

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

Original Application No. 04/2025

News Item titled "four workers killed in storage tank explosion at Gujarat industrial unit" appearing in The Hindu dated 03.12.2024

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**ADDITIONAL AFFIDAVIT ON BEHALF OF GPCB IN VIEW OF THE
ORDER PASSED BY THIS HON'BLE TRIBUNAL DATED
06.02.2025.**

I, Arun Gulabbhai Patel, the Environment Engineer of the Respondent Board, i.e Gujarat Pollution Control Board (hereafter referred as GPCB or Board), Adult, Occupation: Service, do hereby state on solemn affirmation and make this Affidavit, as under:

I say that I am serving as the Environment Engineer and Unit Head for Ankleshwar Region with the Respondent GPCB and I am aware and conversant with the facts of the case and am authorised to depose for and on behalf of the Board in the captioned matter and thus, am filing this affidavit. I say that I have gone through the Order dated 06.02.2025 passed by this Hon'ble Tribunal in the captioned matter wherein, this Hon'ble Tribunal has directed the Respondent No. 1 Board to disclose certain aspects, as mentioned in the said order and this, the present Affidavit is being filed for the said limited purpose. I

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crave leave of this Hon'ble Tribunal to file other and additional; Affidavit, as and when the need arises.

1. It is most respectfully submitted that this Hon'ble Tribunal in the Order dated 06.02.2025, in para 6, has observed, as under:

6. We are surprised that the reason for the said occurrence has not been mentioned in the affidavit of respondent No.1, rather it is reported that the occurrence took place at the site in question due to some reasons. So, we would like the GPCB to elaborate as to what was the reason for the said occurrence so that we can direct for some precautions to be taken so that such occurrence does not recur in future.

2. With respect to the same, it is most humbly and respectfully submitted that though GPCB was initially unaware about the exact reasons for the occurrence of the accident, the Unit had submitted an Accident investigation report carried out by one Solomax Fire Solutions LLP along with Revocation application to Board, which was infact tendered by the unit in response to the direction issued in Closure order. A copy of the said Report is annexed hereto and is marked as "**ANNEXURE - R1**".

3. A perusal of the said report, and in particular, would indicate as follows.

- Accident occurred due to flash fire inside the tank leading to over pressure generated within Feed tank no. 1 of spray dryer.
- Accident took place due to over pressure inside the tank. Due to sudden over pressure and limited venting arrangement the tank roof detached completely from the welding joints.

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- Report mentions there is no proof of any hot work being carried out on top of tank on date of accident or otherwise.
- The source of spark remains unknown.

4. I say that as far as the other observation of this Hon'ble Tribunal in para 7 & 8 of the order dated 06.02.2025 is concerned, which pertains to the amount of compensation, it is most humbly and respectfully submitted that the Central Pollution Control Board CPCB (hereafter referred as CPCB) Guidelines for levying Environmental Compensation (hereafter referred as EDC guideline) is prescribed in GPCB's technical manual which is being followed in the State of Gujarat. A copy of such guidelines is annexed hereto as "**ANNEXURE - R2**".

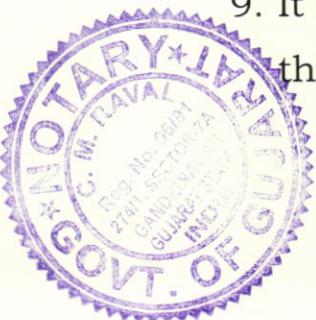
5. The EDC guideline states that in case of industrial accident results in casualty, it shall be considered as case which is severe/emergency. On the basis of this prevailing guideline, the Board has imposed Interim Environment Damage Compensation (hereafter referred as Interim EDC) of Rs. 1 Crore along with directions on 05.12.2024. The amount of interim EDC is calculated on the basis of formula prescribed by the CPCB. However, in the present case, as the extent of damage was unascertainable, this Board levied EDC as per the guidelines issued by the CPCB based on the directions contained in the orders passed by the Hon'ble Tribunal in Paryavaran Suraksha Samiti & Anr. Vs. Union of India (Original Application NO. 593 of 2017) and Aryavart Foundation Vs. M/s Vapi Green Enviro Limited & Others (Original Application No. 95 of 2018). Copies of such order are annexed hereto and are marked as "**ANNEXURE - R3(Colly)**".

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6. It is submitted that GPCB has imposed an immediate interim EDC amount. However, for assessment of final EDC amount, unit has been directed in closure order to carry out assessment of EDC through institute of national repute like NEERI/ IIT and thereafter, the final amounts towards the EDC will be decided. For the said purpose, the Unit has engaged Sardar Vallabhbai National Institute of Technology, Surat (hereafter referred as SVNIT-Surat) to assess the EDC and have attached Purchase Order and acceptance letter to Board vide letter dt. 16.12.2024. A copy of the same is annexed hereto and is marked as "**ANNEXURE - R4**". SVNIT-Surat in its acceptance letter dt. 16.12.2024 requested 03 months' time to complete the work. In time bound action plan submitted to Board on dt. 07.02.2025, unit has stated that SVNIT-Surat has commenced the work and the experts made their first visit on 28.12.2024. A copy of the same is annexed hereto and is marked as "**ANNEXURE - R5**".
7. Unit has submitted EDC assessment report carried out by SVNIT-Surat on dated 13.03.2025. However, later submitted that the same is under discussion with SVNIT-Surat. Hence, Board has not considered the report submitted by Unit at present.
8. I say that as far as the observation of this Hon'ble Tribunal in para 9 of the Order dated 06.02.2025 is concerned, which pertains to the illegible copies, the legible copy of Notice of entry and inspection issued to the unit during visit dated 03.12.2024, annexed at page nos.205-206 of earlier affidavit is enclosed herewith as "**ANNEXURE -R6**", Translated copies of written remarks issued to the unit during visit dated 03.12.2024 is annexed as "**ANNEXURE - R7**".
9. It is further submitted that with reference to the observation of this Hon'ble Tribunal in para 11 of the Order dated 06.02.2025,

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wherein, this Hon'ble Tribunal has stated that Respondent No.1 - GPCB should also mention in their affidavit, which is to be filed, as to after the Closure Direction having been passed, whether any alternative arrangement has been made with regard to the disposal of hazardous waste or not and if yes, what are the details thereof, it is to state that:

There are three (03) other common facilities in Bharuch District viz. (1) Panoli Enviro Technology Ltd., Panoli (2) BEIL Infrastructure Ltd., Dahej and (3) BEIL Infrastructure Limited, Ankleshwar wherein, the member units can send their concentrated wastewater for disposal. The consent copies of the same are enclosed herewith as "**ANNEXURE - R8 (Colly)**". Board has issued trial revocation to Unit (M/s. Detox India Private Limited) for 03 months under section 31-A of Air Act-1981 vide order dt. 12/02/2025 with specific conditions as under:

1. Unit shall comply with CCA conditions.
2. Unit shall comply with undertakings dated 03/01/2025, 08/01/2025 and 31/01/2025.
3. Unit shall not use Spray dryer feed effluent storage tank No. 1 until repaired and certified by Competent Authority and without prior intimation to Board.
4. Unit shall operate the entire plant (common facility) on 75% capacity of CCA quantity except spray dryer facility which shall be operated on 50% capacity of CCA quantity.
5. Unit shall comply with the revised time bound action plan submitted on 07/02/2025 and shall submit completion report to Board.
6. Unit shall comply with submitted time bound action plan of recommendation points of Safety audit and HAZOP study and submit completion report to Board.

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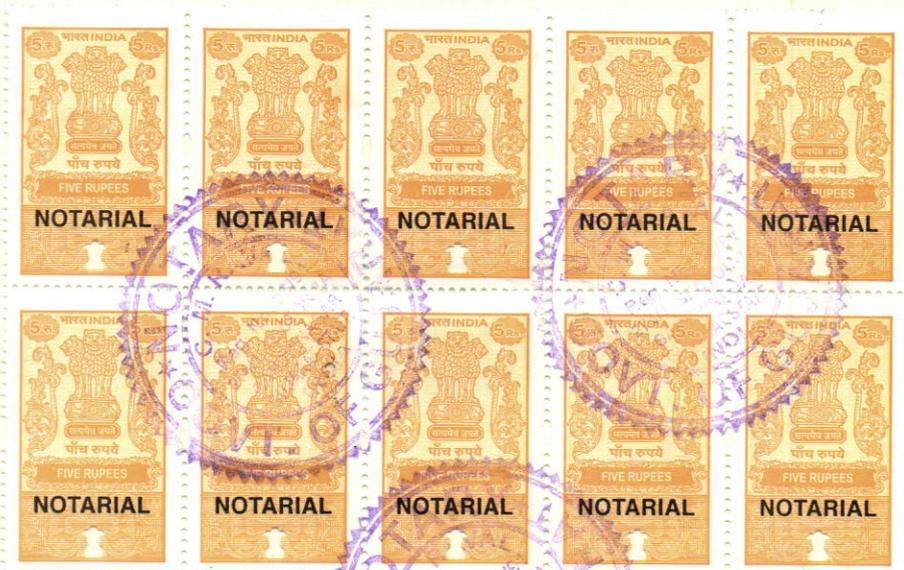


7. Unit shall submit final report of assessment of Environment Damage compensation through institute of national repute to decide final EDC.
8. Unit shall strictly follow the Spray dryer process flow diagram submitted with reply dt. 06/02/2025. Unit shall use existing stripper provided with MEE till dedicated stripper with spray dryer is not provided. But in no cases, unit shall deviate the submitted process flow diagram.
9. Unit shall provide the treatment processes listed in Spray dryer process flow diagram prior storing and disposing remaining effluent present in Spray dryer feed effluent storage tank No. 1 and 2.
10. Unit shall check the analytical parameters in incoming effluent from member industries as submitted with reply dt. 06/02/2025.
11. Unit shall comply with the order/ direction of the Hon. NGT PB matter O.A. 1384/2024. (New O.A. No. 04/2025 (WZ).

A copy of the same is enclosed hereto and is marked as **“ANNEXURE-R9”**.

What is stated hereinabove is true and correct.

Solemnly affirmed at Gandhinagar on this 3rd day of April 2025.



Handwritten signature of the deponent

Deponent
SOLEMNLY AFFIRMED
BEFORE ME

Handwritten signature of the notary
(C. M. RAVAL)
NOTARY
GOVT. OF GUJARAT

3 APR 2025

Entered in Notary Register at
Serial No. 128 Vol. No. III
C. M. RAVAL ADVOCATE & NOTARY
GANDHINAGAR

3 APR 2025



Operated by  VEOLIA

DETOX INDIA PVT. LTD.
ANKLESHWAR

ACCIDENT INVESTIGATION REPORT
January 2025



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Operated by VEOLIA

ACCIDENT INVESTIGATION REPORT

January 2025

DETOX INDIA PVT. LTD.

ANKLESHWAR

	Prepared by	Approved by
Name	Rupesh Jambudi	L K Dungrani
Date	12/01/2025	16/01/2025
Sign.		



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FOREWARD

After the Accident at **M/s. Detox India Pvt. Ltd, (Operated by Veolia) Ankleshwar ("Company")**, M/s. SOLOMAX FIRE SOLUTIONS LLP, Surat - (SOLOMAX) was approached by the Top Management for conducting the Accident Investigation to identify the root causes of the Accident.

The Accident occurred on 3rd December 2024 at the Ankleshwar unit. A team from SOLOMAX conducted a preliminary site visit on 5th December 2024.

Our investigation focused on identifying the root and underlying causes of the Accident. Emphasis was placed on uncovering system-based causes rather than attributing the accident to individual-specific issues.

Based on the inputs received from the witnesses, site observations and data, the root causes were identified based on information supplied to us by the Company, our plant visits and interaction with employees. The points of our detailed investigation are summarized and also included in the Report.

The Executive Summary of our report, is given in the beginning to highlight the main points of the Report, Site Visits and Interactions with the team members of the organization.

We are thankful to the officers and workers of the Company for their kind cooperation. We acknowledge the continuous help given to us by the Site Management.

We hope, if the compliance of the recommendations made for all the causes will further enhance the occupational health, safety and environment system of the Company.

DATE: January 16, 2025

PLACE: SURAT

PARTNER

SOLOMAX FIRE SOLUTIONS LLP



ACKNOWLEDGEMENT

M/s. SOLOMAX FIRE SOLUTIONS LLP wishes to place on record our sincere gratitude to **M/s. Detox India Pvt. Ltd., (Operated by Veolia) Ankleshwar** management for putting faith on us and extending an opportunity to carry out an important assignment like this. The efforts of the site management in handling the Accident in very appropriate manner are appreciated. It would be inappropriate, if we miss to appreciate the efforts put in by the Site Team as a whole for arranging special meetings, deliberations, site visits and issue of all required documents at shortest intimation to facilitate the Investigation. Our gratitude is also due to all plant / sectional field level officers and shop level employees.

We extend our sincere gratitude to the management and staff of M/s. Detox India Pvt. Ltd., Ankleshwar, for their cooperation and support during the investigation process. Their transparency and willingness to provide detailed information were instrumental in identifying the root causes of the accident.

We also acknowledge the efforts of our team at M/s. SOLOMAX FIRE SOLUTIONS LLP, Surat, for their diligent work in conducting the investigation, analyzing the findings, and preparing this report.

Lastly, we appreciate the trust placed in us to contribute to improving safety measures of the Company and preventing future accidents. This report is the result of a collaborative effort aimed at enhancing workplace safety and fostering a culture of proactive risk management.



Caution Note & Liability

M/s. Detox India Pvt. Ltd., (Operated by Veolia), Ankleshwar management has hired Solomax Fire Solutions LLP (Solomax) for Investigating into the Accident which took place on 3rd Dec. 2024. Our consulting services for Accident Investigation was conducted by Solomax and we have performed the task in good faith using generally accepted guidelines, best industrial practices, which Solomax considers reliable. Although Solomax performed its consulting services pursuant to reliable and generally accepted practices in the industry, Solomax does not guarantee or provide any representations or warranties with respect to the Company's use, interpretation or application of the findings, conclusions, and/or suggestions of the consulting services provided by us. Moreover, the findings, conclusions, and the suggestions resulting from the consulting service are based upon information and documents presented by the Company at the time of detailed investigation in form of evidences, witnesses and documents. SOLOMAX FIRE SOLUTIONS LLP does not hold any liability with respect to interpretation or application of the consulting services provided by Solomax for this assignment / report. No responsibility, whatsoever it may be, is assumed by Solomax for any injury to person/s and/or damage to property as a matter of products/services liability, negligence, or otherwise, or from any use or operation of any methods, products instructions or ideas contained in the material of the report. The Company is advised to review the actual text of applicable legislation for analysis & ensuring compliance.



EXECUTIVE SUMMARY

The Accident Investigation of **Detox India Pvt. Limited, Ankleshwar, Gujarat (INDIA)** was conducted by **M/s. Solomax Fire Solutions LLP, Surat** during the period **05th Dec. 2024 to 10th Jan. 2025**.

On Tuesday, December 03, 2024, @ 12.40 PM, an explosion occurred in Spray Dryer Plant area in one of the Feed Tank. Total Four persons were seriously injured and expired and besides these deceased persons, no other person received any injury due to the accident. The Explosion has caused damage to the Tank. The roof of the tank flew away and fell approx. 20 mtr from the tank in open space of the plant. At the time of Accident, the tank was almost 50% filled with Industrial Waste effluent.

Four workers of Contractor who were fixing hand railing on the top of the roof also affected by the Explosion and roof detachment and received serious multiple injuries and fell away from the tank – inside and outside the premises and died on the spot.

We determined that accident had occurred due to the flash fire inside the tank leading to over pressure generated within Feed Tank No. 1 of Sprayer Dryer Plant which led to bursting inside the tank and the roof got detached and flew away and fell on open space inside the plant premises. With the roof all the accessories connected with the roof also got detached and flew in all directions. Simultaneously the hand railings which were being installed on the roof and other pipes connection on the roof of the tank also detached and fell at different location near the tank and near the roof.

The accident took place due to the over pressure inside the tank. Due to the sudden over pressure and limited venting arrangement the tank roof detached completely from the weld joints and thrown almost 20 mtr from the tank. The vent was fitted with loose blind flange with one bolt. Due to this explosion, nearby building's windows, false ceilings got damaged. The level sensor which was installed on the top of the tank was also damaged and flew off with the



roof. There was no apparent damage observed to any other equipment, machinery, buildings or electrical cables.

The total 66 number of employees were present in the premises before the Accident. The head count was done at the Assembly Point near main gate and the head count after the Accident was 62 persons.

Basis the review of Hot Work Permit issued on 03.12.2024, it appears that the concerned safety officer has recommended that the tank has to be emptied. In this regard, we have been informed by the concerned safety officer that the tank has to be emptied only in the event any Hot Work was supposed to be carried on top of the tank. Basis our investigation, there is no proof of any Hot Work being carried out on top of the tank on the date of accident or even otherwise.

Date: 16th Jan. 2025

PARTNER

**INTRODUCTION**

Solomax Fire Solutions LLP conducted an in-depth investigation into the serious accident that occurred at the premises of M/s. Detox India Pvt. Ltd., Ankleshwar. This investigation was undertaken with the primary objective of documenting and analyzing the significant factors and root causes – the systemic causes that led to the loss of life and property so to prevent the reoccurrence. The main aim of the Investigation is to prevent the situation leading to the accident.

This initiative was carried out in response to the organization's management request to identify the underlying causes of the accident. Additionally, the findings aim to be a valuable resource for other facilities under the organization's umbrella, enabling them to learn critical lessons and implement measures to prevent similar incidents. Our investigation also serves to assist the organization in strengthening its safety programs and procedures to enhance life safety and minimize property loss.

The Solomax Accident Investigation Team undertook an extensive series of on-site studies at the Ankleshwar plant to thoroughly examine the accident in question. This investigation involved a meticulous and methodical approach, ensuring that every relevant detail was considered and analyzed. Over the course of their investigation, the team conducted in-depth discussions with the site personnel, gathering firsthand insights and understanding the sequence of events leading up to the accident. In addition, the team carried out a comprehensive review of all data collected during their site visits, including operational logs, safety procedures, and any other relevant documentation. This rigorous and collaborative effort between the investigation team and the site staff formed the cornerstone of this detailed report, ensuring that the findings and recommendations presented are well-founded and based on a thorough understanding of the situation.

Access to the accident site and data collection activities were made possible through the cooperation and assistance of the Detox India Pvt. Ltd.



Ankleshwar plant team. Their support ensured a detailed examination of the accident, contributing significantly to the accuracy and comprehensiveness of our findings.

The contents of this report, including observations on safety conditions and the accident's contributing factors, are based on the best available data gathered during the on-site investigation and any additional information provided throughout the report development process. It is important to note that this report is not meant to assign blame or determine liability for the loss of life or property resulting from the accident to a person or a group of persons. Instead, it focuses on presenting a factual account of the investigation, data collection, and analysis to identify contributing factors and provide actionable insights.

We sincerely hope that this report will serve as a critical resource for improving safety protocols, fostering a Safety culture, Safety awareness, and preventing the recurrence of such tragic incidents in the future.

The investigation and the Analysis of the causes behind the accident and the details of the accident can be shared with other site so that it may help the other site and learnt the lesson from the accident for life safety and property loss prevention purposes. This will also help the organization to strengthen their Safety Programs and Procedures to avoid such accidents.

Accident Investigation team visited multiple times to Detox India Pvt. Ltd., Ankleshwar Plant to perform an on-site study of this accident and to discuss with the witnesses and to analysis the activities which are directly or indirectly responsible for the accident from 5th Dec. 2024 to 10th Jan. 2025. To prepare this report, frequent visits to the plant were conducted to carry out an on-site study and gain a thorough understanding of the accident. These visits were followed by detailed discussions with the Site Team to gather insights and perspectives. Additionally, the data collected during these visits was carefully analyzed, forming the foundation for the findings and conclusions presented in this report. Access to the plant premises, along with the opportunity to



study the accident scene and conduct data collection activities, was made possible through the support and cooperation extended by the Detox Team of the Ankleshwar Plant. Their assistance was instrumental in facilitating these crucial activities, enabling a comprehensive examination of the accident and the gathering of relevant data for further analysis. The information and details presented in this report regarding the safety conditions are derived from the most reliable data and observations gathered during the on-site data collection phase. These findings were further supplemented by any additional information provided during the process of report development. Every effort has been made to ensure that the report reflects an accurate and comprehensive assessment of the safety conditions based on the available resources and insights obtained throughout the study.

The purpose of this report is not to pass judgment or assign liability for the loss of life or property resulting from this injury accident on any individual or any specific department. Instead, the intention of this report is to present the findings obtained through the data collection and analysis efforts conducted during the investigation and to identify the systemic causes. It seeks to provide a clear and objective account of the factors that contributed to the loss of life or property, offering insights that can inform future preventive measures and enhance safety practices.

For the purpose of this analysis, Recognized and Generally Accepted Good Engineering Practices (RAGAGEP), in conjunction with current codes and standards, were employed as foundational benchmarks. These well-established guidelines provided a robust framework for evaluating the safety measures and operational conditions at the Detox facility in Ankleshwar on the day of the event. By using these benchmarks, a comprehensive comparison was made between the facility's existing practices and state-of-the-art fire protection standards, ensuring an in-depth assessment of any deviations or areas requiring improvement.

It is essential to acknowledge that certain codes, standards, and practices which are used as reference in this analysis may not have been in existence



or applicable at the time the facility was originally constructed or during its operational lifespan. The evolution of safety regulations and engineering practices over time means that some of the benchmarks used in this assessment were likely developed or implemented after the facility had already been established, which could account for any differences between the facility's original design and current expectations.

We have not conducted an evaluation of the facility's compliance with the codes and standards that were in effect at the time of its original construction or during its operational period.

The cooperation and assistance of the Site Team is greatly appreciated.



INCIDENT DESCRIPTION

1. DATE OF ACCIDENT : 03rd December 2024
2. TIME OF ACCIDENT : 12:40 hrs.
3. LOCATION OF ACCIDENT : Feed Tank 1, Spray Dryer Plant
4. NUMBER/S OF PERSON INJURYED : Four
5. NAME OF INJURED PERSON :
 - a. Mr. Ashok Ramvriksh, 49 Yrs, Male, Rigger
 - b. Mr. Mukesh Singh, (S/o Krishna Singh), 36 Yrs, Male, Rigger
 - c. Mr. Harinath Yadav, (S/o Bodha Yadav), 43 Yrs, Male, Rigger
 - d. Mr. Paulesh Ram, (S/o Tileshwar), 33 Yrs, Male, Fitter
6. TYPE OF INJURY : Multiple Injuries to all workers
7. BODY PART : Whole body of all workers
8. NAME OF THE CONTRACTOR : M/s. Panchmurti Fabricators

9. BRIEF DESCRIPTION OF THE ACCIDENT :

The workers of contracting agency M/s. Panchmurti Fabricators were working at Spray Dryer area for Fabrication Work on 70 KL capacity Feed Tank 1.

At around 12:40 hrs., the said tank burst and the roof on which they were working few away causing severe injuries and died on the spot.

10. DAMAGES

Due to this Explosion incident, there was damage to the Feed Tank 1. The roof of the tank was detected from its weld joint and flew away and fell on the open ground which is across the road almost 20 mtr from the tank. The SD Plant Control room building windows glasses scattered and false ceiling partially collapsed in the building towards the tank. There was no apparent damage to the any property and equipment including Electrical Cables in the vicinity of the Tank. The pipe line connected on the top of the tank and hand railing (which was being erected) was completely detected from the base and

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thrown away with the roof. The level indicator which was installed on the top of the tank also got detected and thrown with the roof of the tank. The data of the material (Analysis) in the tank and in process materials are not assessed in this report.

The value of Damaged property and equipment are also not accessed in this report.

Some of equipment / accessories which are in close proximity or installed on the tank are Roof, Pipeline – recirculation/ receipt, Level Indicator, Hand railing. etc. got damaged due to the accident.



BACKGROUND

UNIT DETAILS

Detox India Pvt. Ltd, the unit is situated in GIDC Estate in Ankleshwar area and involved in processing / treatment of hazardous effluent received from different units.

Key Processes : The following processes are deployed for treatment of Industrial Waste Water

- ETP
- Ammonia/ VOC Stripper
- MEE / MVR with ATFD & Centrifuge
- MVR
- Conventional ETP (2 stage Aeration with MBR & RO)
- Spray Dryer
- Steam Boiler
- Power Generation
- Integrated Common Boiler Facility
- Boiler Water Preparation Unit
- MVR only treatment of Boiler Water preparation plant RO reject

Detox India Pvt. Ltd. has a long-standing reputation as a pioneer in the field of environmental management and sustainable solutions. Established with a mission to address the growing industrial challenges of waste management and pollution control, the company has become a prominent player in offering innovative and eco-friendly solutions. Over the years, Detox India has demonstrated a strong commitment to ensuring compliance with environmental regulations while promoting sustainability in industrial operations.

The company's journey began with the establishment of its flagship facility in Ankleshwar, Gujarat, a region known for its industrial activity. From its inception, Detox India focused on addressing the needs of industries for safe and efficient disposal of hazardous and non-hazardous waste. With cutting-edge technology and a dedicated team of experts, the company quickly gained recognition for its high standards in waste treatment and recycling.

Detox India has consistently expanded its capabilities and infrastructure to



meet the evolving needs of the industrial sector. Its services range from industrial effluent treatment, incineration, and solid waste management to consultancy and advisory services for environmental compliance. The company has also invested significantly in research and development to stay ahead in adopting innovative methods for waste minimization and resource recovery.

The organization's growth has been marked by several milestones, including certifications for adhering to international environmental and safety standards. Detox India has actively collaborated with regulatory authorities, industry bodies, and local communities to promote environmental awareness and implement best practices.

Through its unwavering focus on sustainability and excellence, Detox India Pvt. Ltd. has become a trusted partner for industries across India, contributing to a cleaner, greener, and safer environment. Its legacy continues to inspire innovation and leadership in the field of environmental management.

History of Veolia

Veolia is a global leader in optimized resource management, with operations spanning across water, waste, and energy management. The company was founded in **1853 in France** as the "Compagnie Générale des Eaux," primarily focused on water distribution. Over time, Veolia expanded its services, becoming a pioneer in providing integrated solutions for managing resources efficiently.

Veolia's global footprint grew significantly through acquisitions, notably acquiring **Dalkia** in 1998 (focused on energy services) and **Transdev** (transport services). In the early 2000s, Veolia became one of the world's leading companies in environmental services, offering a diverse range of solutions for water treatment, waste management, and energy services.

The company's commitment to sustainability, environmental stewardship, and innovative technologies has made it a leader in the circular economy. Veolia



aims to support businesses, cities, and governments in reducing their environmental impact by providing services that promote the reuse of resources, reduce waste, and lower carbon emissions. It operates in over 40 countries, providing services to millions of people, with a focus on creating a more sustainable future through technological innovation and environmental responsibility.

Today, Veolia is recognized globally for its dedication to environmental sustainability, offering comprehensive services designed to improve resource management in urban, industrial, and commercial sectors.

Veolia and Detox India Pvt. Ltd. Collaboration

In some markets, Veolia has partnered with or worked alongside companies like Detox India to address local environmental challenges. Both organizations share a similar vision of promoting sustainability and improving waste management practices. While Veolia operates on a global scale, Detox India focuses primarily on the Indian subcontinent, offering tailored solutions for local industrial needs. Through such collaborations, these companies aim to provide comprehensive environmental solutions that span the full lifecycle of resource use—from waste disposal to energy recovery and resource reuse.

Veolia's takeover of Detox India Pvt. Ltd. also facilitated the implementation of international best practices in the Indian market, allowing local industries to benefit from Veolia's extensive knowledge in water treatment, waste management, and energy solutions. The integration of Detox India into Veolia's operations further reinforced Veolia's commitment to supporting sustainable development in India, helping industries meet regulatory requirements while also reducing their environmental impact.

This acquisition has not only broadened Veolia's portfolio in India but also reinforced its position as a leader in the global environmental services industry. Through the successful merger of global expertise and local insights, Veolia aims to continue its efforts toward a circular economy, promoting a cleaner, safer, and more sustainable future for both India and the world.

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The unit is having state of the art Laboratory which facilitate to undertake samplings of effluent received from the customer. This in-house facility is designed to streamline operations, allowing the unit to process tasks more efficiently and deliver results in a timely manner. By housing all necessary resources and equipment under one roof, the facility enhances the unit's ability to handle complex processes with greater speed and accuracy. This centralized setup reduces delays, ensures seamless workflow, and allows for quicker turnaround times, ultimately improving overall productivity and responsiveness to customers.

All these factors have facilitated the company to obtain certifications of ISO 9001:2015 for Quality Management, ISO 14001:2015 for Environment Management system and ISO 45001:2018 for Occupational Health and Safety.

The Company started its operations for Treatment of Hazardous Waste received from its customers since 2016 and has got valid factory license (Lic. No. 27929) up to December 2024.

Fire Hydrant System are installed to cover entire plant area. The different types of signage including emergency signage are provided across the plant. The Portable Fire Extinguishers are also provided throughout the plant premises. Company has provided all required PPEs to all the employees and follow the applicable legal requirements of Factories Act, 1948.

Safety signage, safety posters & slogans are displayed at plant area to spread awareness of safety among the workers.

Strength:

- ▶ The state of art Lab Quality Control Department which has capability to handle and monitor the parameters related to Industrial Waste Water before handling the effluent in the plant
- ▶ Strong and Experienced Team.
- ▶ The optimization of waste management.



- ▶ Green belt development for the betterment of the environment.

EHS Management:

The EHS Management has been working hard to ensure EHS aspect in the plant. The following is the positive strength.

- ▶ Positive and supportive approach observed at senior management level, having strong desire to improve on EHS front.
- ▶ Safety policy displayed at Plant Area.
- ▶ Display of sign board provided for almost all aspect of EHS Management including LSR, 5S and few of the SOPs.
- ▶ Daily safety meeting / TBT by top management on start of the day.
- ▶ Safety induction training provided to employees, workers.
- ▶ CCTV surveillance camera provided and monitored
- ▶ LOTO system board are provided at different locations and with locks with name of the employees are provided.
- ▶ Near miss reporting system on google drive evident.

These are few of the EHS practices which are giving results but few more best practices which needs to be adopted are mentioned in the Executive Summary and Observation.



1.1 LAYOUT PLAN:



1.2 DETOX INDIA PVT. LIMITED TEAM (VEOILA):

1. Mr. Yogesh Gupta, Chief Operating Officer, Industrial & Hazardous Waste Business
2. Mr. KMP Singh (Director)
3. Mr. Dharmendra Chothani (GM, Ops, Ankleshwar Unit)
4. Mr. Ayashkanta Misra (Maint.)
5. Mr. Asfak Katlariwala (Electrical)
6. Mr. Jitendra Rawal (HSE)

1.3 INDUSTRIAL ACTIVITY

The unit is involved in Treatment of Hazardous Waste (Effluent / Industrial Waste Water) received from different unit.

PROCESS DESCRIPTION:

The below are the Processes which were directly connected with the accident sequence.



1.3.A Receiving Bay:

Tankers are received in receiving bays. After confirming the wastewater characteristics through fingerprint analysis, tankers are guided to respective unloading. Unloading bays are constructed with RCC floor and provision of drain to collect the spillage if any. Drain leads to the collection sump and from the collection sump it is transferred to the respective tank based on the characteristics of spillage material.

1.3.B Receiving Tanks:

Received tanks are divided into different compartments to collect the different steam in a segregation way. pH sensitive stream shall be collected into the acid lining tanks. Defoaming systems are installed at the top of each tank to collect the fumes if any generates from the tanks.

1.3.C Pretreatment

Pretreatment comprised of pH correction and filtration process. To neutralize the acidic effluent hydrated lime shall be utilized, to neutralize basic effluent it is proposed to do through sulphuric acid.

1.3.D Pre-Treatment:

Effluent is received in an equalization tank which is provided with acid & alkali dosing arrangement for pH neutralization & coarse bubble diffusers will be provided to mix the wastewater. This effluent will be pumped to Flash mixer where alum is dosed for coagulation. Coagulated effluent will overflow to the primary Clarifier (Lamella). Suspended solids get settled at the bottom of the clarifier & sludge which is disposed of to the sludge dewatering unit. The Supernatant of Primary clarifier is collected in an intermediate tank.

This treated effluent from the intermediate tank shall be pumped through a Self-Cleaning Filter for removing any fine solids escaping the primary settling tank & then through Activated Carbon filter for removal of COD. The outlet from ACF shall be collected in the UF Feed tank.

The following are the Properties of Raw Materials, the vessel hazards and the process hazards connected with the particular process in which the accident took place.



1.4 PROPERTIES OF RAW MATERIALS & PRODUCTS

If the products are “hazardous chemical” as per Manufacturer, Storage and Import of Hazardous Chemical Rules 1989 (as amended in 2000) or Rule 68J of the Gujarat Factories Rules 1963 give following details.

The plant is handling the Hazardous waste from different units and the properties and hazards are dependent on the type of the waste received which may vary vastly.

No.	Name of the Product	Maximum Quantity Stored	Quantity in the biggest container	Density	State & pressure (Kg/cm ²) & Temp. (°C)	If handled or observed manually		Types of possible hazards (Fire, Explosion, Toxic Release, Spill etc.)	Control Measures provided
						Duration of handling i.e. Exposure at a time in minutes or hour	Frequency of handling or exposures per year.		
1	2	3	4	5	7	14	15	16	17
1	Liquid Waste	1. 16x450 AG tank = 7200 KL 2. 16x350 KL= 5600 KL Total 12800KL	450 KL Above Ground Tank	Liquid	Liquid NTP	Regular	Regular	Toxic gas release, Spillage, Explosion	Scrubber system, Overflow launder connected to drain pit
2	Liquid Waste (After PT)	2X 75 KL	75KL	Liquid	Liquid NTP	Regular	Regular	Toxic gas release, Spillage, Explosion	Level Indicator, Dyke wall, Fire extinguisher, Fire Hydrant system
3	VOC	70KL	35 KL Tank Farm	Liquid	Liquid NTP	Regular	Regular	Fire hazard, Spillage, Toxic gas release	Dyke wall, Fire extinguisher, Fire hydrant system
4	Acid	70KL	50 KL Tank Farm	Liquid	Liquid NTP	Regular	Regular	Spillage, Toxic gas release	Dyke wall, Fire hydrant system
5	Caustic Lye	70KL	50 KL Tank Farm	Liquid	Liquid NTP	Regular	Regular	Spillage and Leakage	Dyke wall, Fire hydrant system
6	Coal	1500 MT	200 MT Coal Shed	Solid	Solid NTP	Regular	Regular	Fire	Storage in isolated area, Sprinkler provided, Restricted entry,
7	Salt	10000 MT	0.5 MT Tank Farm	Solid	Solid NTP	Regular	Regular	Spillage	Storage in Sludge area, Restricted entry



No.	Name of the Product	Maximum Quantity Stored	Quantity in the biggest container	Density	State & pressure (Kg/cm ²) & Temp. (°C)	If handled or observed manually		Types of possible hazards (Fire, Explosion, Toxic Release, Spill etc.)	Control Measures provided
						Duration of handling i.e. Exposure at a time in minutes or hour	Frequency of handling or exposures per year.		
1	2	3	4	5	7	14	15	16	17
8	RO Permeate	300KL	300KL UG	Liquid	Liquid NTP	Regular	Regular	Spillage and Leakage	Storage in underground tank
9	MEE Condensate	475 KL	125 KL AG	Liquid	Liquid NTP	Regular	Regular	Spillage and Leakage	Storage in tank farm Dyke wall
10	Diesel	1000 Lit	200 Lit.	Liquid	Liquid NTP	Regular	Regular	Fire, Spillage and Leakage	Storage in small quantity diesel barrels and stored away from other facilities.



1.5

LIST OF HAZARDOUS RAW MATERIALS INCLUDING FUELS AND UTILITIES.

No.	Name of Raw Material	Storage Capacity				Actually, stored MT
		Type of Container*	Size of Container MT	No. of Containers	Total Qty. MT	
1	2	3	4	5	6	7
1	Liquid Waste	UG Tank and AG tank	350 KL & 450 KL	16	5600 KL	5000 KL
2	VOC	Tank Farm	35 KL	2	70 KL	35 KL
3	Acid	Tank Farm	50 KL	2	70 KL	50 KL
4	Caustic Lye	Tank Farm	35 KL	2	70 KL	50 KL
5	Coal	Coal Shed	Heap	Heaps	1500 MT	1500 MT
6	Salt	Tank Farm	Bag 0.5 MT	Bags	10000MT	6000 MT
7	RO Permeate	Under Ground Tank	300 KL	1	300 KL	200 KL
8	MEE Condensate	Above Ground Tank	475 KL	1	475 KL	450
9	Diesel	Barrel	200Lit.	5	1000Lit.	1000Lit.



1.6 PROPERTIES OF HAZARDOUS RAW MATERIALS INCLUDING FUELS AND UTILITIES.

If the raw materials are "hazardous chemical" as per Manufacturer, Storage and Import of Hazardous Chemical Rules 1989 (as amended in 2000) or Rule 68J of the Gujarat Factories Rules 1963 give following details.

No.	Name of Raw Material	Maximum Quantity Stored	Quantity in the biggest container & No. of such containers	Density or gravity	Vapor Density	State & pressure (Kg/cm ²) & Temp. (°C)	TLV ppm	LD50 oral rat or	LC50 rat	BP °C	FP °C	Explosive range LEL UEL %	If handled or observed manually		Safety measures provided	Emergency action	Antidotes
													Duration of handling i.e. Exposure at a time in minutes or hour	Frequency of handling or exposures per year.			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Raw Materials																	
1	Liquid Waste	12800 K	350 & 450 KL	There are multiple hazards connected with the liquid waste received from different industrial units.									Regular	Regular	Gloves, Mask, Goggles		All parameters as per MSDS
2	VOC	70 KL	35 KL	1.4 g/cm ³	1.5 g/cm ³	Liquid 25 °c	0.1ppm			50-26°c	Low	3-15.4%	Regular	Regular	Gloves, Mask, Goggles	Take to OHC	
3	Acid	70 KL	50 KL	1.18 g/ML	41.72 kg/m ³	Liquid 25 °c	5 PPM	2140 mg/kg	320 mg/m ³	10-164°c	NA	4-19-4%	Regular	Regular	Gloves, Mask, Goggles	Take to OHC	
4	Caustic lye	70 KL	35 KL	2.13 g/cm ³	1.520 g/cm ³	Liquid 25 °c	2 mg/cm ³	220 mg/kg	1mg server eye	140 °c	NA	-	Regular	Regular	Gloves, Mask, Goggles	Take to OHC	
5	Coal	1500 MT	200 MT	1.8 g/cm ³	1.9 g/cm ³	Solid 25 °c	0.2 mg/cm ³	NA	NA	220-45°c	NA	20-30g/cm ³	Regular	Regular	Gloves, Mask, Goggles	Take to OHC	
6.	Salt	10,000 MT	0.5 - 0.8 MT	2.16 g/cm ³	133.50g/cm ³	Solid 25 °c	0.25ppm	NA	NA	1465°c	NA	NA	Regular	Regular	Gloves, Mask, Goggles	Take to OHC	
7.	RO Permeate Water	300 KL	300 KL	1g/cm ³		Liquid 25 °c	Less than 25ppm	NA	NA	100°c	NA	NA	Regular	Regular	Gloves, Mask, Goggles	Take to OHC	



1.7 STORAGE HAZARDS & CONTROLS

Give following details of all Products Raw materials Intermediates & Byproducts :

Sr. No	Name of the material (Mention Concentration if any)	Total stored Cap. Kg/Ltr.	Actually stored (total) Kg/Ltr.	Actually Stored in the biggest container Kg/Ltr.	Place of its storage	State pressure (Kg/cm ²) & Temp. (°C)	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.)	Control Measures Provided
1	Liquid waste	12800 KL	2606 KL	350 & 450 KL	Underground and Over Ground tank	Atmospheric pressure and Ambient Temp	Toxic gas release, Fire Explosion, Spillage	Scrubber system, Overflow launder connected to drain pit
2	VOC	70KL	35KL	35 KL	Tank farm	Atmospheric pressure and Ambient Temp	Fire hazard, Spillage Toxic gas release	Dyke wall, Fire extinguisher, Fire hydrant system
3	Acid	70KL	50KL	50KL	Tank farm	Atmospheric pressure and Ambient Temp.	Spillage, Toxic gas release, Corrosive	Dyke wall, Fire extinguisher, Fire hydrant system
4	Caustic lye	70KL	50KL	35KL	Tank farm	Atmospheric pressure and Ambient Temp	Corrosive, Spillage and leakage	Dyke wall, Fire extinguisher, Fire hydrant system
5	Coal	1500MT	1500M T	200MT	Coal shed	Atmospheric pressure and Ambient Temp	Fire hazard, CO,	Storage in isolated area, Sprinkler provided, Restricted entry,
6	Salt	10000M T	6000M T	0.5-0.08MT	Tank farm	Atmospheric pressure and Ambient Temp.	Spillage and leakage	Storage in Sludge area, Restricted entry
7	RO Permeate water	300KL	200KL	300KL	Underground tank	Atmospheric pressure and Ambient Temp	Spillage and leakage	Storage in underground tank
8	MEE condensate	475KL	450KL	125KL	Above ground tank	Atmospheric pressure and Ambient Temp.	Spillage and leakage	Storage in tank farm Dyke wall
9	Diesel	1000Lit	1000 Lit	200 Lit	Shed	Atmospheric pressure and Ambient Temp.	Fire hazard, Spillage and Leakage	Separate and Segregated Storage



1.8 PROCESS AND VESSEL HAZARDS & CONTROLS

Give the following details of the manufacturing process - plant and/or product wise.

Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
1	UG tank and AG tank	Unloading and Storage of liquid waste	Tanker Unloading-20- 35KL/tanker Storage-5600 KL MEE-3200KL SD- 2400KL	Under Ground tank	Temp- Ambient Pressure- Atmospheric Flow- 50m ³ /hr (approx.)	Toxic gases and fumes. Spillage and leakage	<ul style="list-style-type: none">• Tanks are having manhole to check level.• Liquid level checking• Trained manpower• Checklist for tanker unloading pressure,• Earthing to tankers• Reflective jackets to manpower• Reverse horn• All tanks Connected to Scrubber• Work permit system• Safety shower provided• Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle.



Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
2	PT plant	Neutralization and filtration	Reactor-4 numbers. Capacity-50KL each Filtration tanks- 4 numbers. Capacity-150KL Acid tanks-2 numbers. Capacity-5kL each	PT plant	Temp- Ambient Pressure Atmospheric Flow- 50m ³ /hr (approx.)	Toxic gases and fumes. Spillage and leakage	<ul style="list-style-type: none"> Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle. Work permit system All reactors and tanks are connected to scrubber Work permit system Trained manpower round the clock. Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle
3	MEE plant	Stripping, Evaporation and drying section	Feed Tank-3 numbers Capacity-250KL each Condensate tanks-3 numbers Capacity-150 KL each VOC tanks 3 numbers-5kL each	MEE plant	MEE : Temp-90-100 deg centigrade Pressure- U/vacuum. 650-680mmHG Stripper section: Temp- 125-135 Pressure- u/vacuum 450-550mmHg ATFD section- Temp- 160-170 Vaccum- 100-150 mmHg	Toxic gases and fumes. Spillage and leakage	<ul style="list-style-type: none"> SCADA based operation Control cabin Instrumentation provided for valve operation (by air actuated or power actuated) Steam piping insulated. Transmitter provided to measure-Temp, vacuum, flow and level. Trained man power round the clock. Work permit system Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle Dyke wall provided Earthing and bonding Safety shower



Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
4	SD plant	Forced evaporation	Feed tank-2 numbers capacity-75KL each	SD plant	Hot air temp- 550-600 deg centigrade vacuum- 40-50 mmWC	Fire, Explosion, Toxic gases and fumes. Spillage and leakage	<ul style="list-style-type: none">• SCADA based operation• Control cabin• Instrumentation provided for valve operation (by air actuated or power actuated)• Transmitter provided to measure-Temp, vacuum, flow and level.• Trained man power round the clock.• Work permit system• Mandatory PPEs like safety shoes, hand gloves, gas mask, safety goggle• Dyke wall provided• Safety shower• Earthing and bonding



Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
5	ETP plant	Biological process and Secondary treatment	Equalization tank-400kl C-tech basin- 3000 KL Overflow of aeration to sec treatment tank- 300KL Sec treatment tank for RO feed- 300KL	ETP plant	Temp- Ambient Pressure- Atmospheric	Fumes. Fire, Spillage and Leakage	<ul style="list-style-type: none">• SCADA based operation• Control cabin• Instrumentation provided for valve operation (by air actuated or power actuated)• Transmitter provided to measure-Temp, vacuum, flow and level.• Trained man power round the clock.• Work permit system• Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle• Dyke wall provided• Safety shower,



Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
6	RO plant	Tertiary treatment	RO1-300KL*2 numbers RO2- 60*2numbers Permeate tank- 300KL Rejeact-200KL	RO plant	Temp- Ambient Pressure:2 5- 50kg/cm2	Spillage and leakage	<ul style="list-style-type: none">• SCADA based operation• Control cabin• Instrumentation provided for valve operation (by air actuated or power actuated)• Transmitter provided to measure- Conductivity flow and level.• Trained man power round the clock.• Work permit system• Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle• Dyke wall provided• Safety shower,• Awareness training



Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
7	MVRE Plant	Evaporation	Feed tank-25 KL*2 nos Condensate tank- 7.5KL*2numbers	MVRE plant	Temp-60 deg centigrade Pressure- 120-150M bar(-)	Spillage and leakage	<ul style="list-style-type: none">• SCADA based operation• Control cabin• Instrumentation provided for valve operation (by air actuated or power actuated)• Transmitter provided to measure- Conductivity flow and level.• Trained man power round the clock.• Work permit system• Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle• Dyke wall provided• Safety shower,• Awareness training



Sr. No	Name of Plant, Department or Place	Name of the Hazardous Process and Operation	Materials in process/operation with their quantity and concentration	Name of its Location	Operating Parameters pressure, temp, flow etc.	Types of hazards Possible (Fire, Explosion, Toxic Release, Spill etc.	Control Measures Provided
8	Boiler	Steam generation	Water feed tank-10KL Coal-1500MT	Boiler	Temp-380 deg centigrade Pressure-30 kg/cm2	Burn injury, Fire, Inhalation Explosion	<ul style="list-style-type: none">• SCADA based operation• Control cabin• Instrumentation provided for valve operation (by air actuated or power actuated)• Transmitter provided to measure- Conductivity flow, level and Pressure.• Trained man power round the clock.• Work permit system• Mandatory PPE's like safety shoes, hand gloves, gas mask, safety goggle• Safety shower• Awareness training



1.9 **OTHERS HAZARDS & CONTROLS.**

The following activities and related hazards are present in the premises because of activities and processes carried out in the plant.

The hazards / activities are

- Loading and unloading of Hazardous waste materials
- Handling of materials
- Working on or near Machinery
- Operation of pumps and motors,
- Electrical System including transmission line in switch yard
- Transportation of material /equipment with help of vehicle, conveyor, pipelines etc
- Machinery Hazards
- Utilities, Air, Steam etc.
- Fuels

These contributes to variety of hazards like

- Fire
- Explosion
- Noise induce hearing Loss
- Electrical Hazards – Electrical Shock, Fire Flash over
- Physical hazards – Slip / Trips / Fall from height / Falling of material from height / Sharp / slippery / unguarded machineries / hot surfaces / Chemical hazards.

Necessary control measures depending on the type of hazards are adequately provided and recommend to be maintained in good working condition. Their proper maintenance and safe working procedures are available & are expected to be followed on continuous basis.



OCCUPANCY CLASSIFICATION

The DETOX is classified as Industrial Building as per NBC Code 2016. DETOX is considered as High Hazard Occupancy as per NBC Code 2016.

APPLICABLE CODES

- Factory Act 1948, Gujarat Factories Rules 1963
- Environment Protection Act
- The Gujarat Fire Prevention and Life Safety Measures (Amendment) Act, 2021

As per notification issued by Urban Development and Urban Housing Department, Sachivalay, Gandhinagar notification no – GH/V/68 of 2021/AGN -102021-100-L1dated 8th July 2021, Fire NOC is not required for the Industrial building covered under the Factories Act, 1948.

- Indian Boiler Rules



INVESTIGATION TEAM PROFILE

Solomax Fire Solutions LLP have designated qualified and experienced investigators to perform this accident investigation as under:

1. Mr. L.K. Dungrani
(Dy. Director Industrial Safety & Health Rtd., Govt. of Gujarat)
Qualification: Mechanical and Electrical Engineer
Experience : More than 45 Years in the field of the HSE.
2. Mr. R. R. Jambudi
Qualification: Civil Engineer, PDIS
Experience : More than 33 Years in the field of the HSE.
3. Mr. K. B. Panchal
Qualification: Electrical Engineer, PDIS
Experience : More than 35 Years in the field of the HSE.

DETOX INDIA PVT LTD, ANKLESHWAR TEAM

1. Mr. Dharmendra Chothani, Unit Head
2. Mr. Bhaskar Datir, SD Plant Head
3. Mr. Bhaskaranand Bhatt, Lab. Head,
4. Mr. Asfak Katlariwala, Head – Elect.
5. Mr. Sachin, Head – IT
6. Mr. Vikas Prasad, Head HR
7. Mr. Vishal Bhanderi
8. Mr. Dipu
9. Mr. Rohit Kumar Prasad
10. Mr. Vicky Chaudhary
11. Mr. Dhwanil Shroff
12. Mr. Ayashkanta Misra
13. Mr. Nishant Modi
14. Mr. Bhavik Patel,
15. Mr. Chandra Prakash Singh
16. Mr. Kirit Dhokiya
17. Mr. Pradhuman Purohit
18. Mr. Sanjay
19. Mr. Nikhil Mokhariya
20. Mr. Abhimanyu Yadav



INVESTIGATION PROCESS

The Team was identified by Solomax to investigate into the serious Accident. The following methodology was used to collect the data, information, and to identify all the possible root causes of this accident. During the process, employees of the Company were interviewed and the statements were taken. The contractor workers of M/s. Panchmurti Fabricators and other contractor workers who were working in nearby vicinity of the accident spot and Workshop area were interviewed.





THE PLANT

SPRAY DRYER PLANT - The Plant in which the Accident took place

The accident occurred in Feed Tank 1 of 75KL capacity situated in Spray Dryer Plant. There are two identical tanks located side by side in open area. These tanks are vertical cylindrical tanks provided with dyke wall surrounding the tank. The tanks are of MS with rubber lining inside the tank. These tanks are provided inside the dyke wall.

The Spray Dryer Plant Control room is situated in the building near the tank which is approx. 4 mtr from the tank. The building is having ground plus one floor. On first floor Offices and Electrical rooms are situated. The plant having different five level floors. Each floor is provided with Fire Hydrants and Fire Hose Boxes.

Fire Protection Systems

Entire Plant is covered with Fire Hydrant System to protect plant in case of Fire Incident. Entire plant is covered with 61 Nos of Single headed Fire Hydrants, 4 Nos of Water Monitors, 2 Nos of Foam Trolley of 200 Liters capacity. The different types of Fire Extinguisher – Portable and Wheel mounted extinguishers are installed in the plant premises. Each floor in the plant are provided with Portable Fire extinguishers. Total 3 Nos of Pump are installed for Fire Hydrant System which are Electric Main Pump, Jockey Pump and Diesel Engine Standby Pump.

The Spray Dryer Plant is covered with Fire Hydrant System peripherally. In the plant all the areas / floors covered with Portable Dry-Chemical Fire Extinguishers, Foam Extinguishers, Riser Hydrant Points on each floor of the building. Extinguishers were kept in entire plant on the ground floor, top floor.



Means of Egress

The Feed Tank is installed on the pedestal on ground and having direct access from the plant road. For accessing the roof of the tank, monkey ladder is provided with cage guard and for access to the ladder a structural platform was erected recently. These are the primary means of egress for the tank. Normally, there is no routine operation / work on the on the platform of the tank except for maintenance of level gauge.

Fire Fighting Training

The Company had an internal fire safety training program that provided guidance to their employees and contracted employees. As part of this program, EHS Team provide their employees fire prevention and fire safety along with induction safety training.

As a part of the Training and Awareness Sessions, Mock drills are carried out periodically.

The EHS & Fire Department

The EHS & Fire Department has 7 personnel for day-to day Operations. The operations are in three shifts. This department has one Fireman. OHC is also established inside the premises. One full time doctor and one male nurse are available in each shift. One Ambulance van with Driver are assigned in each shift. A Manager heading the EHS & Fire Department.

Team of First Aiders and Fire Fighting members are identified across all plant and their presence in the plant premises are well defined by board with IN/OUT information which is displayed near Main Entry Gate. The list of these members are displayed in Security Control room.



THE ACCIDENT

As a part of routine maintenance, repair and replacement, the job of installation / fabrication of Steps, platform and hand railings for Feed Tank – 1 of the Spray Dryer plant was assigned to Maintenance Department. A Fabrication and Erection contractor was identified for this particular job who is regularly carrying out the Fabrication, erection and other routine maintenance activities in the plant.

The job of inner lining was carried out almost 3 months before the accident by the Lining Contractor who was hired for particular job.

As a part of routine maintenance, repair and replacement, the job of installation / fabrication of Steps, platform and hand railings for Feed Tank – 1 of the Spray Dryer plant was assigned to Maintenance Department. A Fabrication and Erection contractor was identified for this particular job who is regularly carrying out the Fabrication, erection and other routine maintenance activities in the plant.

For routine maintenance of Level Indicator which was on the top of the tank, it was decided to have a railing on the tank roof with platform at ground level for the tank. These jobs were assigned to the Team of the contractor. The job of the platform and steps was in progress since 30th Nov. 2024.

Factory Activities and Accident Discovery

The Company is involved in Treatment of Industrial Waste Water (Hazardous Waste). The company is working in three shifts and one general shift.



Shift Timings are as under:

- 1st shift : 06.00 AM to 02.00 PM
- 2nd Shift : 02.00 PM to 10.00 PM
- 3rd Shift : 10.00 PM to 06.00 AM
- General Shift : 08.30 AM to 05.00 PM

On December 3rd, 2024, employees were fully engaged in their routine daily activities, performing tasks according to the duties assigned to them. Each employee carried out their responsibilities as per the established work schedule, contributing to the smooth operation of the facility. The activities varied depending on the specific roles and duties assigned, ensuring that all operational functions were carried out efficiently throughout the day.

Suddenly sound like explosion heard in the all the plants at 12:40 PM and employees running out from plants is noted.

Site Emergency team responded to emergency and immediately started their action for rescue. There was no Fire or any subsequent damage to any plant equipment, Electrical System or building except window glasses of Spray Dryer Control room building and its false ceiling on ground floor.

Fire Department Notification and Response

First call was made to Ambulance van by the internal team and for external help call was given to Police at 12:45 PM and the Police team reached the plant at 13:30 PM. And later other responses from external agency/companies came to support and necessary help.

Casualties

In this accident, total four contractor workers died on the spot due to multiple injuries. After the accident there was no person reported to OHC for any injury or any complaint related to body part.

**TIME LINE**

Date DDMMYY	Time (Hr:Min)	Event/Activity
30/11/2024	09:00 to 20:00	The Team of workers of Contractor consists of nine persons reported on duty and worked on the providing steps and platform for the Feed Tank 1. (Attendance Sheet and Statement)
30/11/2024	12:26	The four workers of the Contractor were found shifting the channels, plates with the help of a trolley from Fabrication workshop to the Site (Feed Tank 1) (CCTV Footage of Store Road2)
01/12/2024	09:00 to 14:00	The Team of Contractor consists of six persons reported on duty and worked on the providing steps and platform for the Feed Tank 1. The job was carried out on the ground near the tank. (Attendance Sheet)
02/12/2024	09:00 to 18:00	The Team of Contractor consists of eight persons reported on duty and worked on the providing steps and platform for the Feed Tank 1. They have prepared some of the material for hand railing in Maintenance Workshop / Fabrication yard. (Attendance Sheet and Statement)
03/12/2024	09:00	On the day of the accident, the team of eight persons including their Supervisor reported at site. All plant of Detox India Pvt. Limited were working normally and all other activities were normal. After Tool Box Talk and permit issuance they started setting up for the job of providing Hand Railing on the top of the Feed Tank 1 of Spray Dryer Plant. (Attendance Sheet and Statement)
03/12/2024	11:30	The Mechanical Engineer while he was passing by and going for checking the job of pressure tube he has seen the team working on the ground near the tank. (Interview)



Date
DDMMYY

Time
(Hr:Min)

Event/Activity

03/12/2024 12:40 Accident occurred – The explosion shook the area damaged the roof and connected accessories. All four persons who were working on the top of the tank were also thrown away and fell in different direction inside and outside the plant premises. The Tank top roof cover flew off and fell approx. 20 mtr on ground which is across the road from the tank in the plant premises. The connected piping also flew off and fell near the roof. The segment of the hand railing of different sizes fell in all the directions on the roof of nearby buildings, road and terrace.(Site evidence, CCTV Footage, Statement)

03/12/2024 12:40 Hearing the blast, all the present employees rushed to the site for helping and rescue. There is no sign of any Fire or any subsequent event, the team initiated the rescue operations with internal resources. The contractor workers started running outside. (CCTV footage and Site condition)

03/12/2024 12:41 Company Ambulance entering the plant premises (CCTV footage)

03/12/2024 12:42 Safety Team arranged to cordon the accident area with help of danger tape and arranged the blankets to cover the body of the victims.

03/12/2024 12:50 Information given to Police and informed about the Serious accident.

03/12/2024 13:05 Head count was carried out and it was noted that total four persons are missing. Search operation was initiated.

One of the victims was found inside the blade area of Cooling Tower fan. He was rescued and brought to the ground. (Interview with Safety Team)



Date DDMMYY	Time (Hr:Min)	Event/Activity
03/12/2024	13:25	It was informed that fourth person is still not traceable. The search inside and outside the premises started.
03/12/2024	13:30	Police reached the plant premises and took over the charge.
03/12/2024	15:10	Fourth person was traced outside the plant boundary and company ambulance sent outside the gate near boiler and brought him inside the premises. (CCTV footage)
03/12/2024	16:18	First outside Ambulance reached at site.
03/12/2024	17:01	Four Ambulances went outside with bodies of the victims. The vehicles of Police and other authorities went outside.
03/12/2024	17:05	Search operations was carried out for casualties and pieces of scattered material but no other causalities reported.

**KEY CONTRIBUTORY FACTORS :**

Sr. No.	FACTOR INFLUENCING	OBSERVATIONS
1.	HUMAN	<p>The contractor workers were working on the top of the Tank at the time of accident. They were involved in mechanical jobs which could generate the sparks.</p> <p>There was no direct witness who has seen the team working on the top of the tank or accident.</p>
2.	TECHNICAL	<p>The tank contains the Industrial effluents received from various industries as Hazardous Waste. The presence of flammable gases from the effluent might have generated inside the tank.</p> <p>The tank was in process and loading and unloading continuously. This allowed the oxygen presence in the tank.</p> <p>The spark from some source set this mixture on flash fire. The flash fire have generated over pressure inside the tank.</p> <p>The HAC drawing was also not having the tank area identified for any Zone classification.</p> <p>The vent was not allowed to release the evaporation / gases.</p>
3.	ORGANIZATIONAL	<p>The hazard of presence of flammable gases were never identified or thought of.</p> <p>The acceptance criterial for receipt of the Industrial effluent and treatment parameter were based on the Lab test. These tests does not include the presence of volatile substances in the sample.</p>
4.	ENVIRONMENTAL	<p>There would have been generation of the flammable gas entrapped inside the tank.</p>



HYPOTHESIS

Based on above mentioned facts, interview of plant personnel and contractors' workers, CCTV footage, site conditions – locations of scattered material / equipment, and statement of direct / indirect witness, it was found that there was flash fire inside the closed tank having very limited vent and that led to the over pressure inside the tank. The whole tank lifted up few inches and the roof of the tank got detached from the weld joint and fallen down on the floor.

All the persons who were working on the tank roof were died on the spot and there was no direct witness who has seen them working on the tank. Based on the circumstantial evidence and statement, it was defined that the team was working on the roof of the tank. The detachment of the roof was because of over pressure generated due to flash fire. The possibility of flash fire was due to

1. Fuel : The presence of Flammable gas inside the tank. The generation of the gas inside the gas might have due to Industrial effluent which might have high in volatile compounds.
2. Oxygen : Repeated Loading / unloading of effluent from / to the tank has allowed the ambient air to enter in the tank
3. Spark / Heat : The possible reasons behind the generation of Spark or heat which ignited the mixture of fuel and air -
 - a. Static Electricity : As the tank is earthed / grounded, the generation of the static electricity is nullified.



- b. Electrical Spark : No electrical equipment on the tank near the vicinity of vent.
- c. Hammering : There was no hammer observed in the vicinity.
- d. Hot work – Welding/ Grinding : The evidence related to welding – the welding cables were found and pieces of the welding electrodes were found on the ground. It is pertinent to note that if the welding machine is connected closest electrical source, then the welding could not have been carried on top of the tank as the cable was not sufficiently long for the same. The numbers of welding electrodes were found near the roof of the tank on the ground.

Based on the scenario, the available photographs, CCTV footage, the position of the fallen roof of the tank, the presence of fallen welding electrodes, the absence of any eye witnesses, and the scattered pieces of material, the exact cause of the sparks remains unknown. On detailed investigation / analysis of the evidence, that activities such as welding, grinding have been carried out on the ground.

However, there is no direct observation of these activities, and they were not captured on any CCTV footage. As a result, the possibility of ignition from an unidentified or unknown source cannot be ruled out.



ANNEXURE

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ANNEXURE 1 FACTORY LICENSE


Directorate Industrial Safety & Health
 Gujarat State
FORM NO. 4
 (Prescribed under Rules 5)
FORM NO. 4
 License to work a factory
 (Prescribed under Rule 5)

Registration No. 1234/20116/2015 License No. 27929
 FIN. S06027929A D.A. 01-Apr-2016

License is hereby granted to
Mr. HIRAL PARIMAL DESAI + 4 DIRECTORS
 For the premises known as
DETOX INDIA PRIVATE LIMITED
 situated at
PLOT NO.7921-22-23 GIDC ESTATE ANKLESHWAR
 Ta.: Anklesvar Dist.: Bharuch

for use as a factory within the limits specified in the plan approved by the
Director Industrial Safety & Health, Gujarat State
 vide No. 1995 Date 02-Nov-2015 subject to provisions of the
 Factories Act, 1948 and the Rules made thereunder.

The license is issued for:

- Maximum Number of workers to be employed on any day during the Year : ****2,000****
- Maximum installed power in B.H.P. on any day during the year : ****Above 5000****

The license is valid up to 31st December 2024,

Fees paid Rs. 182,100.00
 Fees due Rs. 182,100.00
 Excess Rs. 0.00
 Place : Bharuch
 Date : 04-Dec-2021



Signature valid

Digitally signed by VASANT DIPAKKUMAR KANTILAL
 Date: 2021.12.04 11:06:00 +05:30
 Reason: Approval
 Location: Bharuch

Deputy Director
Industrial Safety and Health
Bharuch

108351



ANNEXURE 2 OHS POLICY

OCCUPATIONAL HEALTH & SAFETY POLICY**DETOX INDIA**
operated by **VEOLIA**

DIPL, operated by VEOLIA clearly understands the role of health and safety management in sustainable development as essential business management elements for business operations.

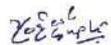
We at DIPL, operated by VEOLIA provide safe working place to our employees and other stakeholders as an integral part of our business philosophy and value system. We will continually improve the effectiveness of our Occupational Health and safety (OHS) performance in our activities, products and services through implementation of an OHS management framework.

For achieving the above we are committed to:

- Ensuring compliance to all applicable OHS Legal requirements & other requirements.
- Eliminate, minimize and / control occupational health and safety risks by usage of appropriate technology and OHS management practices at all levels and functions.
- Continually improve the OHS performance by setting objectives and targets to prevent and eradication of occupational accidents and disease in the workplace.
- Investigating all work place accident/incidents in order to correct any unsafe practices/conditions & reduce the impact on Occupational Health and Safety.
- Enhance awareness, skill and competence of our employees, workers and contractors/ suppliers through effective communication & training to enable them to demonstrate their involvement, responsibility and accountability for OHS Compliance & improvement.
- We shall ensure that there is never delay to address safety issues or hesitate to improve safety related conditions regardless of cost, time or practice.
- We shall ensure and is expected from all employees to be familiar with the proper emergency response procedures as well as proper health and safety policies.
- We shall ensure and all stakeholders and interested parties understand the importance of health and safety and strictly follow safety policies.
- All employees have responsibilities towards their managers or health and safety department to immediately report any threats to health and safety.
- All employees are require to constantly improve safety related conditions and willingly identify every possible threat to security and health.
- We shall review OH&SM policy periodically for its continual suitability & sustainability.

As members of the future global top player in waste management & energy solutions all DIPL employees are committed to comply with above policies, respecting life, accomplishing social responsibility, and contributing to maintain the safest and healthiest work environment.

Date:13.10.2022


Yogesh Gupta
Chief Operating officer



ANNEXURE 3 QHSE IMS POLICY

**INTEGRATED MANAGEMENT SYSTEM
(IMS) QHSE POLICY**

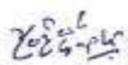
DIPL, operated by VEOLIA clearly understands the role of Quality, Environment, and Occupational Health & Safety Management Systems in sustainable development as essential business management elements for business operations.

For achieving the above we are committed to:

- ✓ We shall treat & resource all our waste management operations in view of National, International and Customer requirements, also safeguarding our environment, the interest of our employees, stakeholders, and commitment towards client satisfaction.
- ✓ We shall ensure for continual improvement and strive to satisfy customers, employees, suppliers & communities through continuous improvement of products, service, processes & waste minimization by proactive management system & good housekeeping.
- ✓ We shall continuously monitor the environment aspects arising due to our various activities, study their impact and implement corrective measures wherever necessary to prevent environment & quality risks.
- ✓ We shall ensure to meet and exceed all applicable Quality, Environmental & Occupational Health & Safety legal requirements & other requirements from time to time.
- ✓ Eliminate, minimize and control Occupational Health and Safety risks by usage of appropriate technology and OHS management practices at all levels and functions by continually improving OHS performance by setting objectives and targets to prevent and control of occupational accidents and disease within the workplace.
- ✓ Enhance awareness, skill and competence of our employees, workers and contractors/suppliers through effective consultation, participation & training to enable them to demonstrate their involvement, responsibility and accountability for OHS Compliance & improvement.
- ✓ We shall review and ensure that our business practices, services are aligned with our IMS policy and goal for its continual suitability and sustainability.

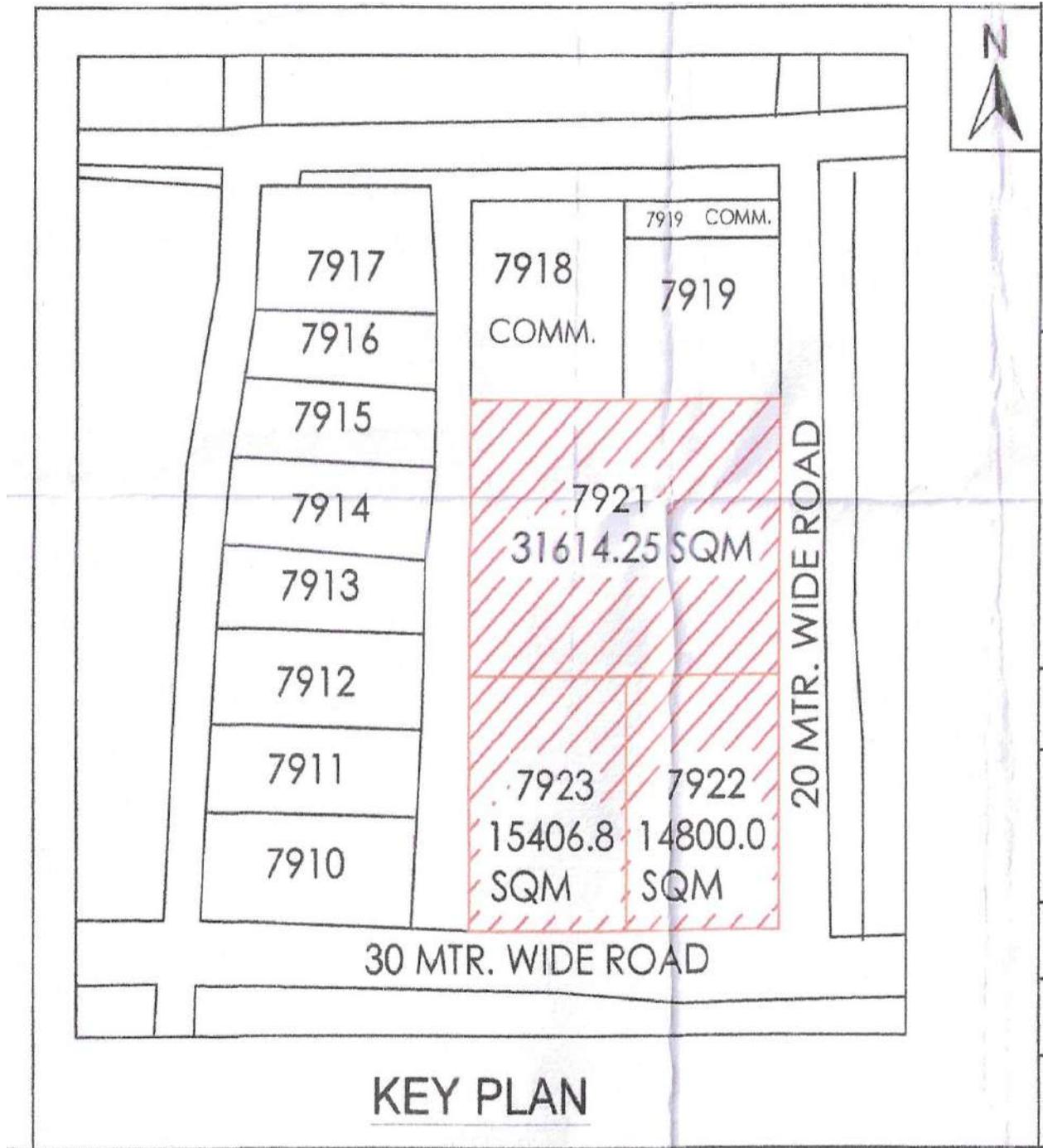
As members of the future global top player in waste management & energy solutions all DIPL employees are committed to comply with above policies, respecting life, accomplishing social responsibility, and contributing to maintain the safest and healthiest work environment.

Date:13.10.2022


Yogesh Gupta
Chief Operating officer



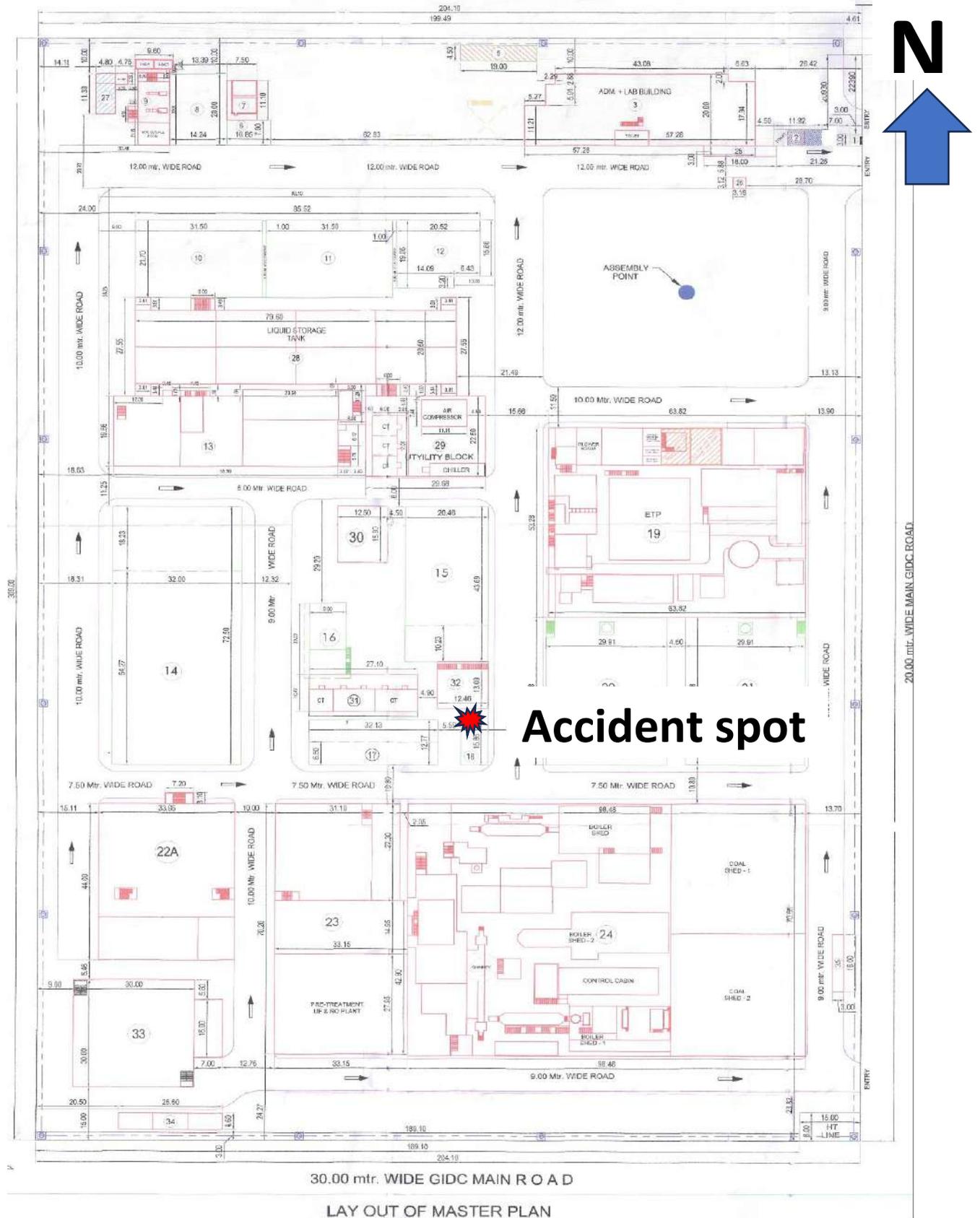
ANNEXURE 4 KEY PLAN



KEY PLAN



ANNEXURE 5 FACTORY LAYOUT AND ACCIDENT SPOT



30.00 mtr. WIDE GIDC MAIN ROAD

LAY OUT OF MASTER PLAN

**282**

CONFIDENTIAL AND PRIVILEGED

SOLOMAX FIRE SOLUTIONS LLP

ANNEXURE 6 CONSOLIDATED CONSENT & AUTHORIZATION (CC&A) (First Page of CC&A)



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

BY R.P.A.D.

NO: GPCB/ANK/CCA-1360(7)/ID-32798/

DT. ___/09/2021

CCA NO. AWH-113467

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 rule 6(2) of the Hazardous & Other Waste (Management and Trans-Boundary Movement) Rule-2016, framed under the E(P) Act-1986.

And whereas Board has received consolidated application dated 06/03/2021 with inward no. 190252 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.

CONSOLIDATED CONSENT AND AUTHORISATION:

(Under the provisions/ rules of the aforesaid environmental acts)

To:
M/s. DETOX INDIA PVT. LTD. (DIPL),
PLOT NO: 7921-22-23,
GIDC ESTATE ANKLESHWAR,
DIST BHARUCH.

1. Consent Order No: AWH-113467, date of issue 28/06/2021.
2. The consent under Water Act -1974, Air Act -1981 and Authorization under Environment Protection Act, 1986 shall be valid up to 29/03/2026 to operate following facility.

No.	Name Of Equipment/ Facility	Total Quantity
1	Common effluent treatment plant (for MEE condensate & scrubbing solution for in-house treatment)	2.1 MLD
2	Ammonia/ VOC stripping	1800 KL/day
3	MEE/MVR with ATFD & Centrifuge	1800 KL/day
4	MVR	150 KL/day
5	Conventional ETP (2 stage Aeration with MBR & RO)	1620 KL/day
6	Spray Dryer (to achieve zero discharge)	2 nos. x 250 KL/day
7	Steam Boiler	18.5TPH x 1 Nos Boiler
8	Power Generation	1 no. X 4.8 MW = 4.8MW though back pressure turbine
9	Integrated Common Boiler Facility	120 TPH (60 TPH X 2 nos.)
10	Boiler water preparation unit	900 Kl/day
11	MVR only for treatment of Boiler Water preparation plant RO Reject	1 no. X 300 KL/day

Page 1 of 14

Clean Gujarat Green Gujarat

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

LKD INDIA



ANNEXURE 7 FORM NO 37 WORK PLACE MONITORING

(Amonia,H2S,CS2,Nox,RSPM,SO2,Total Dust are also being done)

FORM NO. 37

(Prescribed under Rule 12-B)

Register containing particulars of monitoring of working environment required under Section 7-A (2) (e).

CUSTOMER'S NAME AND ADDRESS : M/s. DETOX INDIA PRIVATE LIMITED

PLOT NO. - 7921-23, GIDC ESTATE, ANKLESHWAR,

DIST - BHARUCH, ANKLESHWAR - 393002.

DATE: 23.11.2024

Name of the Department/Plant **SPD Plant**
 Raw materials **Not Applicable**
 By-products **Not Applicable**
 Finished products **Not Applicable**
 Particulars of sampling **TVOC**

Sr. No	Location/ Operation Mentioned	Identified Contaminant	Sampling Instrument Used	Airborne Contamination			STEL concentration (As given In second schedule)	Reference Method	Number of workers exposed at the location being monitored	Remarks	Signature of person taking samples	Name (in block letter)
				No. of samples	Range	Average ppm						
1	2	3	4	5	6	7	8	9	10	11	12	13
1	SPD Plant	TVOC	BY VOC METER	1	0.1-200 ppm	4.3	Not Specified	BY VOC METER	15 person working At Sampling Time	-		Mr. Mukesh Patel

STEL: Short Term Exposure Limit.





ANNEXURE 8 WORK PERMIT FORM

(Sample copy of one of the Permit Form)



HOT WORK PERMIT



Permit No. **HOWP0001**

In case of emergency dial : **+91 9924445138**
Intercom emergency dial : **5000**

Routing of Permit : Permit Owner→ Permit Executor→ HOD of Permit Owner→ HOD of Executor→ Safety Officer			
Location of the works: Department:	Plant Area:	Equipment:	
Description of the works:			
Permit validity: From Date:	Time:	To Date:	Time:

CHECK LIST	
1) Whether the operations in the surrounding area suspended in order to prevent leakage / splash of inflammable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2) Whether the surrounding drain outlets of the plant / section where flammable materials are handled are isolated by putting sand bag blocks?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3) Is the surrounding atmosphere <u>is</u> free from inflammable / explosive gas by means of suitable gas detector (0% LEL)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4) For welding outside the vessel	
a) Is the vessel cleaned and filled with water up to the brim?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b) Are all incoming and outgoing pipelines disconnected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
c) Is proper ventilation provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No
5) Is welding CAUTION sign board provided at the spot?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6) Is the area around the weld spot cleaned and ensured for is it make sure that it is free of combustibile material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7) Whether exhaust / blower is provided for ventilation?	<input type="checkbox"/> Yes <input type="checkbox"/> No
8) Whether all the required personal protective equipment provided and made ready for at the designated Hot work permit location?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9) Whether proper escape ensured available and free of obstacle?	<input type="checkbox"/> Yes <input type="checkbox"/> No
10) Whether combustibile materials are protected (kept 35 ft away from the place of hot work)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
11) Is the nearest fire hydrant facilities <u>are</u> functional and is running water hose connection from the same provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No
12) Which type of Fire Extinguisher required? _____ and is it available at the work location?	<input type="checkbox"/> Yes <input type="checkbox"/> No
13) This type and quantity of fire Extinguisher is available at work location / agency?	<input type="checkbox"/> Yes <input type="checkbox"/> No
14) Is Fire marshal designated? If Yes, his name	<input type="checkbox"/> Yes <input type="checkbox"/> No
15) Is the site of hot work enclosed from all sides with fire blanket(preferably Silicon coated glass fiber / GI Sheet / Ceramic fiber fabrics?	<input type="checkbox"/> Yes <input type="checkbox"/> No
16) Whether trained persons taking up the job?	<input type="checkbox"/> Yes <input type="checkbox"/> No
17) Are the earthing & electrical insulations proper?	<input type="checkbox"/> Yes <input type="checkbox"/> No
18) Is the power cables in the vicinity protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
19) Whether portable tools double insulated / properly earthed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
20) Whether the NRV / Flash back Arrestor provided in the cutting nozzles and the cylinder outlet?	<input type="checkbox"/> Yes <input type="checkbox"/> No
21) Whether the compressed gas cylinders located at a safe distance(preferably 5 m) from the area of hot work and protected from sparks?	<input type="checkbox"/> Yes <input type="checkbox"/> No
22) Is LOTO system available? If yes, then is the LOTO work permit taken? Its number : _____	<input type="checkbox"/> Yes <input type="checkbox"/> No
Lock nos : _____	<input type="checkbox"/> Yes <input type="checkbox"/> No
Tag no : _____	<input type="checkbox"/> Yes <input type="checkbox"/> No

I declare that I have fully understood the nature of the job, hazards involved and safety requirements for the same. I will fully adhere to the safety norms written in this permit before, during and upon completion of the stated work. I certify that I have checked the safety precautions as per the checklist for carrying out the work & found to be adequate & safe and all concerned persons have been explained the above precautions. All the below persons are free from any ailments such as vertigo, epilepsy and low/high blood pressure.

