

BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, AT PUNE

INTERLOCUTORY APPLICATION NO. 129 OF 2023  
IN  
APPEAL NO. 17 OF 2023

IN THE MATTER OF:

DHANLAXMI ORGO CHEM

...APPELLANT

VERSUS

GUJARAT POLLUTION CONTROL BOARD & ANR.

... RESPONDENTS

AFFIDAVIT OF BEHALF OF RESPONDENT No. 1 & 2 -

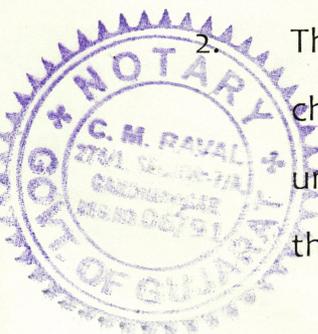
GUJARAT POLLUTION CONTROL BOARD

I, Ashok M Chauhan, adult, having my office at Paryavaran Bhavan, Section 10-A, Gandhinagar, Gujarat do hereby solemnly affirm and state on oath as under:

1. I am presently serving on the post of Unit Head with the Gujarat Pollution Control Board – respondent no. 2 in the present application. I have read copy of the application filed by the applicant, pleadings of parties and the orders passed by this Hon'ble Tribunal on the application. I am conversant with the facts of the case having perused the record pertaining to the case available in my office. I am authorised to make the present affidavit on behalf of the State Pollution Control Board and am otherwise competent to swear the present affidavit.

2. The applicant is a company engaged in the business of manufacturing chemicals. It is given permission to operate as a Zero Liquid Discharge unit. Zero liquid discharge (ZLD) refers to a treatment process in which the plant discharges no liquid effluent into surface waters. During an

*M Chauhan*



*M Chauhan*









has the potentiality to seriously harm the surrounding environment and risk the general public to exposure of untreated hazardous waste, the applicant has again resorted to committing an illegal act. The applicant clearly seems to be habituated at doing illegal acts, and appears determined to knowingly discharge untreated hazardous waste in the surrounding environment.

- 13. I submit that for these and other reasons that may be argued at the time of hearing of the application and the appeal, no indulgence is required to be extended to the applicant who has no respect for the law and/or sanctity of judicial process. The appeal and the application are replete with factually incorrect and patently false statements, disclosing the mindset of the applicant of completely disregarding the law and/or abusing the process of law. I, therefore, humbly pray that the Hon'ble Tribunal be pleased to dismiss the appeal and application by imposing exemplary costs.

Mheubar

DEPONENT

VERIFICATION

Verified at Gandhinagar on this 14<sup>th</sup> day of June, 2023 that the contents of the above affidavit are true and correct, nothing stated therein is false and nothing material has been concealed therefrom.



Mheubar

DEPONENT

Solemnly Affirmed Before Me

*C. M. Raval*

(C. M. RAVAL)  
NOTARY  
Govt. of Gujarat

14 JUN 2023

Entered in Notary Register at  
 Serial No. 418 Vol. No. I  
*C. M. Raval*  
 C. M. RAVAL, Advocate & Notary  
 GANDHINAGAR.

14 JUN 2023

## Annexure R1

REPORT OF JOINT COMMITTEE WITH REFERENCE TO HON'BLE NGT ORDER IN APPEAL NO.17 OF 2023 IN THE MATTER DHANLAXMI ORGO CHEM VERSUS GUJARAT POLLUTION CONTROL BOARD & ANR

1.0 BACKGROUND

Based on a complaint received by GPCB about contamination of water of Vaduchi Mata lake and damage of crops & contamination of fields due to leakage in illegal undergrounds pipelines, GPCB visited the site on 03.03.2023 and found yellow coloured contaminated soil with acidic pH near the gate of M/s Neptune Organics chemicals which is located near to M/s. Dhanlaxmi OrgoChem, Village Lunej, Tal. Khambhat. In presence of members of Khambhat Industrial Association and the complainant, the soil at the said location was excavated and found an illegal underground pipeline (black coloured HDPE pipe) carrying colourless effluent having pH of 2 to 4 on pH strip. The illegal underground pipeline was further excavated to back trace the source and found that the illegal underground pipeline was coming from the premises of M/s. DhanlaxmiOrgo Chem. Accordingly, the team of GPCB visited the premises of M/s. DhanlaxmiOrgoChem and observed that there was no stock of spent acid (Hazardous Waste) in the premises which has to be reused back in the process as per the condition given in CCA. As per the CCA condition, the unit is permitted to reuse 39.2065MT/Year of Inorganic acid (Spent acid), which is categorized as Hazardous waste. No records were available for the generation, reuse/ disposal of spent acid generated from Sulpho V.S. product. The ETP and spray dryer were not in operation during the visit. No inward/outward register maintained at the main gate of the unit and the unit was unable to show the recording of the CCTV camera installed in the premises.

Accordingly, GPCB has issued closure direction under Section -33A of the Water (Prevention and Control of Pollution) Act 1974 and levied interim EDC of Rs.25,00,000/- for the current illegal effluent discharge through illegal pipeline vide closure order bearing outward no.737192 dated: 21.03.2023. Copy of the said closure direction order issued by GPCB is placed as **Annexure-1**.

Consequent to the closure direction order issued to the unit by GPCB, the unit, M/s. Dhanlaxmi Orgochem has filed an appeal before the Hon'ble NGT, Western Zone Bench, Pune against the closure direction issued by GPCB and the appeal has been accepted by the Hon'ble NGT vide Appeal No. 17 of 2023 (WZ).

The Hon'ble NGT vide its order dated: 31.05.2023 in Appeal No.17 of 2023 (WZ) with I.A. No. 129/ 2023 in Appeal No. 17 of 2023 in the matter DhanlaxmiOrgoChem Versus Gujarat Pollution Control Board &Anr. has constituted a Joint Committee comprising one member each of Central Pollution Control Board (CPCB), Gujarat Pollution Control Board (GPCB) and the District Magistrate of the concern District and GPCB to be the nodal agency of the said committee and directed the joint committee to visit the spot in presence of the appellant/ applicant to verify as to whether the pipeline has been removed or not and submit its report within a week. It was also stated that the appellant shall be informed the date of visit to the spot by the Committee in advance. The copy of the said NGT order is placed as **Annexure-2** for reference. The relevant portion of order is reproduced below for kind ready reference.

*"3. Since we find that there is dispute as to whether the pipeline has been removed, we deem it appropriate to constitute a Joint Committee comprising one member each of Central Pollution Control Board (CPCB), Gujarat Pollution Control Board (GPCB) and the District Magistrate of the concern District and GPCB will be the Nodal Agency of the said Committee. We direct the Joint Committee to visit the spot in presence of the appellant/ applicant to verify as to whether the pipeline has been removed or not and submit its report within a week. The appellant shall be informed the date of visit to the spot by the Committee in advance. A copy of the report shall be served on the appellant as soon as it is filed before this Tribunal and the appellant may file objections, if any within a week thereafter."*

The joint committee comprises of following officers:

- 1) Shri D.S. Gadhvi(IAS), District Collector, District – Anand
- 2) ShriS. Pradeep Raj, Scientist-D, Regional Directorate, CPCB, Vadodara,
- 3) SmtN.D. Ajmera, Regional Officer, GPCB – Anand

## 2.0 APPROACH

The GPCB being Nodal Agency of the joint committee, arranged the site visit on 05<sup>th</sup> June, 2023 and also intimated the appellant about the site visit through email dated: 03.06.2023. Copy of the email sent by GPCB to the appellant intimating the schedule of site visit is given in **Annexure-3** for reference. Shri D.S. Gadhvi(IAS), District Collector, District – Anand, Shri S. Pradeep Raj, Scientist-D, CPCB- Vadodara and Smt N.D. Ajmera, Regional Officer, GPCB – Anand visited the site and the unit on 05.06.2023. ShriGautam Patel (Owner) and Advocate Deepak Shah (learned counsel for the Appellant) were present during visit. The members of the committee had discussion with representative of the unit and also requested for few information to examine the matter. The committee also captured few photographs of the site during the visit. Accordingly, the observation & findings of the committee are covered in this report.

