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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, WESTERN ZONE
BENCH, AT PUNE.**

Original Application No.188 of 2024 WZ

Vishnu A Mori

.....} Applicant.

VERSUS

State of Gujrat & Others

.....} Respondents.

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For Respondent No. 5

Mishra
Authorized Signatory



**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, WESTERN ZONE
BENCH, AT PUNE**

Original Application No. 188 of 2024WZ

Vishnu A Mori

.....} Applicant.

VERSUS

State of Gujrat & Others

.....} Respondents.

Affidavit in Reply to Joint Committee Report in the OA No. 188 of 2024

I, Mishil Vinod Darji, Legal Manager of Shri Dutt India Private Limited, Age about 32 years, having its Corporate Office at 109, Arcadia Building, 195 Nariman Point, Mumbai - 400021, do hereby solemnly affirm and declare that this Affidavit is being submitted solely to present and record the true facts and circumstances in response to the joint committee report received by us, as detailed below:

1. I say & submit that the Original Application No.839 of 2024 (PB) was admitted by the Principal Bench of this Tribunal on a complaint made by the Applicant dated 07.11.2023 raising therein the issue pertaining to M/s Dutt India Pvt. Ltd. – Respondent No. 5, alleging that it had discharged chemical waste on the land behind its unit towards the main gate of another industrial unit namely, Sheel Oil and Fats Pvt. Ltd. without making Shri Dutt Private Limited a necessary respondent.
2. The Respondent No. 5 was not made necessary respondent in the Original Application No.839 of 2024 filed before the Hon'ble Principal Bench, NGT at New Delhi & was also not served with a copy of the Application No. 839 of 2024 filed before P.B. It is therefore prayed that the Applicant should make available copy of the said proceedings.
3. The Respondent – Industry would like to file its comments on the Joint Committee Report as below with a liberty to file a detailed reply to the then original application



filed by the Applicant & Additional Reply filed by the GPCB if any is made available subsequently to it.

3.1. That, I am the authorized representative of Respondent No. 5 and am well conversant with the facts of the case.

3.2. The Respondent-Industry has been established in the year 2023 by obtaining the following statutory permissions:

a) The First Consent to Establish/Operate had been granted to the unit. A copy of the said Consent to E/O is enclosed & marked as an **Annexure-R-1**.

b) The unit has now fully converted to a ZLD system and stopped discharging treated wastewater on land for gardening/plantation, thus addressing the requirements of the CC&A. The Amended consent Order from GPCB in this regard is attached as **Annexure-R-2**.

3.3. That, the present affidavit is being filed to categorically refute the baseless, fictitious, and exaggerated allegations made in the Original Application No. 188 of 2024 against M/s. Shri Dutt India Private Limited for environmental violations.

3.4. The Applicant, Vishnu A. Mori, a third-party has filed an Application against the State of Gujarat and Others regarding allegations for environmental violations. In the said, Application, allegations have been made against Respondent No. 5, M/s. Shri Dutt India Private Limited who operates an industrial unit located at Survey No. 137, 144 to 147, 149/1,2,3 Village Varsamedi, Taluka Anjar, District Kutch, Gujarat, engaged in the manufacturing of refined sugar by processing raw sugar.

4. The Applicant alleged that the Respondent No. 5 was discharging untreated wastewater on a parcel of land behind its premises, impacting the natural drain and the lake at Modwadar Village. The Applicant also alleged that the industry is violating environmental laws and discharging wastewater on land behind the premises of the unit towards the main gate of another unit, namely M/s Sheel Oil and Fats Pvt. Ltd. These allegations are completely unfounded and lack any



credible evidence. No complaints from any neighbouring industrial units, including M/s Sheel Oil and Fats Pvt. Ltd., have been reported to support such claims.

