- (i) The operating parameters shall be maintained so that the stack emissions comply with the prescribed norms i.e. PM < 50 ppm; SOx < 600 mg/Nm³; NOx < 300 mg/Nm³. Boiler stack emissions shall be maintained as per TPP guidelines for units installed after 1st Jan. 2003 to 31st Dec. 2016.

- (ii) Continuous online (24x7) monitoring system for stack emissions shall be provided for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB servers.
- (iii) Cyclone separators and Bag filters shall be provided for effective fugitive emission control. Covered pneumatic system and Silo shall be provided for transport and storage of ash.
- (iv) The transportation of materials shall be by rail/belt conveyor, to the extent feasible.
- (v) Industry shall use biomass as Primary Fuel for Boiler and only in case of shortage of Briquettes, coal/lignite may be used as secondary fuel. Further, efforts shall be made for the usage of natural gas.
- (vi) The PP shall ensure that best available technology is used.
- (vii) The PP shall increase the existing greenbelt of 37% to at least 40 % of total area by planting 570 number of trees within a period of one year from grant of EC. The saplings selected for the plantation should be of sufficient height, preferably 6-ft (about 2m). The budget earmarked for the plantation shall be ₹2 Lakh and shall be kept in separate account and should be audited annually. The PP should annually submit the audited statement along with proof of activities viz. photographs (before & after with geo-location date & time), details of the expert agency engaged, details of species planted, number of species planted, survival rate, density of plantation etc. to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.
- (viii) In addition to the above, 1200 number of saplings shall be planted in the next 2 years such as avenue plantation, plantation in vacant areas, social forestry, etc.
- (ix) The transportation load on roads shall be within their carrying capacity and adequate width of the roads shall be maintained inside the industrial premises.
- (x) The treated effluent (Process & Utility) from ETP, RO and MEE shall be reused in the process and the treated effluent from the STP shall be used for green belt etc. Zero Liquid Discharge shall be maintained.
- (xi) Continuous monitoring of effluent quality/quantity shall be provided along with installation of web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
- (xii) The storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.
- (xiii) Fly ash shall be utilized as per the fly ash utilization notification from time to time.
- (xiv) Distillation residue/ spent carbon shall be sent for co-processing as per Hazardous waste authorisation. Used or spent oil / waste or residue containing oil shall be sent to authorised recyclers as per Hazardous waste authorisation.
- (xv) Monitoring of compliance of EC conditions shall be submitted with third party audit every year.
- (xvi) Provision of Safe drinking water supply, sanitation & medical facilities, promoting eco-friendly behaviour through use of Green Energy in schools etc. shall be done within the study area under the CER.

- (xvii) A separate Environmental Management Cell (having qualified persons with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions. PP shall engage Senior Manager – Environment & Quality Assurance, Senior Executive Environment, Manager safety, safety engineer, Environment Lab Officer. In addition to this one safety & health officer as per the qualification given in Factories Act 1948 shall be engaged within a month of grant of EC. The PP should annually submit the audited statement of amount spent towards the engagement of qualified persons in EMC along with details of person engaged to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.
- (xviii) The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented. The budget proposed under EMP is ₹432 lakhs (Capital cost) and ₹681.97 lakhs (Recurring cost) shall be kept in separate account and should be audited annually. The PP should submit the annual audited statement along with proof of implementation of activities proposed under EMP duly supported by photographs (before & after with geo-location date & time) and other document as applicable to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.
- (xix) The total water requirement of 1694 KLD, of which fresh water requirement is 1500 KLD shall be met from SIPCOT water supply. The PP should ensure that water supply should not be above the permissible limit as mentioned in the letter and fresh water shall be withdrawn only after obtaining valid agreement from Concerned Authority. The PP should submit the details of utilization to the Integrated Regional Office (IRO), MoEF&CC before 1st July of every year for the activities carried out during the previous year.
- (xx) No banned chemicals shall be manufactured by the PP. No banned raw materials shall be used in the unit. The PP shall adhere to the notifications/guidelines of the Government in this regard.
- (xxi) The PP shall utilize modern technologies for capturing of carbon emitted and shall also develop carbon sink/carbon sequestration resources capable of capturing more than emitted. The implementation report shall be submitted to the IRO, MoEF&CC in this regard.
- (xxii) The project proponent shall comply with the environment norms for Organic Chemical Industry as notified by the Ministry of Environment, Forest and Climate Change, *vide* GSR 1241(E), dated 28.12.2018 under the provisions of the Environment (Protection) Rules, 1986.
- (xxiii) All necessary precautions shall be taken to avoid accidents and action plan shall be implemented for avoiding accidents. The PP shall implement the onsite/offsite emergency plan/mock drill etc. and mitigation measures as prescribed under the rules and guidelines issued in the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996.

- (xxiv) The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.
- (xxv) The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
- (xxvi) The occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
- (xxvii) Training shall be imparted to all employees on safety and health aspects for handling chemicals. Safety and visual reality training shall be provided to employees. Action plan for mitigation measures shall be properly implemented based on the safety and risk assessment studies.
- (xxviii) The unit shall make the arrangement for the protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.
- (xxix) The solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (xxx) The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.
- (xxxi) The PP shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapour recovery system. (f) Use of high pressure-hoses for equipment cleaning to reduce wastewater generation.
- (xxxii) The activities and the action plan proposed by the project proponent to address the issues raised during the public hearing as well as the related socio-economic issues in the study area shall be completed as per the schedule presented before the Committee and as described in the EIA report in letter and spirit.

B. General Conditions:

- (i) No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.

- (ii) The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and other rules notified under various Acts.
- (iii) The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
- (iv) 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 shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
- (v) The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
- (vi) The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
- (vii) A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
- (viii) The project proponent shall also upload/submit six monthly reports on PARIVESH Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
- (ix) The environmental statement for each financial year ending 31st 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 compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.
- (x) The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at **<https://parivesh.nic.in/>**. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.
- (xi) 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.

- (xii) This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.
23. The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental clearance, if implementation of any of the above conditions is not found satisfactory.
24. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.
25. Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
26. The above conditions shall be enforced, *inter-alia* under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.

This issues with approval of the competent authority.

