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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONAL BENCH AT PUNE**

ORIGINAL APPLICATION NO. 30 OF 2023

IN THE MATTER OF:

Aryavart Foundation

...Applicant

VERSUS

M/s Coromandel International Ltd. & Ors.

...Respondents

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Through:



Dr. S. S. Hooda

Advocate for the Applicant

B-40, LGF, South Extension-II

New Delhi-110049

Mobile No.:+91-9868280166

E-mail id:sshooda65@gmail.com

PLACE: NEW DELHI

DATED:01.04.2024

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**ADDITIONAL AFFIDAVIT ON BEHALF OF THE
APPLICANT**

MOST RESPECTFULLY SHOWETH:

I, Ashutosh Rameshbhai Mishra, S/o Dr. Rameshbhai Mishra, aged about 40 years, R/o Flat No. 103, 1st Floor, Green Valley Residence, Dindooli, Choryashi Taluk, Surat, presently at New Delhi, do hereby solemnly affirm and declare as under.

1. That I am the President of the Applicant Foundation in the captioned matter and well aware of the facts and circumstances of the case and competent to affirm the Affidavit.
2. That the Original Application was filed seeking the following reliefs inter-alia;
 - a. *Direct the closure of Respondent No. 1 forthwith till its CC&A is renewed; and*
 - b. *Pass an order imposing special and punitive damages against Respondent No. 1 towards restoration and restitution of the environment; and*
 - c. *Direct Respondent No. 2 to initiate appropriate prosecution against the Respondent No. 1 and other concerned persons as prescribed by the law; and*



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- d. *Direct Respondent No. 2/GPCB to disclose the list of Industries operating without a valid Consolidated Consent and Authorization (CC&A); and*
- e. *Issue appropriate directions/orders against the industries which are operating without a valid Consolidated Consent and Authorization (CC&A) in violation of the provisions of the Environment (Protection) Act, 1986 and the Rules and Notifications issued thereunder;*
3. That the Respondent No. 1 admitted in as much that they were operating without a valid CC&A and had duly applied for its renewal however the renewal was rejected.
4. That on 04.10.2023, this Hon'ble Court while hearing the captioned matter, had made the following observation with regards to the renewal of the CC&A granted to the Respondent No. 1

10. From the side of respondent No.1, provisional CC&A, which was granted on 03.10.2023 for a period of five years, has been provided by the learned counsel for respondent No.1 and we have taken these documents on record. Therefore, according to this, there is no gap in CC&A. We also require an answer to this from the side of GPCB as well as the applicant. They may file their affidavits in this regard by the next date.

5. That for better appreciation of the issue, a brief chronological timeline of events is necessary, the same is set forth below;

22.02.2017	The Respondent No. 1 (R-1) is granted Consolidated Consent and Authorization (CC&A) granted vide Order 22.02.2017
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	which was valid upto 30.09.2021. (Ann. A-2, pg. 29).
08.03.2021	R-1 applied for renewal of CC&A
20.10.2021	R-1's application for renewal was rejected by the GPCB for various reasons. (Ann. R-8, pg. 259)
29.07.2022	R-1 applied afresh for renewal of CC&A which was also rejected by the GPCB for various reasons (Ann. R-9, pg. 260) It is to be noted that as per the rejection order, the Application for renewal was received on 11.10.2021
21.08.2022	R-1 applied for renewal of CC&A for a 3 rd time (Ann. R-10, pg. 261)
03.10.2023	The GPCB issued CC&A which is valid till 30.09.2026. That interestingly, the CC&A mentions "Board has received on line consolidated application inward ID No:286059 dated 18/08/2023 for the consolidated consent and authorization (CC & A)" A True Copy of the CC&A dated 03.10.2023 is annexed herewith and marked as Annexure A .