5. Pursuant to the order dated 02.09.2024, the National Green Tribunal (NGT) directed the formation of a Joint Committee, including officials from the District Magistrate's Office, Gujarat Pollution Control Board (GPCB), and Central Pollution Control Board (CPCB), to investigate the matter. Soon thereafter, the Joint Committee conducted a comprehensive inspection on 08.10.2024 and collected wastewater, soil, and water samples from multiple locations including from in, around and from a far-off place of the Respondent's sugar-refinery premises.
6. The Respondent operates under a Consolidated Consent & Authorization (CC&A) issued by GPCB, allowing it to generate 150 KLD of wastewater from industrial processes and 10 KLD from domestic use. The treated water is permitted to be used within the premises for gardening and plantation purposes.
7. The Respondent Industry has provided ETP consisting of Equalization Tank, Anaerobic Digester, Aerobic Treatment, and Tertiary Treatment. It has also provided adequate and suitable Air Pollution Control Devices with monitoring arrangements. It has also provided an Online Monitoring System. It utilizes its treated effluent after achieving standards for the disposal on land for Irrigation purpose/recycle/ reuse in the process to the extent possible and then dispose of it as per Consent granted to it.

8. FINDINGS OF THE JOINT COMMITTEE:

- 8.1. The Joint Committee noted that while there were temporary malfunctions in the Effluent Treatment Plant (ETP), immediate corrective actions were undertaken. It is pertinent to mention that the levels of pollutants found, including TSS, TDS, COD, BOD, chloride, and sodium, were momentary deviations and do not establish a pattern of environmental violation.
- 8.2. The Joint Committee's observation that the unit lacked proper flow measuring devices was immediately addressed. Advanced monitoring systems have now been installed to enhance wastewater generation, treatment, and disposal



tracking. The Committee also examined a natural drain and a well located in Survey No. 148, along with the lake in Modwadar Village, to assess contamination. The well water had high salt content, making it unfit for irrigation. Importantly, no direct discharge of wastewater into the drain or well was found during the inspection. The well is located at Survey No. 148 behind the unit near the natural drain, with a depth of about 20.0 meters. Plant leaves and other humus material were observed in the well. At present, the water of the well is not utilized for irrigation purposes as no crop is observed on the land of Survey No. 148. Therefore, the Respondent Industry is not at all responsible for any unfit quality of the said well. The Committee Report nowhere impose the said responsibility on the Respondent Industry.

8.3. Soil samples from Survey Nos. 148 and 150 showed signs of **past** wastewater discharge. However, no active discharge was observed at the time of inspection and it is critical to note that multiple industries operate in the vicinity. The findings do not conclusively attribute any contamination solely to the Respondent No. 5. Consequently, GPCB took regulatory action against the unit is not tenable in view of no specific linkage established about the pollution caused due to past discharges of various industries.

8.4. In light of the above, it must be noted that Respondent No. 5 complied in good faith, took immediate remedial action as soon as the issue was identified, rectifying the problem and meeting all required guidelines for resumption of operations.

8.5. No evidence of wastewater discharge from the unit was found on the land of Survey No. 148. Additionally, analysis of upstream and downstream drain samples showed no significant differences in characteristics, indicating the absence of industrial discharge in the drain. During the visit, no wastewater discharge from the unit into the drain was observed.

8.6. During the visit, the complainant stated that the unit was discharging its wastewater onto the land located at Survey No. 150. However, upon inspection, the committee members found **no signs** of wastewater discharge or



accumulation on the land. The entire area of the specified survey number was observed to be dry, with bushes growing on the land.

- 8.7. Soil monitoring revealed higher electrical conductivity (568, 1053, and 914 FS/cm), total organic carbon (8.1, 9.2, and 12.7 gm/kg), and organic matter (14.0, 15.8, and 21.9 gm/kg) in samples from Survey Nos. 148 and 150 compared to the reference sample (144 FS/cm, 1.8 gm/kg, and 3.0 gm/kg). While this suggests possible past wastewater discharge, it remains an observation with no conclusive evidence, especially given the presence of three industries in the vicinity.
- 8.8. During visits no industrial wastewater was observed to be discharged on the land of survey no. 148 & 150.
9. The Respondent No. 5 is one of the well reputed manufacturers and exporters of the Sugar Industry. That the Respondent No. 5 is into the Sugar Industry for over a decade and is well aware of the procedures, norms and process of running the Sugar business. Further, the main objective of Respondent No. 5 is not merely limited to successfully running the business but also to contribute towards the betterment of the society and environment, as a whole. The Respondent No. 1 is very well aware and has been consistently taking conscious measures in respect of its CSR as well as ESG responsibilities.
10. It is imperative to note that, the Respondent No. 5 has acquired this factory under the Insolvency and Bankruptcy Code, reviving an industrial unit that had remained non-operational for over five years. Ever since the Respondent No. 5 took over Uniworld Sugars Private Limited (Corporate Debtor) i.e. since 20.03.2023, the refinery situated at Survey No. 147 substantial investments have been made to enhance operations, environmental compliance, and local employment. Currently the factory employs over 350 workers and employees, supporting local livelihoods and contributing to the economic growth of the region, making its unjust closures highly detrimental to the local economy and to the business itself.



