

**Half Yearly Compliance Report****2025****01 Dec(01 Apr - 30 Sep)****Acknowledgement**

<b>Proposal Name</b>	Proposed project for manufacturing of Speciality Polymer lab with pilot plant facility at plot no 15,16, 21 by 4 at MIDC Morivali Ambernath Dist.Thane		
<b>Name of Entity / Corporate Office</b>	Vishwanath Pai		
<b>Village(s)</b>	Morivali		
<b>District</b>	THANE		
<b>Proposal No.</b>	SEAC 2014 CR 80 TC2	<b>Category</b>	Industrial Projects - 3
<b>Plot / Survey / Khasra No.</b>		<b>Sub-District</b>	Ulhasnagar
<b>State</b>	MAHARASHTRA	<b>Entity's PAN</b>	*****5291P
<b>MoEF File No.</b>	SEAC 2014 CR 80 TC2	<b>Entity name as per PAN</b>	BRILLIANT POLYMERS PRIVATE LIMITED

**Compliance Reporting Details**

<b>Reporting Year</b>	2025
<b>Remarks (if any)</b>	Submitting six monthly 18th post EC Compliance of M/s brilliant Polymers private Limited for the period April 2025 to September 2025.
<b>Reporting Period</b>	01 Dec(01 Apr - 30 Sep)

**Details of Production and Project Area**

**Name of Entity / Corporate Office** Vishwanath Pai

	<b>Project Area as per EC Granted</b>	<b>Actual Project Area in Possession</b>
Private	0.7435	0.7435
Revenue Land	0	0
Forest	0	0
Others	0	0
<b>Total</b>	<b>0.7435</b>	<b>0.7435</b>

**Production Capacity**

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	Polyester Polymers	Tons per Annum (TPA)	30/04/2030	16236 TPA	2196.655 Tonnes for Apr. 25 to Sept. 25 after CIPM	4668 TPA
2	Polyurethane Polymers	Tons per Annum (TPA)	30/04/2030	19980 TPA	17584.42 Tonnes for Apr. 25 to Sept. 25 after CIPM	35592 TPA
3	Polyisocyanate	Tons per Annum (TPA)	30/04/2030	3960 TPA	1448.584 Tonnes for Apr. 25 to Sept. 25 after CIPM	7560 TPA
4	Specialty Polymers	Tons per Annum (TPA)	30/04/2030	5448 TPA	6427.361 Tonnes for Apr. 25 to Sept. 25 after CIPM	13392 TPA

## Conditions

### General Conditions

Sr.No.	Condition Type	Condition Details
1	Human Health Environment	Leq of Noise level shall be maintained as per standards. For people working in the high noise area, requisite personal protective equipment like earplugs etc. shall be provided.
<p><b>PPs Submission:</b> Complied Noise monitoring has been regularly done and reports are enclosed as an Annexure- I. For Employees/ workers who are engaged in the high noise area, requisite personal protective equipment like earplugs / earmuffs etc. are provided. The noise monitoring as carried out at the main gate. The Leq daytime was found 63.8 dB(A) The Leq night time was found 58.9 dB(A) The results are found to be within the CPCB standards stipulated for the industrial area.</p>		Date: 20/11/2025
2	Human Health Environment	The overall noise levels in and around the plant are shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures, etc. on all sources of noise generation. The ambient noise levels shall confirm to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989.
<p><b>PPs Submission:</b> Complied The overall noise levels in and around the plant are well within the standards. Reports for the same are attached as Annexure I Location Day dB Leq Night dB Leq Near Main Gate 63.8 58.9 M.P.C.B. Limit 75.0 70.0</p>		Date: 20/11/2025
3	GREENBELT	Green belt shall be developed and maintained around the plant periphery. Green Belt Development shall be carried out considering CPCB guidelines including selection of plant species and in consultation with the local DFO Agriculture Dept.

