

BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, PUNE  
APPLICATION NO 81 OF 2014 (WZ)

**IN THE MATTER OF:**

Kantha Vibhag Yuva Koli Samaj Parivartan Trust and Ors ...Applicants

VERSUS

State of Gujarat and Ors.

...Respondents

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Place: Pune

Date:19.07.2025

Filed By:-



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BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, PUNE  
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**ADDITIONAL SUBMISSIONS ON BEHALF OF THE APPLICANTS  
TO SURAT MUNICIPAL CORPORATION/RESPONDENT NO.4  
REPLY AFFIDAVIT DATED 17.12.2022 PURSUANT TO THE  
ORDER DATED 04.05.2023**

Most Respectfully showeth as under: -

1. That the present submissions are being filed on behalf of the applicant to the submissions dated 02.04.2025 to the reply affidavit dated 17.12.2022 filed by Respondent no.4/Surat Municipal Corporation pursuant to the order dated 04.05.2023 passed in the above-mentioned matter and also as a response to the report of the Joint Committee. The submissions made hereinbelow be read in conjunction with the status report dated 10.09.2022 and Submissions dated 02.04.2025 filed by the Applicants.
2. The Applicants respectfully submit the following additional submissions based on the continued violations of MSW Rules, 2016 by Respondent no. 4-Surat Municipal Corporation (SMC) during the

pendency of the present OA and failure to address the violations on being informed of the same by the applicants.

### **I. ILLEGAL DUMPING OF UNTREATED, UNPROCESSED MSW IN 10.55 HA AREA AT KHAJOD**

At the Khajod MSW site, R-4/SMC has developed 3 nos SLF cells No. 1, 1A (extension of SLF No. 1) and 2 for which it has permission from GPCB. The SLF Cell No. 2 has been closed as it has reached its permitted capacity. Presently, all the three SLF cells have reached their capacities. As the Khajod site is receiving MSW of Surat City and other surrounding municipalities, the untreated and unprocessed MSW is being dumped in the southern area of SLF Cell 1, 1A in open area. The open dumping of MSW has led to creation of an illegal 10.55-hectare dump site within the Khajod premises where over 8 lakh tonnes of raw, untreated MSW is being dumped in violation of the Solid Waste Management Rules, 2016. This constitutes a direct breach of Rule 15(zc) and Rule 11(e) of the SWM Rules, 2016, which obligate local bodies to ensure that waste is processed scientifically and not dumped in open spaces. The R-4/SMC has not taken permission from GPCB for open dumping and neither constructed SLF Cell for dumping. This new illegal dump site violates Clauses of the Action Plan previously submitted by SMC and undermines the very purpose of scientific solid waste management. This illegal dump site has come up while the OA is pending consideration before this Hon'ble Tribunal.

## **II. FAILURE OF LEACHATE COLLECTION AND GROUNDWATER CONTAMINATION**

The Respondent's affidavit remains silent on the failure of leachate collection mechanisms in SLF Cell Nos. 1 and 1A. The ponding of leachate and emission of gases, is taking place at SLF Cell No, 1 and 1 A which demonstrates that leachate management is not taking place as per permission granted by GPCB. This is a violation of Schedule I, Parameters 3 & 4 of the SWM Rules, 2016 which mandate provision of proper liners and leachate collection systems. The absence of proper lining and leachate management has also resulted in groundwater contamination. The previous reports of GPCB that are part of record in the present OA, highlight the serious issue of groundwater contamination. The Applicants have requested joint sampling of groundwater with GPCB and CPCB to assess environmental damage, which is yet to be acted upon.

## **III. OPEN BURNING AND NON-REMEDIATED BHATAR SITE**

Despite claims of compliance, open burning of MSW continues both at Khajod and the officially closed Bhatar dump site. There are fire incidents on 13.01.2025, 09.04.2025, and 24.03.2025 contradict SMC's assertions of site closure and compliance. The open burning is in blatant violation of Rule 15(za) and Rule 21(2) of the SWM Rules, which prohibit burning of solid waste in open or in landfills and is violation of the interim order passed in the present OA that prohibits any fire incidents at MSW site.

The Bhatar site is yet to be remediated, and constant fire incidents have been reported. The applicant in addition to photographs has videos of these fire incidents that highlights the urgency of the situation.

#### **IV. NON-UTILISATION OF METHANE FROM REMEDIATED LEGACY WASTE**

Post-capping of legacy dumps, methane gas emissions continue unchecked, impacting health and damaging nearby infrastructure like Dream City and Surat Metro Yard. SMC has no plan in place for its capture or utilisation despite an estimated 113 TPD methane release (ISRO-IIRS). This is in contravention of Schedule I, Parameter 6 of the SWM Rules, 2016 which requires landfill gas management.

#### **V. FINANCIAL AUDIT OF WORKING OF WASTE PROECCESING AND COMPOST PLANT AT KHAJOD**

It has come to attention that the waste to compost plant of 600 TPD at Khajod site is not undertaking segregation, processing of the MSW received as the same is evident from the MSW being dumped on 10.5 ha open area next to SLF Cell No. 1 and 1A. The perusal of the photographs shows that it is not inert material that is being dumped but plastic, organic etc waste is being dumped and this points in the direction of alleged generated fabricated data to show compliance by operator of the facility. There is an urgent need for a forensic financial

and environmental audit of Khajod operations to determine misuse of public funds and statutory non-compliance. The key issues have been tabulated below for ready reference:-

Key Issues and violations by Surat Municipal Corporation/R-4

<b>S. No.</b>	<b>Issue</b>	<b>Violation / Concern</b>	<b>Relevant Provision(s) Violated of MSW Rules, 2016</b>
1	Illegal creation of 10.55 ha dump site at Khajod	Over 8 lakh tonnes of unprocessed MSW dumped without authorization	Rule 11(e), Rule 15(zc), Schedule I
2	Failure of Leachate Management in SLF Cells 1 and 1A	Leachate overflowing, ground contamination, no drainage	Schedule I (Parameters 3 & 4), Rule 15(1)(d), Rule 11(h)
3	Open burning of waste at Khajod and Bhatar sites	Multiple documented fire incidents on 13.01.2025, 09.04.2025, and 24.03.2025	Rule 15(za), Rule 21(2)
4	Non-remediation of Bhatar legacy site	Dumping continues; site used for habitation by vulnerable groups	Rule 15(1)(c), Rule 22
5	Non-capture and emission of landfill gases from capped legacy waste	Methane emissions from remediated dump pose explosion and health risk	Schedule I (Parameter 6), Rule 15(1)(g)
6	Non-utilization of processed output from Bio-mining	No record of sale of RDF, compost, C&D materials recovered	Rule 15(1)(i), Rule 21(1), Schedule II
7	Fabrication of operational data by contractors	SBM portal and GST invoice mismatch with ground reality	Rule 15(1)(e), Rule 16(2), SBM(U) Guidelines

The applicant has brought all these violations to the attention of the R-4/SMC and GPCB but no action is visible on the ground as unabated open dumping of MSW is taking place at Khajod site. The true copy of the representations along with the annexures sent by the applicant to respondents is annexed herewith and marked as **Annexure A/1 (Colly)**.

In view of the above the Hon'ble Tribunal may be pleased to:

1. To direct GPCB to undertake joint sampling and groundwater testing in and around Khajod MSW site;
2. Pass a direction to R-4/SMC to stop and prevent fire incidents at Khajod MSW and Bhatar site;
3. Forfeit the performance guarantee submitted by R-4/SMC pursuant to the order of this Hon'ble Tribunal;
4. Take action against R-4/SMC for violation of the MSW rules, 2016;
5. Prohibit R-4/SMC from open dumping of untreated, unsegregated MSW;
6. Direct Joint committee to undertake site visit to ascertain the ground situation as regards to MSW.