(Dr. Motipalli Ramesh)
Scientist 'E'

Copy to: -

1. The Deputy Director General of Forests (C), Ministry of Environment, Forest and Climate Change, Regional Office (SEZ), 1st and 2nd Floor, Handloom Export Promotion Council, 34, Cathedral Garden Road, Nungambakkam, Chennai-34.
2. The Principal Secretary to Government, Department of Environment, Climate Change and Forests, Government of Tamil Nadu, No. 1, Jeenias Road, Panagal Building, Ground Floor, Saidapet, Chennai-600 015.
3. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi - 32
4. The Member Secretary, Tamil Nadu Pollution Control Board, 76, Mount Salai, Guindy, Chennai - 600 032.
5. The Member Secretary, Central Ground Water Authority, Jamnagar House, 18/11, Man Singh Road Area, New Delhi, Delhi 110001
6. The District Collector, Cuddalore District, Tamil Nadu.
7. Guard File/Monitoring File/PARIVESH.

(Dr. Motipalli Ramesh)
Scientist 'E'
Tel. 011-20819249
Email: ramesh.motipalli@nic.in



Compliance to the Conditions stipulated in the Environmental Clearance for Asian Paints Limited– at B5-B10 SIPCOT Industrial Complex, Kudikadu village, Cuddalore Taluk, Cuddalore District issued by SEIAA on 24.04.2018 for the period (October 2025 to March 2026)

Reference Letter No. SEIAA/TN/F.6495/5(f)/EC-60/2018 dated 24.04.2018

(A) Specific Conditions:

S.No	Condition	Compliance
1	It is Mandatory for the Project Proponent to furnish to the SEIAA, half yearly Compliance report in hard and soft copies on 1 st June and 1 st December of each calendar year in respect of the conditions stipulated in the prior Environmental Clearance issued.	Complied. We have submitted half yearly compliance with respect of the conditions stipulated in Environmental Clearance to the SEIAA. Submitted covering letter enclosed as annexure 25.
2	Consent for Establishment shall be obtained from Tamil Nadu pollution Control Board and a copy of the same shall be furnished to the SEIAA, Tamilnadu before start of project construction activity at the site.	Complied. We have obtained Consent to operate Expansion for our unit as expansion is based predominantly on de-bottlenecking. Latest CTO No: 2607272580461 dated:11/03/2026 is enclosed as Annexure 28.
3	The implementation of Environmental management plan in regard to the treatment and disposal of sewage & Effluent, Solid waste management, Hazardous – Waste Management, and CSR activities should be carried out, as proposed and committed. Regular monitoring should be carried out during operation phases.	Complied. We confirm that the implementation of Environmental management plan regarding the treatment and disposal of sewage & Effluent, Solid waste management, Hazardous Waste Management are being done as committed (ETP, STP, Hazardous waste storage shed photos are enclosed as Annexure 29,30,31). The CSR activities are being carried out and Health centres are operated in Kudikadu, Karaikadu, Eechangadu & Pachayankuppam. (Annexure 13) All sewage effluents are treated in Sewage Treatment Plant within our

		unit. Treated water is used for gardening purposes. We have valid Hazardous waste authorization upto 31st March 2029 and wastes are sent to TNPCB authorized agencies.
4	The residue collected from the evaporator shall be documented by maintaining proper register and it should be made available at the time of inspection.	Complied. We here-by confirm that the details of residue collected from the evaporator is documented in register. A copy is enclosed for reference. (Annexure 32)
5	Adequate dust extraction system such as ducting with dust extracting arrangement wherever required shall be established to achieve occupational – health standards and ambient air quality standards.	Complied. Adequate dust extraction system such as ducting with dust extracting arrangement is already available in TECHPENTAERYTHRITOL, Mono PENTAERYTHRITOL, DI PENTAERYTHRITOL & Sodium Formate driers (Annexure 33). The unit is having Continuous Ambient Air Quality monitoring station for monitoring the ambient air quality standards, the online VOC monitors are installed and the same are connected to CARE AIR center photo is enclosed as Annexure 2.
6	The proponent shall carryout best housekeeping practices as spillage management for handling and maintenance of raw materials and products inside the unit premises.	Complied. Chemicals like acetaldehyde and methanol stored in separate storage tanks with adequate safety measures such as dyke valve, SRV's, Rupture disk, Level indicators, LEL detectors, break away couplings. All ingredients to process are added through a measurement devices like magnetic flow meter load cell and only required quantity of the material taken for consumption. Control valves with inter locks installed to automatically stop the inputs to avoid spillages.

7	Nature of chemicals Handled, the Do and Don'ts shall be displayed at all vital locations as laid down in MSDS.	Complied. Nature of chemicals Handled, the Do and Don'ts has been displayed at all vital locations as laid down in MSDS. (Annexure 34)
8	The proponent shall ensure that the quantity of Hazardous Waste handed over to the TSDF shall match with the quantity generated.	Complied. All Hazardous Waste generated are disposed to the TSDF and records are available. The quantity generated is handed over to TSDF and submitting form 10 to TNPCB monthly. (Annexure 35)
9	The proponent shall provide a separate closed area earmarked for storing solid waste including Hazardous Waste as proposed.	Complied. We state that, a dedicated closed shed has been established for storing solid waste and Hazardous Waste. (Annexure 31)
10	The proponent shall dispose Hazardous Waste generated as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Spent oil from D.G sets should be stored in HDPE drums in an isolated covered facility and disposed off through TNPCB registered recyclers.	Complied. All Hazardous Wastes have been disposed as per the Hazardous and other Wastes (Management and transboundary Movements) Rules, 2016. Spent oil from DG sets is being stored in drums in an isolated hazardous waste storage shed facility and disposed through TNPCB authorized recyclers. (Annexure 31)
11	The Plastic wastes shall be segregated and disposed as per the provisions of Plastic Waste (Management & Handling) Rules 2016	Complied. We state that, generated plastic wastes are being segregated and disposed as per the provisions of Plastic Waste (management & handling) rules 2016 to authorized registered recycler – M/s Jeeva Enterprises, Vandalur, Chennai.
12	The e - waste generated should be collected and disposed to a nearby authorized e-waste center as per e waste (Management & Handling), Rules 2016 as amended.	Complied. We state that, generated e-waste is being collected and it is disposed to authorized e-waste registered recycler and batteries are purchased as buy back policy from the vendor.

