

BOOK NO. - 01 -

PAGE NO. - 53 -

SR. NO. - 209 -

DATE: 20/02/2026

BEFORE THE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

NILESH R. PANDYA

NOTARY

GOVT. OF INDIA

ORIGINAL APPLICATION NO. 134 OF 2025 (WZ)

20 FEB 2026

IN THE MATTER OF:

GULABSINH HARISANG & ORS.

... APPLICANTS

VERSUS

UNION OF INDIA & ORS.

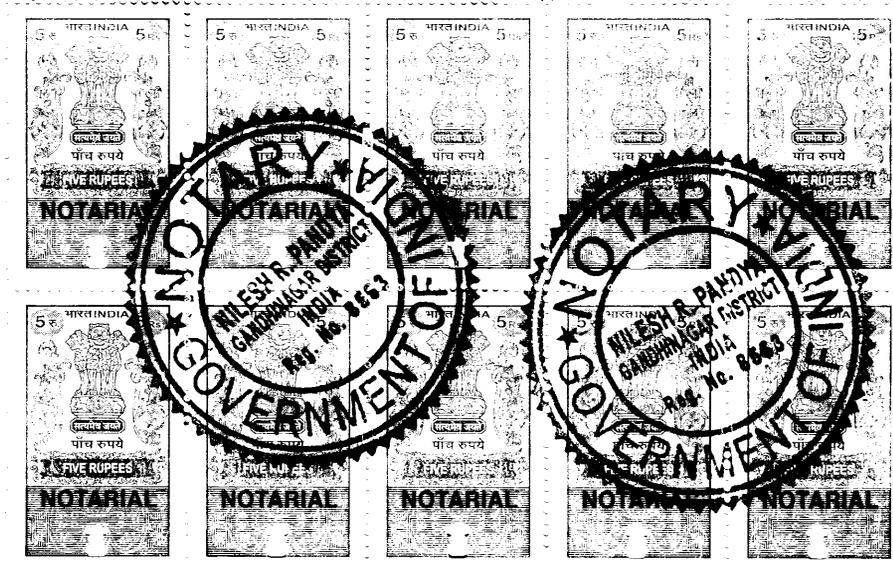
... RESPONDENTS

**AFFIDAVIT ON BEHALF OF STATE ENVIRONMENT IMPACT
ASSESSMENT AUTHORITY**

I, Dipali Tank, adult, having my office at Paryavaran Bhavan, Sector 10A, Gandhinagar 382 010 in the State of Gujarat, do hereby solemnly affirm and state on oath as under:

1. I am presently serving as Member Secretary, Gujarat State Environment Impact Assessment Authority. I am conversant with the facts of the case having perused the record pertaining to the case available in my office. I am authorized to swear the present affidavit on behalf of the Gujarat State Environment Impact Assessment Authority and am otherwise competent to make the present affidavit.
2. No averment and/or submission made in the petition in support of the prayer shall be deemed to have been admitted for and on behalf of the Authority, unless specifically admitted in the present reply.

Dipali Tank



3. The present application has been filed complaining about violation of environmental laws by Respondent No. 12 – M/s Ashapura Perfoclay Limited, located at Survey No. 167, Village Ler, Near Bhujodi, Anjar Bhuj Highway, Taluka Bhuj, Kutch.
4. Initially, the Respondent No. 12 had made an application to the answering respondent contending that it is not a case of violation. Such application, however, came to be rejected. It was left open for the Respondent No. 12 to make an application for *ex post facto* environmental clearance.
5. The Respondent No. 12 thereafter moved an application for Terms of Reference (Under Violation) on 04.12.2024. The application was considered and basis recommendation of the State Expert Appraisal Committee, Terms of Reference (Under Violation) came to be approved by the answering respondent on 06.02.2025. This approval clearly specified that it was subject to final outcome of the Writ Petition (Civil) No. 1394 of 2023 pending before the Hon'ble Supreme Court of India. A copy of Terms of Reference (Under Violation) granted to Respondent No. 12 on 6.02.2025 is annexed herewith and marked as **Annexure R-1**.
6. Subsequently, the Hon'ble Supreme Court of India by its decision dated 16.05.2025 held the Office Memorandum dated 14.03.2017 which *inter alia* provided a process for grant of environmental clearance in respect of the projects, which had started the work on site, expanded the production beyond the limit of environmental clearance or changed the product mix without obtaining prior environmental clearance under the 2006 notification and the Office Memorandum dated 7.07.2021 formulating the Standard Operating Procedure for identification and handling of violation cases as illegal. Both these memorandums were struck down, and the Central Government was refrained from issuing any directives providing for



Dipal Tank

ex post facto environmental clearance in any form or manner or for regularising the acts done in contravention of the EIA notification.

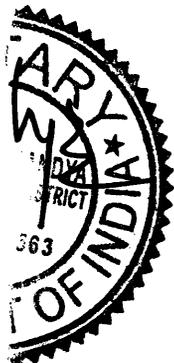
7. In light of this decision of the Hon'ble Supreme Court of India, the Respondent No. 12 - M/s Ashapura Perfoclay Limited did not make any application for grant of environmental clearance after obtaining the ToR (Under Violation). This fact has been admitted by the project proponent in its letter dated 29.11.2025, a copy of which is annexed herewith and marked as **Annexure R-2**.
8. Later, the Hon'ble Supreme Court of India entertained an application seeking review of its earlier decision rendered on 16.05.2025 in the case of Vanshakti and allowed the same by order dated 18.11.2025. The writ petitions were directed to be restored to their original status. As on date, the petitions are pending adjudication before the Hon'ble Supreme Court.
9. In light of the aforesaid development, the Respondent No. 12 has made an application to State Expert Appraisal Committee on 10-02-2026. This application has been submitted in physical form, and has not been made on PARIVESH portal. A copy of the application submitted to State Expert Appraisal Committee has been given in the office of the State Environment Impact Assessment Authority on 10-02-2026. A copy of the application as submitted by Respondent No. 12 in physical form is annexed herewith and marked as **Annexure R-3**.
10. The Ministry of Environment, Forest and Climate Change, Government of India has issued Office Memorandum dated 23.02.2021 and 19.04.2021 directing that State Environment Impact Assessment Authority and State Expert Appraisal Committee shall "ensure that all files for approval of ToR as well as EC be processed strictly through PARIVESH only" and that "non-adherence to the above direction may invite adverse action against the concerned



Sipal Tamh

SEIAA". A copy of the Office Memorandum dated 23.02.2021 and 19.04.2021 issued by the Ministry of Environment, Forest and Climate Change, Government of India is annexed herewith and marked as Annexure R-3.

- 11. In light of the aforesaid directions issued by the Ministry of Environment, Forest and Climate Change, Government of India, the physical application for *ex post facto* grant of environmental clearance made by the Respondent No. 12, though received by the answering respondent, cannot be processed, unless otherwise directed by the Ministry or this Hon'ble Tribunal.
- 12. The answering respondent remains committed to abide by any reasonable direction as may be issued by this Hon'ble Court.



Dipali Tank

DEPONENT

VERIFICATION

Verified at Gandhinagar on this ^{7th} ~~10~~th day of February, 2026 that the contents of the above affidavit are true and correct, nothing stated therein is false and nothing material has been concealed therefrom.

Dipali Tank

DEPONENT

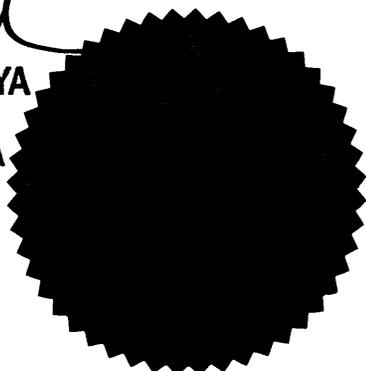


IDENTIFIED BY ME

ADVOCATE/PERSON
 NAME N. R. Dey
 ADD. S. N. Dey
 DATE: 20/2/26
 20 FEB 2026

SIGNED BEFORE ME

N. R. Dey
 NILESH R. PANDYA
 NOTARY
 GOVT. OF INDIA
 20 FEB 2026





Ms. MAULIKA SHAH
MEMBER SECRETARY
SEIAA (GUJARAT)

ANNEXURE-2-1
GOVERNMENT OF INDIA
MOEF & CC
STATE ENVIRONMENT IMPACT
ASSESSMENT AUTHORITY, GUJARAT

No. SEIAA/GUJ/TOR/2(b)/ 83 /2025

Date: 6 FEB 2025 R P A D

Sub: Terms of Reference [ToR] violation to M/s. Ashapura Perfoclay Ltd. at Survey No. 167,166,168, Village: Ler, Nr. Bhujodi, Anjar Bhuj Highway, Ta: Bhuj, District: Kutch, Gujarat.
Ref: Your Proposal No: SIA/GJ/IND1/444162/2023.

Dear Sir,

This has reference to your online application dated 13/09/2023 along with Form-I. The project activity is covered in 2(b) and is of 'B' Category.

Earlier, SEIAA had issued letter vide No SEIAA/GUJ/Gen/2025/59 dated 22/01/2025 informing proponent for applying for ToR (Violation) with following reasons:

1. To reject the EC-Amendment application with a condition that "PP shall apply for TOR- violation in accordance with MOEF & CC OM dated 07.07.2021
2. To inform GPCB to take credible action against the unit for the said notification.

Thereafter M/s. Ashapura Perfoclay Ltd. Bhuj approached Hon'ble NGT (WZ), Pune for against action taken by SEAC & SEIAA for processing application of M/s. Ashapura Perfoclay Ltd., Bhuj dated 13.09.2023. In this regard Hon'ble NGT had issued order vide petition of OA no. 110/2024 (WZ), Pune dated 3.12.2024 issued as under, received to this office on 09.12.2024:

At this stage, we are not inclined to deviate from the SEIAA as it has decided to treat the case in 'violation' category because there is certainly addition of two new survey numbers being sought in the EC by the application dated 13.09.2023 submitted by the applicant. Therefore, the learned counsel for the applicant also agrees that this case is treated in 'violation' category. Finally, Honorable NGT mentioned "We direct respondent No.2 – SEIAA to consider the application of the applicant dated 13.09.2023 and decide the same within a period of one month, failing which if any grievance is left with the applicant, he may approach us again".

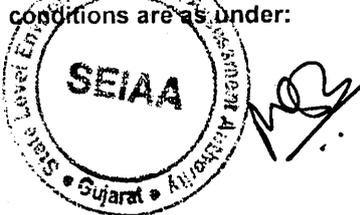
Accordingly, SEAC was informed to submit revised recommendation vide SEIAA letter dated 9.12.2024, which SEAC has forwarded TOR violation recommendation vide letter dated 27.12.2024 with special condition for submitting bank guaranty equivalent to the amount of remediation plan & natural & community resource augmentation plan with the GPCB prior to grant of EC including point wise compliance of violation SOP to be submitted in final EIA report to be prepared by NABED accredited consultant along-with other conditions etc.

Recently authority discussed revised SEAC recommendation dated 20.01.2025 in SEIAA meeting dated 21.01.2025 for recommending the TOR violation project considering Supreme court judgement dated 17.12.2024 vide WRI petition Civil no. 1394/2023 clarifying by SEAC to SEIAA, that Honorable Supreme court has already clarified the prospective effect mentioning by SEAC in their recommendation, which is in accordance with the spirit of judgement of Honorable Supreme Court of India. Authority also discussed Hearing matter of M/s. Orient Ceratech ltd, Kutch vide SCA no. 16256 of 2024 made before Honorable high court of Gujarat regarding renewal of Mining lease etc. authority observed that M/s Orient Ceratech Ltd have been issued TOR violation by MoEF & CC dated 03.01.2020 earlier. Authority discussed other matter of Hon'ble Supreme Court etc.

After deliberation, authority decided to seek legal opinion wrt applicability of hearing judgement and others vide SEIAA letter dated 22.1.2025, which advocate submitted legal opinion dated 29.1.2025, submitting opinion as under:

1. The Authority would therefore be well advised to take up for consideration the case of Ashapura for issuance of Terms of Reference (Violation Case), and grant Terms of Reference subject to imposition of such conditions as deemed appropriate from environmental law point of view and additionally specify clearly that the issuance of Terms of Reference is subject to final order that would be passed by the Supreme Court of India in Writ Petition (Civil) No. 1394 of 2023.