6. That prima facie, the following facts emerge from an appreciation of the timeline appearing from the documents of the GPCB;

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- i. That R-1 CC&A expired on 30.09.2021; the same is evident from Ann. A-2
 - ii. That R-1's Application for renewal of CC&A was rejected twice; this is evident from Ann. R-8 and R-9.
 - iii. That R-1's 3rd Application i.e. Application dated 21.08.2022 (**Ann. R-10**) was also seemingly rejected since the fresh CC&A states that the GPCB has received Application on 18.08.2023.
 - iv. That the CC&A has been granted only on 03.10.2023
 - v. That between the period of 01.10.2021 to 02.10.2023, i.e. 2 years, the Respondent No. 1 operated without valid consents/authorization mandatorily required under the Water (Prevention & Control of Pollution) Act, 1974 ('Water Act'), the Air (Prevention & Control of Pollution) Act, 1981 (Air Act) and the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 ('HWM Rules').
7. That the issues which thus arise for consideration of this Hon'ble Tribunal are:
- i) Whether GPCB ought to have directed Respondent No. 1 to stop its operations immediately on expiry of CC&A or at least when the grant of CC&A was rejected for the first time or second time?



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- ii) Whether the GPCB has the power to issue ex-post facto consent/authorization under the Water Act, the Air Act and the HWM Rules? If yes, under what Rules and whether the same could be done without imposing penalty for operating without consent/authorization for a period of two years?
8. That it is also apposite to mention herein that the Applicant also appreciates that the issue of ex-post facto clearances is not alien to environmental jurisprudence of India, however the same cannot be without imposition of penalty for operating without CC&A.
9. The Hon'ble Supreme Court, while discussing the issue of grant of ex-post facto Environmental Clearance in *Electrosteel Steels Limited vs. Union of India* (2023) 6 SCC 615, held that ex post facto EC should ordinarily not be granted, and certainly not for the asking and at the same time ex post facto clearances and/or approvals and/or removal of technical irregularities in terms of a Notification under the EP Act cannot be declined with pedantic rigidity, oblivious of the consequences of stopping operations.
10. That however, the issue herein is different, the Respondent has a valid EC, however the renewals of consent/authorization required to operate under various Acts was rejected numerous times and the Respondent operated without the statutorily required consent/authorization for 2 years i.e. from 01.10.2021 to 02.10.2023.



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11. That another issue which merits consideration is that whether the GPCB ought to have granted CC&A to the Respondent No. 1 when this Hon'ble Tribunal was seized of the matter wherein it is evident beyond any doubt that the Respondent No. 1 was operating without the statutorily required consent/authorization for 2 years.

12. That this Hon'ble Tribunal may therefore call for a comprehensive Affidavit from the GPCB on the issues highlighted in Para 7 and 11 of this Affidavit for better appreciation of the controversy.

13. That the Hon'ble Tribunal may also consider applying the ratio of ex-post facto Environmental Clearance to the situation arising herein subject to imposing appropriate penalty on the Respondent for the period it continued its operations without valid consent/authorization under the Water Act, the Air Act and the HWM Rules.



Identify the Executant/Deponent who has appeared in my Presence

VERIFICATION

Verified at New Delhi on this 01 day of APR 2024 that the contents of the Affidavit are true and correct to the best of my knowledge and belief and no part of this Affidavit is false and

nothing material has been concealed therefrom.

Asst. Com. Pawan Dhai Mishra
Nav Anjan Man.

DEPONENT

DEPONENT

CERTIFIED THAT THE DEPONENT
S/o, W/o, D/o
Identified by Shri
has solemnly affirmed before me
Delhi on SL. No.
that the contents of the affidavit have
been explained to him/her & same are true and correct
to His/her Knowledge.

Oath Commissioner

01 APR 2024



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GUJARAT POLLUTION CONTROL BOARD

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

BY RPAD

In exercise of the power conferred under section-25 of the Water (Prevention and Control of Pollution) Act-1974, under section-21 of the Air (Prevention and Control of Pollution) Act-1981 and Authorization under the Hazardous and Other Waste (Management and Transboundary Movement) Rules'2016, framed under the Environment (Protection) Act-1986.