13	The Municipal solid waste generated shall be collected, segregated and disposed as per Solid Waste Management Rules,2016.	Complied. Generated municipal solid waste is being collected, segregated as biodegradable and non-bio-degradable waste and disposed as per Solid Waste Management Rules,2016.
14	The industry shall conduct air sampling at least once in six months for the general core parameters (PM10, PM2.5, SOx, NOx) through TNPCB/NABL Accredited Laboratory and maintain records of the same and it should be made available at the time of inspection.	Complied. We confirm that, we are conducting AAQ survey (PM10, PM2.5, SOx, NOx) by TNPCB Lab / NABL accredited Laboratory monthly. We ensure that the results are with-in the TNPCB permissible limit. (Annexure 36)
15	Regular monitoring on the air quality, water quality and noise on the selected locations in and around the project site as mentioned in the EMP report for creating base line data shall be continued and records shall be maintained.	Complied. We confirm that, we are carrying out air quality, water quality and noise monitoring on the selected locations of the factory premises periodically through TNPCB and through external Lab. Reports enclosed as Annexure 23,36, & 37.
16	A separate environment and safety management cell with qualified staff shall be set up before establishment of the facility and shall be retained throughout the lifetime of the industry, for implementation of the stipulated environmental safeguards.	Complied. A separate environment and safety management cell with Qualified Safety Officer, chemists and Managers has been established for the implementation of the stipulated environment safeguards. This team is continuously available. (Annexure 14)
17	The Green belt area already developed within the project area shall be properly maintained.	Complied. We here by confirm that we have developed and maintaining a Green belt area about 40% within the premises. Photos are enclosed as Annexure 5.
18	The industry shall promote tree plantation to neutralize their carbon footprint. The industry shall engage regularly in afforestation programme.	Complied. We confirm that we had planted and maintaining 18127 trees inside the factory premises. The industry is

		engaging regularly in afforestation programme within and beyond the fence as per the SIPCOT requirements. Greeneries Photo attached. In the period of April 2025 to March 2026, we have planted 1181 tree saplings. Photos are enclosed as Annexure 5 & 7.
19	The proponent shall ensure effective risk management strategy regarding confined space management to avoid risk while handling raw materials, products in the process area and storage.	Complied. All the hazards and risks related to confined space management, handling of raw materials & products are identified. Systems and procedures have been established and followed for mitigating identified risks. Established systems are periodically assessed by competent person regarding Confined space management. (Annexure 38).
20	The industry shall conduct air sampling at least twice in a week (104 times in a year), as stipulated under EP Act 1986.	Complied. We confirm that air sampling survey is being carried out twice in a week (104 times in a year), as stipulated under EP Act 1986. (Annexure 36).
21	Risk cum disaster management plan should be in place in the industry premises at all times.	Complied. We confirm that the Risk cum disaster management plan is available in the industry premises at all times in the Emergency control center (Annexure 39)
22	Water conservation scheme including rainwater harvesting measures to augment ground water resources shall be implemented so as to collect and reuse the entire rainwater harvested as a supplement to fresh water.	Complied. We state that water conservation scheme including rainwater harvesting including roof water has been implemented in the factory premises (Annexure 11)
23	The natural drainage pattern in the project area shall be maintained and storm water drain along the boundary and appropriate - places shall be provided considering -the Catchment area and maximum intensity of	Complied. We confirm that adequate and suitable storm water drains were provided in the factory premises considering the Catchment area and maximum

	rainfall to collect runoff water/rainwater for proper disposal to avoid flooding around the premises.	intensity of rainfall and the runoff water/rainwater collected for proper disposal to avoid flooding around the premises. (Annexure 11)
24	The Environmental Clearance is issued without prejudice to any order that may be passed by the Hon'ble NGT/ Hon'ble High Court of Madras.	Noted
25	All the assurances given in EIA and EMP shall be adhered to strictly.	Noted. We state that we have been abiding by the said conditions.
26	Detail study shall be carried out by engaging accredited agencies / reputed institutions for Risk management and detailed Disaster management plan prepared for compliance.	Complied. We confirm that Risk and Disaster management study has been carried out by accredited agency and suitable plan has been prepared and complied. (Annexure 39)
27	Sufficient funds should be provided for Disaster management.	Complied. We assure that the sufficient funds are provided for Disaster management plan for every year. Valid Public Liability Insurance is available (Annexure 40)
28	The Project Proponent shall provide disinfection by UV system for the sewage treatment plant for treating the sewage before applying on land for gardening.	Complied. We state that UV disinfection system has been provided for our existing sewage treatment plant (Annexure 41)
29	The project proponent must provide closed loop silo for ash handling and the same shall be installed before 30.05.2018 as committed-and submit the proof to SEIAA-TN,	Complied. We confirm that Closed loop silo for ash handling has been installed and it is operational condition (Annexure 42)
30	The project proponent shall provide sufficient ventilation (air circulation) in the hazardous waste storage yard where the hazardous waste like spent carbon, Chemical sludge, used or spent oil are being kept.	Complied. We confirm that sufficient ventilation (air circulation – 1 no. of vent) has been provided in the hazardous waste storage yard where the hazardous waste like spent carbon, Chemical

		sludge, used or spent oil are being kept. (Annexure 43)
31	The industry should completely revamp fly ash collection from the source, conveyance, storage and disposal in a more scientific manner and to reduce the fugitive emissions in fly ash handling. The final disposal of the fly ash will be as per MoEF & CC Notification S.O. 254 (E) dated: 25th January 2016.	Complied. The system has been revamped. We state that the generated fly ash is collected in a closed system (SILO) instead of manual collection. The fly ash is disposed as per MoEF & CC Notification S.O. 254 (E) dated: 25th January, 2016 and amendment hence forth (Annexure 42)
32	The Project Proponent shall carry out-safety audit in the different operating zones of the plant at least once in a year and the same shall be considered as base for reviewing the unsafe conditions during the plant safety meeting.	Complied. We confirm that the safety audit is being conducted once in a year by competent person and reviewing the unsafe conditions during the plant safety meeting. (Annexure 17)
33	The Project Proponent shall prepare a code of practice for safe operation for educating the safety standards to the work force deployed in the plant through appropriate training by the concerned experts.	Complied. We confirm that we are having safety manual/SOP for every process and training being imparted to all the employees for safe handling of chemicals as well as for safe operations (Annexure 44)
34	As the plant operation involves the sensitive processing, the medical officer and the supporting staff involved in the health center activities shall be trained in occupational health surveillance (OHS) aspects through the outsourced training from the experts available in the field of OHS for ensuring the health standard of persons employed.	Complied. We state that our factory medical officer and the supporting staff (3 Nos.) is being involved in the occupational health center activities and has been trained in occupational health surveillance (OHS) aspects as per Tamil Nadu Factories Rules 1950. (Annexure 20)
35	The Activity of the industry should no way pollute water bodies such as Uppanar River, Perumal Lake & Bay of Bengal.	Complied. We confirm that in no way the activity of the industry pollute the nearby water bodies such as Uppanar river, Perumal lake & Bay of Bengal. We have Zero liquid discharge system. All treated water is being reused.