Doc. No. DIPL/ANK/EHS/HOWP/003



HOT WORK PERMIT

VEOLIA DETOX PARTICIPANT DETAILS			
	Name	Phone Number	Signature
Permit Owner			
Permit Owner's HOD			
Permit Executor			
Permit Executor's HOD			
Safety Officer			

CONTRACTORS DETAILS			
We hereby certify that we have all appropriate H&S information, in particular, but not only, general safety rules applicable to the site and emergency response plan. We also certify that we own and use proper PPEs as above mentioned.			
Name of the agency:			
Workers names:			
Agency Supervisor	Name	Phone Number	Signature

OTHER INFO			
Date and time:			
Remarks:			
Name and signature:			

PERMIT EXTENSION OR HANDOVER			
The new Permit Owner certifies that he is fully aware of the above elements. He is responsible for the continuation of their implementation and for the full information of any new person involved within this Work Permit.			
Date and time of extension/handover:			
New Permit expiry date and time:			
	Name	Signature	
Initial Permit Owner			
New Permit Owner			
New persons involved (specify position)			

PERMIT TERMINATION			
Termination Date and time:		Job completed: <input type="checkbox"/> Yes <input type="checkbox"/> No	
1) Area/equipment clear from all debris, tools, equipment, scrap or any unwanted material Lock out Tag out removed and all forms of energy restored		<input type="checkbox"/> Yes <input type="checkbox"/> No	
2) Machine guards / Safety Interlocks / nut-bolts / jumpers back in place		<input type="checkbox"/> Yes <input type="checkbox"/> No	
3) Temporary fire extinguisher removed from the area		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other:			
	Name	Signature	
Agency Supervisor			
Permit Owner			
Permit Owner's HOD			

Doc. No. DIPL/ANK/EHS/HOWP/003



ANNEXURE 9 ELECTRICAL TOOL INSPECTION STICKERS

SAFETY FIRST, WORK SAFE	ELECTRICAL DEPARTMENT
<input type="checkbox"/> 1. Double earthing is provided. <input type="checkbox"/> 2. Armored power cable laid. <input type="checkbox"/> 3. Cable glands provided. <input type="checkbox"/> 4. Cable termination lugs used. <input type="checkbox"/> 5. ELCB/RCCB 30 mA protection provided for all out going sockets. <input type="checkbox"/> 6. Danger sticker provided on panel. <input type="checkbox"/> 7. Emergency stop P.B. is provided. <input type="checkbox"/> 8. Power on indication is provided. <input type="checkbox"/> 9. Door lock arrangement provided. <input type="checkbox"/> 10. ELCB/RCCB tested and ok.	SR.No. : Electrical inspection certification for electrical power distribution board Inspection date : Next inspection due : Inspection done by :
CERTIFIED FOR OPERATE	 VEOLIA Detox India Pvt. Ltd. Plot No. 7921/22/23, GIDC Ankleshwar, Tal - Ankleshwar, Bharuch - 393002 SAFETY FIRST, WORK SAFE ELECTRICAL DEPARTMENT

ELECTRICALLY NOT SAFE TO OPERATE DO NOT USE
SAFETY FIRST, WORK SAFE ELECTRICAL DEPARTMENT Detox India Pvt. Ltd. Plot No. 7921/22/23, GIDC Ankleshwar, Tal - Ankleshwar, Bharuch - 393002
ELECTRICALLY NOT SAFE TO OPERATE DO NOT USE
SAFETY FIRST, WORK SAFE ELECTRICAL DEPARTMENT Inspection date : inspection done by :
ELECTRICALLY NOT SAFE TO OPERATE DO NOT USE
SAFETY FIRST, WORK SAFE ELECTRICAL DEPARTMENT

SAFETY FIRST, WORK SAFE	ELECTRICAL DEPARTMENT
<input type="checkbox"/> 1. Double earthing is provided. <input type="checkbox"/> 2. Armored power cable laid. <input type="checkbox"/> 3. Cable glands provided. <input type="checkbox"/> 4. Cable termination lugs used. <input type="checkbox"/> 5. ELCB/RCCB 30 mA protection provided for all out going sockets. <input type="checkbox"/> 6. Danger sticker provided on panel. <input type="checkbox"/> 7. Emergency stop P.B. is provided. <input type="checkbox"/> 8. Power on indication is provided. <input type="checkbox"/> 9. Door lock arrangement provided. <input type="checkbox"/> 10. ELCB/RCCB tested and ok.	SR.No. : Electrical inspection certification for electrical power distribution board Inspection date : Next inspection due : Inspection done by :
CERTIFIED FOR OPERATE	 VEOLIA Detox India Pvt. Ltd. Plot No. 7921/22/23, GIDC Ankleshwar, Tal - Ankleshwar, Bharuch - 393002 SAFETY FIRST, WORK SAFE ELECTRICAL DEPARTMENT



ANNEXURE 10 DETAILS OF HEAD COUNT

Date: 03/12/2024

Sr No	Emp Code	Name	Department	Remarks	Strength
1	300602	Dharmendra Parmar	ACCOUNTS		1
2	300065	Nimish Ranchhod Kyada	BOILER		2
3	300211	Sandip Bhanu Bhakhar	BOILER		
4	300613	Nikhil Mokariya	EHS		2
5	300587	Pradhumn Purohit	EHS		
6	300084	Ashfaq Nazir Ahmad Katarikwala	ELECTRICAL		
7	300513	Bharat Patel	ELECTRICAL		
8	300509	Jerish Patel	ELECTRICAL		
9	300212	Kesharsing Vechna Vasava	ELECTRICAL		
10	300599	Kiran Gohil	ELECTRICAL	Gatepass	9
11	300095	Kirit Kanaksinh Rana	ELECTRICAL		
12	300174	Mohit Rakeshkumar Lalwala	ELECTRICAL		
13	300606	Narendra Prajapati	ELECTRICAL		
14	300044	Nishant Dipakkumar Modi	ELECTRICAL		
15	300335	Arun Shambhu Mishra	ETP		
16	300532	Deepu Rajbhar	ETP		
17	300529	Dinesh Parmar	ETP		
18	300520	Jatin Vasoya	ETP	Gatepass	8
19	300318	Niraj Ravindra Paswan	ETP		
20	300525	Rajkishor Patel	ETP		
21	300383	Kaushik Suresh Patravadiya	ETP / RO		
22	300380	Virendra Babubhai Vasava	ETP / RO		
23	200009	Brijesh R Panchal	HR & ADMIN		
24	300535	Patel Bhavikumar Farsubhai	HR & ADMIN		3
25	300173	Vikas Ganesh Prasad	HR & ADMIN		
26	300549	Gopal Daxeshgiri	INSTRUMENT		
27	300106	Hitesh Neturabhai Prajapati	INSTRUMENT		3
28	300090	Manish Dhirendrasinh Niyola	INSTRUMENT		
29	300548	Gaurang Parmar	LOGISTICS		2
30	300582	Hemant Suryavanshi	LOGISTICS		
31	300546	Pradip Jadhav	MAINTENANCE		
32	300588	Shantaram Gokul Patel	MAINTENANCE		
33	300601	Vivalkumar Machhi	MAINTENANCE		
34	300225	Bharat Parsottambhai Patel	MECHANICAL	Gatepass	
35	300188	Dhvanit Prashant Shroff	MECHANICAL		10
36	300117	Dolatsinh Mamrasaheb Dayma	MECHANICAL		
37	300235	Jayesh Vanabhai Vasava	MECHANICAL		
38	300521	Jayashbhai Rahit	MECHANICAL		
39	300511	Rahul Vasava	MECHANICAL		
40	300196	Ramroshan Ramchhola Prasad	MECHANICAL		
41	300292	Ritesh Ambalal Chauhan	MEE		2
42	300118	Rammurti Rambhosh Yadav	MEE		
43	300167	Rajesh Jankidas Kubevat	MWRE		1
44	300277	Shonika Prakash Ram Sharan Singh	OPERATION		2
45	300564	Dharmendra Chothari	OPERATION		
47	300209	Ravi Shankarlal Advani	PROJECT		2
48	300287	Yogesh Gurantrao Mistry	PROJECT (CIVIL)		
49	300018	Vijay Mohan Patel	PT		1
50	300128	Ashwinbhai Bhikhabhai Gohil	QAC-LAB		
51	300097	Rhackeranand Parmanand Bhatt	QAC-LAB		
52	300131	Dnyaneshwar Shantaram Jadhav	QAC-LAB		
53	300573	Meril Patel	QAC-LAB	Gatepass	
54	300148	Kamlesh Bhagwanbhai Chauhan	QAC-LAB		
55	300047	Kishorechandra Bhagubhai Patel	QAC-LAB		
56	300135	Mayurkumar Ashikbhai Shah	QAC-LAB		13
57	300850	Niralihee Patel	QAC-LAB		
58	300137	Pratapsinh Pravinsinh Chauhan	QAC-LAB		
59	300615	Sahil Gondaliya	QAC-LAB		
60	300139	Sanjaykumar Devnath Rajbhar	QAC-LAB		
61	300250	Vivek Harinath Gautam	QAC-LAB		
62	300622	Asha Gondaliya	QAC-LAB		
63	300179	Vishal Ghanderi	SD PLANT		2
64	300091	Dhakar Sakheram Desai	SD PLANT		
64	300602	Suresh Palas	STOREE		1
65	300585	Kirit Dhokiya	UGPT		
66	300074	Peresh Keshavbhai Patel	UGPT		2

62
 66
 - 4 GP
 62



ANNEXURE 11 PERMIT UNDER WHICH THE JOB CARRIED OUT



HOT WORK PERMIT



DETOX INDIA
powered by VEOLIA

1097

Permit No. HOWP

In case of emergency dial : +91 9924445138
Intercom emergency dial : 5000/5090

Routing of Permit : Permit Owner → Permit Executor → HOD of Permit Owner → HOD of Executor → Safety Officer		
Location of the works: Department: SD	Plant Area: SD	Equipment: 75 KL tank - J
Description of the works: SD plant 75kl - tank - 1 top fitting fabrication work.		
Permit validity: From Date: 3/12/24 Time: 9:45 AM To Date: 3/12/24 Time: 6:00 PM		

CHECK LIST	
1) Whether the operations in the surrounding area suspended in order to prevent leakage / splash of inflammable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2) Whether the surrounding drain outlets of the plant / section where flammable materials are handled are isolated by putting sand bag blocks?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3) Is the surrounding atmosphere is free from inflammable / explosive gas by means of suitable gas detector (0% LEL)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4) For welding outside the vessel	
a) Is the vessel cleaned and filled with water up to the brim?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b) Are all incoming and outgoing pipelines disconnected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
c) Is proper ventilation provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No
5) Is welding CAUTION sign board provided at the spot?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6) Is the area around the weld spot cleaned and ensured for is it make sure that it is free of combustible material?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7) Whether exhaust / blower is provided for ventilation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8) Whether all the required personal protective equipments provided and made ready for at the designated Hot work permit location?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9) Whether proper escape ensured available and free of obstacles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10) Whether combustible materials are protected (kept 35 ft away from the place of hot work)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
11) Is the nearest fire hydrant facilities are functional and is running water hose connection from the same provided?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12) Which type of Fire Extinguisher required? <u>ABC</u> and is it available at the work location?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13) This type and quantity of fire Extinguisher is available at work location / agency?	<input type="checkbox"/> Yes <input type="checkbox"/> No
14) Is Fire marshal designated? If Yes, his name	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15) Is the site of hot work enclosed from all sides with fire blanket(preferably Silicon coated glass fiber / GI Sheet / Ceramic fiber fabrics?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16) Whether trained persons taking up the job?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
17) Are the earthing & electrical insulations proper?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
18) Is the power cables in the vicinity protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
19) Whether portable tools double insulated / properly earthed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
20) Whether the NRV / Flash back Arrestor provided in the cutting nozzles and the cylinder outlet?	<input type="checkbox"/> Yes <input type="checkbox"/> No
21) Whether the compressed gas cylinders located at a safe distance(preferably 5 m) from the area of hot work and protected from sparks?	<input type="checkbox"/> Yes <input type="checkbox"/> No
22) Is LOTO system available? If Yes, then mention its LOTO Permit Number : _____	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Lock no. : _____	
Tag no. : _____	

I declare that I have fully understood the nature of the job, hazards involved and safety requirements for the same. I will fully adhere to the safety norms written in this permit before, during and upon completion of the stated work. I certify that I have checked the safety precautions as per the checklist for carrying out the work & found to be adequate & safe and all concerned persons have been explained the above precautions. All the below persons are free from any ailments such as vertigo, epilepsy and low/high blood pressure.

ensure that permit to be empty.

Doc. No. DIPL/ANK/EHS/HOWP/003



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CONFIDENTIAL AND PRIVILEGED

SOLOMAX FIRE SOLUTIONS LLP



HOT WORK PERMIT



VEOLIA DETOX PARTICIPANT DETAILS

Name	Phone Number	Signature
Permit Owner: Vishal Bhawani	5069	<i>[Signature]</i>
Permit Owner's HOD: Bhaykar Datt	5070	<i>[Signature]</i>
Permit Executor: Dhvanid	5063	<i>[Signature]</i>
Permit Executor's HOD: Dhvanid shroff	5063	<i>[Signature]</i>
Safety Officer: Nikunj	1090	<i>[Signature]</i>

CONTRACTORS DETAILS

I hereby certify that we have all appropriate H&S information, in particular, but not only, general safety rules applicable to the site and emergency response plan. We also certify that we own and use proper PPEs as above mentioned.

Name of the agency: Pan Laxmi - Ti Fab			
Workers names: podush, Harivardh, Adhok, Mukesh			
Agency Supervisor: Rohit	Name	Phone Number	Signature
			<i>[Signature]</i>

CASUAL AUDIT

Date and time: _____
 Remarks: _____
 Name and signature: _____

PERMIT EXTENSION OR HANDOVER

The new Permit Owner certifies that he is fully aware of the above elements. He is responsible for the continuation of their implementation and for the full information of any new person involved within this Work Permit.

Date and time of extension/handover: _____
 New Permit expiry date and time: _____

Name	Signature
Initial Permit Owner	
New Permit Owner	
New persons involved (specify position)	

PERMIT TERMINATION

Termination Date : _____ time: _____ Job completed: Yes No

Area/equipment clear from all debris, tools, equipment, scrap or any unwanted material	<input type="checkbox"/> Yes <input type="checkbox"/> No
Lock out Tag out removed and all forms of energy restored	<input type="checkbox"/> Yes <input type="checkbox"/> No
Machine guards / Safety interlocks / nut-bolts / jumpers back in place	<input type="checkbox"/> Yes <input type="checkbox"/> No
Temporary fire extinguisher removed from the area	<input type="checkbox"/> Yes <input type="checkbox"/> No

Other: _____

Name	Signature
Agency Supervisor	
Permit Owner	
Permit Owner's HOD	

Doc No: DIPL/ANK/EHS/HOWP/003



ANNEXURE 12 HEIGHT WORK PERMIT UNDER WHICH THE JOB CARRIED OUT



HEIGHT WORK PERMIT



Permit No. HEWP **580** In case of emergency dial : +91 9924445138
Intercom emergency dial : 5000/5090

Routing of Permit : Permit Owner → Permit Executor → HOD of Permit Owner → HOD of Executor → Safety Officer

Location of the works: Department: SD Plant Area: SD Equipment: FSKL-1

Description of the works: SP plant FSKL-1 top side peening fabrication work

Permit validity: From Date: 3/12/23 Time: 7:47 PM To Date: 3/12/23 Time: 6:00 PM

CHECK LIST	
Is the area handed over by user department to plant engineering department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
At what height, work needs to be carried out from the floor level? Specify it <u>5</u> meter	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is scaffolding required?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is yes, has it been provided? Is it mechanically strong and free from corrosion and openings?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is Scaffold in good condition and full body safety belt is available / provided? Person should be properly anchored and properly secured.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is required safety equipment and PPE's checked for its good condition? example:-Ladder, Safety net, helmet and Safety belt)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are all persons working at elevation equipped with safety helmet, safety shoes and full body safety harness properly anchored?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the structure/platform on which person is supposed to stand while working is rigid and can bear working person's weight? Whether the structure free from corrosion and other damage and opening?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the working area free from oil and slippery condition?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the area beneath cleared from sharp objects?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If it is not possible to remove sharp object then it must be covered with wooden ply?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Whether the working area barricaded for stopping unauthorised entry?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is "NO ENTRY" board stand kept near entrance of work place area?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Whether the work area clear from overhead electrical lines/protruding structures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
None of the persons working at elevation should be suffering from ailments like low / high blood pressure, vertigo and epilepsy? If so, pl. replace the same by healthy personnel.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Whether the Leather / shock resistant hand gloves used by persons handling molten tar / electrically operated hand tools?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Proper escape routes available and free from obstacle?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
All persons working at elevation are instructed to immediately stop the work in case of high velocity winds / lightning / heavy rains / flammable or toxic fumes / gasses observed during the operation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Whether shoulder bag made of cloth available and always used for carrying tools?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Contract supervisor is present at the job site till the time the job is completed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Scaffolding / ladder used are in good condition and safe for use. Scaffolds are erected as per IS 3696 and have base to height ratio of 1: 3.5 & certified by Manager - Safety?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the area cordoned off using a safety tape and caution sign board is prominently displayed at the site of operation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Whether any harmful gasses being expelled out from exhaust / ducting/pipe near the place of working area? The work place shall be free from oil and slippery condition.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Any other precaution to be taken, Please specify.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

I declare that I have fully understood the nature of the job, hazards involved and safety requirements for the same. I will fully adhere to the safety norms written in this permit before, during and upon completion of the stated work. I certify that I have checked the safety precautions as per the checklist for carrying out the work & found to be adequate & safe and all concerned persons have been explained the above precautions. All the below persons are free from any ailments such as vertigo, epilepsy and low/high blood pressure.

Doc. No. DIPL/ANK/EHS/HEWP/004



VEOLIA HEIGHT WORK PERMIT **DETOX INDIA**

VEOLIA DETOX PARTICIPANT DETAILS

Permit Owner	Name: <i>Bhushan V Bhu</i>	Phone Number: <i>5069</i>	Signature: <i>[Signature]</i>
Permit Owner's HOD	Name: <i>Bhushan D P T Y</i>	Phone Number: <i>5070</i>	Signature: <i>[Signature]</i>
Permit Executor	Name: <i>Dhvanil</i>	Phone Number: <i>5063</i>	Signature: <i>[Signature]</i>
Permit Executor's HOD	Name: <i>Dhvanil Shresth</i>	Phone Number: <i>5063</i>	Signature: <i>[Signature]</i>
Safety Officer	Name: <i>Nimil</i>	Phone Number: <i>5090</i>	Signature: <i>[Signature]</i>

CONTRACTORS DETAILS

I hereby certify that we have all appropriate H&S information, in particular, but not only, general safety rules applicable to the site and emergency response plan. We also certify that we own and use proper PPEs as above mentioned.

Name of the agency: *Panchmar Ti Lab*

Contractors names: *Palush, Haxinath, Mohan, Anil*

Safety Supervisor	Name: <i>Rohit</i>	Phone Number: <i>-</i>	Signature: <i>[Signature]</i>
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CASUAL AUDIT

Date and time: _____

Remarks: _____

Name and signature: _____

PERMIT EXTENSION OR HANDOVER

I, the Permit Owner or contractor, shall be fully aware of the above statements. We are responsible for the safety and health of the workmen and for the full information of any new person involved within this Work Permit.

Date and time of extension/handover: _____

Permit expiry date and time: _____

Permit Owner	Name	Signature
Permit Owner		
Persons involved (specify position)		

PERMIT TERMINATION

Termination Date: _____ time: _____ Job completed: Yes No

Is equipment clear from all debris, tools, equipment, scrap or any unwanted material	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is lock out / tag out removed and all forms of energy restored	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are line guards / Safety interlocks / put-bolts / jumpers back in place	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is temporary fire extinguisher removed from the area	<input type="checkbox"/> Yes <input type="checkbox"/> No

Safety Supervisor	Name	Signature
Permit Owner		
Permit Owner's HOD		

Doc. No. DIPGANK/EHS/HEWP/004



ANNEXURE 13 JOB SAFETY ANALYSIS FOR PARTICULAR JOB

 DETOX INDIA <small>operated by VEOLIA</small>	Detox India Pvt. Ltd., Plot No.: 7921/22/23, G.I.D.C. Estate, Ankleshwar	Doc. No.: DIPLA/EHS/JSA/001 Rev. No.: 00 Effective Dt.: 01/11/2022 Review Dt.:
	Title : Job Safety Analysis (JSA) Procedure	

Annexure 01 DIPLA/EHS/JSA 1001

JOB SAFETY ANALYSIS

Plant	SD plant			
Job Title	ASXL-1 tank topside painting fabrication			
ID /Order No. / PTW No.				
Date: 3/11/24	DIPL / Contractor			
Tag No.	Hot-1097	height - 580		
JSA team / Assessment Team	DPL	DPL	Danchmanji	
Name	Vishal	phanni	pojit	
Role	Team Member <u>S</u> Maint. Engineer HOD			
Generated By	Vishal Bhandari			
Name	(Maker) _____ (Checker) Company / Contractor			
Locations	SD plant			
Job Location :	ASXL-1 tank top side painting fabrication work			
Analysed Job	AS-ke 1			
Job Steps, Hazards, Controls,				
Sr.No. Activities Hazard Required Control Person Responsible				
1	hot work.	hot metal cutting iron	use of proper cutting shield & safety shield	Vishal
2	height work.	fall slip material fall down	use of proper PPEs.	phanni
				pojit

All above activities, Hazards, Controls have been explained to M/s sd plant and are required to be followed by M/s _____



ANNEXURE 14 DETAILS OF THE HOT WORK CARRIED OUT ON THE TANK

SD - 1 - Roof repair & Hand Rail

Details of Work permit System												
Sr. No	Date of Permit	Permit No	Type of work permit	Work description	Permit Owner	Permit Owner's HOD	Permit Executor	Permit Executor HOD	Safety officer	Name of Agency	Contractor Supervisor	Contractor Forement
1	16/07/2024	1016	Hot Work	75KL tank inside rubber coating work	Vishal	For Bhavesh	Nadeem	For Nadeem	Nikhil	unison ind coating	Ravish R Pandey	
2	16/07/2024	549	confined Space	SD plant 75KL Tank inside rubbering work	Vishal	For Bhavesh	Nadeem	For Dhvanil	Nikhil	unison ind coating	Ravish R Pandey	
3	17/07/2024	1011	Hot Work	SD plant 75KL Tank inside rubbering work	Bhavesh	For Bhavesh	Dhvanil	For Dhvanil	J ravi	unison ind coating	Ravish R Pandey	
4	22/07/2024	3354	Height Work	75KL Tank inside rubber coating work	Manish	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	
5	22/07/2024	1016	Hot Work	75KL Tank inside rubber coating work	Manish		Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	
6	22/07/2024	554	confined Space	75KL Tank inside rubber coating work	Manish	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	
7	23/07/2024	3356	Height Work	75 KL tank inside rubber coating	Manish	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	
8	23/07/2024	1017	Hot Work	75 KL tank inside rubber coating	Manish	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	
9	23/07/2024	555	Confined Space	75 KL tank inside rubber coating	Manish	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	
10	23/07/2024	775	Height Work	75 KL 01 tank inside rubber coating work	Vishal	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unison ind coating	Ravish R Pandey	Ravish,rajesh,chandan
11	25/07/2024	1018	Hot Work	75 KL 01 tank inside rubber coating work	Bhavesh	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unison ind coating	Ravish R Pandey	Ravish,rajesh,chandan
12	25/07/2024	556	Confined Space	75 KL 01 tank inside rubber coating work	Vishal	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unison ind coating	Ravish R Pandey	Ravish,rajesh,chandan
13	26/07/2024	779	Height Work	75 KL Efficient tank rubber coating work	Bhavesh	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	Ravish,rajesh,chandan
14	26/07/2024	557	Confined Space	75 KL Efficient tank rubber coating work	Bhavesh	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	Ravish,rajesh,chandan
15	26/07/2024	1019	Hot Work	75 KL Efficient tank rubber coating work	Bhavesh	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unison ind coating	Ravish R Pandey	Ravish,rajesh,chandan
16	27/07/2024	783	Height Work	75 KL Tank Inside rubber coating work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unison ind coating	Ravish R Pandey	Ravish,rajesh
17	27/07/2024	1022	Hot Work	75 KL Tank Inside rubber coating work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unison ind coating	Ravish R Pandey	Ravish,rajesh
18	27/07/2024	558	Confined Space	75 KL Tank inside rubber coating work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unison ind coating	Ravish R Pandey	Ravish,rajesh
19	31/07/2024	1025	Hot Work	75 KL tank sand blasting	Pratik	For Bhavesh	Nadeem	For Nadeem	For Nadeem	Unisons Ind Coating	Arvind mishra	Sanjay,praveen,chandan
20	31/07/2024	789	Height Work	75 KL tank sand blasting	Pratik	For Bhaskar Datir	Nadeem	For Nadeem	Nikhil	Unisons Ind Coating	Arvind mishra	Sanjay,praveen,chandan
21	31/07/2024	559	Confined Space	75 KL tank sand blasting	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unisons Ind Coating	Arvind mishra	Sanjay,praveen,chandan
22	31/07/2024	787	Height Work	75 KL tank blind dismental work	Pratik	For Bhavesh	Nadeem	For Nadeem	Nikhil	Panchmurti	Rohit prasad	Ashok,mukesh,Awal
23	01/08/2024	791	Height Work	75 KL Tank inside blasting work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Indrajeet	Unisons Ind Coating	Arvind mishra	Sanjay,praveen,chandan
24	01/08/2024	792	Height Work	75 KL tank blind dismental work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Indrajeet	Panchmurti	Rohit prasad	mukesh,Awal
25	01/08/2024	1027	Hot Work	75 KL Tank inside blasting work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Indrajeet	Unisons Ind Coating	Arvind mishra	Sanjay,praveen,chandan
26	01/08/2024	560	Confined Space	75 KL Tank inside blasting work	Pratik	For Bhaskar Datir	Dhvanil	For Dhvanil	Indrajeet	Unisons Ind Coating	Arvind mishra	Sanjay,praveen,chandan
27	02/08/2024	795	Height Work	75 KL Tank Rubber Lining work	Bhavesh	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unisons Ind Coating	Arvind mishra	Chandan
28	02/08/2024	796	Height Work	75KL Tank blind opening work	Bhavesh	For Bhavesh	Dhvanil	For Dhvanil	Vijay	Panchmurti	Rohit prasad	mukesh,Awal
29	02/08/2024	561	Confined Space	75 KL Tank Rubber Lining work	Bhavesh	For Bhaskar Datir	Dhvanil	For Dhvanil	Vijay	Unisons Ind Coating	Arvind mishra	Chandan
30	06/08/2024	3360	Height Work	75 KL tank inside rubber coating work	Vicky	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unisons Ind Coating	Arvind mishra	Sandip,sumit,prem
31	06/08/2024	562	Confined Space	75 KL tank inside rubber coating work	Vicky	For Bhaskar Datir	Dhvanil	For Dhvanil	Nikhil	Unisons Ind Coating	Arvind mishra	Sandip,sumit,prem
32	07/08/2024	563	Confined Space	75 KL tank inside rubber coating work	Vicky	For Vicky	Dhvanil	For Dhvanil	Nikhil	Unisons Ind Coating	Arvind mishra	Sandip,sumit,prem
33	07/08/2024	3363	Height Work	75 KL tank inside rubber coating work	Vicky	For Vicky	Dhvanil	For Dhvanil	Nikhil	Unisons Ind Coating	Arvind mishra	Sandip,sumit,prem
34	12/08/2024	564	Confined Space	75 KL tank rubber coating work	Bhavesh	For Bhaskar Datir	Parth	For Parth	Nikhil	Unisons Ind Coating	Arvind mishra	Sandip,sumit,prem



70	02/12/2024	579	height work	75 KL tank railing work and over flow line supporting work	Vicky	Bhaskar Dattir	Dhavnil	For Dhavnil	Pradhumn	panchmuri	Rohit prasad	Paulesh,ashok,harinath,Anil,rajesh
71	03/12/2024	1097	hot work	75 KL tank top side railing work	Vishal	Bhaskar Dattir	Dhavnil	For Dhavnil	Nikhil	panchmuri	Rohit prasad	Paulesh,mukesh,ashok,harinath
72	03/12/2024	580	height work	75 KL tank top side railing work	Vishal	Bhaskar Dattir	Dhavnil	For Dhavnil	Nikhil	panchmuri	Rohit prasad	Paulesh,mukesh,ashok,harinath



STATEMENT OF WITNESSES (INDIRECT)

ANNEXURE - 9A

STATEMENT OF WITNESS (INDIRECT)
DHARMENDRA CHOTHANI (UNIT HEAD)

(214)

I Dharmendra Logambhal Chothani, Age-45 years residing at "AA-902, Kuzikrishna, shreeji sadan residency, Bhusar - 372001", mobile No. 9724328043.

I Dharmendra Logambhal Chothani working with M/s Detox India Pvt. Ltd., KIDC, Ankleshwar as a "General manager - operation" since June 2023, my responsibility is to manage the entire site operation.

The Detox India Pvt. Ltd. a company engaged in treating the hazardous liquid waste water received from various chemicals & pharma industries, my main responsibility as a unit head is to look after smooth running of plant operation, and for that routine activity consist of morning 9:00 to 10:30 AM to check the emails and last 24 hours reports, 10:30 to 12:00 noon I will chair the morning meeting with all HOP of the plants in which we are discussing the plant performance of last 24 hours along with the maintenance activity carried out and also discuss the plan of next 24 hours in terms of operation and maintenance.

on 23rd of January/24 during meeting we have categorically discussed the spray drying tank head gutting work and confirmed that there is no any

(1/4)

Hot work activity performed at top of tanks and
and hot-work fixing will be there.

After completion of morning meeting at around
11:45 Am, I was sitting in my office and checking
the emails. ~~At~~ @ around 12:40 pm heard a
heavy noise (sound) from the spray drying plant
area which I have seen from my office window.

Immediately after wearing 4 PPE rushed towards
the location. Before reaching the incident location
I got the phoe call from Mr. Chundru Parkyn by saying
there is a two fatality at the site. After reaching
at location I have seen spray dryer tank top cover
on the ground (Fall tank) and two injured body
at and front.

Immediately I have informed the incident to
the management (Yogesh Gupta) and immediately
Jk team to search other body of come to know
from Mrs. Panchamurthy Fabricator supervisor (Mrs. Rohit)
that such person engaged in the work. Third body
also found at cooling tower basin, and team searching
for such person but unable to find, meanwhile
I have informed the incident details to APEB & Police
Police officers gathered at site around 1:15 pm and
then I have instructed Chundru Parkyn to be at
main gate due to some serious person accident at
main gate working at the seriousness of the incident.

(3/4)

one of the police officers told me that fourth body is lying at outside of company boundary. then I instructed to our company ambulance driver to go outside for collection of fourth body. Fourth body also reached inside the post and investigation process was going on by the police officers. meanwhile J.J. Chauhan (S.D. Digras) is also reached at site and asking me to provide permits and insurance copy of the deceased person. I have instructed Rishi to take the photocopy of the same and then both the document copy handover to J.J. Chauhan.

now I have moved from incident location to main gate along with DSH Digras to address media if local public at main gate. First SDM give the information to media and then DSH Digras given the information to the media and at last I have given the my interview to the media regarding incident information that there is some urgency at the site without injury to any other person, who is working on SD tank top for handovering sixing work.

Then Mr. Chaitan Vajravel (MLA) reached at site and we were discussing about Ex-gratia amount to the victim's family and at last around 12:00 midnight I have declared some person as approved by municipal.

primarily I have informed one of my colleague Kishik to arrange ambulance for shifting of bodies

(46)

The above statement written by me on my own handwriting without any threat (or) influence of alcoholic condition.

Dharmendra Chaturvedi
03/01/25



ANNEXURE - 9B STATEMENT OF WITNESS (INDIRECT)
BHASKAR DATIR (HEAD- SD PLANT)

26/12/24 (1)

I Bhaskar Salekaran Datir, Age - 64 years,
B-37, Aditya Nagar, Valia Road, GIDC, Ankleshwar
My native place - At - Khambhe,
Tal - Sangamner
Dist - Ahmednagar
(Maharashtra state)
Mobile Number - 8780746388,

I am working in Detox India Pvt
Ltd, GIDC Ankleshwar. working since 2016
as a Manager - Plant. ^{my} Responsibilities are -

1. SD plant production incharge
 - waste receipt from PT plant
 - plant operation as per SOP
 - Shut down activity
 - cleaning of activity
 - Consumables procurement with procurement dept.
 - Guide plant team in day today activity
 - production report preparation.
 - participate in daily production meeting.
 - waste process and down time if any analysis & reporting.
 - keep record of production details.
 - follow up with vendor for material (consumables).

1st Dec 2024 - W/off.
2nd Dec 2024 -
- Mail checking
- MIS report checking

P.T.O.

- attend Production meeting.
- Hot work permit issued at @ 10.00 hrs by Mr. Vicky Chaudhary (Shift IIc) up to 18.00 hr.

3rd Dec 2024 -

- Came to duty at 09.00 hr
- MIS report checking and Production data Preparation.
- Hot work permit issued by Mr. Vishal Bhandari (Shift 1/2) and counter signed by me.
- Attend Production meeting from 10.30 hrs to 11.30h ^{approx.}
- After meeting go to plant and check mail.

Sitting in the office, suddenly I heard big sound @ 12.40 hrs. Then I rush to SD plant to check any abnormal thing, but it was ok. no problem at SD plant side. Again I came to SD plant control room office. By that time all plant people gathered there at incident place. We found one body on road corner in front of tank-1. Second body was found near SD plant entrance. Third body was searched and found near cooling tower area.

- Police official came to incident side.
- Dish official.
- DPMC official and
- GPCB official visited at the accident site and enquired about accident. Major discussion was with my boss ~~at~~ Mr. Dharmendra Sir and C.P. Singh.

Police official enquired regarding incident of Tank-1 and tank material inside.

After detail enquiry of the incident all government official left the site at 18:00 to 18:30 hrs approx except GPCB.

GPCB official left the site around 20:00 to 20:30 hrs approx.

As per instruction of plant head all plant head sectional head are available at office and left the site around 23:30 to 00:30 hrs.

In July 2024 Tank (1) roof & hand railing was corroded so it was given to maintenance for repair/replacement.

After replacement of roof, Tank (1) taken in service in the month of Oct 2024 without hand railing. During meeting in the month of Nov 2024, it was decided to install hand railing at the top.

Probable causes of flash fire & explosion -

1. May be generation of spark.
2. May be presence of flammable mixture in tank.

ANNEXURE - 9 C STATEMENT OF WITNESS (INDIRECT)

BHASKARANAND BHATT (HEAD- LAB.)

31/125 Pg- 1

I Bhaskaranand Paramanand Bhatt, Age- 64 years residing at D-5, Panchamrut Bungalows, Near RajCorner Mall, L.P. Sarani Road, Pat, Surat-395000. My native Place is - Village- Premnagar, P.O. Sidhauri Via- Tilwara, Dist- Rudraprayag - Uttarakhand- 246475. My Mobile No. is 9924441360.

I joined Detox India Pvt Ltd, Ankleshwar since-2016 as a Manager-Laboratory. Since then I am heading the Laboratory at DIPL. My responsibilities are as follows.

Inspection and analysis of incoming waste water. Waste water tankers from different clients.

SPOT TESTS: In which we check presence of Hydrogen Sulphide, Cyanides, flammability and compatibility. Out of these parameters, even if any parameters go out of range, it is rejected there itself.

If the material is OK in spot tests, we proceed further for FINGER PRINT ANALYSIS (pH, TDS, COD, NH₃-N, CV, TSS) - If these parameters are OK with respect to agreed parameter with the client then material is accepted. If not then a discrepancy note is sent to CRM. CRM - takes a call with the client and clears the material (except, CV > 500, NH₃ > 1800ppm and pH < 4.5).

~~Morning meeting~~

Ph. 2

After the operations meeting at around 1130hrs went back to my office and got busy with my routine activities & follow-up in the Laboratory.

At around 1240/1245 Hrs heard a loud sound, Came out of the office and enquired about it with my teammates, alerted them to be ready for evacuation. Went out of the Laboratory through emergency exit and saw people running towards SD control room. Came in and met security staff where I can to know of assembling at the assembly point. Informed my team and we all assembled at the assembly point. As different teams (Police, & other vehicles) entered plant, we returned back to the Laboratory after the head count at assembly point. My rest of the Team left- plant around 06 PM and I stayed back till 11/1130 PM.

Around 1130hrs I returned for home and reached home at around 1145 ~~HR~~ PM.

Recommendation to avoid such incidents in future.

- ① VOC/LEL monitoring before maintenance activity of HOTWORK around the waste water tanks.
- ② Proper venting of tanks to avoid pressure built up in side the tanks.
- ③ Vent Gas analysis (internal/external) can be monitored.

Once the material is found OK, Laboratory sends the tanker for unloading with an appropriate pathway (mcc, SD, MVRE) in the designated tanks. This information is passed on to the operation team (Unloading Area).

Lab further tests samples during pretreatment of the feed to different processing units. (pH, TSS).

After pretreatment, further analysis is carried out at the processing units as per the QA plan. (at mcc, SD & MVRE).

Lab is also involved in - ETP, BOILERS, Cooling tower water, raw water (GIDC) analysis. Coal analysis, treated water analysis.

Coal analysis consists of, Moisture, Calorific value, Volatile matters, Ash content and Sulphur.

GIDC water & treated water analysis consists of pH, TDS, CO₂, NH₃-N, TSS & Total Hardness.

Apart from the regular analysis, we perform analysis for the Development Samples (for the new clients).

On 3rd December 2024, I came to duty at 9 AM. After going through the rolls we had our TBT around 9:30/9:45. At 10:30 attended daily Morning meeting (operations meeting).



ANNEXURE - 9 D STATEMENT OF WITNESS (INDIRECT)
CHANDRA PRAKASH SINGH

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Date
03/01/25

I Chandra Prakash Age: 55 years reside at A-104, Sai Shradha Apartment, Near Jaldal Chokdi GIDC Ankleshwar-393002 Native place Village: Tekanpura, Tehsil: Marjhaul, Distt: → Bagusarai (BIHAR) Mob: 9924148958

I Chandra Prakash working with Detox India Pvt. Ltd., Jitali Road, GIDC Ankleshwar as Dy. GM. - Operation since 20/09/20. My responsibilities are monitoring operation function on day to day basis and ^{evaluation of} performance of operation, I am responsible for quality and cost-effective production.

Detox India Pvt. Ltd. GIDC Ankleshwar is actively engaged in treating the waste generated by various manufacturing industries. The waste (Liquid) received in tankers are being taken inside the factory premises after carrying on the logistics formality. Then it is being weighed on weigh bridge and subsequently reach to sampling point from where the QC people collect sample for analysis. After analysis gets completed the QC person directs the tanker to unloading station and as per QC guidance it is being unloaded to the tank designated for SD. From the Tank the material is being transferred to treatment reactor where the pH of material is being adjusted as per requirement. ~~After~~ once the pH is adjusted the material is sent for filtration to filter press where it TSS

Page: 2

is reduced through filter press. After filter the material is stored in U/G tank. From U/G tank it is transferred to SD feed tank based on requirement. From SD feed Tank the material is sent to SD plant for its treatment. In SD plant the material is fed to atomiser where the water is evaporated by getting in contact of ~~hot~~ hot air. The water gets evaporated passing through the cyclone separator, rapping Perulher. The solid material falls in bottom which is transferred to sludge shed and final it is sent to Landfill for disposal.

On 3rd of December I came on duty at about 09:00 Am in the morning. I reached straightway to my office and engaged in our routine activity. At 10:30 AM our daily production meeting started in Board room and we discussed various issues about production and maintenance. In meeting it was also discussed about the installation of railing on SD feed tank-1. It was instructed by our site head, not to carryout any Hot Work for provision of railing on top. Our meeting was completed at 11:45 AM and I came to my office and engaged in routine activity.

Page-3

At approx. 12:35 PM I heard heavy noise from plant side. After hearing the noise I rushed to the plant side assuming that some abnormality take place inside the SD plant. But after reaching in SD plant I came to know that nothing happened inside the plant. Then I rushed towards Feed tank-1 side and seen that Top Cover of the tank is lying in between SD plant and Feed tank. Simultaneously I have seen the Two nos of dead body lying on the floor. one nearby tank and another nearby SD plant. After that I informed Dharmendra sir about the accident, Meanwhile he also reached at site and engaged in informing the Senior. After 10 minutes he instructed me to move on assembly point and I rushed to assembly point near Main gate. I reached to assembly point and counting the dead with Vikas Prasad and came on conclusion that four persons were missing in dead counting. out of the four two deadbody seen by me as stated above. Some of our employees were searching another two person, after approx. one and half a hour I came to know that another two dead body, Then after it was instructed by Dharmendra sir to look after the gate and

Page: 4

to control the mob. During the control at gate many government official like Collector, Dy. Collector, Senior police official arrived the plant. Then I entered to admin building at approx. 07:00 PM. During the entry of political person I was not involved in ~~managing the various active discuss~~ with authorities. I was involved in managing the drinking water at gate and finally went to home at 11:30 PM.

After arriving duty on 04th December at 09:00 AM and sitting inside my office and moving here and there and discussing about the accident reason. The four workers of Contractor Panchmurti were working on the top of the ~~SD~~ SD Tank No. 1 for provision of railing. As per my knowledge the removal of Top cover from the Tank can be due to some abnormality.

The above statement written by me in my own handwriting without any influence of alcohol or without threat of any agency.

CHANDRA
PRAKASH

ANNEXURE - 9 E STATEMENT OF WITNESS (INDIRECT)

ABHIMANU YADAV (CONTRACTOR - M/s. PANCHMURTI FABRICATOR)

- 9426142343

भाई अभिमनू यादव पंचमूर्ति फॅब्रिकेटर 528316 जी भाई
 डी सी अकलेश्वर मेरिडम 48 में यहाँ रेसिडेन्सीयल इंडरस
 ट्रिग्स कांडूम नं 1 लोडिंग डीसि अकलेश्वर, वत गम कुरेभार
 पोस्ट खीरिया भाता देव गांव जालुगंज आजमगढ़ UP

हमारे मेरिडम का पाइप फॅब्रिकेशन इलेक्ट्रिकल फॅब्रिकेशन
 करता हूँ 2014 से इस जालुगंज में हूँ मेरा फॅब्रिकेशन काम
 जी भाई डी सी अकलेश्वर में अलग अलग कम्प्रीम में चलता
 है। हमारे कम्प्रीम 247/18 से नुडी रोड कम्प्रीम में काम
 करते हैं इतिहास हमारे कम्प्रीम में इलेक्ट्रिकल डिपार्टमेंट
 इकमिटर पाइपिंग फॅब्रिकेशन एवं इलेक्ट्रिकल करते हैं।
 हर रोज हमारे मैत्रियल यहाँ से काम करते हैं
 लिए रिगार बेड्डर फिटर सुपरवाजर आते हैं

मैं 28.11.24 को गांव गया था बच्चे कि भगाई करे
 के लिए और लायस 10 दिनांक को भोगे जाया था जिस
 फॉर्म के लिए गया था इसका जो भी कार्य था उसे
 पूरा कर फॉर्म कर के आते

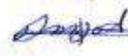
दिनांक 3.12.24 के दिन सुबह

में गेचारा बजे जहाँ के पिता भाई हमारे यादों
 खाके बच्चे बेवस्था कैसे करता है उनके लिए
 आये थे करिब एक बजे हमको हमारे सुभाष
 रोहित ने फोन किया तो हमको बताया कि चार मोर्मी
 हमारे गाँव रहे फिर मैंने सुझा की क्या काम
 कर रहे थे हमने बताया कि हम लोग हैक के
 उपर रेजिगं गेट लोडिंग कर रहे था उस
 समय हैक फट गया जब वता चला
 तो करंट ही मैं अवपिन से साइड इंचार्ज भाई
 भाई को भेजा जो पदुको के बाद सिकोटी
 अकर गयी जै रहा था फिर कोइ साइड ने पहचाना
 हमारे साइड इंचार्ज रावकुमार को फिर भेजा।
 दिया

(P.T.O)



किस फिल में रोशनी में फोटो के बात किया तो
 रोशनी राजकुमारने गिजु इमके के बोद इम जोगी
 से दो बार बात हुआ तो स राजकुमार ने बताया कि
 वार आदमी पवने 11, डोरगाथ, अशोक सुकेम का कर रहे थे
 चारो आदमी अंदर हो गये है कुंत से मैं जा जाइत
 फुलाइत बुक किया बालम से मुजबे क बुक किया
 बुक करते के बाद घर से 5 बजे गिजु क बलने बगाम
 से फुलाइत गा 11 बजे मुजबे पहुंचा फिर से बापम
 रोश 12 बजे घरक के मैं अकरोवा पहुंचा
 सुबह 4 बजे करीब 10:30 बजे डिहो कम के
 बाफोम के साथ कामप्री से पहुंचा आगेके बोद
 मम को 5 बजे बापम गया तब तक मपे
 सुपवाइजर और टिम के साथ बात किया काम के
 बारे में साथ दुपहरता घरी उसके बारे में बात हुआ
 3:12:24 अशोक का अंगरी सहेकार उनके नाम की आगे के
 बोद कर लिए 3:12:24 डोरगाथ के डेर बोडी पर उनके भाइ
 के पास गल भेजा दिया गया और 4:12:24 को पवने रा
 का अंतिम सहेकार 11:12 के बिना किया गया उनक
 भाइ और डिहोवरी के साथ करवा दिया उसके बाद शाम
 4 बजे सुकेम के डेर बोडी को जलाया गम उनक
 परिवार के साथ चारो को कामप्री ने मुवायया
 कामप्री से डिहोवरी थिप (डी रोवम त्रिविमा)
 मुवायया थिया गया 5 लीक से 18 तक थिमा
 के बिना से
 दुपहरता करी है इसके बारे में मुझे पता न
 ही है

अशोक सुकेम




ANNEXURE - 9 F STATEMENT OF WITNESS (INDIRECT)
KIRIT DHOKIYA (OPS PT)

1

①

2. Kirit H. Dhokiy cat
case 36 living at A-104,
Shilpi Dream, metampur, Bheerull
and I am from DNVBhumi -
DWaraka, my mobile 9737640218.

I am working with M/S Detox
India Pvt. Ltd since 22.01.2021 at
G.I.P.C Adkeshwar plant. since
22.01.2021.

I am looking after
operation of U.G + PT plant in
which my responsibility is to
visit waste tanker report given
from Q.C. lab. as per dedicated
tank.

→ We are unloading tanker in
above ground tank which are
16 tanks are defined for such
treatment.

→ Material stored in A.G. tank
Then transfer to neutralization
section reactor where we are
neutralize its PH by using of
H₂SO₄ dosing system. (P.T.O)

(2)

→ After correcting PH of material we transfer it to filter section by filter transfer pump.

→ After filtration this material is stored in P.T. filter tank which are of 150kl capacity each.

→ As process plant ask for feed we are transferring it to solvent plant and again start same process for maintain enough feed.

→ I am also responsible for house keeping of plant & mlc.

→ I am also responsible for material consumables and 20% PR & PO.

→ I am responsible for regular follow-up for all equipment healthy ness, & its periodic maintenance.

→ I am responsible for plant safety and smooth operation & coordination of plant with engine plant.

(P.T.U)

③

→ I have reported in punct at 9:15 on 03/12/2024 and after gate entry I went to my plant and after took off my bags I went for Pt 4 U.A punct Round.

→ after that I came to my office and taken past day updates as some tasks were pending to upload

→ at 10:20 I went for daily morning meeting and it was completed about 11:20 to 11:30.

→ again I went to my office after completing meeting.

→ I again get called by safety department Mr Poudhman for filling form of ZMS audits NE'S.

→ I went to conference room and fill that form given by him.

→ again I reached to my office around 12:25pm

→ when we are finishing of lunch near about 12:35 we listed one sound like blast.
(P. T. U)

stopped and all fire helpers
and operators are called to
assembly point
→ we were at assembly point
on that day up to 11:30 pm
on that day.

→ we were thinking that it was a leak in our furnace type but we realize that it was not so tanks.

→ within minute we find that some dust is flying towards boiler & SD. area and we realize that that sound was from that side

→ when I realize the same I think to go that side for know exact what was that

→ when I was near ETP toilet I hear announcement for my walky that there is a blast and send the ambulance

→ when I reached near mech. workshop I come to know that one body was lying on road.