Thereafter, proposal was considered by SEIAA, Gujarat in its meeting held on 29/01/2025 at Gandhinagar. After careful consideration, SEIAA hereby accords Terms Of Reference (ToR) To M/s Ashapura Perfoclay Limited, only after considering Hon'ble NGT order vide dated 3.12.2024 as well as Legal opinion issued only in matter of M/s Ashapura Perfoclay Limited, Bhujodi, Bhuj under various provisions of EIA Notification dated 14th September, 2006 and its amendment. ToR (Violation) is Granted for preparing of Draft EIA report with other conditions are as under:



**Terms of Reference Violation [TOR] to M/s. Ashapura Perfoclay Ltd. at Survey No. 167,166,168, Village: Ler,
Nr. Bhujodi, Anjar Bhuj Highway, Ta: Bhuj, District: Kutch, Gujarat**

1.	DETAILS OF APPLICATION:					
	1.1. Type of application:	Terms of Reference [TOR]-Violation				
	1.2. Proposal no.	SIA/GJ/IND1/444162/2023				
	1.3. Category of Project :	B1-2(b)				
	1.4. Date of application:	13/09/2023				
	1.5. Date of EDS by SEIAA 1.5.1.1. EDS Raised 1.5.1.2. Reply by PP	-				
	1.6. Date of EDS by SEAC 1.6.1.1. EDS Raised 1.6.1.2. Reply by PP 1.6.1.3. Accepted by SEAC	- - 01/11/2023				
	1.7. TOR No. & Date :	Applied for ToR				
	1.8. Date and place of Public Hearing	Will be decided by SEAC				
	1.9. Name of accredited Environmental Consultant & address along with Accreditation No. & Validity	Aqua-Air Environmental Engineers P. Ltd. (NABET/QCI Accredited EIA Consultant): 403-404, Centre Point, Nr. Kadiwala School, Ring Road, Surat - 395002 NABET Accreditation Details: NABET/EIA/2023/SA0196 Valid up to 08 April, 2024				
	1.10. SEAC Meeting No. and Date:	776 th SEAC Meeting Dated 07 February 2024				
	1.11. ADS raised by SEAC meeting No & date :	776 th SEAC Meeting Dated 07 February 2024				
	1.12. Reply Submitted by PP dated:	09.12.2024				
1.13. Revised Consideration SEAC Meeting No. and Date:	SEAC Meeting Dated 19 th December 2024					
2.	DELIBERATIONS OF SEAC					
	1. This office has received an application vide their online proposal no. SIA/GJ/IND1/444162/2023 dated 13.09.2023 made by project proponent (PP) regarding grant of Terms of Reference [ToR]- Violation for preparation of EIA/EMP report.					
	2. Project proponent (PP) has submitted Form-1, PFR and relevant details/information.					
	3. This is an existing project involved in manufacturing of Mineral Beneficiation as mentioned below and now proposed for ToR-Violation:					
	No.	Name of Product	Quantity (MT/Month)	Quantity (MT/Annum)	CAS Number	End Use
	1	Bleaching Clay	12000	144000	70131-50-9	Refining of edible oils and petroleum products
	Note: Production Capacity will not increase, it will remain same as per existing EC & CTE.					
	# Brief Note of Product Profile:					
	No of Manufacturing Plants: 01					
	Brief Note regarding number of Products to be manufactured considering plant capacity:					
4. The project falls under Category B of project activity 2(b) as per the schedule of EIA Notification 2006.						
5. The proposal was considered in the SEAC Video conference meeting dated 07.02.2023.						
6. Project proponent (PP) and their Consultant M/s. Aqua-Air Environmental Engineers P. Ltd. remain present during video conference meeting.						
7. During the meeting dated 07.02.2023, the project was appraised based on the information furnished in Form - 1, Pre-Feasibility Report, Environment Management Plan and details submitted by e-mail.						
8. Earlier PP obtained EC vide order no. SEIAA/GUJ/EC/5(b)/497/2016, dated 30.07.2016 from SEIAA, Gandhinagar. Unit has also obtained Certified EC Compliance Report (CCR) vide letter no.: - J-11/43-2023-IROGNER dated 03.05.2023 from IRO Gandhinagar as per MoEF&CC's OM No. dated 08.06.2022. Out of total 128 conditions, 57 are complied, 27 are Partially Complied, 16 are agreed to comply by the project proponent, 7 are noted by the unit whereas 12 conditions can't be ascertained. PP has shown action taken report of CCR but not submitted, so committee asked to submit the same. Compliance report with action taken report found satisfactory.						
9. Unit has obtained CCA vide No. AWH-126060 on dated 03.05.2023 valid up to 24.06.2028 of the Board at Survey No. 167,166,168, Village: Ler, Nr. Bhujodi, Anjar Bhuj Highway, Ta: Bhuj, District: Kutch, Gujarat. Bleaching Clay - 12000 MT/Month. Now PP has applied for ToR and addition of New Survey No. 167,168, Village: Ler, Nr. Bhujodi, Anjar Bhuj Highway, Ta: Bhuj, District: Kutch, Gujarat.						
10. PP has submitted that during last three years GPCB has issued two Show Cause Notices and three Notice of Direction for which PP has submitted reply to GPCB. Also revocation is obtained against closure order dated 26.07.2018 on 17.07.2021, 10.12.2021, 2.06.2022, 20.01.2023 and 10.05.2023 revocation for six months.						



11. PP has submitted details about litigation pending before any court of Law against the Project (If any) i.e 1. There is one case disposed recently on at Civil court, Bhuj. Appeal 92/2018, Ashapura Perfoclay Ltd T/H Viren Girishbhai Gor as petitioner Vs Government of Gujarat and The Mamlatdar office, Bhuj. (2). There were two cases filed at NGT which is disposed, details as following: A. Original Application 669/2018 Party Name Marvada Amrutlal Becharlal Vs State of Gujarat which was DISPOSED ON 29/01/2021. B. Appeal 40/2019, party name Marvada Amrutlal Becharlal Vs Gujarat State Environment Impact Assessment &Or which was DISPOSED ON 01/09/2020.
12. PP submitted satellite map showing that there is no any water bodies, villages, School, monuments etc. within 500 m radius of the project site. Aerial distance of nearest habitat of Ler Village is @ 1.85 Km. PP also submitted that there are no Eco sensitive zones within the 10 km area from the boundary of the project site. Aerial distance of nearest Wildlife Sanctuary of National Park is @ 7.1 Km.
13. At the outset Consultant of PP informed to the Committee that, this is the case of TOR under violation i.e ex post facto approval of TOR/ EC based on the SOP of MoEF& CC dated 07-07-2021 and 28-01-2022 for the violation cases.
14. The Committee noted that the proposal is for obtaining ToR/ EC under violation based on the MoEF&CC Violation SoP dated 07.07.2021 and 28.01.2022. Further MoEF&CC has informed vide its OM dated 08.02.2014 that Hon'ble Supreme Court has stayed the operation of aforementioned OMs. Moreover, SEIAA vide its minutes of the Joint meeting convened with the Commissioner of Geology and Mining and SEAC on 16.01.2024 decided that Violation (ToR and EC) have to wait till any relief is granted by Hon'ble Supreme Court or the stay is vacated.
15. In view of the above, the Committee unanimously decided to defer the proposal in total with following and consider the same in upcoming SEAC meeting after outcome of the Hon. Supreme Court ;
- MoEF&CC has informed vide its OM dated 08.02.2014 that Hon'ble Supreme Court has stayed the operation of MoEF&CC Violation SoP dated 07.07.2021 and 28.01.2022. In connection with these kindly provide documentary evidence regarding the relief granted by Hon'ble Supreme Court for the stay or the stay to be vacated - once the Order /Judgment by the Hon. Supreme Court in the matter is pronounced.
 - To submit Land documents for all Survey Number/ Block No.
16. PP has submitted reply of above query through Parivesh portal.
17. This proposal is reconsidered in SEAC VC meeting dated: 19.12.2024.
18. PP along with their technical expert/consultant, M/s. Aqua-Air Environmental Engineers P. Ltd remain present in the meeting and made presentation before Committee.
19. During meeting, PP presented and Committee noted the following details:
- o **MoEF&CC has informed vide its OM dated 08.02.2014 that Hon'ble Supreme Court has stayed the operation of MoEF&CC Violation SoP dated 07.07.2021 and 28.01.2022. In connection with these kindly provide documentary evidence regarding the relief granted by Hon'ble Supreme Court for the stay or the stay to be vacated - once the Order /Judgment by the Hon. Supreme Court in the matter is pronounced:** PP presented the case of M/s Ashapura Perfoclay Limited filed in NGT, Pune (OA No: 110/2024) on dated: 08.05.2024. And the latest Honble NGT, Pune order: 03.12.2024 in Para-6 it is stated that "At this stage, we are not inclined to deviate from the SEIAA as it has decided to treat the case in 'violation' category because there is certainly addition of two survey numbers being sought in the EC by the application dated 13.09.2023 submitted by the applicant. Therefore, the learned counsel for the applicant also agrees that this case is treated in 'violation' category. We direct respondent No.2 – SEIAA to consider the application of the applicant dated 13.09.2023 and decide the same within a period of one month, failing which if any grievance is left with the applicant, he may approach us again".
 - We hope you would find the same in order and request your kind self to Consider & Grant our TOR-EC Violation Project file vide proposal no. SIA/GJ/IND1/444162/2023 of Addition of Plot (Survey No. 166 & 168) in existing Mineral Beneficiation of Bleaching Clay Unit of M/s. Ashapura Perfoclay Ltd. At Survey no. 167, Village: Ler, Nr.Bhujodi, Anjar Bhuj Highway, Ta:Bhuj, District: Kutch, Gujarat for further procedure and oblige.
 - o **To submit Land documents for all Survey Number/ Block No:** Existing Survey Number 167: 111994 Sq m and Proposed Survey Number 166: 40,500 Sq m and Survey Number 168: 39,659 Sq m having Total Plot Area 1,92,153 Sq m. The details of Land possession of survey No: 166 & 168 are as under:
 - Copy of Form M-2 dated: 16.11.2019 for survey No: 166, Vill: Ler admeasuring area of 40500 Sq m in the name of M/s Ashapura Exports Pvt Ltd. Further lease deed dated: 14.07.2014 between M/s Ashapura Exports Pvt Ltd and M/s Ashapura Volclay Limited for survey No: 166, Vill: Ler admeasuring area of 40500 Sq m for a period of 30 years. Moreover, Notarized undertaking dated: 10.02.2015 regarding name change from M/s Ashapura Volclay Limited to M/s Ashapura Perfoclay Limited.
 - Copy of NA dated: 09.10.2004 for survey No: 168, Vill: Ler admeasuring area of 39659 Sq m mentioning purpose as industrial in the name of M/s Ashapura Volclay Limited. Further, copy of 7-12 dated: 16.12.2010 for survey No: 168 Paiki 1, Vill: Ler admeasuring area of 31400 Sq m in the name of M/s Ashapura Volclay Limited and copy of 7-12 dated: 16.12.2010 for survey No: 168 Paiki 2, Vill: Ler admeasuring area of 8300 Sq m in the name of M/s Ashapura Volclay Limited.
 - Copy of ROC dated: 27.11.2014 in the name of M/s Ashapura Perfoclay Limited.
 - Board Resolution dated: 29.05.2014 on letter head of M/s Ashapura Volclay Limited for name change.

- Company has obtained Environment Clearance vide letter: SEIAA/GUJ/EC/2(b)/497/2026 Dated: 30 July 2016 for existing unit and Survey No. 167, Village Ler, Nr. Bhujodi, Anjar Bhuj Highway, Bhuj Taluka, Kutch District.
- Company has constructed new plant building & shed and installed the line -7 & 8 instead of line-1 & 2 at Survey no. 166 & 168, Village Ler, Nr. Bhujodi, Anjar Bhuj Highway, Bhuj Taluka, Kutch District without prior EC amendment in existing EC. But Production of bleaching clay is not produced more than consented permission.
- So, We apply for violation of TORs of M/s. Ashapura Perfoclay Ltd. Located at Survey No. 167,166,168, Village: Ler, Nr.Bhujodi, Anjar Bhuj Highway, Ta:Bhuj, District: Kutch, Gujarat.
- We have installed new production line 7 & 8 at Survey no. 166 &168 with discontinue of old line 1 & 2 at Survey no. 167. Survey no. 166 & 168 are not covered in existing environment clearance.
- The old line 1 & 2 was established with production line 3 & 4 at the same place. If The company have to go for shut down line 3 & 4, in such situation all production activity will get disturbed. So new line 7 & 8 has been installed at Survey no. 166.