36	The Activity of the industry should not impact on agricultural, irrigation system and mangroves surrounding the area.	Complied. We confirm that we have provided and maintaining the air and water pollution control/prevention equipment's as per the condition of the TNPCB consent order. Our manufacturing activities do not affect nearby agricultural, irrigation system and mangroves surrounding the area.
37	The EMP cost of Rs.576 lakhs and operation and maintenance cost Rs. 23.6 lakhs shall be deposited in a nationalized bank by opening a separate account and the head wise expenses statement shall be submitted to TNPCB with a copy to SEIAA annually.	Complied. We confirm that we maintain a separate bank account (A/c no.: 37888950027, State Bank of India, O.T, Cuddalore) for expenses related to implementation of Environment Management Plan. Our corporate office has approved dedicated budget for improvement of the existing Environment management programme. In half yearly compliance report, we are submitting bank account statement once every six months to TNPCB, SEIAA & MOEF&CC. Bank statement is enclosed Annexure 6.
38	There should be no threat to Biodiversity due to the operation of the industry.	Noted & Complied. 1. Biodiversity with birds with natural habitat in the green belt maintained. Different tree varieties are planted (Calophylluminophyllum-Pungan 2. Syzygiumcumini- Naval 3. Thespesiapopulnea- Poovarasu 4. Terminalia arjuna- Neermarudu 5. Ficusbengalensis — Alamaram 6. Ficusretusa- Atthi 7. Ficusbengalensis- Arasamaram 8. Alstoniascholaris- Palai 9. Mimusopselengi - Mahilam 10. Madhucalongifolia - Ihupai

39	The Flora & Fauna present in and around the project site should not get affected due to the activity as reported.	Complied. Garden is maintained. We confirm that the Flora & Fauna present in and around the factory premises are in good condition. They will not get affected due to our manufacturing operation. Sparrow, Wood pecker, Parrot, Myna, king fisher, different species of sparrows are present.
40	The Project Proponent has to provide rain water harvesting collection tank to the capacity of 200 cu.m in order to recover and reuse the rain water during normal rains.	Complied. We state that we had provided rain water harvesting tank of 200 cu.m capacity within the plant. We also have 20000 cum rain water harvesting facility beyond the fence (in Sedapallam, Agraharathu Eri, T Palayam, Krishnankuppam, Annavallithangal, Kambankulam)
41	The operation of the activity should not Impact on the soil, micro flora & Fauna present in and around the project site.	Complied. We state that the operation of the activity has no Impact on the soil, micro flora & Fauna present in and around the Factory premises.
42	The project proponent shall carry out' risk assessment process for all the operations involved in the plant and a suitable, risk; management plan showing the contours of sensitive zones should be prepared..	Complied. We confirm that we had carried out a detailed Quantitative Risk assessment showing the contours of sensitive zones by competent person for all the operations involved in the plant. The recommended points have been implemented (Annexure 17)

43	The industry shall develop green belt in the open areas by planting the following species in future: 1. Calophylluminophyllum-Pungan 2. Syzygiumcumini- Naval 3. Thespesiapopulnea- Poovarasu 4. Terminalia arjuna- Neermarudu 5. Ficusbengalensis — Alamaram 6. Ficusretusa- Atthi 7. Ficusbengalensis- Arasamaram 8. Alstoniascholaris- Palai 9. Mimusopselengi - Mahilam 10. Madhucalongifolia - Ihupai	Complied. We state that we had developed 19308 trees in the factory premises and we have also planted below mentioned species. 1. Calophylluminophyllum-Pungan 2. Syzygiumcumini- Naval 3. Thespesiapopulnea- Poovarasu 4. Terminalia arjuna- Neermarudu 5. Ficusbengalensis — Alamaram 6. Ficusretusa- Atthi 7. Ficusbengalensis- Arasamaram 8. Alstoniascholaris- Palai 9. Mimusopselengi - Mahilam 10. Madhucalongifolia - Ihupai
44	The project proponent shall take up better housekeeping measures including scraps disposal and up keeping the machineries, pipes etc.	Complied. Asian Paints is adhering with the better Housekeeping practice. Scrap disposal is regularly done. Machinery upkeep is regularly done.
45	The proponent should continuously monitor the VOC and ensure that VOC levels are within permissible limits.	Complied. We confirm that we had already installed online VOC monitoring system in our plant for continuous monitoring and the same is connected to CARE AIR CENTRE, TNPCB, GUINDY We maintain VOC levels within the permissible limit. Photos enclosed as annexure 17.

46	Air pollution control — there are four sources of air emissions within the industry process-Tech PE drier, Sodium formate drier, Mono drier and Di PE drier. 1. From the Tech PE drier, particulates of Pentaerythritol will be emanating which will be controlled in a bag filter and finally emitted to the environment through a stack. There will be increase in the pollutant load from 1.33 kgs/ day to 1.72 kgs/day and hence additional bag filter capacity should be created. 2. From the Sodium formate drier, suspended particulate matter will be emitted which is sent to wet scrubber and then to the stack. The existing scrubber should be replaced with a new one. 3. From both Mono PE drier and Di PE drier, SPM will be emitted which is sent to wet scrubber and then to stacks. There is an increase in the amount of pollutant, but the proponent should increase the efficiency of the scrubber to absorb the additional pollutant load.	Complied. We ensure that the air pollution control system has been established in the following locations. 1. The existing TECH PE Drier bag filter capacity has been increased from 74.30 m² to 75.46 m² thereby capable to handle pollution load to 1.72 Kgs / day. 2. The low-capacity wet scrubber has been replaced with higher capacity wet Scrubber there by improving the scrubbing efficiency as recommended. 3. The existing wet scrubber scrubbing liquid flow rate has been increased as mentioned below by which the scrubbing efficiency has got increased by which the emission levels got reduced. 1. Mono PE Scrubber – 6 litres per minute (lpm) to 6.5 lpm 2. Di PE Scrubber – 7.5 lpm to 8 lpm.
47	The project proponent has to provide/ install the following -before 30.04.2018 as committed and furnish proof of the same to SETAA-TN : 1. The Sewage sludge bed capacity should be increased from 5.27 m³ to 10.5 m³ . 2. The sludge drying bed 2. Nos should be provided in additional to the existing Sludge drying bed for managing sludge . 3. The agreement with hazardous waste management and disposal facilities shall be made including the quantum of hazardous waste and the life period.	Complied. We confirm that we have installed the below mentioned activities before 30.04.2018: 1. We state that the sludge bed capacity has been increased from 5.27 m³ to 10.5 m³ as recommended. 2. We state that the existing 2 nos. of open type sludge bed has been provided as closed type solar drying bed by covering with UV stabilized sheet there by the drying capacity/efficiency has got

		increased, which meets the said requirement. 3. We are commissioned sludge handling facilities like Filter press and screw press in Financial year 23-24. 4. The agreement has been amended for the quantum of Hazardous waste with life period.
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(B) General Conditions

