Action Taken Report in the Original Application No: 128/2025(WZ) of Hon'ble National Green Tribunal (NGT), Western Zone Bench (WZ), Pune

[As per Order of Hon'ble National Green Tribunal, Western Zone Bench, Pune dated 11/11/2025 in O. A. No. 128/2025(WZ)]

Submitted by:

Gujarat Pollution Control Board

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (NGT), WESTERN ZONE BENCH (WZ), PUNE

Original Application No: 128/2025

In the matter of:

Aditya Singh Chauhan (Applicant)

Vs

GPCB & Ors. (Respondent)

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(Dr. S. N. AGRAVAT)
UNIT HEAD BHARUCH

1. Back ground of the matter

This Original Application No. **128/2025(WZ) "Aditya Singh Chauhan Vs. GPCB & Ors."** is registered before the Hon'ble NGT Western Zone Bench, Pune with the prayers that an Expert Committee be constituted to investigate the problem improper treatment and disposal of industrial effluent in Gujarat of Industrial Development Corporation (Saykha GIDC) Estate, Bharuch, Gujarat, to determine its causes, extent of damage caused and recommend measures for restoration of the quality of the soil and groundwater and pass an order awarding damages against respondent No. 6- M/s. Sejal Chem tech Industries, respondent No. 7- M/s. Shlokka Dyes Private Ltd., respondent No.8- Aries Colour Chem Pvt. Ltd., respondent No-9 M/s. Sky Intermediates and respondent No.10- M/s. Horbex medicines for causing damage to the environment by them.

Hon'ble National Green Tribunal (NGT) Western Zone Bench, Pune vide order dated 11/11/2025 in OA No.128/2025 is directed At this stage, five industries, which have been impleaded in this application have been still operating despite closure directions, we deem it appropriate to call for the report from respondent No.1 – GPCB as to what action has been taken against these industries and whether they are still operating at the site in question. Let a report in this regard be submitted by respondent No.1 – GPCB within one month.

The order of Hon'ble National Green Tribunal (NGT) dated 11/11/2025 in OA No: 128/2025 (WZ) is included as **Annexure-1.**

2. Past Legal history (Last three year) of respondent nos. 6 to 10:

Sr. No.	Name of the Unit	Action Taken by GPCB in last three years
1	M/s Horbex Medicines (PCB ID-87890)	• Show cause Notice issued on dated 28/05/2025, 16/12/2025 & 09/01/2026
2	M/s Sky Intermediates (PCB ID-80461)	• Notice of Direction issued on dated 22/10/2024, 07/01/2025 & 08/01/2026 • Closure Direction issued on dated 07/01/2025 and Trial run revocation issued on dated 21/03/2025
3	M/s Shlokka Dyes Pvt. Ltd. (PCB ID-84022)	• Show cause Notice issued on dated 31/07/2023, 12/12/2024, 13/08/2025, 14/12/2025 & 09/01/2026 • Notice of Direction issued on dated

		30/03/2024 • Closure Direction issued on dated 23/07/2024 & 09/01/2026 and Trial run revocation issued on dated 22/08/2024 & 20/05/2025
4	M/s Sejal Chem Tech Industries (PCB ID-75544)	• Show cause Notice issued on dated 25/03/2022, 21/11/2024 & 09/01/2026 • Notice of Direction issued on dated 18/03/2025
5	M/s Aries Colour Chem Pvt. Ltd. (PCB ID-65170)	• Show cause Notice issued on dated 04/05/2023, 27/09/2023, 21/11/2024, 22/11/2025, 28/10/2025 & 09/01/2026 • Notice of Direction issued on dated 12/09/2022 • Direction issued on dated 03/07/2024 & Trial run revocation issued on dated 03/07/2024 • Legal notice issued on dated 18/07/2023 • Closure Direction issued on dated 03/05/2023, Trial run revocation issued on dated 06/07/2023 & 27/09/2024 & Permanent Revocation issued on dated 28/07/2025 • Closure Direction issued on dated 30/08/2024 & Trial run revocation issued on dated 27/09/2024
6	M/s. CETP Saykha (PCB ID-71763	• Show cause Notice issued on dated 25/03/2022, 15/02/2024& 04/08/2025 • Notice of Direction issued on dated 16/04/2025, 18/10/2025 & 28/01/2026

- Since, as per above details no any industry (respondent nos. 6 to 10) is operated without revocation of the Board.

3. Site Observation:

GPCB, Regional Office-Bharuch has carried out inspections of 1) M/s Horbex Medicines (PCB ID-87890) 2) M/s Sky Intermediates (PCB ID-80461) 3) M/s Shlokka Dyes Pvt. Ltd. (PCB ID-84022) 4) M/s Sejal Chem Tech Industries (PCB ID-75544) 5) M/s Aries Colour Chem Pvt. Ltd. (PCB ID-65170) 6) M/s. CETP Saykha (PCB ID-71763) on dtd. 18/12/2025.

Inspection Report (IR) of the site inspection of each industry inspected on dated 18/12/2025 are included as **Annexure-2.**

4. Action taken on basis of Inspection report dated 18/12/2025 is as under:

Sr. No	Industry Name & PCB ID	Inspection Date	Action taken	Annexure
1	M/s Horbex Medicines (PCB ID-87890)	18/12/2025	• Show cause notice issued on dated 09/01/2026	**Annexure-3**
2	M/s Sky Intermediates (PCB ID-80461)	18/12/2025	• Notice of direction u/s 33(A) of the Water Act-1974 issued on dated 08/01/2026	**Annexure-4**
3	M/s Shlokka Dyes Pvt. Ltd. (PCB ID-84022)	18/12/2025	• Closure Direction with 15 days effect u/s 33(A) of the Water Act-1974 issued on dated 09/01/2026 • Also Show cause notice issued on dated 09/01/2026 • Trial Revocation issued on 23/01/2026 for three Months	**Annexure-5, 6 & 7**
4	M/s Sejal Chem Tech Industries (PCB ID-75544)	18/12/2025	• Show cause notice issued on dated 09/01/2026	**Annexure-8**
5	M/s Aries Colour Chem Pvt. Ltd. (PCB ID-65170)	18/12/2025	• Show cause notice issued on dated 09/01/2026	**Annexure-9**
6	M/s. CETP Saykha (PCB ID-71763)	18/12/2025	• Notice of direction u/s 33(A) of the Water Act-1974 issued on dated 08/01/2026	**Annexure-10**

5. Conclusion

In compliance, GPCB issued Show Cause Notices, Notice of Directions and Closure Directions to respond nos. 6 to 10 over time to time based on non-compliances observed. The Regional Office, GPCB, Bharuch has instructed to keep watch on non compile units.

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Item No.4 (Pune Bench)

BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE

[THROUGH PHYSICAL HEARING (WITH HYBRID OPTION)]

ORIGINAL APPLICATION NO.128 OF 2025 (WZ)

Aditya Singh Chauhan .... **Applicant**

Versus

GPCB & Ors. .... **Respondents**

Date of hearing : 11.11.2025

CORAM: HON'BLE MR. JUSTICE DINESH KUMAR SINGH, JUDICIAL MEMBER
HON'BLE MR. SUDHIR KUMAR CHATURVEDI, EXPERT MEMBER

Applicant : Mr. Ajit Kumar Singh, Advocate

Respondents : Ms. Manavi Damle, Advocate holding for Mr. Maulik Nanavati, Advocate for R-1/GPCB

ORDER

1. This Original Application has been preferred by the applicant with the prayers that an Expert Committee be constituted to investigate the problem of improper treatment and disposal of industrial effluent in Gujarat Industrial Development Corporation (Saykha GIDC) Estate, Bharuch, Gujarat, to determine its causes, extent of damage caused and recommend measures for restoration of the quality of the soil and groundwater and pass an order awarding damages against respondent Nos.6 to 10 for causing damage to the environment by them.

2. The submission made by the learned counsel for the applicant is that respondent No. 6 – M/s Sejal Chem Tech Industries, respondent No.7 – M/s Shlokka Dyes Private Ltd., respondent No. 8 – M/s Aries Colour Chem Pvt.

Ltd., Respondent No.9 – M/s Sky Intermediates and respondent No.10 – M/s Horbax Medicines have been issued closure directions by respondent No.3 – GPCB, copies of which are also annexed with the memo of application, on account of the violations, which are noticed in the said notices. But despite these closure directions, these industries – respondent Nos.6 to 10 are still operating and causing pollution at the site in question. Learned counsel has also drawn our attention to Annexure-A1, which is a news item published in Divya Bhaskar dated 05.07.2025, about suspicious death of four cattle in Saykha and two bodies are recovered.

3. Learned counsel further states that not only respondent Nos.6 to 10, but other industries have also caused pollution at the site in question, which needs to be checked and stopped and the damages need to be awarded for which investigation should be ordered to be carried out by the Expert Committee.

4. At this stage, five industries, which have been impleaded in this application have been still operating despite closure directions, we deem it appropriate to call for the report from respondent No.1 – GPCB as to what action has been taken against these industries and whether they are still operating at the site in question. Let a report in this regard be submitted by respondent No.1 – GPCB within one month.

5. We, at this stage, direct the Registry to issue notice only against respondent No.1 – GPCB, returnable within four weeks. Since today learned counsel Ms. Manavi Damle, holding brief of Mr. Maulik Nanavati, learned counsel for respondent No.1 – GPCB has appeared and states that her presence may be noted and waives service of notice upon respondent No.1 - GPCB, we direct her to file the report within four weeks, as directed above.

6. Put up this matter for hearing on admission, after receipt of the report from respondent No.1 – GPCB, on 23.12.2025.

Dinesh Kumar Singh, JM

Sudhir Kumar Chaturvedi, EM

November 11, 2025
ORIGINAL APPLICATION NO.128 OF 2025 (WZ)
npj

[redacted]

Inspection Report

1. General Information of the Industry:		
1.1	Name & Address	M/s. Horbex Medicines (PCB ID – 87890) Plot No. C-236, GIDC Industrial Estate, Saykha, Taluka: Vagra, District: Bharuch.
1.2	Category & Scale (as per CPCB categorization)	Red – Small (R111.1-I: Organic chemicals including halogenated hydrocarbons (using solid/liquid fuel))
1.3	Contact Person & Contact Numbers with email id	Mr. Nishantbhai Patel (Partner) (Mob: 9426807376) horbexmicrocell@gmail.com
1.4	Year of Establishment	2023
1.5	CC&A Validity	Consent No. AWH-143541 date of issue : 12/06/2025 valid up to 07/01/2030
1.6	Operational Condition	Operational
1.7	Present Manufacturing Products	⇒ During inspection, manufacturing activity is found not in operation, unit is engaged in the manufacturing of Micro Crystalline Cellulose Powder.
1.8	Main Raw Materials of present manufacturing product	⇒ Wood pulp & HCl.
1.9	Closure Directions issued by GPCB in past years wrt wastewater and hazardous waste management.	None
1.10	Display Board at main entry gate	Physical display Board is not provided.
2. Wastewater Management		
2.1	Quantity of Fresh Water consumption and its source	**A. Source:** GIDC **B. Based on past 03 months billing record:** Based on past 03 months' data (GIDC bill) provided by industry the average fresh water consumption is 9.81 kld. Sep'25 – 30.0 kl Oct'25 – 397.0 kl Nov'25 – 466.0 kl **C. As per CC&A:** Total water consumption 40.0 kld (Dom: 2.0 kld, Gardening: 1.0 kld, Ind: 37.0 kld)
2.2	Wastewater segregation with specification of criteria of such segregation (if any)	Unit has only one stream.
2.3	Provision of storage of segregated stream with capacity, permanent provision of flow meter, piping etc.	Unit has provided effluent collection tank (27 KL) as a part of ETP and treated wastewater holding tank (10 KL) as a part of ETP units. So unit is instructed to provide separate dedicated emergency effluent storage tank as per consent condition.

<table>
<tr><td></td><td></td><td>Flow meter is provided by the industry and during visit its reading noted (totalizer): 968966.0 lit, return line flow meter in case of parameter exceed reading noted; 161.7 lit.</td></tr>
<tr><td>2.4</td><td>Total Wastewater generation

(based on wastewater stream segregation such as high COD, low COD etc.)</td><td>A. Based on past 03 months' record:
During visit, unit has not furnished effluent discharge data. Later on following data are submitted;

<table><tr><td>Sep'25</td><td>69.77 kl</td></tr><tr><td>Oct'25</td><td>165.22 kl</td></tr><tr><td>Nov'25</td><td>170 kl</td></tr></table>
B. As per CC&A:
Total wastewater generation is 11.5 kld (Dom: 1.5 kld, Ind: 10.0 kld)
⇒ Generated 10 KLD industrial wastewater shall be treated in ETP and treated industrial wastewater shall be disposed to CETP Saykha for further treatment and disposal.
⇒ 1.5 KLD Domestic waste water shall be disposed of through septic tank/Soak pit system.</td></tr>
<tr><td>2.5</td><td>Wastewater treatment process with capacity and operational status</td><td><u>For industrial wastewater</u>
The industry has provided ETP comprising of primary, secondary treatment system as bellows:
Collection tank (27 KL)→ Primary Treatment tank (27KL) with chemical dosing system→ Nutch filter → intermediate collection tank (02 Nos. 5.0 KL each)→ aeration tank (Secondary Treatment tank) (27 KL) → Secondary settling tank (lamella)(5KL)→ Final discharge Tank (10 kl)→ CETP Saykha through GIDC pipeline network

⇒ During inspection, ETP units are found not in operation except aeration tank.
⇒ During inspection, construction work of additional ETP tanks is found under construction stage, so written instruction is given for the same.
⇒ During visit, two water samples are collected from ETP inlet (collection tank) and ETP outlet (treated w/w holding tank) for analysis purpose.
⇒ Treated wastewater is being discharged in to CETP Saykha through above ground pipeline (recently done) though GIDC sub-pumping station S-4C and PS-4. During visit, discharge is not observed.
⇒ Unit is not maintaining the record for logbook of ETP operation, so written instruction is given for the same.

<u>For domestic wastewater</u>
⇒ 1.5 KLD domestic wastewater is disposed of through septic tank/soak pit system.</td></tr>
</table>

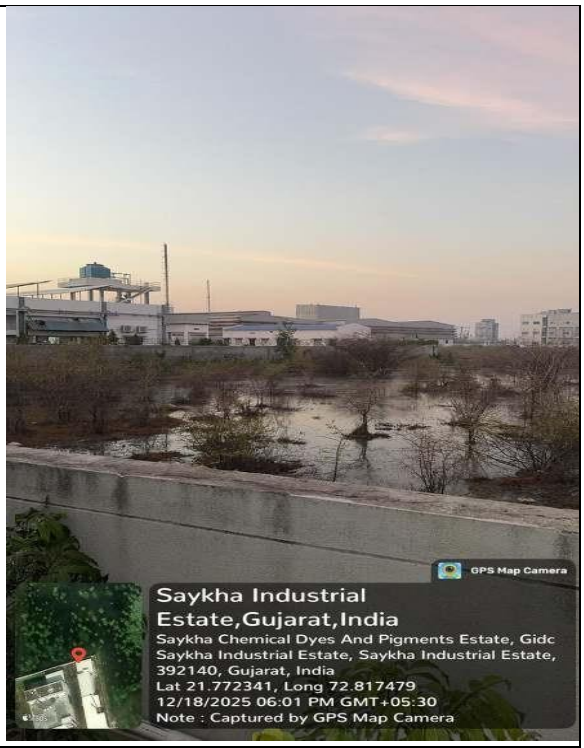
2.6	On site Record keeping	Records for the operation of ETP is not maintaining, so written instruction is given for same.
2.7	Provision of any intermittent storage/guard pond etc. before disposal	Presently, unit has provided 27 KL collection tank and 10 KL treated wastewater holding tank. Unit is instructed to provide emergency effluent storage tank as per consent condition.
2.8	Mode of disposal of wastewater (GIDC drain, CETP, ZLD, gardening direct)	⇒ Industrial effluent→ETP (P+S)→ CETP Saykha ⇒ Domestic wastewater → septic tank/Soak pit system.
2.9	Provision for flow meters at MEE feed, MEE condensate, RO etc. or any critical locations as per Consent	⇒ Unit has provided Flow meter at final outlet of ETP and reading noted: 968966.0 lit and return line flow meter in case of parameter exceed reading noted; 161.7 lit. ⇒ Unit has not provided flow meter at inlet line of ETP, so written instruction is given from the same.
2.10	OCEMS/PTZ/Flowmeter provision, location of OCEMS, parameters monitored, working principle, its online connectivity to CPCB/GPCB server	⇒ Unit has provided online analyzer for TOC, pH, COD, TSS which is found not in operation during inspection as no discharge found. ⇒ Unit has not provided flow meter at inlet line of ETP, so written instruction is given from the same.
2.11	Any bypass/ponding/accumulation of wastewater inside or outside the premises observed	⇒ During visit, no live discharge observed from this unit to outside premises. ⇒ During visit, it is observed that contaminated water ponding observed on open GIDC plot adjacent to boundary wall. Unit is asked to clarify the same. However, one water sample is collected from the same accumulated wastewater ponding for fingerprint analysis.
3. Air emission management		
3.1	Flue gas emission details with APCM	⇒ Unit has provided one Bio Coal/Briquette fired boiler (1.5 TPH) connected with MDC and bag filter followed by stack. During inspection it is found not in operation.
3.2	Process gas emission details with APCM	⇒ Unit has provided one FBD in close loop, which is also found not in operation.
3.3	Any non-compliance observed under Air Act	None
4. Hazardous waste management		
4.1	Hazardous waste generation and disposal system	⇒ Unit has not furnished hazardous waste generation - disposal details during inspection. ⇒ During inspection, stock of ETP sludge @ 460 kg in provided covered storage area.
4.2	Dedicated hazardous waste storage area with leachate collection system	Provided
4.3	Membership certificate of common hazardous waste facility	Unit has obtained membership of BEIL infrastructure ltd for disposal of landfill waste 1 MT/year (in exiting consent 2 MT/ year).
4.4	Non-compliance observed under Hazardous waste management	TSDF membership is found less than consented quantity.

