

BOOK NO. -04-  
PAGE NO. -173-  
SR. NO. 585-  
DATE 08/12/2025  
NILESH R. PANDYA  
NOTARY  
GOVT. OF INDIA  
8 DEC 2025

BEFORE THE NATIONAL GREEN  
TRIBUNAL  
WESTERN ZONE BENCH, PUNE

ORIGINAL APPLICATION NO. 134 OF 2025 (WZ)

IN THE MATTER OF:

RATHOD GULABSINH HARISANG AND  
OTHERS

... APPLICANT

VERSUS

UNION OF INDIA & ORS.

... RESPONDENTS

**AFFIDAVIT ON BEHALF OF GUJARAT POLLUTION  
CONTROL BOARD**

I M. R. Macwana, adult, having my office at Gujarat Pollution Control Board, Gandhinagar, do hereby solemnly affirm and state an oath as under:

1. I am presently serving as Senior Environmental Engineer with Gujarat Pollution Control Board. I have perused the record pertaining to the case available in my office and am conversant with the facts of the case. I am authorized to swear the present affidavit on behalf of the Gujarat Pollution Control Board and am otherwise competent to make the present affidavit.
2. I am filing the present affidavit in compliance with order dated 14.11.2025 passed by this Hon'ble Tribunal.



3. The present application has been filed complaining violation of environmental laws by Respondent No.12- M/s. Ashapura Perfoclay Limited, which is located at Survey No. 167, Village: Ler, Near Bhujodi, Anjar Bhuj Highway, Taluka Bhuj, District: Kutch, and operating a Bleaching Clay Manufacturing Plant with a production capacity of Bentonite (Throughput) 0.156 MTPA and Bleaching Clay 0.144 MTPA. The application also alleges inaction on the part of the State Pollution Control Board.
4. The application to the extent it highlights some non-compliances by the project proponent is true and not denied. However, the version of the applicant that the State Pollution Control Board has failed to take any legal action or that it has been derelict in performance of its statutory duty is false and denied. The contemporaneous record shows that the State Pollution Control Board has been alive to its statutory obligations and has been taking all necessary actions warranted by the facts in accordance with law.
5. I say that based on the complaints received from the applicant an inspection was carried out by the Board on 27.02.2025 wherein the following violations were observed:
- *Gypsum stored in open area near natural seasonal water drain;*
  - *Dust deposition on agricultural crops;*
  - *Fugitive emission in plant and internal roads; and*
  - *New HAG with dryer installed without CTE/CCA approval.*

A copy of detailed inspection report dated 27.02.2025 is annexed herewith and marked as **Annexure R-1**.



6. Observing the non-compliances, a show-cause notice dated 26.06.2025 was issued to Respondent No. 12 calling upon it to produce documentary evidence as well as an action taken report specifying the steps taken for remediation of the above-mentioned violations, failing which it was informed that action shall be initiated in accordance with provisions of Air Pollution (Prevention and Control) Act, 1981. A copy of show-cause notice dated 26.06.2025 is annexed herewith and marked as **Annexure R-2**. Pursuant thereto an inspection was again conducted by the Board on 23.07.2025. During the said inspection all identified violations were cured by Respondent No. 12 in compliance with the show-cause notice dated 16.06.2025 and no other violations were observed by the Board. A copy of inspection report dated 23.07.2025 is annexed herewith and marked as **Annexure R-3**.



7. I say that another complaint was received from the applicant regarding pollution being caused by Respondent No. 12 due to its industrial operations. The Board conducted another inspection on 10.10.2025 and found the similar violations as were seen in the inspection conducted on 27.02.2025. A copy of the inspection report dated 10.10.2025 is annexed herewith and marked as **Annexure R-4**. Basis the inspection conducted on 10.10.2025, another show-cause notice came to be issued to respondent no. 12 wherein apart from the non-compliances seen earlier, it was also mentioned that the unit has installed a new Hot Air Generator with dryer without obtaining any Consent to Establish or Consolidated Consent and Authorization of the Board. A copy of the show-cause notice dated 10.10.2025 is annexed herewith and marked as **Annexure R-5**.

8. I say that on 02.12.2025, the Board conducted an inspection for monitoring the compliance of violations mentioned in the

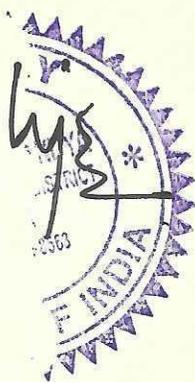
A handwritten signature in blue ink, appearing to be 'S. Singh' or similar, located at the bottom center of the page.

show-cause notice dated 10.10.2025. During the visit almost all violations identified by the Board were found to be complied with. The unit also informed that it has made an application for amendment of Consent to Establish vide inward no. 422241 with respect to the new Hot Air Generator with dryer. A copy of inspection report dated 02.12.2025 is annexed herewith and marked as **Annexure R-6**.

9. I submit that the aforesaid facts, duly supported by contemporaneous material, clearly show that the State Pollution Control Board has taken cognizance of complaints from the applicants and other persons, and taken prompt action against the project proponent. The Board has ensured that all non-compliances are remedied and the project proponent becomes fully compliant to the conditions imposed by the Board and otherwise adheres to the environmental laws.