Last Production Data

YEAR	PRODUCTION (MT/Annum)	EXCESS PRODUCTION (MT/Annum)	EC & CONSENTED QUANTITY (MT/Annum)
2018-2019 (April to March)	94246	Not Exceed	144000
2019-2020 (April to March)	96423	Not Exceed	144000
2020-2021 (April to March)	103485	Not Exceed	144000
2021-2022 (April to March)	94258	Not Exceed	144000
2022-2023 (April to March)	89544	Not Exceed	144000
2023-2024 (April to March)	91139	Not Exceed	144000
2024-2025 (April to November)	60041	Not Exceed	144000
YEAR	PRODUCTION (MT/Annum)	EXCESS PRODUCTION (MT/Annum)	EC & CONSENTED QUANTITY (MT/Annum)

20. In addition to earlier mentioned actions taken by GPCB, additional three SCNs dated: 02.12.2023, 06.03.2024 & 10.09.2024; two Notice of Directions dated: 16.06.2023 & 20.09.2024 were issued. Moreover, revocation is also issued on dated: 14.03.2024.
21. Committee deliberated on Product profile, Layout plan, Storage details, Process safety, Fire safety, water balance & waste water management, Flue gas and process gas emission & Air Pollution Control System, Hazardous waste matrix, EMP, CER, Green belt, etc.
22. Committee noted that there will be no change in production capacity, water consumption, wastewater generation, flue gas emission, process gas emission, hazardous & other wastes generation and it is as per existing EC/CTE/CCA.
23. Committee noted the content of MoEF&CC's OM dated: 12.11.2020 in which Para-5 it is mentioned as under:
"In this regard, while considering the applications for Environmental Clearance under the violation category as per the provisions of S.O. 804(E) dated: 14.03.2017, the EACs/ SEACs may insist upon public hearing to be conducted only for those categories of projects for which the EIA Notification, 2006 itself requires public hearing to be conducted."
24. Committee asked to submit the following details:
 - ✓ In submitted production data, submit details of break-up of production taken wrt production lines.
 - ✓ Details of applicability of public hearing.
25. Later on PP submitted the following details through email dated: 21.12.2024:
 - ✓ Details of production line wise production taken by the existing unit which is as under:

Sr. No.	Period	Line -01 Prod. d. (MT)	Line-02 Prod. (MT)	Line-3 Prod. (MT)	Line-4 Prod. (MT)	Line-5 Prod. (MT)	Line-6 Prod. (MT)	Line-7 Prod. (MT)	Line-8 Prod. (MT)	Total Production (MT)
1	July 21 to Sep. 21	0	1690	5661	4905	6633	5845	0	0	24734

2	Oct. 21 to Dec. 21	0	0	5590	5204	5951	5880	0	0	22625
3	Jan. 22 to March 22	0	0	5374	5520	5865	5870	0	0	22629
4	Apr. 22 to June 22	0	0	5465	5428	5851	5870	0	0	22614
5	July 22 to Sep. 22	0	0	5070	4045	5704	5885	0	0	20704
6	Oct. 22 to Dec. 22	0	0	5615	5715	5876	5850	0	0	23056
7	Jan. 23 to March 23	0	0	5159	5325	6861	5825	0	0	23170
8	Apr. 23 to June 23	0	0	5421	5590	5960	5913	0	0	22884
9	July 23 to Sep. 23	0	0	5520	5668	5837	5950	0	0	22975
10	Oct. 23 to Dec. 23	0	0	5320	5389	5885	5785	0	0	22379
11	Jan. 24 to March 24	0	0	5555	5533	5930	5883	0	0	22901
12	Apr. 24 to June 24	0	0	5482	5675	5845	5857	0	0	22859
13	July 24 to Sep. 24	0	0	5447	5566	5845	5515	0	0	22373
14	Oct. 24 to Dec. 24	0	0	3393	3601	3945	3870	0	0	14809

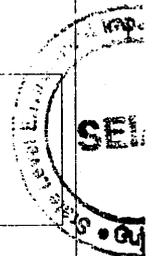
✓ Details of applicability of public hearing. PP has requested for exemption from public hearing in context to MoEF&CC's OM dated: 03.06.2009 and 12.11.2020 with following reasons:

- There is no any adverse effect on local environment and living.
- It is case of addition of two plots which are adjoining to existing area.
- Replacement of old machineries.
- No any production activities commenced.
- In future also there will not be additional pollution load then granted permission.
- Further, for our industrial activities, itself public hearing is required under EIA Notification 2006 and we have already gone through this process, conducted Public Hearing, complied and resolve all representation received during hearing and finally obtained EC in 2016.
- As it is adjoining plots of existing plant premises, both plot areas covered under EIA study (10 KM radius concept) and same was considered during public hearing at the time of granting original EC
- There is no increase in manpower as old plant manpower will work in new plant.
- No domestic effluent also increased
- No change in Process and Technology
- Total production after commencement of new plant will be well within permitted quantity in EC
- No any adverse impact on environment overall.

26. Committee noted the reply of PP and as per MoEF&CC's OM dated: 12.11.2020 regarding public hearing, SEAC also noted that there has been no increase in production or in any other parameter. The only reason for violation is the replacement of old line with new line was carried out in the plot/ land without prior permission of EC and no production has been taken using this newly laid pipeline. SEAC took note of provision made in the above quoted OM of MOEF&CC, which does not make it mandatory to conduct the public hearing but guides SEAC to consider the same, in case of violation, depending upon the merit of the case.

Committee is of the opinion that public hearing is exempted as the unit has already carried out public hearing for manufacturing of bleaching clay and it is case of the replacement of the production line is as per the order of Hon'ble NGT. Committee found the presentation and submission of PP satisfactory.

3.	EIA REPORT (BASELINE STUDIES AND RISK ANALYSIS)-- This is TOR Application Will be carried Out baseline studies and risk analysis, including online and offsite emergency plan, carbon sequestration details, detail EMP, various mitigative measures for controlling dusting during handling and transportation, will be incorporated in EIA.					
4.	RISK ANALYSIS & ITS MITIGATION MEASURES IN GENERAL AS GIVEN IN EIA REPORT This is TOR Application. Will be incorporated in EIA.					
5.	PRODUCT PROFILE AND BRIEF NOTE OF PRODUCT PROFILE					
	Sr. No.	Name of Products	CAS No.	Quantity (MT/month)		
	1	Bleaching Clay	70131-50-9	12000		
	Total			1600		
	End use of Product Refining of edible oils and petroleum products					
	Note: Production Capacity will not increase, it will remain same as per existing EC & CTE. # Brief Note of Product Profile: No of Manufacturing Plants: 01 Brief Note regarding number of Products to be manufactured considering plant capacity:					
6.	PROJECT DETAILS (COST/LAND OWNERSHIP/NA PERMISSION ETC.) Total cost of Proposed Project (Rs. in Crores):					
	Sr. No.	Particular	Cost (in Cr)			
	1	Survey Number 166	1.35			
	2	Survey Number 168	1.33			
	Total		2.68			
	<table border="1"> <tr> <td>Total</td> </tr> <tr> <td>2.68 Crores</td> </tr> </table>				Total	2.68 Crores
Total						
2.68 Crores						
	Break-up of proposed project Cost:					
	Details		Total (Rs. in Lakhs)			
	Rent Land & Other		2.68			
	Building		0.0			
	Plant & Machinery		0.0			
	EMP		0.0			
	Total		2.68			
	Details of Land / Plot ownership details: (Linking between Land ownership and PP is required.) Total Plot area (sq mt):					
	<p>Existing: Survey Number 167: 111994 m²</p> <p>Additional: Survey Number 166: 40,500 m² Survey Number 168: 39,659 m² Total Area: 1,92,153.0 m²</p>					
	Rent agreement, if any: Unit have Valid CCA for Survey No. 167 New Survey No. Survey No. 166: Application No. 20105116338874 Order no. 635/01/05/116/2019 New Survey No. 168: NA: NAA/28/2340/2003-2004 Other Land Possession documents, if any					
7.	IF IT IS EXPANSION WHETHER CCR/EARLIER EC COMPLIANCE GIVEN:					
	Sr. no.	Particulars	Brief Information/Details	Remarks		
	1	Earlier Environmental Clearance (EC) details [EC letter no. and date & obtained from MoEF&CC/SEIAA.]	Unit has earlier EC, Vide letter No. SEIAA/GUJ/EC/5(b)/497/2016 Dated: 30 July 2016 for Bleaching Clay: 12000 MT/Month, Bentonite: 13000 MT/Month Manufacturing Unit.	--		
	2	In case EC not obtained for existing project: Copy of first CTE (NOC) & CCA obtained from GPCB i.e. before 14/09/2006. (For justification that you have not obtained EC for existing project).	Unit has earlier EC, Vide letter No. SEIAA/GUJ/EC/5(b)/497/2016 Dated: 30 July 2016 for Bleaching Clay: 12000 MT/Month, Bentonite: 13000 MT/Month Manufacturing Unit.	--		
	3	Certified Compliance Report (CCR) from the concern authority (IRO-MoEF&CC/MS-GPCB) for existing EC/ CCA as per the MoEFCC's OM no.F.No: IA3-22/10/2022-IA.III [E 177258] dated: 08/06/2022.	Dr. Yogesh Kumar (Deputy Director (S) Scientist- "C", IRO Gandhinagar, MoEFCC Site visited of M/S. ASHAPURA PERFOCLAY LTD. At Survey No. 167,166,168, Village: Ler,	--		



		Natural/Natural Nallah/Drain		
	Lake/Pond/Wetlands	Ler Dam Harmisar Lake Desalsar Lake		1.8 9.5 8.6
	Water supply Tanks/Reservoirs	--		--
	Canal	No Canal within 0.5 Km		--
5	Protected Monuments/Heritage sites/Public Buildings i.e School, colleges, etc.	1. Historical building: Aaina Mahal Palace 2. Historical building: Pragmahal 3. Historical building: Chhatardi Bhuj 4. Ler Village Primary - School 5. MuktaJivan Swamibapa Mahila Arts & Commerce College	Should be more than 0.5 km	9.7 9.8 10.12 1.9 9.5
6	National/State Highway OR Express way	S.H 48 Mundra Bhuj Road N.H 341 Bhujodi Highway	--	9.5 3.1
7	Coastal Regulation Zone (CRZ) (In case of Coastal area projects)	CRZ is not applicable (Gulf of Kutch)	--	60 Km
8	Ground water table in meter	--	--	--
9	Railway Line	Kukma Railway Line	--	3.2
10	Air Port	Bhuj	--	11.0

Comments:

SEAC has deliberated on siting criteria i.e habitation, river/ natural drain/ lake/ pond/canal/ reservoirs, protected monuments/ heritage sites/public buildings i.e. Schools, colleges, Coastal Regulation Zone (CRZ), etc. are found satisfactory.

10. **APPLICABILITY OF GENERAL CONDITIONS AND COMMENTS WITH SPECIFIC CLARIFICATION OF MOEF&CC GUIDELINES:** Any project or activity specified in Category 'B' will be appraised at Central level as Category 'A' if located in whole or in part within 5 Km radius from the project boundary of:

Sr. No	Particulars	Aerial Distance in Km
	Protected Areas notified under the Wildlife (Protection) Act 1972 (53 of 1972)	There is no Wildlife Sanctuary in 10 km radius of the project site. 1: Kutch Desert Sanctuary & Wild Ass Sanctuary: Approx. 150 km
	CPA/SPA (Critically Polluted Area/Severely Polluted Area) as identified by the CPCB	There is no CPA/SPA (Critically Polluted Area/Severely Polluted Area) in 10 km radius of the project site. Rajkot: Approx. 150 km Vatva, Ahmedabad: Approx. 290 Km
3	Eco sensitive areas as notified under sub-section (2) of section 3 of EPA-1986	There is no Eco sensitive areas in 10 km radius of the project site. 1: Kutch Desert Sanctuary & Wild Ass Sanctuary: Approx. 150 km
4	Interstate boundaries and international boundaries	There is no Interstate boundaries and international boundaries in 10 km radius of the project site. 1: Rajasthan: Approx. 300.0 km

Comments:

As per MoEF&CC's notification dated: 25.06.2014 and as per details submitted by PP, General condition is not applicable.

Ensure compliance of category as defined in the amendment to EIA Notification, 2006 vide SO 1599 (E) dated 25/06/2014. i.e.

