

# Gujarat Pollution Control Board



## Regional Office-Bharuch

C-1, 119/3, GIDC, Phase-2, Narmadanagar, Bharuch-392015

Website: [www.gpcb.gov.in](http://www.gpcb.gov.in)

### PUBLIC HEARING PROCEEDINGS

It is hereby informed that as per the Ministry of Environment and Forests, Government of India, New Delhi vide its Notification No. S.O. 1533 dated 14/09/2006 and its amendment S.O. 3067 (E) dated 01/12/2009, Public Hearing is arranged for M/s. **Lewens Labs Pvt. Ltd.** for manufacturing of Synthetic APIs – 24.45 MT/month and Bulk Drug Intermediates – 8.15 MT/month at Plot No. D2/CH/376 & 377, GIDC-Dahej, Ta. Vagra, Dist. Bharuch, covered under category “B” as mention in their request application.

A copy of the draft Environment Impact Assessment Report and the Executive Summary of Environment Impact Assessment Report was sent to the following authorities or offices to make available the draft EIA report for inspection to the public during normal office hours, till the Public Hearing is over.

1. The District Collector Office, Bharuch
2. District Development Office, Bharuch
3. District Industry Centre, Bharuch
4. Taluka Development Office, Tal: Vagra, Dist.: Bharuch
5. The Chief Conservator of Forests,  
Ministry of Environment and Forest, GOI, Regional Office (West Zone), Kendriya Paryavaran Bhavan, E-5, Arera Colony, Link Road-3, Ravisankar Colony, Bhopal - 462016.
6. Regional Office, Gujarat Pollution Control Board, Shed No. C-1, 119/3, GIDC, Phase-II, Narmadanagar, Bharuch-392015.

Other concerned persons having plausible stake in environmental aspects were requested to send their responses in writing to the concerned regulatory authorities.

The Public Hearing was held on 29/06/2016 at 10:00 hrs. at Project site of M/s. Lewens Labs Pvt. Ltd., at Plot No. D-2/CH/376 & 377, GIDC-Dahej, Ta. Vagra, Dist.: Bharuch.

An advertisement in English was published in “The Times of India” on 25/05/2016 and in Gujarati in “Gujarat Samachar” dated 25/05/2016.

**B G Prajapati<sup>GAS</sup>, Additional Collector & Additional District Magistrate, Bharuch** supervised and presided over the entire Public Hearing process.

A statement showing participants present during the Public Hearing is enclosed as **Annexure A**.

A statement showing the salient points highlighting issues raised by the participants and responded to by the representative of the applicant during the Public Hearing in English and Gujarati Languages is enclosed as **Annexure B and B1** respectively.

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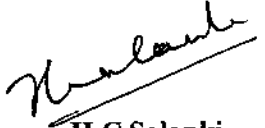



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The copies of responses received in writing from other persons having plausible stake in environmental aspects are enclosed herewith collectively as **Annexure C1 to C5** and the replies by the applicant to the same are enclosed herewith collectively as **Annexure D1 to D5**.

Place: Dahej  
Dist.: Bharuch  
Date: 29/06/2016

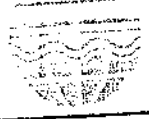
  
H C Solanki  
Regional Officer,  
GPCB, Bharuch as  
representative of the Member  
Secretary, GPCB

  
B G Prajapati <sup>GAS</sup>  
Additional Collector &  
Additional District Magistrate,  
Bharuch

- Encl: 1 Annexure A, B, B1, C1 to C5, D1 to D5 as above.  
2 Video CD/DVD of Public Hearing

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### Annexure-A

#### A statement showing participants present during the public hearing

As per the provision of notification no. S.O. 1533 dated 14/09/2006 and its subsequent amendment S.O. 3067(E) dated 01/12/2009, Ministry of Environment and Forests, Government of India, New Delhi, public hearing is conducted for M/s. Lewens Labs Private Limited, Plot No. D-2/CH/376 & 377, GIDC - Dahej, Ta- Vagra, Dist. Bharuch for proposed manufacturing of Synthetic APIs-24.45 MT/Month and Bulk Drug Intermediate - 8.15 MT/ Month, covered under category 5(f) of "B" as mentioned in their request application.

The statement showing the participants present during the Public Hearing held on 29/06/2016, at 10:00 hrs at Project site of M/s. Lewens Labs Private Limited, Plot No. D-2/CH/376 & 377, GIDC - Dahej, Ta- Vagra, Dist. Bharuch is as under:

ભારત સરકારના વન અને પર્યાવરણ મંત્રાલય, નવી દિલ્હીના જાહેરનામા ક્રમાંક: એસ.ઓ. ૧૫૩૩. તા. ૧૪/૦૯/૨૦૦૬ અને અન્વયે સુધારા સાથેના જાહેરનામા ક્રમાંક એસ.ઓ. ૩૦૬૭ (ઇ). તા. ૦૧/૧૨/૨૦૦૯ ના અનુસંધાને મેસર્સ લેવિન્સ લેબ્સ પ્રાઇવેટ લિમિટેડ પ્લોટ નં. ડી-૨ સીએચ/૩૭૬ અને ૩૭૭, જીઆઇડીસી દહેજ જી: ભરૂચ, સ્થળ પર એપીઆઇ (એક્ટીવ ફાર્માસ્યુટીકલ ઇન્ટરિડીયન્ટ) -૨૪.૪૫ મે.ટન પ્રતિ માસ અને બલ્ક ડ્રગ ઇન્ટરમીડીએટ - ૮.૧૫ મે.ટન પ્રતિ માસ ઉત્પાદન ક્ષમતા માટેની પરિયોજના (પ્રોજેક્ટ) કેટેગરી ૫ (ફ) - "બ" માં આવરી લેવાયેલ છે. જે માટેની લોક સુનાવણી ૨૯/૦૬/૨૦૧૬ ના રોજ સમય ૧૦:૦૦ કલાકે પ્રોજેક્ટ સ્થળ પર, મેસર્સ લેવિન્સ લેબ્સ પ્રાઇવેટ લિમિટેડ પ્લોટ નં. ડી-૨ સીએચ/૩૭૬ અને ૩૭૭, જીઆઇડીસી દહેજ જી: ભરૂચ ખાતે રાખવામાં આવેલ છે.

લોક સુનાવણી દરમિયાન હાજર રહેલા લોકોની યાદી નીચે મુજબ છે:

Sr. No. ક્રમાંક	Name & Designation નામ અને હોદ્દો	Organization/Village સંસ્થા/ગામ	Sign સહી
①	શ્રી. વી. મહેતા.	ભોલાવ.	
②	Kamlesh Udani	Bharuch	
3	Karnal Shah	Bharuch	

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Sr. No. ક્રમાંક	Name & Designation નામ અને હોદ્દો	Organization/Village સંસ્થા/ગામ	Sign સહી
4	Pooja Udani	Bharuch	
5	Patel M. Y.	સરદાર સુભાષી કાંચી	
6	Motika Udani	Bharuch	
7	DR. C.B. UPADHAY	ANKLASHWAR	
8	Patel Ankit.	Ankleshwar.	
9	MR S.T. PATEL	ANKLASHWAR	
10	J. B. S. S. S.	ANKLASHWAR	
11	Pravin Mehta	સરદાર સુભાષી	
12	Dr. Ankur V. Dahiya	Bharuch	
13	Gurpreet S. Patel	Ankleshwar	
14	Nishant Pruthi	Bharuch	
15	Parthasarathy	Bharuch	
16	Raghuvar	Bharuch	
17	Kamlesh Patel	Rathiyas	
18	Parbhaseelan Das	Lakshmi	
19	સરદાર સુભાષી	સરદાર સુભાષી	
20	Ajay Kumar	Panoli	
21	Shrik	ANK	
22	Dharmesh Mishra	Bharuch	
23	Jignesh Dangekar	Gujarat Guardium Bharuch	

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Sr. No. ક્રમાંક	Name & Designation નામ અને હોદ્દો	Organization/Village સંસ્થા/ગામ	Sign સહી
24	Daiwat Joshi (Environment Engrg)	Spoti Om Chemical Research Centre	
25	Jayesh Gandhi	Uma Infotech	
26	Jibendra Patel	Ankleshwar	
27	Mehar Singh	Parkashwari Patil	
28	R.m. Padhye	Rahiyad	
29	Sandeep + paree	Bharuch	
30	Ashok m. Gohil	Sura	
31	N. N. N.	11	
32	Bhavik N Gohil	Sura	
33	Pritesh N Gohil	11	
34	gohil Akash. N	11	
35	gohil bhargavsinh. B	11	
36	Yogesh. Jeeva	Bharuch	
37	Jayram B Jeeva	Bharuch	
38	K. P. Patel	Bharuch	
39	Ranjit. B. Marwaha	WAV	
40	Govind M. Marwaha	WAV	
41	Jaykumar Sharma	Bharuch	
42	Kavita. M. Padhye	BHARUCH	
43	Diti. Patel	San Envirotech	



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**ANNEXURE – B (English)**

**A statement showing issues raised by the participants and responses by the representative of the applicant during the Public Hearing**

As per the provision of Notification No. S.O. 1533, dated 14/09/2006 and its amendment S.O. 3067 (E) dated 01/12/2009, Ministry of Environment and Forest, Government of India, New Delhi, Public Hearing is conducted for of M/s. Lewens Labs Pvt. Ltd., Plot No. D2/CH/376 & 377, GIDC-Dahej, Ta. Vagra, Dist. Bharuch for manufacturing of Synthetic APIs – 24.45 MT/month and Bulk Drug Intermediates – 8.15 MT/month. The Public hearing is held on 29.06.2016 at 10:00 hrs. at Project site of M/s. Lewens Labs Pvt. Ltd., at Plot No. D-2/CH/376 & 377, GIDC-Dahej, Ta. Vagra, Dist.: Bharuch, which is covered under category “B” of above referred Notification.

Shri B G Prajapati<sub>GAS</sub>, Additional Collector & Additional District Magistrate, Bharuch and Chairman of Public Hearing committee has presided over the entire Public Hearing process.

Shri H C Solanki, Regional officer, Gujarat Pollution Control Board, Bharuch and representative of the Member Secretary, GPCB – a panel member of the Public Hearing Committee; welcomed all present to the Public Hearing. He outlined the various provisions of the Notification and briefed about the procedural details for conducting this Public Hearing. He further informed about the actions taken by Gujarat Pollution Control Board for wide publicity of this Public Hearing and the advertisement given earlier in the local daily newspaper. He announced that as per the provision of Notification, only locally affected persons will be allowed to make their representation in writing which would be included in proceedings. He also made it clear to the gathering that the Committee is responsible only for preparation of proceedings of the meeting covering all the concerns raised during the Public Hearing.

He then opened the forum of Public Hearing after due permission of Additional District Collector & Chairman of Public Hearing. He then invited the project proponent to give their introduction and to make the presentation of their project in local language.

The representative of the project proponent welcomed the gathering. Then after, he made presentation in Gujarati language covering introduction of the company, technical information about project, information on baseline environment, impact due to project and its mitigation measures, safety measures and benefits due to the proposed project etc.

After the presentation, Regional Officer, GPCB, Bharuch with due permission of the Additional Collector, opened the forum for representations/suggestions/objections from the locally affected people, if any.

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The statement showing issues/suggestions/objections/opinion raised by the participants during Public Hearing and responded to by the representative of the applicant during Public Hearing are as under:

Sr. No.	Name and Address	Point Represented and/or written submission	Replies by representative of Project Proponent	Replies given by Panel Member
1.	Mr. Ranjit Padhiyar, Village: Rahiyad	<ul style="list-style-type: none"><li>• How many manpower requirements in this unit and how many local people will get employment?</li><li>• Is there any provision to conduct two Public Hearing on same day? Is there any guideline/rules?</li></ul>	<ul style="list-style-type: none"><li>• Representative of company informed that, around 60 nos. of employment opportunity in this unit; out of which, 80% of unskilled local people will get employment on priority base.</li></ul>	<ul style="list-style-type: none"><li>• Regional officer informed that, yes, two Public Hearing can be conducted on same day as per the guideline of Public Hearing. In addition to this, this decision is taken by District Collector.</li></ul>
2.	Mr. Naresh Gohil Village: Suva	<ul style="list-style-type: none"><li>• We welcome the project which resulted to benefit of our country and hope to complete the dream of Make in India.</li><li>• He informed that, he has attended many Public Hearing and in the all Public Hearing they were give the commitment for employment to local people but didn't complete it. What company will do in this matter?</li></ul>	<ul style="list-style-type: none"><li>• Representative of the company informed that, we will give opportunity to 80% unskilled employee of surrounding and skilled employee will be get priority based on</li></ul>	



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Sr. No.	Name and Address	Point Represented and/or written submission	Replies by representative of Project Proponent	Replies given by Panel Member
		<ul style="list-style-type: none"><li>• What is the meaning of local people in your language?</li><li>• Our land is situated in this region. However, since last 20 years, I have not get employment. Pls. note this point.</li><li>• Relatives of higher officer of the company are getting employment whereas local people are not employing? Give priority to land losers.</li></ul>	<p>qualification and experience.</p> <ul style="list-style-type: none"><li>• As per our interpretation, first priority is to local affected villagers, second priority is to people from Tehsil &amp; District and third from state of Gujarat.</li></ul>	<ul style="list-style-type: none"><li>• Regional Officer informed that, unit has to give the first priority to local people if 2 employees have similar qualification &amp; experience.</li><li>• Chairman informed that, Collector Office has developed the software regarding information of around 2899 land losers and this information is provided to GIDC. Issue to land loser is comes under responsibility of GIDC. In this matter,</li></ul>

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Sr. No.	Name and Address	Point Represented and/or written submission	Replies by representative of Project Proponent	Replies given by Panel Member
		<ul style="list-style-type: none"><li>• He asked that, how many harmful chemicals will be used in the plant and what precaution will be taken by the unit?</li><li>• He informed that, unit has carried out plantation activity as part of CSR and arrange medical and blood camp in surrounding. If above presentations are taken by unit positively, then we welcome the project.</li></ul>	<ul style="list-style-type: none"><li>• In our unit, many solvents will be used and we will take care how to handle it and same is also reported in Risk Assessment, Chapter-7 of our EIA report. After commission of our unit, we will inform our employee and surrounding people regarding Hazardousness of chemicals.</li><li>• We welcome your suggestion and committed to implement it.</li></ul>	industrialist has to approach GIDC regarding information of land losers.

The Regional Officer, GPCB, Bharuch further informed the forum that, five written representations were received prior to Public Hearing. The first was received from Shri Jitendrakumar Babalbhai Patel, Ankleshwar, second from Shri Mahesh Pandya, Paryavaran Mitra, Ahmedabad, third from Shri Dharmesh Mistry, Bharuch, fourth from Shri Pravinbhai Sheth, Ankleshwar and fifth from Shri Vinod M. Jadav, Bharuch which would be included in the proceedings along with the reply of project proponent.

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The Public Hearing was concluded with the vote of thanks.

Place: Dahej  
Dist.: Bharuch  
Date: 29/06/2016

**H C Solanki**  
Regional Officer,  
GPCB, Bharuch as  
representative of the Member  
Secretary, GPCB

**B G Prajapati** GAS  
Additional Collector &  
Additional District Magistrate,  
Bharuch

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એનેક્સર - બી ૧ (ગુજરાતી)

લોક સુનાવણી દરમ્યાન હાજર લોકો દ્વારા રજૂ કરવામાં આવેલ મુદ્દાઓ અને અરજદારના પ્રતિનિધિ દ્વારા આપવામાં આવેલ જવાબ

ભારત સરકારના વન અને પર્યાવરણ મંત્રાલય, નવી દિલ્હીના જાહેરનામા ક્રમાંક: એસ.ઓ. ૧૫૩૩, તા. ૧૪/૦૯/૨૦૦૬ અને તેના પછીના સુધારાક્રમાંક એસ.ઓ. ૩૦૬૭ (ઇ), તા. ૦૧/૧૨/૨૦૦૯ ના અનુસંધાને મે. લેવીન્સ લેબ્સ પ્રાઇવેટ લિમિટેડ, પ્લોટ નં ડી-૨/સીએચ/૩૭૬ અને ૩૭૭, દહેજ, જીઆઇડીસી, તા. વાગરા, જી. ભરૂચ ખાતે સીન્થેટીક એપીઆઇ - ૨૪.૪૫ મેટ્રીક ટન/માસ અને બ્લક ડ્રગ્સ ઇન્ટરમીડીએટ - ૮.૧૫ મેટ્રીક ટન/માસ ની ઉત્પાદન ક્ષમતા માટેની પરિયોજના કેટેગરી "બી" માં આવરી લેવાયેલ છે. જે માટેની લોક સુનાવણી તા: ૨૯/૦૬/૨૦૧૬ ના રોજ ૧૦:૦૦ કલાકે પ્રોજેક્ટ સ્થળ પર, મે. લેવીન્સ લેબ્સ પ્રાઇવેટ લિમિટેડ, પ્લોટ નં ડી-૨/સીએચ/૩૭૬ અને ૩૭૭, દહેજ, જીઆઇડીસી, તા. વાગરા, જી. ભરૂચ ખાતે રાખવામાં આવેલ.