→ after that area is hazardous and we are requested to go assembly point.

→ At a same time all activity of my plant was

ANNEXURE - 9 G STATEMENT OF WITNESS (INDIRECT)
PRADHUMN PUROHIT (SAFETY OFFICER)

31/1/23 7:10 PM

I Pradhumn Purohit Age 26 years
 Add- D-6/46 Garden City Ankleshwar - 393001.
 Permanent address - 110-B Rajswa Colony Rattam
 Pin code - 457001.
 Mobile no - 9340848175
 9109966071.

I Pradhumn Purohit as a EHS officer
 Working in Detox India Pvt. Ltd. Ankleshwar
 from Jan 2023.

- ① To Prepare all the internal & External audit documents.
- ② To Prepare all the SOP & OCP for the EHS department.
- ③ To Investigate any type of Accidents happen in the Company premises.
- ④ To Ensure work permit System
- ⑤ To Execute the HIRA & JSA for the Concerned department.
- ⑥ To prepare the budget Compliance as required in EHS dept
- ⑦ To prepare the PR & PO for any type of material required in the EHS dept.
- ⑧ To prepare the Compliance document for the ISO audits.
- ⑨ To execute the monthly checklist for all types of critical machine.

- 10) To conduct the mock drill in the six monthly frequency.
- 11) To conduct and prepare the document of safety committee meeting.



On 1st Dec 2024 my weekly off.

On 2nd Dec 2024 I had come in the first shift at approx around 06:30 am then after reaching to the plant I had checked the excavation hole present outside the company as per GPCB concern then around at something after 09:45 am approx gone for the permit checking and sign the permit then after reaching to the admin area I was came to know Mr Jitendra Raval has got hurt while his activa was got slipped near the factory then as first aid was given in the OHC to Raval Sir approx 11:30 am we had refer to the hospital at Ankleshwar. Then I came to my office I was doing the documentation work of internal audit. then at 12:45 Raval Sir came the plant then after that we had sent back to Sir at home. After that around 13:10 pm approx we had taken lunch and after it I had gone to the home. at around 14:20 approx

On 3rd Dec 2024 I had come in general Shift then after it I had checked the excavation hole present outside the Company and then after it approx at 10:30 am I had gone in the meeting and after meeting at near 11:20 am approx. I had come from meeting then I had sit with mikhil in the Conference room we were doing the internal audit document work at than around 12:30 pm approx we had heard the high sound of noise then gone outside of admin area at standing near the Security cabin we had seen high amount of dust than I had gone at sd plant by than I had seen first body near sd tank then I had seen second body near sd shed than somebody has told from backside that 4 workers are involved in these so after searching half n hour we had got 3 body at cooling tower area than we were searching the 4 body than at approx at 2:30 pm near we had got the information that 4 body is outside the plant after the instruction given by DE sir me, Jinish patel, Kirit rana along with ambulance driver we had gone outside of the plant to take 4th body.



Then after the 4th body was searched at incident spot.. I was near the crowd where the public was present at the gate. Then after it the Factory Inspector, District collector arrived in the company premises when the crowd was shouting at that time. then after it at approx till I was at Gate no-01 to admin area only then at approx after 06:30 pm after it as per instruction of DC sir we had evacuate the all employees outside the company by 10-10 employees. then after it by 12:00 am I had gone to home.

PRADHUMN PUROHIT
9340848175

(2)

और बताया कि Dharmendra Sir और Vikas से बात कर ले शायद camera के अक्षर पड़ेगी तुरंत में कपड़े बदलकर मेरी surat office पहुंचा और अपना Laptop open कर के camera wala software open कर दिया और camera check किया कि कौन कौनसे camera चल रहे हैं उसके बाद मैंने ~~मेरी~~ B.P. Bhatt Sir को फोन किया पर उन्होंने फोन नहीं उठाया उसके बाद मैं शाम को 6:30 PM को वापीस घर आ गया। रात को B.P. Bhatt Sir को मैंने दुबारा फोन किया तब मुझे पता चला की चार लोगों की निधन हो हो गया है। उसके बाद अगले दिन मैं सुबह 9 बजे कंपनी में आ गया था। आते ही मुझे Dharmendra Sir ने बुलाया और बताया कि camera कौनसा-कौनसा चालू है वो देखो और उसका डेटा रोक करना पड़ेगा उसके लिए क्या करना है वो देख ले पुलिस आगरी उनको camera का Recording की अक्षर पड़ेगी साथ ही Other Agency भी camera का Data मांग सकती है। 10/12/2024 को बहुत सारे लोगों के पास मुझे ले बाद मुझे यह पता चला की SP Plant के आगने वाली Feed Tank में Blast हुआ है जिसमें 4 लोग मर चुके है मेरी समझ में यही आया है कि बादा के पास और टाकी के उपर कुछ काम चल रहा था सभी करीबन दुपहर के समय कुछ धक्का हुआ होगा जिसमें 4 आदमी मर गये थे।

③

फौर शाफ को मैं घर चला गया और 5/12/24 को मैं लाफायर Company में गया दिनांक 5/12/24 को गोपदर में पुलिस वालों को शारे Camerus 5 नंबर तक दिखाने का काम किया था। अब Feed Tank No. 1 के पास धमाका को Show को ऐसा लिखी Camerus का direction नहीं था Control Room वाला Camerus की direction थिक Road दिखानी है EIP Camerus की direction भी थिक Road Side दिखानी है और SD Plant Inlet Camer बंद था। 3/12/24 के धमाके के बारे में दूर location पर लगा हुआ धिमली वाला Camer SD Entrance वाला Camerus और Main Gate Inlet Camer से दिखाई देता था। इन तीनों Camer को देखने के बाद मेरा, मेरी एरियन से यह लगता है कि incident धमाका के वजह से हुआ है।

अब किया हुआ निवेदन किसी प्रकार के फलान के बिना, बिना केफे मैंने जो मैंने देखा है जो मैंने सुना है और जो मैंने किया है वही मैंने किया है। यह शय है कि ये निवेदन लिखने से किसी प्रकार का किसी और से फलान स्टाग गया नहीं है।

Sachin Suran dasy Gajasthawan



ANNEXURE - 9 I STATEMENT OF WITNESS (INDIRECT)
SANJAY RAJBHAR (LAB CHEMIST)

31/1/25 Page-1

9 I Sanjay Dornath Rajbhar Age- 40 years.
Add. Tirupati complex-2 Near Sai Vastha, Tirupati
Room No- 305, 3rd floor, Kosambdi ANK.
393001.

Permanent Add- Vill- Khalispur, Post- Ardai
dist - Mau Upper Pradesh 221705

Mobile No. 7819930560.

9 Sanjay Dornath Rajbhar working as
Dy. manager. Lab. in Detox India Pvt Ltd. Since
2016.

- ⊗ To checking and verify of analysis
parameters and reporting to my boss.
- ⊗ Develop New Analysis parameters.
- ⊗ Calibration of instrument like
Shimadzu, Analytical, AAS, and
CHNS.
- ⊗ ISO DOCUMENTATION Record maintain
- ⊗ Shift schedule preparation and
movement of main power in month
lab analysis.
- ⊗ checking and verify daily instru-
ment calibration and Record.
- ⊗ Chemical preparation and verification
on of all lab chemical. and report
- ⊗

for routine check-up than come to my office and check mail after analysis report of ~~before~~ B shift and night shift Analysis report. After checking report we all gathered at 9:40 approx for tool box talk after tool box talk again I check analysis report and mail after that we have gone to daily morning meeting and returned approx 12 o'clock again check daily morning waste Water Analysis after some time exactly time not recorded I heard a sound and my office glass vibration. I think that time may be truck tyre was burst But my Hot going out side and say something happen in Plant We all are gathered in Lab passage.



- ⊗ Raw material analysis verification and reporting to Plant and HOD.
- ⊗ Maintenance activity organizing and performing with safety.
- ⊗ COB Analysis report verification and reporting
- ⊗ ILOV Analysis verification and reporting
- ⊗ Daily Attainely morning meeting
- ⊗ Daily Attainely internal lab TBT
- ⊗ Change spare part of the cell instrument.
Perform coast water analysis.
compatibility
flamability
spot test- H₂S, Cyanid.
finger point Analysis
PH, TDS, CO₂, AAD, CU, TSS.

on 3rd December 2024 I came after on duty on 9 AM punch and enter to the lab area I put my bag on table and visit to lab

after that my HOD Mr. W.P. Bhatt
Said please come assembly point.
We all came to assembly point.
After counting we again
came in lab. After 6:30pm
Went to my home.



ANNEXURE - 9 J STATEMENT OF WITNESS (INDIRECT)
VIKAS PRASAD (ASSTT. MANAGER HR)

28/12/2024

मैं विकास प्रसाद उम्र 36 वर्ष रहने का B-15 सिविलियन प्रक
सोसायटी, अंकलेश्वर, मेरा जॉब बिहार मेकाभा का जन्म है।
मोबाइल नं. 9624532340.

मैं डिटाक्स प्राइवेट लिमिटेड में करिव 6.5 साल से
HR Assistant Manager के रूप में मेरी फरज निभा रहा हूँ।
मेरी फरज में सिक्किमोरी, Admin काम, HR का काम, Labour
कॉन्ट्रैक्टर बिल और उसके कंप्लायंस देखरेख है।
दिनांक 3 को मैं सुबह 9:15 के आसपास कंपनी में आया और
अपने HR केबिन में गया रजिटर काम करने के बाद में
सिक्किमोरी केबिन में गया। तब तक सभी लेबर अपने कार्ड दिखा
और नाम लिखवाकर अपने काम पर जा चुके थे। करिव
10 बजे के आसपास से सिक्किमोरी केबिन में अपने सहकर्मी
भाविक के साथ बैठे थे करिव 12:35 के आसपास एक
कंपन सिक्किमोरी केबिन के स्किर पर आया। तब मैंने
देखा कि SD लाइट से धुल उड़ता दिखा तुरंत में अपने
HR केबिन में गया वहाँ से अपनी हेलमेट लिया और दौड़ते-दौड़ते
में SD लाइट के ओर गया। वहाँ Labour ने बताया कि
SD लाइट के दूसरी ओर हुआ है मैं उस ओर गया और
देखा कि एक आदमी SD लाइट के पास में पड़ा हुआ है।
उसके आगे एक पैर दिखा, उसके आगे बड़ा सा
रेंक का डंकन पड़ा था, उसके आगे रोड़ पर एक
आदमी पड़ा था। मैं तुरंत SD के अंदर से वापस बाहर
निकला और भाविक को फोन करने लगा तभी SD रोड़
पर भाविक भी आया, उसे मैंने एम्बुलेंस ड्राइवर को
बुलाने को कहा, उसके बाद हमारे GM Dharmendra Sir
को उसी में 2 आदमी मर गया है बताया और मैं आगे
चला गया। उसके बाद में घटना जगह पर दूसरे आदमियों
को बुलाने लगे तो पता चला कि एक आदमी कुलिंग
टावर के नीचे पानी में है। उसके बाद पुलिस घटना कि
जगह पर आ गई थी। मैं और Chandraprakash Sir और
जी डिपार्टमेंट के MOD सभी इमरजेंसी के समय इकट्ठी

होने वाले जगह पर आकर, साथ में सभी Labs को भी उसी जगह पर बुलाया और ट्रेड पर जो आदमियों कि Qty Entry भी उसके अनुसार गिनी करने करके check किया।

उसके बाद में SDM office वाले officers सभी Registers का गिनी के अनुसार Zerox copy मांगा और मैं Zerox करने में Admin building में उस समय था और Zerox कर रहा था उसके बाद में मैं Admin building के आसपास था। उसके बाद मेरे HOD Rohit Sir का कॉल आया कि मुझे Post Mastern कि जगह पर जवाब होना क्योंकि वहाँ से मूल्क को अपने गाँव ले जाने वाले हैं। तो मैं वहाँ Post Mastern कि जगह पर चला गया और वहाँ हि था। उसके बाद पुलिस वाले ने ^{बताया} एक मूल्क के परिवार वाले मूल्क व्यक्ति को यही राकुकुष्ट ले जाने वाले हैं अंतिम संस्कार के लिए। उसके बाद में जो व्यक्ति को गाँव ले जाने वाले हैं वह व्यक्ति वहाँ से चला गया। उसके बाद 3 मूल्क को जयवंत मोदी हास्पिटल के कोल्ड रूम में पुलिस वाले ने रखवाया और मैं वही पर था। रात में 1 मूल्क के परिवार वाले मूल्क को अपने गाँव ले कर गये। उसके बाद में मैं 2:30 बजे के आसपास कंपनी में आया और वहाँ से अपने घर चला गया।

दिनांक 4 DEC 2024
दूसरे दिन, मैं सुबह 8:00 बजे के आसपास में हास्पिटल जयवंत मोदी पहुँचा और वहाँ दो मूल्क के परिवार वाले से उनको अंतिम संस्कार के लिए ले जाने के बारे में समझा रहा था मना रहा था।

अंतिम मूल्य व्यक्ति के अंतिम संस्कार के बाद में मैं
कंपनि में रात 1:00 बजे के आसपास आया और
अंतिम मूल्य के परिवार वालों के ~~company~~ मुलाकात
के Documentation के बाद में अपने घर चला
गया।

यह निवेदन मैं तब के किसी के दवाव के बिना
मेरे मरजी से लिखा हुआ है।

विकास प्रसाद



ANNEXURE - 9 K STATEMENT OF WITNESS (INDIRECT)

AYASKANTA MISRA (HEAD MECH MAINT)

26th Dec 2024.

I, Mr. Ayaskanta Anshyee Kumar Mishra, Age-48, residing at address - C-2-151, Garden city, Ankleshwar having native address - Floor-3rd, Kalash Residency, R-Ashwmedha collage, Bhambaneswar, Orissa Mob - 8803374066.

I am working with M/s Detox Industries Pvt Ltd, situated at Plot No-4921/22, 23 GIDC Ankleshwar as Manager Mech Maint. since last 2018. My duties and responsibilities are to look after, plant mechanical equipment break down, shutdown planning & execution, meeting attend. To look after the above work one Assistant manager, 02 seniors senior engg or engineers & fitters & helpers are supporting who discharge my duties and to run the plant smoothly. Engineers & one senior engineer are working shift wise in 24 hours. Shift duties are change 02 to 03 days regularly.

On 3rd Dec 2024. I was on leave, my 2nd cadre officer Mr. Kamlesh was also on leave & Mr. Dhruval Senior engineer was on duty. To carry out some railing work on feed tank no-01, which is situated near control room of spray dryer was decided in the meeting of either 29th or 30th November. Normally we do not keep any record of our meetings. As per routine activities all managers are in meeting in morning to discuss daily/routine activities. As far as my knowledge is concern and as per the procedure of our company hot work, height work, LOTO, confined space entry, are maintaining regularly. All the permits are raised by the operational department execution of the work are carried out by our maint department & some of the activities are carried

same contractors, having annual contracts to carry out various maintenance activities in our plant. Panchmurti fabricators is working for welding, cutting, fitting activities. Panchmurti contractors have one supervisor Mr. Rohit & some of fitters, welders & riggers.

To carry out the re-welding & fitting activity on feed tank - 01 is given to M/s Panchmurti contractor on 1st Dec 2024, prior to this 29th/30th it was decided in our regular morning meeting. On 1st Dec 30th evening I called Mr. Rohit supervisor of Panchmurti to carry out re-welding & fitting at top of the feed tank - 01's platform to climb through monkey ladder. Also explained rough design of re-welding to prepare in 03 parts. Again I explain him in details regarding the fittings strictly to be carried out by nuts & bolts. On 1st December the platform is fabricated at his workshop. On 2nd this platform is required to bring near the feed tank no-1. But Rohit across the permit is required to carry out hot work near the feed tank-01, so he ~~approach~~ may have approach operation dept to get ~~for~~ receive the permit. As I was in the meeting permit was signed by engineer. As I am a manager due to some work I visited the site location at about 1pm to 1:30 pm, seen that contractor workers reached with welding machine & accessories to carry out the work entrusted to them. I left the company @ around about 4PM to go to my home. I had ~~was~~ was on leave due to some personal reason with prior permission from ~~my~~ my head.

On 3rd December I was at Bhaurady heard about the incident through my friend, that explosion took place in our company. Then immediately reached to company at about

20'clock. But I was not allowed to enter the plant. So many peopls are crowded near the gate discussing about the incident. Then after half an hour, I went to my home. On that day I was not in position to ask anybody due to massive fear. Next day on 4th december as usual I reached the company at about 9 o'clock and enter in the main building I went to induction room. Many officers are coming and going. Prior to this date while going back to home on 3rd of it was heard that ~~at~~ of contractor workers are died on the spot.

As on 4th I visited accident site location I seen that debris, broken parts of railing, roof cover, spanners, welding rod & single phase cables, sockets, grinding machine part are laying here & there. In between and feed tank & spray dryer area.

As a engineer all the debris and seeing the debris, spanners etc, incident took place may be because of explosion. The above statement I am giving you, on my own will, without fear & without threatening.



ANNEXURE - 9 L STATEMENT OF WITNESS (INDIRECT)L
BHVIN (HR)

Date: 26/12/2024

હું ભાવિકકુમાર કુલશુભાઈ પટેલ, મારી ઉંમર આશરે ૨૭ વર્ષ છે અને હું અસાદરા (અંકનંદાર) ગામનો રહેવાસી છું. હું HR & Admin ડિપાર્ટમેન્ટમાં કામ કરું છું.

દિનાંક ૦૩/૧૨/૨૦૨૪ ના રોજ હું અવારે ૦૭:૦૦ વાગ્યે અધિકારમાં આવી હતી. હું અને વિકાસ પ્રસાદ સર આશરે ૧૨:૩૦ વાગ્યે સિડધારીરી અધિકારમાં પહોંચ્યા હતા.

આશરે ૧૨:૪૦ વાગ્યે દોડકાં અંતલાલા અને તરન જ દોડકાં પ્લાન્ટ તરફ ગયા હતા. મને વિકાસ પ્રસાદ સરએ અનુચિતતાને કારણે ક્રોન ક્લેવર જણાવતા હું ક્રોન ક્લેવર અને કોલેક્ટર ભેગા ક્લેવર અધિકારમાં આવી ગયાં હતાં.

આ પછી હું અધિકારમાં જ રહ્યાં હતો.

ઉપરોક્ત માહિતી હું પુરા ફોલો-અપમાં આપ્યું છે અને મને કોઈ પણ પ્રકારની જવાબદારી ક્લેવરમાં આવી નથી.

Bhavik Patel
(300535)



ANNEXURE - 9 M STATEMENT OF WITNESS (INDIRECT)
DHVANIL SHROFF (MAINT. OFFICER)

नाम: धवनिल पी. श्रोफ.
 उम्र: 35.
 I Detox India. PVT. LTD. इकाई 6 year's एरि
 अरि 33 इ. इ अरि senior mechanical Engg. नरि
 अरि 33 इ.
2nd. Dec. 2024.

5d head tank-1 की ठीक इकाई इकाईकरण अरि
 Erection के अरि Panchmurti lab. team की अरिगत अरि.
 अरि अरि अरि अरि Panchmurti की अरिगत अरि अरि अरि अरि अरि.
 all fabrication work's must be done in bellow &
 only erection work's done on top. Just for the
 the tank inner is in side rubber lining-.

Pipe's bending work's done at fabrication yard
 Near to the Panchmurti work shop ~~beach~~
 lunch अरि अरि office नरि अरि अरि इकाई इकाईकरण अरि
 अरि अरि अरि.

3rd dec' 2024.

अरि अरि 9:00 अरि अरि अरि अरि अरि अरि अरि अरि अरि
 अरि अरि अरि. इ. अरि mechanical work's नरि अरि. अरि
 9:20 अरि TBT. (Tool Box talk) अरि अरि. अरि
 Panchmurti की अरिगत अरि अरि अरि अरि अरि अरि अरि
 अरि अरि अरि अरि अरि अरि अरि अरि अरि अरि अरि
 अरि अरि permit process अरि अरि अरि अरि.

अरि अरि अरि अरि अरि अरि अरि अरि अरि अरि. ~~अरि~~
 Mechanical Workshop अरि अरि अरि अरि अरि
 अरि अरि अरि अरि अरि अरि अरि अरि अरि अरि



હું મીટિંગ માં Admin block, આગેલ ટીમી જણાવી,
આખરે 11:30 વાગે સ્ડ ઓફિસ પાસેલી હું Boiler
area માં ગયેલ અને જરૂી steam line ની
gasket changes કરી આજ સુધી જે પહેલ
હું મારા બીજા કરી જેઈ mechanical work
shop ની ઓફિસ પર પુન ફરત અને 12:45
એ સૌજી અમાર સંભાળના હું બહાર નીકળેલ
અને વીડી રીકી વી emergency પર આના
પાસે information share કરી. જરૂી એ
જલ સ્ડ plant પાસે, સ્ડ feed tank top cover
પાસેના area પર, ઊભી જલ સ્ડ પાસેના રીડ પર,
ગીઈ જલ cooling tower પર વી મળ્યા અને આ
એક Panchnulition માણસી દે જે રીકેલ પાસે
Condition કઈ હું વધુ સોવાની સૌકી વીન આજ સડી. આ
દરમિયાન પીલીવ ગાળા આજ આડી ગઈની અને ~~આજ~~
plant ફ્રમ Mh. Dhakmendra Chhatani site ની
કાચલી હું police station આ વાળાની વાલ
(Advertisement) માં ગયેલ અને આજ વાલ આજ
હું Admin area. માં હતી.

Name: Dhvani shroff
Number: 7984919414.



ANNEXURE - 9 N STATEMENT OF WITNESS (INDIRECT)
DIPU RAJBHAR (DM OPERATOR - NEAR THE ACCIDENT SPOT)

①

Date - 06/01/2025

⇒ मैं दिपु राजभार उम्र 25 साल रुम नं 175
स्वीड डिम पाली WADC के विद् अकलेडर
गाव - इलवाँ पोस्ट - कणरिमा भागा राणपुर
वस्स (विडार) मो नं 9128188064

⇒ मैं Detox india Pvt. Ltd. WADC में
R.O/Dm opptcar के रूप में 23 महिना
से काम कर रहा हू। मैं R.O/Dm
पलाता हू 03/12/2024 को मैं 2st
पाली में सुबह 6 बजे टिली पर आया
था मैं अपने रिलीभर के साथ एम
के काम के बारे में क्या किचा रा
और रिलीभर से चाणी समझ कर काम
पानु किगा था मैंने उस दिन साग
नही खाया था कही 12 बजे के आस
पास मेरा HOD अरुन कुमार मीसल सर
का फोन आया कि म रुम आ आकाव
मेरे आफिस में मैं तुरत में इलरे
खानी को बताया कि कसे SD पलात
के वीड से अरुन कुमार मीसल सर
के आफिस में जमा काहा जाकर कर
अरुन कुमार से DM/R.O पलात के
बारे में बात की करीब 12:35
मितिण कबलस होने के बाद मैं मेरे
R.O/Dm पलात की ओर पैडल चल कर



(2)

⇒ एक

⇒ SD पंजाब के कंट्रोल रूम वाला रोड़ से जा रहा था कंट्रोल के नजदीक पहुँच समय कंट्रोल के पास में एक बहुत बड़ा आवाज सुना में धक्का गशा और धुँधने और मुड़ के वापस इसबली पड़त आ की और रोड़ के मा तब इसबली पड़त बहुत सारे लोग भाग का इधर-उधर से आ रहे थे में बहुत धक्काया हुआ था नेता दिशा का काम नहीं कर रहा था थोड़ी दूर के थोड़ी धक्काएत हुआ होने के बाद में अपनी जहा से आवाज आई थी कहा गया और देखा तो पुलिस भी आ गई थी SD पंजाब के सामने एक बड़ा इकन और बहुत बड़ा लोखन का सामान इधर-उधर पाहा था और एक आदमी का शरीर इकन के पास पाहा था दूसरा SD पंजाब पंजाब वाला रोड़ के पास था तीसरा पाहा था दो रोड़ मिलते हैं वही पाहा था दुसरे में के पुलिस वाले ने हात पाने का वाला और

(3)

से कंपनी के मनेजर ने इसकी पेश
 पर जाने को बोला कउतिन के लिये
 यह हमका SD के भी feed में हुआ
 है। और कौतेख के चार आदमी
 गए गया है हसा लुना है। इसी
 वीच बहुत कम वारें बगव के लोग
 आ गये थे तब हम कुछ हागम
 न हो जाये इस वीच हम Minin के
 पिछे चले गये फिर शाम को 7 बजे
 आपने आपने घा जाने के बोला फिर
 हम वा चले गये थे। दुसरे दिन
 9 बजे आया था फिर अन्दा जाने के
 लिये माना कर दिया था फिर मैं
 घा चला गया था। MOD पर बोले
 की बगव चल जावं और बगव है
 04/01/2025 को फिर वापिस आया हुआ
 यह निवेदन मैं आपने हागो लें किसी
 के बगव के बिना और बिना कफिज
 के जो मैंने लुना है और देखा है कवही
 लिख है।

दिपु रावभा
 मो० 9128188064

**ANNEXURE - 9 O STATEMENT OF WITNESS (INDIRECT)**
NIKHIL MOKHARIYA (SAFETY OFFICER - WHO SIGNED THE PERMIT)

26/12/2024
Nikhil Mokhariya.

I am Nikhil Mokhariya working as an Officer - EHS from 08/07/2024 to till date. (Approx 5 month.). And my qualification is B.E. Mechanical + PDIS + PDIETM. My total experience are 2 yrs and 8 month. Experience details are following.

1. MPL-5, Jagadia (1 year) (Contract safety Supervisor)
2. Cobance Lifescience (1 year, 3 month) (EHS-officer)
3. Detox India. Pvt. Ltd. (4 month) (EHS-officer)

On the date 02/12/2024. I have reported in general shift and after that Mr. Pradhyan was informed me that Raval sir bike got slipped and he received injury. So after that I went to hospital in company ambulance with Raval sir and ambulance driver Mr. Dinesh Joshi. I came back to company at around 14:00. After that I took lunch then after I working on excavation checking activity from approx 15:00 to 17:00 and after that I doing document updation activity and Belt conveyer counting and checking activity and after that duty was updated in excel sheet. This activity was done on 17:00 to 18:30 approx.



on the date 03/12/2024, + ...
reported in A-site from 06:00 Am.
At around 06:15 i taken hand over to
receiver and after that i checked
e-mails. After that Around 06:40 Am
I started doing documentation checking
and updation activity. and after
that from 07:30 to 08:00 I doing my
routine excavation checking activity
and after that I going to EHS office
at around 08:30 to 09:00. And after
that at around 09:00 I came back
to EHS office to Admin office during
that Mr. dhruvil and Mr. Vishal meet
me near mechanical workshop and discuss
about the work.

At Around 09:00 as per the management
Instruction I started excavation checking
from 09:15 to 11:15 Approx. During that
Activity at around 10:15 contacted on
walki-talki to EHS department and
says that the permis was ready and
your side sign is pending. so, Mr. Prudhvi
got replied that permit is send near
security cubine. so, after that at
around 10:30 permit are come. so, fir
I read the work description then after
checked all sign are done or pending

then after i sign the permit and write comment that " Ensure that the tank should be empty " and after permit was send back to plant. (Hot work permit - 1097)

After that completion of excavation activity at around 11:30 me and Pradhyan work on internal Ims and die NC Repare updetection and completion activity. So, After that at around 12:40 I heard some noise. so I immediately wear my PPE's and go fast to plant side. I followed some people that are moving towards the SD Plant side. so, I go to SD Plant and watch root laying near plant and watch that one person laying near root and one person laying on the main road near SD Plant control room office. so After that I immediate call to ambulance driver. After some time of incidence some persons are says there in there activity 4 people are working. so, after some time our company employee find another body. After that I came to one for searching blanket to cover all body. During that police is also visited the incidence location

so, I provide PPE's to them and
after that I help on head count
activity and other rescue activity.

Nikhil Mokhija.

ANNEXURE - 9 P STATEMENT OF WITNESS (INDIRECT) NISHANT (ELECTRICAL OFFICER)

Detox India Pvt. Ltd.
Nishant Dipak Kumar Modi - 35 Years.
Working as Deputy manager Electrical in DIPL
from 2016 (8 Years). in General Shift (4 to 6)
MO: 7878570769.

Responsibility:-

- Looking after all Electrical maintenance and Project Related work.
- Looking after all PM and Breakdown activity of motors, transformers, MCC Panels and PCC Panels.
- We follow PM schedule but some time cannot do PM due to non availability of equipment.
- In maintenance, if lock out required for equipment LOTO Procedure will be followed.
- For Electrical Portable equipment i.e. welding m/c, grinding m/c, chukso m/c, Extension board etc. will be checked and verified by electrical department of every vendor who will come to work in DIPL Premises. Each electrical operated equip. will be verified every three months.
- 1st december -2024 - weekly off.
- 2nd december -2024
checked mailed, complete MIS data.
complete the APA form of Mohit Lakshmi & furnish fee
- discussed with vendor for material delivery & follow
→ coordination purchase team for making of PO for new materials.
→ attend production meeting.

P.T.O.



- 3rd dec-2024, come at site (9:00 am).
- checked daily mail, complete MIS data. (9:00 to 12:00).
- General discussion with team for daily jobs.
- follow up with procurement person for code generation of material.
- fill up pre-assessment of PSM training & give mail to Jitendra genral sir.
- take initiative for wasabi best initiative (participate), complete 4 initiative in google sheet. and sent to Ashutosh sir for proceed further.
- Around 12:40 hrs, I heard the sound of blast I was in PCC Room at that time. after the blast, I rushed near SD plant area. observed very much dusting around that area. after some time meet with bhaskar datir sir, who told that something happened in SD-feed tank. observed one body near SD control room & one body near SD plant area. As order from Bhaskar datir sir, I ordered my electrician to disconnect the power of SD-1 & 2 plant from PCC Panel. after ~~some~~ that observing from some distance of accident area. after some time get msg from CP sir, that all person have to rush at assembly point. so I rushed to assembly point near main gate at around 13:40 hrs. Anon mishra sir had given emergency msg on walkie



(2)

- All team gathered at assembly point and HR Personal and security personal were doing head count.
- Around 40 to 45 min, we stood at assembly point, while police team had come at site.
- After that I sit in admin area till 6 PM and after 6 PM, I leave from site. we m/s punch multi fabrication. having following electrical equipment at incident spot (SD-feed tank 75KL)
- welding m/c (1-phase)
- hexa m/c
- Extension board (electrical).
- 4" gas cutting m/c missing after incident.



ANNEXURE - 9 Q STATEMENT OF WITNESS (INDIRECT)
VICKY KUMAR (SD PLANT OPERATOR)

20/12/24 (1)

હું વિજ્ઞાનકુમાર વખતેનાર ચીલકી, ઉમર - 31, મોબાઇલ નંબર-9067577374

ઇલેક્ટ્રીકલ વખતેનાર :- 1031/1032, શ્રી ઇન્ડિયા સેલ્ફી, ઓપી વાળા રોડ, અંદાડા
અંબોલ, ભાવલ

વખત :- કાજુપા, ભાલુકો-બુલ્લો - નંદુરતક

હું G.I.D.C અંબોલ માં આપેલ ડિસ્ક્રિપ્શન પ્રાંતે 2 મામની કંપની માં
હું દોલ્લા 02 મહેના પી (02/04/2024) શીફ્ટ એજીટીવ
ભાંડે S.O plant માં સિદ્ધ છું.

હું ખાંડ માં plant operating અને ખાંડ આપેરે
અને ખાંડ માં આપના લોક તુ કામ દેવલ છું.
મારી શીફ્ટ સુધી આપની દેવ છે. આ બધુ હું
કંપની માં S.O plant (વત્રે કાજ) મામના ખાંડ માં
હું મારી જાલકારી નિભાવુ છું. જે હું પ્રોફેશન ખાંડ
માં કાસા મિસ્ત્રમ પી આપેરે વાલ છે. અને ખાંડ માં
મારી દર નિભાવુ છું. આ ખાંડ માં અપરે વ્યા
P.T ખાંડ માં પી મહેરીયાત મગાવામાં આવે છે. આ
મહેરીયાત મિસ્ત્રીર દોલ્લા માં દેવ છે આમહેરીયાત
માં અમગા અમગા કંપની માં આપલુ લેવ મહેરીયાત
મિસ્ત્રીર દેવ છે. આ મહેરીયાત પેલા P.T ખાંડ માં
વેલે વાલુ દેવ છે. વ્યા. P.T ખાંડ માં પેલા કિસ્કર
મીસ કાકા કિસ્કર વાલે અપેરે પકરીલમ કાકી ને પ્રિ.રેક
માં વેલે વાલુ દેવ છે. અને પછી અને ખાંડ માં રેક
લેવ આપુ પમા અને P.T ખાંડ માં કોલેક્ટર કરીને
મહેરીયાત શીફ્ટર આપુ આપુ કરીયે છે પછે ભાષી
વ્યાલુ વાલે આપના ખાંડ ની 75 KL tank માં મહેરીયાત
આપે છે અને પછી એ રેક માં પી વાલુ કાકા S.O plant
માં મહેરીયાત 5 KL tank માં વાલુ છે અને એ રેક માં પી
કિસ વાલુ કાકા એ મહેરીયાત ખાંડ માં શીફ્ટર વાલે કિસ
વાલુ છે.

હું 02/01/2024 વાગે આપના વાળી માં (06:30)
આપના અને પછી 02 ઉપર પી ખાંડ માં વાલુ



અને કંપની માં અદર પંચાનન ના કંટ્રોલ રૂમ માં ગયો ત્યાં
 નાઇટ પાલી માં વિશાલ ભંડેરી કરી ને એમ્બુલીયર નાઇટ પાલી માં
 દોઝે એના પાસે પી ચાર્જ લીધો એમને ચાર્જ માં આપ્યું છે ખાન
 નોકમલ કંટ્રોલ રૂમ માં ચાલે છે અને દરમિયાનમાં ૭ કામ કરવાનું છે
 સંકેત કરી ને વિશાલ ઘરે જવા લાગ્યા થઈ ગયો. અને કુ માલ
 રોજ ૭ કામ કરવા લાગ્યો. જેલ ખાન ના રિડીંગ મેટા
 વંદામાં અને પછી ખાન નોકમલ મેઇ ને પાન ના
 રિડીંગ બુક માં લખ્યા અને પછી આગળ દિવસ જેમ છે
 તારીખ - 01/12/2024 ના પાન ના ડેટા અદા અમારે
 M.I.S તરીકે એક ડેટા શીટ છે એમાં નાખ્યા અને
 પછી થોડી વાક રથ ને પાન ના સોપરેટર સામે ખાન
 માં રાઉન્ડ માલ્યા ગયા ત્યાં વધુ ખાન માં નોકમલ દુધ પછી
 સાવરે ૦૬:૦૫ વાગ્યે જેલ દિવસ પાલી ના સોપરેટર અને
 એમ આગળ એમની જેમ છે ફેક્ટ ક્લાઇવર અને ફોરભીશ
 ક્લાઇવર ની એન્ટ્રી કરી. અને પછી સોપરેટર ને પાન માં
 દરમિયાનમાં અને પાન માં સેવાનું કાર્ય પછી કુલે ૦૬:૦૦
 વાગ્યા ના રિડીંગ બુક માં રિડીંગ લખ્યા. અને પછી ૦૭:૦૦
 વાગ્યે અમારા ખાન ના મેનેજર નામ - ભાસ્કર દાત્રી છે
 એ સ્ક આગળ પછી થોડી વાક રથ ને એમને મેં ખાન ની
 ડિટેલ ક્ષેત્ર જેમ છે ખાન નોકમલ ચાલે છે અને દરમિયાનમાં ૭
 કામ ચાલે છે. પછી થોડી વાક રથ ને ટાઇમ 10:૦૦ વાગ્યે
 જેલ સ્ક એમની રોજ મીટીંગ થાતી હોય છે આગળ એકમીન
 એક્સિડન્ટ કોન્સલ્ટન્ટ રૂમ માં મેજો ત્યાં ગયા અને પછી
 મે ટાઇમ 10:૦૦ વાગ્યે ના પાન રિડીંગ બુક માં રિડીંગ
 લખ્યા અને આશરે 10:૩૫ જેલ વાગ્યે કોન્સલ્ટન્ટ સી પંચામી
 ના સુપર લ વાઇઝર રીફિલ મારી પાસે કંટ્રોલ રૂમ માં આગળ
 અને મને કિલુ છે ૭૬ Kc તમાલ માં ઉપરની સાઈડ અને
 રેલીંગ લાગવાની છે અને સોવર હોલો લાઈન માં સપાઈ
 લગાવાના છે તો હોટ વર્ક અને હાઈટ વર્ક પસીટ લાગવાની
 છે મે એમને કિલુ છે હોટ વર્ક થયા કરવાનું છે તો એમને
 કિલુ છે હોટ વર્ક નીચે જ કરવાનું છે અને ઉપર રેલીંગ
 ખાલી દિલીંગ કરવાની છે. પછી મે પસીટ લગાવી અને



અને ખાંચ માં બધું નોકનમ હતું ત્યાં 12:30 જેવા કોચ્છર
પ્રેમકુતી ના લેબર અને સુપરવાઈઝર સોફિયા બાથા પછે તે
હાઈડ્રા મશીન ડ્રાકા દેવકુલક ભગવાનની રેલિંગ બે માઠા
માં ભાવી રેન્ક ની સામે નીચે કાઈડ મુઠ્ઠી દર્દી અને
પછી ટાઈમ 01:00 વાગ્યે તે ભેદ બધું અને પછી ખાંચ
ના સીડીંગ ભાગી 02:00 વાગ્યા ના ખાંચના સ્થાનમાં ખાંચ
ના સીડીંગ મેચા અનેના માં 02:00 વાગ્યે વિરાલ બપોર
પાણી માં આપ્યા અને એમને ખાંચ મો અને વડે પક્ષી
વિરો ની માહિતી આપી મે બધો ચાર્જ આપી હું ઘર
જવા રવાના થયો.

હું દેલના DC મશીન થી કામ છુ છું પણ મને
C મશીન દરીમીયાના કોઈ પણ માત્રની વડે પક્ષીની
ફેનીંગ આપવામાં આવી નથી.



पंजी - 2

एके उपर दिनाकां प्रोसेस प्रेशीरर अर्गे रिड
 टिड गो इंडेल लैवल असेन माडिली बाबु छुं.
 तारीख . 31/12/2024 ना रोजे अपाई ए वाज
 ह माही इरर डिपर व्यापिल इला अर्गे रात्री
 पाणीना इरर जगोपता प्रसिध परल अनेगुनीपर
 पशोनी गे आ दिनाकां अर्गे सोलाकिल आी.
 ह आ जर्गे डिड रूड नी जागुगा व्यापिल आडिस
 अर्गे इंडेल इग गो जैसीन मारी शकरी
 सोलाकिल छुं. मुगे अर्गे सोलाकिल पंका प्रसिध परल
 ए मोमिड शीन गजाविल इ अर्गे रात्र रात्र
 नर्मिल शीन आली इंडेल ए अर्गे डिड रूड गु लैवल
 टाण्डर अवागुं जय छुं. एपर जाड प्रसिध परल
 एपी पीलागी सिडर पुरी इरी इरर आ अवाग
 परल गे एपर जाड प्रोसेस मीर ना रक्षरर नी
 अर्गे रक्षरर प्रेर इरर परे वगे इरर अर
 अररर गोरी नगे लगेला रला. आरगे 9:30
 पागे डिड रूड गु लैवल अर्गे गजाता गे गेडी-
 रीडी दारा मि-इररर रात्र ना इरर जगोपता
 रिग्युलार्ड आर्य वाग इरी इररर अरवा
 गजाविल आगलगा रिपरा अर्गे इ तारीख
 02/12/2024 ना रोजे दिडी दारा एर परगीर
 आपी डिड रूड नी रात्री गंजर-2 पास आ टाडीनी
 उपर इलांग जगावानी अरारी अरवाणी गेप
 नीसुं पसिडोंग अरवा अर्गे अरिग आगरी
 मुकुला रला. तारीख 03/12/2024 ना रोजे
 अररा मुगल आरगे 9:20 उलाडे इररर
 आ पशोनी ना इमदीरा राडिग मुपरवाधर
 तवा मुकुला, अरकि, रिकाप, प्रोसेस डिड रूड
 पास आवला रिपरा नी अरुरी इररा शकरी
 अरवा आवला रला. आ इमारी शउ अरवा
 राडिग मारी पास एर परगीर जगावता
 व्यापिल रला.



Page No, 3

પ્રેમિયસ ડિપાર્ટમેન્ટ પરથી ઈલેક્ટ્રિકલ કામ કરતુ હોય છે તે આગલા દિવસે કામ કરતે હોય તેજ ન હોય તેની ડાખીરી માટે મેં પરમાર નંબર HOPW: 1097 ઈલેક્ટ્રિકલ કામ કરી મેં રીપેર ને વૈદીકા મશીન બરાબર છે, તપાસીને બરાબર છે, કાપર એકેકુલેશન બરાબર છે. ભારે રીપેર જવાબ માં વૈદીકા મશીન, જે ગ્રાઇન્ડર, જરૂર સ્પેર, કુટર મશીન તથા એકેકુલેશન ટોચાનું જલાવીલું હું મારા કંડેલે કે મેંથી બહાર બનાવી તપાસ આ તમામ કરી ભારે તમામ પરતુઓ ડિસ ઈસ્ટ્રુ નો બાબતમાં મેં જાણ કરી. આ પરમાર માં મેં મારી જગ્યા ઉપરથી ઉભા થઈ મારા ઉપરી સ્વધાક્ષી ભારેકર સર ની સહિ કરાવે આ સમયે ભારેકર સર મેં કુપા પ્રકારની ડાખીરી છે અને કુપા સાર્વજનિક છે તે બાબતમાં મેં પૂછપરછ કરીને અને મેં આ બાબતે ઉપર તપાસીને તમામ પરતુઓની વિગત ભારે કાળ કરી આપેલ અને ભારેકર સરને આ પરમાર માં સારી કરીને આપેલ છે. આ પરમાર મેં રીપેર ને આપી અને જલાવીલું હું આ પરમાર માં મિડીનીડલ ડિપાર્ટમેન્ટ માં જઈ દુબીલ ભાઈ ની સારી કરાવી તે રીપેર પોડી વાસ્તમાં દુબીલ ની સારી કરાવી આ પરમાર ભઈ મારી પાસે પરત આપ્યા ભારે વાદ મેં સેક્રેટરી ડિપાર્ટમેન્ટ સુધી સંબંધિત સાર્વ વાત જરૂરી સલામતી ના ચલાવે બાબતે સલામત સુચન આપી આ પરમાર માં સારી કરવા બાબતે કરી અને આ પરમાર માં કાબળ મેં મારા ફેલ્પર હું મેં જાણ મેં પાદ નથી તેના દરમિયાન સંબંધિત માં પ્રક્રમણ પાસે સહિ કરાવવા માટે લેલે હતા.