## 3.0 ABOUT THE UNIT (M/S. DHANLAXMI ORGO CHEM), ANAND

The unit, M/s. DhanlaxmiOrgoChem (Erstwhile M/s. Dinesh Allorga Ltd.) is small scale Red Category industry located at plot no. 328/01, Vaduchi Mata Road, Lunej-388620, Tal: - Khambhat, Dist: - Anand. The unit has obtained Consolidated Consent & Authorization (CC&A) from GPCB vide consent order no. AWH-118172 dated: 11.04.2022 with validity up to 31.12.2026 for the production of various Organic and Inorganic products with a condition to reuse the generated spent acid within the premises. Copy of the CCA obtained from GPCB is placed as **Annexure-4**.

The unit has amended the CCA vide CCA- Amendment order no. AWH-122952 issued on 30.11.2022 with validity upto 31.12.2026 by including the condition to reuse the generated Inorganic Acids (Spent acids) @ 39.2065 MT/Year back in the process within the premises. Copy of the amended CCA obtained from GPCB is placed as **Annexure-5**.

#### 4.0 OBERVATIONS AND FINDINGS

The unit was not operational during visit and all the machineries were found standstill condition. MGVL has disconnected the Industrial supply of electricity (LT industrial connection having 100 KW contract demand) to the unit on 02.04.2023 and only single phase power supply was found working. Copy of the letter issued by MGVL, Cambay sub-divisional office intimating the power supply disconnected to the unit in response to the closure direction issued by GPCB to the unit is placed as **Annexure-6** for reference. The ETP and spray dryer were not in operation during the visit. Effluent was found stored in the collection tank of ETP.

The Unit has submitted Form 21 (Annual report of industrial unit) along with the Revocation application online to GPCB, the copy of the Form-21 submitted by the unit is given in **Annexure-7**. The production details of the unit as submitted in the Form-21 are as follows:

Product Name	Production Quantity in Year 2021-2022	Production Quantity in Year 2022-2023
4- SulphoHydrazone/ 5-Sulpho Hydrazone	47.510MT/Year	59.76MT/Year
Sulpho V.S. (Acetanilide or O.A.)	40.76MT/Year	45.202MT/year

As per CCA issued by GPCB vide No. AWH-122952 dtd.30.11.2022, condition no.5, generated inorganic acids (spent acid) @ 39.2065MT/year shall be disposed off by reuse in the process within premises.

As per the reply submitted by the industry dtd.10.05.2023 in response to the written instructions given during visit dtd.09.05.2023, generated spent acid from November 2022 to April 2023- 14.06MT was used in production of 2 Pyridone and/or PNTOSA. However, as per Form 21 submitted by the unit, they had manufactured only 4-SulphoHydrazone/ 5-Sulpho Hydrazone and Sulpho V.S. (Acetanilide or O.A.) in year 2021-2022 and 2022-2023, till date. Hence, the information submitted by the unit as above are in contradiction to each other, which indicated unreliable nature of the unit.

The manifest detail indicates that unit had last disposed of chemical sludge of quantity @9.250MT to M/s. ECO CARE Infrastructure Pvt. Ltd., Surendranagar with manifest no.1574170 on dtd.08/03/2022.

During the visit, two underground HDPE barrels were found within the premises filled with dark brown coloured acidic wastewater having pH of 2 to 4 on pH strip and some solid waste & debris. The said underground barrels were located between the collection tank of ETP and the filter press in the production plant near boundary wall in the South-West Direction within premises. Photographs of the same are given in the **Annexure-8**.

The committee instructed the unit during visit to empty the underground HDPE barrels and accordingly, the acidic wastewater and the solid wastes from the said barrels were removed. About 75 litres of acidic wastewater were removed and stored in an HDPE drum and the solid wastes & debris soaked in the acidic wastewater from the underground drum were also removed and collected in 26 nos. of HDPE bags and stored in the filter press area having acid proof brick lining floor before disposal.

During the visit, hazardous waste was found stored in the storage shed alongwith acidic soil of about 600kgs which was excavated earlier by GPCB from the site where leakage of acidic wastewater from the underground illegal pipeline occurred and contaminated the soil (i.e. near the gate of M/s Neptune Organics chemicals). GPCB had earlier instructed

the unit to dispose the said contaminated soil in accordance to the HWM&H rules. However, the same is still not been disposed by the unit.

During the visit, the joint committee found on 05.06.2023 that the underground HDPE pipeline (black coloured HDPE pipeline of about 3" diameter) which was coming out from the south boundary wall of the premises of the unit (in the Vaduchimatamandir road) is not completely removed. About 2'10" length (2 feet & 10 inches) of the said underground HDPE pipeline was still found protracted out from the factory premises. The opening of the said pipeline was covered with a plastic sheet and tied with rubber tube. The photographs taken during the visit showing the presence of underground HDPE pipeline coming out of the factory premises is given in the **Annexure-8** of this report.

The ETP and the spray dryer were not operational during the visit. The unit does not have any CCTV or flow meters connected to the OCEMS (Online Continuous Effluent Monitoring System) system.

As per the condition under the Water (Prevention and Control of Pollution) Act, 1974 given in the CCA issued by GPCB, flow meters should be installed at inlet of ETP, outlet of ETP and inlet of spray dryer and the records shall be maintained in temper proof manner. However, the unit has not provided any flow meter neither at inlet or outlet of ETP and does not have any record for the same.

It is worth mentioning that in the first appeal filed by the Appellant industry, the industrial unit had admitted existence of the underground pipeline from its premises in point no.9 G by saying that neutral pH effluent was collected by the manager from outlet pipeline near the Appellant's gate. Moreover, the unit in its letter to GPCB vide letter dated: 02.06.2023 towards reply for the site visit report dated: 31.05.2023 of GPCB has mentioned that the mentioned underground pipeline found is the leftover after

removing the underground pipeline approximately before 2 years and also submitted photographs showing the said leftover underground pipeline was covered with plastic bag and sealing with cement concrete. However, there is no proper evidence or proof to substantiate the exact date or period to show when those photographs were taken. Moreover, since the unit is ZLD (Zero Liquid Discharge) unit, there should be no discharge of any effluent/ treated effluent/ wastewater or provision for discharge from the factory premises to the outside environment. From the above, it is evident that the unit has provided an underground pipeline from the factory to outside their premises. Since, there is no proper flow meters, records of ETP or spray dryer operation, records of lime or neutralizing agents consumption, reuse details of spent acid and presence of underground pipeline laid from the factory premises to outside, clearly indicated the industry's intention and practice for illegal discharge for effluent/wastewater to outside environment.

During earlier visit by GPCB on 03.03.2023, discharge of acidic effluent was observed from underground pipeline originating from this unit & during visit on 09.05.2023 a valve system provided for effluent discharge at Haz. Waste storage area was found completely removed and the sump in which the valve was present was completely sealed with cement concreting.

The production area of the unit is provided with concrete flooring and the filtration area which houses centrifuges & filter press are provided with acid proof brick line and therefore the status of underground pipeline network within the premises if any and underground pipeline within the premises connecting the illegal underground pipeline found outside the premises could not be verified during the visit. However, a small patch of concrete flooring within the premises from the boundary wall in the south direction (where the underground HDPE pipeline was present outside the premises) to the drain near centrifuge area was found wet indicating newly laid cementing. The photographs showing the same taken during the joint committee visit is given in Annexure-8.