Conditions of small units: (in case of 5 (f) category units and outside the GIDC)

Sr no.	Condition	Compliance with justification
1	Water consumption less than 25 M3/day;	This is B1-2(b): Category Project Bleaching clay manufacturing Unit.
2	Fuel consumption less than 25 TPD;	

3	Not covered in the category of MAH units as per the Management, Storage, Import of Hazardous Chemical Rules (MSIHC Rules), 1989 as per the legal undertaking submitted with EIA report.			
<p>Comments: As per MoEF&CC's notification dated: 25.06.2014, the condition of small units is not applicable as it is category 2(b) project.</p>				
11.	AREA ADEQUACY AND COMMENTS:			
Area Break up of plan layout & Area Adequacy				
Sr. No.	Name of Structures	Area in (sq. m.)	Required area in (Sq.m)	Percentage (%)
1	Security Office	6.95	6.95	0.01
2	Electric Panel Room	44.4	44.4	0.04
3	Time Office	27	27	0.02
4	Meter Room	10.24	10.24	0.01
5	Canteen	461.83	461.83	0.41
6	Rest Room	12.96	12.96	0.01
7	Main Office Building	534.8	534.8	0.48
8	Store Room	921.1	921.1	0.82
9	Pallate Furnigation Shed	405.38	405.38	0.36
10	Weigh Bridge Office	12.25	12.25	0.01
11	Silo Storage Shed	500	500	0.45
12	Scrubber Silo	27	27	0.02
13	Loading/Unloading Shed	173.47	173.47	0.15
14	Neutralization Plant-1	1370.88	1370.88	1.22
15	Neutralization Plant-2	2087.29	2087.29	1.86
16	Spent Acid Tank and N ₂ Storage Tank	449.43	449.43	0.40
17	Spent Acid Tank	34.56	34.56	0.03
18	Cooling Tower	8.75	8.75	0.01
19	Granulation Plant	1672.56	1672.56	1.49
20	Acid Activation Plant-B	1297.45	1297.45	1.16
21	Acid Activation Plant	1200	1200	1.07
22	Granulation Plant	3069.08	3069.08	2.74
23	Electrical Control Board Room	126	126	0.11
24	Pulverization Plant	3369.91	3369.91	3.01
25	Acid Activation & B.T.X. Plant	1751.64	1751.64	1.56
26	Acid Activation & Acid Dilution Plant	1545.22	1545.22	1.38
27	Dryer Bin Shed	1346.37	1346.37	1.20
28	Dryer Plant	1107.86	1107.86	0.99
29	Pulverization Plant	1480.27	1480.27	1.32
30	Pilot plant Office	348.67	348.67	0.31
31	New Finished Goods Godown	1200	1200	1.07
32	Finished Goods Store	1591.4	1591.4	1.42
33	Finished Goods Godown	1413.98	1413.98	1.26
34	Boiler Shed, Lean to Shed, office, Canteen, Waste Material Storage Shed & W.C., Bath & Urinal Block	1687.23	1687.23	1.51
35	Electrical Panel Room, D.G Room & PCC Room	654.81	654.81	0.58
36	Hag Plant	194.38	194.38	0.17
37	Panel Room & Store RM	26.56	26.56	0.02
38	Pump House	75.68	75.68	0.07
39	Fuel & Acid Storage Tanks	960.67	960.67	0.86
40	Petcock Silo	276.31	276.31	0.25
41	Petcock Storage Shed	621.09	621.09	0.55
42	Gassifire	110.45	110.45	0.10
43	W.C. & Bath Block	28.6	28.6	0.03
44	Time Office	6.95	6.95	0.01
45	Maintenance Workshop	81.25	81.25	0.07
46	Paper Godown Shed	605.44	605.44	0.54
47	R.O. & U.F Shed	234.12	234.12	0.21
48	Filter Press Shed	145.86	145.86	0.13
49	Lime Treatment Plant	424.15	424.15	0.38

50	Clarifier Tank	129.36	129.36	0.12
51	Fire Pump House	18	18	0.02
52	Raw Material Yard	3336.24	3336.24	2.98
53	Lime Yard	2118.69	2118.69	1.89
54	Green Belt Area	8732	8732	7.80
55	Road & Open Area	48183.7	48183.7	43.02
56	Pond Area	13733.7	13733.7	12.26
	Survey No. 167 Total	1,11,994	1,11,994	100
Sr. No.	Survey No. 168 Name of Structures	Area in (sq. m.)	Required area in (Sq. m)	Percentage (%)
1	Sr. No 168 Building	3950.00	3950.00	9.96
2	Green Belt Area	1439.00	1439.00	3.63
3	Road & Open Area	34270.00	34270.00	86.41
	Survey No. 168 Total	39,659.00	39,659.00	100
Sr. No.	Survey No. 166 Name of Structures	Area in (sq. m.)	Required area in (Sq. m)	Percentage (%)
1	Storage Shed	621.22	621.22	1.53
2	Filtration Plant (2. Nos.)	671.31	671.31	1.66
3	Pump House	92.75	92.75	0.23
4	Neutralization Plant	801.25	801.25	1.98
5	P & D Section	5135.02	5135.02	12.68
6	Granulation, Dilution, Acid Activation Plant, Bin Are & Control Room	4815.99	4815.99	11.89
7	Acid Storage Tank Farm	623.09	623.09	1.54
8	Security Cabin (Main Gate)	59.57	59.57	0.15
9	FG Shed	2200	2200	5.43
10	MEE Shed & Utility	401	401	0.99
11	Raw Material Yard	2823.15	2823.15	6.97
12	Lime Yard	2443.27	2443.27	6.03
13	Green Belt Area	3117	3117	7.70
14	Road & Open Area	16695.38	16695.38	41.22
	Survey No. 166 Total	40,500	40,500	100

Sr. No.	Name of Structures	Area in (sq. m.)	Required area in (Sq.m)
1	Survey No. 167	40,500	40,500
2	Survey No. 168 (Building)	1,11,994	1,11,994
3	Survey No. 166	39,659.00	39,659.00
	Total	1,92,153.0	1,92,153.0

Comments:

SEAC has examined it w.r.t. to total monthly production, maximum products, manufactured per month, the total raw material required, weekly storage requirement of each raw material, their mode of storage, their compatibility (flammability, corrosive, toxic), area needed by each raw material, one week storage of finished goods. Area adequacy, from overall safety perspective, has been provided in proposal and is satisfactory.

12. **GREEN BELT CONDITIONS AND MEASURES ALONG WITH AREA:**

Total Plot area (Sq meter)	Total Green belt area (Sq meter)	% of Greenbelt
Survey Number 167: 111994 m ² Survey Number 166: 40,500 m ² Survey Number 168: 39,659m ²	Existing: 40,750 m ² + Proposed: 23660 m ² Total: 64410.5 m ²	Total 33%

Details of copy of permission letter of concern GIDC/ Panchayat/etc. for greenbelt development (in case of greenbelt development outside the premises: NA

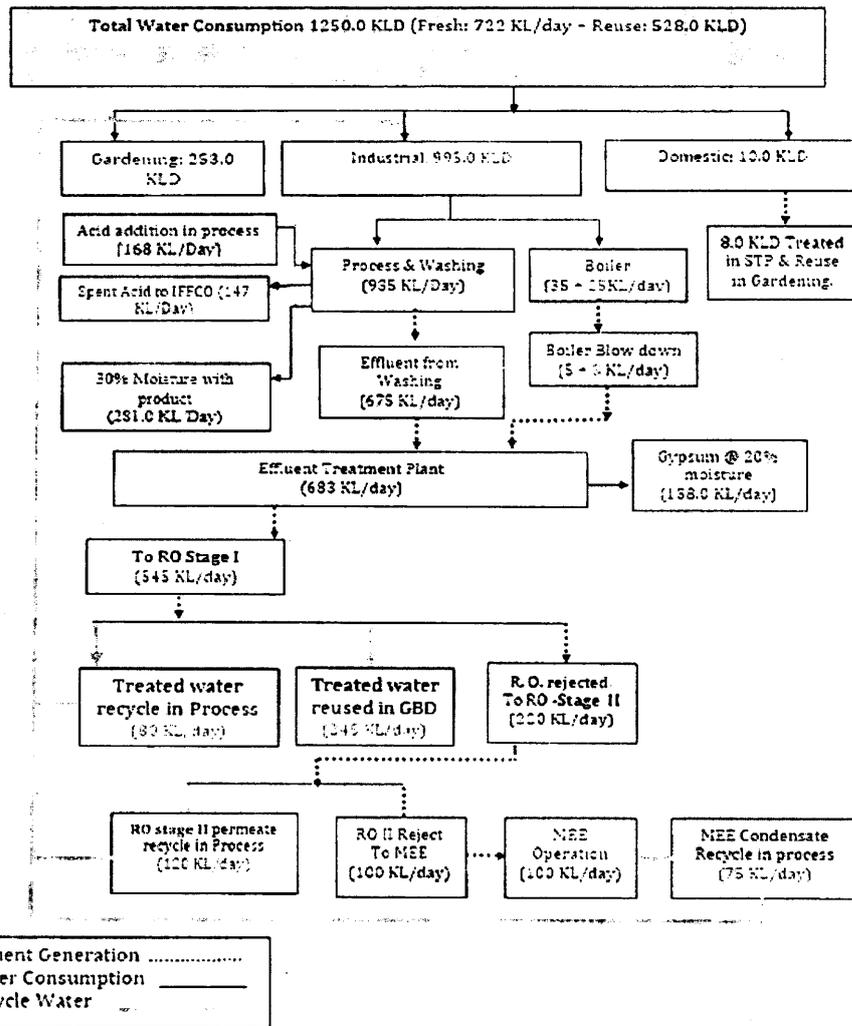
Comments:

The PP shall develop green belt within premises (64410.5 Sq. m i.e. 33% of the total plot area) as submitted before SEAC. Green belt shall be developed with native plant species that are significant and used for the pollution abatement as per the CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.

13. **EMPLOYMENT GENERATION:**

Permanent	Contractual	Total
560	350	910

14.	SOURCE OF WATER SUPPLY WITH QUANTITY AND PERMISSION (DETAILS OF CGWA IF BOREWELL) Source of water supply: GWIL, NO/GWIL/KUTCH/RENEWAL/2020-21/1274 Total Fresh water quantity (KLD): 722.0 KLD Permission of concerned authority (Name and quantity (in KLD): CGWA Authority, NOC no. CGWA/NOC/IND/REN/1/2023/8003, 118 M3/Day		
15.	WATER CONSUMPTION RELATED DETAILS WITH COMMENTS		
	Category	As per Valid CCA Water Consumption in KL/Day	Remarks
	Domestic	10.0	
	Gardening	245.0	
	Industrial		
	Process	935.0	
	Washing	0.0	
	Boiler	60.0	
	Cooling	0.0	
	Others (Scrubber)	0.0	
	Industrial Total	995.0	
	Grand Total (A+B+C)	1250.0	
	Note: Water consumption and waste water generation will remain same as per Existing EC & CTE. Comments: PP has submitted the above water consumption which is calculated considering the worst case scenario and in no case the water requirement shall not exceed the same which is found satisfactory.		
16.	WASTE WATER GENERATION AND DISPOSAL		
	Category	As per Valid CCA Waste Water Generation (KL/Day)	Remarks
	Domestic	8.0	
	Industrial		
	Process	537.0	
	Washing	0.0	
	Boiler	8.0	
	Cooling	0.0	
	Others (Scrubber)	0.0	
	Total Industrial waste water	545.0	
	Total [A + B]	553.0	
	Note: Water consumption and waste water generation will remain same as per Existing EC & CTE. Justification in case of increase/ drastic reduction in wastewater generation than water Consumption: Total Water Consumption is 1250 KI/day. Domestic consumption is 10 KL/day and Industrial consumption is 995 KL/day. Industrial Waste water generation is 545 KI/day and Domestic w/w generation is 8 KL/day. Treated wastewater is utilized for gardening purpose i.e., 245 KL/day. Water consumption in Process is 935 KI/day, out of which 147 KI/day is utilized for washing in Acid Activation and 281 KI/day as Moisture with product and 60 KI/day is utilized in Boiler for Steam generation. Comments: PP has submitted the above wastewater generation which is calculated considering the worst case scenario and in no case the wastewater generation shall not exceed the same which is found satisfactory.		
17.	SIMPLIFIED WATER BALANCE DIAGRAM		



Note:

Water consumption and waste water generation will remain same as per Existing EC & CTE.

As per Valid CCA:

The quantity of industrial water consumption 995 KLD (Fresh: 720.0 KLD+ Reuse: 275 KLD (RO Permeate: 200 KLD + MEE Condensate: 75 KLD).

Industrial Effluent Generation: 545 KLD.

18. BREAKUP OF WASTE WATER DISPOSAL (DOMESTIC & INDUSTRIAL BOTH)

Sr. no.	Quantity KLD	Facility
1	545.0	ETP, RO, MEE
2	8.0	STP & Reuse in Gardening
Total	553.0	

19. MECHANISM AND METHODOLOGY OF STREAM SEGREGATION

Industry Shall operate ETP followed by RO adequately so that treated industrial effluent shall be reuse / recycled within process.

Out of total RO permeate 445 KLD around 200 KLD Shall be reuse back into process along with MEE Condensate 75 KLD. Reject from RO-II 100 KLD shall be subjected to MEE.