And whereas Board has received on line consolidated application **inward ID No: 286059 dated 18/08/2023** for the consolidated consent and authorization (CC & A) of this Board under the provisions / rules of the aforesaid Acts Consent & Authorization is hereby granted as under.

CONSENT AND AUTHORISATION:

(Under the provisions / rules of the afore said environmental acts)

To,

M/s. Coromandel International Limited.
Plot No. 2102, 2104/1, 735 & 2112/2113,
GIDC Sarigam,
Tal. Umbergaon, Dist. Valsad – 396 155,

- 1. Consent Order No: AWH- 129444 Date of Issue: 03/10/2023**
- The consent shall be valid up to **30/09/2026** for the use of outlet for the discharge of treated effluent and emission due to operation of industrial plant for the following products:

Sr. No.	Name of the Products	Quantity (MT/Annum)	Remarks
GROUP A			
1	Mancozeb (Tech.)	38000	Either or combination of the products
2	Mancozeb (Tech.) + Maneb (Tech.)	38000	
3	Mancozeb (Tech.) + Zineb (Tech.)	38000	
4	Mancozeb (Tech.) + Propineb (Tech.)	22116	
	Total Production capacity of Group A	38000	
GROUP B			
1	Diethyl Thiophosphoryl Chloride (DETC)	3600	Either or combination of the products
2	DMTC	2160	
3	Diafenthuron	1650	
4	Thiamethoxam	1650	
5	Pymetrozine	1650	
6	Diflubenzuron	1650	

	Total Production capacity of Group B	3600	
GROUP C			
1	DMTC Amide	4796	--
	Total Production capacity of Group C	4796	
GROUP D			
1	Glyphosate (Tech.)	5000	Either or combination of the products
2	PMIDA	3300	
	Total Production capacity of Group D	5000	
GROUP E			
1	Chlorpyrifos (Tech.)	5000	--
	Total Production capacity of Group E	5000	
GROUP F			
1	Acephate (Tech.)	7000	--
	Total Production capacity of Group F	7000	
GROUP G			
1	Monocrotophos (Tech.)	7000	Either or combination of the products
2	Dicrotophos (Tech)	1485	
	Total Production capacity of Group G	7000	
GROUP H			
1	DDVP (Tech.)	6000	--
	Total Production capacity of Group H	6000	
GROUP I			
1	Phosphorous Trichloride (PCl ₃)	13000	--
	Total Production capacity of Group I	13000	
GROUP J			
1	Trimethyl Phosphite (TMP)	9240	Either or combination of the products
2	Triethyl Phosphite (TEP)	5940	
	Total Production capacity of Group J	9240	
GROUP K			
1	Phosphorous Sulphochloride (PSCl ₃)	2000	--
	Total Production capacity of Group K	2000	
GROUP N			
1	2-(4-Hydroxy phenoxy) Propionic Acid	429	Either or combination of the products
2	2,3-Difluoro-5-chloro pyridine	353	
3	Clodinafop propargyl (Tech.)	933	



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4	Triclopyr Acid (Tech.)	933	
5	Triclopyr Butotyl Ester (Tech.)	933	
6	Picloram (Tech.)	495	
7	Pretilachlor (Tech.)	933	
8	Bispyribac sodium (Tech.)	330	
9	Azoxystrobin	52.8	
10	Boscalid	660	
11	Metalaxyl	933	
12	Proclaraz	933	
	Total Production capacity of Group N	933	
GROUP O			
1	5-Amino-3-cyano-1-(2,6-dichloro-4-trifluoro methyl phenyl) Pyrazole	861	
2	Fipronil (Tech.)	933	
3	Emmamectin Benzoate (Tech.)	495	
4	Difenoconazole (Tech.)	660	
5	Triazophos (Tech.)	933	
6	Glufosinate Ammonium Salt	933	
7	Metribuzin	933	
	Total Production capacity of Group O	933	
GROUP P			
1	Imidacloprid (Tech.)	990	All of the products
2	Acetamiprid (Tech.)	990	
	Total Production capacity of Group P	990	
Total Production capacity of all Group sand By-Product		103492	