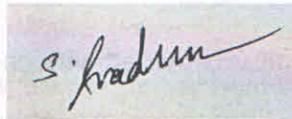
Considering the above, the unit has been instructed to carry out Ground Penetration Radar (GPR) Study to check status of underground pipeline network if any within premises. The GPR study may be carried out by the unit in presence of GPCB on immediate basis through any reputed agency or the agency empanelled with GPCB and to submit the study report to GPCB for further suitable action.

Summarily, the existence of practice of unauthorized and intentional discharge of acidic effluent through pipeline by the unit has been substantiated from the following:

1. Existence of portion of pipeline (black coloured HDPE underground pipeline of about 3" diameter) coming out from the south boundary wall of the premises of the unit (in the Vaduchimatamandir road) in spite of ZLD condition.
2. No provision of flow meters, records, etc.
3. No provision of CCTV cameras connectivity to OCEMS.
4. Submission of details to GPCB is contradiction w.r.t. production details on different occasion.



**N.D. Ajmera**  
**Regional Officer, Anand**  
**GPCB**



**S. Pradeep Raj**  
**Scientist-D, CPCB,**  
**RD-Vadodara**



**Shri D.S. Gadhavi (IAS)**  
**District Collector &**  
**District Magistrate,**  
**Anand**



Annexure - 1  
**215**  
**GUJARAT POLLUTION CONTROL BOARD**

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

R.P.A.D

**CLOSURE DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974. (HERE IN AFTER REFERRED TO AS THE 'WATER ACT') AS AMENDED FROM TIME TO TIME.**

WHEREAS M/s. Dhanlaxi Orgo Chem (Old Name: Dinesh Allorga Ltd.) having an industrial plant located at Plot No. 328/01, Vaduchi Mata Road, Lunj-388620, Tal:- Khambhat, Dist:-Anand for the manufacturing of Dyes and Dyes-Intermediates.

AND WHEREAS the Gujarat Pollution Control Board has granted you consent under the Provisions of the Water Act, the Air Act and the Hazardous & other Waste (Management & Transboundary Movement) Rules vide Consent Order (CC&A) AW11-118172 which is valid up to 31/12/2026 with specific terms and conditions.

AND WHEREAS, Board has received complaint about contamination of water of Vaduchi Mata lake & also about leakage in illegal underground pipelines, their fields get contaminated and their crops get damaged.

AND WHEREAS, during the inspection of your industrial plant on **03/03/2023** w.r.t compliant under Section (24) of the Water Act-1974 by authorized officer of the Board following was observed:-

- 1) During visit outside the premises near the gate of M/s. Neptune Organics Chemicals. (Lat: 22.346908, Long: 72.580654) yellow colour contaminated soil with acidic pH is observed.
- 2) In the presence of members of Khambhat Industrial Association and the complainers, the soil has been excavated by the JCB and underground illegal black colour HDPE pipeline with the colourless effluent of @2-4 pH on pH strip is found.
- 3) After back traced the pipeline with the help of JCB found coming from inside the premises of M/s. Dhanlaxmi Orgo Chem (Lat: 22.347410, Long: 72.581730).
- 4) Board has granted CC&A for Inorganic acid (Spent acid)- 39.2065MT/year as Hazardous waste with a permission to reuse spent acid back in the process within premises. However during visit there is no stock of spent acid is observed.
- 5) During visit there are no records available for generation, reuse/disposal of spent acid generated from Sulpho V.S. product.
- 6) During visit ETP and spray dryer is not observed in operation.
- 7) Unit is unable to show recording of provided CCTV camera and also not maintained inward/outward register at the main gate.

AND WHEREAS a chance of hearing is given to you by giving written instructions by GPCB officers during visit. Your clarification is not acceptable considering nature of violation i.e. ghost pipeline discharge.

AND WHEREAS due to illegal discharge of industrial effluent through illegal underground pipeline you might have sever damages to the surrounding environment.

**Clean Gujarat Green Gujarat**

Website : <https://gpcb.gujarat.gov.in>

AND WHEREAS as per the methodology of Environment Damage Compensation (EDC) submitted by CPCB New Delhi has been accepted by Hon'ble NGT. Read with the orders of Hon'ble NGT OA No. 593/2017 and OA No. 95 of 2018. Your case is liable for interim EDC under clause of 1(e) "Intentional discharge to the environment." Hence, you are liable to pay interim EDC of Rs 25,00,000/- (Rs Twenty five lac) to the Board.

UNDER THE CIRCUMSTANCES, I **Ashok Chauhan, (Unit Head)** of Gujarat Pollution Control Board is directed to issue the directions under Section --33A of the Water (Prevention and Control of Pollution) Act-1974 with immediate effect of this order:

1. To close down the operation of your industrial plant on the above mentioned site with immediate effect from date of issue of this order.
2. To direct the concerned authority to disconnect supply of electricity with immediate effect from date of issue of this order.
3. If your plant runs on captive power plant or D.G-Set, than you shall stop them also with immediate effect from date of issue of this order.
4. To levy interim EDC Rs. 25,00,000/- (Rs. 25 Lac) for the current illegal effluent discharge through illegal pipeline into the environment.
5. To remove the illegal effluent discharge pipeline within and outside premises.

If the above direction are the complied, you are liable for prosecution under Section (41)(2) of the Water Act (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six month and may extend to six years and with fine.

Interim Environment Damage Compensation shall be submitted through RTGS/NEFT in to following account of Board. Receipt of the payment shall be forwarded to emails uh-gpcb-anan@gujarat.gov.in and nuh-gpcb- anan@gujarat.gov.in.

A	Name of Payee	GUJARAT POLLUTION CONTROL BOARD
B	Bank Account Number	10325062238
C	Type of Account	CURRENT
D	Bank	STATE BANK OF INDIA
E	Branch	GANDHINAGAR ZONAL BRANCH
F	Branch Address	SECTOR-10B, IN FRONT OF NEW SACHIVALAYA, GANDHINAGAR-382010
G	IFSC Code	SBIN0001355

For and on behalf of  
Gujarat Pollution Control Board

(Ashok Chauhan)  
Unit Head

Outward No: 1719/21/03/2023



# GUJARAT POLLUTION CONTROL BOARD

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

NO: GPCB/CCA-AND-01(5)/ID-29636/

Dated: /03/2023

Issued to:-

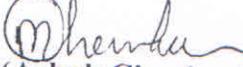
M/s. Dhanlaxi Orgo Chem,  
(Old Name: Dinesh Allorga Ltd.),  
Plot No. 328/01, Vaduchi Mata Road, Luncej-388620,  
Tal:-Khambhat, Dist:-Anand.

Copy to:-

- |   |  |
|---|--|
| 1. The Chairman and Managing Director,<br>Madhya Gujarat Vij Company Ltd.,<br>S.P. Vidhyut Bhavan<br>Race Course, Baroda. | 2. The Deputy Engineer,<br>The Madhya Gujarat Vij Company Ltd.,<br>Sub Division Office, Khabhat,<br>Tal: Khabhat, Dist: Anand. |
|---|--|

With a request to disconnect the supply of electricity (except single phase) of M/s. Dhanlaxi Orgo Chem, (Old Name: Dinesh Allorga Ltd.) located at Plot No. 328/01, Vaduchi Mata Road, Luncej-388620, Tal:-Khambhat, Dist:-Anand with immediate effect from date of issue of this order & intimate to us accordingly.