<p><b>PPs Submission: Complied</b> A well-developed and properly maintained green belt has been established over an area of 692.4 sq.m, accounting for 43 percent of the total open area. The current sapling survival rate stands at an impressive 96 percent, indicating effective maintenance and care. The green belt will be preserved and sustained throughout the lifespan of the project. Photographic evidence of the green belt has been submitted in previous six monthly EC Compliance for the period October 2024 to March 2025.</p>		<p>Date: 20/11/2025</p>
4	Risk Mitigation and Disaster Management	Adequate safety measures shall be provided to limit the risk zone within the plant boundary, in case of an accident. Leak detection devices shall also be installed at strategic places for early detection and warning.
<p><b>PPs Submission: Complied</b> A comprehensive Risk Analysis and On-site Emergency Plan has been prepared and is periodically updated to ensure readiness for any unforeseen incidents. Smoke detectors, fire extinguishers, fire sirens, and hydrant boxes have been strategically installed throughout the project site to enhance safety measures. Photographs of the installed safety equipment were submitted earlier as part of the previous six-monthly EC Compliance Report. To further strengthen emergency response preparedness, mock drills are conducted at regular intervals. A report of the most recent mock drill is enclosed as Annexure-III.</p>		<p>Date: 20/11/2025</p>
5	Human Health Environment	Occupational health surveillance of the workers shall be done on a regular basis and record maintained as per Factories Act.
<p><b>PPs Submission: Complied</b> As part of the occupational health surveillance program, regular medical check-ups are conducted for all employees and workers. Comprehensive health examinations are carried out every six months to monitor and safeguard their well-being. Form VII is duly maintained in compliance with statutory requirements, and a copy is enclosed as Annexure-IV.</p>		<p>Date: 20/11/2025</p>
6	Risk Mitigation and Disaster Management	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.
<p><b>PPs Submission: Complied</b> All necessary safety measures have been installed at strategic locations across the project site to protect against potential fire hazards associated with the manufacturing process and material handling activities.</p>		<p>Date: 20/11/2025</p>
7	WASTE MANAGEMENT	The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Waste (Management and Handling) Rules, 2003 (amended). Authorization from the MPCB shall be obtained for collections treatment storage disposal of hazardous wastes.
<p><b>PPs Submission: Complied</b> We strictly complying the rules and regulations with regard to handling and disposal of hazardous wastes Annual returns in Form- 4 as required is regularly submitted to MPCB. Annual form IV is submitted on 23-06-2025 on ec mpcb web portal and same is enclose as an Annexure -V.</p>		<p>Date: 20/11/2025</p>
8	WASTE MANAGEMENT	The company shall undertake following Waste Minimization Measures: 1. Metering of quantities of active ingredients to minimize waste. 2. Reuse of by- products from the process as raw materials or as raw material substitutes in other process. 3. Maximizing Recoveries. 4. Use of automated material transfer system to minimize spillage. 5. Use of "Closed Feed" system into batch reactors.
<p><b>PPs Submission: Complied</b></p>		<p>Date:</p>