Remaining RO Permeate 245 KLD conforming to above standards shall be discharged on land for greenbelt development within premises.

20. STP AND/OR ETP SPECIFICATION AND DESIGN AND ITS CAPACITY

STP: 8 KLD

Design Copy: 8.0 KLD

STP: Sewage generated during operation phase shall be treated in proposed STP and treated sewage will be reused for gardening purpose within premises.

21. TREATABILITY OF WATER

- Industry Shall operate ETP followed by RO adequately so that treated industrial effluent shall be reuse / recycled within process.
- Out of total RO permeate 445 KLD around 200 KLD Shall be reuse back into process along with MEE Condensate 75 KLD. Reject from RO-II 100 KLD shall be subjected to MEE.

➤ Remaining RO Permeate 245 KLD confirming to above standards shall be discharged on land for greenbelt development within premises.

22. SUMMARY OF WATER USE AND REQUIREMENT OF FRESH/REUSED WATER

Summary of water requirement	Quantity KLD	Remarks
Total water requirement for the project (A)	1250.0	
Quantity to be recycled (B)	528.0	
Total fresh water requirement (C)	- 722.0	
Ensure Total water requirement = Recycled water + Fresh water i.e. A = B + C		

23. REUSE, REDUCE, RECYCLE RECOVERY MEASURES ADOPTED

Reduce

Sr. No.	Item	Quantity	% percentage
-	-	-	-

Reuse

Sr. No.	Item	Quantity	% percentage
1	STP Treated	8.0 KLD	0.64
2	Reused in GBD	245.0 KLD	19.6

Recycle

Sr. No.	Item	Quantity	% percentage
1	RO Treated Recycle in process	80.0 KLD	6.4
2	RO Stage II Permeate Recycle in Process	120.0 KLD	9.6
3	MEE Condensate recycle in process	75.0 KLD	6.0

24. As Per Valid FLUE GAS EMISSION

SR. No.	Source of emission	Stack Height (Mtr)	Type of fuel	parameter	APCM
As Per Valid CCA-LIST OF FLUE STACK					
1.	Boiler 1 & 2 (3 TPH each) Existing				Removed
2.	Boiler 3 (6 TPH) Existing				
3.	Boiler 4 (6 TPH) Existing	33m Common Stack	Coal =16 MT/Day	PM, SO ₂ , NO _x	Air Pre Heater + Multi- Cyclone Separator + Bag Filter + Water Scrubber
4.	Boiler 5 (6 TPH) New		Coal =16 MT/Day	PM, SO ₂ , NO _x	
5.	D.G Set (500 KVA) Existing	11	HSD: 40 liter/hr	PM, SO ₂ , NO _x	Acoustic Enclosure
6.	D.G Set (630 KVA) Existing				Removed
7.	D.G Set (250 KVA) Existing				

Note:
There is not required any additional flue gas emission for violation application, it will remain same as per Existing EC.

Comments:
➤ The proposed fuel to be used is approved fuel for the requirement of the heat energy and proposed the Air Pollution Control measures and stack height so as to achieve the emission norms prescribed by the competent authorities are found satisfactory.

25. PROCESS GAS EMISSION

SR. NO.	Stack Attached to	Stack height	APCM	Parameter	Permissible Limit
As Per valid CCA Process Gas Emission Existing					



1.	Pulverizer 1&2	Removed			
2.	Pulverizer 3	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
3.	Pulverizer 4	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
4.	Pulverizer 5	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
5.	Pulverizer 6	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
6.	De Dusting System 1	Removed			
7.	Classifier				
8.	Floor cleaner				
9.	Dryer 1				
10.	Dryer 2	Removed			
11.	Dryer 3				
12.	DRYER 4 (stand by)				
13.	Dryer 5				
14.	Dryer 6	18 meter	Cyclone Separator+ Water scrubber	Particulate Matter	150 mg/Nm ³
15.	Dryer 7	18 meter	Cyclone Separator+ Water scrubber	Particulate Matter	150 mg/Nm ³
16.	HAG With Dryer- 5	20 Meter	Cyclone Separator	Particulate Matter	150 mg/Nm ³
Proposed					
17.	Pulverizer 8	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
18.	Pulverizer 9	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
19.	Pulverizer 10	15 meter	Cyclone Separator+ Bag Filter	Particulate Matter	150 mg/Nm ³
20.	Dryer-8 (3 TPH)	18 meter	Cyclone Separator+ Water Scrubber	Particulate Matter	150 mg/Nm ³
21.	Dryer-9 (3 TPH)	18 meter	Cyclone Separator+ Water Scrubber	Particulate Matter	150 mg/Nm ³
22.	Dryer-10 (3 TPH) Standby	18 meter	Cyclone Separator+ Water Scrubber	Particulate Matter	150 mg/Nm ³
23.	De Dusting System at crushing area	15 meter	Bag Filter	Particulate Matter	150 mg/Nm ³
24.	De Dusting System at Packing area	11 meter	Bag Filter	Particulate Matter	150 mg/Nm ³

Note:

There is not required any additional Process gas emission for violation application, it will remain same as per Existing EC.

Comments:

The proposed Air Pollution Control measures and stack height so as to achieve the emission norms prescribed by the competent authorities are found satisfactory.

26. **FUGITIVE GAS EMISSION**

- Process area will be fully covered.
- Periodic monitoring of work area will be carried out to check the fugitive emission.
- Proper ventilation in storage & production area shall be ensured.
- Water will be sprinkled to control particulate / dust emission from storage area.
- Greenbelt will be developed along the plant premises.
- De-dusting system will be provided.
- Airborne dust at all transfer operations/ points will be controlled either by spraying water or providing enclosures.
- All Transfer points will be fully closed.
- Transportation of raw materials & products will be carried out by trolley within premises and minimum manual materials handling will be carried, so the fugitive emission due to process activity and material handling will be minimized.

Comments:

The air pollution control measures proposed for fugitive gas emission are found satisfactory.

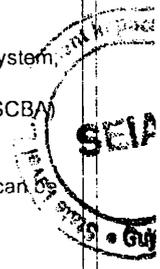
27. **HAZARDOUS PROCESSES AND ITS SAFETY MEASURES**

Types of process	Safety measures including Automation
Amination	Not Applicable, this is bleaching clay manufacturing Unit.
Bromination	--

	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="padding: 2px;">Chlorination</td></tr> <tr><td style="padding: 2px;">Hydrogenation</td></tr> <tr><td style="padding: 2px;">Nitration</td></tr> <tr><td style="padding: 2px;">Sulphonation</td></tr> <tr><td style="padding: 2px;">Others, if any</td></tr> </table>	Chlorination	Hydrogenation	Nitration	Sulphonation	Others, if any																															
Chlorination																																					
Hydrogenation																																					
Nitration																																					
Sulphonation																																					
Others, if any																																					
28.	SOLVENT MANAGEMENT (For example) Not Applicable, this is bleaching clay manufacturing Unit.																																				
29.	VOC EMISSION AND MITIGATION MEASURES FOR ACHIEVING MAXIMUM SOLVENT RECOVERY AND MINIMUM VOC GENERATION Not Applicable, this is bleaching clay manufacturing Unit.																																				
30.	LDAR PROPOSED Not Applicable, this is bleaching clay manufacturing Unit.																																				
31.	LDAR FOR SPECIFIC SOLVENT (For example) - Not Applicable, this is bleaching clay manufacturing Unit.																																				
32.	HAZARDOUS WASTE MANAGEMENT MATRIX <p style="text-align: center;">As per Valid CCA Hazardous Waste Details</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">SR.</th> <th style="width: 20%;">Type Of Waste</th> <th style="width: 15%;">Category</th> <th style="width: 15%;">Quantity MT/Year</th> <th style="width: 40%;">Mode Of Disposal</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ETP Sludge & MEE Salt</td> <td>I-35.3</td> <td>700 MT</td> <td>Collection, Storage, Transportation & Disposal at TSDF Site.</td> </tr> <tr> <td>2.</td> <td>Sludge from Wet Scrubber</td> <td>I-37.1</td> <td>NIL</td> <td>Collection, Storage, Transportation & send to cement industry for co-processing.</td> </tr> <tr> <td>3.</td> <td>Used/Spent Oil</td> <td>I-5.1</td> <td>1.0 MT</td> <td>Collection, Storage, Transportation & Disposal to registered recycler.</td> </tr> <tr> <td>4.</td> <td>Spent Acid</td> <td>B15-II</td> <td>66000 MT</td> <td>Collection, Storage, Transportation & send to cement industry for co-processing.</td> </tr> <tr> <td>5.</td> <td>Evaporation Residue</td> <td>I-37.3</td> <td>NIL</td> <td>Collection, Storage, Transportation & Disposal at TSDF Site.</td> </tr> </tbody> </table> <p>Note: There will no change in hazardous waste, it will remain same as per existing EC & CTE.</p> <p>Comments: <ul style="list-style-type: none"> ➤ Hazardous waste management includes collection, storage, transportation and disposal at TSDF, captive/ common incineration, co-processing/ pre-processing, sold to authorized actual users having Rule-9 permission and recycle/ reuse of waste. SEAC examined the details provided and found it as per requirement. </p>		SR.	Type Of Waste	Category	Quantity MT/Year	Mode Of Disposal	1	ETP Sludge & MEE Salt	I-35.3	700 MT	Collection, Storage, Transportation & Disposal at TSDF Site.	2.	Sludge from Wet Scrubber	I-37.1	NIL	Collection, Storage, Transportation & send to cement industry for co-processing.	3.	Used/Spent Oil	I-5.1	1.0 MT	Collection, Storage, Transportation & Disposal to registered recycler.	4.	Spent Acid	B15-II	66000 MT	Collection, Storage, Transportation & send to cement industry for co-processing.	5.	Evaporation Residue	I-37.3	NIL	Collection, Storage, Transportation & Disposal at TSDF Site.					
SR.	Type Of Waste	Category	Quantity MT/Year	Mode Of Disposal																																	
1	ETP Sludge & MEE Salt	I-35.3	700 MT	Collection, Storage, Transportation & Disposal at TSDF Site.																																	
2.	Sludge from Wet Scrubber	I-37.1	NIL	Collection, Storage, Transportation & send to cement industry for co-processing.																																	
3.	Used/Spent Oil	I-5.1	1.0 MT	Collection, Storage, Transportation & Disposal to registered recycler.																																	
4.	Spent Acid	B15-II	66000 MT	Collection, Storage, Transportation & send to cement industry for co-processing.																																	
5.	Evaporation Residue	I-37.3	NIL	Collection, Storage, Transportation & Disposal at TSDF Site.																																	
	NON-HAZARDOUS WASTE MANAGEMENT MATRIX <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Sr. no.</th> <th style="width: 25%;">Type/Name of non-hazardous waste</th> <th style="width: 30%;">Specific Source of generation (Name of the Activity, Product etc.)</th> <th style="width: 15%;">Quantity (MT/Ann um)</th> <th style="width: 20%;">Management of HW</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>STP Sludge</td> <td>From STP</td> <td>0.01</td> <td>Use as Manure in Gardening.</td> </tr> </tbody> </table> <p>Comments: <ul style="list-style-type: none"> ➤ Other wastes management includes collection, storage, transportation and disposal by selling to actual users and recycle / reuse of waste. SEAC examined the details provided and found it as per requirement. </p>		Sr. no.	Type/Name of non-hazardous waste	Specific Source of generation (Name of the Activity, Product etc.)	Quantity (MT/Ann um)	Management of HW	1	STP Sludge	From STP	0.01	Use as Manure in Gardening.																									
Sr. no.	Type/Name of non-hazardous waste	Specific Source of generation (Name of the Activity, Product etc.)	Quantity (MT/Ann um)	Management of HW																																	
1	STP Sludge	From STP	0.01	Use as Manure in Gardening.																																	
34.	STORAGE SAFETY MEASURES Storage of Hazardous chemicals in Tanks <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Sr. no</th> <th style="width: 30%;">Name of Chemical</th> <th style="width: 15%;">Capacity of Tank</th> <th style="width: 15%;">Number of Tanks</th> <th style="width: 30%;">Hazardous Characteristics of Chemical</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;">TANK FARM (NON-PESO)</td> </tr> <tr> <td>1</td> <td>Bentonite</td> <td>25 KL</td> <td>1</td> <td style="text-align: center;">--</td> </tr> <tr> <td>2</td> <td>Lime</td> <td>40 KL</td> <td>1</td> <td>Corrosive</td> </tr> <tr> <td>3</td> <td>Gypsum</td> <td>40 KL</td> <td>1</td> <td style="text-align: center;">--</td> </tr> <tr> <td>4</td> <td>Sulphuric Acid</td> <td>40 KL</td> <td>1</td> <td>Corrosive & Toxic</td> </tr> <tr> <td colspan="5" style="text-align: center;">TANK FARM (PESO)</td> </tr> </tbody> </table>		Sr. no	Name of Chemical	Capacity of Tank	Number of Tanks	Hazardous Characteristics of Chemical	TANK FARM (NON-PESO)					1	Bentonite	25 KL	1	--	2	Lime	40 KL	1	Corrosive	3	Gypsum	40 KL	1	--	4	Sulphuric Acid	40 KL	1	Corrosive & Toxic	TANK FARM (PESO)				
Sr. no	Name of Chemical	Capacity of Tank	Number of Tanks	Hazardous Characteristics of Chemical																																	
TANK FARM (NON-PESO)																																					
1	Bentonite	25 KL	1	--																																	
2	Lime	40 KL	1	Corrosive																																	
3	Gypsum	40 KL	1	--																																	
4	Sulphuric Acid	40 KL	1	Corrosive & Toxic																																	
TANK FARM (PESO)																																					