For and on behalf of  
Gujarat Pollution Control Board

  
(Ashok Chauhan)  
Unit Head

Copy to:

- The District Collector,  
District Collector Office Anand,  
Nr. Ganesh Chowkdi,  
Tal & Dist: Anand .....For your kind information.

Outward No: 737192, 21/03/2023

Clean Gujarat Green Gujarat

Website : <https://gpcb.gujarat.gov.in>

Item No.2

(Pune Bench)

**BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, PUNE**

[THROUGH PHYSICAL HEARING (WITH HYBRID OPTION)]

**APPEAL NO.17 OF 2023 (WZ)  
WITH  
I.A. NO129/2023 IN APPEAL NO.17/2023**

Dhanlaxmi Orgo Chem

.... Appellant  
Applicant

Versus

Gujarat Pollution Control Board &amp; Anr.

.... Respondents

Date of Hearing : 31.05.2023

**CORAM: HON'BLE MR. JUSTICE DINESH KUMAR SINGH, JUDICIAL MEMBER  
HON'BLE DR. VIJAY KULKARNI, EXPERT MEMBER**Appellant/Applicant : Mr. Deepak Shah, Advocate with Mr. Aniruddha  
Kulkarni, AdvocateRespondents : Mr. Maulik Nanavati, Advocate with Ms. Manvi  
Damle, Advocate for R-1**ORDER**

1. From the side of the appellant/applicant, learned counsel Mr. Deepak Shah has appeared, who, in pursuance of our order dated 30.05.2023, has informed the learned counsel for respondent No.1 - GPCB to appear before us today and accordingly, learned counsel Mr. Maulik Nanavati has appeared on behalf of GPCB - respondent No.1.

2. Today, this matter was fixed by us in view of the prayer made by the appellant/applicant that it should be permitted to re-start the industry because the appellant has already made payment of Rs.25 lakhs towards interim environmental compensation and has also removed all the defects, which means that they have also removed the pipeline which was found to be there discharging effluent. The learned counsel for the appellant states that the said pipeline has been removed two years back,

but the same is controverted by the learned counsel for respondent No.1 - GPCB saying that the said pipeline is still existing there and therefore, the re-start order should not be given, though the learned counsel for GPCB did admit that the amount of Rs.25 lakhs has been deposited by the appellant.

3. Since we find that there is dispute as to whether the pipeline has been removed, we deem it appropriate to constitute a Joint Committee comprising one member each of Central Pollution Control Board (CPCB), Gujarat Pollution Control Board (GPCB) and the District Magistrate of the concerned district and GPCB will be the Nodal Agency of the said Committee. We direct the Joint Committee to visit the spot in presence of the appellant/applicant to verify as to whether the pipeline has been removed or not and submit its report within a week. The appellant shall be informed the date of visit to the spot by the Committee in advance. A copy of the report shall be served on the appellant as soon as it is filed before this Tribunal and the appellant may file objections, if any within a week thereafter.

4. The report of the Joint Committee shall be submitted before us by the GPCB, as directed above, by e-mail at [ngt-pune@gov.in](mailto:ngt-pune@gov.in) preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF.

5. A copy of this order shall be served upon all the members of the Joint Committee by the GPCB for compliance as above.

6. Since the violation is still being reported to be there by the learned counsel for respondent No.1 - GPCB, at this stage, no interim order is possible to be passed by us. However, keeping in view the fact that the

industry is not in operation for a longer period, the matter be placed before us on 05.07.2023.

Dinesh Kumar Singh, JM

Dr. Vijay Kulkarni, EM

May 31, 2023  
APPEAL NO. 17/2023 (WZ)  
npj

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Fw: Regarding compliance of Hon'ble NGT order dated 31/05/2023 in the matter of IA No.129/2023 in Appeal No.17/2023-Dhanlaxmi Orgo Chem Vs Gujarat Pollution Control Board & Anr

Nehal Ajmera

Sat 6/3/2023 3:27 PM

To: DHANLAXMI IND. <dhanlaxmiind4@gmail.com>;

Cc: Collector Anand <collector-and@gujarat.gov.in>; prasoon.cpcb@nic.in <prasoon.cpcb@nic.in>; D.M.Thaker <ms-gpcb@gujarat.gov.in>; Legal Officer <legal.gpcb@gmail.com>; Dipali1 A Tank(GoG-GPCB Dept.) <uh-gpcb-anan@gujarat.gov.in>;

1 attachments (239 KB)

31-05-2023.pdf;

Sir,  
With reference to NGT order dtd.31/05/2023 a joint visit by the committee is scheduled on 5th June,2023 at 10:00 AM. This is for your information please.

With regards,  
N.D.Ajmera  
RO, Anand  
GPCB

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**From:** Nehal Ajmera

**Sent:** Saturday, June 3, 2023 3:23:00 PM

**To:** Collector Anand; prasoon.cpcb@nic.in

**Cc:** D.M.Thaker; Legal Officer; Dipali1 A Tank(GoG-GPCB Dept.)

**Subject:** Fw: Regarding compliance of Hon'ble NGT order dated 31/05/2023 in the matter of IA No.129/2023 in Appeal No.17/2023-Dhanlaxmi Orgo Chem Vs Gujarat Pollution Control Board & Anr

Respected Sir,  
With reference to the NGT order dated 31.5.23 and trailing mail a joint visit of M/s. Dhanlaxmi Organics, Khambhat by the committee is organized on 5th June,2023 at 10 AM. The industrial unit will be informed accordingly as directed by NGT in its order as above.

This is for your information please.

With regards,  
N. D. Ajmera  
RO, Anand  
GPCB

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**From:** Nehal Ajmera

**Sent:** Thursday, June 1, 2023 4:32:51 PM

**To:** Collector Anand; prasoon.cpcb@nic.in

**Cc:** D.M.Thaker; Legal Officer; Dipali1 A Tank(GoG-GPCB Dept.)

**Subject:** Fw: Regarding compliance of Hon'ble NGT order dated 31/05/2023 in the matter of IA No.129/2023 in Appeal No.17/2023-Dhanlaxmi Orgo Chem Vs Gujarat Pollution Control Board & Anr

Respected Sir,  
Wrto NGT order dated 31.5.23, regarding joint visit of M/s. Dhanlaxmi Organics, Khambhat, Anand you are requested to give suitable time and date as report is required to be submitted within a week.

For approval please.

With regards  
N D Ajmera  
RO-Anand

From: Legal Executive <legal.gpcb@gmail.com>  
Sent: Thursday, June 1, 2023 6:36:10 AM  
To: Nehal Ajmera; Disha N Chhuchhar(GoG-GPCB Dept.)  
Cc: Dipali A Tank(GoG-GPCB Dept.); Rashmika1 N Patel(GoG-GPCB Dept.)  
Subject: Regarding compliance of Hon'ble NGT order dated 31/05/2023 in the matter of IA No.129/2023 in Appeal No.17/2023-Dhanlaxmi Orgo Chem Vs Gujarat Pollution Control Board & Anr

\*\*\*\*\* This mail is from external domain, i.e. not from gujarat.gov.in domain. Kindly open attachment and link with caution. \*\*\*\*\*

Ref: Hon'ble NGT order dated 31/05/2023.

Sir,

With reference to above subject, Hon'ble NGT has constituted a joint committee comprising one member each of Central Pollution Control Board (CPCB), Gujarat Pollution Control Board (GPCB) and the District Magistrate of the concerned district and GPCB will be the Nodal Agency of the said Committee.