LIST OF FORMULATION PRODUCT

Sr. No.	FORMULATION PRODUCTS	Qty. MT/Annum
1	Mancozeb 80% WP	26400
2	Mancozeb 75% WP/WDG	28050
LIQUID FORMULATIONS		
1	Glyphosate 41% IPA	34650
2	Glyphosate 62% IPA	26136
3	Monocrotophos 36% SL	7920
4	Acephate 75% SP	8514
5	Chloropyriphos 20% EC	15840

6	Mancozeb SC (420-600 gm/Ltr)	3300
7	Mancozeb SE (420-500 gm/lit)	3300
8	Mancozeb OS 600 gm/lit	3300
9	Mancozeb (63%)+Carbendazim(12%)	1650
10	Mancozeb (64%)+ Metalyxyl (8%)	1650
11	Mancozeb (64%)+ cymoxanil (8%)	1650
12	Glyphosate 71% ammonium salt(prills)	4620
13	Glyphosate 5% ammonium salt	6600
14	Monocrotophos 40% SL (W/V)	2640
15	Diclorovos 76% EC	1980
16	Acephate 40% SL	1650
17	Acephate 75% prills	660
18	Acephate 95% prills	660
19	Chloropyriphos 38.7% EC	1650
20	Chloropyriphos 480 gm/lit EC	1650
21	Chloropyriphos 50% EC	1650
22	Chloropyriphos 50% + Cypermethrine 5% EC	1650
23	Cypermethrin 10% EC	1650
24	Cypermethrin 25% EC	1650
25	Maneb 80% WP	8910
26	Propineb 70% WP	9240
27	Zineb 80% WP	8910
28	Triclopyr Butotyl ester 480 gm/lit	990
29	Methamidophos 600 gm/lit SL	5280
30	Imidaclopyrid 17.8% SL	8580
31	Clodinafop propargyl 15% WP	10230
	Total	243210

SUBJECT TO FOLLOWING SPECIFIC CONDITIONS:

1. Industry shall comply with conditions of Environment Clearance.
2. Unit shall submit hazardous waste annual return regularly.
3. Unit shall adopt and regularly use the online manifest system for procurement & disposal of Hazardous waste.

3. CONDITIONS UNDER WATER ACT 1974:

3.1 Source of Water: - GIDC Water Supply.

3.2 The quantity of total water consumption shall not exceed **1078 KL/Day** as per below break up

- a) Industrial: **1003 KL/Day.**
- b) Domestic: **75 KL/Day. (Domestic: 60 KL/Day + Gardening: 15 KL/Day)**



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3.3 The quantity of total of waste water generation shall not exceed **1013.73 KL/Day** as per below break up

- a) Industrial: **953.73 KL/Day.**
- b) Domestic: **60 KL/Day.**

3.4 The final treated @ 93.83 KL/day toxic stream sent to CMEE, @ 669.5 KL/Day concentrated stream treated in MEE 190.4 KL/day dilute stream + 60 KL/day domestic wastewater + 330.6 KL/day MEE condensate i.e. total 581 KL/day treated in ETP & discharge in to CETP Sarigam.

Trade Effluent

3.5 The quality of industrial effluent shall confirm to the following standards: (Whichever is applicable)

PARAMETERS	CETP inlet Norms
pH	6.5 to 8.5
Temperature	40° C
Colour (pt.co. scale) in units	100 units
Suspended Solids	100 mg/l
Oil and Grease	10 mg/l
BOD (3 days at 27° C)	400 mg/l
COD	1000 mg/l
Chlorides	600 mg/l
Sulphate	1000 mg/l
Ammonical Nitrogen	50 mg/l
Phenolic Compounds	1 mg/l
Arsenic	0.2 mg/l
Total Chromium	2 mg/l
Hexavalent Chromium	0.1 mg/l
Copper	3 mg/l
Lead	0.1 mg/l
Mercury	0.01 mg/l
Nickel	3 mg/l
Zinc	5 mg/l
Cadmium	2 mg/l
Fix Dissolved Solids	2100 mg/l

- All efforts shall be made to remove colour & unpleasant odour as far as practicable.