5. Other Observations
⇒ Unit has not furnished production and relevant technical details of A/W/H during visit. ⇒ Photographs taken during inspection are attached here with for reference.

6. Written instructions given during inspection
1. □□□□□ □□□□□ □□□□□ □□□□□□□ Hon'ble NGT OA No. 128 of 2025 (WZ) dated-11/11/2025 □□□ specific reference □□□ □□□□□□□ □□□□. 2. ETP inlet □□ flow meter □□□□□□. 3. ETP operation □□□□□□ logbook □□□□□ □□□□□′ □□□□□□□. 4. □□□□□□□ □□□□ ETP □□□□□□□□ construction □□ □□□□□□□ □□□′□□ □□□□□□ □□ □□□□□ □□□S□□ □□□ETP □□□□ additional □□□ (tank) □□□□□ □G□ □□ □□ □□□ □□□ □□□□-□□ □□□′□□ □□ □□□□. 5. Treated effluent □□□ Emergency storage □□□□ adequate storage facility □□ S□□□ □□ □□□□. 6. □□□□ □□ □□□□□□□□ 5□□C□□, □□-□□□□□□□, □□□□ □□□□□, □□□□□□□ □□□□□□-□□□□□□, fuel □□ Hazardous waste generation-disposal □□ □□□□□ □□□□□□□ □□□□ □□□ □□□□ □ □□□ □□□□-□□ □□□′□□ □□□ □□□□. 7. □□□□□ □□□□ □□□ □□□□□□□ GIDC □□□ open plot □□□ contaminated water □□ □□□□□ □□□□□ □□□ □□□□ □□ □□ □□□□ □□9□□ □□□□.

Photographs taken during inspection

ETP area of the unit

	
Construction activity observed going on in ETP for additional tank	Contaminated water found accumulated in open plot located back and sadjacent of the unit

Date of Visit : **18/12/2025**

Name of Visiting Officials with designation :

M.M.Khimsuriya	B.A. Bhuva	R.K.Mehta	S.S.Valvi
(AEE)	**(AEE)**	**(SO)**	**(SO)**

Inspection Report

<table>
<tr><th colspan="3">1. General Information of the Industry:</th></tr>
<tr><td>1.1</td><td>Name & Address</td><td>M/s. Sky Intermediate (PCB ID – 80461)
Plot No. C-133, Saykha Industrial Estate, Taluka: Vagra, District: Bharuch.</td></tr>
<tr><td>1.2</td><td>Category & Scale
(as per CPCB categorization)</td><td>Red – Medium
(R42.1-I: Dyes, Dye Intermediates and Pigments produced by chemical synthesis)</td></tr>
<tr><td>1.3</td><td>Contact Person & Contact Numbers with email id</td><td>Mr. Lalchand Yadav (Production Manager)
(Mob: 8758191249)
skyintermediate@gmail.com</td></tr>
<tr><td>1.4</td><td>Year of Establishment</td><td>2021</td></tr>
<tr><td>1.5</td><td>CC&A Validity</td><td>Consent No. AWH-147795 date of issue: 26/08/2025 valid up to 17/02/2030</td></tr>
<tr><td>1.6</td><td>Operational Condition</td><td>Operational</td></tr>
<tr><td>1.7</td><td>Present Manufacturing Products</td><td>H-Acid</td></tr>
<tr><td>1.8</td><td>Main Raw Materials of present manufacturing product</td><td>Naphthalene, Sulphuric acid, Oleum, Nitric Acid, LSP, Glauber Salt, CI Powder, Soda Ash, Caustic Flakes, Methanol, Spent H_2SO_4 (30-35%)</td></tr>
<tr><td>1.9</td><td>Closure Directions issued by GPCB in past years wrt wastewater and hazardous waste management.</td><td>
<table>
<tr><td>Direction Act</td><td>Direction issue date</td><td>Direction effect</td><td>Revocation issue date</td></tr>
<tr><td>Water Act</td><td>07/01/2025</td><td>Immediate effect</td><td>21/03/2025 for 3 months</td></tr>
</table>
</td></tr>
<tr><td>1.10</td><td>Display Board at main entry gate</td><td>Physical display Board is not provided.
Digital display Board as per CPCB guideline is not provided.</td></tr>
<tr><th colspan="3">2. Wastewater Management</th></tr>
<tr><td>2.1</td><td>Quantity of Fresh Water consumption and its source</td><td>A. Source: GIDC
B. Based on past 03 months billing record:
Based on past 03 months' data (GIDC bill) provided by industry the average fresh water consumption is 61.21 kld.
<table>
<tr><td>Sep'25</td><td>1091 kl</td></tr>
<tr><td>Oct'25</td><td>2446 kl</td></tr>
<tr><td>Nov'25</td><td>2034 kl</td></tr>
</table>
C. As per CC&A:
Total water consumption 87 kld (Dom: 5.0 kld, Gardening: 5.0 kld, Ind: 77.0 kld)</td></tr>
<tr><td>2.2</td><td>Wastewater segregation with specification of criteria of such segregation (if any)</td><td>Unit has two stream segregation for high concentration stream (Process & scrubber) is treated in to in house MEE and low COD stream (Boiler condensate, cooling) is treated in ETP and MEE to achieve ZLD.</td></tr>
<tr><td>2.3</td><td>Provision of storage of segregated stream with capacity, permanent provision of flow meter, piping etc.</td><td>⇒ Unit has provided total three no of HDPE tank for storage of effluent (30 KL, 2 x 40 KL).
⇒ Unti has provided floe meter at ETP inlet (before filter press), SD feed, MEE condensate line.
⇒ Unit has not provided flow meter in re-use line of ETP.</td></tr>
</table>

<table>
<tr><td>2.4</td><td>Total Wastewater generation

(based on wastewater stream segregation such as high COD, low COD etc.)</td><td>A. Based on past 03 months' record:
Unit has not furnished wastewater generation details during inspection, lates on submitted data is as follow:
<table><tr><td>Sep'25</td><td>467 kl</td></tr><tr><td>Oct'25</td><td>742 kl</td></tr><tr><td>Nov'25</td><td>742 kl</td></tr></table>
B. As per CC&A:
Total wastewater generation is 70 kld (Dom: 4.0 kld, Ind: 66 kld)
⇒ Generated 66 KLD of industrial waste water (Process 44 KLD + Scrubber 1.5 KLD + washing 10.0 KLD) shall be treated in ETP and treated industrial wastewater shall be sent to in house MEE and Spray dryer for further treatment.
⇒ 1.5 KLD Scrubbing media (SBS) is reused within the premises or sale to actual users having Rule-9 permission under HOWM Rules-2016 after making MOU.
⇒ Remaining 10 KLD industrial wastewater (5 KLD boiler condensate & 5 KLD of cooling condensate) shall be reused within premises.</td></tr>
<tr><td>2.5</td><td>Wastewater treatment process with capacity and operational status</td><td><u>For industrial wastewater</u>
The industry has provided ETP comprising of primary units and in house MEE + Spray Dryer system (capacity mentioned below is as informed during visit) is bellows:

Collection tank (40 KL 02 Nos)→Neutralization tank: (27 KL 1 Nos)→Filter Nutch- 01 Nos (48 *48)-→Holding tank (40 kl 01 Nos)-→MEE feed tank: (40 KL 02 no's)→MEE (48 kld)→Spray Dryer (Cap: 48 KL)→MEE slurry tank (40 KL 01 Nos)→Condensate tank (50 KL 01 no)
⇒ During inspection the ETP units, MEE & SD was found in operation.
⇒ Two water samples are collected from ETP inlet (Collection tank), From MEE Condensate tank for analysis purpose.
⇒ Unit has installed under capacity MEE (48 kld) against 66 kld wastewater generation as per consent condition. Unit is instructed to clarify the same.

<u>For domestic wastewater</u>
4.0 KLD domestic wastewater is disposed into septic tank/soak pit system.</td></tr>
<tr><td>2.6</td><td>On site Record keeping</td><td>Proper records for the operation of ETP, MEE, SD is not maintaining, so written instruction is given for same</td></tr>
<tr><td>2.7</td><td>Provision of any intermittent storage/guard pond etc. before disposal</td><td>During inspection, Collection tank (35 KL 02 Nos) for collection for treated wastewater.</td></tr>
<tr><td>2.8</td><td>Mode of disposal of</td><td>ZLD through ETP, MEE & SD</td></tr>
</table>

	wastewater (GIDC drain, CETP, ZLD, gardening direct)	
2.9	Provision for flow meters at MEE feed, MEE condensate, RO etc. or any critical locations as per Consent	⇒ Flow meter reading (totalizer) noted; ETP inlet before filter press - 791.9 m^3, SD feed – 8457341.7 lit, MEE condensate – 9427514.6 lit.
2.10	OCEMS/PTZ/Flowmeter provision, location of OCEMS, parameters monitored, working principle, its online connectivity to CPCB/GPCB server	⇒ Not applicable for OCMS as fall under small scale industry. Flow meter details are mentioned in above sections.
2.11	Any bypass/ponding/accumulation of wastewater inside or outside the premises observed	⇒ During visit, it is observed that contaminated water ponding (total area @ 4800 sq.mt, @ 1.5 to 2 ft uneven depth) on GIDC open plot adjacent to boundary wall of the unit. However, one water sample is collected from the same pond for fingerprint analysis. ⇒ During visit, no live discharge observed from this unit to outside premises.
3. Air emission management		
3.1	Flue gas emission details with APCM	⇒ Unit has installed coal/agro briquettes fired Boiler with Bag filter + water scrubber as an APCM. ⇒ Unit has installed a LDO fired TFH. Unit has provided a common stack of Boiler & TFH. ⇒ Unit has provided a briquettes/Coal fired HAG and spray dryer with Water scrubber as an APCM. ⇒ Unit has provided cyclone separator with stack attached to HAG. During inspection, Boiler, HAG and Spray dryer are found in operation along with APCMs. ⇒ Unit has provided a D.G. set as stand by.
3.2	Process gas emission details with APCM	⇒ Unit has provided a reaction vessel (VS plant) with two stage water scrubber+ alkali scrubber, a reaction vessel (H Acid) with two stage alkali scrubber and a reaction vessel of H Acid plant with two stage alkali scrubber as an APCM. ⇒ During inspection, manufacturing of H Acid is observed going on. ⇒ Unit has provided 2 nos. of SFD with inbuilt cyclone and bag filter as an APCM which was not found in operation at the time of inspection. ⇒ Generated scrubbing solution spent HCl & SBS (35%) will reuse by unit in process and other scrubbing solution will be treated in ETP along with Low COD/TDS w/w.
3.3	Any non-compliance observed under Air Act	⇒ Leakages/ spillage observed in scrubber re-circulation tank. And housekeeping in scrubber are need to improve.
4. Hazardous waste management		
4.1	Hazardous waste generation and disposal system	⇒ Unit has not submitted details of last three-month hazardous waste generation-disposal details during inspection. Later on submitted data, unit has disposed

		total gypsum sludge – 1763.09 MT, Iron sludge – 431.88 MT, ETP sludge/MEE/spray dryer salt – 952.21 MT in duration of Sep'25 to Nov'25. ⇒ During visit, stock of gypsum sludge @ 200 MT, iron sludge @ 60 MT, MEE salt@ 2 MT, spray dryer salt @ 80 MT found stored in storage area.
4.2	Dedicated hazardous waste storage area with leachate collection system	Provided
4.3	Membership certificate of common hazardous waste facility	⇒ Unit has obtained membership of TSDF sites i.e. BEIL infrastructure Ltd. & Shesh Enviro Infra Pvt Ltd.
4.4	Non-compliance observed under Hazardous waste management	⇒ Pump connected with leachate collection pit provided in hazardous waste storage area is found under maintenance.

5. Other Observations

⇒ All over housekeeping in manufacturing plant area, ETP area, scrubber area, hazardous waste storage area are found poor due to leakages/ spillages which need to improve.

⇒ Unit need to provide nomenclature and flow sheet diagram showing ETP each unit capacity and over all design capacity which is not furnished with evidence.

⇒ Unit has not provided internal SWD, however provided two nos. of collection pit near main gate and gate no.2 behind boiler area and bund wall to prevent run off outside the premises at main gate as well as near manufacturing plant area.

⇒ Unit has not furnished production and relevant technical details of A/W/H during visit.

⇒ Photographs taken during inspection are attached here with for reference.

