

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

ORIGINAL APPLICATION NO. 09 OF 2026

IN THE MATTER BETWEEN:

Vasimbhai Aiyubhai Vahora & OthersApplicants

Versus

Karamsad Anand Municipal Corporation & OthersOpponents

I N D E X

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Total Pages: 27

Date: 27/04/2026

Place: Ahmedabad

Deepak Sanchela

Counsel for respondent no 1

M. No.: 9824045352

Email: deepaksanchela@gmail.com

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AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENTS NO. 1

I, SHAMJIIBHAI KOYABHAI GAR, Age: 54 yrs, The Deputy
VAL
Municipal Commissioner of Karamsad Anand Municipal Corporation,
respondent no 1 herein, does solemnly affirm and state on oath for
myself and on behalf of the corporation::

1. I have gone through the memo of the application and after perusing the relevant record, I am filing this reply explaining the real position of the issue in question and I reserve my right to file further reply in case of necessity so arises.
2. At the very outset, the answering Respondent tenders an unconditional and unqualified apology to this Hon'ble Tribunal for the failure to enter a formal appearance and for the non-appearance on the previous date of hearing. The Answering Respondent holds this Hon'ble Tribunal in the highest esteem, and the lapse was neither intentional nor a deliberate attempt to delay




Deputy Municipal Commissioner
Karamsad Anand Mahanagarpalika

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reserve my right to file further rejoinder in case of necessity so arises.

6. It is respectfully submitted that, the present Original Application is premature, based on an incomplete reading of statutory guidelines, and is liable to be dismissed. The primary grievance of the Applicants is that the answering respondent is establishing a Dead Animal Carcass Incinerator at Survey No. 2694 without a valid Consent to Establish (CTE)—is factually incorrect and has been rendered infructuous.
7. It is submitted that the Gujarat Pollution Control Board (GPCB) has duly scrutinized the project, the site layout, and the proposed pollution control measures. Following rigorous evaluation, the GPCB has formally granted the **Consent to Establish (CTE No. 152999)** vide Order No. GPCB/CTE-AND-433/ID-121236 dated 03/02/2026 for the said facility. A copy of the CTE dated 03/02/2026 is annexed hereto and marked as **ANNEXURE R1**.
8. It is respectfully submitted that, historically, the said portion of land was used as the disposal site for the dead animal carcasses, by burying the same in the pits dug on the said land. Over time, owing to space constraints and the risk of groundwater contamination, a scientific disposal mechanism became imperative and accordingly General Board Resolution No. 12 dated 16/05/2025 came to be passed by the Karamsad Anand Municipal Corporation to install the 9 MT/Day (500 kg/hr) modern incinerator on the said land, which is a vital upgrade to




Deputy Municipal Commissioner
Karamsad Anand Mahanagarlika

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safeguard the city's sanitation and the said resolution is never challenged by the applicants and had attained finality, also the Answering Respondent, bearing its statutory duty under the Gujarat Provincial Municipal Corporations Act, 1949, proposed this facility as an urgent public health necessity. Copy of the general board resolution no 12 dated 16/05/2025 is annexed herewith and marked as Annexure-R2.

9. It is also deserved to submit that, pursuant to the application of the present deponent for grant of CTE, the GPCB has raised some queries, which came to be replied by the present deponent 20/01/2026 explaining every aspect of the project and the copy of the same is annexed herewith and marked as Annexure-R3 as well as the copy of the site map is annexed herewith and marked as Annexure-R4.

10. It is respectfully submitted that, the GPCB, fully cognizant of the site's proximity to the Al Mannan Residency, granted the CTE by imposing exceptionally strict operational standards to guarantee zero impact on the surrounding environment also as per Condition 3.1 of the CTE, the facility is strictly mandated to use **Natural Gas (300 M³/Day)** as fuel, eliminating the particulate matter, soot, and smoke associated with conventional fuels.

11. It is also further submitted that, the Answering Respondent has submitted a comprehensive "Odour Action Plan" on 20.01.2026, which has been approved and incorporated into the CTE (Condition 1.7) to ensure absolute odour control, further The



Deputy Municipal Commissioner

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facility is designed as a Zero Liquid Discharge (ZLD) unit for industrial effluent. The minor 2 KL/Day effluent from washing/scrubbing will be treated in an onsite ETP and utilized exclusively for plantation within the premises.



12. That at the time of the NGT inspection and the filing of the OA, the Answering Respondent was merely undertaking preliminary civil works (platform and shed construction) as per the work order dated 10.09.2025. No machinery was installed, nor was any hazardous activity commenced prior to the grant of the CTE.

13. That the Answering Respondent is a responsible civic body and undertakes to strictly adhere to every specific and general condition outlined in the CTE granted by the GPCB. The project poses no threat to the residents; rather, halting it will trigger a severe sanitary crisis within the municipal limits.



14. It is respectfully submitted that, looking to the above-mentioned facts and circumstances the present application being devoid of any merits and hence same is deserved to be rejected in the interest of justice.

What is stated herein above is true to the best of my knowledge, information and belief and I believe the same to be true and correct.

Solemnly affirmed on this 24th day of April, 2026 at Anand.

Date: **24 APR 2026**
DATE:
REG. No.: 1136
BEFORE ME

Place: Anand
Mukesh C. Jethva
MUKESH.C. JETHVA
NOTARY
GOVT. OF GUJARAT

[Signature]
Deputy Municipal Commissioner
Karamsad Anand Mahanagarpalika
(DEPONENT)

MUKESH .C. JETHVA
Advocate, Notary (Govt. of Guj.)
Ekta Chambers, Nr. Railway Godi,

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Annx-R1

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GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152

By speed post

"Consent to Establish"

CTE NO: 152999

NO: GPCB/CTE-AND-433/ID-121236/ ૪૧૨૬૨૭

Date: ૦૩/૦૨/૨૦૨૬

To,
M/s. Karamsad Anand Municipal Corporation,
Survey No: 2694, Nr. Samarkha chokdi,
Tal & Dist: Anand-388001.