1	HSD	86 KL	2	Flammable
Safety Measures for PESO Underground storage tank farm:				
Storage of Hazardous chemicals other than Tanks i.e. Drum, Barrels, Carboys, Bags etc.				
Sr. no	Name of Chemical	Capacity of Drum/Bag/ Cylinder/ Glass Bottle	Number of Drum/Bag/ Cylinder/ Glass Bottle	Hazardous Characteristics of Chemical
There is no any Hazardous Chemicals used in this Bleaching Clay Manufacturing Unit.				
Safety measures for Hazardous Chemicals:				
Type of Hazardous Chemicals	Safety measures			
FLAMMABLE CHEMICALS	<p>Flammable Materials</p> <ul style="list-style-type: none"> • Storage shall be cool, well ventilated away from sources of ignition or heat. Prevent accumulation of static charge. Protect material from direct sunlight. • Store in original container. Keep containers tightly closed and upright when not in use. • Proper label and identification board /stickers shall be provided in the storage area. • Conductive drum pallets shall be provided. • Drum handling trolley / stackers/fork lift shall be used for drum handling. Separate dispensing room with local exhaust and static earthing provision shall be made. • Ground container and transfer equipment to eliminate static electric sparks. • Smoking and other spark, flame generating item shall be banned near storage area. FLP type light fittings shall be provided. • Handling of materials from Drum shall be done only through Mechanical Transfer System only. • Training shall be provided to employees for safe storage, handling and transpiration. • When using, do not eat, smoke or drink. • Fire Hydrant with monitor, fire proximity suits, automatic sprinkler system, Safety shower & eye wash unit shall be installed nearby area. • Provision of Respiratory protective equipment (airline respirator & SCBA) & personal protective equipment shall be available. • For spills involving small volumes of dilute solution of Xylene/Formaldehyde/Methanol, the following cleaning procedure can be used • Wear appropriate personal protective equipment (PPE) • Remove any ignition source from the spill area; • Clean the spill area with a mixture of water and soap • Dry the spill area with paper towels • Onsite emergency plan prepared and mock drill shall be carried out. Safety sign board displaying Do's and Don'ts in local language. 			
CORROSIVE CHEMICALS	<ul style="list-style-type: none"> • Preventing or minimizing contact between corrosive substances and skin, mucous membranes and eyes. • Corrosive substances shall not be allowed to come in contact with materials that may react. • All the containers, pipes, apparatus, installations and structures used for the manufacture, storage, transport or use of these substances shall be protected by suitable coatings, impervious to and unaffected by corrosives. • All containers or receptacles shall be clearly labelled to indicate their contents and shall bear the danger symbol for corrosives. • Adequate ventilation and exhaust arrangement whether general or local, shall be provided whenever corrosive toxic gases or dust are present. • Personal protective devices shall be used. • First aid treatment facilities shall be provided and all concerned shall be instructed to follow safe practices such as (a) Prolonged washing with water (b) Removing contaminated clothing (c) Seeking immediate medical help. Safety showers and eye washers shall be provided. 			
TOXIC CHEMICALS	--			



	<table border="1"> <tr> <td>REACTIVE CHEMICALS</td> <td>--</td> </tr> <tr> <td>Others, if any</td> <td>--</td> </tr> </table>	REACTIVE CHEMICALS	--	Others, if any	--																										
REACTIVE CHEMICALS	--																														
Others, if any	--																														
35.	<p>FIRE LOAD CALCULATION</p> <table border="1"> <tr> <td>Total Plot Area:</td> <td rowspan="7">This is TOR Application Will be incorporated in final EIA.</td> </tr> <tr> <td>Area utilized for Hazardous Chemicals Storage:</td> </tr> <tr> <td>Number of Floors:</td> </tr> <tr> <td>Water requirement for firefighting in KLD:</td> </tr> <tr> <td>Water storage tank provided for firefighting in KL:</td> </tr> <tr> <td>Details of Hydrant Pumps:</td> </tr> <tr> <td>Nearest Fire Station:</td> </tr> <tr> <td>Applicability of Off Site Emergency Plan:</td> <td></td> </tr> </table>	Total Plot Area:	This is TOR Application Will be incorporated in final EIA.	Area utilized for Hazardous Chemicals Storage:	Number of Floors:	Water requirement for firefighting in KLD:	Water storage tank provided for firefighting in KL:	Details of Hydrant Pumps:	Nearest Fire Station:	Applicability of Off Site Emergency Plan:																					
Total Plot Area:	This is TOR Application Will be incorporated in final EIA.																														
Area utilized for Hazardous Chemicals Storage:																															
Number of Floors:																															
Water requirement for firefighting in KLD:																															
Water storage tank provided for firefighting in KL:																															
Details of Hydrant Pumps:																															
Nearest Fire Station:																															
Applicability of Off Site Emergency Plan:																															
36.	<p>WORKERS SAFETY AND OCCUPATIONAL HEALTH MANAGEMENT</p> <p>-Unit has provided helmet, goggles, safety shoes, ear muff, Safety belt, hand gloves to employee and also provided OHC for employees.</p> <p>- The workers should be trained for proper use of PPEs</p> <p>- Safety measures in the form of Do and Don't Do should be displayed at strategic locations especially in local language and English.</p> <p>- First box should be provided at strategic locations within the plant.</p> <p>- List of important telephone numbers should be displayed in first aid room.</p> <p>First Aid</p> <p>Take the following steps to treat a worker with heat stroke:</p> <p>Move the sick worker to a cool shaded area.</p> <p>Cool the worker using methods such as.</p> <p>-Soaking their clothes with water</p> <p>-Spraying, sponging, or showering them with water</p> <p>-Fanning their body.</p> <p>Plans for Periodic medical checkup</p> <ul style="list-style-type: none"> Part time doctor is hired for regular health checkup of each employee. Pre-employment health check-up is followed by periodical health check-up with special attention to occupational health. Medical records of each employee are maintained in prescribed format as per Factory Act. Bronchitis and chest diagnostic of worker working near furnace, EOT crane operator and smoky environment after every six months. The health check-up will be conducted as per the pre-designed format which will include chest X-rays, Audiometry, Spirometry, Vision Testing, ECG, Blood and urine test etc. The work zone monitoring will be conducted on regular basis. <table border="1"> <tr> <td>Number of permanent Employee:</td> <td>560</td> </tr> <tr> <td>Number of Contractual person/Labour:</td> <td>350</td> </tr> <tr> <td>Area provided for OHC:</td> <td>20.0 Sq. Meter</td> </tr> <tr> <td>Number of First Aid Boxes:</td> <td>20</td> </tr> <tr> <td>Nearest General Hospital:</td> <td>G. K. General Hospital Approx. 12 km</td> </tr> <tr> <td>Name of Antidotes to be store in plant:</td> <td>Not Required</td> </tr> </table> <p>Comments:</p> <p>Project proponent has provided PPEs, Occupational health center (OHC) with adequate provision of manpower, equipment and operational cost. SEAC finds it as per the provisions of Gujarat Factory Rules 1963.</p>	Number of permanent Employee:	560	Number of Contractual person/Labour:	350	Area provided for OHC:	20.0 Sq. Meter	Number of First Aid Boxes:	20	Nearest General Hospital:	G. K. General Hospital Approx. 12 km	Name of Antidotes to be store in plant:	Not Required																		
Number of permanent Employee:	560																														
Number of Contractual person/Labour:	350																														
Area provided for OHC:	20.0 Sq. Meter																														
Number of First Aid Boxes:	20																														
Nearest General Hospital:	G. K. General Hospital Approx. 12 km																														
Name of Antidotes to be store in plant:	Not Required																														
37.	<p>DETAILS OF MEMBERSHIP OF COMMON FACILITIES:</p> <table border="1"> <thead> <tr> <th>Sr. No.</th> <th>Membership for Common Facility</th> <th>Membership Certificate issuing agency along with Date of Issue and validity of membership</th> </tr> </thead> <tbody> <tr> <td>01</td> <td>CETP</td> <td>Not required</td> </tr> <tr> <td>02</td> <td>TSDf site</td> <td>SEPPPL Certificate No. 1200000126 Date of issue: 09.09.2019</td> </tr> <tr> <td>03</td> <td>Common Hazardous Waste Incineration Facility</td> <td>Not required</td> </tr> <tr> <td>04</td> <td>Common Spray Drying Facility</td> <td>Not required</td> </tr> <tr> <td>05</td> <td>Common MEE Facility</td> <td>Not required</td> </tr> <tr> <td>06</td> <td>Common Conveyance System</td> <td>Not required</td> </tr> <tr> <td>07</td> <td>PESO permission</td> <td>For HSD Storage Vide Letter No. P/HQ/GJ/15/1947/(P12270) dated 07/10/2020</td> </tr> <tr> <td>08</td> <td>FIRE permission</td> <td>Will be incorporated in EIA Report</td> </tr> <tr> <td>09</td> <td>Health Certificate</td> <td>Will be incorporated in EIA Report</td> </tr> </tbody> </table>	Sr. No.	Membership for Common Facility	Membership Certificate issuing agency along with Date of Issue and validity of membership	01	CETP	Not required	02	TSDf site	SEPPPL Certificate No. 1200000126 Date of issue: 09.09.2019	03	Common Hazardous Waste Incineration Facility	Not required	04	Common Spray Drying Facility	Not required	05	Common MEE Facility	Not required	06	Common Conveyance System	Not required	07	PESO permission	For HSD Storage Vide Letter No. P/HQ/GJ/15/1947/(P12270) dated 07/10/2020	08	FIRE permission	Will be incorporated in EIA Report	09	Health Certificate	Will be incorporated in EIA Report
Sr. No.	Membership for Common Facility	Membership Certificate issuing agency along with Date of Issue and validity of membership																													
01	CETP	Not required																													
02	TSDf site	SEPPPL Certificate No. 1200000126 Date of issue: 09.09.2019																													
03	Common Hazardous Waste Incineration Facility	Not required																													
04	Common Spray Drying Facility	Not required																													
05	Common MEE Facility	Not required																													
06	Common Conveyance System	Not required																													
07	PESO permission	For HSD Storage Vide Letter No. P/HQ/GJ/15/1947/(P12270) dated 07/10/2020																													
08	FIRE permission	Will be incorporated in EIA Report																													
09	Health Certificate	Will be incorporated in EIA Report																													
38.	<p>EMERGENCY MEASURES PROPOSED AND PREPAREDNESS ACTION PLAN</p> <p>-Emergency telephone numbers should be available and display properly strategic locations.</p> <p>- Do's and Don'ts of Preventive Maintenance</p>																														



Nearest Fire station: Bhuj Fire Station Approx. 60.0 km
Nearest Hospital: G. K. General Hospital Approx. 13 km

39. CER ACTIVITIES PROPOSED YEAR WISE/ IN CASE OF EXPANSION ANY ADDITIONALITY SUGGESTED AND ITS COMPLIANCE (AS PER THE MOEF & CC GUIDELINES)

Details of CER

As per OM no. 22-65/2017 on dated 01/05/2018 regarding "Corporate Environment Responsibility" (CER), Brownfield projects have to contribute 1% of the Additional Capital Investment, the company will contribute funds for CER activities

Activities to be carried out under CER:

Education,
Health,
Environment,
Agriculture

FUND FOR CER ACTIVITIES	
Description	Amount
Work under Swachh Bharat Abhiyan in Bhujodi & Madhapar village	15.0
Construct wall on periphery of common Sport Complex of Madhapar village	10.0
Provide woolen clothes, shoes and sport equipment in the government school of Ler village	10.0
Fodder for animals of Ler village	5.0
Ambulance facility for the nearby villagers	10.0
TOTAL	50.0 Lakh

Comments:

As per MoEF&CC's OM dated: 01.05.2018 and 30.09.2020, SEAC examined that the proposed cost of CER i.e 1% (Rs 50 Lakhs) which is as per the requirement.