વસ્તુ
 મુદ્દમન કે અન્ય કોઈ સ્ટ્રીટી ડિપાર્ટમેન્ટ ના
 કોઈ વ્યક્તિ અથવા ઉપર આવ્યા કે નહિ
 તેની મને જાણ કરી નથી મેં તેની તપાસ
 પણ કરી ન હતી આ અગત્ય ગાળા દરમિયાન
 સ્ટ્રીટી મારા કંટ્રોલ રેમ મોંથી બહાર વર્પાઈ
 હતી. પરમાર સાથે મુદ્દમ આવ્યા બાદ
 આ પરમાર મેં મારા ફોન બંધ કરી
 મુકી મારા કુટુંબ કામમાં વ્યસ્ત વર્પાઈ હતી.
 પાંચ વાસ્તો આશરે સ્ટ્રીટી પર મારા
 કંટ્રોલ રેમનો આવીસ અને પરમાર બાબત
 મુદ્દમ પર ઉશ્મણ મેં જાણીને કે બધાની
 પુસ્તીજાન મળી ગઈ છે આ સામગ્રી સ્ટ્રીટી
 કંટ્રોલ રેમની બહાર ગઈને કે કરી મારા
 કુટુંબ કામમાં વ્યસ્ત હતી. આશરે
 12:35 ની આસપાસ ઘડાકો વર્ષા તેવો
 ભરેલો અવાજ આવ્યો અને બાજીંગા
 કાચ ફુટા હોય કર્યો અવાજ સેલાબાલે
 આ અવાજ સાંભળી તરત જ મેં
 સ્થાન સ્ટીરની ની ટુમરુજીની પુરા બાજની
 સ્થાન બંધ કરી પછી મેં લગભગ ત્રણ
 ના મેમ્બુલ આલતા પપ બંધ કર્યા અને
 અચાનક પાપર બંધ વર્ષાને ડોવાની આવીને
 તરત જ મેં કંટ્રોલ રેમની બહાર નીકળી મેં
 સ્પેસ ડ્રાપર પાસે કુટુંબ પાસે હોય અને
 જાણ મળેલ તમારકર સર વધા જીવોત મારી
 ને નીકળે કુટુંબ જતા જોય આ હું પણ
 પાંચ વાર કંટ્રોલ રેમ પાસે ઉભા રહીને પાસે
 તરફ ધીમે ધીમે આગળ જતાં હતો તે અગત્ય
 મને સ્ટીર પણ એકે માળસા ગેભાઈ રીલે
 પેટી ધાપલ પાસે નેવા મળેલ આગળ જતા
 કિડ ટેલ ની કોટેલા ઉભરુ પડેલુ નેવા મળેલ
 અને જાણ મળેલ એકે માળસા ગેભાઈ રી
 ધાપલ પાસે નેવા મળેલ ત્યાર બાદ મેં
 સ્ટ્રીટીને મુદ્દમ પર કરી કે અડિયા બાજીંગા
 માલસાં કર્યા છે.



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બાળ દિવસે ઢિરી ડું જગરલ ચિઠ્ઠામાં
 એ તપ વાગે આપણે અન્ય મારા સાપાદરો
 સાથે સર્કા મુખ્ય આર બહિલમાં મરણ
 વાળે સવાની જાગવા મળેલે અર્જ તમને
 આપણે કેપતમેસની (વજાર) ની વાલ ખપેલે
 બગાવ કુટી સીલે બચ્યાં તે બાલકની ની
 કોઈ સર્કાઓ મરી સાથે ખપેલે ન હતી.

કિચાકે તિપદેલ ડું સમજુતી વા કિચિપલ
 જમના દલાલ વિભા તે સમજુ વિચારી
 મળી આપુ છું જે કિચકલ બની છે તેને
 વાળે તે કિચાકે તિપદેલ ના કુટલ છે.

ANNEXURE - 9 S STATEMENT OF WITNESS (INDIRECT)
ROHIT KUMAR (SUPERVISOR OF M/s. PANCHMURTI FABRICATORS)

नाम :- रोहित कुमार वर्मा
 उम्र :- 28 साल
 पता :- पंचमूर्ति विहार का निवासी है।
 मैं मार्च - 2024 से Panchmurti Fabricator
 में Supervisor के रूप में काम करता हूँ।
 और मुझे Detox India Pvt Ltd में
 Fabrication का काम करता हूँ।
 45 KL tank नीचे plate form का
 काम किसे 30/11/24 को
 फिर उसे Top railing का काम बनाया
 गया तो railing का Material 24/24
 को Workshop में cut करके pipe
 के लिए दिया फिर हम अगले दिन
 सुबह से ही वहाँ हम अपने आपकी
 के साथ Entry किता Main Gate से
 Security वाले को check किता उसने वह
 Note Book में सबका नाम लिखा और
 खतरा होने अपने Workshop में चलते
 वह Main Workshop जाने सभी आपकी
 के साथ वहाँ TBT हुआ फिर
 आपकी Workshop में जाने हम वही सब
 धर्म सिंह मुझे काम बनाते और
 सामान लाने के लिए वहाँ permit बनाते
 सामान check किता सब साही करा के
 वहाँ permit हो गया है आपकी काम
 करते कि वहाँ आपकी लोड करते
 से काम कर रहे थे उस दिन हमें
 लगा कि हम वहाँ कि वहाँ कि
 कर जो रहा है Main Workshop में

पानी सि लिना जा आने बाजे में
 बाहर से जब तक यमका पूना में
 और कर बहुत लोहा निकलने में हम
 ली साथ से है बाहर निकलने में
 सब यमान विवरण हुआ और आदमी
 को लमके पर भिगा हुआ देखा और
 Assembly point के पास जाते हैं वहाँ
 था तो को इतने मुझे साबरा है जो
 उन्हा ली राजा उधर है मुझे देखा
 राजा मेरा विमर्श काम नहीं कर रहा
 था कुछ साबरा से नहीं का रहा था
 कभी ही राजा से सब मेरे आदमी
 का नाम पता माँगा रहे मैं प्योर
 तो हम चला

राजेश कुमार लाल

26/12/24



ANNEXURE - 9 T STATEMENT OF WITNESS (INDIRECT)
ASFAK KATLARIWALA (HEAD - ELECTRICAL)

I m. Ashfaq N. Katlariwala, Age: -53, Residing at A-3- Alif park, opp G.M. park, Near Happy Nagar-2, Pioneer Road, Anandnagar, -393001, Dist. Bhavnagar, Gujarat. mb. No. - 9824445752.

I have joined DIPL in Nov, 23rd, 2015, as a manager Elect. & Inst., now working as a Sr. mgr. Elect & Inst. looking after all routine maint. work of Elect. & Inst. as well as looking after all new project work of both dept. Further more we are tested all elect. equipments of all contractor's working in our premises & try the safety tag of all equipments in good & working condition including next date of examination. Sample of tagging attached herewith.

Veolia (DPL) having three mechanical contractor's. Namely (1) Sahar enterprise (2) Panchmurti enterprise and (3) Jay ambe Fabricator's. All three are doing general Fabrication work, lifting, shifting & replacement of different equipments of plant.

For above kind of work ~~the~~ whether it is a annual or job based are given by mech. maint. dept.

my departmental team has verified. Electrically operated equipments of Panch murti ent. as per attached sheets. Last test was carried out on 10/11/2024 for big welding m/c. This welding m/c is lying at his w/s.

The accident occurred on 3rd, Dec, 2024 at about 12:45 P.M. at S.D. Feed tank area where 4 No's. of contractor workers died. As per my knowledge this incidence is

happened may be due to fire & Explosion. After the incidence following equipment's of M/s Parach Murti are lying on the spot, that is small portable welding m/c (S.S. no. PM-06), ~~power~~ checksaw m/c (S.S. no. PM-02), Hand Grinder 9" (S.S. no. - PM-03) and broken extension cable with broken socket and one backside part of Hand Grinder 4" (S.S. no. - PM-01) which was last tested on. 12/11/2024. The photographs are attached hereafter. Now mechanical maintenance, Q.S., safety is not my responsibility but as an experienced electrical person, I may guess the incident may be happened due to fire & explosion.

The above statement is given by my wholefulness without any pressure, or threat by any person.

witness:-

(A.N. Katheriwala)

Dt: 14/12/2024



PHOTOGRAPHS



FEED TANK 1 OF SPRAY DRYER PLANT



THE TANK AND THE ROOF



ROOF TOP FELL ON OPEN GROUND



PIECE OF PIPE WAS CONNECTED ON TOP OF THE ROOF DETACHED AND FELL NEAR GROUND





TANK NOZZLE AND OPEN VENT WITH LOOSE PLATE (ON ONE BOLT)



MATERIAL BEING SHIFTED



CABLE AND MARK OF CUTTING ON GROUND



PIECE OF ELECTRICAL CABLE WHICH WAS CONNECTED WITH POWER SOURCE AND SOCKET



PIECE OF ELECTRICAL CABLE WHICH WAS CONNECTED WITH POWER SOURCE AND SOCKET AND
PIECE OF HAND RAILING TIED FROM TOP OF THE TANK WITH ROPE



WELDING HOLDER ON GROUND NEAR STAIR CASE



ELECTRICAL POWER SOCKET ON THE PLATFORM OF THE TANK (DYKE)



WELDING RETURN AND CABLES ON GROUND NEAR TANK STAIRCASE



ELECTRICAL TOOL WITH ELECTRICAL INSPECTION STICKER



WELDING MACHINE WITH ELECTRICAL INSPECTION STICKER



ELECTRICAL SOCKET



ELECTRICAL GRINDING MACHINE BIG ON GROUND NEAR STAIRCASE



PIECE OF HAND RAILING FALLEN ON ROAD NEAR THE TANK



BROKEN PIECE OF GRINDING MACHINE (SMALL) FOUND NEAR ROAD



STAIRCASE, WELDING MACHINE AND CABLES



FEED TANK 1 OF SPRAY DRYER PLANT



PIECE OF HAND RAILING WITH CLEAT WHICH ON THE TOP OF THE TANK



WELDING MACHINE IN CONTRACTOR SHED



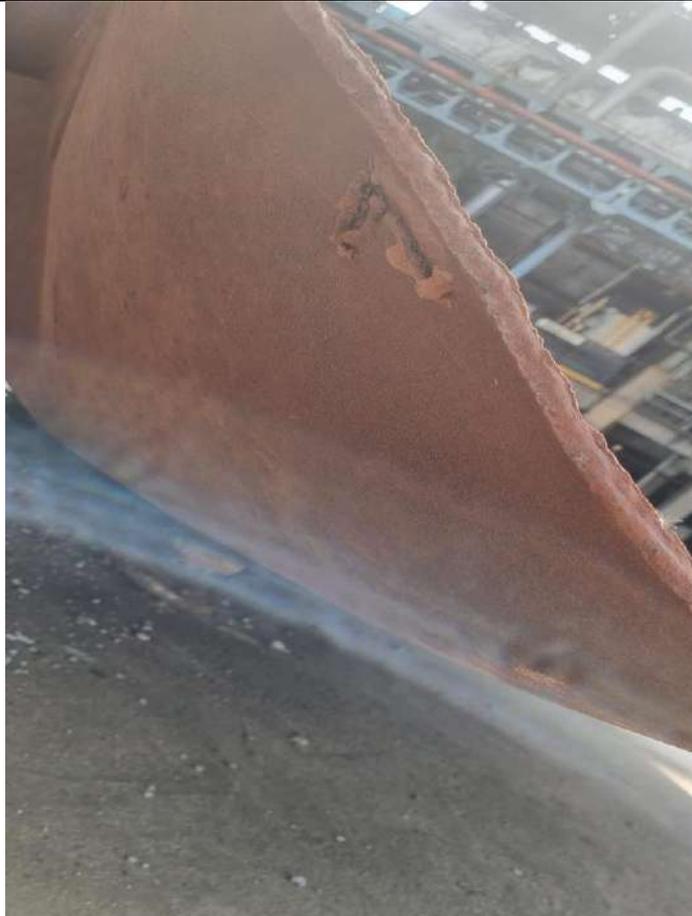
BROKEN LEVEL INDICATOR WHICH WAS ON THE TANK ROOF



THE DRILLED HOLE DIA MAY BE INCREASED BY CUTTING WITH ARC



CLEAT ON THE TANK



CLEAT WELD SPOT



CLEAT WITH BOLTED HAND RAILING





18 Guidelines for Environmental Compensation:

Hon'ble National Green Tribunal (NGT) has issued the direction in several cases to impose the penalty on the non-complying polluting units to GPCB and also directed Central Pollution Control Board (CPCB) to take penal action for failure and recover the compensation for damage to the environment.

Following the directions, CPCB, New Delhi has issued "Report of the Methodology for Assessing Environmental Compensation and Action Plan to Utilize the Fund" (CPCB Methodology).

Further for the Bio-Medical Waste Management Rules, 2016, the CPCB has published Guidelines for "Imposition of Environmental Compensation Charges against Healthcare Facilities and Common Biomedical Waste Treatment Facilities".

Gujarat Pollution Control Board's Environmental Compensation Guidelines to be followed in the Gujarat State are as under:

18.1 Cases to be considered for levying Environmental Compensation (EC):

- a) Discharges in violation of consent conditions, mainly prescribed standards/ consent limits.
- b) Not complying with the directions issued, such as direction for closure due to non-installation of OCEMS, non-adherence to the action plans submitted etc.
- c) Intentional avoidance of data submission or data manipulation by tampering the Online Continuous Emission / Effluent Monitoring systems.
- d) Accidental discharges lasting for short durations resulting into damage to the environment.
- e) Intentional discharges to the environment -- land, water and air resulting into acute injury or damage to the environment. (Here, it also includes discharge of spent acid, hazardous wastes or untreated effluent through tanker or other media into water body, dumping of hazardous wastes etc.)
- f) Injection of treated/partially treated/ untreated effluents to ground water. (here, it also includes illegal discharge of effluent or hazardous wastes into underground water strata i.e. through wells, bore-well, reverse boring etc) excluding permitted activity.

18.2 Assessment for levying Environmental Compensation:

- a) For the cases- (i) Discharges in violation of consent conditions, mainly prescribed standards/ consent limits, (ii) Not complying with the directions issued, such as direction for closure due to non- installation of OCEMS, non-adherence to the action plans submitted etc., (iii) Intentional avoidance of data submission or data manipulation by



tampering the Online Continuous Emission / Effluent Monitoring systems.

assessment of Environmental Compensation shall be calculated as per formula as mentioned in Para number 1.3 of CPCB Methodology, which is as under:

$$EC = PI \times N \times R \times S \times LF$$

Where,

- EC is Environmental Compensation in Rs.
 - PI = Pollution Index of industrial sector (For Red Category- 80, for Orange Category- 50 and for Green Category- 30)
 - N = Number of days of violation took place (here, factor “N” = Number of Days Starting from the date of inspection based on which direction issued or the due date of directions, Ending to the date of inspection of compliance verification or date of power disconnection, whichever is earlier)
 - R = A factor in Rupees (Rs.) for EC (In case of industrial investment in plant & machinery is less than 25 Lacs, R shall be considered 100, in other cases - 250)
 - S = Factor for scale of operation (Small Scale- 0.5, Medium- 1 and Large- 1.5)
 - LF = Location factor (Here, Regional officer shall mention Location factor (LF) in their inspection report of revocation.)
- b) Assessment of EC as per above formula and amount of applicable BG as per the BG scheme, out of whichever is higher, shall be considered for deciding final EC amount.

18.3 Assessment for levying EC for cases mentioned below:

For the cases, (i) Accidental discharges lasting for short durations resulting into damage to the environment, (ii) Intentional discharges to the environment -- land, water and air resulting into acute injury or damage to the environment. (Here, it also includes discharge of spent acid, hazardous wastes or untreated effluent through tanker or other media into water body, dumping of hazardous wastes etc.), (iii) Injection of treated/partially treated/untreated effluents to ground water. (here, it also includes illegal discharge of effluent or hazardous wastes into underground water strata i.e. through wells, bore-well, reverse boring etc) excluding permitted activity, assessment of Environmental Compensation shall be calculated as under in two parts:

- a) Interim Environmental Compensation:



Interim Environmental Compensation shall be levied as suggested by Hon'ble NGT in its order No.95 of 2018 dated 11.01.2019 as under:

1. Rs. 1 Crore for large scale industry,
2. Rs. 50 Lakh for medium scale industry,
3. Rs. 25 Lakh for small scale industry.

b) Additional Environmental Compensation:

Additional Environmental Compensation shall be levied as per the para 1.3.2. of CPCB Methodology. i.e. Based on detailed investigations from expert institutions/organizations based on which environmental compensation will be decided.

18.4 Assessment for levying EC in case of industrial accident:

In case of industrial emission due to industrial accident, Environmental Compensation shall be levied as per status of Air Quality:

State/status of Air Quality	Environmental Compensation		
	Large scale	Medium Scale	Small scale
Severe +/- Emergency	Rs. 1.0 Cr	Rs. 50 Lakh	Rs. 25 Lakh
Severe	Rs. 50 Lakh	Rs. 25 Lakh	Rs. 10 Lakh
Very Poor	Rs. 25 Lakh	Rs. 10 Lakh	
Moderate to Poor	Rs. 10 Lakh		



Here,

1. State/status of air quality shall be defined and reported by the Regional Office based on the situation of the site and analytical results/photographs.
2. In case of accident having causality, it shall be considered as severe/emergency.

18.5 Assessment for levying EC for non-compliances under Biomedical Waste.

- a) For levying Environmental Compensation if non-compliance observed under the Bio-Medical Waste Management Rules, 2016 and amendment thereof, the CPCB Guidelines for “Imposition of Environmental Compensation Charges against Healthcare Facilities and Common Biomedical Waste Treatment Facilities” shall be followed.
- b) Applicable EC shall not be less than applicable BG as per prevailing BG policy.

18.6 Assessment for levying EC for non-compliances under Plastic Waste Rules:

- a) In case closure direction issued for following non-compliances under the Plastic Waste Management Rules, 2016 and as amended thereof.
 - i Manufacturing of plastic bags, sheets or like of thickness mentioned in latest rules & manufacturing of banned items.
 - ii Non submission of EPR Action plan for Back collection of post-consumer plastic waste.
 - iii Operating without registration
- b) For levying Environmental Compensation if non-compliance observed under the Plastic Waste Management Rules, 2016 and amended thereof, the CPCB Guidelines for “Assessment of Environment Compensation to be levied for violation of Plastic Waste Management Rules, 2016” shall be followed.
- c) Applicable EC shall not be less than applicable BG as per prevailing BG policy.

18.7 Assessment for levying EC under Solid Waste Rules:

- a) In case of open burning of solid waste on land, including at landfill sites, for each such incident or default, violators including the project proponent, concessionaire, ULB, any person or body responsible for such burning, shall be liable to pay environmental compensation as under as per Para 20 of Point No. 8 of Hon’ble NGT order dated 26/03/2019 in the matter of O.A. No. 606/2018,



- i Simple Burning – Rs. 5,000/-
- ii Bulk Waste Burning – Rs. 25,000/-



18.8 For levying Environmental Compensation if non-compliance observed under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016

The CPCB Guidelines for “Determination of Environmental Compensation to be recovered for violation of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016” shall be followed with CPCB guideline for “Enforcement Framework for Effective Implementation of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016”.

18.9 Penalty calculation for tanker caught in illegal activity as per Hon’ble NGT order dated 19/02/2020 in the matter O.A. No. 44/2016.

Sr. No.	Category of Vehicle	Penalty Amount
1	Vehicles/ Equipments/ Excavators with showroom value more than Rs. 25 lacs and less than 5 years old.	Rs. 4 lacs
2	Vehicles/ Equipments/ Excavators with showroom value more than Rs. 25 lacs and more than 5 years but less than 10 years old.	Rs. 3 lacs
3	For the remaining Vehicles older than 10 years/ Equipments / Excavators which are otherwise legally permissible to be operated and not covered by Serial No. 1 and 2.	Rs. 2 lacs
<p>Note – I: On repetition of the offence by the same vehicle/ equipment, Order dated 05.04.2019 will be applicable.</p> <p>Note – II: The option of release may be available for a period of one month from the date of seizure and thereafter, the vehicles maybe confiscated and auctioned.</p>		

18.10 Assessment for levying EC for illegal activities not mentioned herein above

- a) In cases where industry/ activity which cannot be permitted/not mentioned herein above points like illegal activities. Environmental Compensation of Rs. 25 Lakh shall be levied at the time of issuing closure direction.

**18.11 Repeated violation**

- a) In case of repetition of similar violation within a year from the date of the first violation, the amount of EC shall be doubled in amount

18.12 Applicability of Scheme

- a) In cases where Specific directions issued regarding EC by Hon. NGT /Supreme Court/ High Court, in such cases this scheme is not applicable.
- b) This scheme is subject to amendment/ changes if any new guidelines provided by CPCB or any directions from Hon'ble Courts.
- c) EC amount to be levied from Industry/person shall be decided at the time of closure direction, except for cases EC is to be calculated as mentioned in para no. 1.3 of CPCB methodology (EC shall be decided at the time of revocation).
- d) Revocation order shall be issued only on receipt of EC amount by the Board.

18.13 Payment of EC in instalment (Board Office order dated 23/08/2021, Approval in Board meeting-257 dated 03/08/2021)

- a) "A minimum amount of 50% has to be deposited by the industry to pay the EC and the remaining amount can be paid in lump sum or in installments with a simple annual interest rate of 12% within a maximum period of six months from the date of approval of revocation."

18.14 Date of implementation of EC guideline (Board Office order dated 23/08/2021, Approval in Board meeting-257 dated 03/08/2021)

- a) EDC Policy shall be applicable from 28/08/2019 to those industry, who apply for first time revocation.
- b) Units where trial revocation has been granted before dated 28/08/2019 and permanent revocation has not been granted, subsequent revocations will have to be granted without levy EDC.
- c) In this matter, if any order is passed by the Hon'ble NGT, that order shall be binding on those units

**18.15 EC Committee (Board Office order dated 13/02/2023)**

- a) A Committee is being constituted to verify EC to be levied as proposed by Unit Head.
- b) All such file shall be endorsed by the members of committee and put to Member Secretary. In case of EC to be levied based on numbers of days, Unit Head shall put up to Member Secretary whenever any query on EC for number of days file to be routed through committee.
- c) Committee Chairman can invite Legal Officer/ other Unit Head for assistance required.

18.16 Decision of the Hon'ble Chairman shall be considered as final.

**Report of the CPCB In-house Committee on
Methodology for Assessing Environmental
Compensation and Action Plan to Utilize the Fund**



CENTRAL POLLUTION CONTROL BOARD
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Abstract

Environmental compensation is a policy instrument for the protection of the environment which works on the Polluter Pay Principal. Environmental compensation has already been implemented in various countries, although limited in scope. Experiences from these implementations are mixed and tend to stress the importance of certain principles in order to achieve the overall objective of protection of the environment.

The Hon'ble National Green Tribunal through its various judgments has empowered the Central Pollution Control Board to lay down the methodology to assess and recover compensation for damage to the environment and utilize such amount in terms of an action plan for protection of the environment.

An attempt has been made by the CPCB in-house Committee to develop a methodology for assessing environmental compensation to be levied on concerned industry, authority, individual etc. for the protection of environment. Expert institutions/ NGOs like The Energy and Resources Institute, Centre for Science and Environment-India, Institute of Economic Growth etc. were also consulted to finalize the report. Overall objective is to develop self-sense of responsibility towards the environment and to make defaulters realize their mistake by imposing compensation, which will be utilized for the protection/restoration of the environment.

Although, this is the first attempt in India towards development of methodology for assessing environmental compensation, however, efforts have been made to simplifying the process so that regulatory institutions can easily adopt the methodology for implementation.

Chapter-I: Environment Compensation to be levied on Industrial Units

1.1 Background

The Hon'ble National Green Tribunal (NGT), Principal Bench in the matter of OA No. 593/2017 (WP (CIVIL) No. 375/2012, Paryavaran Suraksha Samiti & Anr. Vs. Union of India & Ors. directed Central Pollution Control Board (CPCB) that:

“The CPCB may take penal action for failure, if any, against those accountable for setting up and maintaining STPs, CETPs and ETPs. CPCB may also assess and recover compensation for damage to the environment and said fund may be kept in a separate account and utilized in terms of an action plan for protection of the environment. Such action plan may be prepared by the CPCB within three months” (Annexure-I).

1.2 Constitution of the Committee

In this context, Chairman, CPCB constituted a Committee under the Chairmanship of Shri A. Sudhakar, I/c WQM-I with Shri A. K. Vidyarthi, I/c WQM-II, Shri P. K. Gupta, I/c IPC-VI, Shri Nazimuddin I/c IPC-II and Dr. S. K. Paliwal, Scientist 'D' as members. The Committee was asked to deliberate on this issue and come up with a draft formulation before 15.9.2018.

1.3 Methodology for Assessing Environmental Compensation

The Committee discussed the issue on 4.9.2018, 13.9.2018, 17.9.2018 and 09.10.2018. A meeting was also held with Senior Officers of CPCB Head Office and Regional Directorates through video conferencing on 28.09.2018 to discuss the draft report and to seek comments/feedbacks. The comments/feedbacks received and deliberations of the Committee on the same are given in **Annexure-II**.

As per the Hon'ble NGT suggestion, CPCB has invited comments of 3 expert institution, namely, Centre for Science and Environment (CSE), Institute of Economic Growth (IEG) and The Energy Research Institute (TERI). A meeting to incorporate the comments of the expert institutions and to finalize the report, was held on 27/03/2019. The CPCB in-house committee on Environmental Compensation has deliberated on the comments and finalized the report accordingly. The Committee's deliberations are attached as **Annexure-III**.

It was deliberated for developing a formula for imposing environmental compensation on industrial units for violation of directions issued by regulatory bodies and this is the first attempt made. The committee discussed that environmental compensation should be based on "Polluter Pay Principle". The Committee decided to list the instances for taking cognizance of cases fit for violation and levy environmental compensation.

Cases considered for levying Environmental Compensation (EC):

- a) Discharges in violation of consent conditions, mainly prescribed standards / consent limits.
- b) Not complying with the directions issued, such as direction for closure due to non-installation of OCEMS, non-adherence to the action plans submitted etc.
- c) Intentional avoidance of data submission or data manipulation by tampering the Online Continuous Emission / Effluent Monitoring systems.
- d) Accidental discharges lasting for short durations resulting into damage to the environment.
- e) Intentional discharges to the environment -- land, water and air resulting into acute injury or damage to the environment.
- f) Injection of treated/partially treated/ untreated effluents to ground water.

1.3.1 In the instances as mentioned at *a, b and c* above, Pollution Index may be used as a basis to levy the Environmental Compensation. CPCB has published guidelines for categorization of industries into Red, Orange, Green and White based on concept of Pollution Index (PI). The Pollution Index is arrived after considering quantity & quality of emissions/ effluents generated, types of hazardous wastes generated and consumption of resources. Pollution Index of an industrial sector is a numerical number in the range of 0 to 100 and can be represented as follows:

$$PI = f(\text{Water Pollution Score, Air Pollution Score \& HW Generation Score})$$

Pollution Index is a number from 0 to 100 and increasing value of PI denotes the increasing degree of pollution *hazard from the industrial sector*.

CPCB has issued directions to all SPCBs/PCCs on 07.03.2016 to adopt the methodology and follow guidelines prepared by CPCB for categorization of industrial sectors into Red, Orange, Green and White.

The concept of Pollution Index, which was deliberated widely with all stakeholders and agreed, shall be used for calculating Environmental Compensation. This may help in implementation of such provision throughout the country, a successful initiative in vital field of industrial pollution control.

After considering various factors including the policy implementation issues, Committee has come up with following formula for levying the Environmental Compensation in instances as mentioned at *a, b and c* including non-compliance of the environmental standards / violation of directions.

The Environmental Compensation shall be based on the following formula:

$$EC = PI \times N \times R \times S \times LF$$

Where,

- EC is Environmental Compensation in ₹
- PI = Pollution Index of industrial sector
- N = Number of days of violation took place
- R = A factor in Rupees (₹) for EC
- S = Factor for scale of operation
- LF = Location factor

The formula incorporates the anticipated severity of environmental pollution in terms of Pollution Index, duration of violation in terms of number of days, scale of operation in terms of micro & small/medium/large industry and location in terms of proximity to the large habitations.

Note:

- a. The industrial sectors have been categorized into Red, Orange and Green, based on their Pollution Index in the range of 60 to 100, 41 to 59 and 21 to 40, respectively. It was suggested that the average pollution index of 80, 50 and 30 may be taken for calculating the Environmental Compensation for Red, Orange and Green categories of industries, respectively.
- b. N, number of days for which violation took place is the period between the day of violation observed/due date of direction’s compliance and the day of compliance verified by CPCB/SPCB/PCC.
- c. R is a factor in Rupees, which may be a minimum of 100 and maximum of 500. It is suggested to consider R as 250, as the Environmental Compensation in cases of violation.
- d. S could be based on small/medium/large industry categorization, which may be 0.5 for micro or small, 1.0 for medium and 1.5 for large units.
- e. LF, could be based on population of the city/town and location of the industrial unit. For the industrial unit located within municipal boundary or up to 10 km distance from the municipal boundary of the city/town, following factors (LF) may be used:

Table No. 1.1: Location Factor Values

S. No.	Population* (million)	Location Factor# (LF)
1	1 to <5	1.25
2	5 to <10	1.5
3	10 and above	2.0

*Population of the city/town as per the latest Census of India
 #LF will be 1.0 in case unit is located >10km from municipal boundary
 LF is presumed as 1 for city/town having population less than one million.

For notified Ecologically Sensitive areas, for beginning, LF may be assumed as 2.0. However, for critically Polluted Areas, LF may be explored in future.

- f. In any case, minimum Environmental Compensation shall be ₹ 5000/day.
- g. In order to include deterrent effect for repeated violations, EC may be increased on exponential basis, i.e. by 2 times on 1st repetition, 4 times on 2nd repetition and 8 times on further repetitions.
- h. If the operations of the industry are inevitable and violator continues its operations beyond 3 months then for deterrent compensation, EC may be increased by 2, 4 and 8 times for 2nd, 3rd and 4th quarter, respectively. Even if the operations are inevitable beyond 12 months, violator will not be allowed to operate.
- i. Besides EC, industry may be prosecuted or closure directions may be issued, whenever required.

A sample calculation for Environmental Compensation (without deterrent factor) is given at Table No. 1.2. It can be noticed that for all instances, EC for Red, Orange and Green category of industries varies from 3,750 to 60,000 ₹/day.

Table No. 1.2: A sample calculation for Environmental Compensation

Industrial Category	Red	Orange	Green
Pollution Index (PI)	60-100	41-59	21-40
Average PI	80	50	30
R-Factor	250		
S-Factor	0.5-1.5		
L-Factor	1.00-2.00		
Environmental Compensation (₹/day)	10,000-60,000	6,250-37,500	5,000-22,500

1.3.2 In other instances i.e. *d, e and f*, the environmental compensation may contain two parts – one requires providing immediate relief and other long-term measures such as remediation. In all these cases, detailed investigations are required from expert institutions/organizations based on which environmental compensation will be decided. CPCB shall list the expert institutions for this purpose.

In such cases, comprehensive plan for remediation of environmental pollution may be prepared and executed under the supervision of a committee with representatives of SPCB, CPCB and expert institutions/organizations.

1.4 Action Plan for Utilization of Environmental Compensation Fund

The Committee discussed about the utilization of funds, which will be received by imposing Environmental Compensation. The following Action Plan is proposed to utilize the fund for protection of the environment.

1.4.1. When Environmental Compensation is calculated through the Pollution Index:

The amount received by imposing the Environmental Compensation to the industries / organization non-complying with the environmental standards / violating any CPCB's directions shall be deposited in a separate bank account. The amount accumulated will be utilized for Protection of Environment. The following schemes were identified, which may be considered for utilization of Environmental Compensation Fund:

- a. Industrial Inspections for compliance verification
- b. Installation of Continuous water quality monitoring stations / Continuous ambient air quality monitoring stations for strengthening of existing monitoring network
- c. Preparation of Comprehensive Industry Documents on Industrial Sectors / clean technology
- d. Investigations of environmental damages, preparation of DPRs
- e. Remediation of contaminated sites
- f. Infrastructure augmentation of Urban Local Bodies (ULBs) /capacity building of SPCBs/PCCs

The above proposed list may include other schemes also, depending upon the requirement.

Considering the availability of accumulated funds, CPCB will finalize the scheme, keeping in mind the priority, to utilize the funds of Environmental Compensation.

1.4.2. When Environmental Compensation is assessed based on actual damage to the environment by Expert Organization/ Agency:

The amount of Environmental Compensation under this case will be remediation costs, measures requiring immediate and short-term actions, compensation towards loss of ecology, etc., and will be utilized exclusively for the purpose at specific site, based on the detailed investigations by the Expert Organizations/ agencies.

1.5 Recommendations

The Committee made following recommendations:

- 1.5.1 To begin with, Environmental Compensation may be levied by CPCB only when CPCB has issued the directions under the Environment (Protection) Act, 1986. In case of a, b and c, Environmental Compensation may be calculated based on the formula "EC = PI x N x R x S x LF", wherein, PI may be taken as 80, 50 and 30 for red, orange and green category of industries, respectively, and R may be taken as 250. S and LF may be taken as prescribed in the preceding paragraphs.

- 1.5.2 In case of d, e and f, the Environmental Compensation may be levied based on the detailed investigations by Expert Institutions/Organizations.
- 1.5.3 The Hon'ble Supreme Court in its order dated 22.02.2017 in the matter of Paryavaran Suraksha Samiti and another v/s Union of India and others (Writ Petition (Civil) No. 375 of 2012), directed that all running industrial units which require "consent to operate" from concerned State Pollution Control Board, have a primary effluent treatment plant in place. Therefore, no industry requiring ETP, shall be allowed to operate without ETP.
- 1.5.4 EC is not a substitute for taking actions under EP Act, Water Act or Air Act. In fact, units found polluting should be closed/prosecuted as per the Acts and Rules.

Chapter-II: Environmental Compensation to be levied on all violations of Graded Response Action Plan (GRAP) in NCR.

2.1 Background

The CPCB In-house Committee also discussed that the EC shall also be levied on all violations of Graded Response Action Plan (GRAP) in NCR. The implementing agencies for each activity have been identified and the EC will be levied on these agencies. These violations attract graded amounts of EC depending on the state of ambient air quality, which is given in table below:

Table No. 2.1: Environmental Compensation to be levied on all violations of Graded Response Action Plan (GRAP) in Delhi-NCR.

Activity	State Of Air Quality	Environmental Compensation ()
Industrial Emissions	Severe +/-Emergency	Rs 1.0 Crore
	Severe	Rs 50 Lakh
	Very Poor	Rs 25 Lakh
	Moderate to Poor	Rs 10 Lakh
Vapour Recovery System (VRS) at Outlets of Oil Companies		
i. Not installed	Target Date	Rs 1.0 Crore
ii. Non-functional	Very poor to Severe +	Rs 50.0 Lakh
	Moderate to Poor	Rs 25.0 Lakh
Construction sites (Offending plot more than 20,000 Sq.m.)	Severe +/-Emergency	Rs 1.0 Crore
	Severe	Rs 50 Lakh
	Very Poor	Rs 25 Lakh
	Moderate to Poor	Rs 10 Lakh
Solid waste/ garbage dumping in Industrial Estates	Very poor to Severe +	Rs 25.0 Lakh
	Moderate to Poor	Rs 10.0 Lakh
Failure to water sprinkling on unpaved roads		
a) Hot-spots	Very poor to Severe +	Rs 25.0 Lakh
b) Other than Hot-spots	Very poor to Severe +	Rs 10.0 Lakh

2.2 Action Plan for Utilization of Environmental Compensation Fund

EC levied on all violations of Graded Response Action Plan (GRAP) in Delhi NCR will be deposited in the same fund and will be utilized in the same manner as mentioned in para 1.4.1 of Chapter-I of this report.

Chapter-III: Environmental Compensation to be levied in case of failure of preventing the pollutants being discharged in water bodies and failure to implement waste management rules

3.1 Background

The Hon'ble Supreme Court in its order dated 22.02.2017 in the matter of Paryavaran Suraksha Samiti and another v/s Union of India and others (Writ Petition (Civil) No. 375 of 2012), directed State Governments (including the concerned Union Territories) to set-up Sewage Treatment Plants (STPs), which are already under implementation, within the time lines already postulated. Further, the STPs, which are yet to set-up, to be completed within a period of three years, from today, i.e. by 22.02.2020.

The Hon'ble NGT in its order dated 06.12.2018 (**Annexure-III**) in the matter of Court of its own motion v/s State of Karnataka (Original Application No. 125/2017 and M.A. No. 1337/2018) has given following directions:

“Since failure of preventing the pollutants being discharged in water bodies (including lakes) and failure to implement solid and other waste management rules are too frequent and widespread, the CPCB must lay down specific guidelines to deal with the same, throughout India, including the scale of compensation to be recovered from different individuals/authorities, in addition to or as alternative to prosecution. The scale may have slabs, depending on extent of pollution caused, economic viability, etc. Deterrent effect for repeated wrongs may also be provided.”

3.2 Ideology of Environmental Compensation Formula

In compliance of the directions of the Hon'ble Tribunal, the Committee deliberated on the issue of environmental compensation to be recovered from individuals/authorities in case of failure of preventing the pollutants being discharged in water bodies and failure to implement solid and other waste management rules. The Committee has suggested that environmental compensation in these cases should be comprised of two components i.e.

1. Cost saved/benefits achieved by the concerned individual/authority by not having proper waste/sewage management system; and
2. Cost to the environment (environmental externality) due to untreated/partially treated waste/sewage because of insufficient capacity of waste/sewage management/treatment facility.

Cost saved/benefits achieved by not having proper waste/sewage management system includes the interest on capital cost of the waste/sewage management facility and daily operation and maintenance (O&M) cost associated with the facility.

The Committee suggested that annual interest rate as 10% on loan amount, borrowed by concerned individual/authority for setting-up waste/sewage management facility, may be assumed as Capital Cost Factor for calculation of environment compensation. Further, as whole O&M cost is saved by concerned individual/authority for not managing required waste/sewage management system, 100% of the O&M cost saved may be considered as O&M cost factor.

Therefore, generalized formula for Environmental Compensation may be described as:

$$EC = \text{Capital Cost Factor} \times \text{Marginal Average Capital Cost for Establishment of Waste or Sewage Management or Treatment Facility} \times (\text{Waste or Sewage Management or Treatment Capacity Gap}) + \text{O\&M Cost Factor} \times \text{Marginal Average O\&M Cost} \times (\text{Waste or Sewage Management or Treatment Capacity Gap}) \times \text{No. of Days for which facility was not available} + \text{Environmental Externality}$$

Cost to the environment due to untreated/partially treated waste/sewage discharge by concerned individual/authority may be assumed as recommended by the committee, which is mentioned below:

Table No. 3.1: Environmental externality for untreated/partially treated sewage discharge

Sewage Treatment Capacity Gap (MLD)	Marginal Cost of Environmental Externality (Rs. per MLD/day)	Minimum and Maximum value of Environmental Externality recommended by the Committee (Lacs Rs. Per Day)
Up to 200	75	Min. 0.05, Max. 0.10
201-500	85	Min. 0.25, Max. 0.35
501 and above	90	Min. 0.60, Max. 0.80

Table No. 3.2: Environmental externality for improper municipal solid waste management

Municipal Solid Waste Management Capacity Gap (TPD)	Marginal Cost of Environmental Externality (Rs. per ton per day)	Minimum and Maximum value of Environmental Externality recommended by the Committee (Lacs Rs. Per Day)
Up to 200	15	Min. 0.01, Max. 0.05
201-500	30	Min. 0.10, Max. 0.15
501-1000	35	Min. 0.25, Max. 0.35
1001-2000	40	Min. 0.50, Max. 0.60
Above 2000		Max. 0.80

The Committee further decided to fix a cap for minimum and maximum cost for capital and O&M component for Environmental Compensation, which are given in below tables:

Table No. 3.3: Minimum and Maximum EC to be levied for untreated/partially treated sewage discharge

Class of the City/Town	Mega-City	Million-plus City	Class-I City/Town and others
Minimum and Maximum values of EC (Total Capital Cost Component) recommended by the Committee (Lacs Rs.)	Min. 2000 Max. 20000	Min. 1000 Max. 10000	Min. 100 Max. 1000
Minimum and Maximum values of EC (O&M Cost Component) recommended by the Committee (Lacs Rs./day)	Min. 2 Max. 20	Min. 1 Max. 10	Min. 0.5 Max. 5

Table No. 3.4: Minimum and Maximum EC to be levied for improper municipal solid waste management

Class of the City/Town	Mega-City	Million-plus City	Class-I City/Town and others
Minimum and Maximum values of EC (Capital Cost Component) recommended by the Committee (Lacs Rs.)	Min. 1000 Max. 10000	Min. 500 Max. 5000	Min. 100 Max. 1000
Minimum and Maximum values of EC (O&M Cost Component) recommended by the Committee (Lacs Rs./day)	Min. 1.0 Max. 10.0	Min. 0.5 Max. 5.0	Min. 0.1 Max. 1.0

The application of formula for calculation of EC may be further understood with the example of two typical cases.

3.3 Environment Compensation for Discharge of Untreated/Partially Treated Sewage by Concerned Individual/Authority:

BIS IS-1172:1993 suggests that for communities with population above 100,000, minimum of 150 to 200 lpcd of water demand is to be supplied. Further, 85% of return rate (CPHEEO Manual on Sewerage and Sewage Treatment Systems, 2013), may be considered for calculation of total sewage generation in a city. CPCB Report on "Performance evaluation of sewage treatment plants under NRCD, 2013", describes that the capital cost for 1 MLD STP ranges from 0.63 Cr. to 3 Cr. and O&M cost is around Rs. 30,000 per month. After detail deliberations, the Committee suggested to assume capital cost for STPs as Rs. 1.75 Cr/MLD (marginal average cost). Further, expected cost for conveyance system is assumed as Rs. 5.55 Cr./MLD (marginal average cost) and annual O&M cost as 10% of the combined capital cost. Population of the city may be taken as per the latest Census of India. Based on these assumptions, Environmental Compensation to be levied on concerned ULB may be calculated with the following formula:

EC= Capital Cost Factor x [Marginal Average Capital Cost for Treatment Facility x (Total Generation-Installed Capacity) + Marginal Average Capital Cost for Conveyance Facility x (Total Generation -Operational Capacity)] + O&M Cost Factor x Marginal Average O&M Cost x (Total Generation- Operational Capacity) x No. of Days for which facility was not available + Environmental Externality x No. of Days for which facility was not available

Alternatively;

EC (Lacs Rs.) = [17.5(Total Sewage Generation – Installed Treatment Capacity) + 55.5(Total Sewage Generation-Operational Capacity)] + 0.2(Sewage Generation-Operational Capacity) x N + Marginal Cost of Environmental Externality x (Total Sewage Generation-Operational Capacity) x N

Where; N= Number of days from the date of direction of CPCB/SPCB/PCC till the required capacity systems are provided by the concerned authority

Quantity of Sewage is in MLD

Table No. 3.5: Sample calculation for EC to be levied for discharge of untreated/partial treated Sewage

City	Delhi	Agra	Gurugram	Ambala
Population (2011)	1,63,49,831	17,60,285	8,76,969	5,00,774
Class	Mega-City	Million-plus City	Class-I Town	Class-I Town
Sewage Generation (MLD) (as per the latest data available with CPCB)	4195	381	486	37
Installed Treatment Capacity (MLD) (as per the latest data available with CPCB)	2500	220	404	45.5
Operational Capacity (MLD) (as per the latest data available with CPCB)	1900	140	300	24.5
Treatment Capacity Gap (MLD)	2295	241	186	12.5
Calculated EC (capital cost component for STPs) in Lacs Rs.	29662.50	2817.50	1435.00	0.00
Calculated EC (capital cost component for Conveyance System) in Lacs. Rs.	127372.50	13375.50	10323.00	693.75
Calculated EC (Total capital cost component) in Lacs Rs.	157035.00	16193.00	11758.00	693.75
Minimum and Maximum values of EC (Total Capital Cost Component) recommended by the Committee (Lacs Rs.)	Min. 2000 Max. 20000	Min. 1000 Max. 10000	Min. 100 Max. 1000	Min. 100 Max. 1000
Final EC (Total Capital Cost Component) in Lacs Rs.	20000.00	10000.00	1000.00	693.75
Calculated EC (O&M Component in Lacs Rs./day)	459.00	48.20	37.20	2.50
Minimum and Maximum values of EC (O&M Cost Component) recommended by the Committee (Lacs Rs./day)	Min. 2 Max. 20	Min. 1 Max. 10	Min. 0.5 Max. 5	Min. 0.5 Max. 5
Final EC (O&M Component) in Lacs. Rs./Day	20.00	10.00	5.00	2.50
Calculated Environmental Externality (Lacs Rs .Per Day)	2.0655	0.2049	0.1395	0.0094
Minimum and Maximum value of Environmental Externality recommended by the Committee (Lacs Rs. Per Day)	Min. 0.60 Max. 0.80	Min. 0.25 Max. 0.35	Min. 0.05 Max. 0.10	Min. 0.05 Max. 0.10
Final Environmental Externality (Lacs Rs. Per day)	0.80	0.25	0.10	0.05

3.4 Environment Compensation to be Levied on Concerned Individual/Authority for Improper Solid Waste Management:

It is known that estimated MSW generation is approximately 1.5 lakh MT/Day in India (MoHUA Report-2016). As per the principles of SWM Rules, 2016 and PWM Rules 2016, as amended in 2018, the total cost of Municipal Solid Waste management in a city/town includes cost for door to door collection, cost of segregation at source, cost for transportation in segregated manner, cost for processing of MSW and disposal through facility like composting, biomethanation, recycling, co-processing in cement kilns etc.