<p>Company takes following measures to minimize waste as per the requirement: (a) All raw materials are metered and controlled for its quantities to minimize waste. (b) There is no by product generation we refer to processes where the output is purely the intended product, without any waste or secondary materials (c) Recovered solvents are reutilized in processes. (d) Pumps are used to transfer liquids in closed pipelines.</p>		20/11/2025
9	Risk Mitigation and Disaster Management	Regular mock drills for the on-site emergency management plan shall be carried out. Implementation of changes improvements required, if any, in the on-site management plan shall be ensured.
<p><b>PPs Submission:</b> Complied The Mock drills are being conducted on various emergency scenario taking in consideration. Mock drills are being conducted on quarterly basis. The mock drill conducted dated 01.03.2025 is enclosed as an Annexure-III The safety audit carried out by external expert in December 2023 which has been submitted as an Annexure in previous EC Compliance report of October 2023 to March 2024. The internal safety audit has been also conducted in the month of January 2025. The Report of Internal safety audit is enclosed as an Annexure-XI</p>		Date: 20/11/2025
10	Human Health Environment	A separate environment management cell with qualified staff shall be set up for implementation of the stipulated environmental safeguards.
<p><b>PPs Submission:</b> Complied The organogram of the Environmental Management Cell has been enclosed as an Annexure - VI.</p>		Date: 20/11/2025
11	WASTE MANAGEMENT	Transportation of ash will be through closed containers and all measures should be taken to prevent spilling of the ash.
<p><b>PPs Submission:</b> Complied Yes, Complied</p>		Date: 20/11/2025
12	WASTE MANAGEMENT	Separate silos will be provided for collecting and storing bottom ash and fly ash.
<p><b>PPs Submission:</b> Complied Coal ash is stored in designated pits constructed with impervious concrete flooring to prevent any potential contamination of soil and groundwater. Photographs of the storage facility was submitted in the previous report.</p>		Date: 20/11/2025
13	Human Health Environment	Separate funds shall be allocated for implementation of environmental protection measures EMP along with item-wise breaks- up. These costs shall be included as part of the project cost. The funds earmarked for the environment protection measures shall not be diverted for other purposes and year-wise expenditure should reported to the MPCB and this department.
<p><b>PPs Submission:</b> Complied Total recurring EMP cost- For the period 2025-2026 is Rs. 1291471/- Capital cost: 3,86,50,734/- The item wise allocation for the Environment Management plan is enclosed as an Annexure-VII. We promise that funds earmarked for the environment protection measures shall not be diverted for other purposes.</p>		Date: 20/11/2025
14	MISCELLANEOUS	The project management shall advertise at least in two local newspapers widely circulated in the region around the project, one of which shall be in the Marathi language of the local concerned within seven days of issue of this letter, informing that the project has been accorded environmental clearance and copies of clearance letter are available with the Maharashtra Pollution Control Board and may also be seen at Website at <a href="http://cc.maharashtra.gov.in">http://cc.maharashtra.gov.in</a>

<p><b>PPs Submission:</b> Complied</p> <p>The advertisement regarding the obtained Environmental Clearance was published in newspapers on 18th April 2015. It appeared in The Free Press Journal and Nava Shakti, a local newspaper in Mumbai.</p>		<p>Date: 20/11/2025</p>
15	Statutory compliance	Project management should submit half yearly compliance reports in respect of the stipulated prior environment clearance terms and conditions in hard and soft copies to the MPCB and this department, on 1st June and 1st December of each calendar year.
<p><b>PPs Submission:</b> Complied</p> <p>This is 18 th half yearly report. We regularly submit the EC Compliance Report in respect of the stipulated prior environment clearance terms and conditions soft copies to MoEFCC, Regional Directorate CPCB, RO and SRO MPCB. and in hard copies to RO and SRO MPCB. The acknowledgement of Parivesh portal and email transmittals to regulatory authorities are enclosed as an Annexure-VIII.</p>		<p>Date: 20/11/2025</p>
16	Statutory compliance	A copy of the clearance letter shall be sent by proponent to the concerned Municipal Corporation and the local NGO, if any, from whom suggestions representations, if any, were received while processing the proposal. The clearance letter shall also be put on the website of the Company by the proponent.
<p><b>PPs Submission:</b> Complied</p> <p>The environment clearance letter is already uploaded on company website. Screenshot of the same is enclosed as an Annexure- IX. <a href="https://brilliantpolymers.com/con-quality/">https://brilliantpolymers.com/con-quality/</a></p>		<p>Date: 20/11/2025</p>
17	Statutory compliance	No additional land shall be used 'or acquired for any activity of the project without obtaining proper permission.
<p><b>PPs Submission:</b> Complied</p> <p>The project is being developed within a Notified Industrial Area, and no additional land is required. The industry affirms that no extra land has been or will be utilized for any activity without obtaining the necessary statutory approvals.</p>		<p>Date: 20/11/2025</p>
18	AIR QUALITY MONITORING AND PRESERVATION	For controlling fugitive natural dust, regular sprinkling of water and wind shields at appropriate distances in vulnerable areas of the plant shall be ensured.
<p><b>PPs Submission:</b> Complied</p> <p>Effective dust emission control measures were actively implemented during the construction phase, including regular water sprinkling to suppress airborne dust particles. These practices have been continued during the operational phase to control natural dust emissions and ensure the maintenance of ambient air quality.</p>		<p>Date: 20/11/2025</p>
19	AIR QUALITY MONITORING AND PRESERVATION	Regular monitoring of the air quality, including SPM and SO <sub>2</sub> levels both in work zone and ambient air shall be carried out in and around the power plant and records shall be maintained. The location of monitoring stations and frequency of monitoring shall be decided in consultation with Maharashtra Pollution Control Board (MPCB) and submit report accordingly to MPCB.
<p><b>PPs Submission:</b> Complied</p> <p>Ambient Air monitoring and Work place monitoring is being carried regularly at our manufacturing unit. The ambient air quality monitoring is being carried out at the one location every month. The range of ambient air quality results are as under: PM 10: 53.48 microgram/m<sup>3</sup> PM 2.5: 23.24 microgram/m<sup>3</sup> SO<sub>2</sub> conc: 09.14 microgram/m<sup>3</sup> NO<sub>x</sub> Conc: 16.75 microgram/m<sup>3</sup> The ambient air quality results were found to be within the respective stipulated limits of NAAQS 2009. The reports of ambient air monitoring are enclosed as an Annexure - I.</p>		<p>Date: 20/11/2025</p>