S.No	Condition	Compliance
1	This Environment clearance shall not be cited to relax any other rules applicable to this project	Noted.
2	The project proponent should advertise at least in two local newspapers widely circulated. One of which shall be in the vernacular language of the locality concerned within 7 days of the issue of the Environmental clearance informing that the project has been accorded Environmental clearance and a copy of the clearance letter is available with TNPCB and also at the website of the SEIAA. TN at Http://www.seiaa.tn.gov.in	Complied. Information on accordance of the Environment clearance to the project has been published in two local newspapers (Annexure 27)
3	A copy of the Environmental clearance shall be sent by the project proponent to concern local body and local NGO, if any from whom suggestions/ representatives if any were received while processing the proposal.	Complied. A copy of the Environment clearance has been submitted to local body and local NGO. (Annexure 24)
4	The Environmental clearance shall also be put on the website of the company	Complied. The Environment clearance has been published in Company web site (https://www.asianpaints.com/about-us.html).
5	No expansion or modernization in the project shall be carried out without prior approval of the SEIAA – TN. In case of any deviations or alterations in the project proposal from those	Noted

	submitted to this authority for clearance, a fresh reference shall be made to the SEIAA – TN to assess the adequacy of conditions imposed and to add additional environmental protection measures required if any	
6	All the environmental protection measures and safeguards as recommended in the EIA report shall be complied with	Complied. All Environmental protection measures and safeguards are complied.
7	The implementation of the project vis a vis environmental action plans shall be monitored by the Regional office of MoEF & CC at Chennai TNPCB and CPCB six monthly compliance status report shall be submitted to monitoring agencies regularly	Complied. Half yearly compliance report is being submitted once in 6 months as per the timelines (Annexure 25)
8	Data on ambient air, stack and fugitive emissions shall be regularly submitted online to the Regional office of MoEF & CC, GOI at Chennai, TNPCB and central Pollution control board as well as hard copy once in six months and display data on RSPM, SO ₂ and Nox outside the premises at the appropriate place for the general Public.	Complied. The data on ambient air, stack and fugitive emissions are being submitted once in six months (Annexure 26). Data on SPM, SO ₂ and Nox are displayed near the factory gate for the general Public (Annexure 45)
9	Occupational health surveillance of the workers shall be done on a regular basis and record maintained as per the factories act.	Complied. Occupational health surveillance of the workers is being carried out on regular basis and records are maintained as per the factories act. (Annexure 20).
10	Proper housekeeping and cleanliness must be maintained within and outside plant	Complied. Housekeeping is being done inside and outside the plant. (Annexure 46).
11	Occupational health surveillance programme shall be undertaken as regular exercise for all the employees, especially for those engaged in handling hazardous substances. The first aid facilities in the occupational health center shall be strengthened and the medical records	Complied. Occupational health surveillance programme is being undertaken for all employees specifically for those engaged in handling hazardous substances. The occupational health

	of each employee should be maintained separately.	center is equipped with full-fledged first aid facilities and the medical records of the employees are being maintained. (Annexure 20).
12	The overall noise levels in and around the plant area shall be kept well within the standards prescribed for by providing noise control measures including acoustic hoods, silencers, enclosures etc., on all the sources of noise generation. The ambient noise levels should conform to the standard prescribed under EPA rules, 1989 viz 75 dBA (Day time) and 70 dBA (Nighttime)	Complied. The Overall noise levels in and around the plant area are maintained well within the standards by providing required noise control measures such as acoustic enclosures, silencers on all sources of noise generation. Ambient noise levels were measured by TNPCB Lab and all the measured values are within permissible limits. (Annexure 23)
13	The actual CSR funds utilized in future should at least be 2% of the annual profit but not less than Rs.33.60 Lakh per annum	Complied. The CSR activities were carried out and completed as per the commitment of not less than 33.60 Lakhs per annum. Details are enclosed as annexure 13. All the amounts spent are more than 2% of the annual profit.
14	A separate environmental Management cell equipped with full-fledged laboratory facilities to carry out the various environmental management and monitoring functions shall be set up under the control of a senior executive.	Complied. A separate environmental Management cell equipped with full-fledged laboratory facilities to carry out the various environmental management and monitoring functions is available. (Annexure 14)
15	The requisite amount earmarked towards capital cost and recurring cost / annum for implementing pollution control measures shall be used judiciously to implement the environment management plan as furnished in the EIA report. The funds so provided shall not be diverted for any other purpose.	Noted

16	The project proponent shall upload the status of compliance of the stipulated environmental clearance 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 the MoEF, CC, GOI at Chennai the respective zonal office of CPCB and the SPCB. The criteria pollutant levels namely RSPM, So ₂ , Nox (Ambient levels as well as stack emissions) or critical sector parameters, indicated for the projects shall be monitored and displayed at convenient locations near the main gate of the company in the public domain.	Complied. The status of compliance of the stipulated environmental clearance conditions, including the results of the monitored data are uploaded in the website and simultaneously sent to the regional office of MoEF & CC, respective zonal office. The pollutant levels namely SPM, SOX, NOX (Ambient levels as well as stack emissions) are monitored and displayed near the main gate of the company in the public domain. Additionally we are transmitting the online monitoring data to CPCB server of stack emission. (Annexure 25 & 45).
17	The environmental statement for each financial year ending 31 st March in form V as is mandated to be submitted by the project proponent to the concerned state pollution control Board as prescribed under the Environment (protection) Rules 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental conditions and shall also be sent to the respective regional offices of the MoEF by e mail.	Complied. The environment statement for each financial year ending 31 st March in Form V is being submitted to the concerned state pollution control Board as prescribed under the Environment(Protection)Rules 1986, as amended subsequently and also published in the company website along with the compliance of environmental conditions and the same is being sent to the respective regional offices of the MoEF & CC. (Annexure 26)
18	The environmental Clearance is valid for 7 years from the date of issue	Noted.
19	Environmental clearance is being issued without prejudice to the action initiated under Environment (Protection) Act 1986 or any court case pending or any other court order shall prevail	Noted.