કરમસદ આનંદ મહાનગરપાલિકા
જ.આ.નં.....૨૬૩.....
તારીખ.....૧૫/૦૨/૨૦૨૬.....

Sub: Consent to Establish (NOC) under Section 25 of Water Act, 1974 and Section 21 of Air Act, 1981.

Ref: Your online Consent to Establish (NOC) application Inward No.427910 dated: 19/12/2025.

Sir,

Without prejudice to the powers of this Board under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981 and the Environment (Protection) Act, 1986 and without reducing your responsibilities under the said Acts in any way, this is to inform you that this Board grants Consent to Establish (NOC) to establish common environment management facility for dead animal carcass incineration at **M/s. Karamsad Anand Municipal Corporation, Survey No: 2694, Nr. Samarkha chokdi, Tal & Dist: Anand-388001.** for the manufacturing of the following item with following terms & conditions. The Validity period of the order will be up to **18/12/2032.**

Dy. MCO. (E)

No.: 452

712136

Sr. No.	Product	Capacity
1.	Dead Animal Carcass Incinerator	9 MT/Day

Specific Conditions:

- 1.1 Applicant shall have to obtain Environment Clearance from the relevant authority, if at any stage project activity is covered under the EIA Notification dated: 14/09/2006 and subsequent amendments, if applicable.
- 1.2 Applicant shall obtain prior permission of Central Ground Water Authority for withdrawal of ground water/use of borewells, if applicable.
- 1.3 Management of Solid Waste generated from industrial activities shall be as per Solid Waste Management Rules, 2016 (solid waste as defined in Rule-3(46)).
- 1.4 As per provision of Rule - 18 of Solid Waste Management Rules-2016 all industrial units using fuel and located within 100 km from the refused derived fuel (RDF) plant shall made an arrangement to replace at least five percent of their fuel requirement by refused derived fuel so produced.
- 1.5 Applicant shall have to comply with CPCB guideline for carcass disposal of Novermebr-2020 as amended time to time.

09/02/2026
Sanitation
dept.

GPCB ID-121236

Clean Gujarat Green Gujarat

1 of 5

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

CMCSBM
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10/2/2026

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- 1.6 Applicant shall have to ensure safe and effective waste/carcass collection and its further transportation to the site.
- 1.7 Applicant shall have to implement odour action plan as submitted on 20/01/2026 and ensure surrounding atmosphere may not be affected due to storage and incineration activity of carcass.
- 1.8 Applicant shall ensure complete combustion of carcass.

2. CONDITION UNDER THE WATER ACT, 1974:

2.1 The water consumption and waste water generation shall be as under:

Type	Water Consumption	Waste Water Generation
Industrial	2 KL/Day	2 KL/Day
Domestic	1 KL/Day	0.80 KL/Day
Gardening	Nil	Nil

- 2.2 The total quantity of the industrial effluent to be generated from the washing and scrubbing shall not exceed **2 KL/Day**.
- 2.3 Generated industrial effluent shall be treated into adequate ETP and treated effluent shall be utilized on land for gardening/plantation purpose within plant premises conforming to following standards:

Sr. No.	Parameter	Permissible Limit
1.	Suspended Solids	200 mg/l
2.	Total Dissolved solid	2100 mg/l
3.	pH	5.5 to 9
4.	BOD (3 days at 27°C)	100 mg/l
5.	Arsenic	0.2 mg/l
6.	cyanide	0.2 mg/l
7.	Chloride	600 mg/l

- 2.4 The total quantity of the domestic wastewater (sewage) shall not exceed **0.80 KL/Day**.
- 2.5 Sewage shall be disposed of through septic tank/soak pit system.
- 2.6 The board reserves right to review and/or revoke the consent and/or make modifications in the conditions which it seems fit in accordance with provisions of Water Act, 1974.

3. CONDITIONS UNDER AIR ACT, 1981:

3.1 The following shall be used as fuel in Dead Animal Carcass Incinerator System.

Sr. No.	Fuel	Quantity
1.	Natural gas	300 M ³ /Day

- 3.2 The applicant shall install & operate air pollution control system in order to achieve norms prescribed herewith.
- 3.3 The flue gas emission through stack attached to Dead Animal Carcass Incinerator System shall conform to the following standards:



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152

Sr. No.	Stack Attached To	Stack Height	APCM	Parameter	Permissible Limit
1.	Dead Animal Carcass Incinerator System-0.70 (Kcal/Hour)	30 Meter	Wet Scrubber, Venturi, recirculation tank	Particulate Matter	50 mg/Nm ³ (half hourly avg. value)
				HCL	50 mg/Nm ³ (half hourly avg. value)
				SO ₂	200 mg/Nm ³ (half hourly avg. value)
				CO	100 mg/Nm ³ (half hourly avg. value)
				Total organic Carbon	20 mg/Nm ³ (half hourly avg. value)
				HF	4 mg/Nm ³ (half hourly avg. value)
				NO _x	400 mg/Nm ³ (half hourly avg. value)
				Total dioxins and furans	0.1 ng TEQ/Nm ³
				Cd+ Th+ their compounds	0.05 mg/Nm ³
				Hg and its compounds	0.05 mg/Nm ³
				Sb+ As+Pb+Cr+Co+ Cu+Mn+Ni+V+ their compounds	0.5 mg/Nm ³