40. ENVIRONMENT MANAGEMENT PLAN (ESPECIALLY WITH CEPI AND NON CEPI GUIDELINES, AS MAY BE APPLICABLE)

Sr. No	Unit	Detail	Capital Cost (Rs. Lakhs)	Total Recurring Cost (Rs. In Lakhs per Annum)
1	Wastewater	ETP. RO & MEE	191	14.0
2	Air	Air Pre Heater + Multi-Cyclone Separator + Bag Filter + Water Scrubber, Cyclone Separator+ Bag Filter * 8 Nos. Cyclone Separator+ Water Scrubber * 7 Nos. Cyclone Separator * 1 nos. Bag Filter * 2 Nos.	280	17.0
3	Hazardous Management	Hazardous Waste Storage & Disposal to TSDF and Incineration site. Memberships Ship and Others	6.0	2.0
4.	Fire & Safety	PPEs; Fire Extinguishers; Fire Hydrant Line etc.		
5	Green Belt Development	Cost of 16*02.0 Nos. Trees and its plantation Charges	1.0	0.5
6.	Occupational Health	Pre & Post medical Checkup, First Aid Kits etc.	2.25	1.5
7.	Noise Control	Acoustic enclosure; Silencer; Vibration pads; Noise PPEs, etc.	0.75	0.1
8.	VOC Control & LDAR	Not Applicable, this is Bleaching clay Unit.	0.0	0.0
9	Environment Monitoring Program	Risk analysis, safety audit, maintenance expenses details, etc.	7.0	25
10	CER Activity	Work under Swachh Bharat Abhiyan in Bhujodi & Madhapar village Construct wall on periphery of common Sport Complex of Madhapar village Provide woolen clothes, shoes and sport equipment in the government school of Ler village Fodder for animals of Ler village	50.0	0.0

		Ambulance facility for the nearby villagers		
TOTAL			538	60.1
Comments:				
The overall environment management plan (EMP) provided for capital and recurring cost for wastewater treatment, air emission control, noise control, hazardous waste disposal, fire & safety, occupational health, environment monitoring program, green belt and corporate environmental responsibility was deliberated and found satisfactory.				
41.	RECOMMENDATIONS OF SEAC			
	"On the basis of information provided to SEAC on project, its location, technical, physical and environmental infrastructure, waste to be handled, raw material, storage, waste disposal, water treatment, safety measures, green belt development planning, regulatory compliance assured of related statutory provisions, necessary documents of requisite permissions provided from concerned departments and overall environmental management planning for the project, along with financial resources committed for operation and maintenance, and on the basis of presentation made before SEAC, modification suggested by SEAC and incorporated by project proponent, SEAC finds the project as per the requirement and unanimously recommends the same to SEIAA for grant of Terms of Reference"			
	<u>Considering the above project details, after detailed discussion, the following additional/ specific terms of reference (ToR) were prescribed in addition to the standard TORs/ model TORs available in the MoEFCC's sector specific EIA Manual for the "Mineral beneficiation" projects shall be considered as generic TORs for EIA study in addition to all the relevant information as per the generic structure of EIA given in Appendix III in the EIA Notification, 2006 to be done covering 10 Km radial distance from the project boundary of the proposed site</u>			
	<u>Specific Terms of Reference for the project on assessment of ecological damage, remediation plan and natural and community resource augmentation plan.</u>			
	<ol style="list-style-type: none"> 1. Proponent shall strictly adhere to final order and judgement that would be passed by the Hon'ble Supreme Court of India in Writ Petition (Civil) No. 1394 of 2023. 2. PP shall submit complete detail of Ecological Damage Assessment with respect to air, water, land and other project & location specific environment attributes. The collection and analysis of data shall be done by an environment laboratory duly notified under Environment (Protection) Act, 1986, or an environment laboratory accredited by NABL, or a laboratory of a council of Scientific and Industrial Research (CSIR) institution working in the field of environment. 3. The Environment Management Plan shall comprise of remediation plan and community & Natural Resource Augmentation plan corresponding to the ecological damage assessed and economic benefits derived due to violation. The remediation plan and the natural & community resource augmentation plan prepared shall be included as an independent chapter in the EIA report. 4. Proponent shall strictly adhere to all condition of SEAC recommendation dated 27.12.2024. 5. As per the SEAC recommendation, Committee observed wrt as per MoEF & CC's OM dated: 12.11.2020 regarding public hearing, there has been no increase in production or in any other parameter. The only reason for violation is the replacement of old line with new line, which was carried out in the plot/ land without prior permission of EC and no production has been taken using this newly laid pipeline. SEAC took note of provision made in the above quoted OM of MOEFCC, which does not make it mandatory to conduct the public hearing. Accordingly, Committee is of the opinion that public hearing is exempted as the unit has already carried out public hearing for manufacturing of bleaching clay and it is case of the replacement of the production line is as per the order of Hon'ble NGT. 6. The project proponent shall be required to submit a Bank guarantee equivalent to the amount of remediation plan and natural and community resource augmentation plan with the GPCB prior to the grant of EC. The quantification of such liability shall be recommended by the SEAC and finalized by the regulatory authority. 7. The bank guarantee shall be deposited prior to grant of EC and shall be released after successful implementation of the remediation plan and Natural and Community Resource Augmentation Plan, and after recommendation by IRO-MoEF&CC followed by recommendations of the SEAC and approval of the regulatory authority as per indicative guideline for calculating the amount of remediation plan and natural and community resource augmentation plan. 8. Project Proponent shall submit point wise compliance of Violation SoP in the final EIA report and during the appraisal of the Project. NABET accredited Consultant shall aptly use the 'Indicative Format for Implementation for Violation SoP dated 07.07.2021 and other related OMs recommended by SEAC to SEIAA for the purpose. 9. By Granting this ToR, it is made clear that no absolute right shall accrue in favour of project proponent and that all activities undertaken by project proponent based on ToR shall be subject to the final outcome of Hon'ble Supreme Court of India in Writ Petition (Civil) No. 1394 of 2023. 10. No equities shall be claimed by project proponent and all expenditures incurred hereto by project proponent based on ToR (violation) case, shall be at its own risk and cost and with full knowledge about pendency of proceedings before the Hon'ble Supreme court of India. 11. Actual period of violation and extent of violation with all supportive documents including actions taken by GPCB. 12. Ecological damage assessment with respect to air, water, land and other project & location specific environment attributes. The collection and analysis of data shall be done by an environment laboratory duly notified under Environment (Protection) Act, 1986, or an environment laboratory accredited by 			



- NABL, or a laboratory of a council of Scientific and Industrial Research (CSIR) institution working in the field of environment.
13. The Environment Management Plan shall comprise of the remediation plan and community & natural resource augmentation plan corresponding to the ecological damage assessed and economic benefits derived due to violation. The remediation plan and the natural & community resource augmentation plan prepared shall be included as an independent chapter in the EIA report.
 14. The project proponent shall be required to submit a bank guarantee equivalent to the amount of remediation plan and natural and community resource augmentation plan with the GPCB prior to the grant of EC. The quantification of such liability shall be recommended by the SEAC and finalized by the regulatory authority. The bank guarantee shall be deposited prior to grant of EC and shall be released after successful implementation of the remediation plan and Natural and Community Resource Augmentation Plan, and after recommendation by IRO-MoEF&CC followed by recommendations of the SEAC and approval of the regulatory authority. (The indicative guideline for calculating the amount of remediation plan and natural and community resource augmentation plan is attached at Annexure - 1)
 15. The project proponent shall submit the details of Penalty quantification as per MoEF&CC's OM dated: 07.07.2021.
 16. Assessment of environmental damage as per the prevailing guideline of MOEF&CC, orders of Honorable NGT, Courts regarding cases for violation issued from time to time.
 17. **The Project Proponent to comply in letter and spirit with the Violation SoP issued by MoEF & CC vide Office memorandum F.No.22-21/2020 – IA.III dated 07.07.2021, and subsequent related OMs issued by MoEF & CC on 28.01.2022, 28.07.2022. Further, a point wise compliance of the Violation SoP shall be submitted in the final EIA report and during the appraisal of the Project. NABET accredited Consultant shall aptly use the 'Indicative Format for Implementation for Violation SoP dated 07.07.2021 and other related OMs recommended by SEAC to SEIAA for the purpose.**
 18. **General & project specific Terms of Reference for the project.**
 19. Gujarat Pollution Control Board shall initiate credible legal action against the project proponent under the provisions of the Environment (Protection) Act, 1986, and further no consent to operate to be issued till the project is granted EC.
 20. A notarized undertaking stating that (1) Any such violation shall not be repeated in future, (2) All the statutory requirements shall be fully complied with and (3) A status quo shall be maintained at the project site and remaining activity shall be carried out only after obtaining Environmental Clearance from SEIAA.
 - i. Further Project Proponent may be advised to submit final EIA Report with EC application within 100 days from the date of issuance of this ToR to expedite processing of Environment Clearance application.
 - ii. The project proponent shall have to apply for Environmental clearance through online portal <http://environmentclearance.nic.in/> along with final EIA report.

Validity of ToR:

1. The ToRs prescribed for the project will be valid for a period of four years for submission of EIA & EMP report. ToR will lapse after 4 years from the date of issue.



(Ms. Maulika Shah)
Member Secretary

Encl: As Above

Issued to:

M/s. Ashapura Perfoclay Ltd.
Survey No. 167,166,168, Village: Ler,
Nr. Bhujodi, Anjar Bhuj Highway,
Ta: Bhuj, District: Kutch, Gujarat



Copy to:-

The Secretary, SEAC, C/O. G.P.C.B. Gandhinagar - 382010.



**ASHAPURA
PERFOCLAY LIMITED**

Date: 29/11/2025

BY HAND DELIVERY/RPAD

To,

Ms. Dipali Tank

(The Member Secretary),

State Level Environment Impact Assessment Authority

(SEIAA), Gujarat

Gujarat Pollution Control Board,

Paryavaran Bhavan,

Sector - 10-A,

Gandhinagar - 382010

**SUB: REPLY TO YOUR LETTER NO. SEIAA/GUJ/GEN-282/498/2025 DATED 26TH
NOVEMBER, 2025**

Respected Madam,

This has reference to above mentioned subject matter, we are submitting herewith Reply to your letter NO. SEIAA/GUJ/GEN-282/498/2025 Dated 26th November, 2025.

1. Whether the application has been submitted on parivesh portal 2.0.

Reply- We would like to inform you that we obtained Terms of Reference (TOR) Under Violation vide letter no. SEIAA/GUJ/TOR/2(b)/83/2025 dated 6th February, 2025. Based on this (TOR) Violation letter, we prepared the EIA Report for final submission on Parivesh 2.0 Portal.

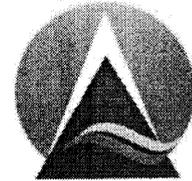
Unfortunately, we were not able to submit the EIA Report on Parivesh 2.0 In Portal. Parivesh Portal shows that as per Ministry's Notification S.O. 804 (E) dated 14th March 2017 and SOP dated 07th July 2021 have been struck down by the Hon'ble Supreme Court of India vide its order dated 16 May, 2025.

Registered & Corporate office: -

Jeevan Udyog Building, 3rd Floor, 278, D N Road, Fort, Mumbai - 400 001 (India)

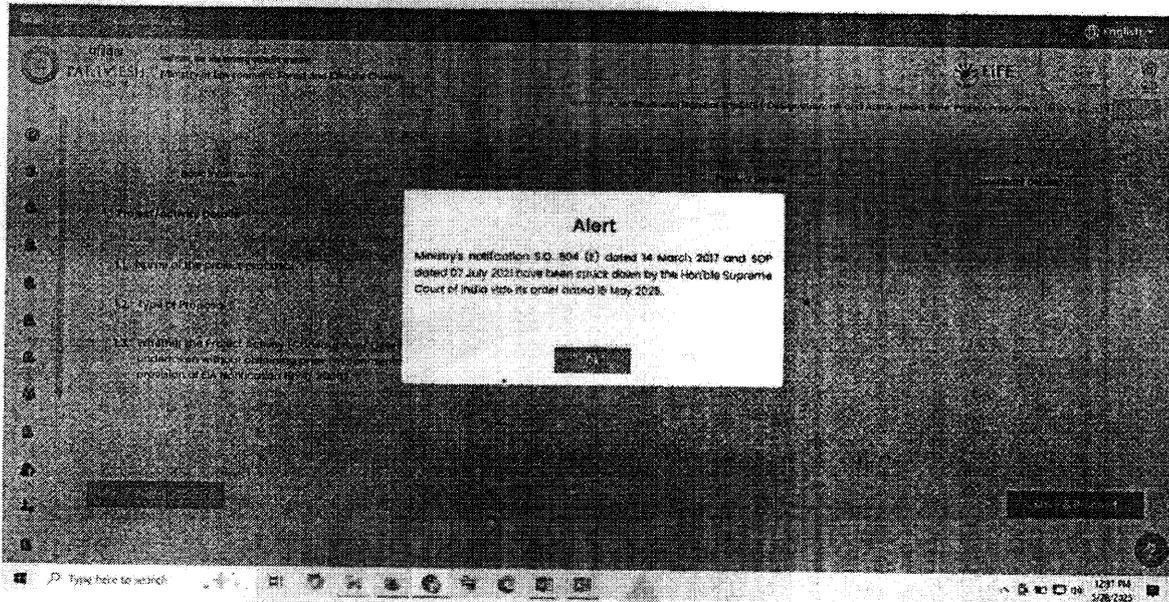
Tel. : +91 22 6665 1700 / www.ashapura.com / Email: be@ashapura.com

CIN No. U14108MH1997PLC107300



**ASHAPURA
PERFOCLAY LIMITED**

- Screenshot of the same is attached for your reference.