The Committee may undertake to visit the spot in presence of the appellant/applicant to verify as to whether the pipeline has been removed or not and submit its report within a week. The appellant shall be informed the date of visit to the spot by the Committee in advance. A copy of the report shall be served on the appellant as soon as it is filed before this Tribunal and the appellant may file objections, if any within a week thereafter

The report of the Joint Committee shall be submitted before us by the GPCB, as directed above, by e-mail at [ngt-pune@gov.in](mailto:ngt-pune@gov.in) <<mailto:ngt-pune@gov.in>> preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF.

You as Regional Officer, Anand, deputed as a representative of GPCB and as a Nodal agency for coordinate with the committee member and the compliance of Hon. NGT order dated 31/05/2023.

This letter is issued after approval of competent authority.

Thanks & Regards,  
R.R.Panchal  
Legal Executive,  
Legal Branch,  
Gujarat Pollution Control Board,  
Sector 10A Gandhinagar,  
Phone No.09427548944,  
E-mail:[legal.gpcb@gmail.com](mailto:legal.gpcb@gmail.com) <<mailto:E-mail%3Alegal.gpcb@gmail.com>>



# 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.

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 3(c) & 5(5) of the Hazardous Waste and other wastes (Management and Trans boundary Movement) Rules'2016 framed under the E (P) Act-1986. This Board is empowered to grant CC&A.

And whereas Board has received consolidated consent application vide No.212149 Dated: 25/02/2022 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.

### CONSENTS AND AUTHORISATION:

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

To,

M/s. Dhanlaxmi Orgo Chem,  
(Old Name:- Dinesh Allorga Ltd.),  
Plot No. 328/01, Vaduchi Mata Road,  
Lunej-388620,  
Tal: - Khambhat, Dist: - Anand.

1. Consent Order No: AWH-118172, Date of Issue: - 11/04/2022.
- 1.1 The consent shall be valid up to 31/12/2026 under Water Act- 1974 for the use of outlet for the discharge of treated effluent, under the Air Act- 1981 for air emission Authorization under Environment (Protection) Act, 1986 for hazardous waste management and to operate industrial plant for manufacture of the following products:

No.	Product	Total quantity
1	4-Sulpho Hydrazone/ 5-Sulpho Hydrazone	15 MT/Month
2	2,2-Benzene Disulphonic Acid (B.D.S.A.)	10 MT/Month
3	Para Nitro Toluene Ortho Sulphonic Acid (PNTOSA)	25 MT/Month
4	Di Nitro Stilbene Disulphonic Acid	15 MT/Month
5	N -Ethyl Carbomoly, 6 Hydroxy, 4 Methyl, 2 Pyridone (2 Pyridone)	05 MT/Month
6	Para Amino Azo Benzene 4 Sulphonic Acid (PAABSA)	15 MT/Month
7	Sulpho V. S (Acetanilide OR O.A)	05 MT/Month
8	Spray Drying job Work of S.O. Dyes	300 MT/Month
9	Blending Mixing of S.O Dyes	300 MT/Month
10	Di Sodium Phosphate/ Tri Sodium Phosphate/ Sodium Phosphate/ Sodium Nitrate/ Sodium Sulphate/ Sodium Phthalate.	120 MT/Month

11	Potassium Chloride/ Potassium Sulphate/ Potassium Nitrate/ Potassium Acetate.	80 MT/Month
12	Zinc Sulphate/ Zinc Chloride / Nickel Sulphate/ Nickel Chloride/ Magnesium Sulphate/ Magnesium Chloride	120 MT/Month
13	Zinc Sulphate	50 MT/Month
14	Copper Sulphate	25 MT/Month
15	Ferrous Sulphate	80 MT/Month
16	Magnesium Sulphate	25 MT/Month
17	Ferrous Ammonium Sulphate	12 MT/Month

- 1.2 Unit shall procure SO dyes from authorized producers only for blending mixing & spray drying job work. In no case such SO dyes (raw material) shall be manufactured within premises. Complete records of purchase, use & selling shall be maintained in tamper proof manner.
- 1.3 Unit shall carry out job work of spray drying of dyes & blending mixing of dyes using existing spray dryer twice in a week. No additional utilities shall be installed.
- 1.4 Vinyl siphoned for the proposed product shall be procured from authorized manufacturers directly means no manufacturing of the V.S within premises. Records of purchase and use shall be maintained in tamper proof manner.
- 1.5 In no case any type of hazardous waste shall be procured for reuse/recycling or shall be reused/recycled/ utilized as raw material or for product manufacturing as raw material. Spent acid shall not be procured and use as raw material without prior permission.
- 1.6 Management of Solid Waste generated from industrial activities shall be as per Solid Waste Management Rules-2016 (solid waste as defined in Rule-3 (46) and has to comply with the guidelines published time to time by the Central Pollution Control Board, New Delhi. (if applicable).
- 1.7 Applicant shall comply with the provisions of the Plastic Waste Management Rules'2016 and has to comply with the guidelines published time to time by the Central Pollution Control Board, New Delhi. (if applicable).
- 1.8 Applicant shall comply with the provisions of the E-Waste Management Rules'2016 and has to comply with the guidelines published time to time by the Central Pollution Control Board, New Delhi. (if applicable).
- 1.9 Applicant shall comply with the provisions of the Construction and Demolition Waste Management Rules-2016 and has to comply with the guidelines published time to time by the Central Pollution Control Board, New Delhi. (if applicable).
2. CONDITIONS UNDER WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974:
- 2.4 The water consumption shall be as under:



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# GUJARAT POLLUTION CONTROL BOARD

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Sr. No.	Total Domestic water consumption	Total Industrial water consumption	Total water Consumption
1	3.5KL/day	26.6 KL/day	30.1 KL/day

- 2.2 No ground water shall be abstracted from bore well without permission from Central Ground Water Authority.
- 2.3 The total quantity of the industrial effluent to be generated from the manufacturing process and other ancillary industrial operation shall not exceed 15.2 KL/Day.
- 2.4 The total quantity the domestic wastewater (sewage) shall not exceed 3.1 KL/Day.
- 2.5 Generated industrial waste water after treatment shall be completely sent to spray dryer in within premises for achieving zero liquid discharge.
- 2.6 Flow meters shall be installed inlet of ETP, outlet of ETP and inlet to spray dryer and records shall be maintained in temper proof manner.
- 2.7 Sewage shall be disposed off through septic tank/soak pit system.
- 2.8 Flow meters shall be installed inlet of ETP, outlet of ETP and inlet to spray dryer and records shall be maintained in temper proof manner.

### 3. CONDITIONS UNDERAIR (PREVENTION AND CONTROL OF POLLUTION) ACT-1981:

- 3.1 The following shall be used as fuel in utilities.