20	Risk Mitigation and Disaster Management	Necessary arrangement shall be made to adequate safety and ventilation arrangement in furnace area.
<p><b>PPs Submission: Complied</b>  Robust safety infrastructure has been established across the factory premises, with systems strategically positioned throughout the project site to ensure the protection of personnel and to mitigate the risk and consequences of fire-related incidents. The furnace area is fully equipped with essential safety and ventilation systems. Fire hydrants, hose reels, fire sirens, and smoke detectors have been installed at critical locations to facilitate early detection and prompt emergency response. All safety equipment and systems undergo regular inspection, maintenance, and testing to ensure their optimal performance and reliability during emergencies. To enhance safety awareness, informative display boards have been installed across the facility for the guidance of both workers and visitors. Photographic documentation of these safety measures has already been submitted as part of the previous six-monthly EC Compliance reports.</p>		Date: 20/11/2025
21	Human Health Environment	Proper House-keeping programs shall be implemented.
<p><b>PPs Submission: Complied</b>  A regular housekeeping program is implemented to maintain a clean and safe workplace environment. A SOP has been developed for housekeeping activities, and records are systematically maintained. The SOP, housekeeping schedule, along with supporting photographs, are enclosed as Annexure-II.</p>		Date: 20/11/2025
22	Risk Mitigation and Disaster Management	In the event of the failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.
<p><b>PPs Submission: Being Complied</b>  All the Pollution Control System are operated and maintained well but in case of any emergencies, Industry will put off the unit and will not restart the unit until the desired efficiency has been achieved.</p>		Date: 20/11/2025
23	AIR QUALITY MONITORING AND PRESERVATION	A stack of adequate height based on DG set capacity shall be provided for control and dispersion of pollutant from DG set.(If applicable)
<p><b>PPs Submission: Complied</b>  DG set of 900 KVA is already provided with stack of adequate height. Monitoring report of DG set are attached as Annexure I.</p>		Date: 20/11/2025
24	WATER QUALITY MONITORING AND PRESERVATION	A detailed scheme for rainwater harvesting shall be prepared and implemented to recharge ground water.
<p><b>PPs Submission: Complied</b>  Two rainwater harvesting tanks, each with a capacity of 12.5 m3, have been constructed, providing a combined storage capacity of 25 m3 Any excess rainwater beyond this capacity is efficiently diverted to storm water drainage channels aligned with the natural topography. The harvested rainwater is utilized for groundwater recharge. Photographic evidence of the rainwater harvesting system was previously submitted as an annexure to the Environmental Clearance (EC) Compliance Report for the period of October 2023 to March 2024.</p>		Date: 20/11/2025
25	WATER QUALITY MONITORING AND PRESERVATION	Arrangement shall be made that effluent and storm water does not get mixed.
<p><b>PPs Submission: Complied</b>  Separate Storm water drains are provided as per natural slope. Effluent and storm water does not get mixed.</p>		Date: 20/11/2025