2. If submitted, the date of submission and Proposal Number.

Reply- Not Applicable, we have not submitted any Amendment/Expansion Application in Parivesh 2.0 Portal.

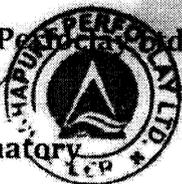
We hope you would find the same in order and oblige us by granting EC.

Thanking you.

Yours faithfully,

M/s. Ashapura Perfoclay Ltd.

Authorized signatory



Registered & Corporate office: -

Jeevan Udyog Building, 3rd Floor, 278, D N Road, Fort, Mumbai - 400 001 (India)

Tel. : +91 22 6665 1700 / www.ashapura.com / Email: be@ashapura.com

CIN No. U14108MH1997PLC107300



ASHAPURA
PERFOCLAY LIMITED

Date: 10/02/2026

To,

The Member Secretary,
State Level Expert Appraisal Committee,
Gujarat Pollution Control Board,
Paryavaran Bhavan,
Sector - 10-A,
Gandhinagar - 382010.

Subject: Physical submission of Environmental Clearance (EC) application along with EIA/EMP and request for processing in compliance with Hon'ble NGT and Hon'ble Supreme Court orders - reg.

Respected Sir/Madam,

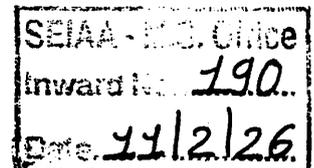
This is with reference to the above subject. We respectfully submit herewith the Environmental Clearance (EC) application along with the complete EIA/EMP Report, in physical form, for your kind consideration and necessary action.

We had submitted an online application dated 13.09.2023 for Terms of Reference (TOR) under Violation Category for addition of Survey Nos. 166 & 168 in the existing Mineral Beneficiation of Bleaching Clay Unit of M/s. Ashapura Perfoclay Ltd., located at Survey No. 167, Village Ler, Near Bhujodi, Anjar-Bhuj Highway, Taluka Bhuj, District Kutch, Gujarat, vide Proposal No. SIA/GJ/IND1/444162/2023 and File No. SIA/GJ/IND1/132609/2023 (refer Annexure-II), falling under Category B1-2(b). The project identification details: location map and site layout are enclosed at Annexure-I.

The proposal was considered in the SEAC meeting dated 07.02.2024, wherein the matter was deferred seeking clarification regarding applicability of MoEF&CC SOP dated 07.07.2021 and submission of land-related documents (refer Annexure-III).

Subsequently, the matter was adjudicated by the Hon'ble National Green Tribunal, and vide final judgment dated 03.12.2024, the Hon'ble Tribunal directed SEIAA/SEAC to consider and decide the application dated 13.09.2023, permitting the proposal to be processed under the Violation Category, subject to the final outcome of proceedings before the Hon'ble Supreme Court (refer Annexure-IV). The Hon'ble NGT relied upon its earlier order dated 29.11.2024 in OA No. 65/2019 (WZ) (refer Annexure-V), holding that applications submitted prior to the Hon'ble Supreme Court stay dated 02.01.2024 may be processed under the SOP dated 07.07.2021.

In compliance with the said judgment, we submitted a TOR Violation Reconsideration Application on 04.12.2024 (refer Annexure-VI). Thereafter, in the SEIAA meeting dated 29.01.2025, after detailed deliberation and legal opinion, the Authority accepted the recommendation of SEAC and decided to grant TOR under Violation Category (refer Annexure-VII).



Registered & Corporate office: -

Jeevan Udyog Building, 3rd Floor, 278, D N Road, Fort, Mumbai - 400 001 (India)

Tel. : +91 22 6665 1700 / www.ashapura.com / Email: be@ashapura.com

CIN No. U14108MH1997PLC107300



Accordingly, Terms of Reference (Violation) were granted vide Letter No. SEIAA/GUJ/TOR/2(b)/83/2025 dated 06.02.2025 (refer Annexure-VIII). Pursuant to the approved TOR, we have completed the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) strictly in accordance with the TOR conditions. The EIA/EMP Report addresses all standard and site-specific TOR conditions, including baseline data collection, impact assessment, mitigation measures, and compliance framework.

We are hereby submitting the complete EC application documents, including prescribed Forms, disclosures, undertakings, compliance statements and supporting enclosures, along with the EIA/EMP Report, as part of this physical submission (refer Annexure-IX and EIA/EMP Reports enclosed separately).

Despite repeated attempts, the PARIVESH 2.0 portal does not allow submission of the EC application, displaying a restriction indicating that MoEF&CC Notification S.O. 804(E) dated 14.03.2017 and SOP dated 07.07.2021 are presently subject to orders of the Hon'ble Supreme Court, thereby technically preventing online submission. A screenshot evidencing the said portal restriction is enclosed at Annexure-XII.

In this regard, we respectfully submit that the latest MoEF&CC Office Memorandum No. IA-J-3/7/2024-IA.III (Part-I) [E-254652] dated 20.01.2026 (refer Annexure-XI), issued in compliance with the Hon'ble Supreme Court orders, clearly directs that all projects which applied under OM dated 07.07.2021 and were pending as on 02.01.2024 may be processed, though final grant of EC shall be subject to further orders. Copies of the relevant Hon'ble Supreme Court orders are enclosed at Annexure-X.

Our project squarely falls under the permitted category for processing, as:

1. The TOR application was submitted on 13.09.2023, prior to the Hon'ble Supreme Court stay dated 02.01.2024.
2. TOR (Violation) has been lawfully granted by SEIAA after due appraisal (Annexure-VIII).
3. Processing is expressly supported by the Hon'ble NGT final judgment dated 03.12.2024 (Annexure-IV).
4. The complete EC application documents and EIA/EMP report have been duly prepared and submitted in accordance with approved TOR.
5. The MoEF&CC OM dated 20.01.2026 permits continuation of processing of such pending cases.



In view of the above facts, judicial directions, and prevailing legal position, we humbly request your good office to kindly accept this physical submission of the EC application along with EIA/EMP and proceed with appraisal, or issue appropriate directions for further processing, in compliance with the orders of the Hon'ble Supreme Court and Hon'ble NGT.

We request your kind intervention and early action in the matter.

Thanking you.



Yours faithfully,
For **M/s. Ashapura Perfoclay Ltd.**
Authorized Signatory
Name: D.S. TRIPATHI
Designation: HR & ADMIN HEAD
Mobile No.: 9925229042
Email: dstripathi@ashapura.com

ENCLOSURES: As per Index



INDEX OF ANNEXURES

Annexure No.	Description
Annexure-I	Project Identification & Basic Details including Project Brief, Location Map and Site Layout showing Survey Nos. 166, 167 & 168
Annexure-II	Copy of Online TOR Application dated 13.09.2023 with PARIVESH Acknowledgement, Proposal No. SIA/GJ/IND1/444162/2023 and File No. SIA/GJ/IND1/132609/2023
Annexure-III	SEAC Meeting Minutes dated 07.02.2024 highlighting deferment observations
Annexure-IV	Hon'ble National Green Tribunal Final Judgment dated 03.12.2024
Annexure-V	Relevant extract of Hon'ble NGT Order dated 29.11.2024 passed in OA No. 65/2019 (WZ)
Annexure-VI	TOR Violation Reconsideration Application dated 04.12.2024
Annexure-VII	SEIAA Meeting Minutes dated 29.01.2025 approving grant of TOR under Violation Category
Annexure-VIII	TOR (Violation) Letter No. SEIAA/GUJ/TOR/2(b)/83/2025 dated 06.02.2025
Annexure-IX	Environmental Clearance (EC) Application Documents including prescribed application forms, declarations, undertakings, compliance statements and supporting enclosures
Annexure-X	Copies of Hon'ble Supreme Court Orders dated 02.01.2024, 06.01.2025, 19.02.2025 & 18.11.2025
Annexure-XI	MoEF&CC Office Memorandum No. IA-J-3/7/2024-IA.III (Part-I) dated 20.01.2026
Annexure-XII	Screenshot of PARIVESH 2.0 portal showing restriction/error
Annexure-XIII	Land ownership / lease documents and Village Form 7/12 for Survey Nos. 166, 167 & 168
Annexure-XIV	EIA-EMP REPORT

C/c:

- ✓ 1. The Member Secretary,
State Environment Impact Assessment Authority (SEIAA), Gujarat.

F. No. 22-37/2018-IA.III
Government of India
Ministry of Environment, Forest and Climate Change
(IA-III Section)

Indira Paryavaran Bhawan,
Jor Bagh Road, New Delhi – 3

Dated: 23rd February, 2021

OFFICE MEMORANDUM

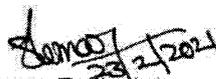
Sub: Processing of files for grant of Terms of Reference and Environmental Clearance through PARIVESH - reg.

The PARIVESH, a workflow based application, is being implemented in two phases with the first phase for facilitating online submission of proposals and tracking the status of such proposals at each stage of processing. The second phase involves online processing of these proposals subsequent to finalization of minutes by the EAC/SEAC and approval by the competent authorities through the PARIVESH portal. The Ministry vide D.O. letter dated 16th July, 2019 has directed to each SEIAAs for implementation of the PARIVESH.

2. It is has been observed that the compliance of the above direction and implementation of second phase of PARIVESH by the SEIAAs has not been satisfactory.

3. In view of the above, SEIAAs are directed to ensure that the files for approval of Terms of Reference (ToR) as well as Environmental Clearance (EC) are processed strictly through PARIVESH only from 1st March, 2021 onwards.

This issues with the approval of the competent authority.


(Sharath Kumar Pallana)
Director (CPC)

To

1. The Chairman, all the SEIAAs
2. The Member Secretary, all the SEIAAs

Copy to:

1. PS to Hon'ble Minister (EF&CC) / PS to Hon'ble MoS(EF&CC)
2. PPS to Secretary (EF&CC)
3. PPS to AS(RA)/AS(RSP)
4. PS to JS(GM)/ JS(SKB)

F. No 22-37/2018-IA III
Government of India
Ministry of Environment, forest and Climate Change
(IA-III Section)

Indira Paryavaran Bhawan
Jor Bagh Road, New Delhi-3

Dated: 19th April, 2021

OFFICE MEMORANDUM

Sub: Complete processing of applications for grant of Terms of Reference (ToR) and Environmental Clearance (EC) only through PARIVESH Portal - Regarding.

Ministry vide Office Memorandum even number dated 23rd February, 2021 directed SEIAA to ensure that files for approval of Terms of Reference (ToR) as well as Environmental Clearance (EC) be processed strictly through PARIVESH only from 01st March, 2021 onwards.

2. It is observed that some of the SEIAA/SEAC are still processing the file on physical mode which is making it difficult to monitor the pendency at state level.
3. In light of the above, all the SEIAAs/SEACs are directed once again to ensure that all files for approval of ToR as well as EC be processed strictly through PARIVESH only. It may be noted that non-adherence to the above direction may invite adverse action against the concerned SEIAA.

This issues with the approval of the Competent Authority


(Sharath Kumar Pallerla)
Director (CPC)

To

1. The Chairman, all the SEIAAs
2. The member Secretary, all the SEIAAs

Copy to:

1. PS to Hon'ble Minister (EF&CC)
2. PS to Hon'ble MoS (EF&CC)
3. PPS to Secretary (EF&CC)
4. PPS to AS (RA)/AS(RS)
5. PS to JS(SKB)
6. PS to DDG, NIC
7. Sr. Director, NIC at MoEFCC