Place: Pune

Date:19.07.2025

Filed By:-



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ANNEXURE A/1 (COLLY)

M.S.H. SHEIKH &lt;2mshsheikh@gmail.com&gt;

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**About irregularities and illegalities in Municipal Solid Waste Disposal by Surat Municipal Corporation and action to stop pollution.**

---

**M.S.H. SHEIKH** <2mshsheikh@gmail.com>

Sun, Apr 27, 2025 at 3:49 PM

To: secyurban@nic.in, Secretary MOEFCC <secy-moef@nic.in>, rmishra77@nic.in, js.sbm-mohua@gov.in, BINAY KUMAR JHA <binay.jha@nic.in>, "Shri. V.K. Chaurasia Joint Adviser PHEE CPHEEO" <vk.chaurasia@nic.in>, Sravanthi Jeevan <sravanthi.kanamala@gov.in>, ccb.cpcb@nic.in, asnpg.mefcc@gov.in, asag-moefcc@gov.in, securban@gujarat.gov.in, Principal Secretary DOEF <secfed@gujarat.gov.in>, Chairman GPCB <chairman-gpcb@gujarat.gov.in>, Director Environment <direnv@gujarat.gov.in>, commissioner@suratmunicipal.org, Collector Surat <collector-sur@gujarat.gov.in>  
Cc: Mr AASHISH <aashish.28@gov.in>, Rahul Kumar <rahul.kr92@gov.in>, dinesh.kapila@gov.in, support@sbmurban.org, GPCB RO Surat <ro-gpcb-sura@gujarat.gov.in>

**To,****Shri Shrinivas R Katikithala IAS**

Secretary MoHUA. New Delhi.

**Mr. Tanmay Kumar IAS**

Secretary MoEFCC New Delhi.

**Ms Roopa Mishra IAS**

Joint Secretary SBM. New Delhi.

**Binay Kumar Jha. Director**

(SBM-III &amp; PHE) New Delhi.

**Dr. V. K. Chaurasia. IAS**

Joint Adviser (PHEE) New Delhi.

**Smt. K. Sravanthi Jeevan**

Asst. Adviser (PHE) CPHEEO, MoHUA New Delhi.

**Sh. Amandeep Garg, IAS**

Chairman CPCB. Delhi. and Addl Secretary. MoEFCC.

TRUE COPY

**Mr. NARESH PAL GANGWAR. IAS**

Addl Secretary MOEFCC New Delhi.

**Shri Ashwini Kumar (IAS)**

Principal Secretary (UD &UHD) Gandhinagar.

**Shri Sanjeev Kumar. IAS**

Principal Secretary Forest & Environment Department. Gandhinagar.

**Shri R.B. Barad (Retd IAS)**

Chairman. Gujarat Pollution Control Board. Gandhinagar.

**Shri D. M. Thaker**

Director Environment Gandhinagar.

**Smt. Shalini Agarwal. IAS**

Municipal Commissioner SMC Surat.

**Dr Sourabh Pardhi. IAS**

Collector & District Magistrate Surat.

**Respected Sir,**

BWRC have been working for conservation of environment and pollution abatement from 2003. We have filed a case against Surat Municipal Corporation in NGT wide case no OA 81/2014 WZ Pune for violation of SWM Rules and pollution from the Municipal Solid Waste Disposal Site at Khajod Surat. There were regular fire incidents in the MSW site and raw waste was dumped in the MSW site without treatment. Heavy smell in winter and water pollution was also there in monsoon. The site had few lac tonnes of raw MSW dump till 2013 without any kind of treatment. Health issues also arose due to open burning and pollution. Due to pollution issues, we were forced to approach NGT in public interest as GPCB had failed to control the pollution in 2014. We had asked compensation for the local villagers and remediation of Khajod site with other parties.

The SMC was forced to make an action plan by NGT and SWM Rules compliance was ordered from time to time to SMC. NGT has taken serious note of the violation of environmental norms. The NGT case was disposed of by providing direction to a committee of UDD Gujarat to look into the pollution aspect of this site and action plan compliance. Appeal in the Supreme court was filed and SC has restored the case into NGT WZ clearly directing that any such executive committee formed by NGT cannot look after the case in absence of clear-cut NGT judicial order in the entire issue.

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After the NGT case SMC has only capped the raw dump yard and solved the legacy 40 lac tonnes waste issue. After the Hon Supreme Court judgement and restoration of case in NGT SMC has now failed to comply with the S.W. Rules 2016 at site and pollution continued at Khajod disposal site.

We raise the following legal, technical and environmental pollution issues of the SMC MSW site.

1. There was very less and poor MSW segregation taking place in the MSW Khajod site for a long time. Apart from the total 3000 TPD MSW acceptance at this site, there is almost negligible amount of solid waste recovery observed. The SMC dumps raw waste in open inside the Khajod MSW. Due to continuous raw MSW disposal on open land there is a new 10.5-hectare open illegal dump created violating the SW Rules in the Southern portion beside Cell no 2. GPCB has totally failed to observe this growing illegal dump yard and mountain of waste between 2020-2025. Time series Google (**Images 1 to 5**) and Google earth image of present illegal dumping (**Images 6**) and Geotagged photographs (**Images 7 to 9**) are attached as evidence for your kind information and action. **As per our estimation in the last 5 years there are approx. 8.0 Lac tonnes of raw MSW is stored in 10.5 Ha which has become legacy waste now during the pendency of the NGT case !!!!!** This is a clear cut violation of SWM rule and action must be taken by GPCB/CPCB.
2. This newly built raw Municipal Solid Waste open dump and mountain is in violation of NGT Order in our case 81/2014 and action plan prepared by SMC. SMC has paid no attention and presently the illegal dump yard is under operation and raw MSW without any kind of treatment is directly dumped in this area by SMC. GoG and GPCB should take serious note of this.
3. The SMC has closed SLF Cell no 2 and partially operates 1, 1A but they have failed to monitor the Leachate generation and collection mechanism for these MSW SLF Cells. The Leachate collection and its treatment in SMC STP is on paper. The video is attached (**Video-1**) as evidence showing emission of gas bubbles in the ponding water inside MSW SLF Cell 1-1A. This proves that leachate collection is not functioning. Another video also shows the direct partially treated MSW is dumped through trucks in this cell instead of inert materials which are supposed to be segregated and recovered. (**Video -2**). (**Image-10**)
4. Heavy smell is erupting due to accumulation of water into SLF Cell 1-1A and illegal 10.55 Ha dumping site. Sulphide and ammonia like gases erupt in presence of water from this open dump due to organic waste degradation and spread into the city in wind direction. The partially treated waste worsens the situation by triggering generation of more gases. We most respectfully invite you to please visit the site and feel the very bad odour and harmful gases which citizens of Surat are constantly inhaling. There have been a number of complaints regarding foul odour in this area to GPCB but actions are missing. (**Image 11-13**). In absence of leachate collection the leachate finds its way into natural drain from MSW plant.

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5. There is cross verification needed of waste processing as per SWM Rules taken place in Khajod MSW Site between last 3 years with electricity bills of contractors and sale of recovered materials. There are only show offs and hardly 30-40% of processing takes place through trommels. The waste segregation is questionable as no recovery is observed in stock. The recovered material does not meet the recovery criteria and cannot be sold so this material is dumped in the name of inert into the SLF and illegally disposed of into nature and nearby areas illegally.