In view of above, it is estimated that the total cost of processing and treatment of MSW for a city having population size of 1 lakh and generating approximately 50 tons/day of MSW is Rs.15.5 Crores, including capital cost (one time) and O & M cost for one year. The expenditure for subsequent years would be only Rs. 3.5 crores/annum.

CPCB sponsored a survey to ascertain the status of municipal solid waste disposal in 59 cities/towns of India. The survey was conducted by the Environment Protection Training Research Institute (EPTRI), Hyderabad. As per the survey, it is estimated that solid waste generated in small, medium and large cities and towns is about 0.1 kg (Class-III), 0.3-0.4 kg (Class-II) and 0.5 kg (Class-I) per capita per day respectively. The committee opined that 0.6 kg/day, 0.5 kg/day and 0.4 kg/day per capita waste generation may be assumed for mega-cities, million-plus UAs/towns and Class-I UA/Towns respectively for calculation of environmental compensation purposes. Based on these assumptions, Environmental Compensation to be levied on concerned ULB may be calculated with the following formula:

EC = Capital Cost Factor x Marginal Average Cost for Waste Management x (Per day waste generation-Per day waste disposed as per the Rules) + O&M Cost Factor x Marginal Average O&M Cost x (Per day waste generation-Per day waste disposed as per the Rules) x Number of days violation took place + Environmental Externality x N

Where;

Waste Quantity in tons per day (TPD)

N= Number of days from the date of direction of CPCB/SPCB/PCC till the required capacity systems are provided by the concerned authority

Simplifying;

EC (Lacs Rs.) = 2.4(Waste Generation - Waste Disposed as per the Rules) +0.02 (Waste Generation - Waste Disposed as per the Rules) x N + Marginal Cost of Environmental Externality x (Waste Generation - Waste Disposed as per the Rules) x N

Table No. 3.6: Sample calculation for EC to be levied for improper management of Municipal Solid Waste

City	Delhi	Agra	Gurugram	Ambala
Population (2011)	1,63,49,831	17,60,285	8,76,969	5,00,774
Class	Mega-City	Million-plus City	Class-I Town	Class-I Town
Waste Generation (kg. per person per day)	0.6	0.5	0.4	0.4
Waste Generation (TPD)	9809.90	880.14	350.79	200.31
Waste Disposal as per Rules (TPD) (<i>assumed as 25% of waste generation for sample calculation</i>)	2452.47	220.04	87.70	50.08
Waste Management Capacity Gap (TPD)	7357.42	660.11	263.09	150.23
Calculated EC (capital cost component) in Lacs. Rs.	17657.82	1584.26	631.42	360.56
Minimum and Maximum values of EC (Capital Cost Component) recommended by the Committee (Lacs Rs.)	Min. 1000 Max. 10000	Min. 500 Max. 5000	Min. 100 Max. 1000	Min. 100 Max. 1000
Final EC (capital cost component) in Lacs. Rs.	10000.00	1584.26	631.42	360.56
Calculated EC (O&M Component) in Lacs. Rs./Day	147.15	13.20	5.26	3.00
Minimum and Maximum values of EC (O&M Cost Component) recommended by the Committee (Lacs Rs./Day)	Min. 1.0 Max. 10.0	Min. 0.5 Max. 5.0	Min. 0.1 Max. 1.0	Min. 0.1 Max. 1.0
Final EC (O&M Component) in Lacs. Rs./Day	10.00	5.00	1.00	1.00
Calculated Environmental Externality (Lacs Rs. Per Day)	2.58	0.18	0.03	0.02
Minimum and Maximum value of Environmental Externality recommended by the Committee (Lacs Rs. per day)	Max. 0.80	Min. 0.25 Max. 0.35	Min. 0.01 Max. 0.05	Min. 0.01 Max. 0.05
Final Environmental Externality (Lacs Rs. per day)	0.80	0.25	0.03	0.02

3.3 Action Plan for Utilization of Environmental Compensation Fund

EC levied in case of failure of preventing the pollutants being discharged in water bodies and failure to implement waste management rules will be deposited in the same fund and will be utilized in the same manner as mentioned in para 1.4.1 of Chapter-I of this report.

3.4 Recommendations

1. The Committee recommended that to begin with, Environmental Compensation to be recovered from individuals/authorities in case of failure of preventing the pollutants being discharged in water bodies and failure to implement solid waste management rules may be calculated with the methodology described in the report.
2. If mixing of Bio-medical Waste or Hazardous Waste is found in Municipal Solid Waste than capital cost component of EC may be increased by a multiplication factor of 1.5.

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3. In order to include deterrent effect for continuous violations, component of O&M and Environmental Externality in EC formula may be increased on exponential basis by 2, 4, and 8 times after every six-months, beyond the time prescribed by authority for ensuring complete treatment of sewage/waste of the city/town.

Chapter-IV: Environmental Compensation in Case of Illegal Extraction of Ground Water

4.1 Background

The Hon'ble National Green Tribunal (NGT), Principal Bench in the matter of Shailesh Singh v/s Central Ground Water Board & Ors. (Original Application No. 327/2018) vide order dated 03/01/2019 (**Annexure-V**) directed Central Pollution Control Board (CPCB) that:

“CPCB may constitute a mechanism to deal with individual cases of violation of norms, as existed prior to Notification of 12/12/2018, to determine the environment compensation to be recovered or other coercive measures to be taken, including prosecution, for past illegal extraction of ground water, as per law.”

4.2 Constitution of the Committee

In compliance to Hon'ble NGT dated 03/01/2019, CPCB constituted a committee under the Chairmanship of Shri A. Sudhakar, DH, WQM-I Division with Shri P. K. Gupta, DH, IPC-VI, Shri Vishal Gandhi, Sc. D, UPC-I Division and Smt. Suniti Parashar, Scientist B, WQM-I Division as members. The committee was asked to deliberate on this issue and come up with draft formulation of mechanism to determine the Environmental Compensation for illegal extraction of ground water.

4.3 Methodology for Assessing Environmental Compensation

The committee discussed the issue on 07/02/2019, 07/03/2019 and 20/3/2019. The committee deliberated on the issue of Environmental Compensation to be recovered from individuals/industries such as domestic, packaging drinking water units, mining & infrastructure projects and industrial units in case of illegal extraction of ground water. The Guidelines/Criteria for evaluation of proposals/requests for Ground Water Abstraction, 2015 were also discussed and based on this further formulation to levy Environmental Compensation has been evolved.

4.4 Ideology of Environmental Compensation w.r.to illegal extraction of ground water

Ground water is becoming an increasingly scarce resource because of its unabated and indiscriminate over-exploitation. Growth in ground water exploitation, however, has led to a steep fall in water table in several parts of the country. Use of ground water is becoming unsustainable day by day. The falling water table is a matter of special concern since it tends to reduce the accessibility of the resource to small and marginal farmers due to increase in costs of extractions.

Specific conditions applicable in Notified/Non-Notified areas for various users, as mentioned in Guidelines/Criteria for evaluation of proposals/requests for Ground Water Abstraction, 2015 are given below:

For Notified Areas:

1. Permission to abstract ground water through any energized means will not be accorded for any purpose other than drinking water.

2. Central Ground Water Authority (CGWA) so far has notified 162 areas, in the country for the purpose of regulation of ground water development.
3. Regulation of Ground Water development in Notified areas is through District Administrative Heads assisted by Advisory Committees under the provisions of Section 4 of the Environment (Protection) Act, 1986.
4. In Notified areas, ground water use in individual houses, infrastructure complexes like group housing societies, hospitals, schools etc. and drinking water requirements of workers in industries can be allowed.
5. NOC for ground water withdrawal will be considered only if Water Supplying Department is not providing adequate water in the area/premises. Proof for this is to be produced from the concerned authority by the applicant.
6. For individual houses, the maximum diameter of the tube-well should be restricted to 4 inch only and the capacity of the pump should not exceed 1HP. For infrastructure projects, maximum diameter of the ground water abstraction structures should be restricted to 150 mm (6 inches) only and capacity of the pump should not exceed 5 HP.
7. Any violation of the above conditions will attract legal action under Section 15 of the Environment (Protection) Act, 1986.

For Non-Notified Areas:

NOC for ground water withdrawal will be considered for industries/infrastructure/packaging as per safe, semi critical, critical and over-exploited criteria.

4.5 Formula for Environmental Compensation for illegal extraction of ground water

The committee decided that the formula should be based on water consumption (Pump Yield & Time duration) and rates for imposing Environmental Compensation for violation of illegal abstraction of ground water. The committee has proposed following formula for calculation of Environmental Compensation (EC_{GW}):

$EC_{GW} = \text{Water Consumption per Day} \times \text{No. of Days} \times \text{Environmental Compensation Rate for illegal extraction of ground water (ECR}_{GW})$
--

Where water Consumption is in m^3/day and ECR_{GW} in $Rs./m^3$

Yield of the pump varies based on the capacity/power of pump, water head etc. For reference purpose, yield of the pump may be assumed as given in **Annexure-VI**.

Time duration will be the period from which pump is operated illegally.

In case of illegal extraction of ground water, quantity of discharge as per the meter reading or as calculated with assumptions of yield and time may be used for calculation of EC_{GW} .

4.6 Environmental Compensation Rate (ECR_{GW}) for illegal use of Ground Water

The committee decided that the Environmental Compensation Rate (ECR_{GW}) for illegal extraction of ground water should increase with increase in water consumption as well as water scarcity in the area. Further, ECR_{GW} are kept relaxed for drinking and domestic use as compared to other uses, considering the basic need of human being.

As per CGWB, safe, semi-critical, critical and over-exploited areas are categorized from the ground water resources point of view (CGWB, 2017). List of safe, semi-critical, critical and over-exploited areas are available on the website of CGWB and can be accessed from- <http://cgwa-noc.gov.in/LandingPage/NotifiedAreas/CategorizationOfAssessmentUnits.pdf#ZOOM=150>.

Environmental Compensation Rates (ECR_{GW}) for illegal use of ground water (ECR_{GW}) for various purposes such as drinking/domestic use, packaging units, mining and industrial sectors as finalized by the committee are given in tables below:

4.6.1 ECR_{GW} for Drinking and Domestic use:

Drinking and Domestic use means uses of ground water in households, institutional activity, hospitals, commercial complexes, townships etc.

Sl. No.	Area Category	Water Consumption (m^3/day)			
		<2	2 to <5	5 to <25	25 & above
Environmental Compensation Rate (ECR_{GW}) in Rs./ m^3					
1	Safe	4	6	8	10
2	Semi Critical	12	14	16	20
3	Critical	22	24	26	30
4	Over-Exploited	32	34	36	40
Minimum EC_{GW}=Rs 10,000/- (for households) and Rs. 50,000 (for institutional activity, commercial complexes, townships etc.)					

4.6.2 ECR_{GW} for Packaged drinking water units:

Sl. No.	Area Category	Water Consumption (m^3/day)			
		<200	200 to <1000	1000 to <5000	5000 & above
Environmental Compensation Rate (ECR_{GW}) in Rs./ m^3					
1	Safe	12	18	24	30
2	Semi critical	24	36	48	60
3	Critical	36	48	66	90
4	Over-exploited	48	72	96	120
Minimum EC_{GW}=Rs 1,00,000/-					

4.6.3 ECR_{GW} for Mining, Infrastructure and Dewatering Projects

Sl. No.	Area Category	Water Consumption (m^3/day)			
		<200	200 to <1000	1000 to <5000	5000 & above
Environmental Compensation Rate (ECR_{GW}) in Rs./ m^3					
1	Safe	15	21	30	40
2	Semi critical	30	45	60	75
3	Critical	45	60	85	115
4	Over-exploited	60	90	120	150
Minimum EC_{GW}=Rs 1,00,000/-					

4.6.4 ECR_{GW} for Industrial Units:

Sl. No.	Area Category	Water Consumption (m ³ /day)			
		<200	200 to <1000	1000 to <5000	5000 & above
		Environmental Compensation Rate (ECR _{GW}) in Rs./m ³			
1	Safe	20	30	40	50
2	Semi critical	40	60	80	100
3	Critical	60	80	110	150
4	Over-exploited	80	120	160	200
Minimum EC_{GW}=Rs 1,00,000/-					

For better understanding of implementation of EC_{GW} policy, some example calculations are given below:

Example No. 1 (For drinking and domestic Use):

It is observed that a household in safe zone is extracting ground water illegally from past 2 year and 3 months with the help of 1 HP pump, dia 4 inches and head as 25 meter. It is assumed that the house-owner runs the pump for 0.5 hr/day. What Environmental Compensation (EC_{GW}) will be charged to the owner?

Solution: Pump Yield (Please refer Annexure-VI) = 3 m³/hr
 Daily Consumption = 3 x 0.5 = 1.5 m³
 ECR_{GW} = 4 Rs./m³ (Please refer para 4.6.1)
 EC to be levied = 4 x 1.5 = 6 Rs./day
 Total time period = 820 days

Then, EC_{GW} = 6 x 820

Calculated EC_{GW} = 4,920 Rs.

EC_{GW} to be levied = 10,000 Rs. (minimum prescribed EC_{GW}, please refer para 4.6.1)

Example 2 (For Industrial Units):

It is observed that an industry in critical zone is extracting ground water illegally from past 1 year with the help of 5 HP pump, dia 6 inches and head as 50 meter. It is assumed that the industry runs the pump for 3 hrs/day. What Environmental Compensation (EC_{GW}) will be charged to the owner?

Solution: Pump Yield (Please refer Annexure-VI) = 12 m³/hr
 Daily Consumption = 12 x 3 = 36 m³/day
 ECR_{GW} = 60 Rs./m³ (Please refer para 4.6.4)
 EC to be levied = 60 x 36 = 2,160 Rs./day
 Total time period = 365 days

Then, EC_{GW} = 2,160 x 365

EC_{GW} = 7,88,400 Rs.

4.7 Relaxation

Central Ground Water Authority (CGWA) reserves to right to relax or interpret these mechanisms in case of any exigency or situation of National strategic importance, as per Guidelines/Criteria for evaluation of proposals/requests for Ground Water Abstraction, 2015.

4.8 Recommendations

The committee has given following recommendations:

- The minimum Environmental Compensation for illegal extraction of ground water for domestic purpose will be Rs. 10,000, for institutional/commercial use will be 50,000 and for other uses will be 1,00,000.
- In case of fixation of liability, it always lies with current owner of the premises where illegal extraction is taking place.
- Time duration may be assumed to be one year in case where no evidence for period of installation of bore well could be established.
- For Drinking and Domestic use, where metering is not present but storage tank facility is available, minimum water consumption per day may be assumed as similar to the storage capacity of the tank.
- For industrial ground water use, where metering is not available, water consumption may be assumed as per the consent conditions. Further, where in case industry is operating without consent, water consumption may be calculated based on the plant capacity (on the recommendation of SPCB/PCC, if required). SPCB/PCC may bring the issue of illegal extraction of ground water in industries in to the notice of CGWA for appropriate action by CGWA.
- Authorities assigned for levy EC and taking penal action are listed below:

S. No.	Actions	Authority
1.	To seal the illegal bore-well/tube-well to stop extraction of water and further closure of project	District Collector
2.	To levy EC _{GW} as per prescribed method	District Collector, CGWA
3.	To levy EC on water pollution, as per the method prescribed in report of CPCB- "EC on industrial pollution"	CPCB/SPCB/PCC
4.	Prosecution of violator	CGWA under EP Act SPCB/PCC under Air and Water Act

- CGWA may maintain a separate account for collection and utilization of fund, collected through the prescribed methodology in this report.

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 593/2017
(W.P. (Civil) No. 375/2012)

In the matter of:

Paryavaran Suraksha Samiti & Anr.
Vs.
Union of India & Ors.

CORAM : HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE DR. JUSTICE JAWAD RAHIM, JUDICIAL MEMBER
HON'BLE MR. JUSTICE S.P. WANGDI, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER

Present: Applicant: Mr. Rohit Prajapati, Applicant in person
Amicus Curiae: Mr. Jai A. Dehadrai, Adv.
Respondent Nos. Mr. Nishe Rajan Shonker, Adv. for State of Kerala
Mr. Tarunvir Singh Khehar, Ms. Guneet Khehar
Mr. Sandeep Mishra Advs. for GNCTD
Mr. Anil Shrivastava Mr Rituraj Bswas and
Ms. Sujaya Bardhan, Advs. for State of Arunachal Pradesh
Mr. Jogy Scaria, Ms. Beena Victor, Advs. for Kerala State Pollution Control Board
Mr. Avijit Roy, Adv. for Assam Pollution Control Board
Mr. Leishangthem Roshmani Kh, Ms. Maibam Babina, Advs. for State of Manipur
Mr. Nikhil Nayyar, Mr. Dhananjay Baijal, Advs. for APCCB and TSPCB
Mr. Mukesh Verma, Adv.
Mr. Tarunvir Singh Khehar, Adv., Mr. Sandeep Mishra and Ms. Guneet Khehar, Adv.
Mr. Dinesh Jindal, LO for DPCC
Ms. Aruna Mathur, Mr. Avneesh Arputham, Ms. Simraj Jeet and Ms. Anuradha Arputham, Advs. for State of Sikkim
Mr. Raja Chatterjee, Mr. Piyush Sachdev, Ms. Abhinandini Yadav, Advs. and Advs. for State of WB
Mr. Edward Belho, AAG, Mr. K. Luikang Michael and Ms. Hoinethiam, Advs. for State of Nagaland
Ms. Enatoli Sema, Adv. for State of Nagaland and Pollution Control Board
Mr. M. Paikaray and Mr. A.K. Panda, Advs. for SPCCB, Odisha
Mr. Dhruv Pal, Adv. for State of Gujarat
Mr. V.K. Shukla, Adv. for State of MP
Mr. Jayesh Gaurav, Adv. for R-47
Mr. Tayenjam Momo Singh, Adv. for Meghalaya Pollution Control Board
Mr. Shlok Chandra and Mr. Ritesh Kumar Sharma, Advs.
Mr. Gautam Singh and Mr. Shoeab Alam, Advs. for State of Bihar
Ms. Aprajita Mukherjee, Adv.
Ms. G. Indira, Adv. for UT of Andaman & Nicobar
Mr. Balendu Shekhar, Mr. Sriansh Prakash and Mr. Rajkumar Maurya, Advs. for Ministry of Environment, Forest and Climate Change
Ms. Puja Kalra, Adv. for SDMC & NDMC
Mr. Anil Grover, AAG, Mr. Rahul Khurana and Mr. Mishal Vij, Advs. for State of Haryana and HSPCB

Ms. Yogmaya Agnihotri, Adv. and Ms. Prity, Adv. for CECB
 Ms. Sakshi Popli, Adv. for Ministry of Environment, Forest and Climate Change
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 Mr. Shashank Bajpai and Mr. Shakun S. Shukla, Adv. for State of Odisha
 Ms. Asha Nayar Basu and Ms. Aradhita Ghosh Mandal, Adv.
 Ms. Priyanka Sinha, Adv. for State of Jharkhand
 Mr. Rajul Shrivastav, Adv. for MPPCB
 Mr. Pradeep Misra and Mr. Daleep Dhyani Adv. for UPPCB
 Mr. R. Rakesh Sharma and Mr. V. Mowli, Adv. for State of TN & TNPCB
 Mr. Shubham Bhalla, Adv.
 Mr. Shiv Mangal Sharma, AAG, Mr. Saurabh Rajpal, Mr. Adhiraj Singh, Ms. Shikha Sandhu and Mr. Vikrmjeet singh, Adv. for State of Rajasthan and Pollution Control Board
 Mr. G. M. Kawoosa, Adv. for State of J & K
 Mr. Divya Prakash Pande, Adv. For HPSPCB
 Mr. Manish Kumar, Adv.

Date and Remarks	Orders of the Tribunal
<p>Item No. 12 August 03, 2018 A</p>	<p>1. This matter was taken by this Tribunal in furtherance to the orders of the Hon'ble Supreme Court dated 22.02.2017 <i>Paryavaran Suraksha Samiti Vs. Union of India</i> (2017) 5 SCC 326, establishment and functioning of ETPs/CETP/STPs.</p> <p>2. Vide order dated 25.05.2017, Notice was issued to Central Pollution Control Board and all the States Pollution Control Boards/Committees and the Ministry of Environment, Forest and Climate Change. They were directed to file status-cum-compliance report in terms of the orders of the Hon'ble Supreme Court. Accordingly, various status reports have been filed. An affidavit has been filed by the Ministry of Environment, Forest and Climate Change dated 04th July, 2017 stating as follows:</p> <p style="padding-left: 40px;"><i>"4. That the answering Respondent is engaged in policy formulation, prescribing standards and its implementation through the Central Pollution Control Board (CPCB), State Pollution Control Boards (SPCBs) and Pollution Control Committees (PCCs) for UTs. This Ministry has written to all SPCBs and PCCs as well as to CPCB to ensure compliance of the judgment of the Hon'ble Supreme Court and to submit detailed compliance report.</i></p>

	<p>Item No. 12</p> <p>August 03, 2018</p> <p>A</p>	<p>5. That the CPCB has also followed up with all SPCBs and PCCs through letters and review meetings to ensure compliance of the aforementioned judgment and that the matter was also discussed in the 62nd Conference of the Chairmen and Member Secretaries of SPCBs and PCCs held on 27.06.2017. That 26 SPCBs/PCCs have submitted the compliance report, which has been summarized at Annexure-I.</p> <p>6. That the CPCB has also carried out inspections of 17 categories of industries to verify compliance with its directions issued on online effluent/emission monitoring system and to cross-verify online results with manual sampling. During February-June, 2017, 64 industries were inspected and directions under section 5 of the Environment (Protection) Act, 1986 have been issued to 24 non-complying industries; 18 industries were complying; 8 were found closed and inspection reports of 14 industries are under process.</p> <p>7. That the CPCB and NMCG through 11 technical institutions, inspected 751 industries located in the River Ganga main stem during March-April, 2017 to verify the status of installation and connectivity of industries discharging effluents as well as their compliance with the standards. Closure directions have been issued to 154 industries; show cause notices issue to 36 industries; 149 industries were found complying and direction issued to 91 self-closed Grossly Polluting Industries (GPI) to remain closed; 93 GPI units were found closed as per directions; 38 GPI units found operational in violation of closure directions and inspection reports of 190 industries are under process".</p> <p>3. We have heard learned Amicus Curiae Sh. Jai A. Dehadrai and the learned counsel for Ministry of Environment, Forest and Climate Change, Central Pollution Control Board, various State Pollution Control Boards and the Pollution Control Committees.</p> <p>4. Learned Amicus Curiae has drawn our attention to orders dated 04.07.2017, 18.09.2017 and 11.10.2017 of the Tribunal directing the State Pollution Control Boards to file a statement as to how many Industrial Units discharging trade effluents or causing emissions exist in the State, how many are having their own STPs, ETPs and/or connected to Common Effluent Treatment Plant</p>
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	<p>Item No. 12</p> <p>August 03, 2018 A</p>	<p>(CETP), whether any such CETP or ETP or STP is properly functioning and treating the effluents as per prescribed limits or not.</p> <p>5. Learned Amicus Curiae submitted that contamination of water due to industrial effluents can lead to various diseases and adverse consequences on the aquatic organism due to decreased level of oxygen. The use of technology can help reduction of adverse consequences. However, the best solution is to prevent pollution by soil conservation and proper disposal of toxics and chemicals which may include chemical recycling.</p> <p>6. Having monitored the matter for the last more than one year on several dates, we are of the view that the matter requires continuous monitoring by statutory authorities as per directions which we proceed to issue today.</p> <p>(i) We direct the Central Pollution Control Board (CPCB) to forthwith prepare an action plan after looking into all the status reports. The action plans must have mechanism to ensure compliance or all the directions in the order of the Hon'ble Supreme Court. To enable this to be done, a Nodal officer must be identified to deal with the issue of CETPs/ETPs/STPs.</p> <p>(ii) A representative of the Ministry of Environment, Forest and Climate Change may be associated with the Nodal Officer of the CETP for monitoring. The Monitoring by the said two officers- the representative of the MoEF and the Nodal Officer of the CPCB must be held atleast once in a month and on the basis of such meeting and the feedback taken further follow up action must be taken and</p>
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	<p>Item No. 12</p> <p>August 03, 2018</p> <p>A</p>	<p>appropriate directions issued. This process may be a continuous process.</p> <p>(iii) It must be ensured that STPs, CETPs and ETPs are functional and meet the requisite standards.</p> <p>(iv) There is already a direction in the above judgment under which 50% of the funds for the purpose are to be provided by the Central Government, 25% by the States and remaining 25% to be arranged by way of loans which is to be re-paid by the user industries. Local bodies and the States have duties as clearly stipulated in the judgment. There has to be online monitoring system by each State to display emission levels in public domain in terms of paragraph 17 of the order of the Hon'ble Supreme Court.</p> <p>(v) A report of the steps taken may be placed on the website of the Central Pollution Control Board atleast once in three months. Deficiencies if any may also be so displayed.</p> <p>(vi) The Central Pollution Control Board may take penal action for failure, if any, against those accountable for setting up and maintaining STPs, CETPs and ETPs Central Pollution Control Board may also assess and recover compensation for damage to the environment and the said fund be kept in a separate account and utilized in terms of an action plan for protection of the environment. Such action plan may be prepared by the Central Pollution Control Board within three months from today.</p> <p>(vii) A compliance report in terms of the above order may be furnished to this Tribunal within four months from today by e-mail at filing.ngt@gmail.com.</p>
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<p>Item No. 12</p> <p>August 03, 2018</p> <p>A</p>	<p>(7) Proceedings are disposed of.</p> <p>However, the report received from the Central Pollution Control Board may be placed for consideration before this Tribunal on 04.09.2018.</p> <p>We place on record our appreciation for the services rendered by the learned Amicus Curiae.</p> <div style="text-align: right; margin-top: 20px;"> <p>....., CP (Adarsh Kumar Goel)</p> <p>....., JM (Dr. Jawad Rahim)</p> <p>....., JM (S.P. Wangdi)</p> <p>....., EM (Dr. Nagin Nanda)</p> </div> <div style="text-align: right; margin-top: 10px;"> <p>03.08.2018</p> </div>
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Annexure-II
Comments Received from Various RDs on Draft Report for Environmental Compensation

S. No.	Item	RD Kolkata	RD Vadodara	RD Bengaluru	RD Lucknow	Committee Deliberations
1	Case- a, b & c	By passing of effluent/emission should be given special consideration. EC levied on ROG categories of industries should be on the basis of inspection by CPCB, complaint verification and routine inspection.	Instead of "Compensation", "Penalty" word should be used. In case common facilities like CETPs, factor may be introduced based on member industries. Clarify the applicability of penalty in addition to closure directions for pro-longed and gross non-compliance.			The Committee discussed that the points highlighted by RD Kolkata are already the part of cases fit for violation and levy environmental compensation. However, as mentioned by RD Vadodara, word "Penalty" may be used for case a, b and c. For CETPs, a factor may be considered in future based on the capacity of the plant.
2	Case- d, e & f	Higher rates for irreparable damages crop, soil, health etc. Leakages/spillage should have different compensation value.	It should be mentioned that instances d, e & f shall be dealt for environmental compensation in line with the polluter pays principle, besides of environmental penalty for cases a, b and c.	Similar to 'Guidelines on Liabilities for Environmental Damages due to Handling & Disposal of Hazardous Waste and Penalty', Guidelines may be prepared.		Suggestions made by RD Kolkata and Vadodara has already been taken care. Concept of environmental compensation is based on the philosophy of "polluters pay" and for grievance injury to environment, compensation will be charged as per the assessment of remediation cost, on case to case basis.
3	Pollution Index (PI)			Instead of average PI, Actual PI may be used.		Committee suggested that to make the implementation of EC simple and easy, use of average PI may be considered for calculation of EC.
4	R-factor	Should be based on pollution load. For ex. Amount of BOD/NOx etc. discharged.		May be classified based on the contribution of pollution load based on quantity of effluent, concentration, emissions	May be as per the category of industry, for ex. Red-500, Orange-300, Green-100.	As PI is based on the pollution load, suggestion of RDs are already taken care in the formula.
5	L-factor			May be redefined based on the features, activities involved and habitation.		L-factor may be covered in future as already indicated in the report.

S. No.	Item	RD Kolkata	RD Vadodara	RD Bengaluru	RD Lucknow	Committee Deliberations
6	Defining period of violations for which EC will be levied		Duration of violations needs more clarity.	For industry having OCEMS, no. of days may be counted based on the recorded data. Industry without OCEMS- based on break down of ETP/APCD, disturbance of power supply or any failure of auxiliary machineries w.r.t. control system.	May be clearly defined as the period between the day of violation observed and the day of compliance verified by CPCB/SPCB/PCC.	The committee agreed that period of violation for which EC may be levied will be the period between the day of violation observed and the day of compliance verified by CPCB/SPCB/PCC.
7	Repeated Violations		Some number of days may be specified after which the penalty amount may get a factor of 1.5 or 2.		Multiplying factor for repeated violations may be included. For ex. 1 st Repetition- 25% 2 nd Repetition- 50% 3 rd Repetition- 100%	For habitual offenders, higher amount of penalty/compensation may be charged in future.
8	Utilization of fund	An environmental damage assessment cell may be created. Expertise in the field may be achieved by involving scientist/engineers and providing them training in country/abroad.	Amount should not be utilized for a) Industrial Inspections for compliance verification, b) Installation of Continuous water quality monitoring stations / Continuous ambient air quality monitoring stations for strengthening of existing monitoring network, c) Preparation of Comprehensive Industry Documents on Industrial Sectors / clean technology f) Funding to financially weaker municipalities for installation of STPs The amount should be utilized solely for damage assessment, remediation of affected sites, orphan contaminated sites and creating awareness. The purpose should not get inclined towards revenue generation.			RD Vadodara suggested that amount should be utilized only for remediation purpose. However, committee discussed that the proposal for utilization of fund is prepared considering the other aspects (i.e. direct and indirect) for protection of environment, which include research, monitoring etc. Suggestion of RD Kolkata may be considered in future.

9	Others	Higher EC for non-installation of pollution control measures. Expected sources should have different scoring methodology based on their weightage.	Thus, the functional fabric of CPCB shall remain intact.				The committee discussed that CPCB is already taking appropriate action including closure direction against the industries found operating without pollution control measures.
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Comments Received from Various Expert Institutions on the Report on Environmental Compensation

As per the Hon'ble NGT suggestion, CPCB has invited comments of 3 expert institution, namely, Centre for Science and Environment (CSE), Institute of Economic Growth (IEG) and The Energy Research Institute (TERI). The CPCB in-house committee on Environmental Compensation has deliberated on the comments and finalized the report accordingly. The Committee's deliberations are summarized in table below:

S. No.	Item	Comments from TERI	Comments of CSE	Comments of IEG	Committee's Deliberations
1	Cases d, e and f	Distinction between categories "a, b, c" and "d, e, f" is not clear. Case specific investigations should be minimized. Proposed cases deals separately with intentional and accidental cases but sometimes they are not easy to establish.	-	Why cases 'e' and 'f' are left for later remediation and study?	There may be a varied damage to the environment as considered in cases 'e' and 'f'. Such damage assessment requires detailed case specific study and remediation measures. Therefore, whenever such case comes into the notice, Environmental Compensation may be levied based on the detailed investigation made by Expert Institutions/Organizations.
2	R-factor	-	R-factor should be Rs. 1,000/day.	Why R-factor is kept as 250, although the value ranges between 100 to 500?	In the Environmental Compensation policy, average value of the R-factor as 250 is recommended, keeping in view both its practicability as well as to make it significantly deterrent, which may be further revised in future.
3	L-factor	-	L-factor should be based on the population density of surroundings, instead of population of the nearby city/town. For critically polluted areas/ ecologically fragile areas LF should be considered as 2.	For nearby city, having population less than 1 million, the LF is 1. This implies that we care only for populated regions only. Industries located in critically polluted and ecologically fragile area should be closed down.	Population density for surrounding of industrial units will be complex because it will vary depending on area used in calculation of population density as industrial units are generally away from population. More weightage is given to the higher population exposure to the risk. In case the industry is located in the city of population less than one million than the LF Factor will be 1. Depending on the local environmental conditions, the restrictions on expansion and modernization of industries in critically polluted areas are imposed as per the prevailing policy of the Government of India. Similarly, industries in ecologically fragile areas are permitted after careful examination, as per prevailing policy of MoEFCC/SPCB, The Committee agreed that for notified ecologically fragile areas, LF may be considered as 2. However, LF for critically polluted areas may be explored in future.

S. No.	Item	Comments of CSE	Comments of IEG	Committee's Deliberations
4	S-factor	Classification of industries should be based on profit/turnover basis.	-	Presently industrial units are classified into small, medium and large category (MSME Act, 2006) based on the data of assets/infrastructure available with them. The data for profit/turnover of industrial units are not available with SPCBs/PCCs and S-factor based on profit/turnover will complicate the procedure for calculation of EC. This may be considered in future when SPCBs/PCCs will have such type of data.
5	Level of non-compliance	Pollution Index does not measure the level of pollution. Further, averaging PI eliminates the variation in the nature/ impact of pollution that PI tries to capture. Further, the Red Category itself is too wide and some sort of sub-classification should be undertaken The rate of the penalty should increase with the period of violation. The penalty should increase exponentially in case of repeated violations. The objective should be that units should choose to shut down operations when violations cannot be brought under control in the specified time.	-	Pollution Index (PI) itself covers the potential of environmental pollution as its calculation considers variation in pollution load. The industrial sectors have been categorized into Red, Orange and Green, based on their Pollution Index in the range of 60 to 100, 41 to 59 and 21 to 40, respectively. As PI is not available for all the industrial sectors, calculating PI for rest of the sectors will delay the processing. Therefore, for calculating the Environmental Compensation average PI as 80, 50 and 30 may be used for Red, Orange and Green category of industries, respectively. To keep the formula simple for better implementation, the IV factor may not be considered as there are different environmental parameters such as environmental standards and for each standard calculation of level of violation and its weightage will be a tedious task, which may bring difficulty in implementation of EC concept. The Committee has agreed that in order to include deterrent effect for repeated violations, EC may be increased on exponential basis, i.e. by 2, 4 and 8 times on each similar violation. Further, if the violator continues its operations beyond 3 months then EC may be increased by 2, 4 and 8 times for 2 nd , 3 rd and 4 th quarter, respectively. Besides EC, industry may be prosecuted or closure directions may be issued, whenever required.
6	Utilization of fund	Funds may be utilized for building monitoring and enforcement capacity of SPCBs and strengthening the pollution compliance especially in the MSME sector.	Incentives to regulators where no violations are observed and incentives to public for reporting violations may be provided.	EC is not a substitute for taking actions under EP Act, Water Act or Air Act. In fact, units found polluting should be closed/prosecuted as per the Acts. Scheme of infrastructure augmentation of Urban Local Bodies (ULBs) /capacity building of SPCBs/PCCs is already covered in the report Further, schemes such as incentives to regulators where no violations are observed and incentives to public for reporting violations may be considered separately.

S. No.	Item	Comments of CSE	Comments of IEG	Committee's Deliberations
7	GRAP	-	Size of the construction sites more than 20,000 sqm. area are considered for EC. Although, small sites cumulatively impact significantly. Illegal dumping of municipal solid waste regardless of the place should be penalized.	As per the EIA Notification, 2006, building construction projects more than 20,000 sqm. area are required to have environmental clearance, therefore, the same cut-off is maintained here. Issue of illegal dumping of municipal solid waste is being covered in separate report of EC.
8	Others: (a)	Severity of violations should be measured in terms of hours of violation because for some pollutants even a few hours of violation can have serious environmental and health consequences. This would require continuous monitoring of stacks, which is not the case presently for most units. Therefore, continuous monitoring should be implemented urgently, to begin with for all red and orange categories.	-	Currently, online continuous effluent/emission monitoring system (OCEMS) is installed in only in 17 categories of highly polluting industries and some other industrial sectors. Further, in current practice the compliance of industries is only verified by physical monitoring and compensation may be imposed based on the manual testing. The idea of measurement of violation on hourly basis may be considered in future, when OCEMS is widely installed and included in policy.
	(b)	CETP should be categorized under Red Category of industries. Some sub-classification should be undertaken under red categories of industries.	-	CETPs are already categorized under Red Category of Industries
	(c)	Based on the spirit behind the proposed charge, it should therefore be called an "environmental penalty" rather than "environmental compensation".	-	The power of imposing "Penalty" lies in the jurisdiction of the Hon'ble Courts and NGT only. The CPCB is empowered to levy environmental compensation by the Hon'ble NGT in its order dated 03.08.2018 (OA No.593/2017). Therefore, term "Environmental Penalty" is avoidable.

Item Nos. 01 & 02

Court No. 1

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHIOriginal Application No. 125/2017
(M.A. No. 1337/2018)

With

Original Application No. 217/2017
(M.A. Nos. 761/2017, 1073/2017,
1098/2017 & 1471/2017)Court on its own Motion
State of Karnataka
Versus
Applicant(s)
Respondent(s)

With

D. Kupendra Reddy
State of Karnataka
Versus
Applicant(s)
Respondent(s)

Date of hearing: 06.12.2018

**CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE S.P. WANGDI, JUDICIAL MEMBER
HON'BLE MR. JUSTICE K. RAMAKRISHNAN, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER**Original Application No. 125/2017
(M.A. No. 1337/2018)For Applicant(s): Mr. Sajan Poovayya, Sr. Advocate and Mr. Saransh Jain,
Advocate for impleaded applicant - Namma Bengaluru
Foundation
Mr. Vikram Hegde, Advocate for impleaded applicantFor Respondents (s): Mr. Devraj Ashok, Advocate
Mr. Rajkumar, Advocate and Ms. Sonia, LA
Ms. Nidhi Mehrotra, AdvocateOriginal Application No. 217/2017
(M.A. Nos. 761/2017, 1073/2017,
1098/2017 & 1471/2017)For Applicant(s): Ms. Guneet Khehar, Mr. Tarunvir Singh Khehar, Mr.
P. Ramaprakash and Mr. Sandeep Mishra, Advocates
For Respondents (s): Dr. Abhishek Atrey, Advocate
Mr. Rajkumar, Advocate and Ms. Sonia, LA**ORDER**

1. The issue for consideration in the two matters, one initiated by the Tribunal on its own motion and the other filed by an individual relates to contamination of water bodies at Bengaluru - Bellandur lake, Agara lake and Varthur lake *inter-alia*, on account of discharge of untreated sewage and other effluents from

their performance should be recorded and considered favourably or otherwise for their career progression.

xv. Similar exercise as (xiv) may be undertaken to identify officers responsible for failure in the past. Such exercise may be completed within three months from today.

xvi. Since failure of preventing the pollutants being discharged in water bodies (including lakes) and failure to implement solid and other waste management rules are too frequent and widespread, the CPCB must lay down specific guidelines to deal with the same, throughout India, including the scale of compensation to be recovered from different individuals/authorities, in addition to or as alternative to prosecution. The scale may have slabs, depending on extent of pollution caused, economic viability, etc. Deterrent effect for repeated wrongs may also be provided.

xvii. MoEF&CC may specify limit for phosphorus in soaps and detergents to prevent damage to the environment and public health.

27. The above amount in the present case has been determined having regard to the estimated cost of setting up of STPs, based on the data available, which has been assessed with the assistance of the learned Counsel for the parties.

28. We have nominated Justice Santosh Hegde on information being provided during the hearing that he is agreeable to undertake the above job.

29. Justice Hegde will be entitled to a token honorarium of Rs. 2.5 Lakh per month from the date he assumes the charge. Justice Hegde will be entitled to assistance of persons of his choice for which remuneration will be paid by the SPCB, Karnataka as may be determined by Justice Hegde.