સમગ્ર લોકસુનાવણીની કાર્યવાહી બી. જી. પ્રજાપતિ, અધિક જીલ્લા કલેક્ટર અને અધિક જીલ્લા મેજિસ્ટ્રેટશ્રી, ભરૂચની દેખરેખ તથા અધ્યક્ષપણા હેઠળ કરવામાં આવેલ.

શ્રી એચ સી સોલંકી, પ્રાદેશિક અધિકારી, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, ભરૂચ અને સભ્ય સચિવશ્રી, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડના પ્રતિનિધિ એ લોક સુનાવણીમાં ઉપસ્થિત સૌને આવકાર્યા અને ઇઆઇએ નોટીફિકેશન અંતર્ગત વિવિધ જોગવાઇઓ અને લોક સુનાવણી પ્રક્રિયા અંગે માહિતિ આપી. તેમણે બોર્ડ દ્વારા આ લોક સુનાવણીની બહોળી પ્રસિધ્ધિ માટે લેવાયેલ જુદા જુદા પગલાં બાબતે સૌને માહિતગાર કર્યાં. તેઓએ સ્થાનિક દૈનિક વર્તમાન પત્રોમાં જાહેરખબર આપીને કરવામાં આવેલ જાહેરાત અંગે પણ માહિતિ આપી. વધુમાં તેઓએ જાહેરાત કરી કે સદર નોટીફિકેશનની જોગવાઇ અનુસાર ફક્ત સ્થાનિક અસરગ્રસ્ત લોકો આ સુનાવણીમાં મૌખિક રજૂઆત કરી શકશે, જ્યારે વ્યાજબી હિત ધરાવતી અન્ય વ્યક્તિઓ તેઓની રજૂઆત લેખિતમાં કરી શકશે. જેનો કાર્યવાહી નોંધમાં સમાવેશ કરવામાં આવેલ છે. તેઓએ સ્પષ્ટતા કરી કે આ લોક સુનાવણી સમિતિ, સુનાવણી દરમ્યાન રજૂ થયેલ દરેક બાબતોને આવરી લઇને કાર્યનોંધ તૈયાર કરવા માટે જ જવાબદાર છે.

ત્યારબાદ તેમણે અધિક જીલ્લા કલેક્ટરશ્રી અને અધ્યક્ષશ્રી ની પરવાનગીથી લોક સુનાવણીનો પ્રારંભ કર્યો. તેઓએ પ્રોજેક્ટ પ્રોપોનન્ટશ્રીને તેમની સૂચિત પરિયોજના વિશે સ્થાનિક ભાષામાં માહિતિ રજૂ કરવા જણાવેલ.

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મેસર્સ લેવીન્સ લેબ્સ પ્રા. લિ. ના પ્રતિનિધિ દ્વારા કંપનીનો પરિચય, પ્રોજેક્ટની રૂપરેખા, ઉત્પાદન અંગેની માહિતિ, પ્રોજેક્ટની ટેકનીકલ માહિતિ, પર્યાવરણીય વ્યવસ્થાપન પદ્ધતિ, તેની અસરો અને સૂચિત નિયંત્રણો, ઉપાયો તથા સામાજિક જવાબદારી પરત્વેની કામગીરી અંગે ગુજરાતી ભાષામાં પ્રેઝન્ટેશન કરવામાં આવ્યું.

પ્રોજેક્ટ પ્રોપોઝન્ટ ના પ્રતિનિધિ દ્વારા રજૂઆત પૂર્ણ થયા બાદ, પ્રાદેશિક અધિકારીશ્રી, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ દ્વારા અધિક જિલ્લા કલેક્ટરશ્રી ની પરવાનગીથી સ્થાનિક અસરગ્રસ્ત લોકોની રજૂઆતો/વાંધાઓ/સુચનો માટે મંચ ખુલ્લો મુકવામાં આવ્યો.

લોક સુનાવણી દરમ્યાન હાજર રહેલ લોકો દ્વારા મૌખિકમાં રજુ કરવામાં આવેલ પ્રશ્નો/વાંધાઓ/ સૂચનો/મંતવ્ય તેમજ અરજદારના પ્રતિનિધિ દ્વારા આપવામાં આવેલ પ્રત્યુત્તરો નીચે મુજબ છે:

ક્રમ	મુદ્દો રજૂ કરનારનું નામ અને ગામ	રજૂ કરેલ મુદ્દાઓ	પરિયોજનાના પ્રતિનિધી દ્વારા આપવામાં આવેલ પ્રત્યુત્તર	રિમાર્ક્સ
૧	શ્રી રણજીત પહિયાર, ગામ: રહીયાદ	<ul style="list-style-type: none"><li>આ એકમમાં કેટલી માનવ શક્તિની જરૂરિયાત ઉભી થશે? સ્થાનિક કેટલા લોકોને રોજગારી મળશે?</li><li>એક જ દિવસે બે કંપનીની લોક સુનાવણી થઈ શકે? તેવો કોઈ નિયમ છે કે નહિ?</li></ul>	<ul style="list-style-type: none"><li>એકમના પ્રતિનિધિ એ જણાવ્યું કે આ એકમમાં કુલ ૬૦ લોકોને રોજગારી મળશે. જેમાંથી ૮૦% બીનકુશળ સ્થાનિક લોકોને પ્રાધાન્ય આપવામાં આવશે.</li></ul>	<ul style="list-style-type: none"><li>પ્રાદેશિક અધિકારીશ્રી એ જણાવ્યું કે હા, લોક સુનાવણીની માર્ગદર્શિકા મુજબ એક જ દિવસે બે લોકસુનાવણી થઈ શકે છે. તથા આ બાબતે માનનીય જિલ્લા કલેક્ટર</li></ul>

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ક્રમ	મુદ્દો રજૂ કરનારનું નામ અને ગામ	રજૂ કરેલ મુદ્દાઓ	પરિયોજનાના પ્રતિનિધી દ્વારા આપવામાં આવેલ પ્રત્યુત્તર	રિમાર્ક્સ
				સાહેબશ્રી ની સુચના પ્રમાણે નિર્ણય કરેલ છે.
૨	શ્રી નરેશ ગોહિલ, ગામ: સુવા	<ul style="list-style-type: none"><li>અમે આ પ્રોજેક્ટને આ આવકારીએ છીએ, તેનાથી દેશને લાભ થશે. તેનાથી મેઇક ઇન ઇન્ડિયાનું સપનું સાકાર થાય એવી આશા છે.</li><li>તેમણે જણાવ્યું કે તેઓ ઘણી લોક સુનાવણીમાં હાજરી આપે છે અને દરેક લોક સુનાવણીમાં સ્થાનિક લોકોને રોજગારી આપવાની બાંહેધરી પણ આપવામાં આવે છે છતાં સ્થાનિક લોકોનો રોજગારીમાં સમાવેશ થતો નથી. આ બાબતમાં આપની કંપની શું કરવા માંગે છે તે જણાવો.</li><li>તમારી ભાષામાં સ્થાનિક લોકો એટલે શું?</li></ul>	<ul style="list-style-type: none"><li>એકમના પ્રતિનિધિ એ જણાવ્યું કે અમો ૮૦% બિન કુશળ સ્થાનિક લોકોને રોજગારીમાં પ્રાધાન્ય આપીશું. તથા કુશળ સ્થાનિક રોજગારીને લાયકાત અને અનુભવ પ્રમાણે પ્રાધાન્ય આપવામાં આવશે.</li><li>અમારી ભાષામાં સ્થાનિક લોકો એટલે પ્રથમ સ્થાને અસરગ્રસ્ત ગામના લોકો બીજા સ્થાને તાલુકા જીલ્લા કક્ષાના લોકો અને ત્રીજા</li></ul>	

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ક્રમ	મુદ્દો રજૂ કરનારનું નામ અને ગામ	રજૂ કરેલ મુદ્દાઓ	પરિયોજનાના પ્રતિનિધી દ્વારા આપવામાં આવેલ પ્રત્યુત્તર	રિમાર્ક્સ
		<ul style="list-style-type: none"><li>અમારી જમીન આ જ વિસ્તારમાં છે છતાં મને ૨૦ વર્ષથી નોકરી મળતી નથી આ વાતની ખાસ નોંધ લેજો.</li><li>કંપનીના ઉચ્ચ અધિકારીના સગાસંબંધીને નોકરી મળે છે જ્યારે સ્થાનિક લોકોને રોજગારી મળતી નથી. લેન્ડ લૂઝર્સને પ્રથમ પ્રાધાન્ય આપવું જોઈએ.</li></ul>	સ્થાને ગુજરાત રાજ્યના રહીશોનો સમાવેશ થાય છે.	<ul style="list-style-type: none"><li>પ્રાદેશિક અધિકારીશ્રી એ જણાવ્યું કે બે ઉમેદવાર કે જેની લાયકાત અને અનુભવ સરખા હોય તો એકમમાં સ્થાનિક ઉમેદવારને પ્રથમ પ્રાધાન્ય આપવામાં આવે.</li><li>અધ્યક્ષ સ્થાનેથી જણાવવામાં આવેલ કે ૨૦૧૯ જેટલા લેન્ડ લૂઝર્સનો રેકોર્ડ અને તેની માહિતી કલેક્ટર ઓફિસમાં સોફ્ટવેરમાં નાંખવામાં આવેલ છે અને તેની માહિતી જીઆઇડીસીને આપેલ છે આ લેન્ડ લૂઝર્સની</li></ul>

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ક્રમ	મુદ્દો રજૂ કરનારનું નામ અને ગામ	રજૂ કરેલ મુદ્દાઓ	પરિયોજનાના પ્રતિનિધી દ્વારા આપવામાં આવેલ પ્રત્યુત્તર	રિમાર્ક્સ
		<ul style="list-style-type: none"><li>તેમણે પૂછ્યું કે આ કંપનીમાં કેટલા હાનિકારક કેમિકલનો વપરાશ થવાનો છે અને તેના માટે તેની તકેદારીની વિગત જણાવો.</li><li>તેમણે જણાવ્યું કે સીએસઆરની એક્ટીવીટીમાં ગામની અંદર પણ વૃક્ષોનું વાવેતર કરવું જોઈએ તેમજ મેડિકલ અને બ્લડ</li></ul>	<ul style="list-style-type: none"><li>આ એકમમાં ઘણા સોલ્વન્ટનો ઉપયોગ થશે અને તે માટેની તકેદારીની વિગત હાથએ રિપોર્ટના રિસ્ક અસેસમેન્ટના પ્રકરણ - ૭ માં આપવામાં આવેલ છે અને એકમ કાર્યરત થયા પછી જોખમી કેમિકલ વિશે કામદારો અને આસપાસના લોકો ને તેની જાણકારી આપવામાં આવશે.</li><li>આપના સૂચનોને આવકારીએ છે અને તેનો અમલ કરવા કટીબધ્ધ છીએ.</li></ul>	સમસ્યાની જવાબદારી જીઆઇડીસીની છે. આ માટે ઉદ્યોગકારો એ લેન્ડ લૂઝર્સની માહિતી માટે જીઆઇડીસીનો સંપર્ક કરવો.



# Gujarat Pollution Control Board

## Regional Office-Bharuch



C-1, 119/3, GIDC, Phase-2, Narmadanagar, Bharuch-392015

Website: [www.gpcb.gov.in](http://www.gpcb.gov.in)

ક્રમ	મુદ્દો રજૂ કરનારનું નામ અને ગામ	રજૂ કરેલ મુદ્દાઓ	પરિયોજનાના પ્રતિનિધી દ્વારા આપવામાં આવેલ પ્રત્યુત્તર	રિમાર્ક્સ
		કેમ્પ નું આયોજન કરવું જોઈએ. અમારી ઉપરની રજૂઆતોને સકારાત્મક રીતે ધ્યાનમાં લેવામાં આવે તો અમે પ્રોજેક્ટને આવકારીએ છીએ.		

પ્રાદેશિક અધિકારીશ્રી એ વધુમાં ફોરમને જણાવ્યું કે લોક સુનાવણી અગાઉ કુલ પાંચ લેખિત રજૂઆતો મળેલ છે. જેમાં પહેલી રજૂઆત શ્રી જીતેન્દ્રકુમાર બી. પટેલ, ભરૂચ, બીજી રજૂઆત શ્રી મહેશ પંડ્યા, પર્યાવરણ મિત્ર, અમદાવાદ, ત્રીજી રજૂઆત શ્રી ધર્મેશ મીસ્ત્રી, ભરૂચ, ચોથી રજૂઆત શ્રી પ્રવીણભાઈ શેઠ, અંકલેશ્વર અને પાંચમી રજૂઆત શ્રી વિનોદ એમ. જાદવ, ભરૂચ તરફથી મળેલ છે. આ રજૂઆતોને તેમજ પ્રોજેક્ટ પ્રપોનન્ટના પ્રત્યુત્તરનો કાર્યવાહી નોંધમાં સમાવેશ કરવામાં આવશે.

ત્યારબાદ આભારવિધિ સાથે પ્રાદેશિક અધિકારીશ્રીએ લોક સુનાવણીને પૂર્ણ જાહેર કરી.

સ્થળ: દહેજ

જીલ્લો: ભરૂચ

તારીખ: ૨૯/૦૬/૨૦૧૬

એચ. સી. સોલંકી

પ્રાદેશિક અધિકારી,

જી.પી.સી.બી., ભરૂચ

બી. જી. પ્રજાપતિ

અધિક જીલ્લા કલેક્ટર અને

અધિક જીલ્લા મેજિસ્ટ્રેટ,

ભરૂચ

# Gujarat Pollution Control Board

## Regional Office-Bharuch



C-1, 119/3, GIDC, Phase-2, Narmadanagar, Bharuch-392015

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### Annexure – C

A statement showing response and comments received in written format from others concerned persons in the Environment aspects for M/s. Lewens Labs Pvt. Ltd. for manufacturing of Synthetic APIs – 24.45 MT/Month and Bulk Drug Intermediates – 8.15 MT/Month before Public Hearing held on 29/06/2016 at 10:00 at Project Site D2/CH/376 & 377, GIDC – Dahej, Ta. Vagra, Dist: Bharuch as per the Ministry of Environment and Forests, Government of India, New Delhi vide its Notification No. S.O. 1533 dated 14/09/2006 and its amendment S.O. 3067 (E) dated 01/12/2009.