11. The Respondent No. 5 factory was monitored by the Board Officers on 06.10.2023 under the Water Act, 1974. During the Inspection, plant was not in operation and observed that:

QUOTE

1. No any pipeline from the boundary wall observed
2. No discharge of waste water observed within & outside the premises
3. No waste water ponding observed within & outside the premises
4. At adjacent farm, dry land is observed & no waste water pending observed at farm
5. Production activity & power plant are observed not in operation at site
6. The effluent treatment plant is observed not in operation. During Inspection, neither generation nor disposal of waste water is observed
7. No flexible pipeline is observed at ETP
8. Contaminated soil is observed stored under the storage shed within premises, as per record, unit had collected contaminated soil approx. 20MT.
9. At present, Unit has not started remediation work activity. Unit is instructed to submit action plan/undertaking for carrying out remediation work.

UNQUOTE

The Respondent No. 5 herein complied with all the compliances.

12. In response to the observations and remedial measures suggested by the Joint Committee, the Central Pollution Control Board (CPCB) issued a letter dated 26.12.2024 to the Gujarat Pollution Control Board (GPCB) requesting an updated status of actions/measures taken. In this regard, the point-wise compliance made by the unit is attached as **Annexure- R-3**.

13. PRAYER

The foregoing clearly denotes that our industry has never willfully violated the stipulations and guidelines from the State Pollution Control Board, and on their own have proposed and implemented the Zero Discharge Scheme, to avoid any



misconception in the matter. Further, we have got amended the Consent to this effect, confirming the technolegal status.

That any violation that may have occurred earlier was unintentional; therefore, we request that no penal action be taken. We, for our part, assure you that we will fully comply with our commitment to the environment.

That the Respondent No. 5 craves the liberty of this Hon'ble Tribunal to submit further information as and when required.

Solemnly affirmed on this 21st Day of March, 2025 at Mumbai.

For the Respondent No. 5



Affiant



(Mishil Vinod Darji)

Authorized Signatory

VERIFICATION

I, Mishil Vinod Darji, Legal Manger of the Respondent No. 5 hereby state that the contents of the above paragraph Nos. 1 to 13 are true and correct to the best of my knowledge & belief.

Dated this 21st day of March, 2025 at Mumbai.



Authorized Signatory

BEFORE ME

Adv. Shivaji N. Dhanage
Notary Govt Of India
Regd. No. 15376 MUMBAI (MS)
404-405, 4th Floor, Davar House,
197/199, Near Central Camera Bldg.
D.N. Road, Fort, Mumbai - 400001.
Mob.: 8591897834

NOTED & REGISTERED

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Dated. 21 MAR 2025.

6. Unit shall obtain fresh water from valid source have permission of the complete authority.
7. Industry shall strictly comply with the coal handling guideline of the Board.
8. Industry shall provide dedicated storage silo for storage of fly ash & ash shall be dispose off as per fly ash notification 1999 & as amended from time to time.
9. Industry shall dispose of fly ash as per CPCB guideline dated 28/08/2019 maintain complete records of fly ash generation and its disposal.
10. Industry shall take adequate measures to control fugitive emission due to storage, handling & transportation of coal, fly ash & solid waste etc.
11. Industry shall manage Solid Wastes generated from industrial activities as per Solid Waste Management Rules-2016 (solid waste as defined in Rule-3(46)).
12. As per Provisions of Rule 18 of Solid Waste Management Rules-2016 you are directed to make an arrangement in Utilities to replace at least five percent (5%) of your solid fuel requirement by 'refused derived fuel'.