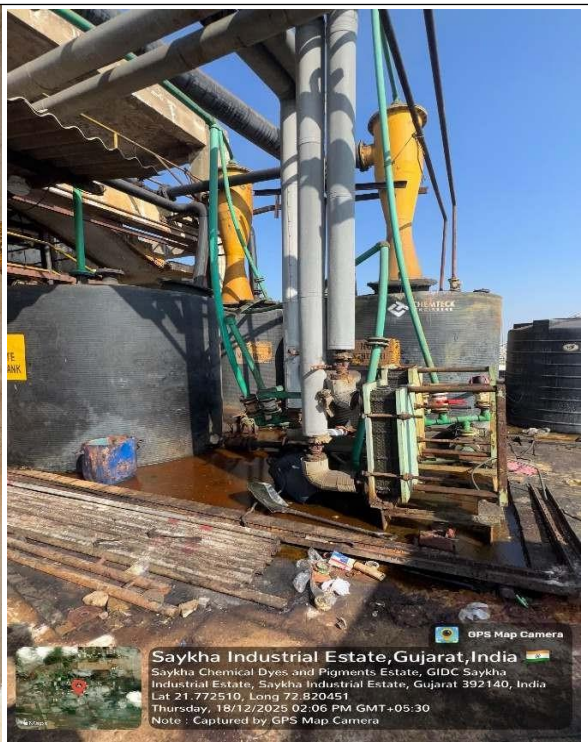
6. Written instructions given during inspection

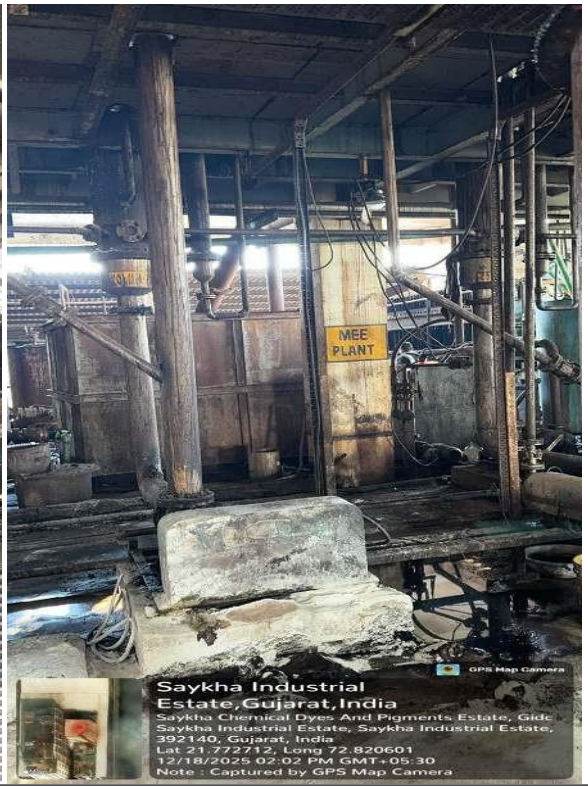
1. □□□□□□ □□□□ manufacturing plant □□, ETP □□ □□, scrubber □□ □□, Hazardous w storage □□ □□□□□ □□□□□ □3□□□□ leakages / spillage □□□□ □□□□ □□□ □□□□ all ar Housekeeping □□ □□□□ □□□□ □□, □□c□□□□□ R□□□□□c□□ □□□□ □□□□ pumps / pipeline network □□□ regular maintenance □□□□K□□.
2. Hazardous waste storage □□ □□□□□ spillage collection pit □□□□ □□□□□□ pump □□□□ □□ □□□□ □□□□□ □□□□□ □□□'□□ □□□□.
3. ETP, production □□□ data □□□` record maintain □□` □□ □□□¬□ proper details maintain □□□□□ □□ □□□ □□□` printed logbook □□□□□ daily basis □□ w/w treated-disposal, production all data □□ □□` □□ □ □□ record maintain □□□□. scrubber □□□` logbook □□□□□□ □□□.
4. □□□□□□ □□□□ □□□□□ East direction □□□` 80m x 60m (uneven depth @ 1.5 to 2 ft.) □□□ Q□– □□ plot □□ contaminated water □□□□□□□□□□ □□□□ □□□□. /□□ Q□□□□□□□□□.
5. Emergency situation □□□ effluent □□□ storage □□□` □□□□□□ 40KL □□ □□ tank □□`□ □□ □□□ □□ □□□` □0□ facility □□ '□□2□□ □□□□. □□□□□ □□□'□□ ™ □□□□ MEE (48 KLD) install □□`□ □□. under capacity □□ /□□ Q□□□□□□□□□.

6. □□-□□ t□ □t□□□□□□ □□□8□□, □□-□□ □ □□, □□□□ □□□□□, □□2□□□□□ □□□□4 □ 2□□□□/□ :□□, fuel □□□□□, Hazardous waste generation-disposal □□ □□□□□ □□□□□□□ □;□ □□`□ □ □□□ □□□□-□□ □□□'□□ □;□ □□□□.

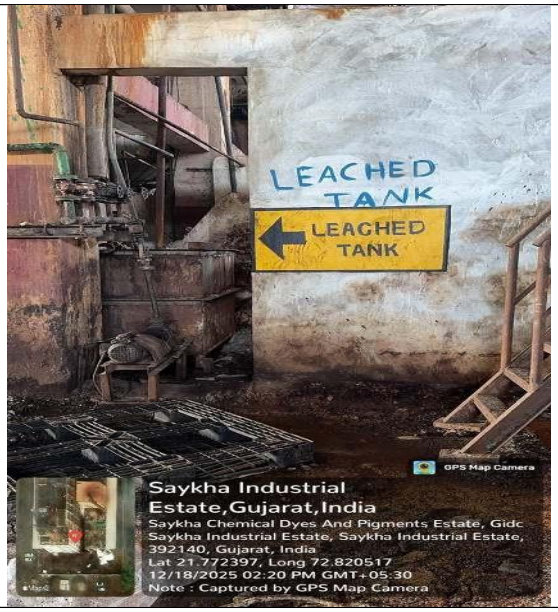
7. □□□□□ □□□□□ □□□□□ □□□□□□ Hon'ble NGT OA No. 128 of 2025 (WZ) dated-11/11/2025 □□□ specific reference □□□ □□□□□□□ □□□□.

Photographs taken during inspection

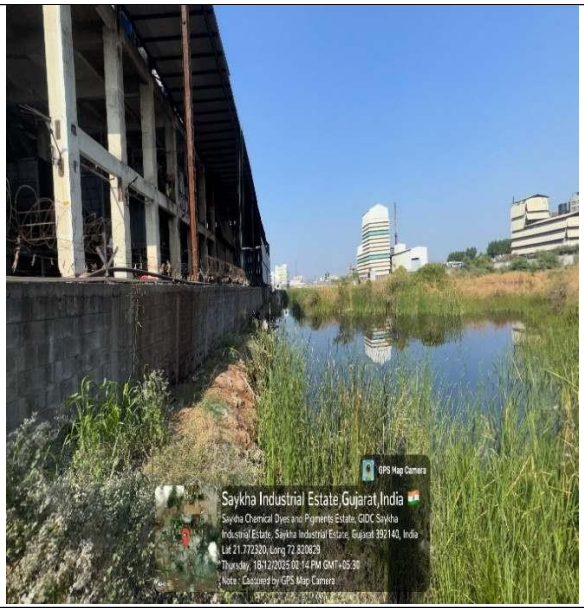




Leakages/ Spillages are found in Plant premises and in production plant, ETP/MEE area, scrubber area

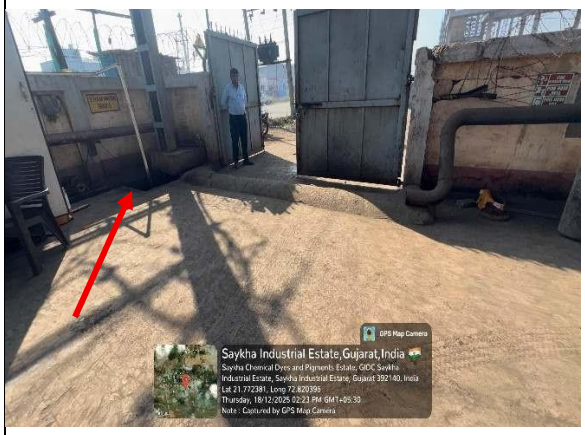


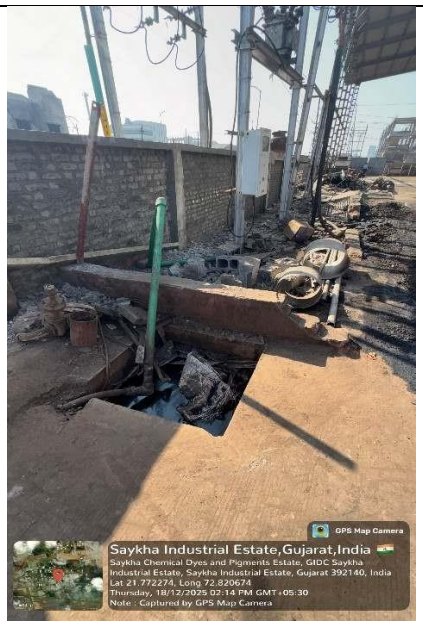
Pump provided in leachate collection tank was found non operational



Contaminated water found accumulated in open plot located at adjacent to unit in East direction.

Gypsum, iron sludge stored in Hazardous waste storage area.





Collection pit provided near main gate and gate no.2

Date of Visit : **18/12/2025**

Name of Visiting Officials with designation :

M.M.Khimsuriya	**B.A. Bhuva**	**R.K.Mehta**	**S.S.Valvi**
(AEE)	**(AEE)**	**(SO)**	**(SO)**

Inspection Report

<table>
<tr><td colspan="3">1. General Information of the Industry:</td></tr>
<tr><td>1.1</td><td>Name & Address</td><td>M/s. Shlokka Dyes Pvt. Ltd. (PCB ID – 84022)
Plot No. C/54, GIDC Saykha, Taluka: Vagra, District: Bharuch.</td></tr>
<tr><td>1.2</td><td>Category & Scale
(as per CPCB categorization)</td><td>Red – Small
(R42.1-I: Dyes, Dye Intermediates and Pigments produced by chemical synthesis)</td></tr>
<tr><td>1.3</td><td>Contact Person & Contact Numbers with email id</td><td>Mr. Gopalbhai Panariya (Lab-Chemist)
(Mob: 9712916199)
sales@equinoximpex.com</td></tr>
<tr><td>1.4</td><td>Year of Establishment</td><td>2022</td></tr>
<tr><td>1.5</td><td>CC&A Validity</td><td>Consent No. AWH-128084 date of issue: 31/07/2023 valid up to 18/05/2028</td></tr>
<tr><td>1.6</td><td>Operational Condition</td><td>Operational</td></tr>
<tr><td>1.7</td><td>Present Manufacturing Products</td><td>During inspection, coupling stage of product Black B 165% is going on (reactive dyes).</td></tr>
<tr><td>1.8</td><td>Main Raw Materials of present manufacturing product</td><td>As details furnished, VS, H-acid, sodium nitrite, Ocatanol, sulphamic acid, ice</td></tr>
<tr><td>1.9</td><td>Closure Directions issued by GPCB in past years wrt wastewater and hazardous waste management.</td><td>
<table>
<tr><td>Direction Act</td><td>Direction issue date</td><td>Direction effect</td><td>Revocation issue date</td></tr>
<tr><td>Water Act</td><td>23/07/2024</td><td>Immediate effect</td><td>22/08/2024 for 3 month
20/50/2025 for 3 month</td></tr>
</table>
</td></tr>
<tr><td>1.10</td><td>Display Board at main entry gate</td><td>Not provided</td></tr>
<tr><td colspan="3">2. Wastewater Management</td></tr>
<tr><td>2.1</td><td>Quantity of Fresh Water consumption and its source</td><td>Source: GIDC
⇒ Unit has not furnished GIDC water bill for fresh water consumption. Hence, details are not verified during visit.
As per CC&A:
Total water consumption 64.5 kld (Dom: 2 kld, gardening: 1.5 kld, Ind: 61 kld)</td></tr>
<tr><td>2.2</td><td>Wastewater segregation with specification of criteria of such segregation (if any)</td><td>Not applicable as no high COD w/w generated as per consent conditions.</td></tr>
<tr><td>2.3</td><td>Provision of storage of segregated stream with capacity, permanent provision of flow meter, piping etc.</td><td>⇒ Unit has provided effluent collection tank 15 KL (HDPE) and treated wastewater holding tank 50 KL (HDPE).
⇒ Unit has provided flow meter at final outlet line of ETP.</td></tr>
<tr><td>2.4</td><td>Total Wastewater generation

(based on wastewater stream segregation such as high COD, low COD etc.)</td><td>⇒ Unit has not furnished effluent generation and disposal details during inspection hence details are not verified.

As per CC&A:
Total wastewater generation is 21.5 kld (Dom: 1.5 kld, Ind: 20 kld)</td></tr>
</table>

		(a) Generated industrial effluent shall be treated in to ETP and discharged in to CETP Saykha for further treatment and disposal. (b) Generated domestic wastewater shall be treated in to STP and treated sewage shall be reused in gardening within premises.
2.5	Wastewater treatment process with capacity and operational status	**For industrial wastewater** Unit has provided primary ETP units mentioned below for treatment of industrial effluent: **Collection tank in mfg plant→ ETP - Collection cum neutralization tank (15 KL, MS)→filter press(24"x24")→ treated wastewater holding tank (50 KL, MS)** ⇒ During visit, provided ETP units are found not in operation. ⇒ Two water samples are collected from ETP inlet (collection tank) and ETP outlet (treated w/w holding tank) for analysis purpose. ⇒ Unit has not provided flow meter at ETP inlet. ⇒ Flexible pipeline observed in ETP area connected to pump and details not furnished for the same. ⇒ Unit has not provided sampling point in ETP. ⇒ leakages/ spilled wastewater found in ETP area. **For domestic wastewater** ⇒ Unit has provided STP for treatment of domestic wastewater. During visit, provided STP are found in idle condition and looking to its condition is seems that it was not operated since long. Unit is asked to clarify the same and instructed to do corrective measures.
2.6	On site Record keeping	⇒ Unit is not maintained logbook for the operation of ETP, STP.
2.7	Provision of any intermittent storage/guard pond etc. before disposal	Unit has provided 50 KL treated effluent holding cum discharge tank which is inadequate storage capacity as per consent condition no. 3.6 (AWH-128084 dated 31/07/2023).
2.8	Mode of disposal of wastewater (GIDC drain, CETP, ZLD, gardening direct)	⇒ Industrial effluent→CETP Saykha after primary treatment in ETP through GIDC pipeline network. Unit has obtained GIDC drainage release certificate for disposal of 20 kld wastewater to GIDC pipeline network. ⇒ Domestic wastewater→ As per consent condition domestic wastewater shall be treated in to STP as per condition no. 3.3 (b) which is found not in operation and in idle condition.
2.9	Provision for flow meters at MEE feed, MEE condensate, RO etc. or any critical locations as per Consent	⇒ Flow meter is provided at ETP outlet but record is not maintained. ⇒ Unit has not provided flow meter at ETP inlet.
2.10	OCEMS/PTZ/Flowmeter provision, location of OCEMS, parameters monitored, working principle, its online	⇒ Unit has provided online TOC meter at ETP final outlet line but not working during inspection. ⇒ Online analyser connectivity with GPCB/CPCP server is not done.

	connectivity to CPCB/GPCB server	
2.11	Any bypass/ponding/accumulation of wastewater inside or outside the premises observed	⇒ Yes, live discharge of untreated wastewater is observed from unit premises and going outside on open GIDC plot/ land. Details mentioned in general observation part.
3. Air emission management		
3.1	Flue gas emission details with APCM	⇒ Unit has provided coal fired boiler connected to MDC, bag filter and water scrubber followed by stack and coal fired Hot air generator provided with MDC, bag filter followed by stack, not provided alkali scrubber with HAG as per consent condition. ⇒ During visit, both boiler and HAG are found not in operation.
3.2	Process gas emission details with APCM	⇒ Unit has provided spray dryer for product drying connected with wet scrubber followed by stack which is found not in operation during inspection.
3.3	Any non-compliance observed under Air Act	⇒ Coal is stored openly and also spread outside premise behind boiler area where gate is not provided and directly open to GIDC road. For that unit need to provide gate behind boiler area and proper coal storage area. Unit need to improve housekeeping in that portion.
4. Hazardous waste management		
4.1	Hazardous waste generation and disposal system	⇒ Unit has provided hazardous waste storage area near ETP units and also stored hazardous waste in one portion of production plant.
4.2	Dedicated hazardous waste storage area with leachate collection system	Provided but unit needs to check its adequacy in terms of generation quantity on day-to-day basis.
4.3	Membership certificate of common hazardous waste facility	Unit has obtained BEIL TSDF NOC for dispose of 30 MTA landfilling hazardous waste
4.4	**Non-compliance observed under Hazardous waste management**	
	Contaminated bags/liners/ carboys/barrels are found stored hap-hazard manner in covered shed in one portion of production plant and some quantity also in hazardous waste storage area besides ETP which is found full and some portion is lying down outside the shed. Unit need to dispose it as per consent condition on regular basis and provide adequate hazardous waste storage area.	
5. Other Observations		
⇒ During inspection, behind boiler area live discharge of untreated wastewater (dark blue colored) flow falling from roof top (drain provided for rain water disposal in roof top) which is directly enter in to GIDC kachha SWD drain outside the premises and going towards south direction (after GIDC road crossing) in to open GIDC plot/ land and spread up to 250 m area where dark blue colored wastewater ponding/ puddle observed (approx. area of w/w puddle is @ 12000 sq.mt having @ 0.5 to 1 ft uneven depth) and also top soil is found contaminated. Upon asking and verified, this wastewater is generated from washing activity of SFD feed tank. Hence, unit is discharging untreated washing wastewater without any treatment to directly GIDC open kachha drain and plot/ land and violates consent condition instead taking it to ETP. Looking to site condition inside and outside premises it seems that unit may regularly discharge this washing wastewater to outside premises.		