10. The other issue concerns industrial operations by the project proponent from Survey No. 166 and 168 while possessing a valid environmental clearance for operating the industrial unit from Survey No. 167. The unit has informed that it proposes to make an application for amendment in the environmental clearance but has not been able to upload the application on the PARIVESH portal due to some technical issue. The State Pollution Control Board is not directly concerned with the aspect of amendment of environmental clearance, and the same shall be suitably addressed by the concerned authority i.e. the State Environmental Impact Assessment Authority.

11. I assure that the State Pollution Control Board shall continue to monitor the operations of the project proponent and take all necessary action whenever it is found that the unit is not



compliant or is deviating from the prescribed environmental norms.



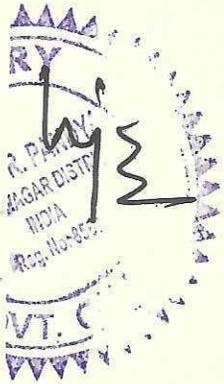
DEPONENT

**VERIFICATION**

Verified at Gandhinagar on this 8<sup>th</sup> day of December 2025 that the contents of the above affidavit are true and correct, nothing stated therein is false and nothing material has been concealed therefrom.



DEPONENT



IDENTIFIED BY ME

SOLEMNLY AFFIRMED BEFORE ME

ADVOCATE/PERSON



NAME : .....

NILESH R. PANDYA

ADD: .....

NOTARY GOVT. OF INDIA

DATE: 08/12/25

- 8 DEC 2025

- 8 DEC 2025



**Complaint Investigation Report**

1.	Complaint Received from	Shri Gulabsinh H. Rathod, Village – Ler, Ta. Bhuj, Kutch (Complaint ID - 48076)
2.	Complaint received against	M/s. Ashapura Perfoclay Limited (PCB ID - 17774)
3.	Date of inspection	27/02/2025
4.	Person contacted during investigation	1. Shri Gulabsinh H. Rathod (Complainant) 2. Shri D S Tripathi (HR Head, Ashapura Perfoclay Limited)
5.	Grievances with respect to the pollution issues	The above said complaint received from Shri Gulabsinh H. Rathod is regarding Air Pollution, Water Pollution, Crop damage, Violation of EC & CCA conditions.
6.	Verification during inspection	<p>First, the complainant is contacted and the complainant shown the storage of gypsum on open area at survey no. 163 and shown the gypsum lying near the connecting bridge provided on natural SWD. Thereafter the complainant showed his crops of corn farm and castor farm on which dust is deposited. Then the complainant insisted to take the sample of his borewell as it is polluted and informed that the industry is carrying out water and air pollution. After listening to the grievances of the complainant, the unit is visited.</p> <p>During visit, Production line – 5 &amp; 6 are found in operation. During visit, all other production line including Production line – 7 &amp; 8 are not found in operation. Unit has CCA for manufacturing of Bleaching Earth - 12000 MT/Month which is valid upto 24.06.2028. Unit has disconnected steam valve and recirculation valve of all the reactors, dismantled dryer No. 2 and Dryer No.1, granulator to activation belt which is common for both the lines belt pedestal is removed, V-belt of crusher are removed for production line no. 1 &amp; 2.</p> <p>Unit has provided ETP consisting of collection tanks cum neutralization tanks, intermediate storage tanks, clarifier, filter press, sand filters, Ultrafiltration plant, RO plant and Solar evaporation pond for generated wastewater. During visit, ETP is observed in operation. Permeate water generated from RO is utilized in manufacturing process and RO Reject generated from RO Plant is send to solar evaporation pond. Unit has provided MEE which is observed not in operation. One sample from solar evaporation pond is collected for analysis. Generated domestic waste water is to be treated at provided STP and treated wastewater is to be utilized in gardening within premises. During visit, STP is not found in operation as the renovation work of the office building is going on.</p> <p>During visit, Dust deposition is found on the crops of corn farm and castor farm of the complainant. Also dusting /fugitive emission are found in plant area and internal road. Unit is instructed take corrective/Preventive measures in this regards in the plant area and also to improve housekeeping and carryout water sprinkling on internal roads to avoid fugitive emission from the unit. Unit is instructed to develop greenbelt in the periphery of the plant</p>