3. CONDITIONS UNDER THE WATER ACT:

- 3.1 Source of Water: - GWIL.
- 3.2 The quantity of the fresh water consumption for industrial purpose shall not exceed 780 KL/Day.
- 3.3 The quantity of the fresh water consumption for domestic purpose shall not exceed 10 KL/Day.
- 3.4 The quantity of the industrial effluent to be generated from the industrial plant and other ancillary industrial operations shall not exceed 150 KL/Day.
- 3.5 The quantity of domestic waste water shall not exceed 10 KL/Day.
- 3.6 Industry shall operate Effluent Treatment Plant (ETP) adequately so that treated industrial effluent shall comply with following norms:

| PARAMETERS | PRESCRIBED LIMITS |
|--------------------------------|-------------------|
| pH | 6.5 to 8.5 |
| Temperature | 40°C |
| Colour (Pt.Co. scale) in units | 100 units |
| Total Suspended Solids | 100 mg/L |
| Oil and Grease | 10 mg/L |
| Ammonical Nitrogen | 50 mg/L |
| BOD (3 days at 27o C) | 30 mg/L |
| COD | 100 mg/L |
| Chlorides | 600 mg/L |
| Sulphates | 1000 mg/L |
| Total dissolved solids | 2100 mg/L |
| Percent Sodium | 60 % |
| Phenolic Compounds | 1 mg/L |
| Sulphides | 5.0 mg/L |
| Sodium Absorption Ratio | 26 |



Outward No: 756366

PH





GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152

- 3.7 Treated effluent confirming to above standards shall be discharged on land for gardening / plantation purpose within premises.
- 3.8 Industry shall provide fixed pipeline network with flow meter for even distribution of treated effluent and maintain its record.
- 3.9 Domestic effluent shall be disposed off through septic tank/soak pit system.
- 3.10 Disposal system for storm water shall be provided separately. In no case storm water & sewage from port facility shall not be discharge into surface water.

4. Conditions under the Air Act-1981:

4.1. The following shall be used as a fuel in AFBC Boiler:

| Sr. No. | Utility | Name of Fuel | Quantity |
|---------|-------------|---------------|----------|
| 1. | AFBC Boiler | Lignite/ Coal | 276 MTD |

4.2. The applicant shall install & operate air pollution control system efficiently in order to achieve prescribed norms.

4.3. The flue gas emission through stack attached to AFBC Boiler shall conform to the following standards;

| Sr. No. | Stack attached to | Stack height | APCM | Parameter | Permissible Limit |
|---------|----------------------|--------------|----------------|--|---|
| 1 | AFBC Boiler (70 TPH) | 60 m | ESP + Scrubber | PM SO ₂ NO _x | 150 mg/NM ³ 100 ppm 50 ppm |

4.4. There shall be no process gas emission from manufacturing process and other ancillary operations.

4.5. The concentration of the following parameters in the ambient air within the premises of the industry shall not exceed the limits specified hereunder as per National Ambient Air Quality Standards issued by MoEF & CC dated 18th November-2009. In addition to following parameters industry shall also carry out AAQ monitoring of all other applicable parameter as per MoEF notification dated 18/11/2009 and submit the report to the Board.

| Sr. No. | Pollutant | Time Weighted Average | Concentration in Ambient air in µg/M ³ |
|---------|---|-----------------------|---|
| 1. | Sulphur Dioxide (SO ₂) | Annual 24 Hours | 50 80 |
| 2. | Nitrogen Dioxide (NO ₂) | Annual 24 Hours | 40 80 |
| 3. | Particulate Matter (Size less than 10 µm) or PM ₁₀ | Annual 24 Hours | 60 100 |
| 4. | Particulate Matter (Size less than 2.5 µm) or PM _{2.5} | Annual 24 Hours | 40 60 |

4.6. The applicant shall provide portholes, ladder, platform etc. at chimney(s) for monitoring the air emissions and the same shall be open for inspection to/and for use of Board's staff. The chimney(s) vents attached to various sources of emission shall be designed by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.