20	The SEIAA TN may alter/modify the above conditions or stipulate any further condition in the interest of Environment protection	Noted.
21	The SEIAA/SEAC or any competent authority may suitably add any further conditions on receiving reports from the project authority. The above condition shall be monitored by the Regional office of MoEF located at Chennai.	Noted.
22	The SEIAA TN may revoke or suspend the Environmental clearance, if implementation of any other above conditions is not satisfactory	Noted.
23	The SEIAA, TN may cancel the environmental clearance granted to this project under the provisions of EIA notification, 2006, if, at any stage of the validity of this Environmental Clearance, if it is found or if it comes to the knowledge of this SEIAA, TN that the project proponent has deliberately concealed and or submitted false or misleading information or inadequate data or submitted misleading information or inadequate data for obtaining the Environmental clearance.	Noted.
24.	Failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act 1986.	Noted.
25	This SEIAA – TN reserves the right to stipulate additional conditions if found necessary. The industry in a time bound manner shall implement these conditions	Noted.
26	The above conditions will be enforced inter alia, under the provisions of the Water (Prevention & Control of Pollution) Act 1974, the Air (Prevention and Control of Pollution) Act 1981, The Environment Protection Act 1986, the Public Liability Insurance Act 1991, along with their amendments draft minor	Noted.

	mineral conservation & development rules – 2010 framed under MMDR Act 1957, national commission for protection of Child Right Rules 2006 and rules made there under and also any other orders passed by the hon'ble supreme court of India Hon'ble High Court of Madras and any other courts of law relating to the subject matter.	
27	Any appeal against this environmental clearance shall lie with the Hon'ble national green tribunal, if preferred, with in a period of 30 days as prescribed under section 16 of the National Green Tribunal Act 2010.	Noted.

COMPLIANCE REPORT FOR ENVIRONMENTAL CLEARANCE

Compliance to the Conditions stipulated in the Environmental Clearance for Asian Paints Limited, Penta Division issued by MOEF&CC on 29.11.2022 for the period (October 2025 to March 2026)

Reference Letter No. File No. IA-J-11011/283/2021-IA-II(I) Date: 29/11/2022

Specific Conditions:

S. No	Condition	Compliance
1.	The operating parameters shall be maintained so that the stack emissions comply with the prescribed norms i.e. PM < 50 ppm; SOx < 600 mg/Nm ³ ; NOx < 300 mg/Nm ³ . Boiler stack emissions shall be maintained as per TPP guidelines for units installed after 1st Jan. 2003 to 31st Dec. 2016	Complied We are monitoring Stack Emissions parameters through TNPCB laboratory and a MoEF&CC approved laboratory. To ensure the emission parameters are within the prescribed limits, we are conducting monthly stack monitoring test with MOEF&CC approved laboratory, and the report is being submitted to TNPCB periodically. Boiler stack emissions are maintained as per TPP guidelines. (Report enclosed as Annexure 1)
2.	Continuous online (24x7) monitoring system for stack emissions shall be provided for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB servers.	Complied. We have Continuous online monitoring system for stack emission and Continuous Ambient Air Quality Monitoring Station (CAAQMS) to measure the flue gas discharge and the pollutants concentration. We ensure uninterrupted data connectivity with the OCEMS of TNPCB and CPCB. (Photos enclosed as Annexure 2)
3.	Cyclone separators and Bag filters shall be provided for effective fugitive emission control. Covered pneumatic system and Silo shall be provided for transport and storage of ash.	Complied. We have provided multi-cyclone separator with Bag Filters for fugitive emission control in Boiler. Also, we have installed a covered pneumatic system and silo for transport storage of ash (Photo enclosed as Annexure 3)
4.	The transportation of materials shall be by rail/belt conveyor, to the extent feasible	Complied. Raw material and finished goods are transported by Road. Inside the factory premises, Materials are transported by belt conveyor. (Photos attached as Annexure 4)
5.	Industry shall use biomass as Primary Fuel for Boiler and only in case of shortage of Briquettes, coal/lignite may be used as secondary fuel. Further, efforts shall be made for the usage of natural gas.	Complied We are using Low ash and Low Sulphur content coal for boilers. Solid biofuel is used whenever it is feasible. We used 49.15 MT of biofuels is used for October 2025 to March 2026.

6.	The PP shall ensure that best available technology is used.	Complied • Fluidized bed combustion boiler is used to maximize the fuel combustion. • Spent steam from turbine is used for processing plant. • After giving heat duty, saturated steam as condensate is returned to Boiler as feed water. • State-of-the-art technology centrifuges are used for best technology separation process. • Recycle and reuse of process materials are effectively carried out. • Vapour absorption machine is used for effective refrigeration of heat transfer is implemented. • RO permeate water recovered from effluent treatment plant is reused for cooling tower makeup purpose.
7.	The PP shall increase the existing greenbelt of 37% to at least 40 % of total area by planting 570 number of trees within a period of one year from grant of EC. The saplings selected for the plantation should be of sufficient height, preferably 6-ft (about 2m). The budget earmarked for the plantation shall be ₹2 Lakh and shall be kept in separate account and should be audited annually. The PP should annually submit the audited statement along with proof of activities viz. photographs (before & after with geo-location date & time), details of the expert agency engaged, details of species planted, number of species planted, survival rate, density of plantation etc. to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.	Complied. Greenbelt is developed in and around the premises with native species, which are planted and maintained at specific intervals as per the prescribed requirements. Out of the total plot area of 10.807 hectares, approximately 6.156 hectares (about 40% of the total area) is designated as a greenbelt. 6 ft height sapling are selected and planted. We are maintaining separate account and internal auditors is auditing annually. Along with half yearly compliance report, all the above-mentioned details are submitted to the regional office of MOEF&CC before 1st July. (Photos enclosed as annexure 5, 6, 7)
8.	In addition to the above, 1200 number of saplings shall be planted in the next 2 years such as avenue plantation, plantation in vacant areas, social forestry, etc.	Complied. We have planted an adequate number of saplings in and around the premises, including avenue plantations, vacant area plantations. Additional trees will be planted to further enhance green cover. 1181 no's of Tree saplings are planted in Apr-Mar 2026 Period. Photos enclosed as annexure 7.
9.	The transportation load on roads shall be within their carrying capacity and adequate	Complied. Proper and adequate width of roads maintained for transportation.