Sr. No.	Comments Received in writing from Concerned Persons	Annexure
1	ShriJitendrabhaiBabalbhai Patel, Bharuch Dated 24/06/2016	C-1
2	ShriMaheshbhaiPandya, ParyavaranMitra, Thaltej, Ahmedabad, Dated 16/06/2016	C-2
3	ShriDharmeshbhaiMistry, Bharuch Dated 27/06/2016	C-3
4	Shri P PSheth, Ankleshwar, Dated 28/06/2016	C-4
5	ShriVinod M Jadav, Bahruch, Dated 29/06/2016	C-5

Annexure e-1

पटेल जितेन्द्रकुमार बबलभाई  
अ-४, गजाननपार्क सोसायटी,  
आर.बी.एल स्कूलके पीछे,  
जी.आइ.डी.सी., अंकलेश्वर  
जिला-भरूच-३९३००२  
दिनांक: २४/०६/२०१६

मेम्बर सेक्रेटरी,  
गुजरात प्रदुषण नियंत्रण बोर्ड,  
गांधीनगर

महोदयश्री,

दिनांक २९ जूनको भरूच जिलेके वागरा तहसिलके दहेज जीआइडीसीमें लेविन्स लेब्स प्राइवेट लिमिटेडकी पर्यावरण सावजनिक सुनवाई होनेवाली है। जिसमें हमारे निम्नलिखित प्रश्न और सुझाव है।

- १) आपकी कंपनीके डायरेक्टरोकी दुसरे कौनसी जगह प्लान्ट है, उसको पर्यावरणके नियमोके तहत कभी क्लोजर या शोकोज नोटीस मिला है? अगर मिला है तो कोपी शामिल किजिए, ओर उसके बाद आपने क्या कदम उठाए।
- २) आप शुध्द पानीका उपयोग कम करनेके लिए बारिशका पानीका स्टोरेजके लिए टेन्क बनानेवाले है, उसकी क्षमता कितनी रहेगी? वह टेन्कसे आप एक सालमें कितना पानीकी बचत कर सकोगे?
- ३) आप अपने प्लान्टसे निकलनेवाला हेजार्डस सोलीड वेस्ट किसको देनेवाले है? उसके बारेमें कोई MOU किया है? अगर किया है तो कोपी शामिल किजिए।
- ४) आपके प्लान्टसे स्क्रबरसे SO<sub>2</sub>, HCL और NH<sub>3</sub> स्क्रब करनेवाले है। वह सोल्यूशनका आप क्या करनेवाले है। यह सोल्यूशनके लिए आपने किसी पार्टीका संपर्क किया है? उसके साथ MOU किया है? अगर किया है तो कोपी शामिल किजिए।
- ५) रेनवोटर हार्वेस्टिंगके लिए आप आसपासके गांवके तालाबोकी स्टोरेज क्षमता बढे और स्वच्छता बढे वैसा प्रयास करे वैसी अपेक्ष है।
- ६) बारिशका कन्टामिनेशनवाला पानी प्लान्टके बहार न जाय इसके लिए आप क्या कदम उठानेवाले है।
- ७) आपने इलेक्ट्रोनिक वेस्टके लिए किसी एजन्सीका संपर्क किया है?
- १०। आपने आसपासके गांवमें पंचायतके कार्यालयके सिवा कैसे प्रचार किया उसकी सीडी सामेल करना। लाउडस्पीकरसे प्रचार किया होतो उसकी सीडी सामेल करना।

यह खतका प्रत्युत्तर हिन्दीमें दिया जाय एसी अपेक्षा है।

जितेन्द्रकुमार बबलभाई पटेल  
अंकलेश्वर  
मो: 9998980519

Answer C-2

**From:** paryavaran mitra <[paryavaranmitra@yahoo.com](mailto:paryavaranmitra@yahoo.com)>  
**Date:** 24 June 2016 at 11:33:09 AM IST  
**To:** Gpcbpublichearing <[gpcbpublichearing@gmail.com](mailto:gpcbpublichearing@gmail.com)>  
**Cc:** Collector Bharuch <[collector-bha@gujarat.gov.in](mailto:collector-bha@gujarat.gov.in)>, GPCB Bharuch <[gpcb-bha@gujarat.gov.in](mailto:gpcb-bha@gujarat.gov.in)>  
**Subject:** EPH of M/s. Lewens Labs Pvt. Ltd., GIDC Dahej, Bharuch to be scheduled on June 29th, 2016.  
**Reply-To:** paryavaran mitra <[paryavaranmitra@yahoo.com](mailto:paryavaranmitra@yahoo.com)>

**Ref:** PM/MP/2696/2016

**Date:** 16/06/2016

To,  
Member Secretary  
Gujarat Pollution Control Board  
Gandhinagar

**Sub. : Environmental public hearing of M/s. Lewens Labs Pvt. Ltd., GIDC Dahej, Bharuch to be scheduled on June 29<sup>th</sup>, 2016.**

Sir,

We have studied the draft EIA report of the above-mentioned project. Following are our observation/comments/questions regarding project and draft EIA report.

1. How the required land for the project is acquired? Was it a government or private land?
2. What was the previous land use of the land for proposed project? Has Industry obtained NA Permission for the land? Please provide the document.
3. How the required land for the project is acquired? Was it a government or private land?
4. When was environmental clearance for this project in Form I applied?
5. What is the status of NOC application to GPCB for this project?
6. What types of precautions will be taken for storage and transportation of hazardous material and waste?
7. Why baseline monitoring started even before approval of TOR? Please give exact dates of monitoring of each samples of ambient air and noise monitoring.
8. Please justify domestic water requirement for proposed project.
9. Please give details of each ETP units.
10. Please give name of CPCB/SPCB approved oil refiner to whom used oil will be sold.
11. Please give name of Co-processor to whom used charcoal will be sent
12. Please give name of SPCB approved dealer to whom discarded drums, carboys and plastic bags will be sent.
13. Please provide agreement / MOU with cement industries to whom distillate residue and Expired drugs/medicines and off specification material will be sent.

14. Why only 3000 sq.mof total land area will be developed for greenbelt rather than guideline of at least 33%?
15. What types of socio-economic development activities industry will take up as a part of CSR activity and what is the budget for CSR activity?
16. How many local people will get employment through this proposed project?

Yours truly,

Mahesh Pandya

CC: 1. Collector, Bharuch

2.Regional officer, GPCB Bharuch

**Paryavaran Mitra**

502, Raj Avenue, Bhaikakanagar road

Thaltej, Ahmedabad - 380059

Telefax - 079-26851321

email - [paryavaranmitra@yahoo.com](mailto:paryavaranmitra@yahoo.com)

website - [www.paryavaranmitra.org.in](http://www.paryavaranmitra.org.in)

## Annexure e-3

ધર્મેશ મિસ્ત્રી

બ્લોક નં. ૧૪, ઘર નં. ૧૩૪૦, નર્મદા એપાર્ટમેન્ટ,

મામલતદાર કચેરી મામે, ભરૂચ.

મો : ૯૦૩૩૫૩૧૧૧૫

તા. ૨૭-૦૬-૨૦૧૬

પ્રતિ શ્રી,

૧. પર્યાવરણીય લોકસુનાવણીના અધ્યક્ષશ્રી (ડિસ્ટ્રીક્ટ મેજિસ્ટ્રેટ સાહેબશ્રી)

કલેક્ટર કચેરી, ભરૂચ.

૨. મેમ્બર સેક્રેટરી

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, સેક્ટર-૧૦ એ, ગાંધીનગર.

૩. રીજીયોનલ ઓફિસર, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, ભરૂચ.

**વિષય : લેવીન્સ લેબ પ્રા. લી. પર્યાવરણીય લોકસુનાવણીના વાંધા સુચનો.**

૧. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એમુલ કરેલા ફંક્શનલ એરિયા એક્સપર્ટના નામો તથા તેઓએ કયા કયા એરિયા માટે કામ કરેલ છે તેની વિગત, તેની સમયમર્યાદા તથા તેમના પોતાના સહી સિક્કા સાથે કોપી એમ.ઓ.એમ. મા લેવા વિનંતી.
૨. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એમુલ કરેલા ફંક્શનલ એરિયા એક્સપર્ટ કાયમી પગારદાર અધિકારી છે કે નહિ તેની વિગત.
૩. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એમુલ કરેલા ફંક્શનલ એરિયા એક્સપર્ટ જો બહારથી લીધા હોય તો તેઓ અને કન્સલ્ટન્ટ વચ્ચે થયેલા કરારની નકલ એમ.ઓ.એમ. માં લેવા વિનંતી.
૪. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એમુલ કરેલા ફંક્શનલ એરિયા એક્સપર્ટ જો બહારથી લીધા હોય તો તેઓએ પર્યાવરણીય લોકસુનાવણીના ઈ.આઈ.એ. રીપોર્ટ માટે કઈ કઈ કંપની માટે સહીઓ આપી છે અને કામ કર્યા છે તેની વિગત.
૫. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એમુલ કરેલા ફંક્શનલ એરિયા એક્સપર્ટ જો બહારથી લીધા હોય તો તેઓને કેટલી ફી ચુકવવામાં આવેલ છે તે જણાવશો.
૬. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એમુલ કરેલા ફંક્શનલ એરિયા એક્સપર્ટ કાયમી પગારદાર અધિકારી હોય તો છેલ્લા ૧૮ માસમાં ચુકવવામાં આવેલ પગાર અંગેની પગાર સ્લીપ એમ.ઓ.એમ. મા લેવા વિનંતી.
૭. કન્સલ્ટન્ટની પર્યાવરણીય લોક સુનાવણી અને આ પ્રોજેક્ટ બાબતે શું જવાબદારી નક્કી કરવામાં આવેલ છે તેની વિગત.

(૨)

૮. કંપનીએ કન્સલ્ટન્ટને આ પ્રોજેક્ટ માટે કેટલી ફી ચુકવેલ છે તેની વિગત.
૯. કંપનીના કન્સલ્ટન્ટે ઈ.આઈ.એ. રીપોર્ટની અંદર જે ડોક્યુમેન્ટ એક્રેડિટેશન સર્ટિફિકેટ તરીકે આપવામાં આવેલ છે. તે આજની તારીખમાં વેલીડ હોય તો તેની ખરાઈ કરીને હાર્ડ કોપી પર જવાબદાર અધિકારી દ્વારા સહી સિક્કા કરી એમ.ઓ.એમ.માં લેવા વિનંતી.
૧૦. કંપનીના કન્સલ્ટન્ટે ઈ.આઈ.એ. રીપોર્ટની અંદર જે ડોક્યુમેન્ટ એક્રેડિટેશન સર્ટિફિકેટ તરીકે આપવામાં આવેલ છે. તે આજની તારીખમાં વેલીડ ના હોય તો તેની પર જી.પી.સી.બી. તરફથી કાયદાકીય પગલા લેવામાં આવશે તેવી બાંહેધરી આપતા યત્ર એમ.ઓ.એમ. માં લેવા વિનંતી.
૧૧. ઈ.આઈ.એ. રીપોર્ટના ગુજરાતી સારાંશમાં કન્સલ્ટન્ટનું નામ દરેક પેજ પર કેમ લખેલ નથી તે જણાવશો.
૧૨. ઈ.આઈ.એ. રીપોર્ટના ગુજરાતી સારાંશમાં કન્સલ્ટન્ટનું નામ દરેક પેજ પર લખેલ ન હોય અને જો ભવિષ્યમાં કાયદાકીય પ્રશ્ન ઉભો થાય તો જવાબદારી કોની રહેશે તેનું નામ અને સરનામું જણાવશો.
૧૩. TOR ના મુદ્દા નંબર ૪૯ માં NABET QCI નું એક્રેડિટેશન સર્ટિફિકેટ માંગેલ છે તો Provisionally Certificated by NABET / QCI, Vide Letter No. NABET / EIA / 327 / IA14 Dated 12/05/2014 નું સર્ટિફિકેટ કેમ મૂકવામાં આવ્યું છે તે જણાવશો.
૧૪. લેન્ડલુઝરના નામ, સરનામા જણાવશો.
૧૫. NABET - QCI નું વેલીડિટી ધરાવતું એક્રેડિટેશન સર્ટિફિકેટ એમ.ઓ.એમ. મા લેશો.
૧૬. NABET - QCI નું વેલીડિટી ધરાવતું એક્રેડિટેશન સર્ટિફિકેટ ઈ.આઈ.એ. રીપોર્ટમાં કન્સલ્ટન્ટે રજૂ કરેલ નથી તેનું કારણ જણાવશો.
૧૭. NABET - QCI નું વેલીડિટી ધરાવતું એક્રેડિટેશન સર્ટિફિકેટ કન્સલ્ટન્ટ ધરાવે છે કે નહીં તે જણાવશો.
૧૮. ઈ.આઈ.એ. રીપોર્ટનું પ્રેઝન્ટેશન કરનાર વ્યક્તિનું નામ, હોદ્દો તથા સંસ્થાનું નામ, સરનામું જણાવવું તથા તેનું ઓળખપત્રની ઝેરોક્ષ નકલ એમ.ઓ.એમ.માં લેશો.
૧૯. અમોએ એટલે કે ધર્મેશ મિસ્ત્રીએ પાશ્વનાથ પીગમેન્ટ લી. - જંબુસરની તા. ૧૬-૧૨-૨૦૧૫ની પર્યાવરણીય લોકસુનાવણીમાં રજૂ કરેલ વાંધા સૂચનોના મુદ્દા નંબર ૪, ૫, ૬ અને ૮ ના જવાબો સંતોષકારક મળેલ નથી. જેમાં કન્સલ્ટન્ટ તરીકે સન એન્વાયરોટેક પ્રા.લી. હતા.
૨૦. અમોએ એટલે કે ધર્મેશ મિસ્ત્રીએ પાશ્વનાથ પીગમેન્ટ લી. - જંબુસરની તા. ૧૬-૧૨-૨૦૧૫ની પર્યાવરણીય લોકસુનાવણીમાં રજૂ કરેલ વાંધા સૂચનોના મુદ્દા નંબર ૪, ૫, ૬ અને ૮ ના જવાબો સંતોષકારક મળેલ નથી. જેમાં કન્સલ્ટન્ટ તરીકે સન એન્વાયરોટેક પ્રા.લી. હતા. તેના જવાબો સંતોષકારક મળી રહે તેવું ઘટતું કરશો.

બિડાણ : પાશ્વનાથ પીગમેન્ટના વાંધા સૂચનો તથા કંપનીના જવાબો. કુલ પેજ ૭

ધર્મેશ મિસ્ત્રી



સહી

ધર્મશ મિસ્ત્રી

બ્લોક નં. ૧૪, ધર નં. ૧૩૪૦, નર્મદા એપાર્ટમેન્ટ,  
મામલતદાર કચેરી સામે, ભરૂચ.

મો: ૯૦૩૩૫૩૧૧૧૫

તા. ૦૪-૧૨-૨૦૧૫

પ્રતિ શ્રી,

૧. પર્યાવરણીય લોકસુનાવણીના અધ્યક્ષી (ડિસ્ટ્રિક્ટ મેજિસ્ટ્રેટ સાહેબશ્રી)  
કલેક્ટર કચેરી, ભરૂચ.

૨. મેમ્બર સેક્રેટરી  
ગુજરાત પ્રદુષણ નિયંત્રણ બોર્ડ, સેક્ટર-૧૮ એ, આંબીનગર.

૩. રીજીયોનલ ઓફિસર, ગુજરાત પ્રદુષણ નિયંત્રણ બોર્ડ, ભરૂચ.

G. P. C. Board

BHARUCH

Inward No. 39/15

Date: 14/12/15

વિષય : પામનાથ મીથામેન્ટરા હી. ની પર્યાવરણીય લોકસુનાવણીના વાંધા સુચનો.

૧. કંપનીમાં કોઈ દારણસર આગ લાગે તો તેના માટે કયા પ્રકારની વ્યવસ્થા કરવામાં આવનાર છે.
૨. કંપનીમાં ફાયર ટેન્કર પોતાની માલિકીનું સમવાયમાં આવનાર છે કે નહીં.
૩. લેન્ડલુઝર્સના નામો એમ.ઓ.એમ. મા લેવા વિનંતી.
- ✓ ૪. NABET-QCI નું વેલીડેટી કરાવતું એકોડિટિયન સર્ટિફિકેટ એમ.ઓ.એમ. મા લેવા વિનંતી.
- ✗ ૫. NABET-QCI નું વેલીડેટી કરાવતું એકોડિટિયન સર્ટિફિકેટ ઈ.આઈ.એ. રીપોર્ટમાં કન્સલ્ટન્ટે રજૂ કરેલ નથી તેનું કારણ જણાવશો.
- ✓ ૬. NABET-QCI નું એકોડિટિયન સર્ટિફિકેટ કન્સલ્ટન્ટ દ્વારા છે કે નહીં તે જણાવશો.
૭. NABET-QCI નું વેલીડેટી કરાવતું એકોડિટિયન સર્ટિફિકેટ કન્સલ્ટન્ટ દ્વારા તા.૧૬-૧૨-૨૦૧૫ સુધીમાં સંબંધિત કચેરીને રજૂ કરવામાં ન આવે તો પર્યાવરણીય લોકસુનાવણી શરૂ કરવામાં આવે તેવી અપારી અરજ છે.
- ✓ ૮. ઈ.આઈ.એ. રીપોર્ટનું પ્રેક્ટીસીંગ કરનાર વ્યક્તિનું નામ, ફોટો તથા સંસ્થાનું નામ સરનામું જણાવતું તેમજ ઈ.આઈ.એ. રીપોર્ટનું પ્રેક્ટીસીંગ કરનાર વ્યક્તિનું નામ, ફોટો તથા સંસ્થાનું નામ આપવાનું એમ.ઓ.એમ. મા લેવા વિનંતી.
૯. જે જમીન ઉપર કંપનીનો પ્રોજેક્ટ આવી રહેલ છે તે જમીન કંપનીની માલિકીની છે તેના સર્વે નંબર સંબંધિતના પુરાવા એમ.ઓ.એમ. મા લેવા વિનંતી. જોવા કે આમ નમુના નંબર - ૭ ની નકલ (વિતરણ સમયે જમીન કંપનીની માલિકીની છે તેનો તારીખ સંબંધિત પુરાવો).
૧૦. જે જમીન ઉપર કંપનીને પ્રોજેક્ટ આવનાર છે તે તમામ સર્વે નંબરવાળી જમીન ઓર્થોગોનલ હેતુ માટે વિનખેતી કરવામાં આવેલ છે કે નહીં તે જણાવશો.
૧૧. જે જમીન ઉપર કંપનીનો પ્રોજેક્ટ આવનાર છે તે તમામ સર્વે નંબરવાળી જમીન ઓર્થોગોનલ હેતુ માટે વિનખેતી થયેલ હોય તો તેના પુરાવા એમ.ઓ.એમ. મા લેવા વિનંતી.