6. There is very poor treatment of MSW carried out in this Khajod MSW. The recovered materials have not been sold to the parties in the last so many years. We demand 6 months of data evaluation and revenue generation through its sale. The contractors have been generating fabricating documents and providing fake data to mislead SMC and SMC does nothing. At the same time controller and regulator GPCB does not evaluate these factual things while regular MSW visits. As a party in NGT Case OA 81/2014, we officially demand to provide us last 6 months GST invoice bills for the selling of all kind recovered materials like Compost, Plastic Waste, C&D waste, RDF, E-waste etc from SBM Portal for the SMC MSW Site. **Requesting SMC/SBM to provide the GST bills of such recovered materials in soft format from the portal.**

7. The contractors of this SMC MSW site have disposed of raw MSW in neighbouring Bharuch district also and an FIR has also been filed against SMC contractor. There were so many complaints of such illegal MSW dumping from MSW Khajod through its contractors. SMC has failed to observe and stop these illegalities by contractors. Imagine how MSW of Surat is transported 70 KMS away for illegal disposal in open farms and in remote areas in Bharuch dist.

8. Due to the old dumping and presently raw MSW dumping in open land, the ground water quality has deteriorated. **We demand tri party joint sampling with us along with GPCB, CPCB to verify our allegation of ground water contamination in this Khajod MSW Site.**

9. **We demand to carry out financial auditing of the SMC Khajod MSW site waste processing facilities** as GOI and GoG have paid huge amounts of public money to SMC. Open dump in 10.5 ha with 8.0 lac tonnes is telling all is not well in this MSW Site. There is a need for carrying out a financial audit which can estimate the true efficiency of the processing plants and compliance of solid waste rules. Technical evaluation is done only on record and data provided by SMC and its contractors and most of the Govt authority believes it true. Even GPCB accepts the SMC data and does nothing. **Thus, a financial audit must be carried out by SBM for this site.**

10. There are open raw MSW burning taking place in this Khajod MSW Disposal site. We are providing photos of the fire in MSW Khajod Site. **(Images 14 to 17)** There are MSW burning reported in the Bhatar solid waste dump yard. Video is attached showing open burning of MSW. **(Images 18-19 and google drive link)** The SMC has yet not cleared the raw MSW dumped at Bhatar site. The slums have come up in 1.38 ha area of MSW dump and no remediation has been done. **(Image-20)**

TRUE COPY

11. The SMC has remediated the legacy dump but the methane generated from this dump is spreading all over the site and in surroundings. Most of the Air Conditioners are corroding in just 3-4 years due to the methane gas. SMC has failed to plan the utilisation of Methane gas while remediation of legacy dump. After executing the capping of this legacy waste all methane vents left open. We demand to utilise the generated methane from all SLF Cells and remediated dump. Very huge 113 tons/day methane is being released as GHG into the atmosphere from this site which is a remarkable quantity and needs the attention of MOEFCC. (Source IIRS- ISRO)

We are drawing your kind attention on these above-mentioned issues of Municipal Solid Waste Disposal and illegalities being carried out in Khajod Disposal Plant for necessary action and improvement in system along with strict monitoring and compliance of all the SWM Rules to minimise the air water and soil pollution at site and in surrounding.

We would also like to draw your kind attention that beside this MSW site the world class DREAM CITY, SURAT DIAMOND BOURSE and SURAT METRO Yard are established and the negative impacts of this MSW plant and its pollution can further affect these mega projects and development. The methane gas as corrosive in nature is affecting the life of building and electrical systems of these projects. Residents of the area are complaining about the AC failure due to high corrosion. These violations are definitely having some health impact over humans and impact over the local environment.

In this grim situation and ongoing NGT case it is highly required action against SMC by GPCB, CPCB, UDD, SBM, MOUHA and MOEFCC and force the SMC to comply with the environmental norms and laws.

Thanking you and hoping for your positive action to stop the pollution of Khajod SMC MSW site.

**Yours Faithfully**

**M.S.H. SHEIKH**

**President BWRC and applicant of NGT WZ OA 81/2014.**

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[https://drive.google.com/file/d/1RB2FRhcqE5IVzb195u2uZW\\_C0-0hv1Cr/view?usp=sharing](https://drive.google.com/file/d/1RB2FRhcqE5IVzb195u2uZW_C0-0hv1Cr/view?usp=sharing)

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#### 5 attachments

 **ANNEXURES SMC MSW SURAT.pdf**  
4040K

 **13-1-2025 khajod.mp4**  
3815K

 **13 -1- 2025 khajod msw.mp4**  
5702K

 **Video-1 Gas generation and no leachate collection inside SLF Cell 1-1A.mp4**  
2213K

TRUE COPY

 **Video 2 Partially treated MSW dumping work inside SLF 1-1A.mp4**  
3650K

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Time series photography of illegal open dumping in 10.55 hectare area inside MSW Khajod by SMC