3.6 The final treated effluent confirming to the above standards shall be discharged into CETP, Sarigam for further treatment and disposal.

- 3.7 The applicant shall make the arrangement for holding the effluent for 48 hrs. in case of failure of / non operation of CETP, Sarigam Clean Initiative.
- 3.8 Industry shall provide fixed pipelines network with flow meter for conveyance of treated effluent & maintain records in this regard.
- 3.9 The GIDC drainage connection given by the GIDC for discharge of industrial effluent shall be disconnected & the outlet shall be sealed.
- 3.10 Domestic waste water shall be disposed off through septic tank/soak pit system.
- 3.11 Disposal system for storm water shall be provided separately. In no circumstances storm water shall be mixed with the industrial effluent.

4. CONDITIONS UNDER AIR ACT 1981:

- 4.1 Following shall be used as fuel in Melting Furnace and Annealing Furnace respectively;

Sr. No.	Fuel	Quantity
1	Natural Gas	2500 SCM/Hr (Approx)
2	LDO	2 KL/Hr
3	Natural Gas	1000 SCM/Hr
4	HSD	6 KL/Day

- 4.2 The applicant shall install & operate air pollution control system efficiently in order to achieve prescribed norms.
- 4.3 The flue gas emission through stack attached to stack shall conform to the following standards:

Stack No.	Stack attached to	Stack height Meter	APCM	Parameter	Permissible Limit
1	Boiler 3Nos.	50	--		
2	D. G. Set – 01 Nos. (1000KVA)	12	--		
3	D. G. Set – 2Nos. (500KVA)	12	--	PM SO ₂ NO _x	150 mg/Nm ³ 100 ppm 50 ppm
4	D. G. Set – 01Nos. (200KVA)	12	--		
5	Liquid and Gas Incinerator 01	52	--	PM SO ₂ NO _x HCL	50 200 400 50
6					



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Solid Incinerator Incinerator 03	CO Total OrganicCarbon Total Dioxinsandfurans Sb+As+Pb+Cr+CO+Cu+Mn+Ni+V	100 20 0.2 mg TEQ/ Nm ³ 1.5
--	--	--

4.4 The process emission through Pickling Section shall Conform to the following standards:

Sr. No.	Plant	Stack attached to	Stack height Mtr.	APCM	Parameter	Permissible limit, Mg/nm ³	Remarks
1	GROUP A						
	Mancozeb	1)Mancozeb reactor – 01 Nos- 20 KL	30	Air Blower/ Air Ventry	CS2 PM SO2	180 50 40	Either or combination of the products
	Mancozeb + Maneb	2) Maneb reactor 01 Nos- 20 KL					
	Mancozeb + Zineb	3) Zineb reactor Nos- 20 KL					
	Mancozeb + Propineb	4) Propineb Reactor – 01 Nos – 14 KL					
		5) Spray Dryer - 3 Nos.	30	Bag filter / Water Scrubber			
2	GROUP B						
	Diethyl Thiophosphoryl Chloride (DETC) or DMTC	Reactor-01 Nos –10 KL	20	Alkali scrubber	HCl	20	Either or combination of the products
	Diafenthuron (Tech.)	Reactor -01 Nos – 6.3 KL	20	Alkali scrubber	HCl	20	
	Thiamethoxm	Reactor -01 Nos – 6.3 KL	No stack				
	Pymetrozine	Reactor – 01 Nos – 6.3 KL	20	Alkali scrubber	HCl	20	
	Diflubenzuro	Reactor –					