Sr. No.	Fuel	Total Max. Quantity
1.	Agro briquette	800 Kg./day
2.	Bio Fuel	25 KL/hours

- 3.2 The applicant shall install & operate air pollution control system in order to achieve norms prescribed herewith. Bio fuel shall be procured from authorized producer only.
- 3.3 The flue gas emission through stack attached to following utilities shall conform to the following standards:

Sr. No.	Stack Attached To	Stack Height	Air Pollution Control System	Parameter	Permissible Limit
1.	Boiler(Bio Fuel based)	25 meter	Cyclone Separator & Dust Collector	Particulate Matter	150 mg/NM <sup>3</sup>
2.	Boiler(Agro briquette based)	25meter		SO <sub>2</sub>	100 ppm
				NO <sub>x</sub>	50 ppm

- 3.4 The Process gas emission through stack attached to following utilities shall conform to the following standards:

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Sr. No.	Stack Attached To	Stack Height	APCM	Parameter	Permissible Limit
1.	Reaction Vessels -1	11 meter	Ventury Water Scrubber	SO <sub>2</sub> HCl Cl <sub>2</sub>	40 mg/NM <sup>3</sup> 20 mg/NM <sup>3</sup> 09 mg/NM <sup>3</sup>
2.	Reaction Vessels -2	11 meter	Scrubber 2 Nos.	Acid Mist	50 mg/NM <sup>3</sup>
3.	Spray Drier (Cap. 25 HL/Hour)	21 meter	Bag Filter & Water scrubber	Particulate Matter	150 mg/NM <sup>3</sup>

- 3.5 Applicant shall comply with the National Ambient Air Quality Standards notified by Central Pollution Control Board, New Delhi time to time under the provision of the Environment (Protection) Act-1986 for all the parameters. The concentration of all parameters in the ambient air within the premises of the industry and a distance of 10 meters from the source (other than the stack/vent) shall not exceed than the permissible limit. Standards are as pre Annexure-II.
- 3.6 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 6 a.m. and 10 p.m. and nighttime is reckoned between 10 p.m. and 6 a.m.
4. GENERAL CONDITIONS: -
- 4.1 Any change in personnel, equipment or working conditions as mentioned in the consents form/order should immediately be intimated to this Board.
- 4.2 Whenever due to accident or other unforeseen act or ever, such emissions occur or is apprehended to occur in excess of standards laid down such information shall be forthwith reported to Board, concerned Police Station, Office of Directorate of Health Service, Department of Explosives, Inspectorate of Factories and local body. In case of failure of pollution control equipments, the production process connected to it shall be stopped. Remedial actions/measures shall be implemented immediately to bring entire situation normal.
- 4.3 In order to enable the board to perform its functions of ascertaining the standards of effluent laid down by it for the discharge of the effluent under the conditions 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 samples of effluent got collected and analyzed by one of the laboratories recognized by the state Board.



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- 4.4 The Environmental 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.
- 4.5 The Board reserves the right to review and/or revoke the consent and/or make variations in the conditions, which the Board deems, fit in accordance with Section 27 of the Act.
- 4.6 In case of change of ownership/management the name and address of the new owners/partners/directors/proprietor should immediately be intimated to the Board.

## 5. AUTHORISATION UNDER HAZARDOUS & OTHER WASTES (MANAGEMENT & HANDLING & TRANS BOUNDRY MOVEMENT) 'RULES-2016:

FORM FOR GRANT OR RENEWAL OF AUTHORISATION TO THE OCCUPIERS, RECYCLERS, REPROCESSORS, REUSERS, USER AND OPERATORS OF DISPOSAL FACILITIES

- Number of authorization AWH-118172 and date of issue: 11/04/2022.
- Reference of application no. 212149 and date 25/02/2022.
- Occupier/ Operator of M/s. Dhanlaxmi Orgo Chem, (Old Name:- Dinesh Allorga Ltd.), Plot No. 328/01, Vaduchi Mata Road, Lunej-388620, Tal: - Khambhat, Dist: - Anand is hereby granted an authorization based on the signed inspection report for generation, collection, storage, transport, disposal facilities as under:

Sr. No.	Type of Hazardous Waste	Category as per the Schedules	Quantity	Authorized mode
1	Chemical sludge from waste water treatment	35.3/ Schedule-I	03MT/Year	Collection, Storage, Transportation, Disposal at authorized operational TSDF site of M/s. Eco Care Infrastructures Pvt Ltd, Surendranagar
2	Empty barrels/containers/liners contaminated with hazardous chemicals /wastes	33.1/ Schedule-I	7.5 MT/Year	Collection, Storage, transportation and disposal by Selling to authorized decontamination facility.

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3.	Sludge and filter press cake arising out of production of Zinc Sulphate and other Zinc Compounds	6.1/ Schedul e-I	28.5 MT/Year	Collection, Storage, Transportation, Disposal at authorized operational TSDF site of M/s. Eco Care Infrastructures Pvt. Ltd, Surendranagar.
----	--	------------------------	-----------------	---

4. The authorization shall be valid for a period of 31/12/2026.
5. The authorization is subject to the following general and specific conditions.

#### A. GENERAL CONDITIONS OF AUTHORISATION:

1. The authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
2. The authorization or its renewal shall be produced for inspection at the request of an officer authorized by the State Pollution Control Board.
3. The person authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization.
4. Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
5. The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
6. The person authorized shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty"
7. It is the duty of the authorized person to take prior permission of the State Pollution Control Board to close down the facility.
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.
9. The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
10. The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilization of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorization.



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11. The importer or exporter shall bear the cost of import or export and mitigation of damages if any.
12. An application for the renewal of an authorization shall be made as laid down under these Rules.
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.
14. Annual return shall be filed by June 30th for the peff iod ensuring 31st March of the year.
15. All the units involved in handling hazardous waste shall transport its hazardous waste through AIS-140 compliant Global positioning system (GPS) enabled dedicated tankers/trucks only.
16. Online manifest shall be generated from the system of GPCB-XGN invariably
17. Industry shall follow CPCB Guidelines for Hazardous waste transportation strictly.
18. If the Hazardous waste is not transported in the above-mentioned manner, it would be considered as non-compliance under Hazardous Waste Rules 2016.
19. In case of illegal disposal of hazardous waste without online manifest, there shall be responsibility on the generator of hazardous waste following the principle of Extended Producer Responsibility.
20. In case of violation, GPCB may initiate stringent actions including closure to the concerned industry, cancellation of registration of vehicle, levying EDC (Environmental Damage Compensation) following EPA as per Hon"ble NGT orders in various cases etc.

## B. Specific conditions:

1. The waste generator shall be totally responsible for (i.e. collection, storage, encapsulation, incineration, treatment, transportation and ultimate disposal) of the wastes generated.
2. Records of waste generation, its management and annual return shall be submitted to Gujarat Pollution Control Board in Form - 4 by 30th day of June of every year for the preceding period April to March.
3. In case of any accident, details of the same shall be submitted in Form - 11 to Gujarat Pollution Control Board.
4. As per "Public Liability Insurance Act - 91 "company shall get Insurance Policy, if applicable.
5. Empty drums and containers of toxic and hazards material shall be treated as per Standard Operating Procedure published by the Central Pollution Control Board, New Delhi. Records of the same shall be maintained and forwarded to Gujarat Pollution Control Board regularly.

GPCB ID-29636

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6. Unit shall take all concrete measures to show tangible results in waste generation, reduction, avoidance, reuse and recycle. Action taken in this regards shall be submitted within three months and also along with Form-4.
7. Industry shall have to display the relevant information with regard to hazardous waste as indicated in the Courts Order in W.P. No.657 of 1995-dated 14<sup>th</sup> October-2016.
8. Applicant shall obtain membership of authorized operational (active) TSDF/ CHWIF or authorized hazardous waste treatment and disposal facility (as applicable to the nature of wastes) within a period of 90 days without fail. In case of closure of existing facility, a copy of the membership of active facility shall be submitted to the Board seeking amendment in the authorization.
9. The inspection report based on which authorization is granted can be viewed by industry on GPCB XGN Portal on industry's XGN account.

**For and on behalf of  
Gujarat Pollution Control Board**

*Dipali Tank*

**(Dipali Tank)  
Environment Engineer**

Date: /06/2022

NO.GPCB/CCA-AND-01(5)/ID-29636/

**Issued to:-**

**M/s. Dhanlaxmi Orgo Chem,**

**(Old Name:- Dinesh Allorga Ltd.),**

**Plot No. 328/01, Vaduchi Mata Road,**

**Lunej-388620,**

**Tal: - Khambhat, Dist: - Anand.**

Outward No: 674143, 04/06/2022

GPCB ID-29636

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# GUJARAT POLLUTION CONTROL BOARD

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

**BY RPAD**

## AMENDMENT OF CONSOLIDATED CONSENT AND AUTHORIZATION (CC&A) AWH-122952

No: GPCB/CCA-AND-01(5)/ID: 29636/

Date: /11/2022

To,  
M/s. Dhanlaxmi Orgo Chem,  
Plot No: 328/01,  
Vaduchi Mata Road, Lunej-388620,  
Tal: Khambhat, Dist: Anand.