Image: 1



Image: 2

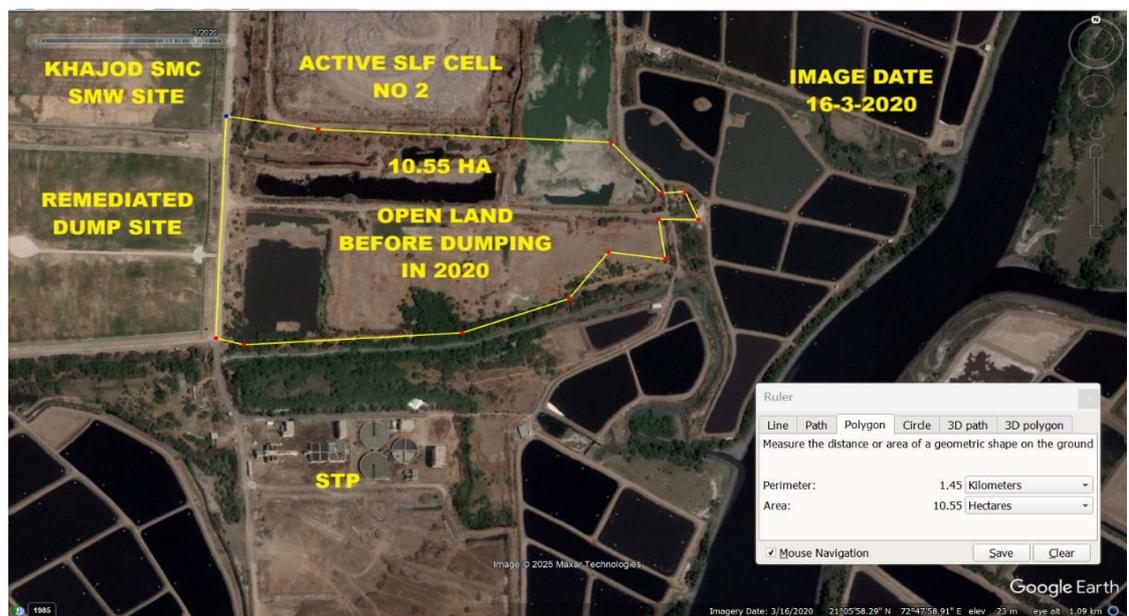
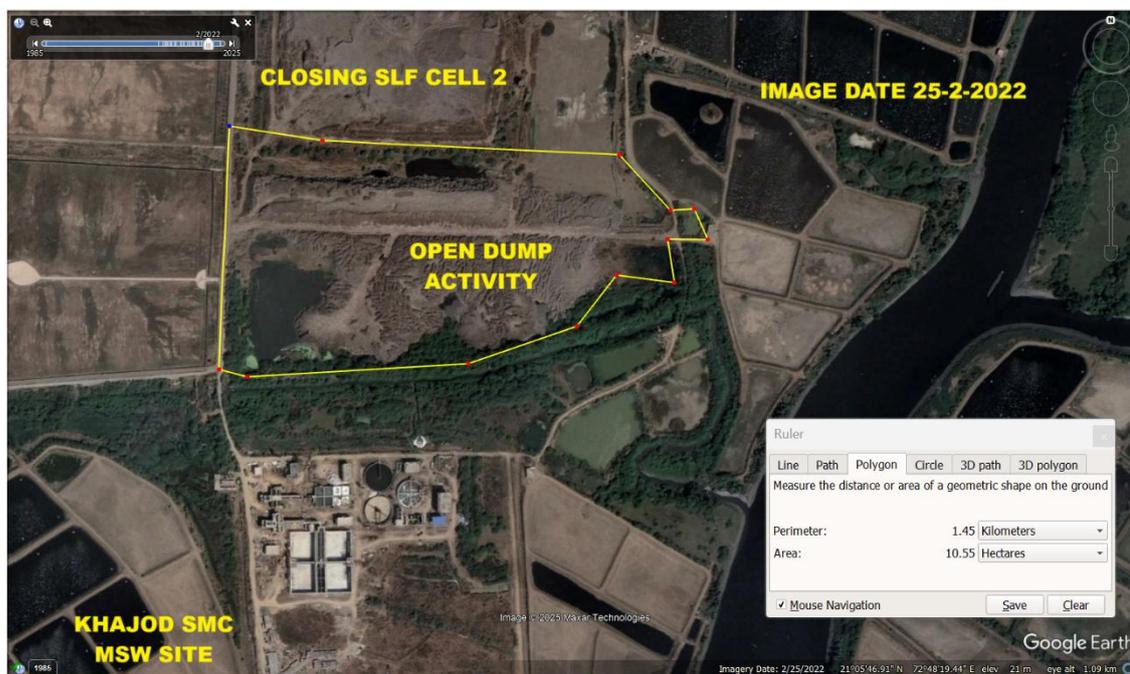
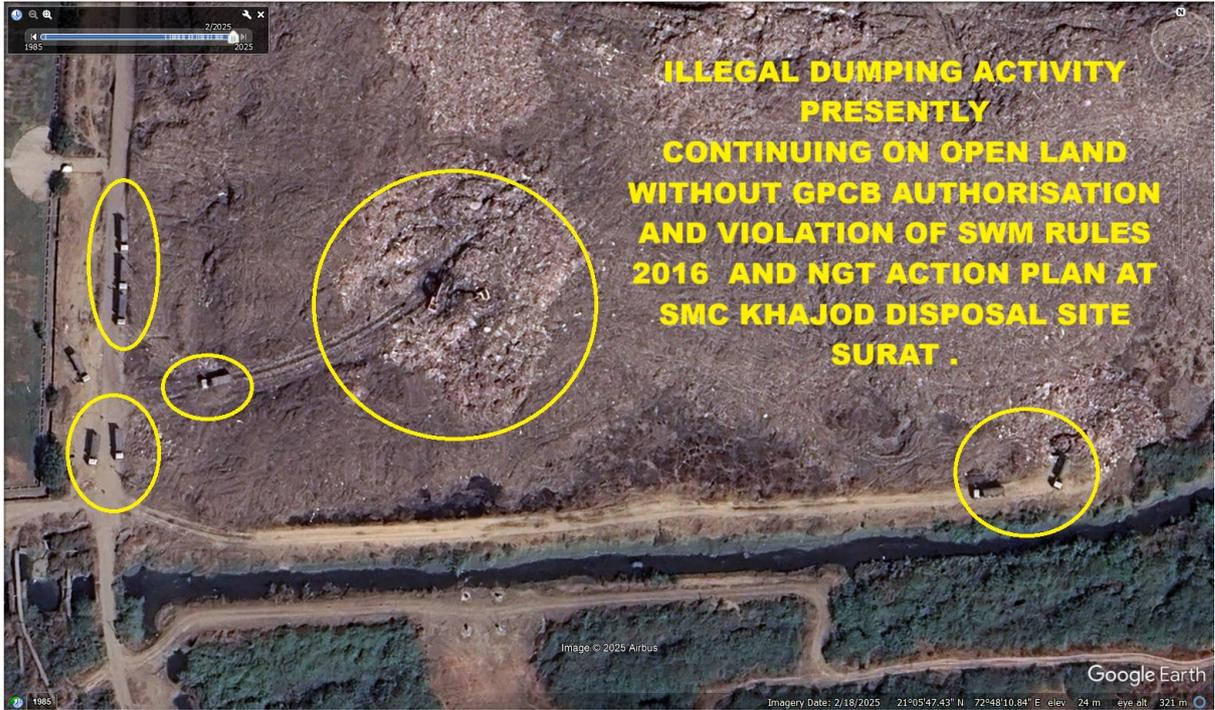


Image: 3



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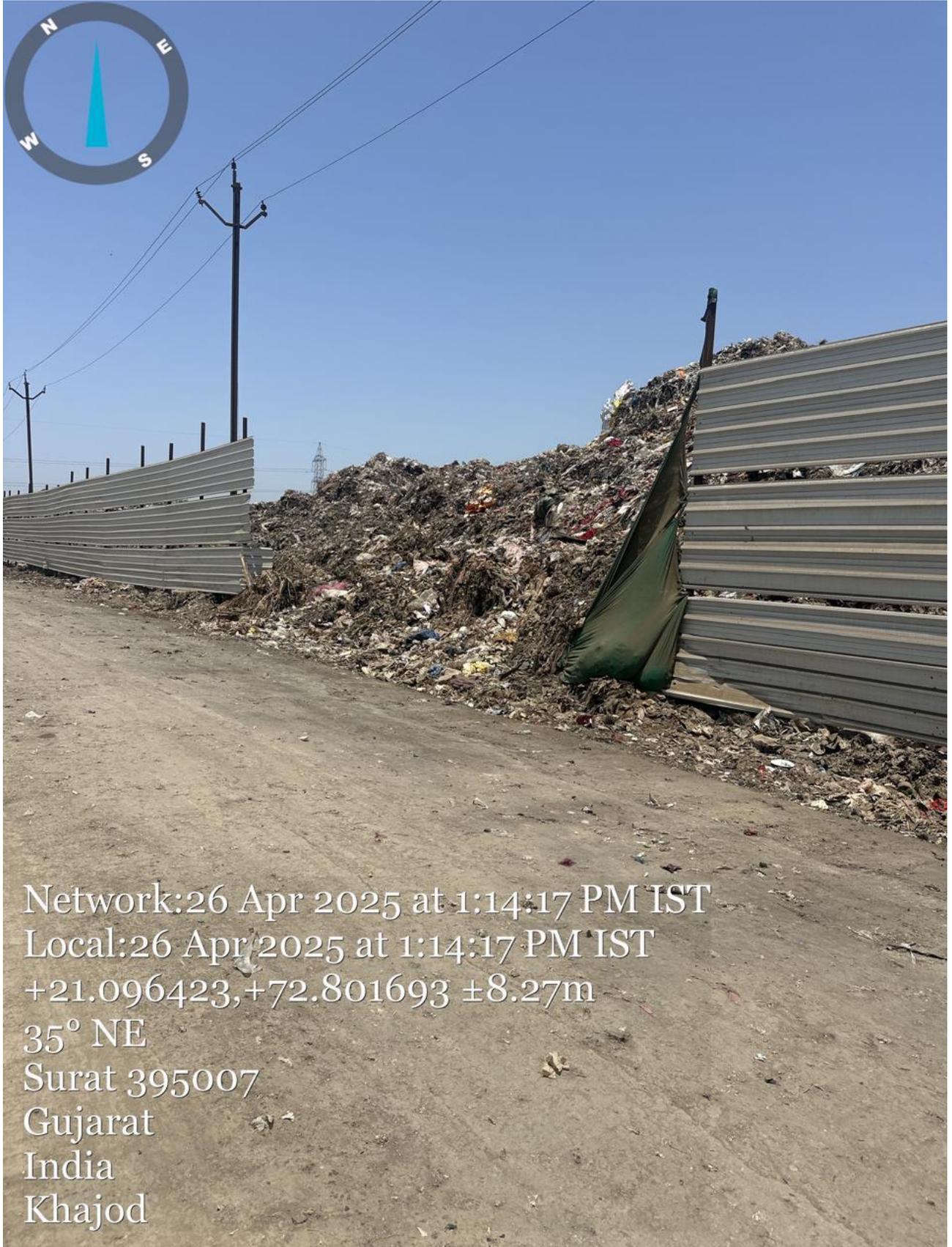