	width of the roads shall be maintained inside the industrial premises.	Separate entry and exit gates are provided. Speed limits are implemented and controlled within the site. Enclosed as annexure 8.
10.	The treated effluent (Process & Utility) from ETP, RO and MEE shall be reused in the process and the treated effluent from the STP shall be used for green belt etc. Zero Liquid Discharge shall be maintained.	Complied The treated effluent is reused for cooling tower makeup, ensuring that our unit is maintaining zero liquid discharge system (ZLD) (Enclosed as Annexure 9). The Effluent Treatment Plant operates efficiently and continuously to achieve ZLD. Appx. 45 KLD of sewage generated from the premises is treated in the Sewage Treatment Plant and the treated sewage water is utilized for greenbelt development (Enclosed as Annexure 5 & 30).
11.	Continuous monitoring of effluent quality/quantity shall be provided along with installation of web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.	Complied We continuously monitor and calibrate the online sensors for effluent parameters. We installed web cameras with night vision capability and flow meters in the channel/drain carrying effluent within the premises. (Annexure 10)
12.	The storm water from the roof top shall be channelized through pipes to the storage tank constructed for harvesting of rain water in the premises and harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.	Complied We have provided two stormwater drains for rainwater harvesting within the premises. There is no any recharge permitted within the factory premises. Additionally, we continuously monitor and maintain the online pH and TDS meters in these drains to ensure no chemical contamination occurs during rainfall beyond the premises (Photos enclosed as Annexure 11)
13.	Fly ash shall be utilized as per the fly ash utilization notification from time to time.	Complied Fly ash generated from the boiler is stored in the separate closed fly ash yard. The unit ensures 100% utilization of fly ash through authorized brick manufacturers for beneficial reuse, in compliance with applicable regulatory requirements.
14.	Distillation residue/ spent carbon shall be sent for co-processing as per Hazardous waste authorisation. Used or spent oil / waste or residue containing oil shall be sent to authorised recyclers as per Hazardous waste authorisation.	Complied. We have obtained HW Authorization vide Authorization No. 25HFC63824221 dated 27/02/2025 with valid up to 31.03.2029. Hazardous waste generated from the unit premises is properly collected, segregated and disposed to authorized TSDF/Recycler as per HW authorization obtained.

15.	Monitoring of compliance of EC conditions shall be submitted with third party audit every year.	Complied. Third party audit of EC compliance conducted in October 2025 and the report is enclosed as Annexure 12.
16.	Provision of Safe drinking water supply, sanitation & medical facilities, promoting eco-friendly behaviour through use of Green Energy in schools etc. shall be done within the study area under the CER.	Complied. We have complied with the requirements and provided safe drinking water, sanitation, and medical facilities to nearby government schools & villages. The details of expenditures incurred for Corporate Environmental Responsibility (CER) have enclosed as Annexure 13.
17.	A separate Environmental Management Cell (having qualified persons with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions. PP shall engage Senior Manager – Environment & Quality Assurance, Senior Executive Environment, Manager safety, safety engineer, Environment Lab Officer. In addition to this one safety & health officer as per the qualification given in Factories Act 1948 shall be engaged within a month of grant of EC. The PP should annually submit the audited statement of amount spent towards the engagement of qualified persons in EMC along with details of person engaged to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.	Complied A dedicated Environmental Management Cell, staffed with suitably qualified personnel, has been established under the supervision of a Senior Executive, who will report directly to the Head of the Organization. Annual audit statement of amount spent towards the engagement of qualified persons in EMC cell will be submitted within 1 st July 2026. (EMC staff chart enclosed as annexure 14).
18.	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented. The budget proposed under EMP is ₹432 lakhs (Capital cost) and ₹681.97 lakhs (Recurring cost) shall be kept in separate account and should be audited annually. The PP should submit the annual audited statement along with proof of implementation of activities proposed under EMP duly supported by photographs (before & after with geo-location date & time) and other document as applicable to the	Complied. The environmental protection measures and safeguards proposed in the documents submitted to the ministry are being complied with. An annual audited statement, along with proof of the implementation of activities carried out during the previous year, is being maintained. The Environmental Management Plan (EMP) budget will be kept in a separate account (Account statement enclosed as annexure 06 & EMP Cost).

	Regional Office of MoEF&CC before 1st July of every year for the activities carried out during the previous year.	
19.	The total water requirement of 1694 KLD, of which fresh water requirement is 1500 KLD shall be met from SIPCOT water supply. The PP should ensure that water supply should not be above the permissible limit as mentioned in the letter and fresh water shall be withdrawn only after obtaining valid agreement from Concerned Authority. The PP should submit the details of utilization to the Integrated Regional Office (IRO), MoEF&CC before 1st July of every year for the activities carried out during the previous year.	Complied. The total water requirement of 1,694 KLD will not be exceeded at any point. The fresh water requirement is being met through SIPCOT, and it will not surpass the approved quantity. Every six months fresh water utilization has been submitting in half yearly compliance and the utilization within 1500 KLD. Fresh water utilization details enclosed as annexure 15.
20.	No banned chemicals shall be manufactured by the PP. No banned raw materials shall be used in the unit. The PP shall adhere to the notifications/guidelines of the Government in this regard.	Complied. No banned chemicals or raw materials are used or manufactured within the premises.
21.	The PP shall utilize modern technologies for capturing of carbon emitted and shall also develop carbon sink/carbon sequestration resources capable of capturing more than emitted. The implementation report shall be submitted to the IRO, MoEF&CC in this regard.	Complied. A greenbelt is being developed in and around the premises with native species, planted and maintained at specific intervals in accordance with prescribed requirements to aid in the capture of carbon emissions (Enclosed as Annexure 16)
22.	The project proponent shall comply with the environment norms for Organic Chemical Industry as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 1241(E), dated 28.12.2018 under the provisions of the Environment (Protection) Rules, 1986.	Complied. We are complying with the environment norms for Organic Chemical Industry as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 1241(E), dated 28.12.2018 under the provisions of the Environment (Protection) Rules, 1986. To ensure, analysis conducted through MOEF approved laboratory and all the prescribed parameters are under the limit. (Reports enclosed as annexure 1)
23.	All necessary precautions shall be taken to avoid accidents and action plan shall be implemented for avoiding accidents. The PP shall implement the onsite/offsite emergency plan/mock drill etc. and mitigation measures as prescribed under the rules and guidelines issued in the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996.	Complied. We have implemented a comprehensive firefighting plan along with all required safety measures. Onsite emergency plans, including mock drills and mitigation measures, are being carried out every six months in accordance with the rules and guidelines issued by the Directorate of Industrial Safety and Health (DISH). Awareness training programs and periodic mock drills conducted regularly (Enclosed