Item Nos. 1 to 11

Court No. 1

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 176/2015
(M.A. No. 1332/2015)
&
Original Application No. 59/2012
(M.A. No. 34/2016 & M.A. No. 190/2016)
&
Original Application No. 108/2013
(M.A. No. 489/2015)
&
Original Application No. 179/2013
(M.A. No. 866/2014 & M.A. NO. 644/2015)
&
Appeal No. 67/2015
(M.A. No. 652/2015)
And

Original Application No. 484/2015
(M.A. No. 155/2017, M.A. No. 567/2017
& M.A. No. 927/2017)
And

Original Application No. 327/2018
(M. A. No. 1282/2018)
And

Original Application No. 115/2017
(M.A. No. 442/2017)
And

Original Application No. 411 of 2018
And

Original Application No. 613/2017
And

Original Application No. 614/2017

Shailesh Singh		Respondent(s)
	Versus	
Hotel Holiday Regency, Moradabad & Ors.		Applicant(s)
With		
Legal Aid, National Green Tribunal Bar Association		Applicant(s)
	Versus	
NCT of Delhi & Ors.		Respondent(s)
With		
Raj Hans Bansal		Applicant(s)
	Versus	
Ministry of Water Resources & Ors.		Respondent(s)
With		
Apex Chambers of Commerce and Industries of N.C.T. of Delhi & Ors.		Applicant(s)
	Versus	
Govt. of NCT Delhi & Ors.		Respondent(s)
With		
Vikrant Tongad		Applicant(s)

Versus

Union of India & Ors. Respondent(s)

With
Shailesh Singh Applicant(s)

Versus

Hotel The Oberoi Amarvilas & Ors. Respondent(s)

With
Shailesh Singh Applicant(s)

Versus

Panchsheel Buildtech Pvt. Ltd. & Ors. Respondent(s)

With
Shailesh Singh Applicant(s)

Versus

Central Ground Water Board & Ors. Respondent(s)

With
M/s A-One Mineral Water Industry Applicant(s)

Versus

Central Ground Water Authority & Ors. Respondent(s)

With
Mohd. Javed Asghar Applicant(s)

Versus

M/s Upper Ganges Sugar and Industries Ltd.
(Distillery Unit) & Ors. Respondent(s)With
Mohd. Javed Asghar Applicant(s)

Versus

State of U.P. & Ors. Respondent(s)

Hearing concluded on: 18.12.2018

Order uploaded on: 03.01.2019

CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE S.P. WANGDI, JUDICIAL MEMBER
HON'BLE MR. JUSTICE K. RAMAKRISHNAN, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER

For Applicant(s): Mr. Raj Pajwani, Senior Advocate and Mr. Rahul Choudhary, Advocate (In O.A. Nos. 59/2012 & 108/2013)
Ms. Preeti Singh, Mr. S. Porwal, Mr. Shivam Jaiswal, Advocates (In O.A. Nos. 176/2015, 484/2015, 327/2018 & 115/2017)
Mr. Amrendra Kumar Dubey, Advocate (O.A. No. 411/2018)

For Respondent (s): Ms. Sakshi Popli, Advocate for DJB (O.A. No. 59/2012)
Mr. Sumeet Pushkarna, Mr. Devanshu, Advocates with Mr. Sudhir Chauhan, E.E., Delhi Jal Board (O.A. No. 108/2013)
Mr. Ajay Jain, Advocate for GNCTD
Mr. Ardhendumauli Kumar Prasad, Mr. Shashank Saxena, Ms. Diksha Gera, Mr. Amrithesh Raj, Advocates for CGWA
Mr. Pradeep Mishra, Mr. Daleep Dhyani, Advocates for UPPCB
Ms. Sakshi Popli, Advocate for NDMC
Mr. Amit Tiwari, Mr. Rohit Pratap Singh, Advocates for State of UP

appropriate mechanism can be introduced consistent with the needs of environment.

29. The MoEF&CC is directed to constitute an Expert Committee by including representatives from IIT Delhi, IIT Roorkee, IIM Ahmedabad, CPCB, NITI Ayog and any other concerned agency or department to examine the issue of appropriate policy for conservation of ground water with a robust institutional mechanism for surveillance and monitoring with a view to enhance access to ground water for drinking purposes in OCS areas by way of appropriate replenishment practices which can be properly accounted and measured for as well as to sustain the floodplains of rivers in terms of e-flows and other water bodies. The MoEF & CC and MoWR may finalize the issue of subject remain *inter-se* with regard to ground water reserve and its quality.

30. The Committee may be constituted in two weeks and report of the Committee may be furnished to the MoEF &CC and this Tribunal in two months by e-mail at ngt.filing@gmail.com.

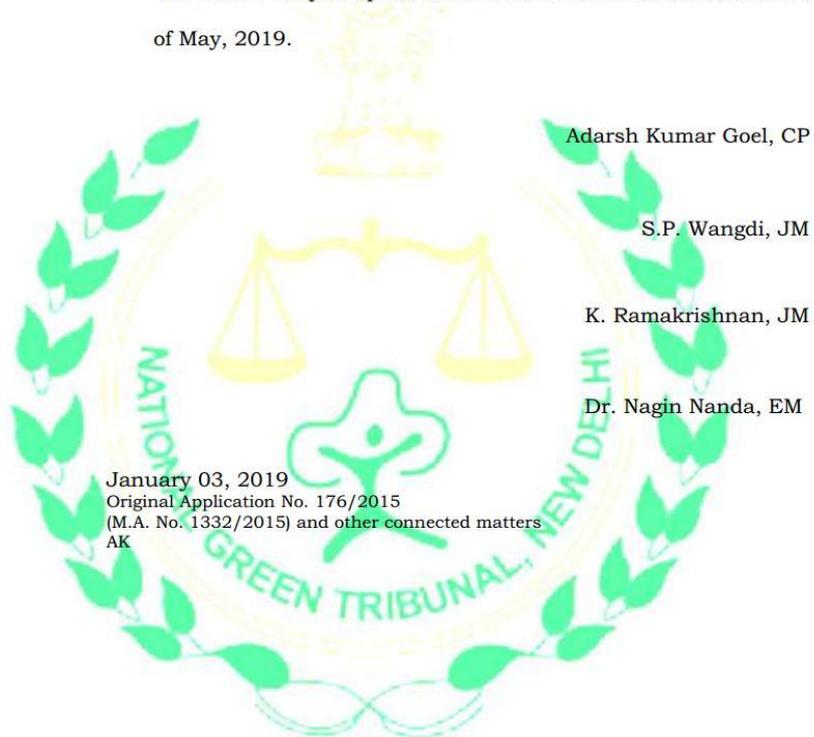
31. The Committee may also indicate the projection of its impact study in light of projected data for the next 50 years (in phased manner with action plan for each decade). Thereafter, fresh guidelines be issued by the concerned Ministry and the report furnished to the Tribunal on or before 30.04.2019.

32. The CPCB may constitute a mechanism to deal with individual cases of violations of norms, as existed prior to Notification of 12.12.2018, to determine the environment compensation to be recovered or other coercive measures to be taken, including prosecution, for past illegal extraction of ground water, as per

law. All the matters relating to illegal extraction of ground water by individuals are disposed of with these directions.

33. The Expert Committee report, the new policy and challenge to orders of authorities, if any, will be considered on the next date.

The matter be put up for above consideration in the first week of May, 2019.



CRITERIA TO CALCULATE WATER CONSUMPTION**Table 1: Discharge of 4" Dia and 1 HP Pump**

Sl. No.	Depth (Meter)	Discharge	
		LPM	m ³ /hr
1	25	50	3
2	43	40	2.4
3	59	30	1.8
4	69	20	1.2
5	77	10	0.6

Table 2: Discharge of 4" Dia and 2 HP Pump

Sl. No.	Depth (Meter)	Discharge	
		LPM	m ³ /hr
1	60	50	3
2	98	40	2.4
3	124	30	1.8
4	141	20	1.2
5	165	10	0.6

Table 3: Discharge of 6" Dia and 3 HP Pump

Sl. No.	Depth (Meter)	Discharge	
		LPM	m ³ /hr
1	17	200	12
2	29	175	10.5
3	41	150	9
4	50	130	7.8
5	62	100	6

Table 4: Discharge of 6" Dia and 5 HP Pump

Sl. No.	Depth (Meter)	Discharge	
		LPM	m ³ /hr
1	26	225	13.5
2	50	200	12
3	70	175	10.5
4	86	150	9
5	92	140	8.4

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8. CGWB. 2017. *Dynamic Ground Water Resources of India.* Faridabad-Central Ground Water Board, Ministry of Water Resources, River Development & Ganga Rejuvenation, Government of India.
9. CPHEEO. 2013. *Manual on Sewerage and Sewage Treatment Systems – 2013, New Delhi: Ministry of Urban Development, Government of India.*
10. CPHEEO. 2016. *Manual on Municipal Solid Waste Management – 2016. New Delhi: Ministry of Urban Development, Government of India.*
11. Ministry of Micro, Small and Medium Enterprises. 2006. *The Micro, Small and Medium Enterprises Development Act, 2006. 2nd October, 2006, vide notification No. S.O. 1154(E) dated 18th July, 2006, see Gazette of India, Extraordinary Part II sec.3(ii), Government of India.*
12. *Plastic Waste Management Rules, 2016.* (G.S.R. 320 (E) [18-03-2016]). New Delhi: Ministry of Environment Forest and Climate Change, Government of India.
13. *Solid Waste Management Rules, 2016.* (S.O. 1357(E) [08-04-2016]). New Delhi: Ministry of Environment Forest and Climate Change, Government of India.
14. WILO. 2017. *Building Service Residential Selection Booklet.* Pune- WILO Mather and Platt Pumps Pvt. Ltd.

**DETOX INDIA**operated by  **VEOLIA**

GPCB ID: 32798

Ref. No: DIPL/CORR/SITE/2024/95

Date: 16/12/2024

To,
The Unit Head,
Gujarat Pollution Control Board,
Paryavaran Bhavan, Sector 10-A
Gandhinagar - 382 010

KA: Shri Arun G. Patel

- Ref.: 1. Closure direction letter No. GPCB/ANK/CCA-1360(13)/ID-32798/828631 dated 05/12/2024
2. IEC ID 1800841, dated: 05/12/2024 (*payment link of EDC w.r.t. above letter*)

Sub.: Intimation for assessment of EDC

Respected Sir,

This has reference to the above reference and subject matter, compliance has been started as directed vide above closure order. The electricity has been disconnected and a BG of Rs. 10,00,000 (ten lakhs only) has been prepared.

As directed in point no. 14 & 16 for the assessment of EDC, we have engaged SVNIT, Surat to assess the EDC. The Institute has reviewed our request and informed us that the said task will take 3 months time. The PO and the letter of SVNIT are attached as **Annexure-1 & Annexure-2** respectively for your ready reference.

We undertake that the required EDC will be paid upon receipt of assessment report from SVNIT, Surat.

In addition to the above point(s), we will submit a consolidated compliance status at the time of requesting the Revocation Order.

We humbly request you to take cognizance of our submission.

Thanking you,

Yours Faithfully,
For, **Detox India Private Limited**


Authorised Signatory

Encl: As stated

Cc: The Regional Officer, Gujarat Pollution Control Board, Ankleshwar.**Detox India Private Limited**

(Formerly : Ankleshwar Cleaner Process Technology Centre Pvt. Ltd.)

Site : Plot No. : 7921, 7922, 7923, G.I.D.C. Ankleshwar, Dist. : Bharuch-393002 (Guj.) INDIA

Registered office: 501, 5th Fl. Detox House, H.No 2/819 To 823 Hira Modi Ni Seri, Ring Road, Sagrampura, Surat- 395002, Gujarat

Ph. : 9824103434 | Email: info@detoxindia.com | CIN U90000GJ2010PTC060122

Annexure-1
PO copy

WORK ORDER



Consultancy Charges for EDC calculations.

Supplier Code : 32001398	Supplier Name : SARDAR VALLABHBHAI NATIONAL INSTITU	Address : CIVIL ENGINEERING DEPARTMENT,, SVNIT CAMPUS	City : Surat	Pin Code : 395007	GST Number : 24AAAJS1184P1ZP	PAN Number : AAAJS1184F	Contact Person : PROF. (DR.) SATYAJIT PATEL	Contact No. : 9714740022	Email ID : spatel@amd.svni.ac.in	WO No. : 4900006023	Date : Dec 13, 2024	Currency : INR	Purchasing Group : P05	Plant / Project Name & No. : 3002 / DIPL - Ankleshwar	PR Number : 1500006709	PR Date : 14.12.2024
Invoice Address : Detox India Pvt. Ltd.										Delivery Address : Detox India Pvt. Ltd.						
Address : Plot No. 7921-7923, GIDC Ankleshwar Tal. Ankleshwar										Address : Plot No. 7921-7923, GIDC Ankleshwar Tal. Ankleshwar						
City : Dist. Bharuch										City : Dist. Bharuch						
Pin Code : 393002										Pin Code : 393002						
GST Number : 24AAICA8402F170										Contact Person : Ankleshwar stores						
PAN Number : AAICA8402F										Contact No. : 02646350854						
Quotation Number : EMAIL										Quotation Date : 11.12.2024						
For calculation of the final amount of Environmental Damage Compensation to be done as per the CPCB guidelines.																
S.No	Material/Service No.	Description	HSN/SAC	UOM	Qty	Unit Rate	Total Amount	Tax Type	Tax Rate	Tax Value						
1		Consultancy Charges for EDC calculation	998393	AU	1.000	10,00,000.00	10,00,000.00	CGST SGST	9.00% 9.00%	90000.00 90000.00						
SCOPE OF WORK: 1) The methodology for the calculation of the final amount of Environmental Damage Compensation will be done as per the CPCB guidelines. 2) Necessary site visit(s) shall be made by the experts from SVNIT, Surat. 3) Necessary C.C.A. data, details and drawings (soft + hard copies) shall be submitted by the industry, as and when required by the SVNIT experts. 4) Report preparation. 5) One free visit included in the scope																
1.1	1200214	Legal consultancy charges	998393	EA	1.000	10,00,000.00	10,00,000.00									
Scope of Work & Other Commercial Details shall be the same as per the Reference offer & Communications email Dated on: 11.12.2024 Other Conditions to be followed as per below 1) Timeline for Report Submission: 2 months from Work order 2) If Delay is attributed by SVNIT From mentioned date then Penalty shall be effective as 2.5%/week delay of Total basic order value & it shall be cumulative Upto max 10%/Week delay of Total basic order value. However, if there is a delay from DIPL side then SVNIT shall be granted an extension in the penalty applicability date Upto number of days delayed from the DIPL side. 3) Extra Per day site visit charges - Rs. 25,000 + GST@18%. 4) Laboratory (sample) analysis charges shall be extra and as per the Govt of Gujarat Gazette. Actual invoice will be generated by SVNIT, Surat. Necessary sampling and analysis invoice will be generated by the SVNIT, with payment within a week of the invoice. 5) All the logistic arrangements (transportation + accommodation) during the visit shall be taken care of by M/s Detox India Pvt. Ltd											Sub Total		10,00,000.00			
											Less Discount		0.00			
											Packing & Forwarding		0.00			
											Freight		0.00			
											Compensation cess		0.00			
											Net Amount		10,00,000.00			
											Total CGST		90,000.00			
											Total SGST		90,000.00			
											Total IGST		0.00			
											Total TCS value		0.00			
Total value in Words : Eleven Lakh Eighty Thousand Rupees Only											Total PO value		11,80,000.00			
GENERAL CONDITIONS OF CONTRACT (GCC) - AS ATTACHED																
SPECIAL CONDITIONS OF CONTRACT (SCC)																
Price Basis		DAP-Ankleshwar plant														
Packing / Freight / Insurance		To & Fro Vehicle for Transportation in DIPL. Scope														
Payment Terms		As mentioned below 50% advance against WO and balance 50% before submission of final signed report.														

WO No :4900006023

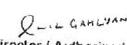
Page 1 of 2



WORK ORDER


DETOX INDIA
operated by VEOLIA

Consultancy Charges for EDC calculations.

Completion Period	31.03.2025	
Bank Guarantee	NA	
Warranty / Guarantee	NA	
Validity of Work Order	The DIPL team will evaluate the job. Should there be any discrepancies or fault, vendor is required to rectify the same.	
Erection & Commissioning	In vendor's scope	
Important Note	Tax Invoice / Challan raised by Contractor must contain WO No. and GST No. Invoice will not be processed in absence of these details. Original Invoice must be sent at site.	
Other Conditions	All disputes shall be settled under the jurisdiction of Surat.	
PR Requested By : Kesha Dodiya	WO Prepared By : REVATHI NARAYANAN	Approved By : Anil Gahlyan
		Detox India Pvt. Ltd.  Director / Authorized signatory
Detox India Pvt. Ltd. Corporate Office Address Detox House, Opp. Gujarat Samachar Press Udhna Dharwaja Ring road, SURAT - 395002 GUJ. INDIA CIN:-U90000GJ2010PTC060122		
		Tel.: +91 261 - 2351248/2346181 Email : procurement@detoxindia.com



Annexure-2
Letter of SVNIT



सरदार वल्लभभाई राष्ट्रीय प्रौद्योगिकी संस्थान, सुरत
SARDAR VALLABHBHAI NATIONAL INSTITUTE OF TECHNOLOGY, SURAT
सरदार वल्लभभाई राष्ट्रीय प्रौद्योगिकी संस्था, सुरत
(An Institute of National Importance. Established under NITSER Act by Ministry of Education, Govt. of India)

SVNIT

DoCE/Env Consultancy/BNT/DeTox/C-345/2024

Date: 16/12/2024

To,

(Ms.) Bhumika Jariwala
 Manager - Strategic Projects and Contracts
 Detox India Pvt. Ltd.
 Detox House, Opp. Gujarat Samachar Press,
 Udhna Darwaja, Ring Road,
 Surat - 395002,
 Gujarat, India.

SUB: Environmental Damage Compensation certification.

REF: i) Your e-mail dated 10/12/2024.
 ii) This office quotation via e-mail dated 11/12/2024.
 iii) Your Work Order No - WO # 490006023 dated 13/12/2024.

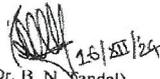
Dear Sir / Madam,

Thanks for the trust and the Work Order in favour of S. V. National Institute of Technology, Surat. In continuation to this office e-mail under reference (2), this is to inform you that the tentative time (duration) required for the completion of the work is three months.

Other terms and conditions of the quotation remain unchanged.

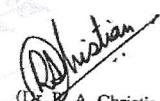
Thanking you in anticipation.

Yours faithfully,



(Dr. B. N. Gandel)
 Associate Professor,
 Department of Civil Engineering
 SVNIT, Surat

Cell: +91-98255 53175
 E-mail: bnt@ccd.svnit.ac.in



(Dr. A. Christian)
 Professor & Head,
 Department of Civil Engineering
 SVNIT, Surat



इच्छानाथ, सुरत - 395007, गुजरात, भारत, दूरभाष: (का) 91-0261-2259571, 2259582-84 वेबसाइट: <https://www.svnit.ac.in>
 Ichchhanath, Surat-395007, Gujarat, India. Phone: (O) 91-0261-2259571, 2259582-84 Website: <https://www.svnit.ac.in>



Annexure - 3

Revised and Updated Time bound action plan for remaining activities w.r.t. Closure order and Revocation application

SN	Action plan point	Target Date/ Days/ Months	Status	Remarks
1	Disposal of wastewater filled in the SD feed tank no. 1	15 days	The present status of the wastewater is as it is.	We will empty out remaining material and store it safely in a dedicated AG tank 3425 after getting clearances from all the departments including DISH, Police, GPCB, Revenue, etc. We will dispose/ treat it with required safety precautions under intimation to the Board.
2	Repair/ replace the top roof of the SD feed tank no. 1	3 months	The present status is as it is.	We will repair/ replace the top roof of the SD feed tank no. 1 after getting clearances from all the departments including DISH, Police, GPCB, Revenue, etc.
3	Repair/ replace the top roof of the SD feed tank no. 2	3 months	The present status is as it is.	Firstly, we will repair/ replace the top roof of the SD feed tank no. 1 after completion of the necessary formalities by the Board. It will take ~3 months from the clearances of all the departments including DISH, Police, GPCB, Revenue, etc. Next, we will repair/ replace the top roof of the SD feed tank no. 2 that will take a further 3 months.
4	Installation of Breather Valve in SD tank no. 1	3 months	Presently the tank no. 1 is not under operation.	It will be installed along with Roof repair/ Replacement work. Refer Point no. 2
5	Installation of Breather valve in SD tank no. 2	3 months	The said SD tank no. 2 was provisioned with following facilities as an pro-active measure: 1. Vent - 2 Inch 2. Over flow line - 4 Inch, 3. Tank Level Transmeter- Board & Float type,	It will be installed along with Roof repair/ Replacement work. Refer Point no. 3



SN	Action plan point	Target Date/ Days/ Months	Status	Remarks
			4. Dyke wall- Volume- 89.49 KL 5. All Connected pipe lines are above ground. 6. Stand by transfer pumps.	
6	Separate stripping system for Spray dryer plants.	6 months	The present status is as it is.	We will provide a dedicated stripping system for the spray dryer plant from one of our MEE as per GPCB guidelines. The new piping installation and modification work is expected to be completed within 6 months from the date of revocation order.
7	External Site Safety Audit Report as per IS 14489:20	15th Jan'25	Safety Audit report submitted to the board with Ref No. DIPL/CORR/SITE/2025/13 on dated 16.01.2025.	Compliance in process. The Safety Audit recommendation's separate time bound action plan is submitted to the Board with Ref No. DIPL/CORR/SITE/2025/18 dated 29/01/25.
8	HAZOP Study report of the SD process.	15th Jan'25	HAZOP Audit report submitted to the board with Ref No. DIPL/CORR/SITE/2025/13 on dated 16.01.2025.	Compliance in process. The HAZOP recommendation's separate time bound action plan is submitted to the Board with Ref No. DIPL/CORR/SITE/2025/18 dated 29/01/25.
9	Root cause analysis study	15th Jan'25	PO no. 4900006025 is issued and multiple site visits for study are done.	The accident investigation report submitted to the Board with Ref No. DIPL/CORR/SITE/2025/18 dated 31.01.2025.
10	Removing all remaining in-process material/ intermediate materials considering requisite process safety aspects	15 days	The present status of the remaining in-process material/ intermediate materials is as it is. We have taken the samples from the SD tank no. 1 for the analysis purpose on the	We will empty out remaining material and store it safely in a dedicated tank after getting clearances from all the departments including DISH, Police, GPCB, Revenue, etc. We will dispose/ treat it with required safety precautions



SN	Action plan point	Target Date/ Days/ Months	Status	Remarks
			same date & sent to a 3rd party laboratory.	under intimation to the Board.
11	Safely collection of residues of chemicals/ hazardous & other wastes generated from the accident and dispose of the same as per provisions environmental acts under intimation to the board.	2 months	During the incident there was no generation of w/w, solid waste. Only the scrap that is MS plate (roof of the tank) was broken. The present status is "removed/ discarded the scrap from the incident location and shifted at the scrap yard"	We will discard the generated MS scrap roof and railing of the tank.
12	Assessment of Environment Damage Compensation through institutes of National repute like NEERI/IIT to decide final EDC. The EDC amount calculated based on scientific assessment may be considered final.	3 months	We have engaged SVNIT, Surat to assess the EDC. The Institute has reviewed our request and informed us that the said task will take 3 months time. The PO and the letter of SVNIT has been intimated to the Board vide our letter no. DIPL/CORR/SITE/2024/ 95 dated 16/12/2024. SVNIT, Surat has commenced their work and the experts made their first visit on 28/12/2024.	We have paid EDC and the same has been informed to the Board vide our letter ref. No.: DIPL/CORR/SITE/2025/03, dated 03/01/2025. If the amount calculated by SVNIT Surat comes lesser than Rs. 1,00,00,000, we request the Board to adjust/ return the balance amount in a befitting manner.
13	SD tank no. 1 vent connection with scrubber of MEE plant - 1.	3 months	Presently the tank no. 1 is not under operation.	It will be connected along with will repair/ replace the top roof of the SD feed tank no. 1 after getting clearances from all the departments including DISH, Police, GPCB, Revenue, etc. Refer point no. 2
14	SD tank no. 2 vent connection with scrubber of MEE plant - 1	3 months	The said SD tank no. 2 was provisioned with following facilities as an pro-active measure:	It will be installed along with Roof repair/ Replacement of tank roof work. Refer Point No. 3



SN	Action plan point	Target Date/ Days/ Months	Status	Remarks
			<ol style="list-style-type: none"> 1. Vent - 2 Inch 2. Over flow line - 4 Inch, 3. Tank Level Transmeter- Board & Float type, 4. Dyke wall- Volume- 89.49 KL 5. All Connected pipe lines are above ground. 6. Stand by transfer pumps. <p>As roof cover is eroded in nature we will connect the vent along with roof repair/ replacement.</p>	





GUJARAT POLLUTION CONTROL BOARD

Regional Office - 5009/4, GIDC Estate, Ankleshwar - 393 002. Dist. Bharuch (Gujarat)
Ph. No. : (02646) 222 933 E-mail Id : ro-gpcb-ankl@gujarat.gov.in

ANNEXURE -R6

તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

નંબર : 32798

તારીખ : 03/12/2024

પાણી અધિનિયમ 1974ની કલમ-23, હવા અધિનિયમ 1981ની કલમ-24 અને પર્યાવરણ (સુરક્ષા) અધિનિયમ - 1986ની કલમ-10 હેઠળ અમોને મળેલ સત્તાની રૂએ અમો નીચે સહી કરનાર અમોને જરૂરી લાગે તેની સહાય લઈને તમામ સમયે નીચેના હેતુઓ માટે આપની જગ્યામાં દાખલ થવાનો અને તપાસ કરવાનો અધિકાર ધરાવીએ છીએ.

- (1) અમોને સોંપેલા રાજ્ય બોર્ડ/કેન્દ્ર સરકારનાં કાર્ય બજાવવાના હેતુ માટે,
- (2) આવા કોઈ કાર્યો બજાવવાના છે કે કેમ અને તેમ હોય તો કઈ રીતે તે બજાવવાના છે અથવા આ અધિનિયમ અથવા તે હેઠળ કરેલા નિયમોની અથવા આ અધિનિયમ હેઠળ બજાવેલી કોઈ નોટીસની, કરેલા કોઈ હુકમની, આદેશની અથવા આપેલા કોઈ અધિકારપત્રની કોઈ જોગવાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે,
- (3) કોઈ સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુની તપાસ કરવા અને તેની કસોટી કરવાના હેતુ માટે અથવા જે જગ્યામાં તેને એમ માનવાને કારણ હોય કે આ કાયદા કે તે હેઠળ કરેલા નિયમો મુજબ કોઈ ગુનો કરવામાં આવ્યો છે, અથવા થવાની તૈયારીમાં છે, તેવી કોઈ જગ્યાની ઝડતી લેવા માટે અને તેને એમ માનવાને કારણ હોય કે આ કાયદા કે તે હેઠળ કરેલ નિયમો હેઠળ શિક્ષાપાત્ર કોઈ ગુનો કર્યાનો પુરાવો, તેવા સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુ કબજે લેવા માટે અમે નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ/કારખાનામાં દાખલ થવાનો સમય : સવારના/સાંજના 14:30 વા. 03/12/2024

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે.

has

1. R. J. Acharya - AEE
2. /
- 3.

પ્રતિ,

M/s. Detox India Pvt Ltd,

DIT No:- 7921-22-23

GTINOC- Ankleshwar

Dist- Bharuch

નકલ મળેલ છે.

આ સૂચના (નોટીસ) મેળવનારની સહી :-

સહી :-

અધિકારીનું નામ :- R. B. Makvana

હોદ્દો :- S.O

(Mr. Dharmendra Chotami)
A.M.

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ



સરનામું: પ્લોટ નં: ૫૦૦૯/૪, જીઆઈડીસી અંકલેશ્વર - ૩૬૩ ૦૦૨, જી.ભરૂચ

ફોન: (૦૨૬૪૬)૨૨૨૯૩૩, Website <http://gpcb.xgn.gujarat.gov.in>

Email ID (Regional officer) - ro-gpcb-ankl@gujarat.gov.in, (Unit head) uh-gpcb-ankl@gujarat.gov.in

સ્થળ તપાસની નિરિક્ષણ નોંધ

આઈ.ડી.નં: ૩૨૧૭૪ કેટેગરી/સ્કેલ: ...R./...L..., Latitude/ Longitude 21.62253/ 73.04619

શ્રીમાન,

આપશ્રીને જણાવવાનું કે. આજ તા. ૦૩/૧૨/૨૦૧૫ના રોજ આપશ્રી ના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઇન્સ્પેક્શન કરેલ છે જે દરમ્યાન હવા/પાણી/જોખમી કચરા/.....ના...../...../...../.....નમુના પૃથક્કરણ અર્થે એકત્રીત કરેલ છે.

આપશ્રીના એકમની મુલાકાત દરમ્યાન પર્યાવરણીય કાયદાઓના સંદર્ભે ત્રુટીઓ/ક્ષતિઓ જોવા/જાણવા મળેલ છે જે આધારે પડતર અરજી સંદર્ભે નિર્ણય લેતા પહેલા અને/અથવા કાયદાકીય પગલાં લેતા અને/અથવા પર્યાવરણ નુકશાન વળતર લેતા પહેલા કુદરતી ન્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખિતમાં સ્થળસ્થિતિ/મુદાઓ/સુચનાઓ આપવામાં આવે છે.

આ પરત્વે આપશ્રી નીચે લેખિતમાં રજૂઆત કરી શકો છો અથવા લેખિત ખુલાસો/સ્પષ્ટતા/પુર્તતા અહેવાલ કામકાજના દિન-૦૩ માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખિત માં અથવા XGN પર અથવા Email થી રજૂ કરવા નોટીસ આપવામાં આવે છે.

સ્થળ તપાસ દરમ્યાન જોવા મળેલ સ્થળસ્થિતિ/ત્રુટીઓ/ક્ષતિઓ/ખામીઓ:

- ① એન્ટીબાયોટિક આપના એકમની મુલાકાત એકમની અંદર એન્ટીબાયોટિક ના સંદર્ભમાં લેવામાં આવેલ.
- ② મુલાકાત સમયે મળેલ માટીની એન્ટીબાયોટિક આપના એકમની Spray Dryer Control room ની બાજુ ની અંદર ૩૦ Feed Effluent tank (75KLD; 1No) ની ~~અંદર~~ ડેંકની ઉપરની તરફ વેલ્ડિંગ થી કાન વાળું ડ્રુડ ની સમયે કોઈક કારણો સર ડેંક ની બાજુ અંદર એક તો ઉપરનો માગ ^{સર} ડેંક ની બાજુ ની પડેલ. મુલાકાત સમયે મળેલ માટીની એન્ટીબાયોટિક સર ડેંક પર કાર્પ કલા આર કામદારોનું મૂલ્ય અપેક્ષા છે. આમ ઉપરોક્ત મુદ્દાની દરમ્યાન ચુકાતો કરવા; આ દરમ્યાન ક્યા કારણો સર બને તેનો Root cause analysis તંત્ર આપી દરમ્યાન બીજા વાસ્તુ તંત્ર action plan આધાર સર રજૂ કરવા.
- ③ ઉપરોક્ત મુદ્દા મૂલ્ય પાતેલ કામદારોની વિગતો P.M રીપોર્ટ સહી રજૂ કરવી.
- ④ મુલાકાત સમયે સર ડેંક ની અંદર માટીની માગમાં (50L) effluent ની તરેલ ભેલા મળેલ તેનો એક નમુનો પૂરવકા કરાઈ વિગત લેવા સર effluent ની વિખાનું સર નિકાલ કરી ગણા કરવી. (પાછળ)

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ



સરનામું: પ્લોટ નં: ૫૦૦૯/૪, જીઆઈડીસી અંકલેસ્વર - ૩૯૩ ૦૦૨, જ.ભરૂચ

ફોન: (૦૨૬૪૬)૨૨૨૯૩૩, Website <http://gpcbxgn.gujarat.gov.in>

Email ID (Regional officer) - ro-gpcb-ankl@gujarat.gov.in, (Unit head) uh-gpcb-ankl@gujarat.gov.in

- ⑤ ઉપરોક્ત ગુણની ઇલાજાતિ તિલકલ ઉદ્યમલ waste water; Solid waste & other waste/Scrap ની પુરાની રજી કરવિ તેમજ તેનો ડીપોઝિટીશન ડીપોઝિટીશન રજી કરવિ.
- ⑥ ડીઝનલ પુરાની નીચે PLI Policy; DSH approval with map; schedule-7 details; PESO approval; onsite emergency plan; Fire & safety approvals / provisions પુરાની પુરાની રજી કરવિ.
- ⑦ ઉપરોક્ત ગુણની ડીઝનલ DSH રીપોર્ટ ડીપોઝિટીશન રજી કરવિ. Form-11; Form-21;
- ⑧ ડીપોઝિટીશન રજી ડીપોઝિટીશન માર્ગની effluent received; treated; Reused; Re Permeate Reject/Dispatch; effluent Reject; Effluent received for SDR MEE; chemical consumption; Haz-waste stock; Disposal પુરાની રજી કરવિ. રજી કરવિ તેમજ તેનો ડીપોઝિટીશન રજી કરવિ with manifest details.

ગુ.પ્ર.નિ.બોર્ડના નામે અને વતી, (R. J. Acharya) (R. B. Makwana)
 (અધિકારીઓના નામ, હોદ્દો, સહી): AEE S.O

મુલાકાત લેવામાં આવેલ હોય તે એકમના પ્રતિનિધીની રજુઆત: (જે લાગુ પડે તેની સામે જ સહી કરવી)

મુલાકાત દરમિયાન અધિકારીશ્રીઓએ.....મુદાઓ માટે સ્થળસ્થિતિ/સુચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે જેમા,

(૧) આ સ્થળસ્થિતિ/સુચનાઓ સાથે હું નીચે સહી કરનાર સંપૂર્ણ સહમત છું.

(૨) જેમા દર્શાવેલ સ્થળસ્થિતિ/સુચનાઓમાંથી મુદા નં.....સાથે હું નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજુઆત છે.

એકમના પ્રતિનિધી/આ નોંધ મેળવનાર નું નામ, હોદ્દો અને સહી:

તા. : 03/12/2024. (Mr. Dharmendra Chotram) Crm.

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ



સરનામું: પ્લોટ નં: ૫૦૦૯/૪, જીઆઈડીસી અંકલેશ્વર - ૩૯૩ ૦૦૨, જી.ભરૂચ

ફોન: (૦૨૬૪૬) ૨૨૨૯૩૩, Website <http://gpcb.xgn.gujarat.gov.in>

Email ID (Regional officer) - ro-gpcb-ankl@gujarat.gov.in, (Unit head) uh-gpcb-ankl@gujarat.gov.in

સ્થળ તપાસની નિરિક્ષણ નોંધ

આઈ.ડી.નં: ૩૨૧૧૬૬૬૬૬૬૬૬/સ્કેલ: ...R./...L..., Latitude/ Longitude... ૨૧.૬૨૨૫૩/ ૭૩.૦૪૬૧૭

શ્રીમાન,

આપશ્રીને જણાવવાનું કે. આજ તા. ૦૩/૧૨/૨૦૧૯ ના રોજ આપશ્રી ના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઈન્સ્પેક્શન કરેલ છે જે દરમ્યાન હવા/પાણી/જોખમી કચરા/.....ના...../...../.....નમુના પૃથક્કરણ અર્થે એકત્રીત કરેલ છે.

આપશ્રીના એકમની મુલાકાત દરમ્યાન પર્યાવરણીય કાયદાઓના સંદર્ભે ત્રુટીઓ/ક્ષતિઓ જોવા/જાણવા મળેલ છે જે આધારે પડતર અરજી સંદર્ભે નિર્ણય લેતા પહેલા અને/અથવા કાયદાકીય પગલાં લેતા અને/અથવા પર્યાવરણ નુકશાન વળતર લેતા પહેલા કુદરતી જ્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખિતમાં સ્થળસ્થિતિ/મુદાઓ/સુચનાઓ આપવામાં આવે છે.

આ પરત્વે આપશ્રી નીચે લેખિતમાં રજુઆત કરી શકો છો અથવા લેખિત ખુલાસો/સ્પષ્ટતા/પુર્વતા અહેવાલ કામકાજના દિન-૦૩ માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખિત માં અથવા XGN પર અથવા Email થી રજુ કરવા નોટીસ આપવામાં આવે છે.

સ્થળ તપાસ દરમ્યાન જોવા મળેલ સ્થળસ્થિતિ/ત્રુટીઓ/ક્ષતિઓ/ખામીઓ:

9) મુલાકાત સમયે SD Feed tank no-2 નું TOP Gucon Corroded & damaged હોવાને કારણે તે બાબતે સરકારી સુધારાકામક પગલાં લેવાઈને કારણે સર નામની રજુ કરામ.

10) જાણવા રૂકા SD Feed Storage tanks માં GPCB guidelines for Common Spray dryer અને Breather valve & condensers નો સુધારા કરવા બાબતે નોંધ લેવાઈને SD Feed effluent માટે guideline મુજબ stripping facility સેપરેટ ગણી રાખી SD feed effluent નું stripping કરવાની સુવિધા બનાવી આ બાબતે GPCB ની સામી જાણવા સુધારા કરવા માટે નોંધ લેવાઈને SD Feed Storage tanks માં GPCB guidelines મુજબ સામી facility બનાવી કારણે સર નામની રજુ કરામ.

ગુજરાત પ્રદૂષણ 440 અંતરા બોર્ડ

સરનામું: પ્લોટ નં: ૫૦૦૯/૪, જીઆઈડીસી અંકલેશ્વર - ૩૯૩ ૦૦૨, જી.ભરૂચ

ફોન: (૦૨૬૪૬)૨૨૨૯૩૩, Website <http://gpcbagn.gujarat.gov.in>

Email ID (Regional officer) - ro-gpcb-ankl@gujarat.gov.in, (Unit head) uh-gpcb-ankl@gujarat.gov.in



ગુ.પ્ર.નિ.બોર્ડના નામે અને વતી,
(અધિકારીઓના નામ, હોદ્દો, સહી):

(R. J. Acharya)
AEE

(R. B. Makwana)
S.O

મુલાકાત લેવામાં આવેલ હોય તે એકમના પ્રતિનિધીની રજુઆત: (જે લાગુ પડે તેની સામે જ સહી કરવી)

મુલાકાત દરમિયાન અધિકારીશ્રીઓએ.....¹⁰.....મુદાઓ માટે સ્થળસ્થિતિ/સુચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે જેમા,

(૧) આ સ્થળસ્થિતિ/સુચનાઓ સાથે હું નીચે સહી કરનાર સંપૂર્ણ સહમત છું.

સી

(૨) જેમા દર્શાવેલ સ્થળસ્થિતિ/સુચનાઓમાંથી મુદા નં.....સાથે હું નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજુઆત છે.

એકમના પ્રતિનિધી/આ નોંધ મેળવનાર નું નામ, હોદ્દો અને સહી:

Mr.

તા. : 03 / 12 / 2024.

(Mr. Dharmendu Chotnani)



Notice of Entry for Inspection (Notice)

ANNEXURE – R7

Number: 32798

Date : 03/12/2024

In pursuance of the powers vested in us under Section-23 of the Water Act 1974, Section-24 of the Air Act 1981 and Section-10 of the Environment (Safety) Act - 1986, we the undersigned have the right to enter and inspect your premises at all times for the following purposes with such assistance as we deem necessary.

- [1] For the purpose of carrying out State Board/Central Government functions assigned to us,
- [2] Whether any such functions are to be performed and, if so, in what manner they are to be performed or this Act or the rules made thereunder or any notice issued under this Act, For the purpose of ascertaining whether any provision of the Act or the rules made thereunder or of any notice issued, order made, order made or any authority issued under this Act is being complied with or has been complied with,
- [3] For the purpose of examining and testing any equipment, industrial plant, record, register, document or any other thing of importance or to search any place where he has reason to believe that an offense under this Act or the rules made thereunder has been committed, or is about to be committed, and where he has reason to believe that there is evidence of the commission of any offense punishable under this Act or the rules made thereunder, such equipment, industrial plant, record, register, document or We enter at the time mentioned below to take possession of any other important item.

Industry/Factory Entry Timings: ~~Morning~~/Evening: 14:30 Hrs

Date: 03/12/2024

We also have the following officers to assist us.

(1) R. J. Acharya- AEE

To,

M/s. Detox India Private Limited

Plot No:7921-22-23,

GIDC Ankleshwar,

Dist- Bharuch.

Sign:

Name of Officer: R. B. Makvana

Designation: SO

Received Copy:

Signature of Notice receiver:

(Mr. Dharmendra Chothani)

GM



Observation note of site investigation

ID No. 32789, Category/ Scale: R/ L, Latitude/ Longitude: 21.62253/ 73.04819

Mr,

It is to inform you that, your unit is inspected today dated: 03/12/2024 and during which air/water/hazardous waste/...-..... of...-../....01../-...../...-... samples have been collected for analysis.

During the visit to your unit, errors/defects in respect of environmental laws have been noticed/known on the basis of which the position/issues/suggestions are given in writing herewith for the purpose of providing you an opportunity to be heard as per the principle of natural justice before taking a decision in respect of the pending application and/or taking legal action and/or taking environmental damage compensation.

In this regard, you can make a written submission below or a notice is given to submit a written explanation/clarification/completion report to the Board's head office, Gandhinagar and at this office in writing or through XGN or by email within 03 working days.

Site situation//Flaws/Defects found at the time of inspection:

1. Your unit is visited today with reference to accident in the unit.
2. As per the information received at the time of visit, welding work was being done in the SD feed effluent tank (75 KL, 1 no) next to the Spray Dryer control room in your unit, due to some reason, blast occurred in the tank and its upper part was broken and fell to the side. As per the information received, four workers working on the said tank has been died. Hence you are required to explain the reason of incident along with the root cause analysis. Also submit an action plan to prevent reoccurrence of the incident with supporting evidences.
3. Submit the details of deceased workers along with their PM report.
4. At the time of visit, said tank was found to have about half amount (50%) of effluent and from that tank one sample is collected for analysis and you are required to dispose the effluent as per rules and inform accordingly.



GUJARAT POLLUTION CONTROL BOARD

REGIONAL OFFICE - 5009/4, G.I.D.C. Estate, Ankleshwar - 393 002. Dist. Bharuch. (Gujarat)

Phone No. : (02646) 222933, E-Mail : ro-gpcb-ankl@gujarat.gov.in

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5. To submit the details of wastewater, solid waste & other waste/scrap generated from the above incident and you are required to dispose it off as per the rules and submit the details thereof.
6. Submit PLI policy, DISH approval with map, Schedule-7 details, PESO approval, onsite emergency plan, fire & safety approvals/provisions etc.
7. Submit Action taken by DISH in the afore mentioned incident and submit DISH compliance report, form-11, form-21, etc.
8. At the time of inspection, you have not submitted details of last three months effluent reception, treated & reused along with RO permeate, reuse/dispatch, effluent rejected, effluent received for SD & MEE, chemical consumption, haz. waste stock, disposal etc hence submit the same with manifest details.

For and on behalf of
Gujarat Pollution Control Board,
(Name and signature of officers)

R. J. Achaarya
AEE

R. B. Makvana
SO

Representation of the representative of the unit visited (signature only where applicable)

During the visit, the officials has given Suggestions/Corrective Actions for Nos. of issues, in which,

[1] With this site situation/ suggestions, I The undersigned fully agrees.	Yes
--	-----

[2] Item No.of the position/suggestions mentioned in which the applicant disagrees. For which I have the following submission.

Name, designation and signature of the representative
of the unit/recipient of this note:

Mr. Dharmendra Chothani,
GM

Date: 03/12/2024



Observation note of site investigation
ID No. 32789 , Category/ Scale: R/ L , Latitude/ Longitude: 21.62253/ 73.04819
Mr, It is to inform you that, your unit is inspected today dated: 03/12/2024 and during which air/water/hazardous waste/...-..... of...-../....01../...-...../...-... samples have been collected for analysis. During the visit to your unit, errors/defects in respect of environmental laws have been noticed/known on the basis of which the position/issues/suggestions are given in writing herewith for the purpose of providing you an opportunity to be heard as per the principle of natural justice before taking a decision in respect of the pending application and/or taking legal action and/or taking environmental damage compensation. In this regard, you can make a written submission below or a notice is given to submit a written explanation/clarification/completion report to the Board's head office, Gandhinagar and at this office in writing or through XGN or by email within 03 working days.
Site situation//Flaws/Defects found at the time of inspection: 9. At the time of visit, the top of SD feed tank no-2 was found corroded & damaged hence you are required to take necessary corrective action and submit details along with supporting information. 10. Spray Dryer (SD) feed storage tanks are found without breather valve & condensers as per the GPCB guidelines for common spray dryer and no separate stripping facility for SD feed effluent as per guideline is provided. Stripping of SD feed effluent is not being done, clarify for the same and provide all requisite facility as per guideline and inform accordingly along with documentary evidence and clarify for the above.