⇒ Unit is instructed to immediately stops this illegal wastewater disposal and recollect all going wastewater along with top soil.

⇒ unit has not provided storm water drain (SWD) within premises. One collection pit is provided near main gate for collection of contaminated run off/ emergency spillage but fix pipeline up to ETP and pump facility is not provided this pit.

⇒ Earlier Board had issued closure direction under the Water Act on 23/07/2024 for contaminated water ponding outside premises near main gate where presently found dry area during visit (photograph attached).

⇒ Unit has not furnished production and relevant technical details of A/W/H during visit.

⇒ Photographs taken during inspection are attached here with for reference.

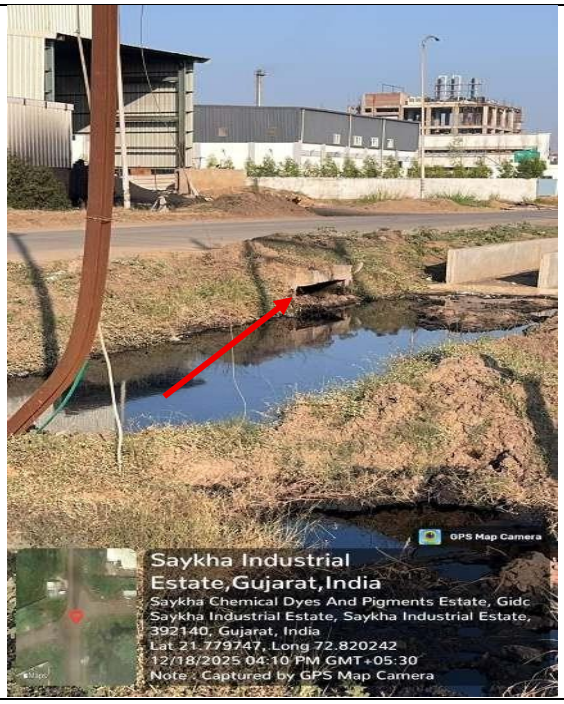
6. Written instructions given during inspection

1. [illegible] Hon'ble NGT OA No. 128 of 2025 (WZ) dated-11/11/2025 [illegible] specific reference [illegible].
2. ETP inlet [illegible] flow meter [illegible]. ETP [illegible] flexible pipeline [illegible]. [illegible] operation [illegible] proper record maintain [illegible], Printed logbook [illegible].
3. [illegible] contaminated bags liners haphazardly shed [illegible] store [illegible]. [illegible] Adequate dedicated Hazardous waste storage [illegible].
4. SWD [illegible]. [illegible] SWD collection pit [illegible] [illegible] fix pump, [illegible] up to ETP [illegible].
5. [illegible] display board [illegible].
6. STP [illegible] idle condition [illegible].
7. ETP outlet line [illegible] online analyzer TOC [illegible].
8. [illegible].
9. SFD feed tank [illegible] washing [illegible] dark blue color contaminated w/w without any treatment [illegible] SWD [illegible] (live discharge) [illegible] road [illegible] GIDC open plot [illegible] 250m [illegible] spread [illegible] open ponding/puddle [illegible] open plot [illegible] contaminated [illegible]. [illegible] illegal w/w discharge [illegible] consent condition [illegible].

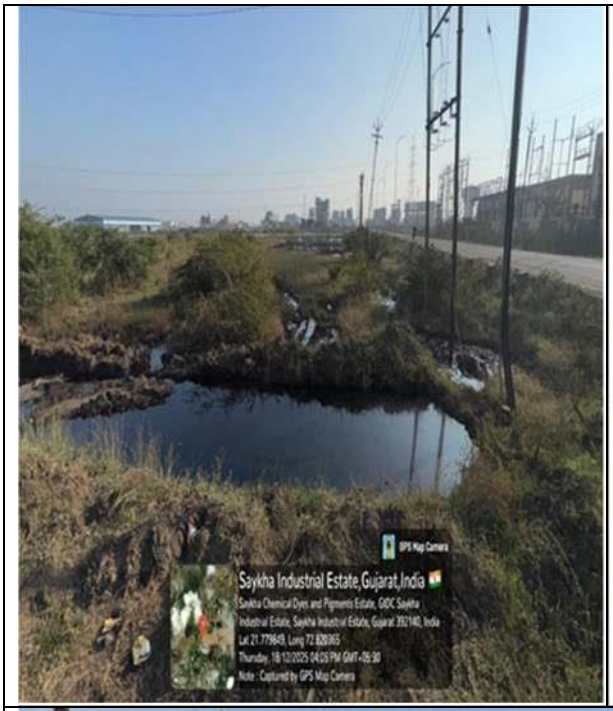
Photographs taken during inspection

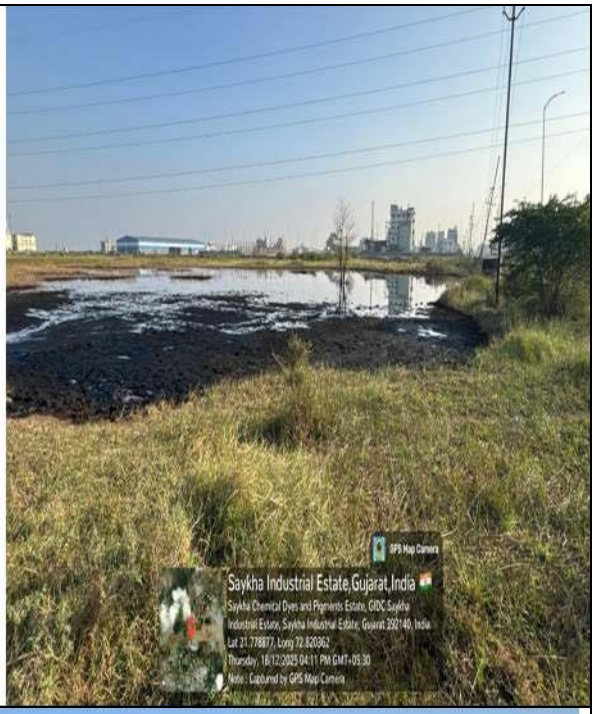
SFD feed tank from which dark blue coloured washing wastewater generated which was going outside premises through live discharged

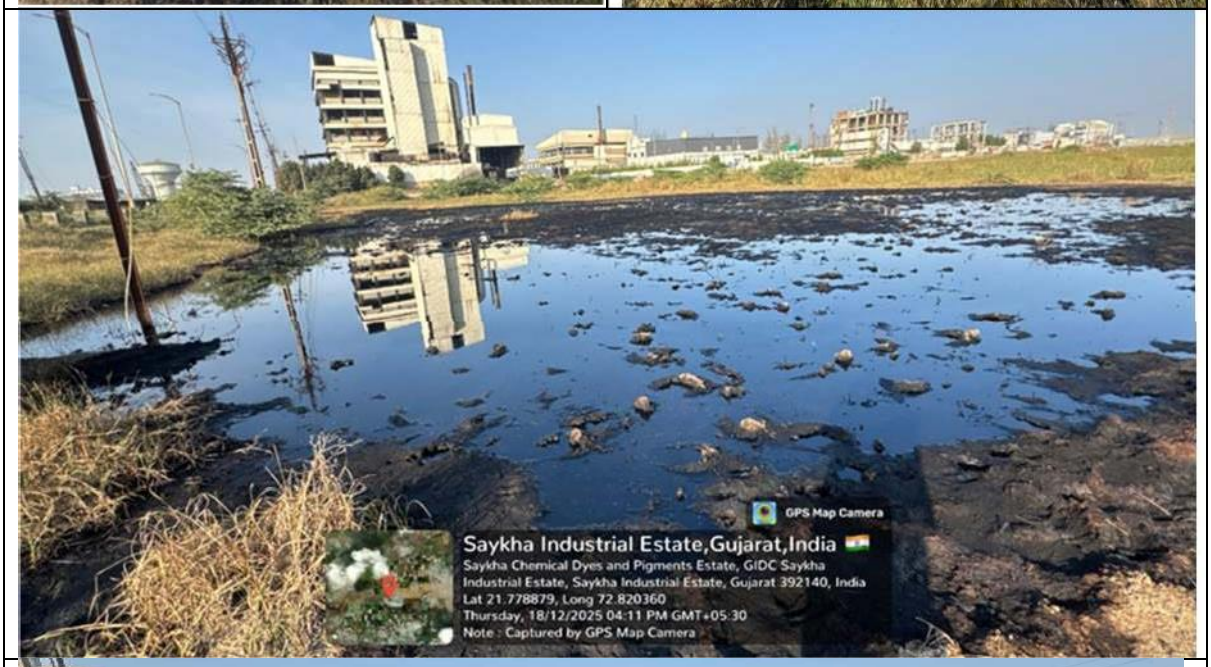
Live discharge of dark blue coloured wastewater by free fall from roof top drain provided in shed

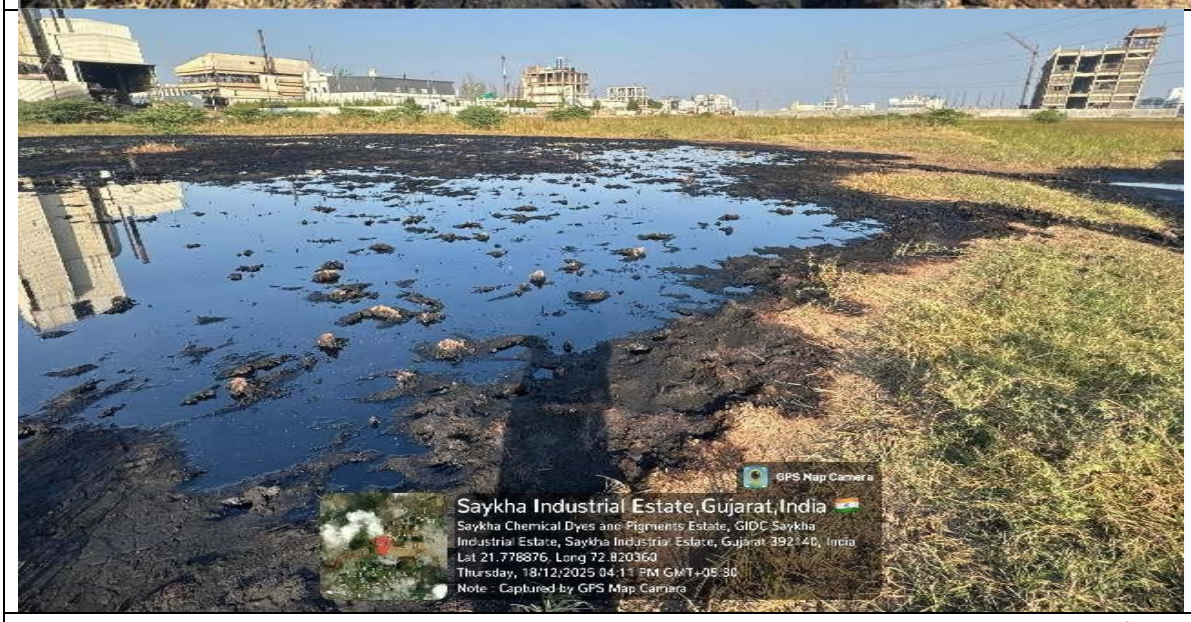


Live discharge of dark blue coloured wastewater by free fall from roof top drain provided in shed is going to GIDC kachha SWD adjacent to boundary of the unit which is further leading towards South direction of open GIDC plot/land through road crossing

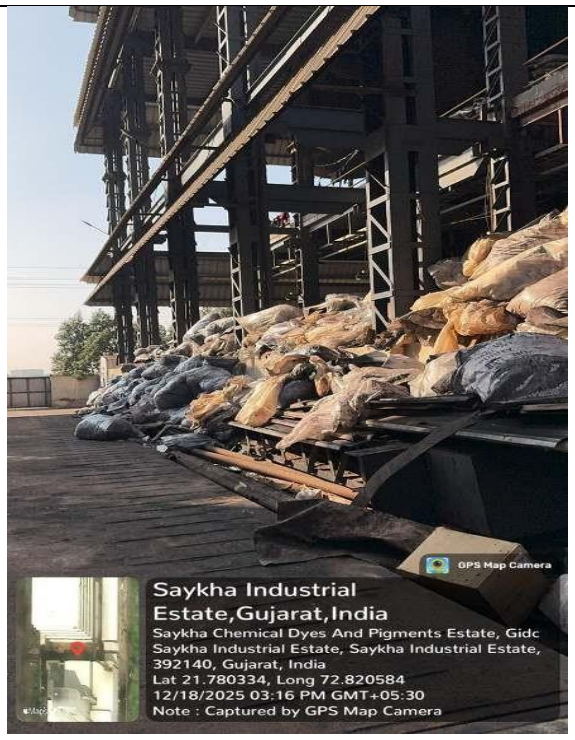




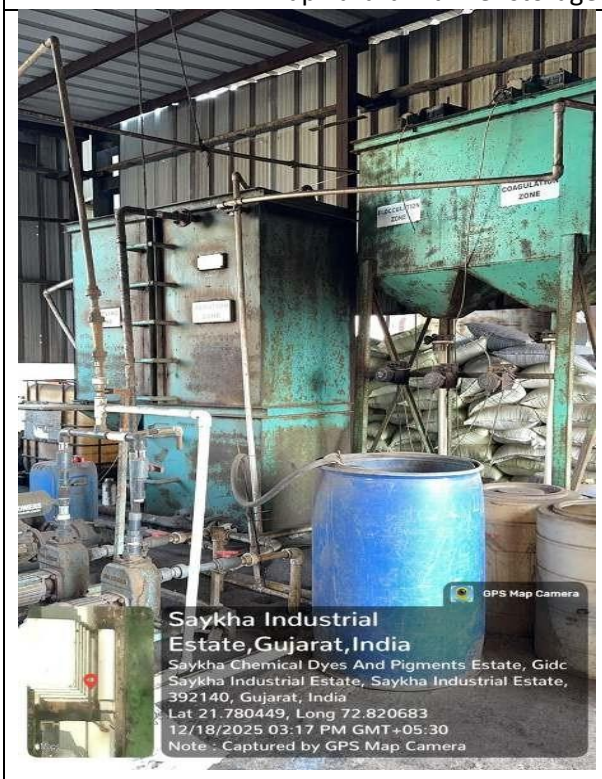




Accumulated dark blue coloured wastewater in open GIDC plot located at South direction of the unit and top soil is also found contaminated up to 250 m strech



Hap hazard manner storage of contaminated bags/ liners



Unit has provided STP for treatment of domestic wastewater was found in idle conditions.	Storm water collection pit is provided near main gate of the unit but not provided fixed pipeline and pump up to ETP.