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GUJARAT POLLUTION CONTROL BOARD

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3. The persons authorized shall not rent, lend, sell, and transfer or otherwise transport the hazardous wastes without obtaining prior permission of the Gujarat Pollution Control Board.
4. Any unauthorized change in personnel, equipment or working conditions as mentioned in the authorization order by the persons authorized shall constitute a breach of this authorization.
5. The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
6. The person authorized shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Wastes and Penalty"
7. It is the duty of the authorized person to take prior permission of the Gujarat Pollution Control Board to close down the facility.
8. An application for the renewal of an authorization shall be made as laid down in rules 6(2) under Hazardous and Other Waste Rules, 2016.
9. The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
10. The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
11. The hazardous and other wastes which gets generated during recycling or reuse or recovery or pre-processing or utilization of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorization.
12. The importer or exporter shall bear the cost of import or export and mitigation of damages if any.
13. Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Change or Central Pollution Control Board from time to time.
14. The waste generator shall be totally responsible for (i.e. collection, storage, transportation and ultimate disposal) the wastes generated.
15. Records of waste generation, its management and annual return shall be submitted to Gujarat Pollution Control Board in Form-4 by 30th day of June of every year for the preceding period April to March.
16. In case of any accident, details of the same shall be submitted on Form-11 to Gujarat Pollution Control Board.
17. As per "Public Liability Insurance Act-91" company shall get Insurance Policy, if applicable.
18. Empty drums and containers of toxic and hazard material shall be treated as per guideline published for "Management & Handling of discarded containers". Records of the same shall be maintained and forwarded to Gujarat Pollution Control Board regularly.
19. In case of transport of hazardous wastes to a facility for (i.e. treatment, storage and disposal) existing in a State other than the State where hazardous wastes are generated, the occupier shall obtain 'No Objection Certificate' from the State Pollution Control Board or Committee of the concerned State of Union Territory Administration where the facility exists.



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17/10/2023

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20. Unit shall take all concrete measures to show tangible results in waste generation, reduction, avoidance, reuse and recycle. Actions taken in this regard shall be submitted within three months and also along with Form-4.
21. Industry shall have to display the relevant information with regards to hazardous waste as indicated in the Hon. Supreme Court's Order in W.P. No.657 of 1995 dated 14th October, 2003.
22. Industry shall have to display on-line data outside the main factory gate with regard to quantity and nature of hazardous chemicals being handled in the plant, including wastewater and air emissions and solid hazardous wastes generated within the factory premises.

6. SPECIFIC CONDITIONS:-

- 6.1 The authorized actual user of hazardous and other wastes shall maintain records of hazardous and other wastes purchased in a passbook issued by the State Pollution Control Board along with the authorization.
- 6.2 Handling over of the hazardous and other wastes to the authorized actual user shall be only after making the entry in the passbook of the actual user.
- 6.3 In case of renewal of authorization, a self-certified compliance report in respect of effluent, emission standards and the conditions specified in the authorization for hazardous and other wastes shall be submitted to SPCB.
- 6.4 The occupier of the facility shall comply Standard operating procedure/guidelines published by MOEF&CC or CPCB or GPCB from time to time.
- 6.5 Unit shall comply provisions of E-Waste Management Rules-2016.
- 6.6 The disposal of Hazardous Waste shall be carried out as per the waste Management hierarchy.
- 6.7 The occupiers of facilities shall not store the hazardous and other wastes for a period not exceeding ninety days. Prior permission of the Board shall be obtained for extension of the storage period.
- 6.8 The occupier shall maintain the records of generation, sale, storage, transport, recycling, co processing and disposal of hazardous waste and make available during the inspection.
- 6.9 The transportation of the hazardous waste shall be carried out in GPS mounted dedicated vehicles.

7. GENERAL CONDITIONS:-

- 7.1 Any change in personnel, equipment or working conditions as mentioned in the consents form/order should immediately be intimated to this Board.
- 7.2 Applicant shall also comply with the general conditions given in annexure I.
- 7.3 Whenever due to accident or other unforeseen act or ever, such emissions occur or is apprehended to occur in excess of standards laid down such information shall be forthwith reported to Board, concerned Police Station Office of Directorate of Health Services, Department of Explosives, Inspectorate of Factories and local body.
- 7.4 In case of failure of pollution control equipments, the production process connected to it shall be stopped. Remedial actions/measures shall be implemented immediately to bring entire situation normal.
- 7.5 The Environmental Management Unit/Cell shall be setup to ensure implementation and monitoring of environmental safeguards and other conditions stipulated by regulatory authorities. The Environmental Management Cell/Unit shall directly report to the Chief Executive of the organization and shall work as a focal point for

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(Handwritten signature)