**Image: 4**



**Image: 5**

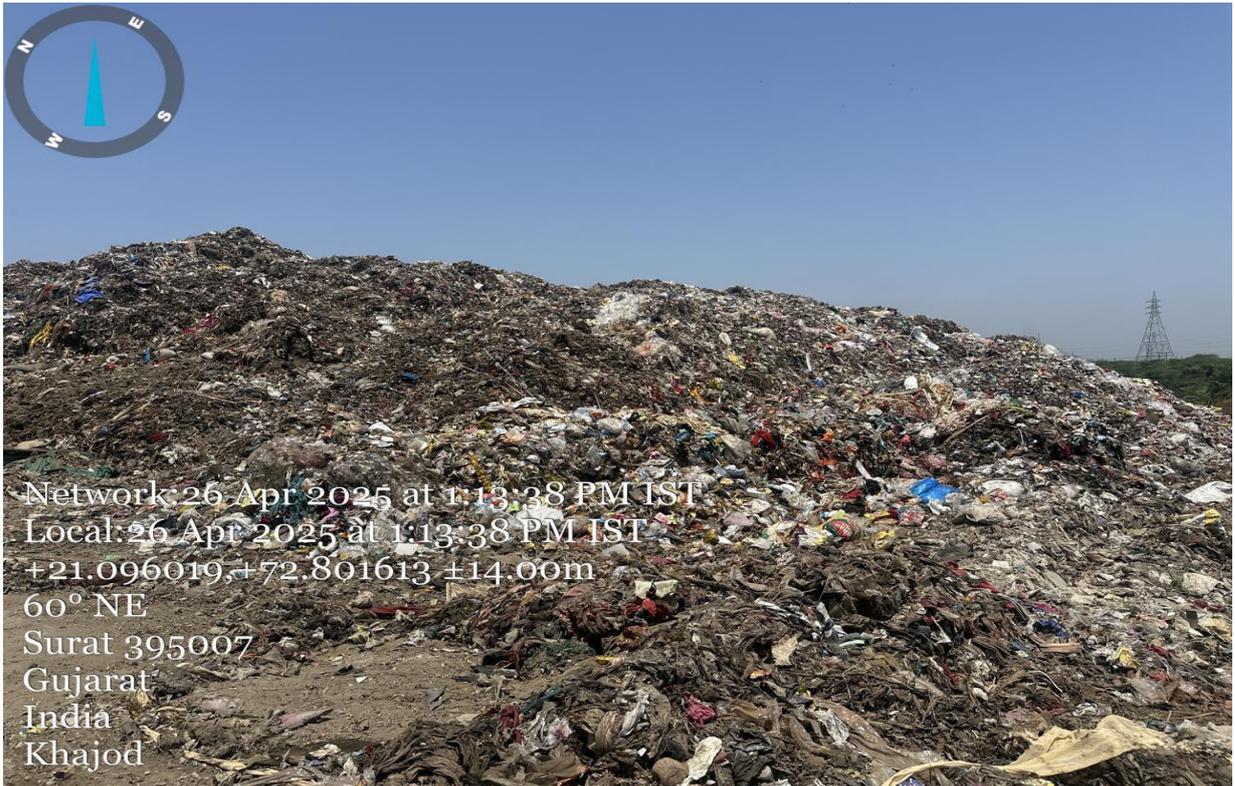
**Raw MSW dumping on 10.55 Ha illegal storage in southern portion of MSW Khajod.**