		<p>premises.</p> <p>During visit, dryer no. 5 &amp; 6 are observed in operation. Unit has provided cyclone separator, bag filter and water scrubber as APCM with dryer 6 and cyclone separator and water scrubber as APCM with dryer 5. The Online analyzers provided with Dryer 5 &amp; 6 shows PM concentration of 64.7 mg/Nm<sup>3</sup> and 87.9 mg/Nm<sup>3</sup>. One no. of process gas sample is collected from dryer 6. During visit, Pulveriser No. 5 &amp; 6 are found in operation. Cyclone + Bag filter is provided with Pulveriser No. 5 &amp; 6. Unit has provided two coal fired boilers no. 4 &amp; 5. During inspection, boiler no. 5 is observed in operation. Unit has provided APH, multi cyclone separator, bag filter and water scrubber as APCM with boiler. Online analyzer provided with boiler shows PM – 55.2 mg/Nm<sup>3</sup>, SO<sub>2</sub> – 3 ppm, NO<sub>x</sub> – 14 ppm. One no. of flue gas sample is collected from Boiler no. 5. Unit is instructed to remove stacks with pulveriser – 1 &amp; 2, Classifier, Dryer – 2 as mentioned in the CCA. During visit, a new HAG with dryer is found installed other than the mentioned in the CCA. Unit is instructed to clarify regarding its CTE/CCA. During visit, HAG with dryer is not found in operation. Unit is instructed to provide nomenclature to each stack provided and its APCM as per CCA.</p> <p>During visit Approx. 15000 MT of gypsum waste is stored in the premises. Unit is disposing the gypsum into filling in existing mines at Mata no Madh &amp; Pundi and to cement industry for co-processing. During visit, Gypsum is found stored in open area at Sr.No.163 and near the connecting bridge provided on natural SWD. Unit is instructed to take necessary corrective measures and store the same in environment sound manner. Unit is instructed to provide Fencing/boundary wall to your plant premises.</p> <p>Unit is instructed to submit the details of production, water consumption, wastewater generation, fuel consumption, HW generation and disposal for the last 3 months with supporting documents.</p> <p>Unit is instructed to comply with the EC/CTE/CCA conditions.</p>
7.	Collection of samples	<p>During inspection total four samples are collected:</p> <ol style="list-style-type: none"> <li>1. Water sample collected from borewell of Gulabsinh Rathod Farm @ 280 meters away from the unit.</li> <li>2. Water sample collected from Evaporation Pond.</li> <li>3. Air sample collected from stack attached to dryer no. 6.</li> <li>4. Air sample collected from stack attached to boiler no.5 (6TPH).</li> </ol>
8.	Grievances other than pollution issues	--
9.	Conclusion	<ul style="list-style-type: none"> <li>• During visit, Gypsum is found stored in open area at Sr.No.163 and near the connecting bridge provided on natural SWD.</li> <li>• During visit, Dust deposition is found on the crops of corn farm and castor farm of the complainant.</li> <li>• Also dusting /fugitive emission are found in plant area and</li> </ul>

		<p>internal road.</p> <ul style="list-style-type: none"> <li>Other findings as mentioned in above Sr. No.6.( Verification during inspection).</li> </ul>
10.	Remarks	--

**Photographs taken during inspection:**



Dust deposition is found on the crops of corn farm and castor farm of the complainant.



Gypsum is found stored in open area at Sr.No.163 and near the connecting bridge provided on natural SWD.

**Date:27.02.2025**

**R R Gaekwad  
AEE**

**Satish Parmar  
SSO**

## Annexure R-2

By R.P.A.D

SHOW CAUSE NOTICE

WHEREAS you are having industrial plant located at Survey no. 167, Vill: Ler, Ta: Bhuj, Dist: Kutch for manufacturing of Bleaching Clay.

AND WHEREAS, the Board officials had visited your unit on dated 27/02/2025 wrt complaint. During inspection following non compliances observed.

1. Storage of gypsum on open area at survey no. 163 and shown the gypsum lying near the connection bridge provided on natural SWD.
2. Dust deposition is found on the crops of corn farm and castor farm of the complainant.
3. Also dusting/ fugitive emission are found in plant area and internal road.
4. A new HAG with dryer is found installed other than the mentioned in the CCA.

In view of the above, you are called upon to show cause for contravening the provisions of the Air Pollution (Prevention and Control) Act-1981 directed to submit action taken report wrt above with documentary evidence within 5 days from the date of issue of this notice, failing to which further actions will be initiated against your industrial plant under the Air Pollution (Prevention and Control) Act-1981.

For and on behalf of  
Gujarat Pollution Control Board



(T.C. Patel)  
Unit Head

NO. PC/CCA-KUTCH- 27(30) /GPCB ID – 17774/865865

Date: 26/06/2025

To,  
M/s. Ashapura Perfoclay Limited,  
Survey no. 167, Vill: Ler,  
Ta: Bhuj, Dist: Kutch - 370 020.

Copy To:

Regional Officer

Regional Office, Kutch (West)..... For submit detailed verification report with fact of the unit wrt to above non compliance.



## Inspection Report

Print IR

## General Details

Sr. No.	Type	Detail
1.	Name & Address of the industry	M/s Ashapura Perfoclay Ltd PLOT NO:S.no.167,163 & 164, Village: Ler, S.no.167,163 & 164, Village: Ler, , Ler - 370020 DIST: Kutch West, TAL: Bhuj
2.	Scale & Category	Large / Red
3.	Date of commencement of production	01/06/2011
4.	Date & time of visit	23/07/2025 01:00
5.	Name of the person contacted	Mr.D.S.Tripathi(HR Head)
6.	References	