	n	01 Nos – 6.3 KL	20	Alkali scrubber	HCl	20	
3	GROUP C						
	DMTC Amide	Reactor -01 Nos – 10 KL	20	Acidic scrubber	NH3	30	
4	GROUP D						
	Glyphosate (Tech.)	Reactor – 2 nos -10 KL each	20	1st Scrubber Water scrubber 2nd with Acid Media	NH3	30	Either or combinati on of the products
	PMIDA	Reactor -01 Nos – 10KL	20	Alkali scrubber	HCl	20	
5	GROUP E						
	Chlorpyriphs (Tech.)	HTCP Reactor –01 Nos-6.0 KL	20	Two scrubber in series-water scrubber & alkali scrubber	HCl	20	
6	GROUP F						
	Acephate (Tech.)	Ammonia solution preparation reactor – 01 Nos –04 KL	20	1 st Scrubber Water scrubber 2 nd with Acid Media	NH3	30	
		Acephate Packing Area	12	Water Scrubber	Odour	Nil	--
7	GROUP G						
	Monocrotoph os (Tech) OR	Chlorinatin Reactor –01 Nos – 6.3 KL and	20	Two scrubber in series-water scrubber & alkali scrubber	HCl Cl2	20 9	Either or combinati on of the products
	Dicrotophos (Tech.)	Neutralizer Reactor –01 nos. -12 KL					
	GROUP H						
	DDVP	Gas to Incinerator – 01		--	CH3Cl		--
8	GROUP I						
	Phosphorous	PCl3 Plant	11				



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	Trichloride (PCl ₃)	reactor & Storage tank		Alkali Scrubber	HCl Cl ₂ PCl ₃	20 9 9	
9	GROUP J						
	Trimethyl Phosphite (TMP) OR Triethyl Phosphite (TEP)	1) TMP/TEP plant reactor – 01 Nos – 3 KL	20	1st Scrubber Water scrubber 2nd with	NH ₃	30	Either or combination of the products
		2) TMP/TEP products storage tanks – 02 Nos -40 KL	11	Acid Media Acid scrubber/Carbon tower	Odor	Nil	
10	GROUP K						
	Phosphorous Sulphochlorie (PSCl ₃)	PSCl ₃ plant reactor – 01 Nos – 6.3 KL and storagetank 01Nos10KL	22	Alkali Scrubber	HCL PCl ₃	20 9	
11	GROUP N						
	2-(4-Hydroxy phenoxy) Propionic acid	Reactor –01 Nos – 6.3 KL		No process stack			Either or combination of the products
	2,3-Difluoro-5-chloro pyridine	Reactor –01 Nos – 6.3 KL		No process stack			
	Clodinafop Propargyl	Reactor –01 Nos – 6.3 KL		No process stack			
	Pyrazosulfuron Ethyl	Pyrazosulfuron Ethyl reactor	20	Alkali Scrubber	HCl	20	
	Pretilachlor	Reactor –01 Nos – 6.3 KL		No process stack			
	Bispyribac Sodium	Reactor – 01 Nos – 6.3 KL		No process stack			
	Azoxystrobin	Reactor – 01 Nos – 6.3 KL		No process stack			

	Boscalid	Reactor – 01 Nos –6.3 KL	20	Alkali Scrubber	HCl	20	
	Metalaxyl	Metalaxyl Reactor – 01Nos–6KL	20	Alkali Scrubber	HCl	20	
13	GROUP O						
	5- amino-3- cyano-1-(2,6- dichloro-4- trifluoro methyl phenyl) pyrazole	Reactor –01 Nos – 6.3 KL		No process stack			Either or combinati on of the products
	Fipronil	Fipronil reactor – 01 Nos – 6.3 KL	20	Alkali Scrubber	HCl	20	
	Emmamectin Benzoate	Reactor –01 Nos – 6.3 KL		No process stack			
	Difenoconazo le	Reactor –01 Nos – 6.3 KL		No process stack			
	Triazophos	Reactor –01 Nos – 6.3 KL		No process stack			
	Glufosinate Ammonium Salt	Reactor –01 Nos – 6.3 KL		No process stack			
	Metribuzin	Reactor –01 Nos – 6.3 KL		No process stack			
14	NH4Cl	NH4Cl Storage Tank	11	Acid Scrubber			
15	Solvent Exhaust	All common vents	26	Carbon Absorption Tower	Solvent		
16	HCl Storage Tank	HCl Storage Tank – 01 Nos – 20 KL	11	Alkali Scrubber	HCl Cl2	20 9	
17	Chlorine	Chlorine	13.5	Alkali	Cl2	9	