**Sub: -** Amendment in CCA of this Board.

**Ref: -** 1. Your CCA- Amendment application Inward ID No. 265566 Dated: 18/10/2022.  
2. CCA order No. GPCB/CCA-AND-1(5)/ID:29636/674143 dated. 04/06/2022.

Sir,

Without prejudice to the powers of this Board under the Water (Prevention and Control of Pollution) Act-1974, the Air (Prevention and Control of Pollution) Act-1981 and the Environment (Protection) Act-1986 and without reducing your responsibilities under the said Acts in any way, this is to inform you that this Board grants Amendment in Consent to Operate (CCA) change under the Hazardous & Other Wastes (Management & Handling & Transboundary Movement)-Rules-2016, for inclusion of Spent Acid at Plot No: 328/01, Vaduchi Mata Road, Lunej-388620, Tal: Khambhat, Dist: Anand. The validity period of the order will be up to 31/12/2026.

### AWH: 122952, Date of Issue: 30/11/2022

1. The validity period of the order will be up to 31/12/2026.
2. There shall be no change in to Production quantity.
3. There shall be no change in condition stipulated under the Water Act 1974.
4. There shall be no change in condition stipulated under the Air Act 1981.
5. The condition at Sr. No: 5 of the above CCA order dated 11/04/2022 hence forth shall be read as under.

Sr. No.	Type of Hazardous Waste	Category as per the Sch.	Quantity	Authorized mode
1	Chemical sludge from waste water treatment	35.3/ Sch-I	03 MT/Year	Collection, Storage, Transportation, Disposal at authorized operational TSDF site of M/s. Eco Care Infrastructures Pvt. Ltd, Surendranagar.

Clean Gujarat Green Gujarat

Website : <https://gpcb.gujarat.gov.in>

2.	Empty barrels/ containers/liners contaminated with hazardous chemicals /wastes	33.1/ Sch-I	7.5 MT/Year	Collection, Storage, transportation and disposal by Selling to authorized decontamination facility.
3.	Sludge and filter press cake arising out of production of Zinc Sulphate and other Zinc Compounds	6.1/ Sch-I	28.5 MT/Year	Collection, Storage, Transportation, Disposal at authorized operational TSDF site of M/s. Eco Care Infrastructures Pvt. Ltd, Surendranagar.
4.	Inorganic Acids (Spent Acids)	B15/ Sch-II -	39.2065 MT/Year	Collection, Storage & reuse back in the process within premises.

6. The other conditions of CCA order No. GPCB/CCA-AND-1(5)/ID: 29636/674143/Dated: 04/06/2022 shall remain unchanged.

For and on behalf of  
Gujarat Pollution Control Board

  
30/11/22

(T. C. Patel)  
Unit Head

Outward No: 689511, 30/11/2022

Annexure - F  
**Annexure - 7**

**Form No 21**  
GUJARAT POLLUTION CONTROL BOARD  
Paryavaran Bhavan Sector 10A,  
Gandhi nagar-382 010

**ANNUAL REPORT OF INDUSTRIAL UNIT**

(To be submitted online (XGN) by each industrial Unit on or before 31<sup>st</sup> March in respect of calendar year ended on previous 31<sup>st</sup> December)

1	<b>GPCB ID No.</b>	29636
2	<b>Name &amp; address of the Industry</b>	Dhanlaxmi Orgo Chem, Survey No. 32871, Vaduchai Mata Road, Lunej, Khambhat, Anand.
3	<b>Phone No</b>	9825034098
4	<b>CC&amp;A no., Date &amp; validity. (Copy of the CC&amp;A should be enclosed)</b>	AWH-118172, 11/04/2022 validity 31/12/2026. CCA-Amendment No. AWH- 122952, 30/11/2022 validity 31/12/2026.

**5. Production:**

Sr No	Name of product	Consented Qty (CCA) MT/ Month	Total production during the previous year 2021 -2022. MT/Year	Total production during the year 2022-2023 MT/Year	Name of supporting Document/ Record
1	Para Amino Azo Benzene 4 Sulphonic Acid (PAABSA)	15			
2	2,2-Benzene Disulphonic Acid (B.D.S.A.)	10			
3	Para Nitro Toluene Ortho Sulphonic Acid (PNTOSA)	25			
4	Di Nitro Stilbene Disulphonic Acid	15			
5	N-Ethyl Carbomoly, 6 Hydroxy, 4 Methyl, 2 Pyridone (2 Pyridone)	05			
6	4-Sulpho Hydrazone/ 5-Sulpho Hydrazone	15	47.510	59.76	
7	Sulpho V.S. (Acetanilide OR O.A.)	05	4076	45.202	
8	Spray Drying Job Work of S.O. Dyes.	300			
9	Blending Mixing of S.O. Dyes	300			

F-3700000A

10	Di Sodium Phosphate/ Tri Sodium Phosphate/ Mono Sodium Phosphate/ Sodium Nitrate/ Sodium Sulphate/ Sodium Phthalate.	120		
11	Potassium Chloride/ Potassium Sulphate/ Potassium Nitrate/ Potassium Acetate.	80		
12	Zinc Sulphate/ Zinc Chloride/ Nickel Sulphate/ Nickel Chloride/ Magnesium Sulphate/ Magnesium Chloride.	120		
13	Zinc Sulphate	50		
14	Copper Sulphate	25		
15	Ferrous Sulphate	80		
16	Magnesium Sulphate	25		
17	Ferrous Ammonium Sulphate	12		

**6. Raw material**

Sr. No.	Name	Year 2021-22 Quantity M.T.	Year 2022-23 Quantity M.
1	4- Sulpho Anthranilic Acid	31.25	34.65
2	Benzaldehyde	8.15	9.04
3	Sodium Bisulphite	4.08	4.57
4	Sodium Nitrite	2.72	3.2
5	Caustic Flakes	2.72	3.2
6	Hydrochloric Acid	5.5	6.58
7	V.S.	37.0	46.5
8	Oleum 65%	9.5	12.0
9	Sulphuric Acid 98%	19.5	36.0
10	KCl	9.5	12.0

**7. Utilities**

Sr No	Name of Utilities	Consented Qty (CCA) per Month	Total consumed during the year 2022-2023	Name of supporting Document/ Record
1	Electricity		186367	Electric city Bill copy.
2	Water*** INCLUDING DOMESTIC WATER: -	30.1 K.L.	1350	

## 8 WATER CONSUMPTION

9 Detail of effluent Disposal after Treatment: - Z.L.D.

## 10. Detail of Solid / Gaseous Waste after Treatment: -

Sr. No	Name of Waste	State (S, L, G)	Total consumed during the year 2022-2023			Type & capacity of Treatment facility at site (ETP, APCM)	Outside disposal facility for treated waste (Discharge place)	Total waste disposal during the year
			Generated	Reused	Treated			
1	ETP waste	Solid	80.5	Nil	Nil	ETP	Ecocare	80.5
2	Discarded Container	Solid	08 + 32	Nil	Nil	----	Send back to supplier	Nil



**14. Other Details:**

- (1) CETP membership no, Date, Place & Booked Qty (Membership certificate Should be attached): No membership  
 (2) TSDF Membership Certificate: Ecocare Infrastructures Pvt. Ltd.  
 (3) CHWI membership no, date & place: N.A.  
 (4) Consent No & date of re-user/ Recycler: N.A.