## Inspection Observation

Sr. No.	Type	Detail
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1.	General	<p style="text-align: center;"><b>119</b></p> <p>~ 29/07/2025 This unit is inspected with respect to CCA-Amendment in accordance with CTE No. 142083 to incorporate an alternate mode of disposal of gypsum waste through backfilling in abandoned mines of M/s. Shri Meet Jitendra Thakker at Survey no. 241 paiky, Vill: Modsar, Ta: Bhuj, Kutch and SCN issued from HO vide letter no.: PC/CCA-KUTCH-27(30)/GPCB ID- 17774/865865 dated 26/06/2025. Unit has obtained CCA (AWH-126060) for manufacturing of Bleaching Earth - 12000 MT/Month, which is up to 24/06/2028. Earlier unit has obtained CTE- Amendment (CTE-142083) for gypsum backfilling in abandoned mines of M/s. Shree Meet Jitendra Thakkar at Survey no. 241, Vill: Modsar, Kutch of existing plant located at Survey no: 167, Vill: Ler, nr. Bhujodi, Tal: Bhuj, Dist: Kutch., which is valid up to 23/07/2031. This mine lease is transferred from M/s Madhuben M. Ashar to Shri Meet Jitendra Thakkar. M/s Madhuben M. Ashar (PCB ID: 62037) has obtained ToR to CTE (ECC) (CTE-62980) in from the Board on 24/04/2023. During inspection, some areas of the mine were found to be filled with rainwater and all other areas were observed dry &amp; the work of laying HDPE sheet at the bottom of the mine was in progress. Unit has not started backfilling in abandoned mines yet. Unit is instructed to submitted Schedule-I auditor report for backfilling of gypsum waste. Unit has been issued SCN from Head office with the following points; 1) Storage of gypsum on open area at survey no. 163 and shown the gypsum lying near the connection bridge provided on natural SWD; During visit, unit has provided a boundary wall of metal sheet on the front side of Survey No. 163 and unit has shifted gypsum waste there and stored at survey no. 163. 2) Dust deposition is found on the crops of corn farm and castor farm of the complainant; dusting is not observed during visit; however, unit is instructed take corrective/Preventive measures to avoid Dusting/fugitive emission from plant area and internal road &amp; develop greenbelt in the periphery of the plant premises. 3) Also dusting/fugitive emission are found in plant area and internal road; during visit, no fugitive emissions were observed in the plant area and internal road, however unit is instructed take corrective/Preventive measures to avoid Dusting/fugitive emission from plant area and internal road. 4) A new HAG with dryer is found installed other than the mentioned in the CCA; during visit, new HAG with dryer is found not in operation, however unit is instructed to clarify regarding its CTE/CCA. During visit unit is found in operation. During inspection, production line no. 5 &amp; 6 is found in operation. During visit, all other production line including Production line - 7 &amp; 8 are not found in operation. Unit is instructed to submit the details of production, water consumption, waste water generation and disposal, fuel consumption, hazardous waste generation and disposal for the last 3 months. Photographs taken during the visit are attached in teg. , Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI</p>
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2.	Water	<p>~ 29/07/2025 Source of water is through GWIL &amp; Bore well. Unit has obtained NOC from CGWA for ground water abstraction of 90.0 M3/day Saline water. Unit has not proposed to any changes in water consumption as well as waste water generation, due to CCA- Amendment. Generated industrial waste water is treated at provided ETP. Unit has provided ETP consisting of collection tanks cum neutralization tanks, intermediate storage tanks, clarifier, filter press, sand filters, Ultrafiltration plant, RO plant and Solar evaporation pond for generated industrial waste water. During visit, ETP is found in operation. Permeate water generated from RO is utilized in manufacturing process and RO Reject water generated from RO Plant is send to solar evaporation pond. Unit has provided MEE which is observed not in operation. One sample is collected from solar evaporation pond for analysis purpose. Generated domestic waste water is to be treated at provided STP and treated wastewater is to be utilized in gardening within premises. During visit, STP is not found in operation as the renovation work of the office building is going on. , Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI</p>
3.	Air	<p>~ 29/07/2025 Unit has not proposed to any changes in flue gas emission and process gas emission. Unit has provided two coal fired boilers no. 4 &amp; 5 having capacity of 6 TPH each. During inspection, boiler no. 5 is found in operation. Unit has provided APH, multi cyclone separator, bag filter and water scrubber as APCM with boiler. During visit, dryer no. 5,6 &amp; 7 are observed in operation. Unit has provided cyclone separator, bag filter and water scrubber as APCM with dryer no. 7 and cyclone separator, bag filter and water scrubber as APCM with dryer no. 6 and cyclone separator and water scrubber as APCM with dryer no. 5. During visit, Pulveriser No. 5 &amp; 6 are found in operation. Cyclone + Bag filter is provided as APCM with Pulveriser No. 5 &amp; 6. During visit, a new HAG with dryer is found installed other than the mentioned in the CCA. Unit is instructed to clarify regarding its CTE/CCA. During visit, HAG with dryer is not found in operation. Stack sampling is carried out from the followings: 1) From Stack attached to Boiler No. 5(6TPH), 2) From Stack attached to Dryer No. 7. Unit is instructed take corrective/Preventive measures to avoid Dusting/fugitive emission from plant area and internal road &amp; develop greenbelt in the periphery of the plant premises., Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI</p>
4.	Haz	<p>~ 29/07/2025 Unit has proposed to alternate mode of disposal of gypsum waste through backfilling in abandoned mines of M/s. Shri Meet Jitendra Thakker at Survey no. 241, Vill: Modsar, Ta: Bhuj, Kutch. During visit Approx. 20,000 MT of gypsum waste is stored in the premises. Unit is disposing the gypsum into filling in existing mines at Mata no Madh &amp; Pundi and to cement industry for co-processing. During visit, Gypsum is found stored at Sr.No.163 &amp; 164. , Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI</p>