Date of Visit : **18/12/2025**

Name of Visiting Officials with designation :

M.M.Khimsuriya	**B.A. Bhuva**	**R.K.Mehta**	**S.S.Valvi**
(AEE)	**(AEE)**	**(SO)**	**(SO)**

Inspection Report

<table>
<tr><td colspan="3">1. General Information of the Industry:</td></tr>
<tr><td>1.1</td><td>Name&Address</td><td>M/s. Sejal Chem Tech Industries (PCB ID – 75544)
Plot No. C-154, Sayakha Industrial Estate, Taluka:Vagra, District: Bharuch.</td></tr>
<tr><td>1.2</td><td>Category & Scale
(as per CPCB categorization)</td><td>Red – Small
(R18.4-I: Chlorine, fluorine, bromine, iodine, and their compounds)</td></tr>
<tr><td>1.3</td><td>Contact Person & Contact Numbers with email id</td><td>Mr. Hiteshbhai Diyora (Partner)
(Mob: 9825113329)
sejalchemtech154@yahoo.com</td></tr>
<tr><td>1.4</td><td>Year of Establishment</td><td>2020</td></tr>
<tr><td>1.5</td><td>CC&A Validity</td><td>Consent No. AWH-137966 date of issue :27/06/2022 valid up to 17/10/2026</td></tr>
<tr><td>1.6</td><td>Operational Condition</td><td>Operational</td></tr>
<tr><td>1.7</td><td>Present Manufacturing Products</td><td>During visit the industry was manufacturing following products:
• Bromine Recovery</td></tr>
<tr><td>1.8</td><td>Main Raw Materials of present manufacturing product</td><td>• Bromide solution, Chlorine, HCL, Caustic</td></tr>
<tr><td>1.9</td><td>Closure Directions issued by GPCB in past years wrt wastewater and hazardous waste management.</td><td>None</td></tr>
<tr><td>1.10</td><td>Display Board at main entry gate</td><td>Physical display Board is provided.</td></tr>
<tr><td colspan="3">2. Wastewater Management</td></tr>
<tr><td>2.1</td><td>Quantity of Fresh Water consumption and its source</td><td>A. Source: GIDC
B. Based on past 03 months billing record:
Based on past 03 months data (GIDC bill) provided by industry the average fresh water consumption is 39.83 kld.
<table><tr><td>Sep’25</td><td>1160 kl</td></tr><tr><td>Oct’25</td><td>1198 kl</td></tr><tr><td>Nov’25</td><td>1267 kl</td></tr></table>
C. As per CC&A:
Total water consumption 69 kld (Dom: 6.0 kld, Gardening: - 4.70 kld, Ind: 58.30 kld)</td></tr>
<tr><td>2.2</td><td>Wastewater segregation with specification of criteria of such segregation (if any)</td><td>Generated wastewater is being treated in primary ETP, MEE (Cap. 25 KLD), MVR (60 KLD) and RO (cap.40 KLD).</td></tr>
<tr><td>2.3</td><td>Provision of storage of segregated stream with capacity, permanent provision of flow meter, piping etc.</td><td>⇒ Treated wastewater storage tank-50 KL.
⇒ Unit has provided flow meter at ETP outlet line but at inlet line flow meter is not provided. Unit is instructed for the same.</td></tr>
</table>

<table>
<tr><td>2.4</td><td>Total Wastewater generation

(based on wastewater stream segregation such as high COD, low COD etc.)</td><td>A. Based on past 03 months record:
Based on past 03 months data (As per CETP discharge record) provided by industry the average wastewater generation is 46.59 kld.

<table><tr><td>Sep’25</td><td>1430 kl</td></tr><tr><td>Oct’25</td><td>1450 kl</td></tr><tr><td>Nov’25</td><td>1360 kl</td></tr></table>
B. As per CC&A:
Total wastewater generation is 85.60 kld (Dom:5.60 kld, Ind: 80 kld)
⇒ Generated 80 kld industrial wastewater shall be treated in to primary ETP along with advanced oxidation process and treated wastewater shall be send to MEE & MVR plant with ATFD.
⇒ 78 kld MEE & MVR condensate, 45 kld shall be send to CETP Saykha and 33 kld shall be sent to RO plant, 26 kld RO permeate shall be recycles in utility & process and the RO reject 7 kld shall be send to CETP Saykha.
⇒ Generated 5.6 kld domestic wastewater shall be disposed of through septic tank/ soak pit system.</td></tr>
<tr><td>2.5</td><td>Wastewater treatment process with capacity and operational status</td><td>Generated waste water is being treated in following treatment units;

Primary collection tank (8 KL & 20 KL)→ Neutralization tank (35 KL & 40 KL)→ Chemical solution preparation tanks (200 lit & 1000 lit)→ Hopper Bottom Settling tank (2 x 7 KL & 4 x 10 KL)→ filter press (3 nos. of 36”x36”)→ Final treated wastewater holding tank (20 KL, 50 KL, 50KL)→MEE (Cap. 25 KLD) with ATFD → MVR(60 KLD)→RO (cap.40 KLD)→ final treated effluent collection storage tank(3 x 50 KL)

⇒ During visit, ETP units, MEE, MVR, ATFD, RO are found in operation. MEE and MVR condensate and RO reject send to CETP Saykha. 26 kld RO permeate is recycled in utility and process within premises.
⇒ During visit, two water samples are collected from ETP inlet (collection tank) and ETP outlet (at sampling point located outside premises) for analysis purpose.
⇒ Treated wastewater is being discharged in to CETP Saykha through above ground pipeline (recently done) though GIDC sub-pumping station S-3C and PS-3.
⇒ Domestic wastewater is disposed in to soak pit/ septic tank.</td></tr>
<tr><td>2.6</td><td>On site Record keeping</td><td>Records for the operation of ETP, MEE, MVR & RO were maintained in log sheet.</td></tr>
<tr><td>2.7</td><td>Provision of any intermittent storage/guard pond etc. before disposal</td><td>Unit has provided 3 x 50 KL treated effluent storage tank.</td></tr>
</table>

2.8	Mode of disposal of wastewater (GIDC drain, CETP, ZLD, gardening direct)	Generated wastewater is being treated in primary ETP, MEE, MVR, RO and discharge into Saykha CETP through GIDC pipeline network.
2.9	Provision for flow meters at MEE feed, MEE condensate, RO etc. or any critical locations as per Consent	• TOC meter is provided at ETP final outlet. Unit has not provided flow meter on Inlet of ETP, MEE feed, MEE condensate, RO permeate. Hence instructed is given fo the same.
2.10	OCEMS/PTZ/Flowmeter provision, location of OCEMS, parameters monitored, working principle, its online connectivity to CPCB/GPCB server	TOC meter is provided at ETP final outlet. Unit is fall under small scale.
2.11	Any bypass/ponding/accumulation of wastewater inside or outside the premises observed	During inspection, no any bypass or illegal wastewater discharge observed from this unit.
3. Air emission management		
3.1	Flue gas emission details with APCM	Unit has provided agrowaste/Briquette/ Coal based two nos. of Boiler connected with common stack. Unit has provided separate APCM Multi cyclone, Bag filter and water scrubber with each boiler, which is found in operation during inspection and pH of scrubbing media is observed neutral on pH strip.
3.2	Process gas emission details with APCM	Unit has provided total five numbers of process gas emission stack i.e. Distillation column connect with three stage Alkali scrubber + Ventury scrubber as APCM, Reactor of HBR connect with two stage Alkali scrubber as APCM, Acidification reactor connect with two stage alkali scrubber as APCM, Liquid Bromine & Bromide solution storage tank connected with two stage alkali scrubber as APCM, Suction hood of Chlorine storage area connected with single Alkali scrubber as APCM. During inspection provided APCM are found in operation.
3.3	Any non-compliance observed under Air Act	None
4. Hazardous waste management		
4.1	Hazardous waste generation and disposal system	Unit has not submitted details of last three-month hazardous waste generation -disposal details during inspection. Later on submitted data, unit has disposed total ETP sludge & MEE Salt = 373.213 MT, Distillation Residue – 25.66 MT, Spent Solvent= 23.160 MT in duration of Sep'25 to Nov'25. During inspection, stock of ETP sludge & MEE Salt = 15 MT, Distillation Residue – 1.5 MT, Spent Solvent= 10 MT found stored in dedicated storage area.
4.2	Dedicated hazardous waste storage area with leachate	Unit has provided hazardous waste storage area with leachate collection system.

	collection system	
4.3	Membership certificate of common hazardous waste facility	Unit is member of BEIL Infrastructure Limited, Ankleshwar
4.4	Non-compliance observed under Hazardous waste management	At the time of the inspection, the ETP sludge, MEE salt and distillation residue stored in the hazardous waste storage area was found to be almost full. The hazardous waste needs to be disposed of on regular basis.

5. Other Observations

⇒ Housekeeping is found good within premises.

⇒ Earlier Boad had issued NOD for wastewater going outside premises through boundary wall seepage which is found concreting / sealed by the unit and back side area found dry. (photograph attached)

⇒ Unit has not furnished production and relevant technical details of A/W/H during visit.

⇒ Photographs taken during inspection are attached here with for reference.

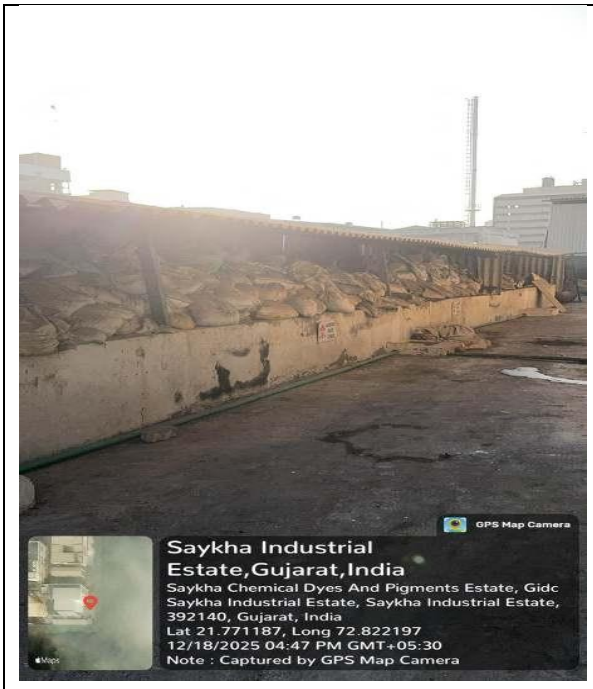
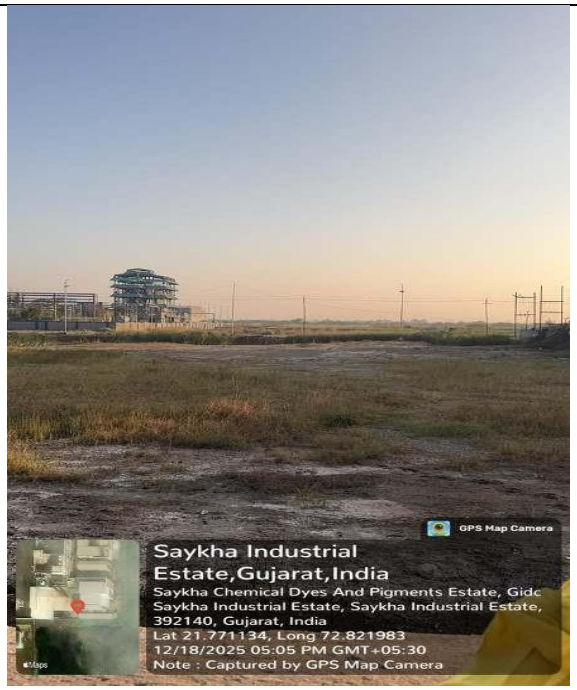
6. Written instructions given during inspection

1. □□ □□□ □□□□□ □□□□□□□□□□□□ Hon'ble NGT OA No. 128 of 2025 (WZ) dated-11/11/2025 □□□ specific reference □□□□□□□□□□□□□□. ETP inlet □□flow meter provide □□□□□.
2. □□□□□□□□□□□Hazardous waste storage □□□□□□□□ ETP sludge, MEE salt distillation residue □□□□□□ □□□□ □□□□□□□□ □□<□□□□□ consent condition □□□□ □□□□□□□□□.
3. □□è□□ ð□ □□□□□□□□ 5□□c□□, □□-□□□□□□□, □□□□□□□□□, □□ę□□□□□ □□□□□□-□□ę□□□□, fuel □□□□□, Hazardous waste generation-disposal□□ □□□□□ □□□□□□□ □□□□ □□□ □□□□ □ □□□ □□□□-□□□□□′□□□□□□□□□.

Photographs taken during inspection

Wastewater discharge was not observed from the boundary wall of the unit.

Housekeeping found good within plant premises

	
Hazardous waste storage area	Wastewater discharge was not observed in open located at back side of the unit and found dry during inspection

Date of Visit : **18/12/2025**

Name of Visiting Officials with designation :

M.M.Khimsuriya	B.A. Bhuva	R.K.Mehta	S.S.Valvi
(AEE)	**(AEE)**	**(SO)**	**(SO)**

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Inspection Report

<table>
<tr><td colspan="3">1. General Information of the Industry:</td></tr>
<tr><td>1.1</td><td>Name & Address</td><td>M/s. Aries Color Chem Pvt. Ltd. (PCB ID - 65170)
Plot No. DP-56 & 57, Saykha Industrial Estate, Taluka: Vagra, District: Bharuch.</td></tr>
<tr><td>1.2</td><td>Category & Scale
(as per CPCB categorization)</td><td>Red – Medium
(R42.1-I: Dyes, Dye Intermediates and Pigments produced by chemical synthesis)</td></tr>
<tr><td>1.3</td><td>Contact Person & Contact Numbers with email id</td><td>Mr. Viralbhai Kansara (HR-Admin Manager)
(Mob: 9909916784)
saykha@ariesgroup.in</td></tr>
<tr><td>1.4</td><td>Year of Establishment</td><td>2018</td></tr>
<tr><td>1.5</td><td>CC&A Validity</td><td>Consent No. AWH-151574 date of issue: 17/12/2025 valid up to 24/09/2030 and CC&A amendment no. AWH-129728 dated 29/01/2024.</td></tr>
<tr><td>1.6</td><td>Operational Condition</td><td>Operational</td></tr>
<tr><td>1.7</td><td>Present Manufacturing Products</td><td>During visit, the industry was manufacturing following products:
H-Acid,
Vinyl Sulphone Ester (VS)
Acetanilide
⇒ As information received, they have manufactured these abovementioned three products only since long, hence asked to clarify the manufacturing of other product as per consent and respective EMS system in provided plant machinery in the unit.</td></tr>
<tr><td>1.8</td><td>Main Raw Materials of present manufacturing product</td><td>Chlorosulphonic acid, Oleum, Napthalene, Sodium bisulphite (SBS), Soda, Sulphuric acid, Nitric acid, Ethylene oxide(EO)</td></tr>
<tr><td>1.9</td><td>Closure Directions issued by GPCB in past years wrt wastewater and hazardous waste management.</td><td><table><tr><td>Direction Act</td><td>Direction issue date</td><td>Direction effect</td><td>Revocation issue date</td></tr><tr><td>Water Act</td><td>03/05/2023</td><td>Immediate effect</td><td>06/07/2023 for 3 month</td></tr><tr><td>Water Act</td><td>30/08/2024</td><td>Immediate effect</td><td>27/09/2024 for 3 month</td></tr></table></td></tr>
<tr><td>1.10</td><td>Display Board at main entry gate</td><td>Physical display Board is provided.
Digital display Board as per CPCB guideline is not provided (unit fall under R17 category).</td></tr>
<tr><td colspan="3">2. Wastewater Management</td></tr>
<tr><td>2.1</td><td>Quantity of Fresh Water consumption and its source</td><td>A. Source: GIDC
B. Based on past 03 months billing record:
Based on past 03 months data (GIDC bill) provided by industry the average fresh water consumption is 121 kld.<table><tr><td>Sep’25</td><td>3581 kl</td></tr><tr><td>Oct’25</td><td>3634 kl</td></tr><tr><td>Nov’25</td><td>3821 kl</td></tr></table></td></tr>
</table>

<table>
<tr><td></td><td></td><td>C. As per CC&A:
Total water consumption 596.5 kld (Dom: 5.5 kld, Gardening: 30 kld, Ind: 561 kld)</td></tr>
<tr><td>2.2</td><td>Wastewater segregation with specification of criteria of such segregation (if any)</td><td>Unit has segregated into two streams based on high COD and low COD content of wastewater.</td></tr>
<tr><td>2.3</td><td>Provision of storage of segregated stream with capacity, permanent provision of flow meter, piping etc.</td><td>Total storage facility for low COD wastewater is 400 kl and total storage facility for high COD wastewater is 980 kl (plant wise tanks provided and total storage capacity; H acid plant – total 340 kl, VS plant: total 140 kl, MEE plant – total 900 kl).</td></tr>
<tr><td>2.4</td><td>Total Wastewater generation

(based on wastewater stream segregation such as high COD, low COD etc.)</td><td>A. Based on past 03 months record:
During inspection wastewater disposal details are not provided, later on submitted data of MEE feed/SD feed and CETP discharge are as follow:
<table>
<tr><th>Month</th><th>MEE feed, m^3</th><th>SD feed, m^3</th><th>CETP discharge,m^3</th></tr>
<tr><td>Sep’25</td><td>3495</td><td>1304</td><td>1860</td></tr>
<tr><td>Oct’25</td><td>3180</td><td>1297</td><td>2255</td></tr>
<tr><td>Nov’25</td><td>3800</td><td>1476</td><td>2059</td></tr>
</table>
B. As per CC&A:
Total wastewater generation is 431.4 kld (Dom: 4.4 kld, Ind: 427 kld)
(a) Low concentrated effluent: 114.4 kld (washing-5 kld, boiler-3 kld, cooling-1 kld, scrubber- 20kld, mfg-85.4 kld). Treated in P+S+T ETP and then treated effluent shall be sent to CETP Saykha for further treatment and disposal.
(b) High concentrated effluent: 92.6 kld shall be treated in primary ETP and then evaporated in in-house MEE. 220 kld send to inhouse salt recovery unit consisting neutralization and crystallizer.</td></tr>
<tr><td>2.5</td><td>Wastewater treatment process with capacity and operational status</td><td><u>For industrial wastewater</u>
The treatment process for high COD & low COD were operational during visit. The process brief is provided below:
• For High COD:
Plant wise storage tanks→MEE feed tank→ MVR (5000 lit/hr) & MEE (6000 lit/hr)→MEE condensate→ reuse in utility→ MEE concentrate→ Spray dryer (6000 kg/hr)

⇒ Unit has provided two MEE; one having MVR system (cap: 5000 lit/hr) dedicated for H acid high concentrated stream and one MEE (cap: 6000 lit/hr) dedicated for VS concentrated stream.
⇒ During visit, both MEE & MVR system are found in operation. MEE condensate is utilised within premises in utility area.