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	Shed	Shed - 01. Nos		Scrubber			
18	Drum Filling Station	Drum Filling Station - 01 Nos	11	Alkali Scrubber	Odor		
19	Sodium Sulphate recovery	Stack attached to Dryer	20	Bag filter	PM	150	
20	Ammonium Chloride recovery	Stack attached to Dryer	20	Bag filter	PM	150	
21	Quippo (1.364 MW)	Stack attached to Power plant	45	---	PM SO2 NOX	150 100 50	
22	Incinerators - 03 Nos - 2 Stacks	1 Gas Waste, 1 Liquid Waste & 1 Solid Waste	52	Ventury Alkali Scrubber	PM SO2 NOX	50 200 400	

4.5 Ambient air quality within the premises of the industry shall conform to the following standards:-

PARAMETERS	PERMISSIBLE LIMIT	
	Annual	24 Hrs Average
Particulate Matter-10 (PM ₁₀)	60 Microgram/m ³	100 Microgram/m ³
Particulate Matter- 2.5 (PM _{2.5})	40 Microgram/m ³	60 Microgram/m ³
SO ₂	50 Microgram/m ³	80 Microgram/m ³
NO _x	40 Microgram/m ³	80 Microgram/m ³

5. **AUTHORIZATION UNDER THE HAZARDOUS AND OTHER WASTES (MANAGEMENT AND TRANSBOUNDARY MOVEMENT) RULES, 2016 SHALL BE AMENDED AS;**

5.1 M/s. Coromandel International Limited, is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at Plot No. 2102, 2104/1, 735 & 2112/2113, GIDC Sarigam, Tal. Umbergaon, Dist. Valsad - 396155.

Sr. No.	Waste	Schedule & Cat.	Quantity	Mode of disposal
1	ETP Sludge	I-35.3	2640 MT/Year	Collection, storage, transportation, disposal at TSDF site or for co-processing.
2	Discarded Container/bags	I-33.3	24000 Nos./Year	Collection, storage, decontamination, storage, disposal by selling to GPCB approved re conditioners disposed through common GPCB approved decontamination facility.
3	Oil & Grease skimming residue	I-36.4	32.40 MT/Year	Collection, storage, transportation, disposal at common incinerator facility or co-processing/ Preprocessing.
4	Chemical Sludge containing residue pesticides	I-29.2	2145 MT/Year	Collection, storage, transportation, disposal at common hazardous waste incinerator facility or co-processing/Preprocessing.
5	Used Oil	I-5.1	0.3 MT/Year	Collection, storage, transportation, disposal by selling to registered recyclers.
6	Spent carbon	I-38.2	257.4 MT/Year	Collection, storage, transportation, disposal at common incinerator facility or for co-processing/ Preprocessing.
7	Ash from incinerator	I-37.2	4755 MT/Year	Collection, storage, transportation, disposal at TSDF site
8	Sludge from wet scrubber	I-37.1	0.240 MT/Year	Collection, storage, transportation, disposal at common incinerator facility TSDF site & for co-processing.
9	Spent HCl 30% Acetic Acid 30%	I-29.6	24588 MT/Year 7000 MT/Year	Collection, storage, Transportation, Reuse, or disposal by in-house utilization.
10	Organic residue	I-29.1	2032 MT/Year	Collection, storage, transportation, disposal at common incinerator facility or for co-processing/Preprocessing.
11	Salts from MEE	I-37.3	4570.44 MT/Year	Collection, storage, transportation, disposal at common incinerator facility TSDF site.
12	Spent solvents i.e. MDC, EDC, EA, CPN etc.	I-29.4	1995 MT/Year	Collection, storage, transportation, disposal by selling to actual end user who have valid permission under Rule-9 of hazardous waste and other waste (M) and (TMB) rule-2016 or Co-processing/Preprocessing
13	Date expired and off-specification on residues	I-29.3	50 MT/Year	Collection, storage, transportation, disposal through common incineration facilities.