		as Annexure 17)
24.	The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.	Complied The inventories are maintained with bare minimum quantity to run the unit on continuous basis. All the precautions are complied as per toxic hazardous storage rules. With the best available technology like dynamic wet scrubber, dust collector & bag filter VOCS / fugitive emissions are controlled. Regular monitoring of VOCs are carried out by MOEF&CC approved laboratory and ROA of same is periodically submitted to TNPCB (Enclosed as Annexure 18)
25.	The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.	Complied. Toxic/ Hazardous chemical and raw material stored in separate tanks with adequate capacity maintained within the storage limit. Quantity and inventory details are submitted in half yearly compliance report regularly (Enclosed as Annexure 19)
26.	The occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.	Complied OHC is available at site. Periodical medical examination of the workers conducted and records are maintained. The workers were provided with personnel protective measures such as masks, gloves, boots etc. and usage is monitored through work permit system. (Enclosed as annexure 20)
27.	Training shall be imparted to all employees on safety and health aspects for handling chemicals. Safety and visual reality training shall be provided to employees. Action plan for mitigation measures shall be properly implemented based on the safety and risk assessment studies.	Complied Adequate training has been provided to all employees on safety and health aspects related to chemical handling. Hazardous areas are managed exclusively by trained personnel. The action plan for mitigation measures has been implemented and is being maintained to ensure safety and minimize risks (Enclosed as annexure 21)
28.	The unit shall make the arrangement for the protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.	Complied A firefighting plan and all required safety measures have been implemented in accordance with established norms. Additionally, an automatic water sprinkler system, foam pourer, and deluge valve-controlled sprinkler system have been installed (Enclosed as Annexure 17)
29.	The solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have	Complied a. Reactor vent is connected to the common vent collection system.

	mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	b. Mechanical seal is available in all pumps. c. Chemicals like acetaldehyde and methanol stored in separate storage tanks with adequate safety measures such as dyke valve, SRV's, Rupture disk, Level indicators, LEL detectors, break away couplings. d. Proper earthing system is available. e. Flame proof electrical fittings provided. Breather valve installed in the storage tank. f. Storage tank vent is connected the common vent collect system.
30.	The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.	Complied. We are using best available technologies deployed to control VOC emissions in the process. We are periodically conducting Ambient TVOC/THC surveys through a TNPCB laboratory or a NABL-accredited laboratory. The Results of Analysis have been regularly submitted to the Tamil Nadu Pollution Control Board (Enclosed as Annexure 18)
31.	The PP shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapour recovery system. (f) Use of high pressure-hoses for equipment cleaning to reduce wastewater generation.	Complied. a. All ingredients to process are added through measurement devices like magnetic flow meter and load cell. b. Unreacted raw materials recovered and reused in the process to avoid wastages. c. All ingredients to process are added through a measurement devices like magnetic flow meter load cell and only required quantity of the material taken for consumption. Control valves with inter locks installed to automatically stop the inputs to avoid spillages. d. All inputs to the process are closed loop system compressing of pumps, valves, flow measurement devices and pipelines. e. Common vent collection system available to collect and to reuse the vent. f. High pressure hose is used for cleaning operations and the water is reused in the process and by this waste water generation is

		eliminated.
32.	The activities and the action plan proposed by the project proponent to address the issues raised during the public hearing as well as the related socio-economic issues in the study area shall be completed as per the schedule presented before the Committee and as described in the EIA report in letter and spirit.	Complied. Public Hearing is exempted as the industry falls in notified industrial area however, activities and action plants as proposed in EIA report being complied.

GENERAL CONDITIONS:

S. No	Condition	Compliance
1.	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	Complied. In case any changes in the project we will apply for fresh appraisal. All Environmental protection measures are implemented and maintained continuously.
2.	The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans - Boundary Movement) Rules, 2016 and other rules notified under various Acts.	Complied. On site emergency plan available. Mock drill conducted once in six month. Internal Safety audit conducting annually. Hazardous waste stored and disposed as per Hazardous Waste Management Rules 2016 (Annexure 17).
3.	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.	Complied. We are using CFL/LED lamps for lighting inside our campus. (Photos enclosed as Annexure 22)
4.	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,	Complied Noise level within the project site around the plant area being maintained as per the CPCB guidelines during Day/Night time.

	enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).	Greenbelts developed to attenuate the noise. The acoustic enclosures are installed for reducing the noise levels and the noise monitoring survey is conducting periodically. (Report enclosed as Annexure 23).
5.	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Complied. We have been actively working to improve the socio-economic conditions of the surrounding area. Renovations of four ponds in nearby villages have been completed, and the company operates four health centers in Kudikadu, Karaikadu, Pachaiyankuppam and Eechangadu villages. We are committed to further enhancing the socio-economic conditions of nearby villages (Annexure 13)
6.	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.	Complied. We ensure the funds designated for environmental management and pollution control measures are not diverted for others purposes. The costs associated with the Environmental Management Plan (EMP) account statement is enclosed as annexure 6.
7.	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.	Complied A copy of the environmental clearance has been sent to the local body and is available for reference at any time (Enclosed as annexure 24)
8.	The project proponent shall also submit six monthly reports on PARIVESH portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six-monthly compliance status	Complied. The compliance report on EC conditions, along with monitored data, has been submitted in the Parivesh portal. Additionally, hard and soft copies have been sent to the IRO of MoEF&CC, Chennai, and TNPCB. The same is uploaded on the company website. (Enclosed as annexure 25).

	report shall be posted on the website of the company.	
9.	The environmental statement for each financial year ending 31st 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 compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.	Complied The environmental statement (Form V) for each financial year FY 2024-2025 submitted to the TNPCB, MOEF&CC and uploaded on website with EC Compliance. (Enclosed as Annexure 26).
10.	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at https://parivesh.nic.in/ . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	Complied. We have advertised our environmental clearance in both Tamil and English local newspapers. A copy of the newspaper advertisement has been submitted to the Tamil Nadu Pollution Control Board/ Regional Office of the Ministry (Enclosed as annexure 27)
11.	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.	Duly Noted
12.	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.	Duly Noted
13.	The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental	Duly Noted

	clearance, if implementation of any of the above conditions is not found satisfactory.	
14.	Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.	Duly Noted
15.	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Duly Noted
16.	The above conditions shall be enforced, <i>inter-alia</i> under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts and any other Court of Law relating to the subject matter.	Duly Noted