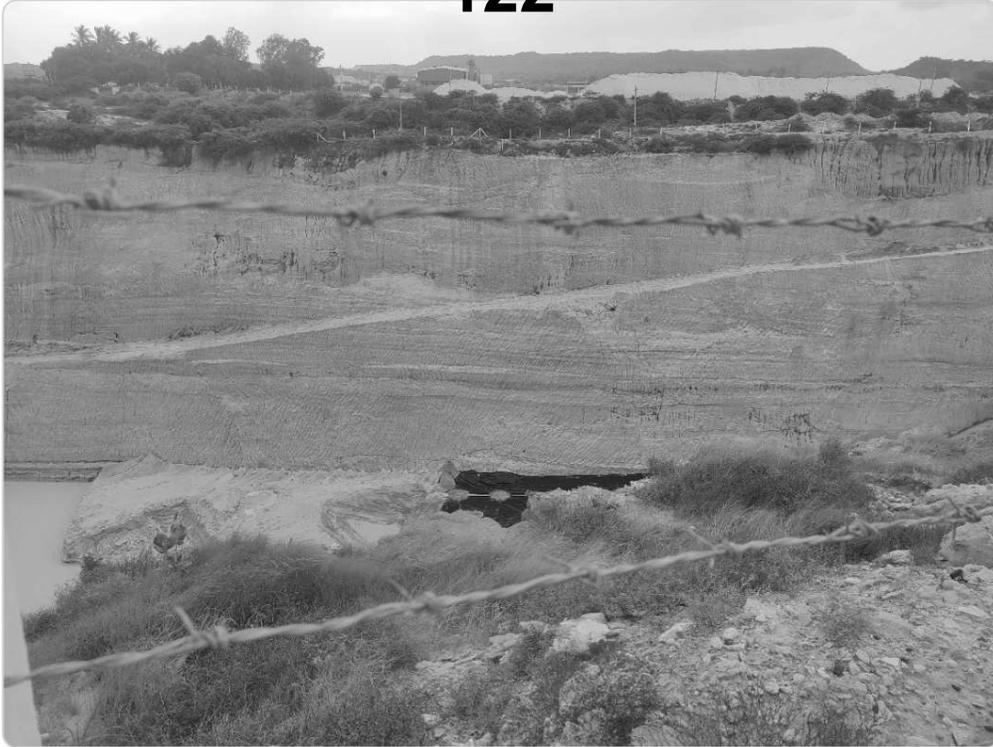
Sr. No.	NEI PDF	Document Description	Action
1	17774 Aahapura Perfoclay Ltd NEI.pdf	Copy of NEI	

## View Instructions List

Sr. No.	View Instructions	Type of Instructions
1	છેલ્લા ત્રણ માસના ઉત્પાદન, કાચા માલના, બળતણ, ધાણી વપરાશ તેમજ Hazardous Waste Generation/Disposal/Stock ધિયેરેની માહિતી ઈન-3 માં અદેની કચેરીએ રજૂ કરવી.	Product
2	આપના એકમમાં વૃષ્ટિ રોપણ કરવું/સ્થાપ વધારવો.	Product
3	During visit, a new HAG with dryer is found installed. Clarify regarding its CTE/CCA.	Air
4	Submit Schedule-I auditor report for backfilling of gypsum waste in abandoned mines.	Product
5	Take corrective/Preventive measures to avoid Dusting/fugitive emission from plant area and internal road.	Air

## List Of Uploaded Photographs

Photo 1  
122



**Remarks:** During inspection, some areas of the mine were found to be filled with rainwater and all other areas were observed dry & the work of laying HDPE sheet at the bottom of the mine was in progress.

Photo 2



**Remarks:** Dusting is not observed during visit.

Photo 3  
123



**Remarks:** Unit has provided a boundary wall of metal sheet on the front side of Survey No. 163.

Photo 4



**Remarks:** Unit has shifted gypsum waste and stored at survey no. 163.

Sr. No.	Uploaded PDF	Documents Description	Action
No Records available.			

## Check List

SrNo.	Questions	Options	Remarks
1	1 - EIA Notification, 2006 and Amendment thereof	<input type="button" value="Yes"/>	<input type="button" value="Obtained"/>
2	2 - CRZ Notification, 2019 and Amendment thereof	<input type="button" value="NA"/>	<input type="button" value=""/>
3	3 - Environmental Audit Scheme of GPCB	<input type="button" value="Yes"/>	<input type="button" value="Schedule 2"/>
4	7 - Inclusion in Eco Sensitive Zone (Notified / Draft) of Protected Areas	<input type="button" value="NA"/>	<input type="button" value=""/>
5	9 - Applicability of Rule-6/Rule-9 of the Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016 and Amendment thereof	<input type="button" value="NA"/>	<input type="button" value=""/>
6	12 - Online Continuous Emission & Effluent Monitoring Systems installed and connected with SPCB / CPCB.	<input type="button" value="Yes"/>	<input type="button" value="Installed"/>

## Compliance Details

Sr No.	Inspection ID	Document	Compliance Type	Compliance Reason
No Records available.				