- 3.4 There shall be no process gas emission from the manufacturing activities as well as any other ancillary industrial operations.
- 3.5 Stack monitoring facilities like port hole, platform/ladder etc., shall be provided with stacks/vents Chimney in order to facilitate sampling of gases being emitted into the atmosphere.
- 3.6 There shall be no any fugitive emission and/or odour pollution due to manufacturing activities and ancillary operations. Adequate measures shall be taken thereof.
- 3.7 The concentration of the following parameters in the ambient air within the premises of the industry and a distance of 10 meters from the source (other than the stack/vent) shall not exceed the following levels. Applicant shall comply with the National Ambient Air Quality Standards notified by Central Pollution Control

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Board, New Delhi time to time under the provision of the Environment (Protection) Act, 1986.

Parameter	Permissible Limit Annual	Permissible Limit 24 Hrs. Average
Particulate matter-10 [PM10]	60 Microgram/M ³	100 Microgram/M ³
Particulate matter-2.5 [PM2.5]	40 Microgram/M ³	60 Microgram/M ³
Sulphur Dioxide	50 Microgram/M ³	80 Microgram/M ³
Nitrogen Dioxide	40 Microgram/M ³	80 Microgram/M ³

3.8 All measures for the control of Environmental pollution shall be provided before commencing production.

4. CONDITIONS UNDER HAZARDOUS AND OTHER WASTES (M&TM) RULES, 2016

- 4.1 Applicant shall have to comply with provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and its amendments.
- 4.2 The applicant shall provide temporary storage facilities for each type of Haz Waste as per Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2016 and its amendments.
- 4.3 Hazardous Waste generated shall be disposed off in accordance with the Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2016 and its amendments and unit shall have to obtain authorization of the Board for all applicable categories of Hazardous wastes.
- 4.4 The applicant shall obtain membership of common TSDF site for disposal Hazardous Waste as categorized in Hazardous and Other Waste (Management & Transboundary Movement) Rules, 2016 and its amendments.
- 4.5 The applicant shall explore possibilities of Co-processing of hazardous waste at authorized Cement kiln and make arrangement thereof OR The applicant shall obtain membership of Common Hazardous Waste incinerator for disposal of incinerable waste.
- 4.6 The applicant shall explore possibility and apply for authorization for recovery / reuses of any Hazardous Wastes.

5. GENERAL CONDITIONS:


- 5.1 Adequate plantation shall be carried out all along the periphery of the industrial premises in such a way that the density of plantation is at least 1000 trees per acre of land and a green belt of 10 meters width is developed.

**GUJARAT POLLUTION CONTROL BOARD**

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

-
- 5.2 In case of change of ownership/management the name and address of the new owners/partners/directors/proprietor should immediately be intimated to the Board.
- 5.3 Applicant shall however, not without the prior consent of the Board bring into use any new or altered outlet for the discharge of effluent or gaseous emission or sewage waste from the proposed industrial plant. The applicant is required to make applications to this Board for this purpose in the prescribed forms under the provisions of the Water Act, 1974, the Air Act, 1981 and the Environment (Protection) Act, 1986.
- 5.4 The concentration of Noise in ambient air within the premises of industrial unit shall not exceed following levels:
Between 6 A.M. and 10 P.M. : 75 dB(A)
Between 10 P.M. and 6 A.M. : 70 dB(A)
- 5.5 Applicant is required to comply with the Manufacturing, Storage and Import of Hazardous Chemicals Rules, 1989 framed under the Environment (Protection) Act-1986.
- 5.6 If it is established by any competent authority that the damage is caused due to their industrial activities to any person or his property in that case, they are obliged to pay the compensation as determined by the competent authority.

For and on behalf of
Gujarat Pollution Control Board


(B.D. Prasad)
Environmental Engineer

શહેરી વિકાસ અને શહેરી ગૃહ નિર્માણ વિભાગ, સચિવાલય, ગાંધીનગરના નોટિફિકેશન ક્રમાંક નં. KV-13 of 2025 - UDUHD/COC/e-file/18/2024/6139/P Section, સચિવાલય, ગાંધીનગર, DA.01/01/2025 થી આણંદ નગરપાલિકાને આણંદ મહાનગરપાલિકા જાહેર થવાથી, આણંદ મહાનગરપાલિકાના નિયુક્ત વહીવટદારશ્રીને જી.પી.એમ.સી. એક્ટ ૧૯૪૯ ની કલમ-૭૫ની પેટા કલમ(૧)ના કલોઝ(૨) નીચે મળેલી સત્તાઓ તથા ફરજો મુજબ