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152



14	Ammonium Chloride powder (NH ₄ Cl) (MEE Salt)	I-37.3	13398 MT/Year	Collection, storage, Transportation, disposal at Common TSDF Site.
15	Sodium Sulphate (Na ₂ So ₄) (MEE Salt)	I-37.3	19779 MT/Year	Collection, storage, Transportation, disposal at Common TSDF Site.
16	Ammonium Sulphate ((NH ₄) ₂ SO ₄) (MEE Salt)	I-37.3	8370 MT/Year	Collection, storage, Transportation, disposal at Common TSDF Site.

5.2 The authorization shall be valid up to **30/09/2026**.

5.3 The authorization is subject to the conditions stated below and such other conditions as may be specified in the rules form time to time under the Environmental (Protection) Act-1986.

5. GENERAL CONDITIONS UNDER HAZARDOUS AND OTHER WASTES (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES-2016.

- 5.1 The Authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
- 5.2 The Authorization or its renewal shall be produced for inspection at the request of an officer Authorized by the State Pollution Control Board.
- 5.3 The person Authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization.
- 5.4 Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
- 5.5 The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
- 5.6 The person authorized shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty"
- 5.7 It is the duty of the authorized person to take prior permission of the State Pollution Control Board to close down the facility.
- 5.8 The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
- 5.9 The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
- 5.10 The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilization of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorization.
- 5.11 The importer or exporter shall bear the cost of import or export and mitigation of damages if any

- 5.12 An application for the renewal of an authorization shall be made as laid down under these Rules.
- 5.13 Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Change or Central Pollution Control Board from time to time.
- 5.14 Annual return shall be filed by June 30th for the period ensuring 31st March of the year.

6. **SPECIFIC CONDITIONS (WHICHEVER IS APPLICABLE)**

- 6.1 The authorized actual user of hazardous and other wastes shall maintain records of hazardous and other wastes purchased in a passbook issued by the State Pollution Control Board along with the authorization.
- 6.2 Handing over of the hazardous and other wastes to the authorized actual user shall be only after making the entry into the passbook of the actual user.
- 6.3 In case of renewal of authorization, a self-certified compliance report in respect of effluent, emission standards and the conditions specified in the authorization for hazardous and other wastes shall be submitted to SPCB.
- 6.4 The occupier of the facility shall comply Standard operating procedure/ guidelines published by MoEF&CC or CPCB or GPCB form time to time.
- 6.5 Unit shall comply provisions of E-Waste (Management) Rules, 2016.

For and on behalf of
Gujarat Pollution Control Board

(R. B. Trivedi)

Environment Engineer

No: GPCB/ SRG-CCA-229(42)/ID 24285/ 754869

Date: 03/20/2023

ISSUED TO:

M/s. Coromandel International Limited.
Plot No. 2102, 2104/1, 735 & 2112/2113,
GIDC Sarigam,
Tal. Umbergaon,
Dist. Valsad - 396155

1233



Surender Singh Hooda
<sshoda65@gmail.com>

**OA No. 30 of 2023 // Aryavart Foundation vs
Coromandel International Ltd.**

Surender Singh Hooda <sshoda65@gmail.com>

Mon, Apr 1, 2024 at
5:24 PM

To: Saurabh Kulkarni <sdkadvocate@gmail.com>, Maulik Nanavati
<maulik@nanavatico.com>, rahul.garg@mgklegal.com,
aniruddha1488@gmail.com

Respected Sir,

Please find attached Additional Affidavit on behalf of the Applicant in
the captioned matter.

Warm Regards,

Dr. S.S.Hooda
Advocate On Record
Supreme Court of India
B-40,L.G.F, NDSE-II, 49
09868280166



Aryavart Coromandel Addl. Affidavit Final.pdf
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