ME-1  
Send to  
Mujib  
10/12/15

ધર્મશ મિસ્ત્રી

સહી



**Translation in English**

Dharmesh Mistry,  
Block No. 14, House no. 1340, Narmada Apartment,  
Opp. Mamaltdar Office, Bharuch  
M: 9033531115

Date: 04/12/2015

To,

1. Chairman of Public Hearing (District Magistrate),  
Collector Office, Bharuch
2. Member Secretary,  
Gujarat Pollution Control Board,  
Sector-10A, Gandhinagar
3. Regional Officer  
Gujarat Pollution Control Board, Bharuch

**Sub:** Our objections/suggestions for Environment Public Hearing of Parshwnath Pigments Ltd.

1. What kind of arrangement will be planned to prevent fire in unit, if any?
2. Whether company will provide fire tender of their own or not?
3. Pls. provide the name of land-losers name and request to incorporate in MOM.
- ✓ 4. Request to incorporate valid accreditation certificate of NABET-QCI in MOM.
- ✓ 5. Why consultant has not represented their valid accreditation certificate of NABET-QCI in EIA report?
- ✓ 6. Consultant is having accreditation certificate of NABET-QCI or not?
7. We request to cancel the Environment Public Hearing if they are unable to submit valid accreditation certificate of NABET-QCI to concern office till 16.12.2015.
- ✓ 8. Pls. provide name, designation and address of organization who present EIA report and its accreditation and incorporate it in MOM.
9. Provide proof of land ownership where project is going to set up and its proof like copy of form no. 7 and incorporate it in MOM. (Provide the proof of land ownership of company with effective date.

10. Pls. inform that, whether land of all survey number of the project is converted from agriculture to non-agriculture land for industry purpose.
11. If land of all survey number of the project is converted from agriculture to non-agriculture land for industry purpose, then provide proof and Incorporate it In MOM.

Dharmesh Mistry

-Sd-

Signature

PPL

PARSHWNATH PIGMENTS LTD.

પ્રતિક્રી,

ધર્મેશ મિસ્ત્રી,

બ્લોક નં ૧૪, ઘર નં ૧૩૪૦, નર્મદા ચેપાર્ટમેન્ટ,

મામલતદાર કચેરીની સામે,

ભરૂચ

૧૬.૧૨.૨૦૧૫

વિષય:પાર્શ્વનાથ પિગમેન્ટ્સ લિમિટેડની તા. ૧૬.૧૨.૨૦૧૫ ની પર્યાવરણીય લોક સુનાવણીબાબતે

મહેરબાન સાહેબ શ્રી,

આપના તરફથી પર્યાવરણીય લોકસુનાવણીના અધ્યક્ષ શ્રી (ડિસ્ટ્રીક્ટ મેજિસ્ટ્રેટ), કલેક્ટર કચેરી,ભરૂચ, મેમ્બર સેક્રેટરી, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, સેક્ટર-૧૦ એ, ગાંધીનગર અને રીજીયોનલ ઓફિસર, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, અંકલેશ્વરને ઉદ્દેશીને લખેલ પત્ર મળ્યો. આ પત્રનો મુદાવાર જવાબ નીચે મુજબ છે:

૧. કંપની માં જો કોઈ કારણોસર આગ લાગશે તો તેના નિયંત્રણ માટે અલગ અલગ પ્રકારના અગ્નિશામકો (ફાયર એક્સ્ટિંગ્વિશર) રાખવામાં આવશે અને આકસ્મિક સંજોગોમાં તેનો ઉપયોગ તુરંત થઈ શકે તે માટે નક્કી કરેલ કર્મચારીઓને તલિમ આપવામાં આવશે.
૨. એકમ પોતાની માલિકીનું ફાયર ટેન્કર રાખવાનું વિચારતી નથી.
૩. અમારા એકમ દ્વારા કોઈ પણ જમીન સંપાદિત કરેલ નથી અને જરૂરી જમીન ખેડૂતો પાસેથી બજાર કિંમતે ખરીદેલ છે.
૪. કન્સલ્ટન્ટનું NABET - QCA ચેકીડીટેશન સર્ટીફિકેટ ઇઆઇએ રીપોર્ટ સાથે સામેલ કરેલ છે. એમ.ઓ.એમ ના અબાધિત હક લોક સુનાવણીના સભ્ય સચિવ અને ચેરમેનશ્રી નો હોઇ આ બાબત નો નિર્ણય તે લોકો લેશે.
૫. અમારા કન્સલ્ટન્ટે ઇઆઇએ રીપોર્ટ સાથે સામેલ કરેલ પરિશિષ્ટ-૧૦ NABET - QCA દ્વારા ઇસ્યુ કરવામાં આવેલ ચેકીડીટેશન સર્ટીફિકેટ જ છે.
૬. ઇઆઇએ રીપોર્ટ સાથે સામેલ કરેલ પરિશિષ્ટ-૧૦ NABET - QCA દ્વારા ઇસ્યુ કરવામાં આવેલ ચેકીડીટેશન સર્ટીફિકેટ જ છે.

# PPL

PARSHWNATH PIGMENTS LTD.

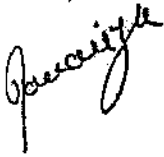
૭. અમારા કન્સલ્ટન્ટે ઇઆઇએ રીપોર્ટ સાથે સામેલ કરેલ પરિશિષ્ટ-૧૦ NABET - QCI દ્વારા ઇસ્યુ કરવામાં આવેલ એકીડીટેશન સર્ટીફિકેટ જ છે. જેમાં અમારા કન્સલ્ટન્ટ - સન એન્વાઇરોટેક પ્રા. લિ., અમદાવાદ ને જ સંબોધીને QCI/NABET દ્વારા સર્ટીફિકેટ ઇસ્યુ કરવામાં આવેલ છે. જેની માન્યતાની સમય મર્યાદા ૨૧ ડીસેમ્બર, ૨૦૧૬ સુધીની છે જેનો ઉલ્લેખ આ સર્ટીફિકેટમાં કરેલ છે.
૮. લોક સુનાવણીનું પ્રેઝન્ટેશન કરનાર કન્સલ્ટન્ટના પ્રતિનિધિનું નામ સામાન્યતઃ એમ.ઓ.એમ માં હોય જ છે. તેમ છતાં એમ.ઓ.એમ ના અબ્યાધિત હક લોક સુનાવણીના સભ્ય સચિવ અને ચેરમેનશ્રી નો હોઇ આ બાબત નો નિર્ણય તે લોકો લેશે.
૯. જે જમીન પર પ્રોજેક્ટ આવી રહ્યો છે તેમાંની અમુક જમીન રેવન્યુ રેકોર્ડમાં એકમના ડાયરેક્ટરના નામે છે અને બાકીની જમીન રેવન્યુ રેકોર્ડમાં ખેડૂતના નામે છે. જે જમીન રેવન્યુ રેકોર્ડમાં ખેડૂત ના નામે છે તે જમીન માટે એકમ દ્વારા/એકમના ડાયરેક્ટર દ્વારા વેચાણ કરાર કરેલ છે અને તેના ગામ નમૂના - ૭ ની નકલ પરિશિષ્ટ - ૨ તરીકે ઇઆઇએ રીપોર્ટમાં સામેલ કરેલ છે.
૧૦. ના, આ જમીન બીનખેતી થયેલ નથી પરંતુ તેની કાર્યવાહિ ચાલુ છે અને જ્યાં સુધી બીનખેતી થશે નહિ ત્યાં સુધી એકમના પ્રસ્થાપન માટે કોઇ કાર્યવાહિ કરવામાં આવશે નહિ.
૧૧. મુદ્દા નંબર ૧૧ નો ખુલાસો મુદ્દા નંબર ૧૦ માં શામેલ છે.

આભાર સહ,

આપનો વિશ્વાસુ,

પાર્શ્વનાથ પિગમેન્ટ્સ લિમિટેડ

ડાયરેક્ટર



B/401, Premium House, Opp. Gandhigram Rly Station, Navrangpura, Ahmedabad - 380 009.  
Phone : 0091-79-26580151, 26580170 Fax : 26581629 [parshwnath@parshwnath.com](mailto:parshwnath@parshwnath.com)

# PPL

PARSHWNATH PIGMENTS LTD.

## Translation of Reply in English

To,

16/12/2015

Dharmesh Mistry

Block No. 14, House No. 1340, Narmada Apartment,

Opp. Mamlatdar Office,

Bharuch

m: 9033531115

Respected Sir,

We are in receipt of your letter addressed to Chairman of Public Hearing (District Magistrate), Collector Office, Bharuch, Member Secretary, Gujarat Pollution Control Board, Sector-10A, Gandhinagar, Regional officer, Gujarat Pollution Control Board, Bharuch. We have checked the points of your letter and would like to give our reply/clarifications as under:-

- A.1 Because of any reason fire will take place in company, different type of fire extinguisher will be placed there for their control and to guide specific employees to use immediately in case of accident.
- A.2 Unit do not think to take own fire tender.
- A.3 No land is acquired by our unit and necessary land is bought from farmers at market rate.
- ✓ A.4 NABET-QCI accreditation certificate of consultant include with EIA Report. The chairman of Public Hearing have the right of MOM, so they will take decision.
- ✓ A.5 Consultant has included accreditation certificate in EIA report as Annexure-10.
- ✓ A.6 Consultant has included accreditation certificate in EIA report as Annexure-10.
- A.7 Consultant has included accreditation certificate in EIA report as Annexure-10. The certificate is in favour of our consultant San Envirotech Pvt. Ltd.,

---

B/401, Premium House, Opp. Gandhigram Rly Station, Navrangpura, Ahmedabad - 380 009.  
Phone: 0091-79-26580151, 26580170 Fax: 26581629 [parshwnath@parshwnath.com](mailto:parshwnath@parshwnath.com)

# PPL

PARSHWNATH PIGMENTS LTD.

Ahmedabad, it's validity is up to 21<sup>st</sup> December 2016, which is already mention in certificate.

A.8 Name of representative of consultant who gives presentation of public hearing is generally in MOM. Although, The chairman of Public Hearing have the right of MOM, so they will take decision.

A.9 Project falls in land which have some part of land is of director of unit in revenue record. And other part of land is of farmer in revenue record. Land which is of farmer in revenue record, for that land agreement is done by director of unit and copy of revenue record-7 is included as annexure-2 in EIA Report.

A.10 No, this land is not converted into non-agricultural but it is under process and until land will not become non-agricultural, any procedure for set-up of unit will not be done.

A.11 Clarification of point no. 11 is included in point no.10.

Thanking You,

For, Parshwnath Pigments Ltd.

Director



---

B/401, Premium House, Opp. Gandhigram Rly Station, Navrangpura, Ahmedabad - 380 009.  
Phone : 0091-79-26580151, 26580170 Fax : 26581629 [parshwnath@parshwnath.com](mailto:parshwnath@parshwnath.com)

Annexure C-4

**Save environment – care for next generation**  
**Environment public hearing of Lewens Labs Pvt. Ltd.**  
**Gujarat, Date: 29 June 2016, time 10 hrs.**

Page 01 of 05

**MOST URGENT**      date- 28 JUNE 2016

<b>From :</b> Pravinbhal p sheth, A/ 8 kalindi apt, Chikuwadi, Ankleshwar-393001, Gujarat, Mob +919377958840 Mail id – <a href="mailto:gcfastservice2@gmail.com">gcfastservice2@gmail.com</a> ,
<b>To,MS-GPCB, Gandhinagar,</b> Gujarat, <a href="mailto:ms-gpcb@gujarat.gov.in">ms-gpcb@gujarat.gov.in</a> , Alternate <a href="mailto:gpcbpublichearing@gmail.com">gpcbpublichearing@gmail.com</a> ,
<b>cc RO-BHARUCH-GPCB</b> <a href="mailto:bharuchgpcb@yahoo.com">bharuchgpcb@yahoo.com</a> ,
<b>Sub: Environment public hearing of m/s Lewens Labs Pvt.</b> Ltd. Dahej, dist, Bharuch, Gujarat, Date: 29 June 2016, time 10 hrs.

**Respected shri Hardik shah saheb,**

We are forwarding herewith positive response to environment public hearing under reference to seek some more information on project activities and it's mitigation measures to overcome some of the likely total negative adverse impact. Hope, our positive inputs may of some use to proponent /consultant, to improve draft REIA in a better and in an effective way for presentation at SEAC meeting.

*(I will try to remain present myself at schedule date, in case if I cannot report, please read my comments and minute the same with response from Project Proponent)*

Now, there is a need to harmonize industrial growth with the environmental concerns and developments options under consideration *should be sustainable*, daft REIA studies can often prevent future liabilities or expensive alterations in project design, if presented in an effective way.

Please register my views and include in minutes with the project proponent's acceptable reply.

**Save environment – care for next generation**  
**Environment public hearing of Lewens Labs Pvt. Ltd.**  
**Gujarat, Date: 29 June 2016, time 10 hrs.**

Page 02 of 05

We are forwarding our positive review findings as under,

**Section A Appreciations**

01	Promoters are well qualified and well experienced.
02	Promoter investing > INR 10 crores, a step forward towards, asocio economic growth of Bharuch dist, and will be a contributor to revenue income to govt. treasury.
03	Agro briquettes will be used as a fuel, so encouraging environment friendly concept, and promoting tangibly employment to labors who are engaged in preparing agro briquettes
04	All mfg. processes are well defined
05	Employment opportunities will be created for > 30 workers during construction period and > 60 persons on post commissioning.
06	Details on antidotes provided.-appreciated
07	More than Rs 50 lakhs, budgeted for CSR activities.

**Section B likely attracted queries**

08	Pl. refer sec 1.4.1, You have quoted, as project site is in ' <u>notified industrial estate</u> ', we request you to reconfirm it again, as, if it so, to, our, knowledge, environment public hearing is not required, for such industries.
09	Pl. refer sec 2.7 You have listed , in all you will mfr 17 ( a to q) synthetic API products and in all 14 (a to n) Bulk drugs intermediates, products, BUT ref, sec 2.10, page 2.6 to 2.53, you have referred only 17 , synthetic API mfg. process, flow diagrams and mass balance, we do appreciate it, how about further details on mfg. process, flow diagrams and mass balance for balance 14 Bulk drugs intermediates. Pl. look in to matter and provide the same in MoM and in final report.
10	Ref sec 2.15.2, page 2.59, You are proposing GREEN BELT area as 30 @ of the total plot area, pl. provide information on what % norms GPCB/CPCB has given. ( generally GPCB/CPCB informs minimum 33% green belt of total plot area.



## Save environment – care for next generation

Environment public hearing of Lewens Labs Pvt. Ltd.

Gujarat, Date: 29 June 2016, time 10 hrs.

		Page 03 of 05
11	<p>We presume, at the time of allotting a plot, GIDC also must have given to you separate norms of tree plantation, within a stipulated time bound programme, hope, that norms also must have been followed, as applicable. ( GIDC norms are to plant minimum one tree per 100 m2 total allotted plot area, unless deviated as case to case.)</p>	
12	<p>Ref table 2.8, page 2.71, You have enlisted so many raw materials, ( sr. no. not given-difficult to count ), few MAY be of Poisonous, health hazardous, toxics, nature, hope, you must have carried out it's <u>compatibility studies</u>, to work out a better methodology for a bulk storage warehouse / material store, if, so, pl. provide the copy of same.</p>	
13	<p>Table 2.9, page 2.74, a-You MAY be procuring no. of solvents in tanker load, Pl. provide solvent tanker unloading procedure. b-you have projected max storage qty of solvents as 30 MT, it alarms major LIKELY fire risk at project site, what will be your measures for a quick extinguishing of solvent fire, especially for low boiling point one. Pl provide plan lay out for fire prone area.</p>	
14	<p>Pl. refer table 2.11, page 2.77, You will be using 4 kld water to cover up 3000 m2 area, it work out o be very less, i.e hardly 1.3 lit m2, Looking to average temp.RH, water holding capacity, and water table at project site, is this qty adequate to achieve desired survival rate of tree plantation, Perhaps, you may have to rework out water requirement for Green belt area,</p>	
15	<p>Ref table 2.18 page , 2.90, a-Pl. explain how cement industries will carry out co-processing of distillate waste &amp; <u>expiry drugs medicines?</u> b-We appreciate that, you will carry out decontamination in house and then only resale to authorized recyclers, Pl. provide decontamination procedure for used drums, carboys and plastic bags</p>	
16	<p>Ref sec 3.1, page 3.1, How Base line studies started, quite earlier, i.e. in March 15 to May 15, prior to ToR issue date of 6 Aug 15 / amended 26 Feb 16 , We presume, there may be a good reasoning for that, pl, inform, was there any prior permission granted from SLEAC to start base line studies quite early OR what was reasoning for that.</p>	

## Save environment – care for next generation

Environment public hearing of Lewens Labs Pvt. Ltd.

Gujarat, Date: 29 June 2016, time 10 hrs.