26	WATER QUALITY MONITORING AND PRESERVATION	Periodic monitoring of ground water shall be undertaken and results analyzed to ascertain any change in the quality of water. Results shall be regularly submitted to the Maharashtra Pollution Control Board.
<b>PPs Submission:</b> Complied There is no permission to Bore wells as project is in notified MIDC Area. Fresh water Supply is from MIDC.		Date: 20/11/2025
27	Statutory compliance	The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of (-PCB and the SPC'B. The criteria pollutant levels namely; SPM, RSPM. SO2, NOx (ambient levels as well as stack emissions) or critical sector parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
<b>PPs Submission:</b> Complied EC compliance report along with monitoring reports are already updated on Company website, screenshot of the same are enclosed as an Annexure-IX. The actual monitoring reports are being displayed on Notice board of the company.		Date: 20/11/2025
28	Statutory compliance	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated A'-2C conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB.
<b>PPs Submission:</b> Being Complied Being done regularly.		Date: 20/11/2025
29	Statutory compliance	The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall as it should be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the respective Regional Offices of MoEF by e-mail.
<b>PPs Submission:</b> Complied The environmental statement for the financial year ending 31st March 2025 in Form-V has been submitted by the us to the Maharashtra State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently. Environment Statement in Form V is submitted on 05-09-2025 on the ec mpcb web portal and attached to EC Compliance report which is displayed on Company website the same is enclosed in the aforesaid Annexure -X.		Date: 20/11/2025
30	Statutory compliance	The environmental clearance is being issued without prejudice to the court case pending in the court of law and it does not mean that project proponent has not violated any environmental laws in the past and whatever decision of the Hon'ble court will be binding on the project proponent. Hence this clearance does not give immunity to the project proponent in the case filed against him.
<b>PPs Submission:</b> Complied There is no litigation pending against the project.		Date: 20/11/2025
31	Statutory compliance	The Environment department reserves the right to add any stringent

		condition or to revoke the clearance if conditions stipulated are not implemented to the satisfaction of the department or for that matter, for any other administrative reason.
<b>PPs Submission:</b> Agreed to Comply Noted and Agreed.		Date: 20/11/2025
32	Statutory compliance	Validity of Environment Clearance: The environmental clearance accorded shall be valid for period of 5 years to start of production operations.
<b>PPs Submission:</b> Agreed to Comply Noted and Agreed.		Date: 20/11/2025
33	Statutory compliance	In case of any deviation or alteration in the project proposed from those submitted to this department for clearance, a fresh reference should be made to the department to assess the adequacy of the condition(s) imposed and to incorporate additional environmental protection measures required, if any.
<b>PPs Submission:</b> Agreed to Comply Noted and Agreed.		Date: 20/11/2025
34	Statutory compliance	The above stipulations would be enforced among others under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and rules there under, Hazardous Wastes (Management and Handling) Rules, 1989 and its amendments, the public Liability Insurance Act, 1991 and its amendments.
<b>PPs Submission:</b> Complied Noted and Agreed. PLI Copy is enclosed as an Annexure-XII		Date: 20/11/2025
35	Statutory compliance	Any appeal against this Environment clearance shall lie with the National Green Tribunal (Western Zone Bench, Pune), New Administrative Building, 1stFloor, D-, Wing, Opposite Council Hall, Pune, if preferred, within 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
<b>PPs Submission:</b> Agreed to Comply Noted and Agreed.		Date: 20/11/2025
<b>Visit Remarks</b>		
<b>Last Site Visit Report Date:</b>		N/A
<b>Additional Remarks:</b>		No Visit from Regional officer MoEF and CC. We have grant of renewal of Consent with Change in Product Mix on dated 30.06.2025 The Consent is enclosed as an Additional attachment.
<b>Note:</b> This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.		