સામાન્ય સભા ઠરાવ નં.૧૨

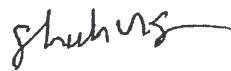
તા.૧૬/૦૫/૨૦૨૫

મ્યુનિ.કમિશ્નરશ્રીનો પત્ર નં.MCO/ADM/01/2025-26/04

તા.૧૫/૦૫/૨૦૨૫ની દરખાસ્ત જોઈ

ઠરાવ કર્યો કે, સેનિટેશન વિભાગના રિપોર્ટ મુજબ આગામી સમયમાં મુસ્લિમોનો બકરી ઈદનો તહેવાર આવતો હોય, મુસ્લિમ સમુદાય દ્વારા બકરીની કુરબાની આપતા હોય, બકરીની કુરબાની બાદ નીકળતો લાધો (જાનવારોનો કટીંગ કર્યા બાદનો વેસ્ટ) અત્રેથી ઘણા વર્ષોથી સામરખા ચોકડી પાસે આવેલ કતલખાનાવાળી જગ્યાએ ખાડા ખોદી દાટીને નિકાલ કરવામાં આવે છે. પરંતુ હાલ સદર સ્થળે જુની દાટેલી જગ્યા ઉપર જુનો દાટેલ લાધો (જાનવારોનો કટીંગ કર્યા બાદનો વેસ્ટ) બહાર નીકળે છે જેથી ખાડો ખોદી શકાય તેમ ન હોય, તેમજ સદર સ્થળની આજુ-બાજુમાં આવેલ દુકાનોના માલિકો દ્વારા ખુબજ વિરોધ કરવામાં આવેલ હોય જેથી બકરી ઈદ તહેવાર નિમિત્તે બકરીની કુરબાની બાદ નીકળતા લાધો (જાનવારોનો કટીંગ કર્યા બાદનો વેસ્ટ)ના નિકાલ અર્થે અત્યારથી બીજી અન્ય કોઈ જગ્યા નક્કી કરી કરવા અન્યથા સદર કામગીરી માટે મોટું ઇન્સીનરેટર પ્લાન્ટ સામરખા ચોકડી પાસે આવેલ જૂના કતલખાના વાળી જગ્યાએ તાત્કાલિક અસરથી ઇન્સ્ટોલ કરવામાં આવે તો, સદર બકરીની કુરબાની બાદ નીકળતો લાધો (જાનવારોનો કટીંગ કર્યા બાદનો વેસ્ટ)નો કાયમી નિકાલ થઈ શકે તેમ છે. સદર ઇન્સીનરેટર મશીનના કોટેશન મુજબ ૫૦૦ કી.ગ્રા./કલાક ની કેપીસીટીના ઇન્સીનરેટર મશીનનો અંદાજિત ખર્ચની રકમ રૂા.૧,૧૧,૦૦,૦૦૦/- પુરાને મંજૂરી આપવામાં આવે છે તેમજ સદર ખર્ચની રકમ સ્વલંબીત/ગ્રાન્ટમાંથી કરવા મંજૂર તેમજ આગળની નિયમોનુસારની કાર્યવાહી કરવા મ્યુનિસિપલ કમિશ્નરશ્રી, આણંદને સત્તા આપવાની ભલામણ મંજૂર કરવામાં આવે છે.

ખરી નકલ



રીડર



મ્યુનિસિપલ સેક્રેટરી

નકલ રવાના મ્યુનિ. કમિશ્નરશ્રી તરફ

માહિતી અધિકારી અધિનિયમ
હેઠળ માંગેલ માહિતીની નકલ
કરમસદ આણંદ મહાનગરપાલિકા



KARAMSAD ANAND MUNICIPAL CORPORATION

કરમસદ આણંદ મહાનગરપાલિકા

SANITATION
DEPARTMENTસેનિટેશન
વિભાગ

જાવક નં. DYMC/SI/2026/૩૩

તા. ૨૦/૧/૨૦૨૬

B D Prasad,
Unit Head- Anand District,
Gujarat Pollution Control Board,
Paryavaran Bhavan, Sector 10 A,
Gandhinagar.

Subject: Submission of Clarifications/Documents for CTE-Fresh Application (Inward No. 427910)

Respected Sir,

Karamsad Anand Municipal Corporation (Application ID: 121236), have applied for CTE-Fresh vide Inward No. 427910 dated 19/12/2025.

With reference to the above subject, we would like to inform you that Karamsad Anand Municipal Corporation (Application ID: 121236) has applied for CTE-Fresh vide Inward No. 427910 dated 19/12/2025. Further, with reference to your communication regarding submission/clarification of certain points, we hereby submit the required information and clarifications as sought. The point-wise details and supporting documents are enclosed herewith for your kind perusal and record.

We kindly request you to consider the submitted clarifications/documents and take further necessary action at your end at the earliest.

Answer Copy Enclose

1. Technical details of Incinerator along with temperature and other specification for ensuring complete combustion/incineration, Air Pollution control Measures and its details, capacity of incinerator etc (ANNEXURE 1).
2. Odour control action plan so that surrounding atmosphere may not be affected due to proposed activity of storage and incineration of carcass (ANNEXURE-2)
3. Compliance of CPCB Guidelines for Carcass Disposal (November-2020) for specific points pertaining to incineration.(ANNEXURE – 3)
4. Action plan for safe and effective waste/carcass collection and transportation to the site.(ANNEXURE-4)
5. Land possession documents shows proposed site usage for slaughter house hence submit compliance status for siting criteria for the proposed activity as per local authority rules & regulation as this is common facility of local government for carcass incineration (i.e Anand Nagarpalika) (ANNEXURE-5)
6. As per IR, More than 15 pucca residential houses in a cluster are observed within a 500-meter radius of the proposed site. Al Manan Residency (residential society) having more than 15 pucca houses in a cluster is situated adjacent to the proposed site on the western side. Residential areas comprising more than 15 pucca houses in a cluster are also observed within a 500-meter radius in the south-eastern direction of the proposed site. Hence clarify. (ANNEXURE-6)

Deputy Municipal Commissioner
Karamsad Anand Municipal Corporation



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ANNEXURE - 1Technical Details of Animal Carcass Disposal Incinerator**1. Type of Incinerator**

- **Dual-chamber (Controlled Air) Incinerator** designed specifically for Animal Carcass Disposal Incinerator.
- Comprising:
 - **Primary Combustion Chamber**
 - **Secondary Combustion Chamber**
- Fully enclosed, refractory-lined construction to withstand high temperatures and ensure complete destruction of organic matter and pathogens.