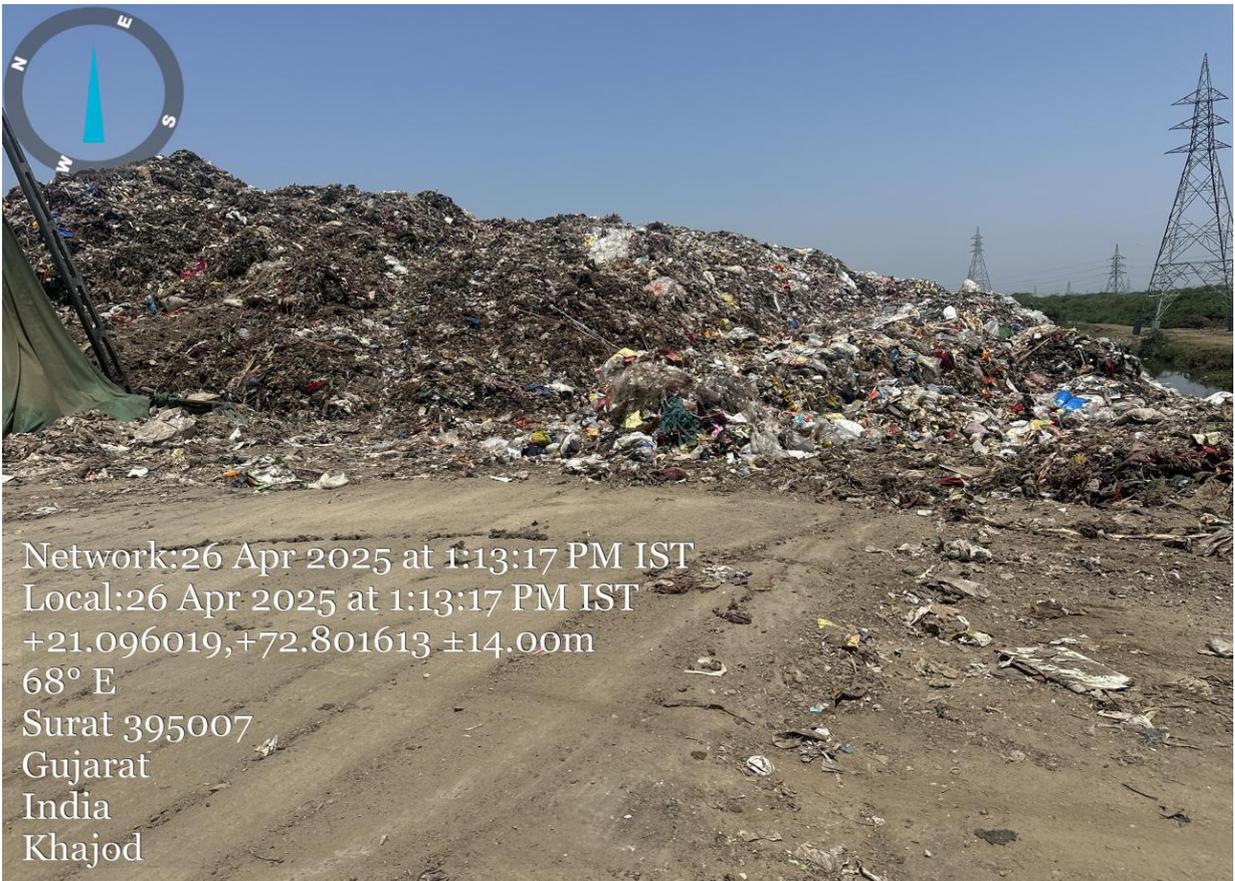
**Image: 6**

**Raw MSW dumping on 10.55 Ha illegal storage in southern portion  
of MSW Khajod**

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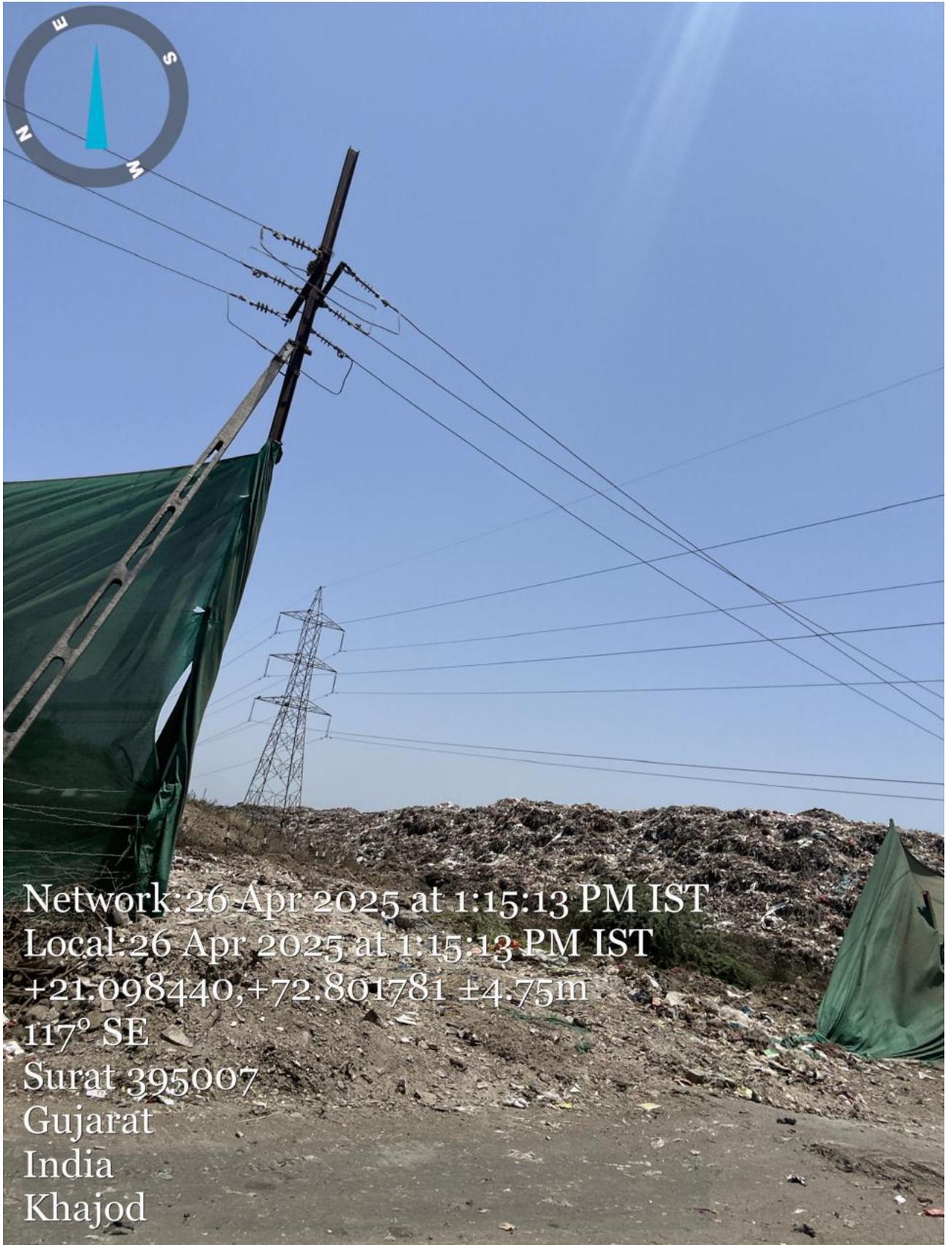


**Image: 7**



**Image: 8**

**Raw MSW dumping on 10.55 Ha illegal storage in southern portion  
of MSW Khajod  
TRUE COPY**



**Image: 9**

**Raw MSW dumping height of 15-20 meter on 10.55 Ha illegal storage in southern portion of MSW Khajod. Industrial association has complained MSW site is causing Power disturbances in Sachin GIDC due to flying MSW objects and short circuits.**

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**Image: 10**

SLF Cell no 1 and 1A is not receiving inert material but receives partly treated MSW. 1892  
Plastic waste, Chindi and other waste can be easily seen in SLF.



**Image: 11**

Leachate accumulation inside the SLF goes in to surrounding environment.



Image: 12

Waste dumping with plastic can be easily observed in SLF Cell 1, 1A  
in SLF of SMC MSW Khajod Site.

**Can we call this waste inert material fit for SLF disposal?**



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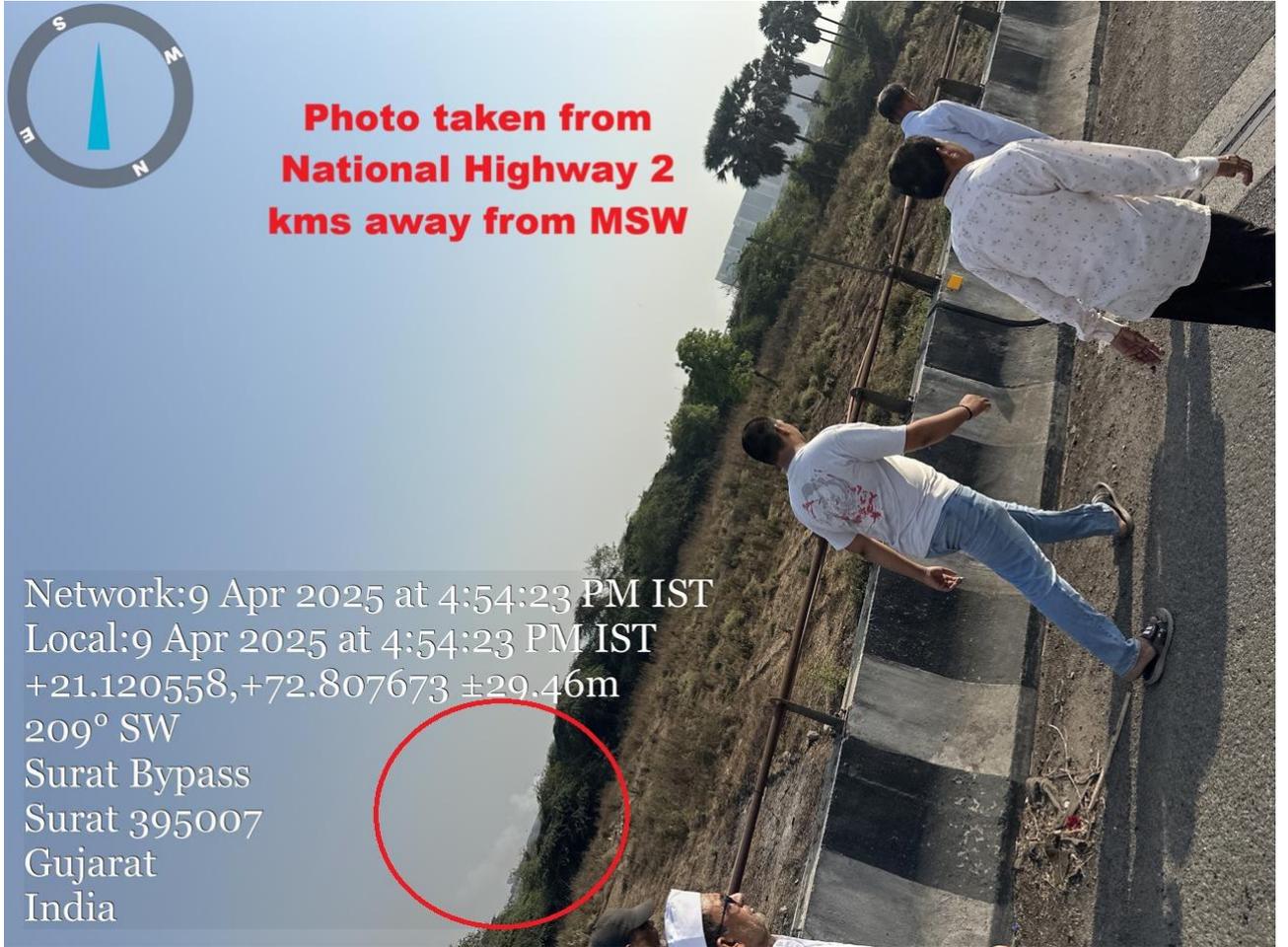
**Image: 13**