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REGIONAL OFFICE - 5009/4, G.I.D.C. Estate, Ankleshwar - 393 002. Dist. Bharuch. (Gujarat)

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For and on behalf of Gujarat Pollution Control Board, (Name and signature of officers)	R. J. Achaarya AEE	R. B. Makvana SO
Representation of the representative of the unit visited (signature only where applicable)		
During the visit, the officials has given Suggestions/Corrective Actions for 10 Nos. of issues, in which,		
[3] With this site situation/ suggestions, I The undersigned fully agrees.		Yes
[4] Item No.of the position/suggestions mentioned in which the applicant disagrees. For which I have the following submission.		
Name, designation and signature of the representative of the unit/recipient of this note:		Mr. Dharmendra Chothani, GM
Date: 03/12/2024		



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

CONSOLIDATED CONSENT AND AUTHORIZATION (CC & A)
CCA NO: AWH-129994

By R.P.A.D.

NO: GPCB/ANK-CCA-70(9)/ID-15460/

DT: ___/01/2024

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 rule 6(2) of the "Hazardous & other Wastes (Management & Trans-boundary Movement) Rule-2016, framed under E(P)Act-1986.

And whereas Board has received consolidated application dated **23/06/2023** and inward no.**280636** for the consolidated consent and authorization (CC & A renewal) 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 aforesaid environmental acts)

✓ To,
M/s. PANOLI ENVIRO TECHNOLOGY LTD. (CETP of PETL),
PLOT NO: 619,619-1
GIDC ESTATE PANOLI,
TAL: ANKLESHWAR, DIST-BHARUCH.

1. **Consent Order No. : AWH- 129994 date of Issue 27/10/2023. Valid up to 22/05/2028.**
2. The consent under Water Act -1974 shall be valid up to 22/05/2028 for the use of outlet for the discharge of treated effluent & The consent under Air Act - 1981 shall be valid up to 22/05/2028, Authorization under Environment (Protection) Act, 1986 shall be valid up to 22/05/2028, to operate CETP, for collecting effluent from member industries through tankers, giving treatment & final discharge into FETP-NCT.

Sr. No.	Facility	Quantity
1	Common Effluent Treatment Plant (CETP)	1.02 ML/Day
2	Spray Dryer (for Evaporation of High Concentrated Effluent)	200 KL/Day

Specific Conditions:

- a) This permit shall not increase any hydraulic load at PETL-CETP-FETP.
- b) The spray dryer facility shall be used for member industries to treat their concentrated stream & to reduce the load on PETL/FETP.
- c) The spray dryer facilities shall not receive wastewater containing Solvent/low Boiling liquid.
- d) Unit shall follow coal handling guideline framed by Board and provide close ash handling facility.
- e) Unit shall strictly follow the Fly Ash Notification for disposal of generated ash.

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3. CONDITION UNDER THE WATER ACT:

- 3.1 The quantity of the industrial effluent shall not exceed 1 MLD. (Low COD effluent having COD <10000 mg/l)
- 3.2 The quantity of sewage shall be 20 KLD, which shall be mixed with industrial to effluent in the CETP.
- 3.3 The total water consumption for industrial process and other ancillary operations shall not exceed 30 KLD and for domestic purpose 7 KLD and for gardening purpose 10 KLD as mentioned in form-D of consent application, submitted under water Act-1974.
- 3.4 Overall discharge from PETL-CETP shall not exceed 1.02 MLD to FETP. Unit shall provide magnetic flow meter at the final outlet of ETP with provision of recording.
- 3.5 The unit shall affix of water meters for the purpose of measuring and recording the quantity of water consumed at such places as may be required, within 15 days and it shall be presumed that the quantity indicated by the meter has been consumed by the industry until the contrary is proved.

3.6 TRADE EFFLUENT:

3.6.1(a) Inlet of CETP shall conform to the following standards :

Sr. No.	PARAMETERS	PERMISSIBLE LIMIT
1	pH	6.5 to 8.5
2	Biochemical Oxygen Demand, BOD ₅ , 27° C	3000 mg/L
3	Chemical Oxygen Demand (COD)	10000 mg/L
4	Phenolic Compounds (as C ₆ H ₅ OH)	1 mg/L
5	Ammonical Nitrogen	50 mg/L
6	Free Acidity	55000 ppm
7	Cyanide (as CN)	0.2 mg/L
8	Pesticides	Absent
9	Hexavalent Chromium (as Cr+6)	0.1 mg/L
10	Total Chromium (as Cr)	2 mg/L
11	Copper (as Cu)	3 mg/L
12	Nickel (as Ni)	3 mg/L
13	Zinc (as Zn)	5 mg/L
14	Mercury (as Hg)	0.01 mg/L
15	Lead (as Pb)	0.1 mg/L
16	Arsenic (as As)	0.2 mg/L
17	Cadmium (as Cd)	1 mg/L
18	Selenium (as Se)	0.05 mg/L

Note : CETP-PETL must receive effluent after primary treatment from member units as per above prescribed inlet norms.

3.6.1(b) Outlet of CETP shall conform to the following standards.

Sr. No.	PARAMETERS	PERMISSIBLE LIMIT
1	pH	6.5 to 8.5
2	Temperature	40° C
3	Colour (pt.co.scale)	100 units
4	Total Suspended Solids (TSS)	150 mg/l
5	Total Dissolved Solids (TDS)	10000 mg/l



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6	Biochemical Oxygen Demand, BOD ₅ , 27° C	200 mg/l
7	Chemical Oxygen Demand (COD)	1000 mg/l
8	Oil and Grease(O & G)	10 mg/l
9	Phenolic Compounds (as C ₆ H ₅ OH)	5 mg/l
10	Sulphide (as S)	5 mg/l
11	Ammonical Nitrogen (as N)	50 mg/l
12	Total Kjeldahl Nitrogen (as N)	50 mg/l
13	Phosphate (as P)	5 mg/l
14	Chlorides (as Cl)	1000 mg/l
15	Sulphates (as SO ₄)	1000 mg/l
16	Cyanide (as CN)	0.2 mg/l
17	Fluoride (as F)	15 mg/l
18	Hexavalent Chromium (as Cr+6)	0.1 mg/l
19	Total Chromium (as Cr)	2 mg/l
20	Copper (as Cu)	3 mg/l
21	Nickel (as Ni)	3 mg/l
22	Zinc (as Zn)	15 mg/l
23	Iron (as Fe)	3 mg/l
24	Manganese (as Mn)	2 mg/l
25	Mercury (as Hg)	0.01 mg/l
26	Lead (as Pb)	0.1 mg/l
27	Arsenic (as As)	0.2 mg/l
28	Venedium (as V)	0.2 mg/l
29	Cadmium (as Cd)	0.05 mg/l
30	Selenium (as Se)	0.05 mg/l
31	Bio-assay test	90 % Survival of fish after 96 hours in 100 % effluent
32	Insecticides/ Pesticides	Absent

- 3.6.2 The effluent conforming to the above standards shall be discharged in to G.I.D.C. underground drainage system and conveyed to FETP which ultimately leads to deep Sea for final disposal-through BEIL pipeline.
- 3.6.3 All the effluent treatment units shall be operated and maintain efficiently so that the treated effluent always conform to the specifications referred in condition no.3.6.1(b) above.
- 3.6.4 Leachate collection facilities for the sludge generated during treatment shall be authorization to the ETP for further treatment.
- 3.6.5 in order to enable the board to perform its functions of ascertaining the standards laid down by it for the discharge of the effluent under the condition no. 3.6.1 of this order are complied with by the company while causing discharge of effluent, the applicant shall have to submit every month the analysis report of the sample of effluent got collected and Analyzed by one of the laboratories recognized by the state board.
- 3.6.6 The PETL shall be responsible for collection of effluent from their member units and for the transportation of effluent by tankers to the CETP of PETL
- 3.6.7 Transportation of effluent should be through authorized tankers of PETL. To distinguish the PETL tankers from other tankers the PETL tankers should be coated with special

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- colour say red & marked with the words "Panoli Enviro Technology Limited" (About 6" size).
- 3.6.8 Periodical maintenance of valves of the tanker shall be carried out to avoid any spillage or leakage during transportation. Rubber lined tankers having isolation valve made from PP is desirable.
 - 3.6.9 The PETL shall keep records of their member unit in respect of quality of each product manufactured, quality of water consumption , quality of effluent supplied to CETP and consumption of electricity on day to day basis and required to submit the complied record for one month to GPCB on or before seventh day of the succeeding month.
 - 3.6.10 PETL is required to maintain records of pH sensor based and acid control system for neutralization system of PETL.
 - 3.6.11 PETL shall also require to install pH sensor with alarm device at final out let to ensure that effluent being discharge is always neutral.(pH shall be between 6.5 to 8.5).
 - 3.6.12 Magnetic flow meters shall be installed at the various stages of inlet and outlet of CETP to measure the quality of effluent at each stage of ETP.
 - 3.6.13 ETP shall have to arrange for their tankers operating staff member's special uniform of dark green colour having logo of PETL on the left side shoulder of the uniform and a name plate with the designation shall be clipped on the left shoulder of the uniform. The staff should always be provided with face shield gas mask, hand gloves, gum boots and helmet of green colour having logo of PETL.
 - 3.6.14 PETL shall have to arrange for the sufficient numbers of tankers so that tankers shall always be available within no time to their member unit to avoid any direct discharge of effluent due to non-availability of tankers.
 - 3.6.15 PETL shall instruct and make sure that every member shall have to make storage facilities to store the effluent for atleast 48 hours in an impervious acid proof brick lining tanks/HDPE tanks.
 - 3.6.16 All the activities like collection of effluent from the member unit, transportation to CETP of PETL, unloading of effluent in to the CETP etc. shall be performed by the authorized persons of PETL only. Due care shall be taken to avoid any leakage or spillage of effluent during loading, transportation and unloading.
 - 3.6.17 Apart of the routine tankers some tanker shall be kept reserve for the emergency need of PETL members in case of unforeseen circumstances.
 - 3.6.18 in case of power failure stand by DG sets having power generation capacity equivalent to the requirement of power to run the ETP shall be installed. So that ETP shall always be operated round the clock even in case of power failure.
 - 3.6.19 In case of either maintenance of the CETP or process disturbances. PETL should provide impervious tanks/HDPE tanks/ impervious guard ponds to hold effluent for atleast 72 hours but shall never discharge any treated effluent into the environment.
 - 3.6.20 PETL shall inform immediately to the GPCB, GIDC regarding the termination/suspension of the membership of the CETP of their member unit.
 - 3.6.21 If the products/ process falls in schedule-I or II of the Environment Audit Scheme, as specified in the order dated 13/3/97 of Hon'ble High Court in MCA No:326/97 in SCA No:770/95, M/S PETL shall also abide by the said scheme.
 - 3.6.22 M/s. PETL shall have to register the unit under the provisions of the factories Act-1948 and shall obtain the necessary factory license.
 - 3.6.23 M/s. PETL shall have to obtain P.L.I Policy as per P.L.I Act, 1991 and submit the copy of the same to the GPCB.



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- 3.6.24 the concentration of noise in ambient air within the factory premises shall not exceed the following limit.
Between 6 AM to 9 PM: 75 dB(A)
Between 9 PM to 6 AM: 70 dB(A)
- 3.6.25 M/s. PETL shall make all the requisite arrangements for the safe storage and handling of solid waste including impervious flooring and leachate collection facilities PETL shall store and handle solid waste in accordance with the provisions of the relevant rules in this behalf, after obtaining authorization from GPCB.
- 3.6.26 M/s. PETL shall have and use only one outlet for the discharge of its effluent without requisite treatment and without meeting with the GPCB norms. Such outlet shall be near the front gate/entrance of the unit. The unit shall not keep any bypass line or system, or loose or flexible pipe for discharging effluent outside or even for transporting treated or untreated effluent within the factory premises, within effluent treatment plants or in the compound of the unit.
- 3.6.27 M/s. PETL shall & maintain:
- Put up at the entrance and prominent places boards prominently displaying the name of their member unit details of effluent treatment process of PETL and the name of the directors of the PETL, the electricity consumer number and the name of the electricity consumer as on the record of the GEB.
 - Make adequate lighting arrangement all around the ETPs and also above the standards mentioned in the above clause.
- 3.6.28 M/s. PETL shall submit, within one week from the date of the order, to the GPCB any committee appointed by the court, the site plan of the unit indicating the location of the effluent treatment plants, and also a separate plan indicating the channel through which water/ effluent passes from different stages of effluent treatment process right upto the stage of its final outlet. Such plans shall also be displayed by the unit on a board of adequate size within its compound and near its effluent treatment plants.
- 3.6.29 M/s. PETL shall supply to the GPCB the figures of the consumption of electricity for running the effluent treatment plants by having separate meter/sub-meter for such effluent treatment unit. The number of units consumed by operating the diesel generating sets, if any, shall also be supplied to the GPCB on monthly basis.
- 3.6.30 M/s. PETL shall permit the officers/employees of the GPCB/Government, Members of the committee of the court, Members of the monitoring committee of the Associations of the industries to enter the premises and to inspect and take sample from the unit at any time without any prior permission. All the watchmen/security personnel of the unit shall be immediately apprised of the above.
- 3.6.31 It shall be open to the GPCB through general instruction of circulars and to the GPCB officers' inspecting the unit to give all the support instructions regarding location of the outlet and / or any other appropriate directions regarding effluent treatment plants their operation and processes and disposal channel and disposal system. M/s. PETL shall comply with all such instructions, whether general or special.
- 3.6.32 All the chemicals and nutrients which are required to be added /dosed any where in the ETP should be so added by using "metering Pumps" only.
- 3.6.33 The pipeline connecting various equipment or sumps or tanks of ETP should be minimum in number. Loose connections of hose pipes or temporary connections will not be permitted.

- 3.6.34 In case of plants involving "biomass" treatment, for each addition of biomass time and quantity, should be recorded. The uptake rate of oxygen of the biomass in the aeration basin and other parameters of biological system should be recorded every day.
- 3.6.35 The Printed log-books shall be maintained and get it certified for:
- Energy/Fuel Consumption/consumption of chemicals for treatment of effluent.
 - Wastewater flow at inlet and outlet of ETP.
 - Quantity of sludge generated.
 - Laboratory analysis/ reports for each of the specified parameters of liquid effluents and soil sludge samples.
- 3.6.36 Adequate number of influent and effluent quality monitoring stations should be set up in consultation with the GPCB. Regular effluent quality monitoring should be carried out for relevant parameters and the monitored data along with the statistical analysis and interpretation should be submitted to the GPCB on monthly basis.
- 3.6.37 The ground water quality around the impervious guard ponds site should be monitored on a regular basis. The monitored data should be submitted to this board once in six months.
- 3.6.38 Handling, Manufacturing, storage, and transportation of hazardous chemicals should be in accordance with the Manufacture, Storage, and import of hazardous chemicals Rules 1989.
- 3.6.39 Transportation of effluent, Solid Waste or any other goods pertaining to treatment activities shall be carried out as per Central Motor Vehicle Rule-1989.
- 3.6.40 On-site and off-site Emergency plan as required under the Rules 13 and 14 of the Handling, Manufacturing Storage and import of hazardous chemicals Rules 1989 should be prepared and approval from the board should be obtained.
- 3.6.41 A community Welfare Scheme for improving the socio- economic Environment should be worked out and report submitted to the Board and Government for review.
- 3.6.42 Periodical medical check-up of the workers should be done and records maintained as a measures to provide occupational health services to the workers.
- 3.6.43 M/s. PETL should set up laboratory facilities for collection, analysis of samples under the supervision of competent technical personnel who will report to the Chief Executive.
- 3.6.44 The Environment Management Unit/Cell shall set up to ensure implementation on and monitoring of environment safe guards and other condition stipulated by statutory authorities. The environ management Cell/Unit shall directly report to the Chief Executive of the organization and shall work as a focal point for interesting environment issues. These Cells/Units also co-ordinate the exercise if the environment audit and preparation of environmental statements.
- 3.6.45 The Environment audit shall be carried out yearly and the environmental statements pertaining to the previous year shall be submitting to this state board latest by 30th September every year.
- 3.6.46 The funds earmarked for the environmental protection measures should not be diverted or any other purpose and year wise expenditure should be reported to this board and to the Government
- 3.6.47 Storm Water shall not be mixed with the industrial effluent. Disposal system for storm water shall be provided separately.
- 3.6.48 Good housekeeping shall be maintained within the industrial premises. All pipes, Valves and drains shall be leak proof. Floor washing shall be admitted in to the effluent collection system for subsequent treatment and disposal.



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- 3.6.49 M/s. PETL shall intimate the occurrence of any accident, act or event resulting in discharge of poisonous, noxious or polluting matter or the likelihood of the same into a stream or well, to the regional office under the intimation to the Member Secretary in accordance with section 31 (1) of the Water Act.
- 3.6.50 GPCB reserves the right to review and/of above revoke the consent and/or make modification in the condition which it may deem fit in accordance with provisions of water Act -1974 as amended from time to time.
- 3.6.51 In case of change of ownership/management the name and address of the new owners/partners/directors/proprietors should immediately be intimated to the board.
- 3.6.52 The consent granted shall lapse at any time if any parameters or any conditions of this consent order are not complied with.
- 3.6.53 PETL shall strictly observe and make sure that every member shall supply entire effluent quantity as per the booked quantity and ensure that quality of the effluent matches with data submitted before entering in agreement with you and your member unit accordingly.
- 3.6.54 PETL shall have to comply with High Court directives and not allow any new member and/or enhance quantity of trade effluent of existing industrial units/members those who are having effluent discharge unless and until they have prior permission of the board.
- 3.6.55 PETL shall ensure that each and every member renews the agreement on/before expiry of said agreement pertaining to transportation and treatment of trade effluent and inform board about any unit renewing the agreement within stipulated period.
- 3.6.57 PETL shall have to maintain complete data pertaining to the quantity of trade effluent, quantity of waste water generated, booked and supplied to PETL, no. of tankers showing actual quantity of waste water supply stating COD and acidity etc. of each individual member, including list of non-complied members etc. and aforesaid details shall be submitted at RO Bharuch on weekly basis and cumulative details submitted at Head Office on quarterly basis without fail.
- 3.6.59 PETL shall have to modify/ improve performance of existing effluent treatment facilities for efficiency in order to comply with prescribed standards in respects of effective operation of effluent treatment plant with regards to notification No:111(3) Board 's standards/33129 dated 30th October 2001 in light of high court order in SCA No:4473 of 97 dated 21/10/99.

4. CONDITIONS UNDER THE AIR ACT:

4.1 The following shall be used as fuel:

Sr. No.	FUEL	Quantity
1.	Diesel	40 Lit/Hr.
2.	Coal / Lignite	1.47 MT/Hr.

4.2 PETL shall install & operate comprehensive adequate air pollution in order to achieve prescribed norms control system so as to achieve standards.

4.3 The flue gas emission through stack shall conform to the following standards:

Stack No.	Stack attached to	Stack Height (m)	Air Pollution Control measure	Parameter	Permissible Limit
1.	Hot Air Generator (64 Lac kcal/hr.)	20	Bag Filter	PM SO ₂ NO _x	100 mg/NM ³ 100 ppm 50 ppm
2.	D. G. Set (180 KVA)	9	--	PM SO ₂ NO _x	150 mg/NM ³ 100 ppm 50 ppm

4.4 The Process emission through various stacks/ vent of reactors, process, vessel shall conform to the following standards.

Stack No.	Stack attached to	Stack Height (m)	Air Pollution Control measure	Parameter	Permissible Limit
1.	Spray Dryer (for High Concentrated Effluent)	11	Cyclone Separator + Water Scrubber	PM	100 mg/NM ³

4.5 The concentration of the following parameters in the ambient air within the premises of the industry shall not exceed the limits specified hereunder.

PARAMETERS	PERMISSIBLE LIMIT (microgram /M ³)	
	Annual	24 Hours Average
Particulate Matter (PM ₁₀)	60	100
Particulate Matter (PM ₂₅)	40	60
Oxide of Sulphur(SO _x)	50	80
Oxide of Nitrogen(NO _x)	40	80

- Annual arithmetic mean of minimum 104 measurements in a year at a particular site taken twice a week 24 for hourly at uniform intervals.
- 24 Hourly or 08 hourly or 1 Hourly monitored values, as applicable ,shall be complied with 98 % of the time in a year 2 % of the time they may exceed the limits but not on two consecutive days monitoring.

4.6 The applicant shall operate industrial plant / air pollution control equipment very efficiently and continuously so that the gaseous emission always conforms to the standards specified in condition as above.

4.7 The consent to operate the industrial plant shall lapse if at any time the parameters of the gaseous emission are not within the tolerance limits specified in the condition as above.

4.8 The applicant shall provide portholes, ladder, platform etc at chimney(s) for monitoring the air emissions and the same shall be open for inspection to/and for use of Board's staff. The



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chimney(s) vents attached to various sources of emission shall be designed by numbers such as S-1, S-2, etc. and these shall be painted/displayed to facilitate identification.

4.9 The Industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standards in respect of noise to less than 75 dB(a) during day time and 70 dB (A) during night time. Daytime is reckoned in between 6a.m. and 10 p.m. and nighttime is reckoned between 10 p.m. and 6 a.m.

4.10 All efforts shall be made to control VOC emission and Odor problem, if any

5. GENERAL CONDITIONS: -

5.1 Any change in personnel, equipment or working conditions as mentioned in the consents form/order should immediately be intimated to this Board.

6. AUTHORISATION FOR THE MANAGEMENT & HANDLING OF HAZARDOUS WASTES Form-2 (See rule 6 (2))

6.1 M/s. PANOLI ENVIRO TECHNOLOGY LTD. (CETP of PETL) is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at PLOT NO: 619,619-1, GIDC ESTATE PANOLI, TAL: ANKLESHWAR, DIST-BHARUCH.

Sr. No	Type of Waste	Category	Quantity in Year	Facility
1	CETP Sludge	34.3	3300 MT	Collection, Storage, Transportation, Disposal at TSDF- BEIL.
2	Used Oil / Lube Oil	5.1	30 lit	Collection, Storage, Transportation, Disposal by selling to registered re-refiners.
3	Discarded Container/Bags	33.1	1 MT	Collection, Storage, De-Contamination and Reuse.

6.2 The authorization is granted to operate a facility as above.

6.3 The authorization shall be in force for a period up to 22/05/2028.

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

7. TERMS AND CONDITIONS OF AUTHORISATION:

7.1 The authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.

7.2 The authorization or its renewal shall be produced for inspection at the request of an officer authorised by the Gujarat Pollution Control Board.

7.3 The person authorised shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorisation.

7.4 Any unauthorised change in personnel, equipment or working conditions as mentioned in the application by the person authorised shall constitute a breach of his authorisation.

7.5 The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as

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- spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
- 7.6 The person authorised 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"
- 7.7 It is the duty of the authorized person to take prior permission of the Gujarat Pollution Control Board to close down the facility.
- 7.8 The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
- 7.9 The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
- 7.10 The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilisation of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorisation.
- 7.11 The importer or exporter shall bear the cost of import or export and mitigation of damages if, any.
- 7.12 An application for the renewal of an authorization shall be made as laid down under Hazardous & Other Wastes (Management and Transboundary Movement) Rules-2016.
- 7.13 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.
- 7.14 Annual return shall be filed by June 30th for the period ensuring 31st March of the year.
- 7.15 Unit shall have to display the relevant information with regard to hazardous waste as indicated in the Court's order in W.P. No. 657 of 1995 dated 14th October 2003.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

Arun G. Patel
29.01.2024

(Arun G. Patel)
ENVIRONMENT ENGEENIER

Outward No: 782205, 29/01/2024



456 GUJARAT POLLUTION CONTROL BOARD

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

By RPAD

CCA-Amendment
(Consent No: - AH-136911)

No. GPCB/BRCH-B-CCA-143(8)/ID-40137/

Date:

To,
M/s. BEIL Infrastructure Ltd,
Plot No. D-43, GIDC Dahej,
Tal- Vagra, Dist: Bharuch.

Sub: Amendment Consolidated Consent and Authorization(CC&A) under various Environment Acts / Rules.

- Ref:** (1) Your application inward No. 311346 dated 16/05/2024.
 (2) EC to CTE dated: 24/12/2019.
 (3) CC&A Order No. AWH-109249 date of issued 14/09/2020 and then after amendment.

Sir,

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 rule 6(2) of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016, framed under the EP Act-1986 and without reducing your responsibility under the said acts / Rules in any way; this Board is empowered to amend consent order in connection with above reference the CCA Order No. AWH-109249 issued under the provisions of the various environment Acts/ Rules, which stands amended as under.

The consent for shall be valid up to 17/04/2025.

1. Condition no.1 of the CC&A order AWH-109249 shall be amended as under:

Sr. No.	Product	Existing	Proposed	Total
1.	Common Secured landfill site (TSDF)	Cell-1 : 1,65,400 MT (Closed) Cell 2 & 5 : 3,12,960 MT (Partially Closed) Cell-3 : 1,65,689 MT (In operation) Cell-4 : 1,75,385 MT (In operation)	Cell-11: 76,369 MT Cell-12: 88,948 MT Cell-13: 1,04,004 MT	Cell-1 : 1,65,400 MT (Closed) Cell 2 & 5 : 3,12,960 MT (Partially Closed) Cell-3 : 1,65,689 MT (In operation) Cell-4 : 1,75,385 MT

Outward No. 822897, 27/09/2024

		Cell-6: 2,61,312 MT (In operation) Cell-7: 1,19,468 MT Cell-8: 1,05,942 MT Cell-9: 94,708 MT Cell-10:1,29,815 MT		(In operation) Cell-6: 2,61,312 MT (In operation) Cell-7: 1,19,468 MT Cell-8: 1,05,942 MT Cell-9: 94,708 MT Cell-10:1,29,815 MT Cell-11: 76,369 MT Cell-12: 88,948 MT Cell-13:1,04,004 MT
2.	Multi Effective Evaporator (MEE)	200 KLD	----	200 KLD
3.	Spray Dryer	4800 Kg/Hr	----	4800 Kg/Hr
4.	De-Contaminated & De-toxified packing material (drum, carboy, liners etc.)	2,10,240 Nos/Year	----	2,10,240 Nos/Year
5.	De-Contaminated & De-toxification Tanker	36,000 Nos/Year	----	36,000 Nos/Year
6.	Incinerator	12 M Kcal/Hr	----	12 M Kcal/Hr

2. SPECIFIC CONDITIONS:

2.1 Unit shall comply with all the conditions laid down in Environment Clearance (EC) issued by SEIAA vide letter no. SEIAA/GUJ/EC/7(d)/227/2013 dated 22/07/2013 and MoEF&CC vide letter no.F.No.10-43/2016-IA-III dated 19/12/2018.

3. The validity and other terms and conditions mentioned in CCA Order No. AWH-109249 and then after amendment shall remain unchanged.

For and on Behalf of
Gujarat Pollution Control Board

(Signature)
27/09/2024

(N. A. Shah)

Unit head, Hazardous waste cell

Outward No:822897,27/09/2024



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

By RPAD

CCA-Amendment
(Consent No: AH-134283)

No. GPCB/HAZ-ANK-CCA-167(23)/ID-14983/

Date:

To,
M/s. ~~BEIL~~ Infrastructure Ltd,
Plot No. 9701-9716, 9801-9828, 9901-9906, 9923-9928, 9601-9604,
10001-10003, G-7&8, 7924-7927, 9401-9412, 9501-9506,
7905 E to H, GIDC Estate,
Ankleshwar-393002, Dist: Bharuch

Sub: Amendment Consolidated Consent and Authorization (CC&A) under various Environment Acts/Rules.

Ref: (1) Your application inward No. 287189 dated 03/11/2023.

(2) CC&A order no: AWH-126148, dt.14/08/2023, Amendment order No. AH-126201 dt.18/08/2023, Amendment order No. AH-126200 dt. 22/08/2023 and Amendment order No. AH-132111 dt.06/03/2024.

(3) CTE order no. 118393 dt.09/05/2022.

Sir,

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)-1981 and Authorization under rule 6(2) of the Hazardous and other Wastes (Management and Transboundary Movement) Rules 2016 & as amended from time to time framed under the Environment (Protection) Act-1986, this Board is empowered to amend consent order in connection with above reference the CCA order No.AWH-126148, AH-126201, AH-126200 and AH-132111 issued under the provisions of the various Environment Act/ Rules, which stands amended as under.

This CC&A is hereby granted for the precious metal recovery: 1 MTPA from E-waste- 700 MTPA.

1. Condition no. 1 the CCA order AWH: 126148 shall be amended as under:

Sr. No.	Product	Capacity
1.	Common secured landfill site (TSDF)	Cell 1 & 2 : 23,00,000 MT [Closed and capped] Cell 3 : 14,58,000 MT [Operational] Phase IV-Cell A : 3,60,000 MT [Operational] Phase IV-Cell B : 6,27,000 MT [Operational]
2.	Incineration Facility along with heat recovery system	1) Incinerator 1 - 6.5 Million Kcal/Hr (60 MTD) 2) Incinerator 2 - 6.5 Million Kcal/Hr (60 MTD)
3.	Multi Effective Evaporator System (Integrated with incinerator)	15 MT/Hr
4.	Plastic Granules (Recyclable)	75 MT/Month

ID: 14983 M/s. BEIL Infrastructure Ltd.

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5.	Processing of plastic waste to reuse as RDF	100 MT/Month
6.	Drum-Decontamination and disposal System	1,08,000 Nos/Year
7	Pre-Processing facility	Waste mix Liquid – 16,000 MTPA Waste mix Solid – 10,000 MTPA
8	E-Waste Collection, Storage, Transportation, dismantling and Recycling	700 MTPA
9	Precious Metal Recovery from E-Waste-700 MTPA	1 MTPA

2. Condition no. 2 of the CCA order AWH:126148 and then after amendment orders following additional Specific condition are added for precious metal recovery facility as under:

- 2.1 Unit shall comply with the provisions of the E-Waste (Management) Rules – 2022 notified vide G.S.R. 801(E) dt. 02/11/2022 and subsequent amendments.
- 2.2 Unit shall dispose Copper Sulphate Solution, Copper and Aluminium metal generated during recycling of E-Waste to authorized recyclers through manifest system.

3. Condition no. 4.5 under Air Act-1981 of the CCA order AWH:126148 and then after amendment orders shall be amended as under:

- 4.5 The process gas emission through stack attached to the hazardous waste incinerator shall conform to the following standards :

Sr No.	Stack attached to	Stack height in meter	APCM	Permissible limit
1.	Incinerator-1 & 2 (each 6.5 million kcal/hr)	45 (Each)	Quencher, Cooler, Bag filter, Scrubber	Emission standards for hazardous waste as approved by CPCB and published in guideline of common hazardous waste incinerator given at condition no.4.4 of the CCA order AWH:126148
2.	Landfillable waste stabilization area	11	Alkali Scrubber	PM-150 mg/Nm ³ HCL-20 mg/Nm ³
3.	Waste handling area	11	Alkali Scrubber	HCL-20 mg/Nm ³ Cl2-9 mg/Nm ³
4.	Spray Dryer (9000 Kg/hr)	45	Wet scrubber, Cyclone separator / Bag house	PM-150 mg/Nm ³
5.	Dismantling section & CRT crushing chamber of E Waste plant	11	Alkali Scrubber	PM-150 mg/ Nm ³ HCl- 20 mg/ Nm ³



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PARYAVARAN BHAVAN, SECTOR 10-A,
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6.	Waste handling area of landfill	12	Alkali Scrubber	PM-150 mg/ Nm ³ HCl- 20 mg/ Nm ³
7.	Tank farm area	15	Alkali Scrubber	HCl- 20 mg/ Nm ³ Cl ₂ - 9 mg/ Nm ³
8.	Pre-processing area-1	15	Alkali Scrubber	HCl- 20 mg/ Nm ³ Cl ₂ - 9 mg/ Nm ³
9.	Pre-processing area-2	15	Alkali Scrubber	HCl- 20 mg/ Nm ³ Cl ₂ - 9 mg/ Nm ³

4. Condition no. 5.2 under Hazardous waste management Rules-2016 of the CCA order AWH:126148 and then after amendment orders shall be amended as under:

5.2 Condition no. 5.2 of CCA order no. AWH-126148 shall be read as under:

Sr. No.	Type of waste	Category	Quantity	Disposal mode
1.	Organic Incinerable Waste	--	43200 MTPA	Received from member units through dedicated vehicle/store/incinerate in incinerator within premises.
2.	Used oil	5.1	7.8 KLPA	Collection, storage & Transportation, sale to authorize register recycler.
3.	Discarded Container/ barrels for Decontamination	33.1	1,08,000 Nos/Year	Collection, Reception, Storage & decontamination within premises.
4.	Empty Barrels/Containers/Liners contaminated with hazardous/chemicals/wastes	33.1	1404 MTPA	Collection, Generation, Storage & Transportation and sale to authorized register recycler or decontamination within premises.
5.	Ash from incinerator and flue gas cleaning residue	37.2	12632 MTPA	Collection, Storage and Disposal in own TSDF
6.	Chemical Sludge from waste water treatment	35.3	33200.4 MTPA	Collection, Storage and Disposal in own TSDF
7.	Insulation and NRP (Non recyclable Plastic)	--	109.5 MTPA	Collection, Storage and Disposal in own TSDF or sale to authorized recycler
8.	E- waste collection, storage, transportation, dismantling and recycling	--	700 MTPA	Collection, Reception, Storage & Dismantling, recycling within premises
9.	Fly ash from Hag in Spray Dryer	--	1280 MTPA	Collection, Storage and landfilling/Incineration waste stabilization or disposed in secured landfill
10.	ETP Sludge (MAP+ETP)	35.3/ Sch I	2697.35 MTPA	Collection, Storage and Disposal in own TSDF

ID: 14983 M/s. BEIL Infrastructure Ltd.

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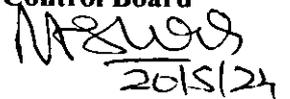
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11.	Copper Sulphate	31.1/ Sch I	20 MTPA	Collection, storage & Transportation and sale to authorized register recycler.
12.	Sludge from Aqua Regia	31.1/ Sch I	0.15 MTPA	Collection, storage & Transportation and sale to authorized register recycler.

5. The validity and other terms and conditions mentioned in the CCA Order No.AWH-126148 vide letter no. GPCB/HAZ-ANK-CCA-167(22)/ID: 14983/750850 dated 14/08/2023, then after Amendment order No. AH-126201 date of issued 18/08/2023, Amendment order No. AH-126200 date of issued 22/08/2023 and Amendment order No. AH-132111 dt.06/03/2024 shall remain unchanged.

**For and on Behalf Of
Gujarat Pollution Control Board**


20/05/24

(N. A. Shah)

Unit head, Hazardous waste cell



GUJARAT POLLUTION CONTROL BOARD

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

BY RPAD

AMENDMENT OF CONSENT AND AUTHORIZATION (CC & A - Amendment)

No. GPCB/HAZ-ANK-CCA-167(24)/ID-14983/

Date:

To,

M/s. BEIL Infrastructure Ltd,

Plot No. 9701-9716, 9801-9828, 9901-9906, 9923-9928, 9601-9604,
10001-10003, G-7&8, 7924-7927, 9401-9412, 9501-9506,
7905 E to H, GIDC Estate,
Ankleshwar-393002, Dist: Bharuch

Sub: Correction in Consent and Authorization (CC&A-Amendment).

Ref: (1) The Board has granted Consent and Authorization (CC&A-Amendment) order No: **AH-134283**, issued vide letter no. GPCB/HAZ-ANK-CCA-167(23)/ID-14983/811668, dated 20/05/2024.
(2) Your letter bearing no: BEIL/ANK/2024-25/10 dt. 30/05/2024.

Sir,

The board has granted CC&A-Amendment order No: AH-134283, issued vide letter no. GPCB/HAZ-ANK-CCA-167(23)/ID-14983/811668, dated 24/05/2024. Now correction in CC&A-Amendment is granted as under.

1. The product quantity is corrected and shall be read as under:

Sr. No.	Product	Quantity
9	Precious Metal Recovery from E-Waste-700 MTPA	1 KGPA

In place of

Sr. No.	Product	Quantity
9	Precious Metal Recovery from E-Waste-700 MTPA	1 MTPA

2. The validity and other terms and conditions mentioned in the CCA Order No.AWH-126148 vide letter no. GPCB/HAZ-ANK-CCA-167(22)/ID: 14983/750850 dated 14/08/2023, then after Amendment order No. AH-126201 date of issued 18/08/2023, Amendment order No. AH-126200 date of issued 22/08/2023, Amendment order No. AH-132111 date of issued 06/03/2024 and Amendment order No. AH-134283 date of issued 06/03/2024 shall remain unchanged.

For and on Behalf Of
Gujarat Pollution Control Board

24/6/24

(N. A. Shah)

Unit head, Hazardous waste cell

ID-14983 M/s. BEIL Infrastructure Ltd

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Website : <https://gpcb.gujarat.gov.in>



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

STAY OVER DIRECTION UNDER SECTION 31-A OF THE AIR (PREVENTION AND CONTROL OF POLLUTION) ACT-1981. BY R.P.A.D

Whereas you are having an industrial plant situated at **PLOT NO: 7921-22-23, GIDC ANKLESHWAR, DIST.BHARUCH, Gujarat.**

AND WHEREAS GPCB has issued closure direction under Section-31 A of the Air Act-1981 for the closure of your industrial plant vide letter No. GPCB/ANK/CCA-1360(13)/ID-32798/828631, dated 05/12/2024 for the reasons stated therein.

AND WHEREAS your electricity supply disconnected on 05/12/2024 and water supply disconnected on 07/12/2024.

AND WHEREAS you have submitted undertaking dated 03/01/2025, 08/01/2025 and 31/01/2025 ensuring that you have complied directions issued to you by the Board.

AND WHEREAS you have submitted bank guarantee worth Rs. 10,00,000/- of ICICI Bank, valid up to 10/12/2025.

AND WHEREAS, you have paid Rs. 1,00,00,000/- (Rs. One Crore only) to the Board as an Interim Environmental Damage Compensation (EDC).

AND WHEREAS, authorized officer of the board had visited your industry on **09/01/2025** and observed that:

1. The unit is not in operation as the power and water connection is disconnected by competent authorities.
2. Unit has carried out complete safety interlock of the SD plant checked & submitted its report.
- 3: Unit has submitted the compliance report of the DISH direction order along with revocation application. DISH-Bharuch has revoked its closure to this unit vide order dated - 26/12/2024.
4. Unit has submitted valid PLI policy. Unit has submitted site notification (site plan approved by DISH) with revocation application.
5. Unit has submitted onsite and offsite emergency plan with revocation application.
6. During inspection the spray dryers are not in operation and no any activity is observed at the incident area Near Spray dryer feed tank No-1.
7. During the inspection the Spray dryer feed tank No-1 is filled with wastewater in as it is condition, as observed at the time of incident. As per records submitted 48.8 KL effluent is stored in this tank, presently. Unit has submitted that they will empty out this tank after

clearance from all departments like DISH, Police, GPCB & Revenue and then after the effluent will be disposed as per rules.

8. During the inspection the Spray dryer feed tank No-2 is filled with wastewater in as it is condition, as observed at the time of incident and @ 26 KL of effluent is stored in the tank which will be disposed as per norms. Unit has submitted that after getting clearance from all the departments they will first repair the Spray dryer feed tank No-1 and after that they will repair the Spray dryer feed tank No. 2.
9. Unit has submitted the time bound action for installation of breather valve in SD feed tanks. Unit has submitted that they will utilize one of the existing stripper facility attached to existing MEE plants installed, for stripping.

AND WHEREAS, you have submitted revised time bound action plan on 07/02/2025 for remaining activities w.r.t. Closure order.

AND WHEREAS, you have submitted spray drying process flow diagram and has stated to operate Spray dryer feed effluent storage tank No. 2 at a capacity of 75% of CCA granted capacity.

AND WHEREAS, you have revised list of analytical parameters to be checked in incoming wastewater after the incident

Under the circumstances, I, Arun G. Patel, Environment Engineer, Gujarat Pollution Control board is directed to revoke the closure direction issued vide letter No. GPCB/ANK/CCA-1360(13)/ID-32798/828631, dated 05/12/2024 to satisfy GPCB regarding the functioning (Compliance) of closure direction issued to your industrial plant with following condition:

- a) Unit shall comply with CCA conditions.
- b) Unit shall comply with undertakings dated 03/01/2025, 08/01/2025 and 31/01/2025.
- c) Unit shall not use Spray dryer feed effluent storage tank No. 1 until repaired and certified by Competent Authority and without prior intimation to Board.
- d) Unit shall operate the entire plant (common facility) on 75% capacity of CCA quantity except spray dryer facility which shall be operated on 50% capacity of CCA quantity.
- e) Unit shall comply with the revised time bound action plan submitted on 07/02/2025 and shall submit completion report to Board.
- f) Unit shall comply with submitted time bound action plan of recommendation points of Safety audit and HAZOP study and submit completion report to Board.
- g) Unit shall submit final report of assessment of Environment Damage compensation through institute of national repute to decide final EDC.
- h) Unit shall strictly follow the Spray dryer process flow diagram submitted with reply dt. 06/02/2025. Unit shall use existing stripper provided with MEE till dedicated stripper



465 GUJARAT POLLUTION CONTROL BOARD

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

with spray dryer is not provided. But in no cases, unit shall deviate the submitted process flow diagram.

- i) Unit shall provide the treatment processes listed in Spray dryer process flow diagram prior storing and disposing remaining effluent present in Spray dryer feed effluent storage tank No. 1 and 2.
- j) Unit shall check the analytical parameters in incoming effluent from member industries as submitted with reply dt. 06/02/2025.
- k) Unit shall comply with the order/ direction of the Hon. NGT PB matter O.A. 1384/2024. (New O.A. No. 04/2025 (WZ).

Also the concerned authorities are hereby directed to **RECONNECT** the electricity supply and water supply **FOR THREE MONTHS** from the date of the issue of this order.

This letter is issued with the approval of the competent authority.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD,

Arun G. Patel
12.02.2025
(Arun G. Patel)
ENVIRONMENT ENGINEER

No: GPCB/ANK/CCA-1360(18)/ID-32798/

Date: /02/2025

Issued to:

✓ M/s. DETOX INDIA PRIVATE LIMITED
PLOT NO: 7921, 7922, 7923,
GIDC ESTATE ANKLESHWAR,
DIST: BHARUCH, GUJARAT.

Copy to:

1. The Dy. Engineer (O&M)

Dakshin Gujarat Vij Company Ltd (DGVCL),
GIDC Sub-Division, DGVCL,
Plot No. U/4/2, Opp: GIDC Police Station,
GIDC Ankleshwar, Dist. Bharuch.

With a request to **Re-connect** the Electric supply of M/s. DETOX INDIA PRIVATE LIMITED, PLOT NO: 7921, 7922, 7923, GIDC ESTATE ANKLESHWAR, Dist. Bharuch **FOR THREE MONTHS** from the date of issue of this order.

2. The Chief Officer

Ankleshwar Notified Area
Plot No.618/619,
GIDC Ankleshwar,
Dist: Bharuch

With a request to **Re-connect** the Water supply of **M/s. DETOX INDIA PRIVATE LIMITED**, PLOT NO: 7921, 7922, 7923, GIDC ESTATE ANKLESHWAR, Dist. Bharuch **FOR THREE MONTHS** from the date of issue of this order.

3. Regional Officer

Regional Office,
Gujarat pollution Control Board,

Ankleshwar..... To send fresh IR/AR with compliance of this direction in time limit.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD,

Arun G. Patel
12.02.2025

(Arun G. Patel)
ENVIRONMENT ENGINEER

Outward No:854003, 12/02/2025