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- |    |   |
|----|---|
| 17 | <p>Ref table 3.8, page 3.20, AAQS,<br/>Why 'CO' not monitored, though it covers in your DMP on page 6.1 , table 6.1, sr no. 4</p>   |
| 18 | <p>Ref table 3.13, page 3.25,<br/>Can you provide any explanation, How benzene is detected at project site ?</p>  |
| 19 | <p>Ref. fig 3.7, page 3.45<br/>Details provided in wind rose diagram is incomplete,<br/>Pl provide some more information, as like<br/>a-Start date and start hr<br/>b-end date and end hr<br/>c-total hrs<br/>d-total calm hrs ( how calm hrs 18.66 % was arrived without counting total hrs?<br/>e-wind velocity?<br/>On which soft ware, and who authorized agency has carried out this study.<br/><br/>This is equally applicable to other wind rose diagrams also as submitted in this EIA reports,</p> |
| 20 | <p>Ref sec 10.5.11, page 10.20<br/>You propose to plant in all 750 trees in five years span,, it seems to be too less, in the sense,<br/>Your total plot area, is 10,000 m<sup>2</sup>=2.47 acre= 2470 trees to be planted-( 1000 trees per acreage of total plot area- unless different norms given by CPCB-GPCB) and these trees has to be planted either at project site or out side public places.<br/>Pl. look in to this for a corrective action.</p>   |
| 21 | <p>Pl. provide information on<br/>a-In which MoEF / NABL approved lab. Various base line studies samples were analysed,?<br/>b-how far is this lab. From project site?<br/>c- pl. provide copy of referred lab's approval /accredited certificate-as applicable, with a special reference to scope of analyzing pm 2.5.</p>   |
| 22 | <p>Since, you must be charging solvent to reaction vessel, quite often, will you have NITROGEN PURGING SYSTEM ?</p>   |
| 23 | <p>Since you will be using Fumaeric acid in API 3 mfr, , there is likely to generate spent Fumaeric acid as a bye product, what we suggest, if acceptable, pl. do not sale it to pharma formulation industries, who mfr ferrous Fumaerate, from spent Fumaeric acid, how best price they offer, final decision will be yours.- hope, you will appreciate.</p>   |

**Save environment – care for next generation**  
**Environment public hearing of Lewens Labs Pvt. Ltd.**  
**Gujarat, Date: 29 June 2016, time 10 hrs.**

LAST PAGE

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**Section C**

**Suggestions to be implemented if found acceptable and economical**

24	Pl celebrate world environment day each year to create an awareness on environment protection.
25	Pl invite participants who extended valuable inputs to this public hearings when you commissioned the project to witness your success. (in a good faith)
26	Pl extend full medical assistance to employee's family members also for treatment of <u>infectious diseases</u> so that it can not spread further.
27	Under CSR, pl budget some funds to uplift society weaker class persons like senior citizens, widows, blind persons, orphans, handicapped one etc. of Bharuch dist.
28	In case if you use CFL lamps to conserve energy, pl. take due care at the time of discarding it to take care of mercury pollution.
29	Pl donate generously to Gujarat's ' <u>Beti bachao</u> ' and ' <u>Kanya kalyan abhiyan</u> '

You can contact us any time, since our vision is, all proponent should set up their environmentally sustainable unit, in Gujarat, at par with all EHS related major issues., we will be happy to share our views and expertise.,

in case, we are somewhere wrong in our review studies, pl. inform, us, we are positive, we will accept it.

**We welcome all industrial units & all environmental infra structure units in Gujarat, being supported by a good quality EIA report, with cent % ToR compliance and with least attracted technical queries.**

thanks ,



( pravinbhai p sheth )

Senior citizen, technocrat & environmentalist

file – lewans-san-dahej-290616

pl. excuse, for any type .type setting / spelling / vocabulary mistakes if any.

**WE ALL NEED A HELPING HAND – LET US PROTECT THE ENVIRONMENT**

**SAUNO SAATH –SAUNO VIKAS**

Annexure C-5

तारीख, २० जून २०१६ : पर्यावरण लोक सुनावणी की तारीख- २९ जून १६, सुबह १० बजे

रवाना,

विनोद एम्. जादव,

1/5, नवी वसाहत, लाहोरी गोडाउन,

भरूच , ३९२००१, गुजरात फोन : 8000986523

प्रति, member secretary- gpcb, gandhinagar, gujatratt , ms-gpcb@gujarta.gov.in,

कोपी, regional officer, gpcb, Bharuch,

bharuchgpcb@yahoo.com

चेरमेन, जिपिसिबी,

Chairman-gpcb@gujarat.gov.in

CEO, NABET

nabet@qcin.org

विषय, पर्यावरण लोक सुनावणी,

कंपनीका नाम- M/s. Lewens Labs Private Limited., at Plot No. D2/CH/376 & 377,  
GIDC - Dahej, Ta. Vagra, Dist. Bharuch

सुनावणी की तारीख.- २९ जून २०१६, सुबह १० बजे

माननीय महोदय श्री,

जिस कन्सलतंत ने इस कम्पनीका रिपोर्ट बनाया हैं उसका और जिस लेबोरेटरी में सभी सेम्पल टेस्ट किये उस लेबोरेटरी का सरकारसे दिया हुआ आज के तारीख का जारी किया हुआ मान्य सर्टिफिकेट पर कम्पनी का सही सिकका करके दीजिये और उसको मिनिट में लीजिए, क्यूंकि कल अगर ऐसा ना हो की सभी सर्टिफिकेट सही ना हो,

हमने हमारा पत्र, आदश के अनुसार **ms-gpcb** को भेजा हैं, तो जवाब सीधा MS-GPCB के नाम पर देना होगा और एक कोपी हमें हमारे पते पर भी मिलनी चाहिए.

आपका आभारी,

( )

# Gujarat Pollution Control Board



## Regional Office-Bharuch

C-1, 119/3, GIDC, Phase-2, Narmadanagar, Bharuch-392015

Website: [www.gpcb.gov.in](http://www.gpcb.gov.in)

### Annexure -D

A statement showing written replies given by Project Proponent of M/s. Lewens Labs Pvt. Ltd. to response and comments received in written format from others concerned persons in the Environment aspects for M/s. Lewens Labs Pvt. Ltd. for manufacturing of Synthetic APIs - 24.45 MT/Month and Bulk Drug Intermediates - 8.15 MT/Month before Public Hearing held on 29/06/2016 at 10:00 am at Project Site D2/CH/376 & 377, GIDC - Dahej, Ta. Vagra, Dist: Bharuch as per the Ministry of Environment and Forests, Government of India, New Delhi vide its Notification No. S.O. 1533 dated 14/09/2006 and its amendment S.O. 3067 (E) dated 01/12/2009.

Sr. No.	Comments Received in writing from Concerned Persons	Annexure	Reply given by the Project proponent
1	ShriJitendrabhaiBabalbhai Patel, Bharuch Dated 24/06/2016	D-1	M/s. Lewens Labs Pvt. Ltd. letter dated 29.06.2016
2	ShriMaheshbhaiPandya, ParyavaranMitra, Thaltej, Ahmedabad, Dated 16/06/2016	D-2	M/s. Lewens Labs Pvt. Ltd. letter dated 29.06.2016
3	ShriDharmeshbhaiMistry, Bharuch Dated 27/06/2016	D-3	M/s. Lewens Labs Pvt. Ltd. letter dated 29.06.2016
4	Shri P PSheth, Ankleshwar, Dated 28/06/2016	D-4	M/s. Lewens Labs Pvt. Ltd. letter dated 29.06.2016
5	ShriVinod M Jadav, Bahruch, Dated 29/06/2016	D-5	M/s. Lewens Labs Pvt. Ltd. letter dated 29.06.2016

२९ जून, २०१६

श्री जितेंद्रकुमार बाबूभाई पटेल

ए-४, गजानन पार्क सोसायटी,

आरबीएल स्कूल के पीछे,

जीआईडीसी, अंकलेश्वर

जिला.: भरुच

विषय: हमारी प्रस्तावित परियोजनाके लिए सार्वजनिक पर्यावरण जन सुनवाई

संदर्भ: सदस्य सचिव, जीपीसीबी, गांधीनगर को संबन्धित आपका पत्र, दिनांक २४ जून, २०१६

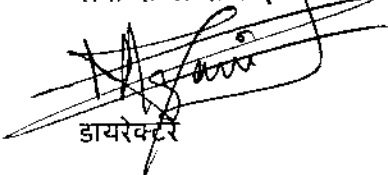
आदरणीय महोदय, हम आपके भेजे हुए पत्र की प्राप्ति में हैं और उपरोक्त विषय के संदर्भ में हम आपके द्वारा किए गए प्रश्नों के खिलाफ हमारी प्रतिक्रिया दे रहे हैं।

- १) आपकी कंपनी के डायरेक्टरो की दूसरे कौनसी जगह प्लान्ट है, उसको पर्यावरणके नियमों के तहत कभी क्लोजर या शोकोज नोटिस मिला है? अगर मिला है तो कोपी शामिल किजिए, और उसके बाद आपने क्या कदम उठाया।
३. लेवीन्स लेब्स प्राइवेट लिमिटेड के डायरेक्टर की कोई दूसरी इकाई नहीं है। तो यह पोइन्ट हमें लागू नहीं होता।
- २) आप शुद्ध पानीका उपयोग कम करने के लिए बारिश का पानीका स्टोरेज के लिए टैंक बनाने वाले हैं, उसकी क्षमता कितनी रहेगी? वह टैंक से आप एक सालमें कितना पानीकी बचत कर सकोगे?
३. हम बरसात के दिनों के दौरान छत के उपर का साफ़ पानी के संग्रह के लिए ५०-६० किलोलीटर की पानी संग्राहक टंकी प्रदान करेगे।
- ३) आप अपने प्लान्टसे निकलने वाला हेजाईस सोलिड वेस्ट किसको देने वाले है? उसके बारेमें कोइ MoU किया है? अगर किया है तो कोपि शामिल कीजिए।
३. ईटीपी स्लज/ एमइइ सोल्ट को लेन्ड फिलिंग के लिए टीएसडीएफ साईट में भेज दिया जाएगा उपयोग किए गए कोयले को जलाने के लिए CHWIF में भेजा जाएगा या सह प्रसंस्करण के लिए भेजा जाएगा। युइड ऑइल को पंजीकृत प्रोसेसर को बेचा जाएगा। कंटेनर पंजीकृत प्रोसेसर को बेचा जाएगा। आसवन अवशेषों और समय सीमा समाप्त दवाओं और बंद वीनिर्देश सामग्री जलाने के लिए CHWIF में भेजा जाएगा या सह प्रसंस्करण के लिए भेजा जाएगा। हम अपनी परियोजना की स्थापना से पहले TSDF/CHWIF की सुविधा सहित आम पर्यावरण इंफ्रास्ट्रक्चर की सदस्यता प्राप्त करेंगे।

- ४) आपके प्लान्टसे स्क्रबरसे SO<sub>2</sub>, HCl और NH<sub>3</sub> स्क्रब करने वाले हैं। वह सोल्यूशनका आप क्या करने वाले हैं। यह सोल्यूशनके लिए आपने किसी पार्टी का संपर्क किया है? उसके साथ MoU किया है? अगर किया है तो कोपि शामिल कीजिए।
- ५) हम स्क्रबर सोल्यूशन को इटीपी में ले जाएंगे और उसको दूसरे एफ्फ्लूअंट के साथ इटीपी में ट्रीटमेंट दी जायेगी। स्क्रबर सीस्टम के एचसीएल को कच्चे माल के रूप में इस्तेमाल किया जाएगा और इसको हमारे मामले में बेचने की कोई आवश्यकता नहीं है। इसलिए करार/समझौताजापन की कोई जरूरत नहीं।
- ६) रेनवोटर हार्वेस्टिंगके लिए आप आसपास के गाँवके तलाबोकी स्टोरेज क्षमता बढे और सवच्छता बढे वैसा प्रयास करे वैसी अपेक्षा है।
- ७) हम आपके सुझाव का स्वागत करते हैं। हमने आसपास के क्षेत्र में वर्षा जल संचयन प्रणाली विकसित करने की योजना बनाई है और उसके लिए, हम प्रस्तावित गतिविधि के औचित्य के लिए ग्रामीणों से और स्थानीय प्राधिकारी की राय लेंगे।
- ८) बारिश का कंटामिनेशन वाला पानी प्लान्ट के बहार ना जाए इसके लिए आप क्या कदम उठने वाले हैं।
- ९) हम उचित देखभाल के साथ वर्षा जल संचयन प्रस्तावित करेंगे। हम पहले बरसात के पाने को इटीपी में लेके उनको शुद्ध करेंगे। इसके बाद वाले वर्षा के जल को स्तरों पाने की चेनल के साथ जोड़ देंगे।
- १०) आपने इलेक्ट्रॉनिक्स वेस्ट के लिए किसी एजन्सी का संपर्क किया है?
- ११) नहीं, हमने अभी इलेक्ट्रॉनिक कचरे के लिए किसी भी एजेंसी के लिए संपर्क नहीं किया है। जरूरत पडने पर हम लोग पंजीकृत रीसायकलर/ प्रोसेसर का संपर्क करेंगे।
- १२) आपने आसपास के गाँव में मंचायत के कार्यालयके सिवा कैसे प्रचार किया उसकी सीडी सामेल करना। लाउड स्पीकरसे प्रचार किया हो तो उसकी सीडी सामेल करना।
- १३) हमने लाउडस्पीकर के माध्यम से आसपास के गाँवों में प्रचार किया है। उसकी सीडी जीपीसीबी को प्रस्तुत की है।

धन्यवाद

लेवीन्स लेब्स प्राइवेट लिमिटेड

  
डायरेक्टर

To,  
Jitendrakumar Babalbhai Patel  
A-4, Gajanan Park Society,  
B/h RBL school,  
GIDC, Ankleshwar  
Dist.: Bharuch

29/06/2016

**Sub:** Environmental Public Hearing for our proposed project.

**Ref:** Your letter addressed to the member secretary, GPCB, Gandhinagar, dated 24.06.2016

Respected Sir,

We are in receipt of your above referred letter and would like to give point wise reply/response against your points.

1. **Is there any other unit operated by Directors of this company? Whether it has received any closure or show cause notice under Environment Rules? If yes, then submit its copy and action taken to comply it.**
  - A.1 Director of Lewens Labs Pvt. Ltd. has no other unit hence this point is not applicable in our case.
2. **What capacity of storage tank will be provided for storage of rainy water to reduce fresh water? How much water will you save in a year?**
  - A.2 We will provide water storage tank of 50-60 kl for collection of clear roof top water during rainy days.
3. **Where will you disposed your Hazardous waste? Have you made any MoU? If yes, provide its copy.**
  - A.3 ETP sludge/MEE salt will be disposed off to approve TSDF site for landfilling. Used Charcoal will be sent to CHWIF for incineration or sent for co-processing. Used oil will be sold to registered re-processor. Discarded container will be sold to registered recycler. Distillation residue & Expired drugs medicines and off specification material will be sent to CHWIF for incineration or sent for co-processing. We will obtain membership of Common Environmental Infrastructure including TSDF/Common Incineration Facility before establishment of our project.



**4. You are going to scrub SO<sub>2</sub>, HCl and NH<sub>3</sub>. What will be management of this solution? Have you approached to any party? Or made MOU with or have you made any MOU? If yes, provide its copy.**

A.4 We will take scrubber solution in ETP and it will be treated in ETP with other effluent.

HCl from scrubber system will be used as a raw material and no sale of any spent acid require in our case. Hence no need of agreement/MoU.

**5. We wish that you try to make efforts for increase storage capacity & its cleanliness of ponds in nearby villages as a step towards rain water harvesting.**

A.5 We welcome your suggestion. We are also planned to develop rain water harvesting system in nearby area and for that, we will take the opinion from villagers as well as local authority for appropriateness of proposed activity.

**6. What arrangement will you take to prevent run off of contamination during Rain Water Harvesting outside of premises?**

A.6 We proposed rain water harvesting with due care to protect any contamination. We will take first rain water in to ETP for treatment. We will connect storm water after first rain water to channels of storm water.

**7. Have you approached any agency for electronic waste?**

A.7 No, still we have not approached to any agency for electronic waste. We will approach to authorized recycler/processors whenever it needed.

**8. Attach CD of how you have done publicity in nearby villages except office of Panchayat of nearby villages. If you have done publicity through loud speaker, then attach its CD.**

A.8 We have done publicity in nearby villages through loudspeaker. CD of same is submitted to GPCB.