**SLF Cell 1 -1A having water shows no leachate collection inside cells.**



Image: 14

Fire in Khajod MSW site on 9-4-2025



TRUE COPY



**Image: 15-16-17**

**13-1-2025 MSW burning in Khajod MSW site of SMC.**

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**Image: 18**

**24-3-2025 Bhatar MSW site burning.**



**Officially this site is closed.**

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**Image: 19**



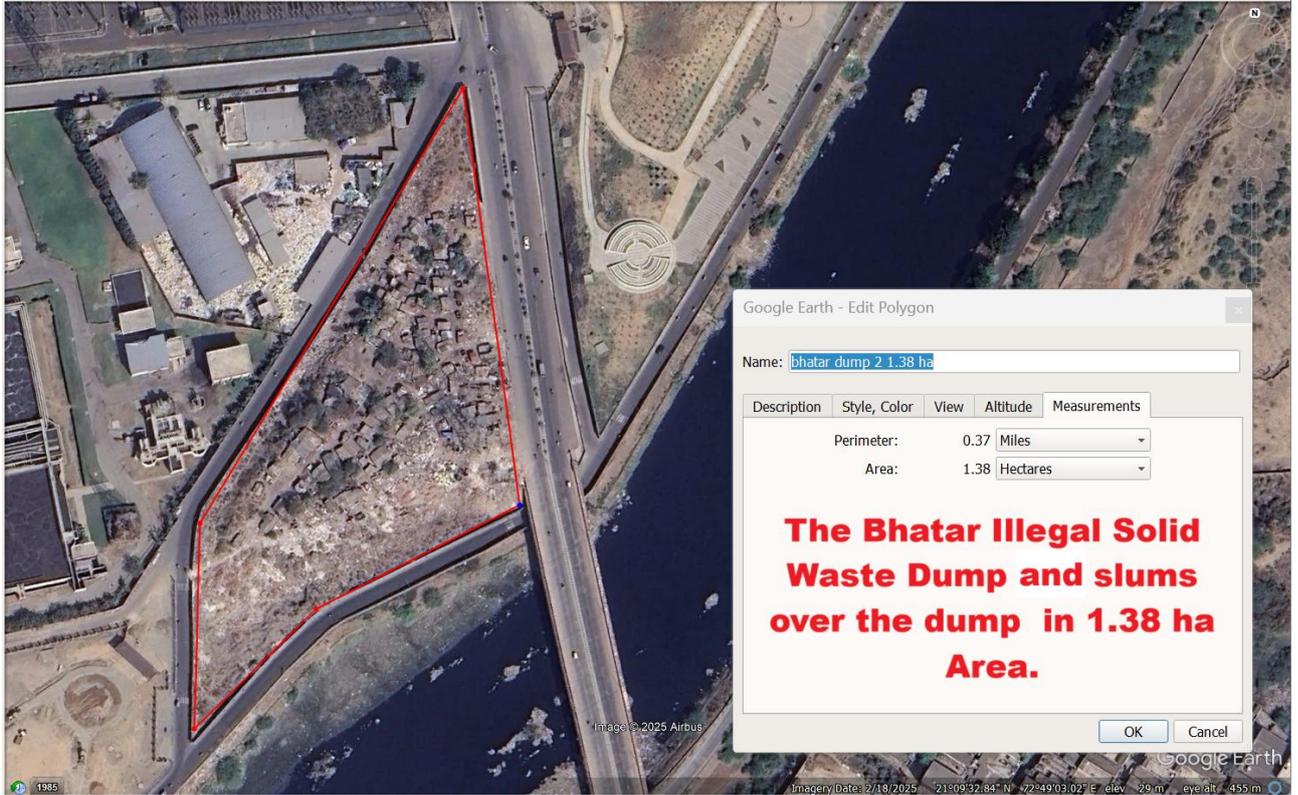
**24-3-2025 Bhatar MSW Site fire continued during night hours.**

**Officially this site is closed...**

**TRUE COPY**

**Image: 20**

**Bhatar old MSW dump site is not remediated and slum over the MSW legacy dump can be seen.**



TRUE COPY

# **Brackish Water Research Centre**

Date: 15<sup>th</sup> MAY 2025.

**Letter No: 9/env/2025**

**By mail**

To,

**Shri Shrinivas R Katikithala IAS**  
Secretary MoHUA. New Delhi.

**Mr. Tanmay Kumar IAS**  
Secretary MoEFCC New Delhi.

**Ms Roopa Mishra IAS**  
Joint Secretary SBM. New Delhi.

**Sh. Amandeep Garg, IAS**  
Chairman CPCB. Delhi. and Addl Secretary. MoEFCC.

**Shri Ashwini Kumar (IAS)**  
Principal Secretary (UD &UHD) Gandhinagar.

**Shri Sanjeev Kumar. IAS**  
Principal Secretary Forest & Environment Department. Gandhinagar.

**Shri R.B. Barad (Retd IAS)**  
Chairman. Gujarat Pollution Control Board. Gandhinagar.

**Shri D. M. Thaker**  
Director, Environment Gandhinagar.

**Smt. Shalini Agarwal. IAS**  
Municipal Commissioner SMC Surat.

**Dr Sourabh Pardhi. IAS**  
Collector & District Magistrate Surat.

**Sub: Reminder-1 About irregularities and illegalities in Municipal Solid Waste Disposal by Surat Municipal Corporation and action to stop pollution risking public health.**

**Reference:** *Our earlier email representations dated 27-4-2025 with videos and photos of SMC MSW Site.*

---

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---

**Respected Sir,**

BWRC have been working for conservation of environment and pollution abatement from 2003. We have filed a case against Surat Municipal Corporation in NGT wide case no OA 81/2014 WZ Pune for violation of SWM Rules and pollution from the Municipal Solid Waste Disposal Site at Khajod Surat. There were regular fire incidents in the MSW site and raw waste was dumped in the MSW site without treatment. Heavy smell in winter and water pollution was also there in monsoon. The site had few lac tonnes of raw MSW dump till 2013 without any kind of treatment. Health issues also arose due to open burning and pollution. Due to pollution issues, we were forced to approach NGT in public interest as GPCB had failed to control the pollution in 2014. We had asked compensation for the local villagers and remediation of Khajod site with other parties.

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After the NGT case SMC has only capped the raw dump yard and solved the legacy 40 lac tonnes waste issue. After the Hon Supreme Court judgement and restoration of case in NGT SMC has now failed to comply with the S.W. Rules 2016 at site and pollution continued at Khajod disposal site.

We raise the following legal, technical, and environmental pollution related issues of the SMC MSW site.

1. There was very less and poor MSW segregation taking place in the MSW Khajod site for a long time. Apart from the total 3000 TPD MSW acceptance at this site, there is almost negligible amount of solid waste recovery observed. The SMC dumps raw waste in open inside the Khajod MSW. Due to continuous raw MSW disposal on open land there is a new 10.5-hectare open illegal dump created violating the SW Rules in the Southern portion beside Cell no 2. GPCB has

totally failed to observe this growing illegal dump yard and mountain of waste between 2020-2025. Time series Google and Google earth image of present illegal dumping can be easily seen by all authorities. **As per our estimation in the last 5 years there are approx. 8.0 Lac tonnes of raw MSW is stored in 10.5 Ha which has become legacy waste now during the pendency of the NGT case !!!!!** This is a clear cut violation of SWM rule and action must be taken by GPCB/CPCB.