• For Low COD:</td></tr>
</table>

		Collection tanks (2 x 200 KL)→neutralization tank (2 x 50 KL) (with hydrated lime dosing facility)→ filter press (02 no.) →primary holding tank (70 KL)→primary settling tank (50KL)→Aeration tank-1(640 KL)→SST-1(50 KL)→ Aeration-2 (490 KL)→SST-2 (50 KL)→intermediate storage tank (200 KL)→S+C filter→discharge tank (10 KL, HDPE)→CETP Saykha through GIDC pumping station ⇒ During visit, provided ETP units are found in operation. ⇒ Two water samples are collected from ETP inlet and ETP outlet (discharge point located outside premises) for analysis purpose. ⇒ Unit has obtained GIDC drainage release certificate for 114.4 KLD effluent discharge. ⇒ Unit needs to do proper nomenclature in ETP tanks with capacity & put flow diagram in ETP area. **For domestic wastewater** ⇒ Domestic wastewater is treated along with low COD industrial effluent in ETP. (as per latest consent CC&A amendment no. AWH-129728 dated 29/01/2024) condition no. 3.3 (f) domestic wastewater shall be treated in to STP and treated sewage shall be reuse in gardening purpose within premises.
2.6	On site Record keeping	Records for the operation of ETP, MEE, SD were maintained in log sheet.
2.7	Provision of any intermittent storage/guard pond etc. before disposal	Unit has provided 10 KL HDPE treated effluent holding cum discharge tank and having 200 KL (RCC, u/g) intermediate storage tank before tertiary treatment. Hence, instructed to provide adequate storage facility for treated effluent as per consent (CC&A amendment no. AWH-129728 dated 29/01/2024) condition no. 3.6.
2.8	Mode of disposal of wastewater (GIDC drain, CETP, ZLD, gardening direct)	⇒ Hogh COD wastewater → ZLD through MEE/MVR, SD ⇒ Low COD wastewater→CETP Saykha after treatment in ETP (P+S+T) through GIDC pipeline network. ⇒ Domestic wastewater→ CETP Saykha after treatment in ETP (P+S+T) through GIDC pipeline network.
2.9	Provision for flow meters at MEE feed, MEE condensate, RO etc. or any critical locations as per Consent	⇒ Flow meter is provided at ETP outlet, MEE/MVR, SD system and reading noted (totalizer); MEE feed (for VS plant stream) – 28973.341 m^3, MVR feed (for H Acid plant stream) – 37466.470 m^3, MVR condensate – 22163.236 m^3, MEE condensate – 3135.462 m^3, SD feed (for effluent) – 32145400.7 lit. ⇒ Unit has not provided flow meter at ETP inlet (for low COD).
2.10	OCEMS/PTZ/Flowmeter provision, location of OCEMS,	Provided ⇒ Unit has not provided flow meter at ETP inlet (for low COD)

	parameters monitored, working principle, its online connectivity to CPCB/GPCB server	so written instruction is given in this regard during inspection. ⇒ During inspection, online analyser at ETP outlet line reading noted; TOC-203.29 ppm, COD-532.34 ppm, BOD-148.90 ppm, TSS-18.38 ppm, pH-7.86. ⇒ Online analyser connectivity with GPCB/CPCP server is not done.
2.11	Any bypass/ponding/accumulation of wastewater inside or outside the premises observed	⇒ During inspection, no any bypass or illegal wastewater discharge observed from this unit. ⇒ In plant area, scrubber area leakages of pumps are observed and due to this these area housekeeping was found poor. Unit is instructed to do regular maintenance to avoid such situation. However, provided area is acid brick lining and the leakage area was limited for respective plant and no spilled material was released outside the plant.
3. Air emission management		
3.1	Flue gas emission details with APCM	⇒ Unit has provided two coal fired boiler (8 TPH & 6 TPH) connected with individual APH, MDC, bag filter, wet scrubber with common stack. During visit, one boiler is found in operation. Unit has provided 2 no. of TFH (cap: 10 lac kcal/hr) connected with each cyclone dust collector followed by common stack. Unit has not provided APCM as per existing consent with both TFH. One TFH is in operation. One spray dryer for effluent is connected to an HAG of 75 lakh Kcal, and another for the product with cyclone separator followed by a wet scrubber as APCM. During the inspection, the effluent spray dryer was found in operation. Unit has not installed Hot air generator (50 lac kcal/hr). DG set (2 x 500 kVA) is stand by purpose. Stack sampling attached with spray dryer for effluent is collected for analysis purpose.
3.2	Process gas emission details with APCM	⇒ Unit has provided ventury tanks (2 nos.), water + alkali scrubber with connected to reaction vessels in H-acid mfg plant. Unit has provided two stage scrubber system with VS mfg plant. During inspection, both plant scrubber system was found in operation and physical verify final stage scrubbing media pH and it is found >10.5 on pH strip. ⇒ Provided process scrubber systems in both production plant is found in operation. Process stack sample collected from H-acid plant process stack for parameter SO_2 and process stack sample from VS plant for parameter HCl & SO_2. Stack sampling attached with spray dryer for effluent is collected for analysis purpose for parameter PM.
3.3	Any non-compliance observed under Air Act	⇒ During inspection, fugitive emission sensed behind VS manufacturing plant, upon asking for the same plant in charge informed that it is due to gland leakage of the

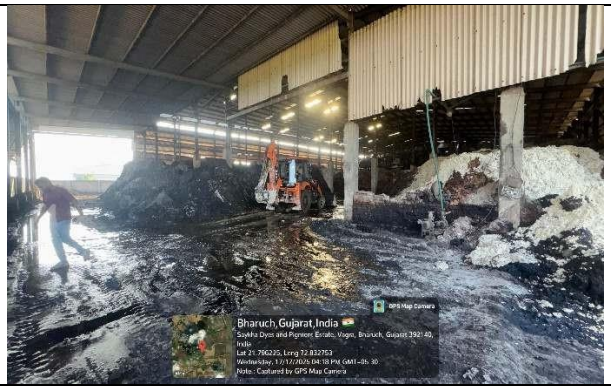
		pump of the Aniline storage tank and instructed to take corrective measures for the same.
4. Hazardous waste management		
4.1	Hazardous waste generation and disposal system	⇒ Unit has not submitted details of last three-month hazardous waste generation -disposal details during inspection. Later on submitted data, unit has disposed total gypsum sludge – 4919.45 MT, Iron sludge – 287.76 MT, spray dryer sludge – 1968.02 MT, HCl – 296.21 MT in duration of Sep'25 to Nov'25. ⇒ During visit, stock of gypsum sludge @ 550 MT, iron sludge @ 450 MT, spray dryer salt @ 400 MT, spent HCl @ 7 KL found stored in dedicated storage area.
4.2	Dedicated hazardous waste storage area with leachate collection system	Provided
4.3	Membership certificate of common hazardous waste facility	Unit has obtained membership of TSDF sites i.e. BEIL infrastructure Ltd. & Shesh Enviro Infra Pvt Ltd.
4.4	Non-compliance observed under Hazardous waste management	⇒ Huge quantity of sludge found stored in storage area which need to be disposed in regular manner. ⇒ Housekeeping behind H acid plant (LSP yard) is found poor.
5. Other Observations		
⇒ Earlier Board had issued closure direction under the Water Act on 30/08/2024 for contaminated water ponding inside and outside premises where presently found dry area during visit (photograph attached). ⇒ Unit has provided storm water drain (SWD) within premises with SWD re-collection pit with fix pump and pipeline up to ETP. ⇒ There is no any wastewater discharge found from unit as well as accumulation of wastewater outside near by area. ⇒ Unit has not furnished production and relevant technical details of A/W/H during visit. ⇒ Photographs taken during inspection are attached here with for reference.		
6. Written instructions given during inspection		
1. Hon'ble NGT OA No. 128 of 2025 (WZ), Dated-11/11/2025 specific reference		
2. H-acid Vinyl Sulphone Ester (VSE), Acetanilide		
3. Consent dated-29/01/2024 treated w/w storage (in case of Emergency)		
4. Low COD ETP inlet flow meter record maintain		

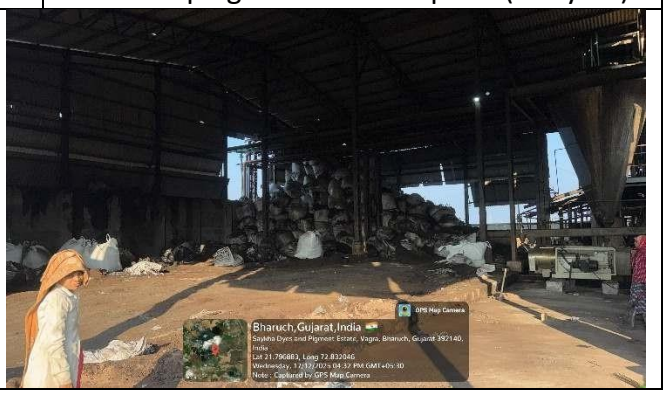
5. H-acid □□□ VSE □□□ mfg. Ø□□ø□□□□ ground floor □□ □□□□□□ □□□□□ pumps □□□ leakages □□□□□□ □□□□ regular maintain □□□□□□□ □□□ □□□ □□□□□□□□ Housekeeping □□□□□□□□.
6. □□□□□□□ □□□□ VSE Ø□□ø□□□□ □□□□□□ □□□□□□ Aniline storage tank □□□ pump □□ gland leakage □□□□□□ □□□ □□□□□□□□ fugitive emission □□□ □□□□ □□□ □□□□□□□□□ □□□□□ □□□□ □□□□□□<□□ □□□□□ □□□□.
7. H-acid Ø□□ø□□□□ □□□□□□□ □□□□□□ LSP yard □ë□ Housekeeping □□□□□□□□.
8. Hazardous waste storage □□□□□□□□ Gypsum sludge, iron sludge □□□ SD salt huge quantity □□□ store □□□□ □□□□ □□□□ □□□□ consent condition □□□□ □□□□□ □□□□.
9. ETP □□□□□□□□, process stack with scrubber system, Hazardous waste storage □□□□□, MEE, SD □□□□□□□□ □Q□□ □□□□□□, flow sheet diagram (with capacity) □□□□□ □□□□ easily understand □□ □□□.
10. □□è□□ ö□ □□□□□□□□ 5□□C□□, □□-□□□□□□□, □□□□ □□□□□, w/w generation-disposal, fuel □□□□□, Hazardous waste generation-disposal/reuse □□ □□□□□ □□□□□□□ □□□□ □□□ □□□□ □□□.
11. □□□□ □□□□ □□□□□□ □□□□ □□□□ □□□□□□□□□ compliance □□□□□□ □□□□□.

Photographs taken during inspection

Leakages in production plant area

Housekeeping behind H acid plant (LSP yard)





Huge quantity of gypsum and iron sludge, SD/ MEE salt fund stored in covered shed

SWD re-collection system

Open land inside premises where earlier found w/w ponding as mentioned in closer direction

View of outside premises near main gate boundary wall area and besides boundary wall area where earlier found w/w as mentioned in closer direction

Date of Visit : **17/12/2025**
:

Name of Visiting Officials with designation

B.A. Bhuva
(AEE)

R.K.Mehta
(SO)

Inspection Report

<table>
<tr><th colspan="3">1. General Information of the Industry:</th></tr>
<tr><td>1.1</td><td>Name & Address</td><td>Gujarat Industrial Development Corporation (CETP-Saykha) (PCB ID – 71763)
Plot no. E-9 to E-13, E-15 to E-17, E-32 to E-37, GIDC Saykha, Taluka: Vagra, District: Bharuch.</td></tr>
<tr><td>1.2</td><td>Category & Scale (as per CPCB categorization)</td><td>Red – Large
(R1.1-IIR: CETP having MEE/spray drier)</td></tr>
<tr><td>1.3</td><td>Contact Person & Contact Numbers with email id</td><td>Mr. Munnabhai Mishra
(Mob: 7984135327)
xen-brc@gidcgujarat.org & 40mldcetpsaykha@gmail.com</td></tr>
<tr><td>1.4</td><td>Year of Establishment</td><td>2021</td></tr>
<tr><td>1.5</td><td>CC&A Validity</td><td>Consent No. AWH-116130 date of issue: 04/12/2021 valid up to 05/07/2026</td></tr>
<tr><td>1.6</td><td>Operational Condition</td><td>Operational</td></tr>
<tr><td>1.7</td><td>Present Manufacturing Products</td><td rowspan="2">No manufacturing activity, this is common facility (CETP) for treatment of primary treated wastewater generated from member industries located in Saykha Industrial estate operated by GIDC.</td></tr>
<tr><td>1.8</td><td>Main Raw Materials of present manufacturing product</td></tr>
<tr><td>1.9</td><td>Closure Directions issued by GPCB in past years wrt wastewater and hazardous waste management.</td><td>None</td></tr>
<tr><td>1.10</td><td>Display Board at main entry gate</td><td>Not provided
Digital display Board is also not provided as per CPCB guideline.</td></tr>
<tr><th colspan="3">2. Wastewater Management</th></tr>
<tr><td>2.1</td><td>Quantity of Fresh Water consumption and its source</td><td>A. Source: GIDC
B. Based on past 03 months billing record:
CETP has not furnished GIDC bill for fresh water consumption, as contacted person informed that this CETP is property of own GIDC so that they have not prepare proper GIDC bill however flow meter is provided on fresh water supply line and CETP has maintained record on day to basis and based on that last three-month water consumption is as follow:
<table><tr><td>Sep’25</td><td>1683 kl</td></tr><tr><td>Oct’25</td><td>1690 kl</td></tr><tr><td>Nov’25</td><td>1627 kl</td></tr></table>The average fresh water consumption is 54.94 kld

C. As per CC&A:
Total water consumption 60.5 kld.</td></tr>
<tr><td>2.2</td><td>Wastewater segregation with specification of criteria of such segregation (if any)</td><td>No segregation required.</td></tr>
</table>

<table>
<tr><td>2.3</td><td>Provision of storage of segregated stream with capacity, permanent provision of flow meter, piping etc.</td><td>⇒ Presently raw effluent storage tank capacity equalization tank capacity (20 MLD x 2 nos.) and treated wastewater holding tank 3.1 MLD and it is part of CETP treatment units not as emergency separate storage facility. 90 MLD guard pond for storage of treated effluent from CETP is under construction stage.</td></tr>
<tr><td>2.4</td><td>Total Wastewater generation