2. Incinerator Capacity

- **Rated Capacity:** 500 to 700 Kg/Hour (Animal Carcasses)
- Designed to handle peak carcass generation without overloading.
- Batch / semi-continuous operation as per requirement.

3. Combustion Temperature & Retention Time

Component	Operating Parameter
Primary Chamber Temperature	850-900 °C
Secondary Chamber Temperature	1150-1200°C
Gas Residence Time (Secondary Chamber)	Minimum 2 seconds

These parameters ensure complete combustion, destruction of pathogens, and minimization of odour and toxic emissions.

4. Fuel and Combustion Control

- **Primary Fuel:** Diesel / LDO / PNG (as applicable) for start-up and temperature maintenance.
- Automatic burners with interlocks to ensure:
 - No feeding below minimum temperature
 - Stable flame and controlled air supply
- Electrical Control System for proper temperature and combustion efficiency.

5. Feeding and Ash Handling System

- Hydraulic Charging Door with safety interlocks.
- Controlled feeding rate to prevent smoke and odour generation.
- Bottom ash collected in sealed containers.
- Ash handled and disposed of as per CPCB/GPCB-approved method.

6. Air Pollution Control Measures (APCMs)

6.1 Secondary Combustion Chamber

- Ensures oxidation of unburnt hydrocarbons, VOCs, and odorous gases.

6.2 Air Pollution Control Devices

APCM	Function
Wet Scrubber / Venturi Scrubber	Removal of particulate matter, acid gases
Packed Bed Scrubber	Odour and gas absorption
Mist Eliminator	Removal of moisture droplets
Induced Draft (ID) Fan	Maintains negative pressure
Stack	Safe dispersion of treated flue gases

7. Stack / Chimney Details

- **Stack Height:** 30 meters (as per CPCB/GPCB norms)
- Designed to ensure adequate dispersion of emissions.
- Sampling port provided as per CPCB/GPCB guidelines.

8. Emission Control and Compliance

- Incinerator designed to meet CPCB/GPCB emission standards for:
 - Particulate Matter
 - Smoke opacity
 - Odour control
- Continuous temperature monitoring provided for both chambers.

9. Odour Control Provisions

- Negative pressure maintained in storage and incineration areas.
- All process gases routed through APCMs.
- Rapid transfer of carcasses from storage to incinerator to avoid decomposition.

10. Safety and Interlocks

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- Automatic shutdown on:
 - Low temperature
 - Burner failure
 - Power failure
- Emergency stop and fire-fighting provisions provided.
- Operators trained in safe incinerator operation.

11. Compliance Statement

The incinerator is designed and operated to ensure:

- Complete combustion of carcasses
- Destruction of pathogens
- Effective odour and emission control
- Compliance with **CPCB/GPCB Guidelines for Carcass Disposal.**

ANNEXURE - 2

C/1

Odour Control Action Plan for Storage and Incineration of Carcasses:**1. Objective**

To prevent, minimize, and control odour emissions arising from the storage and incineration of carcasses, ensuring that the surrounding atmosphere and nearby receptors are not adversely affected.

2. Scope

This action plan applies to all activities related to carcass receipt, handling, temporary storage, incineration, ash handling, and associated housekeeping within the facility.

3. Potential Sources of Odour

- Temporary storage of carcasses prior to incineration
- Handling and loading operations
- Leakage or spillage from containers

4. Odour Control Measures – Storage Area**4.1 Enclosed and Controlled Storage**

- Carcasses shall be stored only in a **designated, enclosed storage area** with restricted access.
- Storage containers shall be **leak-proof, corrosion-resistant, covered, and clearly labeled.**

4.2 Time and Temperature Control

- Storage duration shall be **kept to the minimum possible**, preferably less than 5 to 6 hours.
- If required, **chilled or refrigerated storage** shall be provided to retard decomposition and odour generation.

4.3 Ventilation and Air Treatment

- Storage areas shall be maintained under **negative pressure** to prevent odour escape.
- Exhaust air shall be routed through **odour control systems** such as bio-filters, activated carbon filters, or wet scrubbers.

4.4 Housekeeping and Disinfection

- Daily cleaning and disinfection of storage floors, containers, and handling equipment.
- Use of approved disinfectants and deodorizing agents.
- Immediate removal and cleaning in case of any spillage.

5. Odour Control Measures – Incineration Process**5.1 Efficient Incineration Operation**

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- Incinerator shall be operated at **design temperatures and residence time** to ensure complete combustion of carcasses.
- Continuous monitoring of temperature to avoid incomplete burning, smoke, and odour.

5.2 Air Pollution Control Devices (APCDs)

- Installation of appropriate APCDs such as **Secondary Combustion Chamber, Wet Scrubber, Venturi & Recirculation Tank.**
- All exhaust gases shall pass through APCDs before release to the atmosphere.

5.3 Stack Design and Dispersion

- We have kept Stack Height of 30 Meters which is required as per CPCB/GPCB Guidelines to ensure effective dispersion of treated flue gases.

6. Odour Control during Handling and Transportation (Within Facility)

- Carcasses shall be transferred quickly from storage to incinerator.
- Covered trolleys/containers shall be used at all times.
- Handling areas shall be washed and disinfected after each operation.

7. Preventive and Management Measures

- Strict prohibition of carcass accumulation beyond approved limits.
- Preventive maintenance of incinerator, APCDs, and ventilation systems.
- Availability of **odour neutralizing chemicals** for emergency use.

8. Monitoring and Inspection

- Regular odour surveillance in and around the facility boundary.
- Maintenance of inspection and cleaning records.
- Immediate corrective action in case of any odour complaint.