Sr no	Name, Address & phone no of Re-user/Recycler etc.	Consent no & date from GPCB/CPCB/There SPCB (For trans boundary Movement)	Total quantity sent to them	
			Name of waste	Total qty sent during the year
-	-	-	-	-

**(5) Waste transportation Detail**

Sr no	Name, Address & phone no of Transporter	Vehicles registration no of truck/ Tankers & Capacity	Used to carry wastes		Having the authorization from GPCB?	GPS system implemented?	Online manifest implemented?	Logbook Maintained?
			Name of waste	To carry at which place for disposal				
By Road transport								

**15. Need of up gradation, if any**

Looking to the above production & waste generation/& future planning to increase production, mention any up gradation/ addition of pollution control measures are necessary in respect of

1. ETP: : - Not Required.
2. Fuel Change/Use : - Not Required
3. APCM: : - Not Required
4. Scrubbing system : - Not Required
5. Noise Control : - Not Required
6. Solvent recovery Unit : - Not Required

(Signature)

*Gautam*

Gautam Patel. Proprietor



Black coloured HDPE pipeline coming from the unit outside of premises



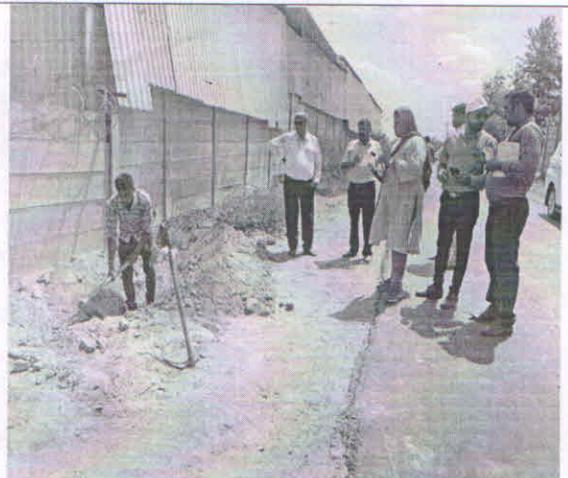
Black coloured HDPE pipeline coming from the unit to outside of premises



Length of Pipeline outside of the wall is 2.10 Feet



Circumference of outside of said pipeline is 10 inch



Excavation work for verifying existence of pipeline in previous route



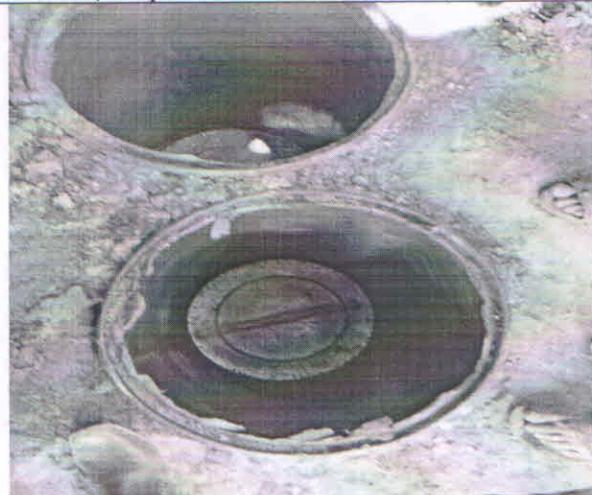
Southern side of unit where pipeline observed

Photographs taken during inspection by joint committee of M/s Dhanlaxmi Orgochem (ID- 29636), Inspection Date: 05/06/2023 in the matter of I.A. No. 129/2023 in appeal no.17 of 2023 on dtd.31/05/2023



After removal of plastic bags from end of the said pipeline which is observed outside of premises.

Two underground barrels observed near filter press of production plant within premise, filled with acidic material of dark brown colour - turbid having pH of @2 to 4 on pH strip & solid waste. (sample collected on 31.5.23)

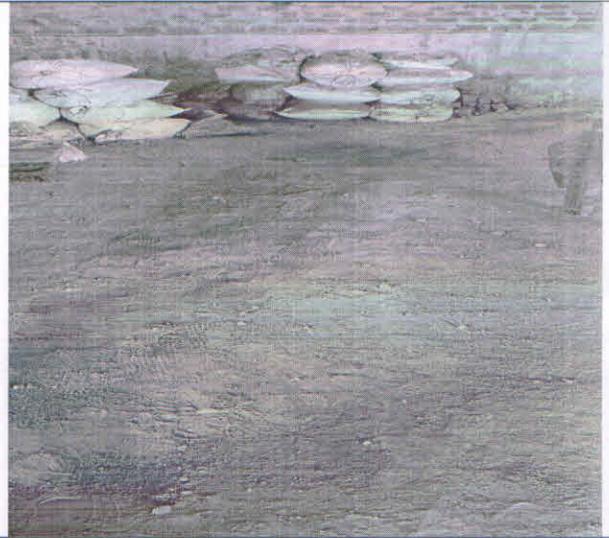


Removing acidic material and wastes from the barrels during visit.

Empty barrels after removal of acidic material and waste from the barrels.



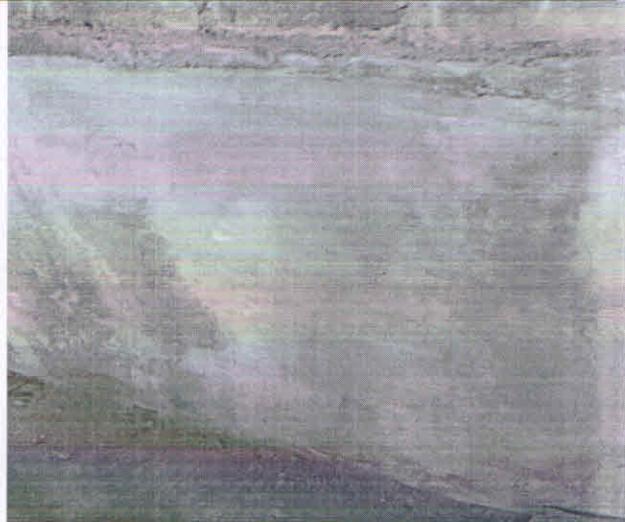
After removal of dark brown colour – turbid & solid waste from the barrels, @ 75 liters w/w collected in one barrel and solid waste is collected in bags and kept near filter press of production plant.



Wet RCC Patch observed in the plant area near southern wall of the unit.



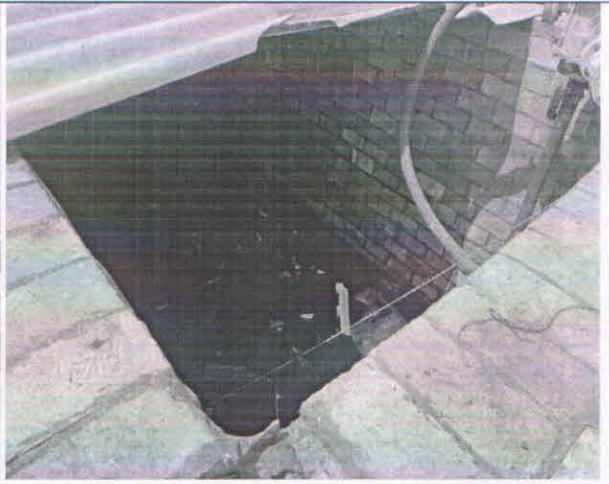
flexible pipes observed within premise.



Some part of southern wall is found wet from inside.



Spray dryer assembly as part of ETP



Collection tank of ETP.