(based on wastewater stream segregation such as high COD, low COD etc.)</td><td>A. Based on past 03 months record:
During inspection effluent receiving -disposal details are not provided, later on submitted data:
<table><tr><td>Month</td><td>Receive, m^3</td><td>Discharge, m^3</td></tr><tr><td>Sep’25</td><td>52941</td><td>70829</td></tr><tr><td>Oct’25</td><td>59654</td><td>72510</td></tr><tr><td>Nov’25</td><td>54117</td><td>64762</td></tr></table>B. As per CC&A:
⇒ The quantity of washing effluent generation from CETP shall not exceed 3 kld and domestic wastewater 6 kld which shall be treated in to CETP.
⇒ Trade effluent received from member units shall not exceed 40 MLD.</td></tr>
<tr><td>2.5</td><td colspan="2">Wastewater treatment process with capacity and operational status</td></tr>
<tr><td></td><td colspan="2">Following treatment units are provided in CETP (for treatment of effluent received from member units, inhouse generated washing effluent and domestic wastewater):

Inlet chamber →bar screen→ fine bar screen→grit chamber→ O&G removal tank→ equalization tank 1 & 2 (each 20 MLD)→ neutralization tank (12 nos. x 100 m^3) and 4 nos. of 100 m^3 flash mixer with (lime/PAC/poly/$FeSO_4$)→Primary Clariflocculator (2 x 5000 m^3) with primary sludge sump (185 m^3) & thickener (5 nos. x 2034 m^3), leachate sump (480 m^3), filter press (8 nos. of 1500 mm x 1500mm)→bio tower feed sump→bio tower re-circulation sump→oxidation ditch (4 nos. x 27000 m^3)→secondary clarifier (4 nos. x 2921 m^3)→secondary treated sump (3367 m^3)→statis mixer (addition of chlorine/lime/SBS/$FeSO_4$/Poly electrolyte)→tertiary Clariflocculator (2 nos. x 4396 m^3)→tertiary sludge sump (185 m^3)→dual media filter (4 nos.) with back wash over head tank (100 m^3)→tertiary treated sump(3367 m^3)→ACF (16 nos.)→treated wastewater holding final tank (3.1 MLD)→Dahej-Vilayat pipeline (25 MLD)→Ambheta FPS→deep sea discharge

⇒ During inspection, only primary treatment and oxidation ditch-1 is found in operation and rest of the treatment units are found non-functional.
⇒ Two water samples are collected from CETP inlet (equalization tank) & CETP outlet (treated w/w holding cum discharge tank) for analysis purpose.
⇒ As information and data provided, presently CETP discharge to Dahej Vilayat pipeline done twice a week due to unviability of dedicated discharge line of CETP. New 90 MLD pipeline from CETP to FPS is under construction stage, once this line laydown they will discharge regularly from CETP. However, CETP has instructed to prepare schedule for regular discharge from CETP till the new pipeline work completed.</td></tr>
</table>

	⇒ Effluent receiving from member units to CETP through above ground pipeline network is under progress and CETP has instructed to submit progress report for the same with map and updated CETP member unit list with effluent qty.	
2.6	On site Record keeping	CETP has maintained record in log sheet for CETP operation but it is not proper so instructed for the same during inspection.
2.7	Provision of any intermittent storage/guard pond etc. before disposal	⇒ Presently not available and provided storage facility is part of CETP units. However, 90 MLD guard pond for the same is under construction stage beside CETP area.
2.8	Mode of disposal of wastewater (GIDC drain, CETP, ZLD, gardening direct)	⇒ Treated wastewater from CETP is discharged in to deep sea through Ambheta FPS through Dahej-Vilayat pipeline network
2.9	Provision for flow meters at MEE feed, MEE condensate, RO etc. or any critical locations as per Consent	⇒ Unit has provided flow meter (totalizer) at inlet chamber and reading noted – 726353 m^3 and final outlet line – 580701.9784 m^3.
2.10	OCEMS/PTZ/Flowmeter provision, location of OCEMS, parameters monitored, working principle, its online connectivity to CPCB/GPCB server	⇒ Unit has provided online analyzer on CETP outlet/ discharge line for parameter TOC, COD, TN, pH meter which is found not in operation during inspection. Unit is instructed to repair for the same and submit calibration record.
2.11	Any bypass/ponding/accumulation of wastewater inside or outside the premises observed	None
3. Air emission management		
3.1	Flue gas emission details with APCM	⇒ CETP has provided 2500 kVA 5 nos. of DG set for stand by purpose. Which is found not in operation during inspection.
3.2	Process gas emission details with APCM	⇒ CETP has provided one process vent attached with chlorine tonner safety hood and single stage alkali scrubber which is found not in operation as chlorine treatment is not going on.
3.3	Any non-compliance observed under Air Act	None
4. Hazardous waste management		
4.1	Hazardous waste generation and disposal system	⇒ CETP has not provided any details of hazardous waste generation and disposal during inspection, later on as per provided data they had send total 118.51 MT of ETP sludge to TSDF BEIL Dahej though manifests systems. ⇒ During inspection, stock of ETP sludge @ 65 MT found stored in hazardous waste storage area shed.
4.2	Dedicated hazardous waste storage area with leachate collection system	Provided
4.3	Membership certificate of common hazardous waste facility	⇒ CETP has obtained TSDF BEIL, Dahej membership for disposal of 1000 MT/Year landfill hazardous waste.

4.4	Non-compliance observed under Hazardous waste management	Unit is instructed to submit details of hazardous waste generation disposal from last 1 year with data.

5. Other Observations

⇒ Unit is instructed to submit compliance status of CC&A conditions given under the Water Act with data/evidence of Existing ongoing work/proposed work with map/ pipeline network to Board with evidence.

⇒ Unit has not furnished last one year effluent inlet – discharge effleunt, chemical dosing, hazardous waste generation-disposal details during visit.

⇒ Photographs taken during inspection are attached here with for reference.

6. Written instructions given during inspection

1. Hon'ble NGT OA No. 128 of 2025 (WZ) dated-11/11/2025 specific reference
2. CETP primary treatment oxidation ditch-1 treatment
3. CETP treated effluent Dahej-Vilayat pipeline exiting 25 MLD weekly effluent discharge daily basis 90 MLD pipeline existing pipeline regular discharge schedule.
4. CETP inlet-outlet line online analyzer under maintenance calibration report.
5. CETP operation record maintain proper printed record maintain.
6. CC&A specific condition no. 7 member unit CETP above pipeline sub GIDC pipeline network map with industry name, qty.
7. Existing CC&A Water Act condition wise compliance report with data/evidence (Existing ongoing work/proposed work with map if required.
8. compliance compliance with evidence.
9. CETP generate Hazardous waste record with manifest. (generation-disposal with qty.)
10. As on date CETP-Saykha member unit updated list with capacity tabulation format.
11. CETP inlet effluent, discharge effluent, chemical closing, Hazardous waste generation-disposal.

Photographs taken during inspection

Sludge storage area of the CETP

Date of Visit : **18/12/2025**

Name of Visiting Officials with designation :

M.M.Khimsuriya	B.A. Bhuva	R.K.Mehta	S.S.Valvi
(AEE)	**(AEE)**	**(SO)**	**(SO)**

Gujarat Pollution Control Board

C-1/119/3,GIDC,Phase-II, Narmadanagar, BHARUCH-392 015. Phone : (02642) 246333
Email : ro-gpcb-bhar@gujarat.gov.in Web site : www.gpcb.gujarat.gov.in

BY Speed Post

SHOW CAUSE NOTICE

WHEREAS you Horbex Medicines are having industrial plant located at, Plot No. C-236, GIDC Industrial Estate, Saykha, TAL: Vagra, DIST: Bharuch – 392140.

AND WHEREAS, the board officer had visited unit on dated 18/12/2025 and following non-compliance were observed:-

- During visit, it is observed that contaminated water ponding observed on open GIDC plot adjacent to boundary wall.
- Unit has not provided flow meter at inlet line of ETP.
- Unit has not maintaining the record for logbook of ETP operation.

NOW THEREFORE, in exercise of the powers vested with this Board Under Section 33-A of the Water (Prevention and Control of Pollution) Act-1974, notice is hereby served on you, to show cause notice within 15 days from the date of receipt of this show cause notice in view of the non-compliance observed above and why legal action should not be initiated as per the provision of the Acts.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(K.N.VAGHAMSHI)
REGIONAL OFFICER, BHARUCH.

Outward No. GPCB/RO-BRCH/ID-87891/8241 DT. 03/01/2026

To,
Horbex Medicines
Plot No. C-236, GIDC Industrial Estate, Saykha,
TAL: Vagra, DIST: Bharuch – 392140.

100

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

GPCB

SPEED POST

NOTICE OF DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974 (HEREINAFTER REFERRED TO AS THE "WATER ACT") AS AMENDED FROM TIME TO TIME.

WHEREAS you **M/s. SKY Intermediate** are having an industrial plant at Plot No.: C-133, Saykha Industrial Estate, Tal. Vagra, Dist.: Bharuch.

AND WHEREAS Gujarat Pollution Control Board had granted CCA (AWH-147795) valid up to 17/02/2030 for manufacturing activity subject to compliance of conditions mentioned therein.

AND WHEREAS during the inspection of your industrial plant on **18/12/2025** under Section - 23 of the Water Act with reference to CCA-fresh application by the authorized officers of the Board and it has been observed that:

(1) During visit Leakages/ spillages observed in scrubber re-circulation tank.
(2) Unit has not provided flow meter in re-use line of ETP.
(3) Unit has installed under capacity MEE (48 kld) against 66 kld wastewater generation as per consent condition.
(4) Unit is not maintaining proper records for the operation of ETP, MEE and Spray Dryer.
(5) During visit, it is observed that contaminated water ponding (total area @ 4800 sq.mt, @ 1.5 to 2 ft uneven depth) on GIDC open plot adjacent to boundary wall of the unit.
(6) During visit all over housekeeping in manufacturing plant area, ETP area, scrubber area and hazardous waste storage area are found poor due to leakages/ spillages.
(7) Unit has not provided Storm Water Drain.
(8) During visit Pump connected with leachate collection pit provided in hazardous waste storage area is found under maintenance.
(9) Unit has not provided nomenclature and flow diagram showing ETP each unit capacity and overall design capacity, also not furnished detail with evidence.
(10) Unit has not furnished production and relevant technical details of Air/Water/Hazardous during visit.

Now, therefore I Dr. S. N. Agravat, Unit Head - Bharuch proposes to issue Notice under Section (33) (A) of the Water (Prevention and Control of Pollution) Act-1974 as under:

1. Why not to issue direction under section 33-A of the Water (Prevention and control of pollution) Act – 1974 to prohibit you from manufacturing activity?
2. Why not to direct to concern authority for disconnection of Power Supply & Water Supply of your industrial plant?

You are hereby directed to reply & submit compliance of above points within 15 days from the date of serving of this notice failing which, it shall be presumed that you have nothing to say in this matter and appropriate action will be initiated against you for the conduct of the business of your industry, under the Water Act-1974 for above non-compliance.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

Approved
(Dr. S.N. AGRAVAT)
UNIT HEAD-BHARUCH

NO: GPCB/BRCH-CCA-1740(3)/ID:80461/ Date: /01/2026

Issue to:
M/s. SKY Intermediate
Plot No.: C-133, Saykha Industrial Estate,
Ta: Vagra, Dist.: Bharuch-392140.

Copy To:

- **Regional Officer,**
  Gujarat Pollution Control Board,
  Regional Office,
  Bharuch..... to visit & verify compliance and send IR/AR within 15 days.

GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

SPEED POST

CLOSURE DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974 [HEREINAFTER REFERRED TO AS THE WATER ACT] AS AMENDED FROM TIME TO TIME

WHEREAS you **M/s. Shlokka Dyes Pvt. Ltd.** having an industrial plant at Plot No: C/54, GIDC Saykha, Tal: Vagra, Dist: Bharuch.

AND WHEREAS you are having CC&A (AWH-128084) valid up to 18/05/2028 for manufacturing activity/operation of industrial plant subject to compliance of conditions mentioned therein.

AND WHEREAS during the inspection of your industrial plant on **18/12/2025** by the authorized officer of the Board and it has been noticed that:

1) During inspection observed that unit is directly discharging washing wastewater without any treatment to GIDC open kachha drain and plot/ land.
2) During inspection, behind boiler area live discharge of untreated dark blue colored wastewater flow falling from roof top (drain provided for rain water disposal in roof top) which is directly enter in to GIDC kachha storm water drain (SWD) outside the premises and going towards south direction (after GIDC road crossing) in to open GIDC plot/ land and spread up to 250 m area where dark blue colored wastewater ponding/ puddle observed (approx. area of w/w puddle is @ 12000 sq.mt having @ 0.5 to 1 ft uneven depth) and also top soil is found contaminated.
3) Looking to site condition inside and outside premises it seems that unit may regularly discharge this washing wastewater to outside premises.
4) Analysis report of sample collected from contaminated water ponding/ puddle spread on open GIDC plot (South Direction from unit) shows BOD: 836 mg/l, COD: 6490 mg/l, Chloride: 4272 mg/l and Colour: 50000 Pt.Co.Sc.
5) Analysis report of sample collected from free fall of contaminated water through roof top rain water collection system behind boiler area shows: BOD: 138 mg/l, COD: 936 mg/l, Chloride: 1034 mg/l, Colour: 45000 Pt.Co.Sc.
6) During visit, provided ETP units were found not in operation and flexible pipeline observed in ETP area connected to pump.
7) Leakages/spilled wastewater found in ETP area.
8) Unit has not provided flow meter at ETP inlet. Provided online TOC meter at ETP final outlet line is found not working. Unit has not connected online analyser with GPCB/CPCB server.
9) Provided STP is found in idle condition and looking to its condition it seems that it was not operated since long.
10) Unit is not maintained logbook for the operation of ETP and STP.
11) Unit has provided pump facility with collection pit near main gate for collection of contaminated run off/ emergency spillage however not provided fix pipeline up to ETP.
12) Unit has not provided storm water drain (SWD) within premises.

AND WHEREAS unit has submitted reply of written instructions given during inspection as an opportunity of being heard (chance of hearing) and submitted reply is not acceptable.

AND WHEREAS looking to the observation during the said visit you have violated provisions of the Environmental laws.

UNDER THE CIRCUMSTANCES, I Dr. S. N. Agravat, Unit Head- Bharuch, Gujarat Pollution Control Board as directed issue the direction under Section 33(A) of the Water (Prevention and Control of Pollution) Act – 1974 as under:

1) To prohibit the manufacturing activity on 15th day from the date of this order at Plot No. C/54, GIDC Saykha, Tal: Vagra, Dist: Bharuch.
2) To close the operation of your industrial plant on the above mentioned site on 15th day.
3) To direct the concerned authority to stop supply of water and electricity (except single phase) on 15th day.
4) This order shall be effective on 15th day.
5) Unit shall pay Environment Damage Compensation (EDC) as and when communicated by the Board.
6) Unit shall lift all contaminated effluent and soil and dispose the same in environmentally sound manner.
7) To submit Bank Guarantee of Rs. 3 Lacs for compliance assurance at the time of revocation.

Non-compliance or violation of the aforementioned direction/order will constrain Board to initiate action as per provision of section-41A(1) of the Water (Prevention and Control of Pollution) Act-1974 and amendment thereof.

If you are aggrieved by the aforesaid direction, you may file an appeal under Section 33B of the Water (Prevention and Control of Pollution) Act, 1974 before National Green Tribunal within thirty days from the date of this order.

This order is issued with the approval of competent authority of the Board.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(Dr. S. N. AGRAVAT)
UNIT HEAD- BHARUCH

NO: GPCB/BRCH/CCA-1636(3)/ID-84022/ **Date: /01/2026**

Issued to:
M/s. Shlokka Dyes Pvt. Ltd.,
Plot No.: C/54, GIDC Saykha,
Tal. Vagra, Dist. Bharuch-392130.