Thanking You,

For, **Lewens Labs Pvt.Ltd.**

  
Director

To,

29.06.2016

Shri Mahesh Pandya,  
ParyavaranMitra,  
502, Raj Avenue, Bhaikaka Nagar Road,  
Thaltej, Ahmedabad - 380059  
Telefax - 079-26851321  
Email: [paryavaranmitra@yahoo.com](mailto:paryavaranmitra@yahoo.com)  
Website: [www.paryavaranmitra.org.in](http://www.paryavaranmitra.org.in)

**Sub:** Reply of EPH of M/s. LewensLabs Pvt.Ltd., GIDC Dahej, Dist. Bharuch on 29<sup>th</sup> June, 2016.

**Ref:** Your letter no. PM/MP/2696/2016, dated 16/06/2016

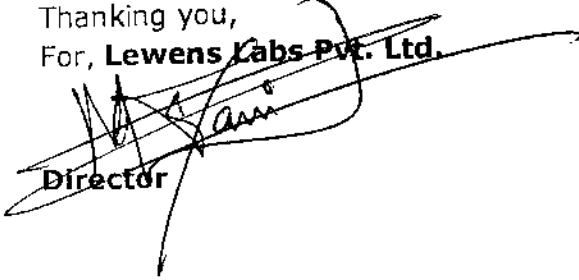
We are in receipt of a copy of your letter addressed to Member Secretary, GPCB, Gandhinagar. We have studied the points given in your letter and would like to give our reply/clarifications as under:

Q/A	RESPONSE BY PROJECT PROPONENT
Q1	<b>How the required land for the project is acquired? Was it a government or private land?</b>
Reply	Project site is located in Notified Industrial Estate of GIDC-Dahej & we have purchased land from GIDC. Copy of plot allotment letter is enclosed as <b>Annexure-I.</b>
Q2	<b>What was the previous land use of the land for proposed project? Has Industry obtained NAPermission for the land? Please provide the document.</b>
Reply	Project site is located in Notified Industrial Estate of GIDC-Dahej. We have purchased land from GIDC. Copy of plot allotment letter is enclosed as <b>Annexure-I.</b>
Q3	<b>How the required land for the project is acquired? Was it a government or private land?</b>
Reply	Project site is located in Notified Industrial Estate of GIDC-Dahej & we have purchased land from GIDC. Copy of plot allotment letter is enclosed as <b>Annexure-I.</b>
Q4	<b>When was environmental clearance for this project in Form I applied?</b>
Reply	We have submitted our EC application in Form-I on 09.03.2015 and TOR hard copy was issued by SEAC, Gujarat vide letter dated 06.08.2015. Then we have further submitted our proposal for amendment in TOR (change in list of production & respective TOR) vide our letter dated 12.08.15 & 22.12.15. TOR

	amended was issued by SEAC, Gujarat vide their letter dated 29.02.16.
<b>Q5</b>	<b>What is the status of NOC application to GPCB for this project?</b>
Reply	Still we have not applied for NOC application of GPCB for this project.
<b>Q6</b>	<b>What types of precautions will be taken for storage and transportation of hazardous material and waste?</b>
Reply	<p><b><u>Safety precaution at site:</u></b></p> <ul style="list-style-type: none"> <li>• Solvents will be stored in designated area in plant premises with flame proof fitting.</li> <li>• Storage Area Will Have Provision of Natural/Forced Ventilation.</li> <li>• Hydrogen cylinder handling area will be declared as flame proof zone.</li> <li>• PPEs will be given to workers.</li> </ul> <p><b><u>Safety Precaution during Transportation:</u></b></p> <ul style="list-style-type: none"> <li>• Hazardous chemicals are transport only in approved tanker by explosive departments.</li> <li>• Driver is equipped with TREM card and educate with hazardous characteristics of chemicals.</li> <li>• Follow guideline for transportation given in MSDS for respective chemicals.</li> </ul>
<b>Q7</b>	<b>Why baseline monitoring started even before approval of TOR? Please give exact dates of monitoring of each samples of ambient air and noise monitoring.</b>
Reply	We have submitted our EC application on 09.03.2015 and immediately started baseline monitoring. Then after we have apply for amendment in TOR (change in list of production & respective TOR) vide our letter dated 12.08.15 & 22.12.15. TOR amended was issued by SEAC, Gujarat vide their letter dated 29.02.16.
<b>Q8</b>	<b>Please justify domestic water requirement for proposed project.</b>
Reply	We have calculated domestic water requirement based on 85 lit/capita/shift for Industrial activity.
<b>Q9</b>	<b>Please give details of each ETP units.</b>
Reply	Details of each ETP units are given as <b>Annexure-II</b> .
<b>Q10</b>	<b>Please give name of Co-processor to whom used charcoal will be sent.</b>
Reply	At present, we have not finalized the name of Co-processor to whom used charcoal will be sent. We will finalize it at the time of pre-commission of the project.
<b>Q11</b>	<b>Please give name of SPCB approved dealer to whom discarded drums, carboys and plastic bags will be sent.</b>
Reply	It is our primary stage to start the industry so still we have not finalized the name of registered recycler/traders to whom discarded containers/bags will be sent.
<b>Q12</b>	<b>Please provide agreement/MOU with cement industries to whom distillate residue and Expired drugs/medicines and off specification material will be sent.</b>

Reply	Still we have not made any agreement/MoU with any cement industry for selling of distillate residue and expired drugs medicine & off specification.
<b>Q13</b>	<b>Why only 3000 sq.mof total land area will be developed for greenbelt rather than guideline of at least 33%?</b>
Reply	We will develop greenbelt in 30% of total land areainside the factory premises and 3-5 % of greenbelt area will be developed outside the premises at appropriate places in GIDC.
<b>Q14</b>	<b>What types of the socio-economic development activities industry will take up as a part of CSR activity?</b>
Reply	Various CSR activities identified & planned are - education, drinking water & sanitation, health check-up camps, children development activities. We have earmark Rs. 10.0 lakhs every year for first five years for CSR activity and area of CSR activity will be finalized after discussion with leader of local affected villagers.
<b>Q15</b>	<b>How many local people will get employment through this proposed project? .</b>
Reply	About 60 nos. of persons will be employed during operation phase of project. We will give preference to 80% of unskilled local people for the employment in our industry.

Thanking you,  
 For, **Lewens Labs Pvt. Ltd.**

  
**Director**

Annexure-I

**GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION**  
(A GOVT. OF GUJARAT UNDERTAKING)



Office of the Deputy Executive Engineer (Const. Division.),  
1st FLDOR, NARMADA COMM. COMPLEX,  
STATION ROAD, PANCHBATTI,  
BHARUCH - 392 001  
Ph- 02642-242432/244184 FAX - (02642)241902

NO:GIDC / DEE /Dahej-II/ 208

DATE: 27/04/2015

(1) Offer Cum Allotment No. : GIDC / DM/CG/ANK/ALT/75 Date : 09/01/2015  
(2) Handing Over Possession No. : GIDC / DM /CG/ANK/662 Date : 15/04/2015

**Possession Receipt**

In pursuance of allotment of Ind. Plot / Chemical Zone/ ~~Service Plot / Comm. plot / Hsg. plot No. / Hsg. qt. No. / ched No. Plot No. D-2/CH/376-377~~ admeasuring 10000.00 sq.mt (T) situated in the ~~housing/~~ industrial phase Dahej -II "As is Where is basis " consisting survey No 236/P, 237/P, 238/P, 246/P within the village limits of Galenda at GIDC Industrial estate Dahej-II, Ta. Vagra, Dist Bharuch is handed over to day i.e on 27/04/2015 in good condition The Said Premises Are Bounded As Follows :

Plot No: **PLOT NO. D-2 /CH/376-377**

On towards North By	Plot No.D-2/CH/375
On towards South By	Plot No. D-2/CH/378
On towards East By	70-00mt wide Corridor, 45.00mt Road
On towards West By	Plot No.D-2/CH/389 & Plot No. D-2/CH/390

Possession Taken Over By :

Shri Moksha Udani

Sign :

Possession Handed Over By:

Shri :- S.J.Merchant

Sign :-

Desi :-

Place : GIDC / Dahej - II

Date : 27/04/2015

Desi :-Assistant Engineer, Dahej -II

Place : GIDC/ Dahej - II

Date : 27/04/2015

Note : The plot is handed over on "As is where is basis ", as demarcated by the surveyor at site as per proposed field book without any encroachment.

Copy to :

Shri Moksha Udani  
4, Kundan, dipali Society,  
B/h. Pritam Society, Maktampur Road,  
Bharuch.

- (1) The R M GIDC / Ankleshwar.
- (2) The A O GIDC / Ankleshwar.
- (3) The Executive Engineer Const. Div. GIDC, Dahej - II; Bharuch.
- (4) The Dy Ex Engineer (W/s ), GIDC, Bharuch.
- (5) The Dy.Ex Engineer ( Drg). GIDC, Bharuch.

Sign Df Party

Deputy Executive Engineer  
GIDC, Dahej- II, Bharuch.

**Annexure-II**

**Name and size of ETP units**

Sr. No.	Name	Size, meter	Capacity, m <sup>3</sup>
1	Oil & Grease Trap	3 m x 1.75 m x 1.5 m	7KL
2	Equalization/ Neutralization Tank	3 m x 3 m x 2.5 m	20 KL x 3
3	Filter press	34 plates	1.2 MT
4	Collection sump	3 m x 2.5 m	20KL
5	Primary Aeration tank	8 m x 5 m x 4 m	150 KL
6	Primary Clarifier	3 m	10KL
7	Secondary Aeration tank	8 m x 5 m x 4 m	150 KL
8	Secondary Clarifier	3 m	10KL
9	Chemical Solution Tank	1.5 m x 2.5 m	5KL
10	Chemical solution house	3 m x 3 m	--
11	Sludge drying bed	6 m x 6 m x 2 m	--
12	Sand filter	Standard supply	5KL
13	Carbon filter	Standard supply	5KL
14	Treated water tank	3 m x 5 m	75 KL
15	Solvent Strippers	Standard supply	--
16	R.O.	Standard supply	40 KL/day
17	M.E.E./ single/two stage evaporators	Standard supply	1 x 15 KL 1 x 10 KL

પ્રતિશ્રી,

૨૯.૦૬.૨૦૧૬

ધર્મેશ મિસ્ત્રી,

બ્લોક નં ૧૪, ઘર નં ૧૩૪૦, નર્મદા એપાર્ટમેન્ટ,

મામલતદાર કચેરીની સામે,

ભરૂચ

વિષય:લેવીન્સ લેબ્સ પ્રાઇવેટ લિમિટેડની પર્યાવરણીય લોક સુનાવણીબાબતેસુચનો/વાંધાઓ

સંદર્ભ: આપના 27/06/2016 ના પત્ર ના અનુસંધાનમાં

મહેરબાન સાહેબ શ્રી,

આપના તરફથી ઉપરના સંદર્ભના અનુસંધાનમાં મળેલ પત્ર નો નીચે મુજબ જવાબ આપીએ છીએ.

૧. કંપની કન્સલ્ટન્ટના QCI-NABET તરફથી એપુલ્ક કરેલા ફકશન એરિયા એક્સપર્ટના નામો તથા તેઓએ જે તે એરિયામાં કરેલ કામ અને તેમની સહીનો EIA રિપોર્ટના ચેપ્ટર - ૧૨ માં સમાવેશ કરવામાં આવ્યો છે. QCI-NABET સર્ટિફિકેટ ની સેલ્ફ સર્ટિફિકેટ કોપી આ સાથે બિડાણમાં છે.
૨. આ રીપોર્ટમાં સામેલ કન્સલ્ટન્ટના અધિકારીઓમાંથી ૫ કાયમી પગારદાર છે કે જેઓએ આ EIA અભ્યાસ માં ભાગ લીધો છે.
૩. કન્સલ્ટન્ટ એ બહારથી લીધેલા ફકશનલ એરિયા એક્સપર્ટ અને કન્સલ્ટન્ટ વચ્ચે થયેલ કરારની નકલ કન્સલ્ટન્ટ એ QCI-NABET ને આપેલ છે.
૪. વિગત નીચે મુજબ છે.  
પી. કે શ્રીવાસ્તવ એ EQMS India Pvt. Ltd., New Delhi અને San Envirotech Pvt. Ltd., Ahmedabad સતિશ બોરડ San Envirotech Pvt. Ltd., Ahmedabad તથા હર્દિક પટેલ San Envirotech Pvt. Ltd. અને EQMS India Pvt. Ltd., New Delhi માટે કામ કરે છે.
૫. અમારા કન્સલ્ટન્ટ આ બાબતે ગુપ્તતા રાખવા માંગે છે, જેથી માહિતી અહીં રજૂ કરેલ નથી આ તેમની આંતરિક બાબત છે.
૬. અમારા કન્સલ્ટન્ટ આ બાબતે ગુપ્તતા રાખવા માંગે છે, જેથી માહિતી અહીં રજૂ કરેલ નથી આ તેમની આંતરિક બાબત છે.
૭. Environment Impact Assessment નો અભ્યાસ, તેનું ડોક્યુમેન્ટેશન અને પર્યાવરણીય લોકસુનાવણીમાં મદદરૂપ થવું એ કન્સલ્ટન્ટ ની પ્રોજેક્ટ બાબતે જવાબદારી છે.



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૮. ફી ની બાબત એ કંપની અને કન્સલટન્ટ ની અંગત બાબત હોઇ આ જગ્યાએ જાહેર કરતા નથી.
૯. પ્રોવિઝનલ એક્રીડિટેશન સર્ટીફિકેટ ની વેલીડિટી ૨૧/૧૨/૨૦૧૬ સુધીની છે અને સેલ્ફ સર્ટીફાઇડ કોપી આ સાથે બીડલ છે.
૧૦. કન્સલટન્ટના એક્રીડિટેશન સર્ટીફિકેટ ની વેલીડિટી બાબત જીપીસીબી દ્વારા QCI-NABETની પાસેથી અભિપ્રાય લેવામાં આવેલ છે. આથી બાંહેધરી પત્રક આપવાની જવાબદારી રહેતી નથી.
૧૧. અમારાકન્સલટન્ટ એ જણાવ્યું કે તેઓ હવે પછીના ઇઆઇએ રીપોર્ટ ના કાર્યકારી સારાંશમાં માં દરેક પેજ પર કન્સલટન્ટ નું નામ સામેલ કરશે.
૧૨. આ બાબત માં કન્સલટન્ટની જવાબદારી રહેશે અને તેનું નામ અને સરનામું નીચે મુજબ છે.  
સન એન્વાયરોટેક પ્રાઇવેટ લિમિટેડ, ૪૨૪, મેડીસીન માર્કેટ, પાલડી ચાર રસ્તા, અમદાવાદ.
૧૩. તમે જણાવેલ સર્ટીફિકેટ QCI-NABET તરફથી EIA નું કામ કરવા માટે માન્ય ડોક્યુમેન્ટ તરીકે કન્સલટન્ટ ને આપેલ છે આથી કન્સલટન્ટે તે મૂકેલ છે.
૧૪. અમોએ આ જગ્યા ગુજરાત સરકારના સાહસ GIADC પાસેથી લિધેલ હોઇ લેન્ડ લૂઝર્સ ના નામ અમારી પાસે અપ્રાપ્ય છે.
૧૫. NABET-QCI નું એક્રીડિટેશન સર્ટીફિકેટ માં EIA રિપોર્ટમાં મૂકવામાં આવેલ છે.
૧૬. કન્સલટન્ટ નું NABET-QCI નું એક્રીડિટેશન સર્ટીફિકેટ EIA રિપોર્ટમાં એનેક્સર- ૮ તરીકે બીડાણ કરેલ છે.
૧૭. કન્સલટન્ટ નું NABET-QCI નું એક્રીડિટેશન સર્ટીફિકેટ EIA રિપોર્ટમાં એનેક્સર- ૮ તરીકે બીડાણ કરેલ છે.
૧૮. ઇઆઇએ રીપોર્ટનું પ્રેઝન્ટેશન કરનાર વ્યક્તિ નું નામ ડો. મહેન્દ્ર સાદરિયા, સંસ્થા - સન એન્વાયરોટેક પ્રાઇવેટ લિમિટેડ, ૪૨૪, મેડીસીન માર્કેટ, પાલડી ચાર રસ્તા, અમદાવાદ.
૧૯. આ અમારી લોકસુનાવણીના સંદર્ભ નો મુદો ન હોવાથી આ મુદાનો જવાબ જરૂરી જણાતો નથી.
૨૦. આ અમારી લોકસુનાવણીના સંદર્ભ નો મુદો ન હોવાથી આ મુદાનો જવાબ જરૂરી જણાતો નથી.

આભાર સહ,

આપનો વિશ્વાસુ,

લેવીન્સ લેબ્સ પ્રાઇવેટ લિમિટેડ

  
M. S. D. D.  
DIRECTOR





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Annexure -D-3 (English)

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To,  
Dharmesh Mistry,  
Block No. 14, House no. 1340,  
Narmada Apartment,  
Opp. Mamaltdar Office, Bharuch  
M: 9033531115

29.06.2016

Sub: Suggestions/objections in Environment Public Hearing of Lewens Labs Pvt. Ltd.  
Ref: Your letter dated 27.06.2016

Respected Sir,

We are in receipt of your above referred letter and would like to submit following point wise clarifications/details.

1. Pls. provide the name of functional area experts approved by QCI-NABET in Consultancy Company, where they have worked, with their validity & incorporate self-certify copy of certificate in MOM.

**Ans.** Functional area experts approved by QCI-NABET & their respective work in different area are of EIA incorporated in chapter-12 of EIA report. Self-certified copy of QCI-NABET certificate is enclosed herewith.

2. Functional Area Experts approved by QCI-NABET are permanent employee of consultancy firm or not? Pls. provide the information.

**Ans.** 5 Functional area experts, out of 8, are permanent employee of consultancy firm who are involved in the preparation of this EIA report.