9. Training and Awareness

- All personnel involved shall be trained on odour control practices, hygiene, and emergency response.
- Refresher training shall be conducted periodically.

10. Complaint Redressal and Emergency Response

- A designated officer shall be responsible for addressing odour-related complaints.
- Any abnormal odour incident shall be recorded, investigated, and rectified immediately.
- This odour control action plan shall comply with CPCB/GPCB Guidelines.

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CPCB Incineration-Related Compliance Points (Carcass Disposal - Nov 2020)

1. Incineration as Preferred Disposal Option

- The guidelines *prioritize incineration* (as well as rendering) over other methods. Carcasses should be disposed of by incineration where facilities are available.

2. Infrastructure & Facility Availability

- **Municipal Authorities / Implementing Agencies** must ensure incineration facilities is established and available under their jurisdiction & we have Established the same.

3. Operated by Trained Personnel

- Incineration **must be practised on-site** only by **adequately trained manpower** equipped to operate the facility safely and in compliance with environmental norms & we are having the Team for the same.

4. Controlled Combustion with Air Pollution Controls

- Incineration should use **high-temperature combustion** to convert carcasses to inert gases and ash while deactivating pathogens.
- **Air pollution control devices** must be installed and approved by the pollution authority/CPCB to control emissions and protect air quality.

5. No Hazardous Accelerants

- Use of gasoline or other highly explosive accelerants is **explicitly prohibited** in incineration operations.

6. Fire/ Safety Preparedness

- Fire-fighting officials should be **notified** and included in planning; fire retardant equipment and protective gear will be available for all operators at Plant.

7. Pathogen Inactivation & Ash Handling

- Incineration must achieve **pathogen destruction and sterilization**, reducing carcasses to sterile ash. Handling and disposal of the ash must comply with related hazardous waste management and landfill rules where applicable.

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8. Environmental & Regulatory Oversight

- Operators must maintain **compliance records**, and the facility must operate according to applicable **CPCB/GPCB emission norms/standards** for thermal facilities (which include temperature and pollutant criteria for flue gas emissions, where applicable to incinerators as defined under general hazardous waste incineration standards).

9. Authorization & Monitoring

- Carcass incineration facilities should hold **authorization from respective State Pollution Control Boards (SPCBs)** and are subject to inspection and monitoring to ensure compliance with environmental rules.

- **Colour Code Categories (Applicable to Animal Carcass)**

Under the *Bio-Medical Waste Management Rules*, which GPCB enforces in Gujarat, different waste types are segregated at source using a standard colour coding.

✦ Yellow Category

Colour: Yellow

Types of Waste:

- Animal tissues, organs, body parts, carcasses, bleeding parts, fluids, blood
- Includes experimental animals and wastes from veterinary hospitals and institutions
- **Treatment/Disposal:**
- Incineration or deep burial (as per rules and authorized facility operations)
- **Application:**
- Stored in **yellow bags/containers** as part of biomedical waste segregation
- **Notes:**
- Deep burial of carcasses is permitted only in rural/towns with limited facilities (subject to regulatory approval and controls)
- **Summary:** Animal carcass waste is classified here and must be segregated in yellow coded containers for appropriate treatment/disposal.

1. Industrial Classification (Red/Orange/Green/White)

- GPCB categorizes *industries* (not waste types) by pollution potential: **Red** (high pollution), **Orange** (moderate), **Green** (low), **White** (negligible/no pollution).
- This classification is **not directly about waste colour codes**; it's about overall industrial pollution risk.

2. Waste Segregation and Colour Codes

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- Animal carcasses generated in healthcare or veterinary settings — is segregated using the **standard biomedical waste colour code** (Yellow, Red, Blue/White, Black) under national rules enforced by GPCB.
- **Animal carcasses are specifically assigned to the Yellow category** along with other anatomical waste.

Colour	Waste Included	Example Includes	Treatment
Yellow	Anatomical & animal waste	Animal carcasses, tissues, organs	Incineration / deep burial
Red	Contaminated recyclable materials	Tubing, plastic sets (recyclable)	Autoclave / microwaving
Blue/ White	Sharps & glass/metal implants	Needles, broken glass	Autoclave / sterilization
Black	Other solid biomedical waste	Discarded medicines (non-cytotoxic), other solid waste	Landfill (secured)

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Action Plan for Safe and Effective Waste / Carcass Collection and Transportation

1. Objective

To ensure the safe, hygienic, and environmentally compliant collection and transportation of waste and animal carcasses from the site to the designated disposal facility, minimizing health, safety, and environmental risks.

2. Scope

This action plan applies to all personnel, contractors, vehicles, and equipment involved in waste and carcass handling, collection, temporary storage, and transportation from the site to the approved disposal or treatment facility.

3. Roles and Responsibilities

- **Site Manager:** Overall supervision, compliance with regulations, and coordination with authorities.
- **HSE Officer:** Monitoring safety practices, PPE usage, and hygiene standards.
- **Collection Team:** Safe handling, loading, and securing of waste/carcasses.
- **Transport Supervisor:** Vehicle readiness, route management, and documentation.

4. Waste / Carcass Identification and Segregation

- Waste and carcasses shall be identified, classified, and segregated at the source.
- Carcasses will be handled separately from general waste.
- Only leak-proof, labelled, and covered containers shall be used.

5. Collection Procedures

- Collection shall be carried out on daily basis based on the calls received on the tollfree numbers or immediately upon identification of carcasses.
- Personnel will wear appropriate PPE (gloves, masks, boots, coveralls).
- Carcasses will be lifted using tools/equipment to avoid direct contact.
- Containers will be sealed immediately after loading.