2. This newly built raw Municipal Solid Waste open dump and mountain is in violation of NGT Order in our case 81/2014 and action plan prepared by SMC. SMC has paid no attention and presently the illegal dump yard is under operation and raw MSW without any kind of treatment is directly dumped in this area by SMC. GoG and GPCB should take serious note of this.
3. The SMC has closed SLF Cell no 2 and partially operates 1, 1A but they have failed to monitor the Leachate generation and collection mechanism for these MSW SLF Cells. The Leachate collection and its treatment in SMC STP is on paper. There is emission of gas visible as bubbles in the ponding water inside MSW SLF Cell 1-1A. This proves that leachate collection is not functioning. SMC is dumping partially treated MSW through trucks in this cell instead of inert materials which are supposed to be segregated and recovered.
4. Heavy smell is erupting due to accumulation of water into SLF Cell 1-1A and illegal 10.55 Ha dumping site. Sulphide and ammonia like gases erupt in presence of water from this open dump due to organic waste degradation and spread into the city in wind direction. The partially treated waste worsens the situation by triggering generation of more gases. We most respectfully invite you to please visit the site and feel the very bad odour and harmful gases which citizens of Surat are constantly inhaling. There have been a number of complaints regarding foul odour in this area to GPCB but actions are missing. In absence of leachate collection, the leachate finds its way into natural drain from MSW plant.
5. There is cross verification needed of waste processing as per SWM Rules taken place in Khajod MSW Site between last 3 years with electricity bills of contractors and sale of recovered materials. There are only show offs and hardly 30-40% of processing takes place through trommels. The waste segregation is questionable as no recovery is observed in stock. The recovered material does

not meet the recovery criteria and cannot be sold so this material is dumped in the name of inert into the SLF and illegally disposed of into nature and nearby areas illegally.

6. There is very poor treatment of MSW carried out in this Khajod MSW. The recovered materials have not been sold to the parties in the last so many years. We demand 6 months of data evaluation and revenue generation through its sale. The contractors have been generating fabricating documents and providing fake data to mislead SMC and SMC does nothing. At the same time controller and regulator GPCB does not evaluate these factual things while regular MSW visits. As a party in NGT Case OA 81/2014, we officially demand to provide us last 6 months GST invoice bills for the selling of all kind recovered materials like Compost, Plastic Waste, C&D waste, RDF, E-waste etc from SBM Portal for the SMC MSW Site. **Requesting SMC/SBM to provide the GST bills of such recovered materials in soft format from the portal.**
7. The contractors of this SMC MSW site have disposed of raw MSW in neighbouring Bharuch district also and an FIR has also been filed against SMC contractor. There were so many complaints of such illegal MSW dumping from MSW Khajod through its contractors. SMC has failed to observe and stop these illegalities by contractors. Imagine how MSW of Surat is transported 70 KMS away for illegal disposal in open farms and in remote areas in Bharuch dist.
8. Due to the old dumping and presently raw MSW dumping in open land, the ground water quality has deteriorated. **We demand tri party joint sampling with us along with GPCB, CPCB to verify our allegation of ground water contamination in this Khajod MSW Site.**
9. **We demand to carry out financial auditing of the SMC Khajod MSW site waste processing facilities** as GOI and GoG have paid huge amounts of public money to SMC. Open dump in 10.5 ha with 8.0 lac tonnes is telling all is not well in this MSW Site. There is a need for carrying out a financial audit which can estimate the true efficiency of the processing plants and compliance of solid waste rules. Technical evaluation is done only on record and data provided by SMC and its contractors and most of the Govt authority believes it true. Even GPCB accepts the SMC data and does nothing. **Thus, a financial audit must be carried out by SBM for this site.**

10. There are open raw MSW burning taking place in this Khajod MSW Disposal site. We are providing photos of the fire in MSW Khajod Site. There are MSW burning reported in the Bhatar solid waste dump yard. The SMC has yet not cleared the raw MSW dumped at Bhatar site. The slums have come up in 1.38 ha area of MSW dump and no remediation has been done.
11. The SMC has remediated the legacy dump but the methane generated from this dump is spreading all over the site and in surroundings. Most of the Air Conditioners are corroding in just 3-4 years due to the methane gas. SMC has failed to plan the utilisation of Methane gas while remediation of legacy dump. After executing the capping of this legacy waste all methane vents left open. We demand to utilise the generated methane from all SLF Cells and remediated dump. Very huge 113 tons/day methane is being released as GHG into the atmosphere from this site which is a remarkable quantity and needs the attention of MOEFCC. (Source IIRS- ISRO)

We are drawing your kind attention on these above-mentioned issues of Municipal Solid Waste Disposal and illegalities being carried out in Khajod Disposal Plant for necessary action and improvement in system along with strict monitoring and compliance of all the SWM Rules to minimise the air water and soil pollution at site and in surrounding.

We would also like to draw your kind attention that beside this MSW site the world class DREAM CITY, SURAT DIAMOND BOURSE and SURAT METRO Yard are established and the negative impacts of this MSW plant and its pollution can further affect these mega projects and development. The methane gas as corrosive in nature is affecting the life of building and electrical systems of these projects. Residents of the area are complaining about the AC failure due to high corrosion. These violations are definitely having some health impact over humans and impact over the local environment.

In this grim situation and ongoing NGT case by this second letter, we once again demand action against SMC by GPCB, CPCB, UDD, SBM, MOUHA and MOEFCC and force the SMC to comply with the environmental norms and laws.

Thanking you and hoping for your positive action to stop the pollution of Khajod SMC MSW site.

TRUE COPY

**Yours Faithfully**

  
M. S. H. SHEIKH

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**M.S.H. SHEIKH**

President

Ph: 9825546017

TRUE COPY



M.S.H. SHEIKH &lt;2mshsheikh@gmail.com&gt;

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**About SMC MSW disposal site pollution and violation of SWM Rules.**

1 message

**M.S.H. SHEIKH** <2mshsheikh@gmail.com>

Thu, May 15, 2025 at 4:55 PM

To: secyurban@nic.in, Secretary MOEFCC <secy-moef@nic.in>, rmishra77@nic.in, ccb.cpcb@nic.in, securban@gujarat.gov.in, Principal Secretary DOEF <secfed@gujarat.gov.in>, Chairman GPCB <chairman-gpcb@gujarat.gov.in>, Director Environment <direnv@gujarat.gov.in>, commissioner@suratmunicipal.org, Collector Surat <collector-sur@gujarat.gov.in>

Cc: GPCB RO Surat <ro-gpcb-sura@gujarat.gov.in>, CPCB RD Vadodara <arvindjha.cpcb@nic.in>

Dear sir

PFA the PDF file for representation for action.

**Yours Faithfully****M.S.H. SHEIKH**  
**President BWRC.**

KASBA MOHALLA MOUGAL STREET AT POST OLPAD 394540 DIST SURAT

PH 98255 46017

**DS 9 env 25 MSW Khajod Surat.pdf**

320K

TRUE COPY



M.S.H. SHEIKH &lt;2mshsheikh@gmail.com&gt;

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**About carrying out joint sampling of Ground Water and Surface water from SMC MSW disposal site for pollution.**

1 message

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**M.S.H. SHEIKH** <2mshsheikh@gmail.com>

Tue, May 27, 2025 at 2:52 PM

To: GPCB RO Surat &lt;ro-gpcb-sura@gujarat.gov.in&gt;

Cc: Chairman GPCB &lt;chairman-gpcb@gujarat.gov.in&gt;, Member Secretary GPCB &lt;ms-gpcb@gujarat.gov.in&gt;

Respected Sir

In regard to our earlier mail, letter No 9 env 2025 and NGT Case for MSW Khajod Surat, We have demanded for a joint sampling of Ground Water and Surface Water/Leachate from Khajod MSW Site.

We would like to request RO GPCB to provide suitable date for joint sampling of GW/SW/Leachate and intimate us in advance.

Hoping for your positive cooperation.

**Yours Faithfully****M.S.H. SHEIKH****President BWRC.**

KASBA MOHALLA MOUGAL STREET AT POST OLPAD 394540 DIST SURAT

PH 98255 46017

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