3. We request to include copy of MOU between approved empanelled experts by QCI-NABET & consultancy firm?

**Ans.** Consultant has submitted MOU between approved empanelled experts & consultancy firm to QCI-NABET.

4. Pls. provide the information about empanelled expert approved by QCI-NABET in EIA report of public hearing signed other than this company.

**Ans.** Details are given below:

P K Srivastva is working with EQMS India Pvt. Ltd., New Delhi & San Envirotech Pvt. Ltd., Ahmedabad, Satish Borad is working with San Envirotech Pvt. Ltd., Ahmedabad and Hardik Patel is working with EQMS India Pvt. Ltd., New Delhi & San Envirotech Pvt. Ltd., Ahmedabad.

5. How much fees paid by consultant to QCI-NABET approved empanelled experts?

**Ans.** Our Consultant want to keep this matter confidential hence not declare here & it is internal matter of our Consultant.

6. We request to incorporate salary slip of employee since last 18 months who are approved in-house experts by QCI-NABET.

**Ans.** Our Consultant want to keep this matter confidential hence not declare here & it is internal matter of our Consultant.

7. Provide the information related with responsibilities of consultant to this project & public hearing.

**Ans.** Consultant's responsibility includes - to carry out EIA study, its documentation & assistance during the PH.

8. Provide the information regarding the fees paid by project proponent to consultant.

**Ans.** It is our consultant's and our internal matter so not disclose here.

9. Pls. incorporate self-certify valid document of accreditation certificate which is part of EIA report.

**Ans.** Self-certify copy of document of accredited certificate provided by consultant is enclose herewith & it is valid up to 21/12/2016.

10. Pls. incorporate undertaking in MOM related with legal action will be taken by GPCB if document of accreditation is not valid as on today.

Ans. Opinion is taken by GPCB from QCI-NABET regarding validity of accreditation certificate document of consultant. Hence no need to submit an undertaking.

11. Pls. inform that why consultant has not mentioned their name on each page of executive summary in Gujarati of EIA report.

Ans. Our consultant has informed that, they will incorporate their name on each page of executive summary of EIA report now onwards.

12. Pls. inform name & address of responsible person if any legal issue arise in future in respect of no name of consultant is mentioned on each page of Gujarati executive summary of EIA report.

Ans. Consultant will be responsible for that and their information is given below:

San Envirotech Pvt. Ltd.

424, Medicine market, Paldi Cross Road

Ahmedabad

13. NABET-QCI accreditation certificate is asked in TOR point No. 49, so why they have incorporated provisionally accredited certificate vide letter no. NABET/QCI, vide letter No. NABET/EIA/327/IA 14 dated 12/05/2014.

Ans. Above referred letter no. is certificate issued by NABET-QCI to our consultant for carry out EIA study hence consultant has incorporated it.

14. Provide name & address of land losers.

Ans. We have purchased plot from GIDC, a Govt. of Gujarat undertaking hence we have no information about land losers.

15. Incorporate valid accreditation certificate by NABET-QCI in MOM.

Ans. Consultant has incorporated valid accreditation certificate in the EIA report.

16. Pls. give the reason why valid accreditation certificate issued by NABET-QCI is not enclosed in EIA report?

Ans. EIA consultant has enclosed NABET-QCI valid certificate as Annexure-VIII of EIA report.

17. Consultant has valid accreditation certificate by NABET-QCI or not?  
Ans. EIA consultant has enclosed NABET-QCI valid accreditation certificate as Annexure-VIII of EIA report.
18. Pls. incorporate photocopy of identity card of representative of EIA report preparation, their designation with name of institute & their address.  
Ans. The name of person is Dr. Mahendra Sadaria, Name of organization is San Envirotech Pvt. Ltd., 424, Medicine Market, Paldi cross road, Ahmedabad.
19. We, Dharmesh Mistry, has suggested some points bearing 4, 5, 6 & 8 during public hearing of Parshwnath Pigments Ltd., Jambusar conducted on 16.12.2015 & consultant has not give its reply satisfactorily. Their consultant was San Envirotech Pvt. Ltd.  
Ans. This point is not relevant with our public hearing hence may not require to give the reply.
20. We, Dharmesh Mistry, has suggested some points bearing 4, 5, 6 & 8 during public hearing of Parshwnath Pigments Ltd., Jambusar conducted on 16.12.2015 & consultant has not give its reply satisfactorily. Their consultant was San Envirotech Pvt. Ltd. Pls. do needful to provide satisfactory reply from them.  
Ans. This point is not relevant with our public hearing hence may not require to give the reply.

Thanking You,

For, **Lewens Labs Pvt. Ltd.**



Director



National Accreditation Board  
for Education and Training

NABET/EIA/327/IA14

May 12, 2014

The Director  
San Envirotech Pvt. Ltd.  
424, Medicine Market,  
Opp. Shefali Centre, Paldi Cross Road,  
Paldi, Ahmedabad-380007  
(Kind Attention: Dr. Mahendra Sadaria)

Dear Sir,

**QCI – NABET Scheme for Accreditation of EIA Consultant Organization**

This is with reference to your application to QCI – NABET for Accreditation as EIA Consultant Organization.

We are pleased to inform you that based on Document & Office Assessments, the Accreditation Committee has recommended provisional accreditation of your organization as per the scope given in Annexure II and III. Also find attached herewith the following:

- Results of various aspects of assessment of your organization (Annexure I).
- Non-Conformances/Observations/Alerts issued after Initial Assessment (Annexure IV).
- Detailed Terms & Conditions of accreditation (Annexure V).
- Guidelines for addressing Non-Conformances/ Observations/ Alerts (Annexure VI).
- Format to be followed for mentioning the names of the experts involved in EIA reports prepared by San Envirotech Pvt. Ltd. (Annexure VII).

Please confirm the correctness of spellings of the names of the experts mentioned in Annexure III. Please also check the QCI website for the Minutes of the Accreditation Committee Meeting January 22 and February 13, 2014 for observations related to your application, for compliance. You are advised to visit QCI website to check clarifications on the Scheme issued from time to time for necessary actions at your end.

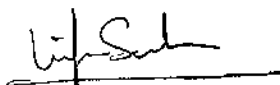
The accreditation of your organization will be for a period of three years starting December 21, 2013, the date of office assessment. The continuation of the accreditation will be confirmed based on surveillance assessment to be carried out after 18 months from the date of Initial accreditation. Surveillance assessment will be conducted to ensure compliance with NABET Scheme including the details mentioned in your Quality Manual and the terms & conditions mentioned in Annexure V.

May we request you for your confirmation of acceptance of the terms and conditions attached. Compliance to above will enable us to issue you the requisite accreditation certificate.


We thank you for your esteemed support in making this Scheme successful and for your participation in this national cause.

Thanks and best regards,

Yours sincerely,

  
(Vipin Sahni)  
C.E.O.

*Self Certified by*

  
Dr. Mahendra Sadaria  
San Envirotech Pvt. Ltd.



Result of Initial Accreditation

Annexure I

EIA Consultant Organization	San Envirotech Pvt. Ltd.
Contact Person	Dr. Mahendra Sadaria
Date of Assessment	December 20-21, 2013


OFFICE ASSESSMENT AND INTERACTION WITH EXPERTS		
S.No.	Aspect*	Marks Scored/ Marks allocated
1.	Quality of personnel	
	i. EIA Coordinator/s	12.4/20
	ii. Functional Area Expert/s	11.55/20
2.	Development of and conformance to Quality Manual	9/15
3.	Field investigation and Laboratory Work	13.5/20
4.	Completeness of EIAs prepared by Applicant	6/10
5.	Organizational evaluation	8.5/15
	<b>TOTAL</b>	<b>60.95/100</b>

\* For details covered by various 'aspects' of assessment, vide section 2.1 of EIA Accreditation Scheme, Rev. 09/ August 2011.

Scope of AccreditationAnnexure II

Name of the Consultant: **San Envirotech Pvt. Ltd.**  
424, Medicine Market,  
Opp. Shefali Centre, Paldi Cross Road,  
Paldi, Ahmedabad-380007

Sl. No.	Sector No.	Name of Sector	Category A/B
1	4	Thermal Power Plants	B
2	9	Cement Plants	B
3	17	Pesticides industry and pesticide specific intermediates (excluding formulations)	A
4	21	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)	A
5	38	Building and large construction projects including shopping malls, multiplexes, commercial complexes, housing estates, hospitals, institutions	B
<b>Total = 5 Sectors*</b>			
<i>*Sectors allocated to individual EIA Coordinators are mentioned in Annexure III.</i>			

  
(Vipin Sahni)  
C.E.O.



**QCI – NABET Scheme for Accreditation of EIA Consultant Organizations****List of Experts****Annexure III****EIA Co-ordinators (ECs)**

Sl	Name	Sectors			Cat	Remarks
		Applied by AO	Recommended by Assessors	Approved by AC		
<b>In-house</b>						
1	Mahendra Sadaria	4	Yes	Yes	B	None
		9	Yes	Yes	B	
		17	Yes	Yes	A	
		21	Yes	Yes	A	
		38	Yes	Yes	B	
2	Rajesh Solanki	21	No	No	-	Not recommended due to inadequate EIA experience.
3	Khyati Thacker	13	No	No	-	Clarifications to be sought for specific experience in sector 21.
		16	No	No	-	
		17	No	No	-	
		21	-	-	-	Not recommended for sectors 13, 16, 17 due to inadequate sectoral experience
4	Diti Patei	21	No	No	-	Not recommended due to inadequate EIA experience.
		38	No	No	-	
<b>Empanelled</b>						
5	C. Lai	1	No	No	-	Not recommended due to lack of clarity of sector including its environmental aspects
6	Sanjay Painitkar	16	No	No	-	Not considered being in-house employee of another organization.
		27	No	No	-	
		21	No	No	-	
		31	No	No	-	
		33	No	No	-	



Functional Area Experts (FAEs)

Sl	Name	Functional Areas (FAs)			Cat	Remarks
		Applied by AO	Recommended by Assessors	Approved by AC		
In-house						
1	Mahendra Sadaria	AP	Yes	Yes	A	*HW and ISW only Not recommended for MSW due to inadequate experience.
		AQ	Yes	Yes	A	
		WP	Yes	Yes	A	
		SHW	Yes*	Yes*	A*	
2	Shobhna Sadaria	SE	-	-	-	Clarifications to be sought on actual experience in the functional area. To submit specific response and not mention generic comments
3	Rajesh Solanki	WP	No	No	-	Not recommended for any FA due to lack of clarity and comprehension of the FAs including their environmental aspects.
		AP	No	No	-	
		RH	No	No	-	
		SHW	No	No	-	
4	Khyati Thacker	AQ	Yes	Yes	A	*HW only
		EB	Yes	Yes	B	Not recommended for ISW and MSW due to inadequate experience.
		SHW	Yes*	Yes*	B	
5	Shaliesh Patel	WP	No	No	-	Not recommended for any FA due to lack of clarity and comprehension of the FAs including their environmental aspects.
		AP	No	No	-	
		SHW	No	No	-	
6	Mehul Panchal	WP	No	No	-	Not recommended for any FA due to lack of clarity and comprehension of the FAs including their environmental aspects.
		AP	No	No	-	
7	Diti Patel	AP	Yes	Yes	B	Not recommended for AQ due to lack of clarity and comprehension of the FA including its environmental aspects.
		WP	Yes	Yes	B	
		AQ	No	No	-	
8	Shreya Bhatt	WP	Yes	Yes	B	Not recommended for SHW due to lack of clarity
		SHW	No	No	-	



Sl	Name	Functional Areas (FAs)			Cat	Remarks
		Applied by AO	Recommended by Assessors	Approved by AC		
Empanelled						
9	G. A. Patel	EB	Yes	Yes	A	None
10	P. K. Shrivastva	RH	Yes	Yes	A	None
11	Hardik Patel	HG	Yes	Yes	A	None
		GEO	Yes	Yes	A	
12	C. Lal	HG	Yes	Yes	B	None
		GEO	Yes	Yes	A	
13	Satish Borad	LU	Yes	Yes	B	None
14	Arun Yadav	RH	No	No	-	Not recommended for RH and NV due to lack of clarity and comprehension of the FAs including their environmental aspects.
		NV	No	No	-	
15	Rupabhai Malakiya	SE	-	-	-	Absent during interaction
16	Ashwin Sadaria	SC	No	No	-	Not recommended for SC due to lack of clarity and comprehension of the FA including its environmental aspects.
17	Sanjay Palnitkar	AP	No	No	-	Not considered being in-house employee of another organization.
		WP	No	No	-	
		RH	No	No	-	
		SHW	No	No	-	

## 1.4 Associate FAE (AFAE)

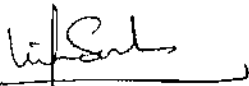
Sl	Name	Functional Areas (FAs)			Cat	Name of Senior Expert	Remarks
		Applied	Recommended	Approved			
In-house							
1	Henal Mehta	EB	No	No	-	-	Not recommended for EB due to lack of clarity and comprehension of the FA including its environmental aspects.
		WP	Yes	Yes	B	Diti Patel	
		AP	Yes	Yes	B	Diti Patel	

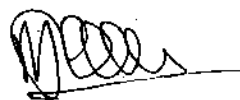


The organization is provisionally accredited for sectors as mentioned in Annexure II subject to inducting FAEs in the following areas at the earliest but not later than three months from the date of communication by NABET.

1. For SE\*\* and MSW - In-house expert/s (\*\*clarifications sought)
2. For NV and SC - In-house/empanelled experts

Final Accreditation will be subject to the fulfilment of the above requirements.

  
(Vipin Sahni)  
C.E.O.



Non-Conformances/ Observations

Annexure IV

Based on Initial Assessment (IA) and Decisions of Accreditation Committee

Name of ACO -

San Envirotech Pvt. Ltd.

Date of IA AC Meeting	Date of intimation of NCs/ Obs. to ACD by NABET	Last date for submission of the closure of NCs/ Obs.	Date of submission of closure action (to be filled in by the ACO)
January 22, February 13, 2014	April 29, 2014	July 29, 2014	

Kindly submit response to the stated NCs/ Obs. within stipulated timeframe in the format given below.

The case of San Envirotech Pvt. Ltd., Ahmedabad was discussed in 116<sup>th</sup> IA AC meeting held Jan.22, 2014 wherein certain clarifications were sought on the assessment. These clarifications have since been received and considered by the Accreditation Committee.

S.No.	NC/ Observation	Response of ACO (root cause analysis/ corrective & action plans) <i>May use additional enclosures</i>	Closure by Assessors
<b>Non Conformance</b>			
1	In-house experts for MSW and SE not available.		
<b>Observations – Quality Management System (QMS)-</b>			
	<b>Quality Manual – Development &amp; conformance</b> <ul style="list-style-type: none"> <li>- All procedures mentioned in the scheme are not covered.</li> <li>- The quality manual does not cover reviews and audit records, Assessment of experts (IH and EMP), Outsourcing etc.</li> <li>- The Quality policy is not in line with the NABET guidelines.</li> <li>- No Management Reviews done.</li> <li>- Communication about the quality manual within the organization is poor. MR responsibilities not defined. Only one copy of QM available in the organization.</li> </ul>		
	<b>Field Investigation and Laboratory Work</b> <ul style="list-style-type: none"> <li>- Project site specific field</li> </ul>		



	logbooks not maintained for biotic environment.		
	<p><b>Completeness of EIA Reports'Draft EIA report for ChenitanColor Chem. Pvt. Ltd. Dahej (Aug'2013)'</b></p> <ul style="list-style-type: none"> <li>- The data presented has duplication at number of places and not adequately covered as per TOR.</li> <li>- The data used for SE and EB studies are Secondary.</li> <li>- EMP is based on Ad-hoc basis with data on budget based on information furnished by Client and not authenticated.</li> <li>- TOR conditions not complied.</li> </ul>		
	<p><b>Organizational Evaluation</b></p> <ul style="list-style-type: none"> <li>- Informal system available for assessing the performance of the experts.</li> <li>- No activity chart (with milestones) from start to completion for the EIA projects prepared by the organization.</li> </ul>		

\*Refer Annexure VI of the letter for guidelines for closing NCs and Observations

**Abbreviations used:**

ACO: Accredited Consultant Organization

MNC: Major Non Conformance

NC: Non Conformance

Obs.: Observations

**Name of the C.E.O./Authorized signatory of**

**ACO:**

**Signature:**

**Date:**



Terms and conditions

The accreditation of **San Envirotech Pvt. Ltd.** as EIA Consultant Organization is subject to compliance to requirements of QCI – NABET Scheme and following conditions but not limited to:

1. During the entire period of accreditation, minimum 3 approved IH experts (1 EC and 2 other FAEs) must be available with the Accredited Consultant Organization (ACO). Should this number fall below three at any point of time, NABET must be informed and the shortfall made up within one month.
2. The ACO must have access to all 5 core functional areas (FAs) during the entire period of accreditation. FAs - AP, WP, SHW must be covered by in-house (IH) experts. SE and EB may be covered by IH/ empanelled experts. If these two FAs (SE, EB) are covered by empanelled experts then they are to be supported by IH Associate experts. The balance FAs may be covered by IH/Empanelled experts.
3. If an ACO is accredited only for sector 3B (Building and large Construction), it may have approved empanelled experts for SE and EB and they need not be backed up by in-house Associate FAEs.
4. The ACO agrees to surveillance assessment as required by the Scheme for continuance of its accreditation.
5. On completion of three years, a complete re-assessment would be undertaken which will include document assessment, and office assessment for continuation of NABET Accreditation.
6. An ACO is required to take up EIA assignments in the accredited sectors only and for the category accredited for. Any deviation viz, taking up EIAs in unapproved sector or category, using unapproved EC/FAE shall be considered as a Non-Conformance and a show cause would be issued to the ACO as to why accreditation/ approval for the concerned sector/ expert should not be cancelled.
7. Proposing and obtaining approval of candidates for balance area/s as per relevant minutes of meeting must be taken on priority by the ACO. Following should be considered while proposing candidates for covering these areas:
  - i. Propose candidates as per relevant MoM for 'balance functional areas' only.
  - ii. Ensure that proposed candidates meet the qualification/experience requirements as specified in the Scheme.
  - iii. Submit the proposal for covering balance area/s in one go.
8. Field investigation and Laboratory arrangements:
  - a. The EC and relevant FAEs must visit the project site for appropriate duration, both prior to and during the process of collection of primary data and ground verification of secondary data. They must also be involved in selection of sampling locations and type and collection of samples. For selection of Ambient Air Quality stations, the EIA team of the ACO must carry out necessary home work including running dummy dispersion modeling prior to visiting the site. All experts must maintain field logbooks for work carried out during the site visits. Documentary evidence like travel/ hotel bills should also be maintained for inspection by NABET assessors.
  - b. An ACO must use NABL accredited/ MoEF recognized laboratories only for collection of baseline data.
  - c. If the laboratory is an external one, a MoU is to be signed with the laboratory specifying name of the laboratory, scope of work including parameters covered and sampling



- methodologies etc., period of association and financial terms. The MoU should be signed by the CEOs/ authorized signatories of the two organizations. (kindly refer explanatory notes I dated Oct. 19, 2012 uploaded on QCI website)
- d. ACO using internal NABL accredited/ MoEF recognized laboratories should have protocols for selection of sampling locations, collection, preservation, transportation, testing and analysis of samples and calibration of equipment/ instruments/ glass wares.
  - e. ACO utilizing external NABL accredited/ MoEF recognized laboratories, in addition to the 8 d. above should have protocols of the applicant for ensuring quality and integrity of the work carried out by the external laboratory.
  - f. The work carried out by the laboratory for each project must be documented and signed by the authorized signatory on behalf of the laboratory. Such documents must be available with the ACO for inspection by NABET assessors.
  - g. The name of laboratory and analysis result signed by head of the laboratory must be included in all EIA reports prepared by the ACO.
  - h. Biotic Environment and Socio- Economic data: As a part of Quality Management System (QMS), the ACO must have written down methodologies for collection of primary data on Biotic (Ecology and Biodiversity) and Socio Economic environment including field equipments, accessories, questionnaire, interview formats etc. to be used for studies/ surveys and ground truthing of secondary data.
9. Systems/ procedures documented in the Quality Manual of the ACO to meet the requirements of the NABET EIA Consultant Accreditation Scheme, must be implemented meticulously.
  10. For in-house experts, detailed records of Appointment Letter with definite terms and conditions, joining letter from the expert and attendance record are to be maintained by the organization. An in-house expert is defined as a full time employee working on the pay rolls of the organization on regular basis (not on time to time/ as an when required/ assignment basis) and is paid appropriately as per his/her qualification and experience.
  11. The ACO must ensure empanelled experts approved for/proposed by them are not associated with more than 4 other EIA Consultant Organizations. MoUs are to be signed between the ACO and concerned empanelled experts giving the name of expert, scope, terms and period of engagement. (kindly refer explanatory notes I dated Oct. 19, 2012 uploaded on QCI website)
  12. All payments to experts, both in-house and empanelled shall be made by cheque/ bank transfer and relevant records of TDS etc. to be maintained by the ACO.
  13. The name of EIA Coordinators and FAEs involved shall be recorded in all EIA reports as per format attached (Annexure VII) at the beginning of the report. These reports should contain original signatures (not scan) of the EIA Coordinator and the FAEs involved. This should be also authenticated by the head of the consultant organization as per the attached format.
  14. Maintaining a register of attendance of employees involved in EIA assignments.
  15. Keeping records of the experts being involved for various EIA projects handled during this period.
  16. Maintaining records of involvement of time of empanelled experts In various EIA assignments.
  17. Keeping in view the extensive involvement of the EIA Coordinator in preparing EIAs as envisaged in the Scheme, the maximum number of EIAs that an EC may be able to coordinate in a year will be as follows:
    - a) For Category A projects – 6 Nos\*
    - b) For Category B projects – 10 Nos\*
    - c) in combination of Category A and B projects – 10 Nos

\*The above will not be applicable for 'EIAs' prepared for Sector 38 – Building and Large Constructions and EIAs for very small mining leases (less than 5 ha) including river bed mining. For these sectors, the maximum number of 'EIAs' that an EC may carry out in a year, will be 15.



- If an EC carries out more than above number of EIAs, s/he will need to justify her/his involvement in the EIAs during Surveillance Assessment supported by Field logbooks.
18. Timely replacement of experts – In case an approved EC/FAE leaves the ACO, the same must be intimated to NABET immediately and a suitable replacement proposed within one month. No unapproved persons should be utilized as an EC or FAE for EIA preparation. For training purpose, suitable persons may be associated with approved experts as 'Team Member'. (kindly refer explanatory notes I dated Oct. 19, 2012 uploaded on QCI website)
  19. Intimation of Changes – In case of any change in the organization related to systems, procedures, laboratory and other facilities, the same shall be intimated to NABET on 6 monthly basis. Such changes shall be audited by NABET in the next surveillance assessment or as deemed fit by the NABET Accreditation Committee.
  20. The ACO shall strictly follow the requirements pertaining to conditions for suspension or cancellation of Accreditation and Code of Conduct (Section 13.3 of the Scheme). NABET may suspend or cancel an accreditation in case of violation of any of the following, but not to be limited to using fraudulent practices by the accredited consultant in respect of its submission/ interaction with NABET which would include deliberate concealment and/ or submission of false or mis-leading information, suppression of information, falsification of records or data, unauthorized use of logo or accreditation, non reporting of completed EIAs to NABET and non-payment of requisite fees.
  21. NCs/ Obs/ Alerts issued after Initial Assessment must be closed within the time frame and as per the guidelines mentioned in Annexure VI. Recurrence of similar NC/ Obs./ Alerts in the next assessment shall make accreditation liable to be cancelled.
  22. Submission of annual fee, as applicable. Failure to pay this fee will be considered as a non-conformance. Payments to be made to NABET by the ACO within one month after receiving invoice, failing which accreditation may be liable to be cancelled.

(Vipin Sahni)  
C.E.O.





Guidelines for addressing Non-Conformances/ Observations

Annexure VI

Sl.No.	Aspect	Guidelines
1.	Non-availability of any of the 5 core functional areas : - AP, WP, SHW not covered by In-house (IH) experts or - SE, EB not covered by IH or covered by empanelled experts	ACO to propose eligible experts for these FAs within three months of NABET letter failing which conditional accreditation of ACO shall stand cancelled.
2.	Development of and conformance to Quality Manual	- Root cause analysis of the shortfall - Corrective and preventive action - Compliance report/closure action to NABET within 3 months of Issuance of NC/ Obs.  A signed undertaking by the Chief Executive Officer/ Authorized signatory of the ACO stating that if the shortfall recurs, the accreditation shall be withdrawn by NABET, to be submitted with reply to NC/ Obs/ Alert.
3.	Field investigation and laboratory work	
4.	Completeness of EIA prepared by Applicant	
5.	Organizational Evaluation (including office facilities)	



**Declaration by Experts contributing to the EIA-----**

I, hereby, certify that I was a part of the EIA team in the following capacity that developed the above EIA.

**EIA Coordinator:**

Name:

Signature & Date:

Period of involvement:

Contact information:

**Functional Area Experts:**

S. No.	Functional Areas	Name of the expert/s	Involvement (Period & Task**)	Signature & Date
1	AP*			
2	WP*			
3	SHW*			
4	SE*			
5	EB*			
6	HG*			
7	GEO*			
8	SC*			
9	AQ*			
10	NV*			
11	LU*			
12	RH*			

\*\*Please attach additional sheet if required

**Declaration by the Head of the Accredited Consultant Organization/ authorized person**

I, \_\_\_\_\_, hereby, confirm that the above mentioned experts prepared the EIA\_\_\_\_\_. I also confirm that the consultant organization shall be fully accountable for any mis-leading information mentioned in this statement.

Signature:

Name:

Designation:

Name of the EIA Consultant Organization:

NABET Certificate No. & Issue Date:



S. No.	Functional Area Code	Complete name of the Functional Areas
1.	AP	Air Pollution Prevention, Monitoring & Control
2.	WP	Water Pollution Prevention, Control & Prediction of impacts
3.	SHW	Solid Waste and Hazardous Waste Management
4.	SE	Socio-Economics
5.	EB	Ecology and Biodiversity
6.	HG	Hydrology, Ground Water & Water Conservation
7.	GEQ	Geology
8.	SC	Soil Conservation
9.	AQ	Meteorology, Air Quality Modeling & Prediction
10.	NV	Noise/ Vibration
11.	LU	Land Use
12.	RH	Risk Assessment & Hazard Management

June 29, 2016

To  
Mr. Pravinbhai P. Sheth  
A/8, Kalindi Apt.,  
Chikuwadi  
Ankleshwar- 393001

**Sub: Environment public hearing of M/s Lewens Labs Pvt. Ltd, Dahej, Dist. Bharuch, Gujarat dtd 29.06.16.**

Dear Mr. Pravinbhai,

We have received your letter addressed to Shri. Hardik Shah Member Secretary, Gujarat Pollution Control Board regarding Environmental Public hearing of Lewens Labs Pvt. Ltd. in this regard we wish to reply your points with following.

**Section A – Appreciations**

Thank you very much for appreciations regarding mentioned positive point in your letter with sr. no.1 to 7.

**Section B - Likely attracted queries**

Point no. 8 - We wish to inform you that Dahej is Notified Industrial Estate developed by GIDC and Notified after 2006 without obtained Environmental clearance. Hence public hearing is required in our case.

Point no.9 - Bulk Drugs Intermediates is part of API and we have calculate overall water consumption and waste water generations to considering both this section. We will incorporate process and mass balance of Bulk drugs intermediate separately in our final EIA report.

Point no.10 -Green Belt criteria of GPCB/CPCB is more strengthen then GIDC norms so better to adhoc GPCB/CPCB criteria for development of Green Belt.

Point no.11 -Green Belt criteria of GPCB/CPCB is more strengthen then GIDC norms so better to adhoc GPCB/CPCB criteria for development of Green Belt. However, this matter is related with policy of GIDC.

Point no.12 - Compatibility study of major hazardous chemical / raw materials are in our considerations while commission of our plants.

Point no.13 – Our many solvents are in tank storage and transport through tanker. We have consider safety procedures of solvent handling in our risk assessment report, which is part of our EIA report.

Point no.14 –Your suggestion is valued suggestions and we will correct water consumption for green belt development in our final EIA report.

Point no. 15 - Distillate waster have high calorific value hence cement industry may use it has fuel in there kiln. Expiry drugs also have calorific value. However, expiry drugs may send for common incineration facility if cement industry are not agreed to use has co-processing.

Point no.16 – As per the OM of MoEF & CC, we can start baseline study parallel to applied for EC. We have applied for TOR on 9<sup>th</sup> March 2015.

Point No.17 – We have carried out Baseline study based on TOR issued by SEAC, Gujarat where has we have plan to monitor CO after commissioning of our plant.

Point no.18 – Source of Benzene may from other units working in the Dahej Industrial estate and also chances to generate from vehicle movement.

Point no.19 – We have generated meteorology data during March 15 to May 15. i.e. one season (summer season) data and same data used for plot of wind rose diagram. This data is generated by staff of our consultant to use their monitoring station near by site.

Point no.20 – We will increase no. of trees for green belt development as per the CPGB guideline.

Point no.21 – Our consultant has their own laboratory approved by MoEF & CC and this laboratory is around 200 KM away from the project side.

Point no.22 – Nitrogen Purging System we will be used if it is suggested by our project consultant.

Point no.23 – We welcome your suggestions and we take care for this.

**Section C – Suggestions to be implemented if found acceptable and economical**

Point no. 24 – Welcome your suggestions and we have given the commitment to celebrate world environment day every year for awareness on environmental protection.

Point no.25 – Welcome your suggestion and try to involve your participations at the time of commission of projects.

Point no.26 – welcome your suggestions and try to give medical assistance to employee's family members.

Point no.27 – We try to spare our part of CSR funds to uplift society weaker class persons like senior citizens, widows, blind persons, orphans, handicapped etc.

Point no.28 - We will take care to disposed of used CFL lamps.

Point no.29 – welcome your valued suggestions and donate some amount to "Gujarat's Beti Bachao and Kanya Kelvani Abhiyan"

Thanking you

Yours faithfully,  
For, **Lewens Labs Pvt. Ltd.**

  
Director

२९ जून, २०१६

श्री विनोद एम. जादव

१/५, नवी वसाहत,

लाहोरी गोडाउन,

भरुच, ३९२००१, गुजरात

विषय: लेवीन्स लेब्स प्राइवेट लिमिटेड की सार्वजनिक पर्यावरण जन सुनवाई दिनांक २९.०६.२०१६

संदर्भ: सदस्य सचिव, जीपीसीबी, गांधीनगर को संबंधित आपका पत्र, दिनांक २९.०६.२०१६

माननीय महोदय श्री,

आपके द्वारा गुजरात प्रदूषण नियंत्रण बोर्ड के सभी सचीव श्री को उदेश करके पात्र लिखा है जिनका जवाब हम नीचे तरीके से देते हैं।

यह इआइए रिपोर्ट सन इन्व्यायारोटेक प्रा. लिमिटेड अमदावाद ने बनाया हुआ है। जिनके पास अपनी खुद की लेबोरेटरी है और इअनाकी लेब को भारत सरकार के वन, पर्यावरण तथा जल वायु परिवर्तन मंत्रालय ने दी हुई है। यह सर्तीफिकेट सेल्फ सर्तीफिकेट कोपी यहाँ आपके सन्दर्भ के लिए सामेल की गई है।

धन्यवाद

लेवीन्स लेब्स प्राइवेट लिमिटेड

डायरेक्टर

29/06/2016

To,  
Vinod M. Jadav,  
1/5, Navi vasaahat,  
Lahori Godown,  
Bharuch - 392001,  
Gujarat

**Sub:** Environmental Public Hearing of Lewens Labs Pvt. Ltd. dated 29/06/2016.

**Ref:** Your letter addressed to the member secretary, GPCB, Gandhinagar, dated 29.06.2016

Respected Sir,

You have written a letter address to member secretary, Gujarat Pollution Control Board. In this regard we try to reply as below.  
This EIA report is prepared by San Envirotech Pvt. Ltd., Ahmedabad. They have their own laboratory approved by MOEF & Climate change, Government of India, New Delhi. Self certified copy of laboratory certificate is enclosed herewith for your ready reference.

Thanking You,

For, **Lewens Labs Pvt. Ltd.**

  
Director





# भारत का राजपत्र

## The Gazette of India

असाधारण

EXTRAORDINARY

भाग II—खण्ड 3—उप-खण्ड (ii)

PART II—Section 3—Sub-section (ii)

प्राधिकार से प्रकाशित

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भारत का राजपत्र : असाधारण


### MINISTRY OF ENVIRONMENT AND FORESTS NOTIFICATION

New Delhi, the 8th April, 2013

**S.O. 945(E).**—In exercise of the powers conferred by clause (b) of sub-section (1) of Section 12 and Section 13 of the Environment (Protection) Act, 1986 (29 of 1986) read with rule 10 of the Environment (Protection) Rules, 1986, the Central Government hereby makes the following further amendments in the notification of the Government of India in the Ministry of Environment and Forests, number S.O. 1174(E), dated the 18<sup>th</sup> July, 2007, namely :-

51	M/s San Envirotech Pvt. Ltd., 324, 401, 402, 423 & 424, Medicine Market Opp. Shefali Centre, Paldi Cross Road, Ahmedabad - 380007. (Gujarat)	(1) Dr. Mahendra R. Sadaria (2) Miss. Diti P. Patel (3) Dr. Khyati Thacker	08.04.2013 to 07.04. 2018"
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Self certified by



Dr. Mahendra Sadaria  
Envirotech Pvt. Ltd.