## Annexure R-4

## GUJARAT POLLUTION CONTROL BOARD

KUTCH WEST, KATIRA COMMERCIAL COMPLEX-1,  
FIRST FLOOR , NEAR INCOME TAX OFFICE,  
MANGLAM CHAR RASTA ,SANSKAR NAGAR,,  
BHUJ - 370 001,  
(T) (02832) 250 620

No.: GPCB / KUTCH WEST / PCBID-17774 / 879821      Date:

1. Name & Address of the industry : M/s Ashapura Perfoclay Ltd  
PLOT NO:S.no.167,163 & 164,  
Village: Ler, S.no.167,163 &  
164, Village: Ler, , Ler - 370020  
DIST: Kutch West, TAL: Bhuj
2. Scale & Category : Large/Red
3. Name of the authorised person : DEVISAHAY NANDLAL  
TRIPATHI
4. Date of commencement of production : 01/06/2011
5. Date & time of visit : 10/10/2025 02:00 hrs
6. Name of the person contacted : Mr.Mukesh Tanna(HSE)
7. References

### 8. Observation crux

Type	Detail
AIR	~ 08/11/2025 Unit has provided two coal fired boilers no. 4 & 5 having capacity of 6 TPH each. During inspection, coal fired boilers no. 4 is found in operation. Unit has provided APH, MCS, bag filter and water scrubber as APCM with boiler. One no. of flue gas sample is collected from Boiler no. 4. During inspection, dryer No. 6 & 7 are found in operation. Unit has provided cyclone separator, bag filter and water scrubber as APCM with dryer no. 6

	<p>&amp; 7. One no. of process gas sample is collected from dryer no. 6. During inspection, Pulveriser no. 5 &amp; 6 are found in operation. Cyclone + Bag filter is provided as APCM with Pulveriser No. 5 &amp; 6. During inspection, unit has installed a new HAG with dryer is found installed other than the mentioned in the CCA. Unit is instructed to obtained CTE/ CCA for the same. During inspection, no petcoke stock was found. During inspection, HAG with dryer is found not in operation. Unit is instructed to develop greenbelt in the periphery of the plant premises., Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI</p>
Water	<p>~ 08/11/2025 Source of water is through GWIL &amp; Borewell. Generated industrial waste water is treated at ETP. Unit has provided ETP consisting of collection tanks cum neutralization tanks, intermediate storage tanks, clarifier, filter press, sand filters, Ultrafiltration plant, RO plant and Solar evaporation pond. During inspection, ETP is observed in operation. Permeate water generated from RO is utilized in manufacturing process and RO Reject water generated from RO Plant is send to solar evaporation pond. Unit has provided MEE which is observed not in operation, during inspection. One water sample is collected from evaporation pond for analysis. Generated domestic waste water is treated at provided STP and treated wastewater is utilized in gardening within premises. During visit, STP is found in operation and one water sample is collected from final outlet of STP for analysis. , Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI</p>
Haz	<p>~ 08/11/2025 During inspection Approx. 25000 MT of gypsum waste is stored in the premises. Unit is disposing the gypsum into filling in existing mines at Mata no Madh &amp; Pundi and to cement industry for co-processing. During inspection, Gypsum is found stored in open area near the connecting bridge provided on natural SWD and also stored on the South Side inside the unit premises. Unit is instructed to take necessary corrective measures</p>

	and store the same in environment sound manner. , Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI
General	~ 08/11/2025 Unit is inspection wrt complaint received from Shri Gulabsinh H. Rathod and Shri Kuldipsinh K. Sodha regarding legal action against Ashapura Perfoclay. Firstly, the complainant, Shri Gulabsinh H. Rathod is contacted and he shown the gypsum lying near the connecting bridge provided on natural SWD (Seasonal water drain) and also show gypsum is stored on the South Side inside the unit premises. Thereafter the complainant show that unit has not provided LED display at main gate. Then we contacted Shri Kuldipsinh K. Sodha on mobile, but he could not be contacted. After listening to the grievances of the complainant, the unit is visited. During inspection, the plant is found in operation. During inspection, Production line - 5 & 6 are found in operation. During inspection, all other production line including Production line - 7 & 8 are found not in operation. Unit has obtained CCA for manufacturing of Bleaching Earth - 12000 MT/Month which is valid up to 24.06.2028. Unit is instructed to submit the details of production, water consumption, wastewater generation, fuel consumption, HW generation and disposal for the last 3 months with supporting documents. Unit is instructed to provide digital data display board. , Entry By AEE H M Sorathia, SO MR. KISHAN JIVANBHAI DESAI

#### 9. Details of samples taken during inspection

Sr No.	Sample Type	Point of Sample	Color & Condition	Ph Range
1	Air		25 ml each	For PM(460 ltrs.)& For SOx,NOx- 60 ltrs. each
2	Air		----	For PM-420 Ltrs.
3	Water		Colourless	@7-8 on pH Strip
4	Water		Colourless	@7-8 on pH Strip

10. Inspection team

: H M Sorathia, SO  
MR. KISHAN JIVANBHAI DESAI

## 11. Instruction Details:

Sr No.	View Instruction	Type of Instruction
1	1)છેલ્લા ત્રણ માસના ઉત્પાદન, કાચામાલના, બળતણ, પાણી વપરાશ તેમજ Hazardous Waste Generation/Disposal/Stock વર્ગિતેની માહિતી દિન-3 માં અત્રેની કચેરીએ રજૂ કરવી.	Product
2	2)આપના એકમમાં વૃક્ષારોપણ વ્યાપ વધારવો.	Product
3	3) એકમની વગિતો દર્શાવતું ડીસ્પ્લે બોર્ડ લગાવવું Digital.	Product
4	4) આપને દર્શાવ્યા મુજબ ની જગ્યાઓ પર Gypsum Waste વેરાયેલ છે તેને તાત્કલકિ ધોરણે ઉઠાવવો.	Haz
5	5) નવા લગાવેલ HAG with Dryer માટે CTE/CCA મેળવવું.	Air