6. Transportation Procedures

- Vehicles shall be dedicated, enclosed, leak-proof, and clearly marked.
- Vehicles will be disinfected before and after each trip.
- All the Collection Vehicles will be secured to prevent spillage during transit.
- Approved routes and disposal sites shall be used at all times.

7. Health, Safety, and Environmental Controls

- Handwashing and sanitation facilities will be provided for workers.
- No unauthorized personnel allowed during handling or transport.

~~118~~**8. Emergency and Incident Response**

- Kits will be provided all the workers in collection areas and vehicles.
- Corrective actions to be implemented and documented.

9. Training and Awareness

- All personnel involved shall be provided training on safe handling, maintaining hygiene, and emergency response.
- Refresher training to be conducted periodically.

10. Documentation and Monitoring

- Maintain records of collection, transport, disposal, and vehicle disinfection.
- Regular inspections and audits will be done to ensure compliance.

11. Spinkler Spray System

- To Control and Minimize any odour generated from the incineration plant, a sprinkler spray system has been installed. The system operates as and when required to suppress foul smell and maintain a hygienic and pollution-free environment in and around the plant premises.
- In order to prevent odour nuisance arising from the incineration process, an automatic sprinkler spray arrangement has been provided at the incineration plant. The spray system helps in neutralizing odour, reducing airborne pollutants, and ensuring compliance with environmental and safety norms.
- A sprinkler spray system has been installed at the incineration plant to control odour emissions. The system is activated whenever any smell is observed, thereby maintaining environmental hygiene.

12. Compliance

- This action plan shall comply with applicable local environmental, public health, and veterinary regulations and will be reviewed and updated on a Daily Basis.

ANNEXURE - 5

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Land Bearing Survey.No.2694 of Anand is Vested to Anand Mahanagar Palika for the purpose "slaughter house" Earlier, the facility at the said site was being used as a slaughter house as per approval of the local authority. In view of environmental protection, public health concerns, and scientific waste management requirements, the existing facility has now been upgraded and repurposed into a carcass incineration plant. The upgraded incineration facility is a common municipal infrastructure intended solely for the safe and scientific disposal of animal carcasses, and no slaughtering activity is presently carried out at the site. This upgradation ensures improved hygiene, prevention of disease transmission, and compliance with applicable environmental rules and regulations of the competent authorities.

The land possession documents indicate that the proposed site is designated for slaughter house usage as per the records of the local authority. The proposed carcass incineration facility is a common facility of the local government, intended exclusively for scientific and safe disposal of animal carcasses generated within the municipal limits.

As per the siting criteria and applicable rules and regulations of the local authority, slaughter house premises are permitted for allied activities related to animal waste handling and disposal. The proposed carcass incineration activity falls within the same category of usage and does not involve any change in land use.

Land Allocated to Anand Municipality by G.R.L.D.No.LUN/1771/40/1771/G. DATE: 14-03-1972.

Copy Enclose.

Plot/Lands Vested in to the Anand Municipality.

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It is respectfully submitted that the observations regarding the presence of pucca residential houses within a 500-meter radius of the proposed site have been examined in light of the **Central Pollution Control Board (CPCB) and State Pollution Control Board (SPCB) siting guidelines** and applicable statutory provisions.

Clarification:

1. CPCB Siting Guidelines

The CPCB, vide its document "Siting of Industries" (CPCB, 1995; revised and **adopted by SPCBs from time to time**), has prescribed that siting of projects shall be evaluated based on:

- o Nature and scale of the activity,
- o Pollution potential,
- o Availability of pollution control devices and mitigation measures.

The said guidelines **do not prescribe a blanket or mandatory 500-meter exclusion zone from residential areas** for all categories of projects.

2. Distance from Residential Areas

As per CPCB guidelines on siting of industries and projects:

"Siting criteria shall be applied on a case-to-case basis, considering pollution potential and mitigation measures, and mere presence of residential settlements in the vicinity shall not be a ground for rejection where adequate safeguards are provided."

Accordingly, the presence of residential clusters within a 500-meter radius **does not constitute a violation per se**, unless a **specific activity-based buffer distance is prescribed & plant is operating without following CPCB Guidelines**, which is not applicable in the present case our plant is designed as per CPCB Guidelines.

3. SPCB Adoption of CPCB Guidelines

The concerned SPCB follows CPCB guidelines issued under:

- o **Section 18(1)(b) of the Water (Prevention and Control of Pollution) Act, 1974**
- o **Section 16(1)(b) of the Air (Prevention and Control of Pollution) Act, 1981**

Under these provisions, SPCBs evaluate siting permissibility based on **land-use compatibility and environmental safeguards**, rather than on a fixed radial distance alone.

4. Residential Clusters Near the Site

- o Al Manan Residency, located on the western side of the proposed site

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Is existing, authorized residential developments, situated outside any notified prohibited or eco-sensitive zone, and do not fall within any statutorily restricted buffer distance under CPCB/SPCB norms for the proposed activity.

5. **Land Use and Planning Compliance**

The proposed site conforms to the approved Development Plan / Master Plan of the Municipal Corporation, and the proposed activity is permissible under prevailing zoning regulations, in compliance with CPCB siting principles.

6. **Environmental Safeguards**

In line with CPCB's "Guidelines for Environmental Management and Pollution Control", the project shall implement:

- o Adequate pollution control systems,
- o Noise, air, and water pollution mitigation measures,
- o Compliance with all conditions stipulated by SPCB while granting Consent to Establish / Operate.