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

Copy to:

1) **The Superintendent Engineer (O&M)**
   Circle Office,
   Dakshin Gujarat Vij Co Ltd,
   Maktampur Road, Bharuch..... for information & n.a. please.
2) **The Executive Engineer (O&M)**
   Circle Office,
   Dakshin Gujarat Vij Co Ltd,
   Maktampur Road, Bharuch. ..... for information & n.a. please.
3) **The Deputy Engineer (O&M)**
   Circle Office,
   Dakshin Gujarat Vij Co Ltd
   Maktampur Road,
   Bharuch..... I am directed to request you to disconnect **ELECTRICITY SUPPLY (except single phase) WITH 15TH DAY EFFECT** from the date of issue of this order to the industrial plant **of M/s. Shlokka Dyes Pvt. Ltd., Plot No.: C/54, GIDC Saykha, Tal: Vagra, Dist: Bharuch** & inform to us accordingly.
4) **The Deputy Executive Engineer (Drainage),**
   First Floor, Narmada Commercial Complex,
   Panchbatti, GIDC,
   Bharuch..... I am directed to request you to disconnect **WATER SUPPLY WITH 15TH DAY EFFECT** from the date of issue of this order to the industrial plant of **M/s. Shlokka Dyes Pvt. Ltd., Plot No.: C/54, GIDC Saykha, Tal: Vagra, Dist: Bharuch** & inform to us accordingly.
5) **The Regional Officer**
   Gujarat Pollution Control Board,
   Regional Office,
   Bharuch..... to follow up for compliance of this Direction & send IR/AR.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

Agravat

(Dr. S. N. AGRAVAT)
UNIT HEAD- BHARUCH

[redacted]

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

GPCB

SPEED POST

SHOW CAUSE NOTICE

WHEREAS you M/s. Shlokka Dyes Private Limited are having an industrial plant at Plot No.: C/54, GIDC Estate Saykha, Ta.: Vagra, Dist.: Bharuch.

AND WHEREAS Gujarat Pollution Control Board had granted CCA (AWH-128084) valid up to 18/05/2028 for manufacturing activity subject to compliance of conditions mentioned therein.

AND WHEREAS during the inspection of your industrial unit by officials of the Board on dtd. 18/12/2025 it has been noticed that:

(1) Coal is stored openly and also spread outside premise behind boiler area.
(2) Contaminated bags/liners/carboys/barrels are found stored hap-hazard manner in covered shed in one portion of production plant and some quantity also in hazardous waste storage area besides ETP which is found full and some portion is lying down outside the shed hence provided hazardous waste storage area seems not adequate.
(3) Unit has not provided display board at main entry gate.

In view of the above, you are called upon to show cause within 15 days why legal action should not be initiated against your industrial unit. Please note that failure to provide above information within 15 days; it will be understood that you have nothing to say in this regard and therefore the Board will take action in accordance with the relevant Environment Acts/ Rules.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(Dr. S.N. AGRAVAT)
UNIT HEAD - BHARUCH

NO: GPCB/BRCH-CCA-1636(3)/ID:84022/ **Date: /01/2026**

Issue to:
M/s. Shlokka Dyes Private Limited
Plot No.: C/54, GIDC Estate Saykha,
Ta.: Vagra, Dist.: Bharuch-392140.

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

GPCB

SPEED POST

STAY OVER DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974

WHEREAS you **M/s. Shlokka Dyes Private Limited** having an industrial plant at Plot No.: C-54, GIDC Saykha, Ta: Vagra, Dist.: Bharuch.

AND WHEREAS you are having CCA No. AWH-128084 valid up to 18/05/2028 for manufacturing activity/to operate industrial plant subject to compliance of various conditions mentioned therein.

AND WHEREAS GPCB has issued closure direction under Section 33-A of the Water Act-1974 for the closure of your industrial plant with 15th days effect vide letter no: GPCB/BRCH/CCA-1636(3)/ID-84022/890855, dated 09/01/2026 for reasons stated therein.

AND WHEREAS you have submitted **notarized undertaking** dated **12/01/2026** ensuring that you have complied directions issued to you by the Board.

AND WHEREAS you have submitted the **Bank Guarantee of Rs. 3,00,000/-** of State Bank of India valid up to **11/01/2028** for compliance assurance.

AND WHEREAS you have deposited interim Environment Damage Compensation (EDC) **Rs. 3,40,000/-(Three Lacs Forty Thousand)** to the Board on dated 23/01/2026.

AND WHEREAS during the inspection of your industrial plant on **20/01/2026** by the authorized officers of the Board, it was observed that:

1) During visit, no any live direct discharge of wastewater is observed from the unit.
2) Unit has completely replaced pipeline to prevent any recurrence.
3) Unit has lifted colored wastewater approximately 150 KL through a pipeline from open GIDC plot/land and temporarily stored within the premises in two vessels, each having a capacity of 75 KL.
4) Unit has also collected @ 2.5 MT of contaminated soil and safely stored in Hazardous Waste Storage Area.
5) Unit has removed flexible pipeline from ETP area and provided fix pipeline among the ETP units.
6) No Leakages/spilled wastewater found in ETP area during the inspection.
7) Unit has installed flow meter at ETP inlet.
8) During visit, STP was found in working condition.
9) Unit has provided logbook for the operation of ETP & STP and assured to maintain the same.
10) Unit has provided fix pipeline with pump facility in collection pit near main gate to the ETP.
11) Unit has RCC flooring in to entire premises and provided collection pit near main gate for collection of contaminated run off/emergency spillage.

Under the circumstances, **I Dr. S. N. Agravat, Unit Head-Bharuch**, Gujarat Pollution Control Board is directed to revoke the closure directions issued vide letter no. GPCB GPCB/BRCH/CCA-1636(3)/ID-84022/890855, dated 09/01/2026 to your industrial plant **for THREE MONTH** with following conditions:

1) Unit shall comply with submitted notarized undertaking dated 12/01/2026.
2) Unit shall comply with CCA conditions.
3) Unit shall dispose collected contaminated effluent and soil stored within premises in environmentally sound manner and submit evidence to the Board.
4) Unit shall connect online analyser with GPCB/CPCB server.

This order is issued after obtaining approval from competent authority of the Board.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(Dr. S. N. AGRAVAT)
UNIT HEAD-BHARUCH

NO: GPCB/BRCH/CCA-1636(3)/ID-84022/ **DT: /01/2026**

Issued to:
M/s. Shlokka Dyes Private Limited,
Plot No.: C-54, GIDC Saykha,
Ta: Vagra, Dist.: Bharuch.

Copy to:

1) **The Superintendent Engineer (O&M)**
   Circle Office,
   Dakshin Gujarat Vij Co Ltd,
   Maktampur Road, Bharuch.
2) **The Executive Engineer (O&M)**
   Circle Office,
   Dakshin Gujarat Vij Co Ltd,
   Maktampur Road, Bharuch.
3) **The Deputy Engineer (O&M)**
   Circle Office,
   Dakshin Gujarat Vij Co Ltd
   Maktampur Road,
   Bharuch.....I am directed to request you to **RE-CONNECT ELECTRICITY SUPPLY** of **M/s. Shlokka Dyes Private Limited,** Plot No.: C-54, GIDC Saykha, Ta: Vagra, Dist.: Bharuch **FOR THREE MONTHS** from the date of issue of this order.

GUJARAT POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

4) **The Deputy Executive Engineer (Drainage),**
First Floor, Narmada Commercial Complex,
Panchbatti, GIDC,
Bharuch..... I am directed to request you to **RE-CONNECT WATER SUPPLY** of **M/s. Shlokka Dyes Private Limited,** Plot No.: C-54, GIDC Saykha, Ta: Vagra, Dist.: Bharuch **FOR THREE MONTHS** from the date of issue of this order.

5) **The Regional Officer,**
Gujarat Pollution Control Board,
Regional Office,
Bharuch..... to follow up for compliance of this direction & send IR/AR.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(Dr. S. N. AGRAVAT)
UNIT HEAD-BHARUCH

Gujarat Pollution Control Board

C-1/119/3,GIDC,Phase-II, Narmadanagar, BHARUCH-392 015. Phone : (02642) 246333
Email : ro-gpcb-bhar@gujarat.gov.in Web site : www.gpcb.gujarat.gov.in

BY Speed Post

SHOW CAUSE NOTICE

WHEREAS you Sejal Chem Tech Industries are having industrial plant located at, Plot No. C-154, GIDC Estate Saykha, TAL: Vagra, DIST: Bharuch – 392160.

AND WHEREAS, the board officer had visited unit on dated 18/12/2025 and following non-compliance were observed:-

- Unit has not provided flow meter on inlet of ETP, MEE feed, MEE condensate, RO permeate.
- At the time of the inspection hazardous waste storage area was found to be almost full.

NOW THEREFORE, in exercise of the powers vested with this Board Under Section 33-A of the Water (Prevention and Control of Pollution) Act-1974, notice is hereby served on you, to show cause notice within 15 days from the date of receipt of this show cause notice in view of the non-compliance observed above and why legal action should not be initiated as per the provision of the Acts.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(K.N.VAGHAMSHI)
REGIONAL OFFICER, BHARUCH.

Outward No. GPCB/RO-BRCH/ID-75544/8239 DT. 03/01/2026

To,
Sejal Chem Tech Industries
Plot No. C-154, GIDC Estate Saykha,
TAL: Vagra, DIST: Bharuch – 392160.

Gujarat Pollution Control Board

C-1/119/3,GIDC,Phase-II, Narmadanagar, BHARUCH-392 015. Phone : (02642) 246333
Email : ro-gpcb-bhar@gujarat.gov.in Web site : www.gpcb.gujarat.gov.in

BY Speed Post

SHOW CAUSE NOTICE

WHEREAS you Aries Color Chem Pvt. Ltd. are having industrial plant located at, Plot No. DP-56/57, Saykha Industrial Estate, Tal: Vagra, Dist: Bharuch-392130.

AND WHEREAS, the board officer had visited unit on dated 17/12/2025 and following non-compliance were observed:-

- Digital display Board as per CPCB guideline is not provided.
- Unit has not made proper nomenclature in ETP tanks with capacity & put flow diagram in ETP area.
- Unit has not provided flow meter at ETP inlet (for low COD).
- Online analyzer connectivity with GPCB/CPCB server is not done.
- Huge quantity of sludge found stored in storage area, housekeeping behind H acid plant (LSP yard) is found poor.
- In plant area, scrubber area leakages of pumps are observed and due to this these area housekeeping was found poor.

NOW THEREFORE, in exercise of the powers vested with this Board Under Section 33-A of the Water (Prevention and Control of Pollution) Act-1974, notice is hereby served on you, to show cause notice within 15 days from the date of receipt of this show cause notice in view of the non-compliance observed above and why legal action should not be initiated as per the provision of the Acts.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(K.N.VAGHAMSHI)
REGIONAL OFFICER, BHARUCH.
DT. 03/01/2026

Outward No. GPCB/RO-BRCH/ID-65170/8240

To,
Aries Color Chem Pvt. Ltd.
Plot No. DP-56/57, Saykha Industrial Estate,
Tal: Vagra, Dist: Bharuch-392130.

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

GPCB

SPEED POST

NOTICE OF DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974 (HEREINAFTER REFERRED TO AS THE "WATER ACT") AS AMENDED FROM TIME TO TIME.

WHEREAS you **M/s. Gujarat Industrial Development Corporation (CETP Saykha)** are having an CETP at Plot no. Saykha Part-1, E-9 to E-13, E-15 to E-17, E-32 to 37, Saykha Industrial Estate, Ta. Vagra, Dist. Bharuch

AND WHEREAS Gujarat Pollution Control Board had granted CCA (AWH-116130) valid up to 05/07/2026 for operation of CETP subject to compliance of conditions mentioned therein.

AND WHEREAS during the inspection of your CETP & Saykha Industrial area on 06/12/2025 and 18/12/2025 under Section - 23 of the Water Act by the authorized officers of the Board it has been observed that:

1. During visit, only primary treatment and Oxidation Ditch – 1 system is found working and rest of the treatment are observed not in operation
2. CETP has not submitted details regarding effluent received and treatment in CETP.
3. During visit, equalization tank 1 & 2 is almost full and about to overflow if inflow waste water is not stopped.
4. Unit has provided online analyser at inlet and outlet line but found not working during visit.
5. Unit has not furnished details regarding last three-month effluent received, disposal, chemical consumption, haz. Waste generation-disposal details during visit.
6. CETP has not provided Digital display Board is also not provided as per CPCB guideline.
7. CETP has maintained record in log sheet for CETP operation but it is not proper
8. Unit has provided online analyzer on CETP outlet/ discharge line for parameter TOC, COD, TN, pH meter which is found not in operation during inspection.
9. CETP has not furnished last one year effluent inlet – discharge effluent, chemical dosing, and hazardous waste generation-disposal details during visit.
10. Analysis result of the sample collected during visit Dtd. 06/12/2025 shows: 1) w/w sample collected from final outlet of CETP shows: COD: 950 mg/l, BOD: 165 mg/l, NH3-N: 124.19 mg/l, Color: 5000 Pt.Co.Sc, 2) W/w Sample Collected from Inlet Chamber shows: COD: 7033 mg/l, BOD: 1586 mg/l, NH3-N: 258.16 mg/l and Color: 2000 Pt.Co.Sc, which is found higher than permissible norms.
11. Analysis results of the sample collected during visit Dtd. 18/12/2025 shows: 1) Sample collected from CETP inlet (equalization tank) shows: 1) Color: 3500 Pt.Co.Sc. and 2) Sample collected from CETP outlet (treated w/w holding cum discharge tank) shows: Color: 2500Pt.Co.Sc. and COD: 299 mg/l, which is found higher than permissible norms.
12. GIDC has not complied with earlier issued Notice of Direction Dtd. 18/10/2025.
13. GIDC has not responded to written instructions provided during the site inspection.

Now, therefore I Dr. S. N. Agravat, Unit Head - Bharuch proposes to issue Direction under Section (33) (A) of the Water (Prevention and Control of Pollution) Act-1974 as under:

1. Why not to issue direction under section 33-A of the Water (Prevention and control of pollution) Act – 1974 to prohibit you from manufacturing activity?

2. Why not to direct to concern authority for disconnection of Power Supply & Water Supply of your industrial plant?
3. GIDC shall submit time bound action plan for following issues:
   a) GIDC shall ensure CETP shall function properly meet the prescribed standards meets in the CCA.
   b) GIDC shall display the names of member units and discharge quantity at each pumping station with their effluent quantity.
   c) GIDC Shall remove old underground lines/network after shifting above ground discharge line in to new Sub Pumping Stations.
   d) GIDC shall complete the work of the proposed 90 MLD Vilayat-Dahej discharge pipeline as soon as possible so that the treated w/w of the industries of Vilayat and Saykha can be disposed of easily and submit time bound action plan for the same.
   e) GIDC shall monitor and regulate waste water flow from member units to maintain proper treatment efficiency and co-ordinate with member industries to ensure proper waste water discharged.
   f) GIDC shall lift all contaminated effluent /waste water from identified location and sent it for treatment in CETP.
   g) GIDC shall assesses infrastructure to facility simultaneous discharge from the CETP outlet and the Vilayat pumping station to avoid leakages from conveyance pipeline and necessary maintenance /up gradation shall be carryout.

You are hereby directed to reply & submit compliance of above points within 15 days from the date of serving of this notice failing which, it shall be presumed that you have nothing to say in this matter and appropriate action will be initiated against you for the conduct of the business of your activity, under the Water Act-1974 for above non-compliance.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(Dr. S. N. AGRAVAT)
UNIT HEAD-BHARUCH

NO: GPCB/BRCH-CCA-285/ID:71763/ Date: /01/2026

Issue to:
M/s. Gujarat Industrial Development Corporation (CETP Saykha)
Plot no. Saykha Part-1, E-9 to E-13, E-15 to E-17, E-32 to 37,
Saykha Industrial Estate,
Ta. Vagra, Dist. Bharuch-392140.

Copy To:
- **Regional Officer,**
  Gujarat Pollution Control Board,
  Regional Office,
  Bharuch..... For monitoring & verification of compliance.