## 12. Photographs:

NIL

## 13. Documents Collected:

Photographs

## 14. NEI Document:

NEI

## 15. Check List:

Sr No.	Question	Option	Remark
1	Inclusion in Eco Sensitive Zone (Notified / Draft) of Protected Areas	NA	
2	Environmental Audit Scheme of GPCB	Yes	Schedule 2 auditor
3	Online Continuous Emission & Effluent Monitoring Systems installed and connected with SPCB / CPCB.	Yes	Installed
4	EIA Notification, 2006 and Amendment thereof	Yes	Obtained
5	Applicability of Rule-6/Rule-9 of the Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016 and Amendment thereof	NA	
6	CRZ Notification, 2019 and Amendment thereof	NA	

GPCBID: 17774, InwID: 0, Print by: 650  
Print Date: 08/11/2025 05:00:44



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Annexure R-5

# GUJARAT POLLUTION CONTROL BOARD

Regional Office : Kutch - West

Katira Complex-1, Manglam Char Rasta, Sanskar Nagar, BHUJ-KUTCH : 370 001.

Ph. No. 02832-250620. E-mail : ro-gpcb-kutw@gujarat.gov.in • xgn site : gpcbgn.gujarat.gov.in **B.V.R.P.A.D.**

## SHOW CAUSE NOTICE

Whereas you are having an Industrial plant located at Survey No. 167,163 & 164, Vill.: Ler, Tal.: Bhuj, Dist.: Kutch for manufacturing of Bleaching Earth.

And WHEREAS, the Board has granted CC&A vide order no. AWH- 147501, dated 16/07/2025, which is valid upto 24/06/2028 for production of above said product with conditions mention therein.

AND WHEREAS, the board officials had visited your unit on dated 10/10/2025 and following noncompliance observed;

- 1) Unit has not provided digital data display board.
- 2) Unit has installed a new HAG with dryer without obtaining CTE/ CCA of the Board.
- 3) Gypsum was found stored in open area near the connecting bridge provided of natural seasonal water drain.

In view of the above, you are called upon to show cause within 7 days why legal action should not be initiated against your industry for contravening the provisions of the Air Pollution (Prevention and Control) Act-1981. You are directed to submit the compliance with respect to above noncompliance. Failure to which further action will be initiated as per applicable Acts.

For and on behalf of  
Gujrat Pollution Control Board

(S. S. Chauhan)  
Regional Officer, Kutch (West)

NO: GPCB/RO/KUW/ID:17774/

Date:

Issue to:

**M/s. Ashapura Perfoclay Ltd,**  
Survey No. 167,163 & 164,  
Vill.: Ler, Tal.: Bhuj,  
Dist.: Kutch (370020)

Copy to:

**The Unit head - Kutch (West),**  
Gujarat Pollution Control Board,  
Gandhinagar, .....

.....for information please.

Outward No:17469, 08/11/2025 06:14:00 PM



## GUJARAT POLLUTION CONTROL BOARD

Kutch West, Katira Commercial Complex-1, First Floor, Near Income Tax office,  
Manglam Char rasta, Sanskar nagar.,  
BHUUJ - 370 001,  
(T) (02832) 250 620

### Inspection Report

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

No.: GPCB / KUTCH WEST / PCBID-17774 / 29498-05/12/2025

1. Industry Details : **M/s Ashapura Perfoclay Ltd**  
PLOT NO:S.no.167,163 & 164, Village: Ler, S.no.167,163 & 164, Village: Ler, , Ler - 370020 DIST: Kutch West, TAL: Bhuj
2. Scale & Category : Large/Red
3. Production Date : 01/06/2011
4. Date & time of visit : 02/12/2025 02:15, (Inspection ID : 894983)
5. Person Contacted : D S Tripathi - HR
6. Type of Inspection : APP