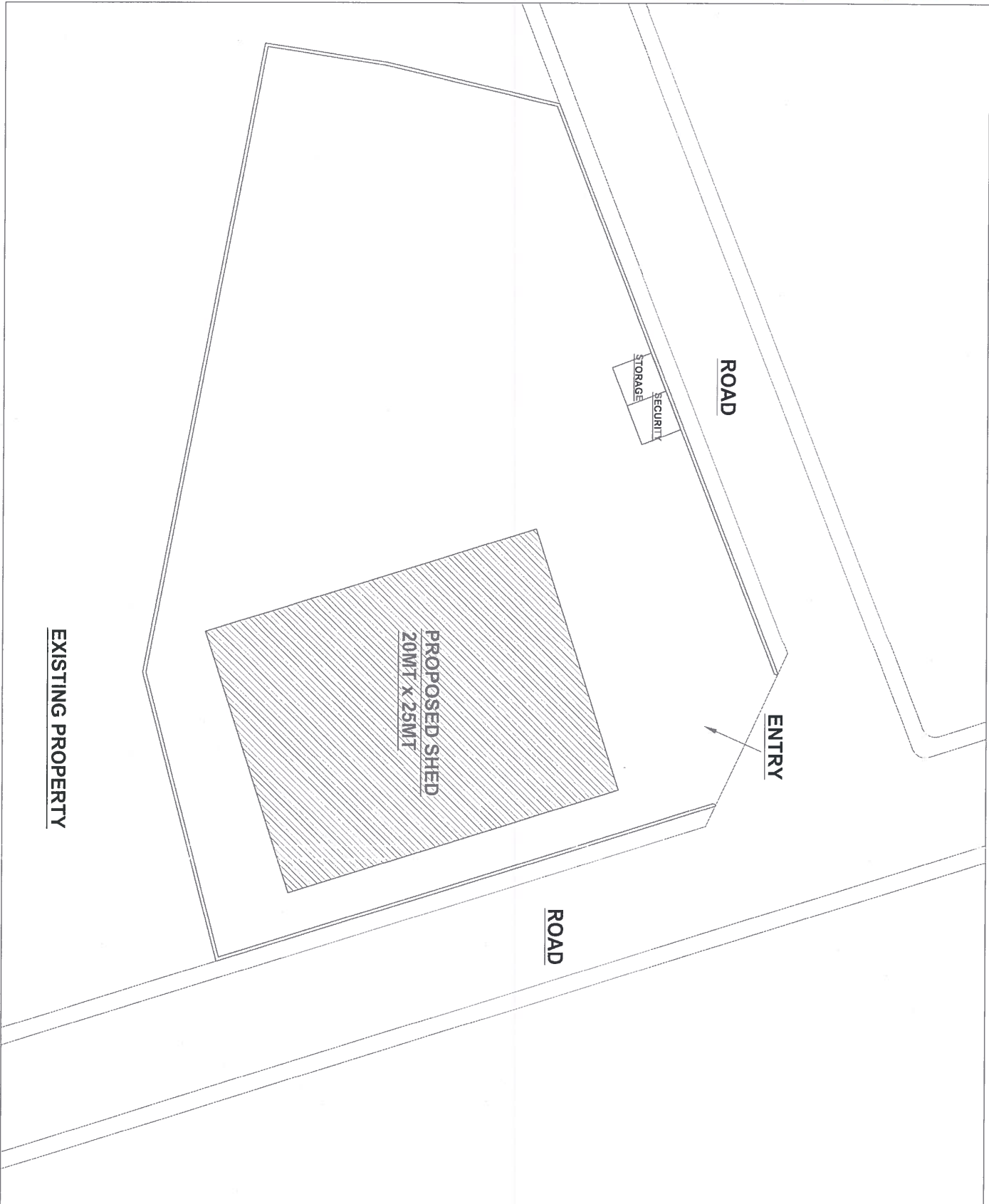
Conclusion

In view of the above and in accordance with:

- CPCB "Siting of Industries" Guidelines,
- SPCB siting and consent framework under the Water Act, 1974 and Air Act, 1981,

it is clarified that the presence of more than 15 pucca residential houses within a 500-meter radius does not violate CPCB/SPCB siting guidelines and does not render the site unsuitable for the proposed development.

Accordingly, the proposed site is found environmentally and legally compliant, and may be considered for grant of Environmental Clearance / Consent to Establish / Consent to Operate, subject to compliance with conditions imposed by the competent authorities.



<p>GENERAL NOTES:-</p> <ol style="list-style-type: none"> 1. ALL DIMENSIONS ARE IN METERS. 2. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 3. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 4. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 5. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 6. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 7. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 8. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 9. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 10. ALL DIMENSIONS ARE TO FACE UNLESS STATED OTHERWISE. 	
<p>ENGINEERS</p> <p>AT HARVAJ ENGINEERING</p> <p>CONSULTING ENGINEERS</p> <p>101, DAV STREET</p> <p>CHENNAI - 600 084</p> <p>INDIA</p> <p>CONTACT: TEL: 91-44-26666666</p> <p>FAX: 91-44-26666666</p> <p>EMAIL: info@harvaj.com</p>	
<p>SCALE</p> <p>1:100</p>	<p>DATE</p> <p>15/05/2023</p>
<p>PROJECT</p> <p>ANNEX R4</p>	<p>CLIENT</p> <p>ANNEX R4</p>
<p>TITLE</p> <p>ANNEX R4</p>	<p>DESIGNER</p> <p>ANNEX R4</p>
<p>PROJECT NO</p> <p>ANNEX R4</p>	<p>DATE</p> <p>15/05/2023</p>