#### 7. Field Observations (Crux)

Type	Details
General	<p>~ 04/12/2025 Unit is visited wrt CTE Amendment application and wrt complaint of Shri Kuldipsinh Khimji Sodha (Email dated 29.11.2025) regarding noncompliance of the show cause notice dated 08.11.2025. During visit, the plant is found in operation. Unit has not proposed any changes in production, water consumption &amp; wastewater generation &amp; disposal, fuel consumption, hazardous waste generation. Unit has proposed to change the name of HAG with Dryer - 5 (CCA Sr. No. 16) to BTX Dryer. Unit has also proposed one new BTX dryer as a standby to earlier mentioned HAG with Dryer - 5 (BTX Dryer). Unit has also proposed two dedusting units with Bag filter as APCM. Unit has already installed the new BTX dryer (Standby) and two dedusting units with Bag filter as APCM. Unit has applied with latefees. During visit, Production line - 5 &amp; 6 are found in operation. During visit, all other production line including Production line - 7 &amp; 8 (Dryer - 8,9,10 &amp; Pulveriser - 8,9,10) are not found in operation. Unit has CCA for manufacturing Bleaching Earth - 12000 MT/Month which is valid upto 24.06.2028. Unit has been issued SCN vide No. GPCB/RO/KUW/ID:1774/17469 dated 08.11.2025 for the reasons mentioned therein. The pointwise compliance of the same is as under: Point No.1: Unit has not provided digital data display board. Compliance of Point No. 1: Unit has provided digital display board at the security gate. Point No.2: Unit has installed a new HAG with dryer without obtaining CTE/CCA of the board. Compliance of Point No. 2: Unit has applied for CTE Amendment for the standby HAG with dryer (BTX dryer) vide Inward ID - 422241. Point No.3: Gypsum was found stored in open area near the connecting bridge provided of natural seasonal water drain. Compliance of Point No. 3: During visit, No gypsum dumps are found in open area near the connecting bridge provided on the natural Storm Water Drain. This said connecting bridge of the Storm Water Drain is utilized by the unit for transportation of Wet Gypsum through trucks from the plant area for storage at Survey No. 163. , Entry By NRO H M Sorathia, SO MR. RAJENDRASINH RAJABHAU GAEKWAD</p>
	~ 04/12/2025 Unit is having ETP consisting of collection tanks cum





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### Inspection Report

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

Water	<p>neutralization tanks, intermediate storage tanks, clarifier, filter press, sand filters, Ultrafiltration plant, RO plant and Solar evaporation pond for generated wastewater. During visit, ETP is observed in operation. Permeate water generated from RO is utilized in manufacturing process and RO Reject generated from RO Plant is sent to solar evaporation pond. The RO reject from the Solar Evaporation Pond is taken into 3 Stage MEE followed by ATFD. During visit, MEE is observed in operation. One sample from solar evaporation pond is collected for analysis. Generated domestic wastewater is to be treated at provided STP and treated domestic wastewater is utilized in gardening within premises. During visit, STP is found in operation. , Entry By NRO H M Sorathia, SO MR. RAJENDRASINH RAJABHAU GAEKWAD</p>
Air	<p>~ 04/12/2025 During visit, dryer no. 6 &amp; 7 are observed in operation. Unit has provided cyclone separator, bag filter and water scrubber as APCM with each dryer 6 &amp; 7. The Online analyzers - opacity meters provided with Dryer are sent for external calibration by the unit. One no. of process gas sample is collected from dryer 7. During visit, Pulveriser No. 3, 4, 5 &amp; 6 are found in operation. Cyclone + Bag filter is provided with Pulveriser No. 3,4, 5 &amp; 6. Unit has provided common stack with Pulveriser 5 &amp; 6. Unit has provided two coal fired boilers no. 4 &amp; 5. During inspection, boiler no. 5 is observed in operation. Unit has provided APH, multi cyclone separator, bag filter and water scrubber as APCM with boiler. Online analyzer provided with boiler shows PM - 52.6 mg/Nm<sup>3</sup>, SO<sub>2</sub> - 12 ppm, NO<sub>x</sub> - 1 ppm. One no. of flue gas sample is collected from Boiler no. 5. During visit, the existing HAG with dryer - 5 (BTX dryer) and new HAG with dryer (Standby BTX dryer) are not found in operation. During visit, Ambient air quality is found normal, and no dusting is observed. Unit is instructed to provide nomenclature to each stack provided and its APCM as per CCA. Unit is instructed to take all necessary precautionary measures to avoid dusting during material handling., Entry By NRO H M Sorathia, SO MR. RAJENDRASINH RAJABHAU GAEKWAD</p>
Hazardous	<p>~ 04/12/2025 During visit Approx. 27000 MT of gypsum waste is stored in the premises. Unit is disposing the gypsum into filling in existing mines at Mata no Madh &amp; Pundi and to cement industry for co-processing. During visit, Gypsum is found stored in open area at Sr.No.163 of the unit. Unit is instructed to submit the details of production, water consumption, wastewater generation &amp; disposal, fuel consumption, HW generation and disposal, Gypsum generation and disposal for the last 3 months with supporting documents., Entry By NRO H M Sorathia, SO MR. RAJENDRASINH RAJABHAU GAEKWAD</p>

#### 8. Details of samples taken during inspection :





## GUJARAT POLLUTION CONTROL BOARD

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### Inspection Report

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

Sr. No.	Sample Type	Collect Date	Color & Condition	PH Range	Field Observation	Collect Charge	LAB
1	A	03/12/2025	25ml for each gas	512.7 0 Lit. for PM, 58.5 Lit. for SO <sub>2</sub> , 1123. 9 ml for NO <sub>x</sub>		13100	KUW
2	A	03/12/2025	--	420 Lit		9600	KUW
3	W	03/12/2025	Colorless	@ 7 - 8 on pH strip		960	KUW

#### 9. Instructions given during inspection:

Sr. No.	View Instruction	Type Of Instruction
1	1. Take all necessary precautionary measures to avoid dusting during material handling.	Air
2	2. Provide nomenclature to each stack provided and its APCM as per CCA.	Air
3	3. Submit the details of production, water consumption, wastewater generation & disposal, fuel consumption, HW generation and disposal, Gypsum generation and disposal for the last 3 months with supporting documents.	Product

#### 10. Inspection Team :

H M Sorathia, SO  
MR. RAJENDRASINH RAJABHAU GAEKWAD