GUJARAT POLLUTION CONTROL BOARD

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

- internalizing environmental issues. These cells/units also coordinate the exercise of environmental audit and preparation of environmental statements.
- 7.6 The Environmental audit shall be carried out yearly and the environmental statements pertaining to the previous year shall be submitting to this State Board latest by 30th September every year.
 - 7.7 The Board reserves the right to review and/or revoke the consent and/or make variations in the conditions, which the Board deems, fit in accordance with Section 27 of the Act.
 - 7.8 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.
 - 7.9 Industry shall have to display the relevant information with regard to hazardous waste as indicated in the Hon. Supreme order in w.p. no. 657 of 1995 dated 14th October 2003.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD


(T.C. Patel)
Unit Head

NO: PC/CCA-Kutch-836(2)/ GPCB ID-29438/

Date:-17/10/2023

Issued to:
M/s. Shri Dutt India Private Limited (New Name),
M/s. Unlworld Sugers Limited (Old Name),
Survey No.137, 144 to 147,149/1, 2 & 3,
Village: - Varsamedj, Tal: Anjar,
Dist: Kutch - 370 110.



Outward No: 756366, 17/10/2023

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Annexure- R-2

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152

CCA-Amendment
(WH-139742)

No. PC/CCA-KUTCH- 836(5)/ GPCB ID-29438/

Date: /01/2025

To,
M/s. Shri Dutt India Private Limited,
(Old name: Uniworld Sugars Limited)
Survey no. 137,144 to 147, 149/1, 2 & 3,
Vill: Varsamedi, Tal: Anjar,
Dist: Kutch – 370 110.



SUB: Amendment in the consolidated consent & Authorization of the Board.

REF: 1) CCA issued by this office vide order no. **AWH- 129759** dated 17/10/2023.
2) CTE-Amendment issued by this office vide order no. 138199 dated 11/11/2024.
3) Your CCA Amendment Application Inward ID No. **323195** dated **13/11/2024**.

In exercise of the power conferred under section-25 of the Water (Prevention and Control of Pollution) Act-1974, under section-21 of the Air (Prevention and Control of Pollution)-1981 and Authorization under rule 6(2) of the Hazardous And Other Waste (Management and Transboundary) Rules, 2016 & framed under the Environment (Protection) Act-1986, The Board has granted CCA vide order No. **AWH- 129759** issued vide order no. PC/CCA-KUTCH-836(2)/GPCB ID-29438/756366 dated 17/10/2023.

The Board has right to review and amend the conditions of the said CCA and its amendment orders. Now, considering your application for CCA amendment inward ID No. **323195** dated **13/11/2024**, the said CCA order is amended as below:

1. The order shall be read as CCA amendment Order No.: WH- 139742 Date of Issue: 16/01/2025, valid up to 18/03/2025.
2. There shall be no change in existing production & its capacity, raw material consumption, fuel consumption, flue gas emission & process gas emission stacks, due to CCA Amendment.

SUBJECT TO THE FOLLOWING SPECIFIC CONDITIONS:

1. Industry shall not carry out any activity which may attract the applicability of EIA notification-2006 & its amendment.
2. Industry shall renew Public Liability Insurance Policy time to time & submit a copy of the same to this office.
3. No ground water shall be withdrawal without prior permission from CGWA as per Hon'ble NGT order.
4. Unit shall obtain fresh water from valid source have permission of the competent authority.
5. Industry shall manage Solid Wastes generated from industrial activities as per Solid Waste Management Rules-2016 (solid waste as defined in Rule-3(46)).

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6. Industry shall comply with circular of the Board dated 27/08/2021 regarding retrofitting of emission control/ equipment in D.G. Set of capacity 125 KVA and above as per system & procedure for emission compliance testing of Retrofit Emission Control Devices (RECD) for D.G. Set issued by CPCB dated 01/02/2022 at the earliest and submit compliance.

3. The condition no. 3 of the said CCA is amended as below:

- 3.1 Water Source: - GWIL.
- 3.2 The quantity of total water consumption for industrial purpose shall be increased from 780 KL/Day to 932.8 KL/Day, due to CCA-Amendment [Fresh: 590 KL/Day + Reuse: 342.8 KL/Day (164 KL/Day Permeate from wash Recovery RO System + 58 KL/Day Permeate from BRS plant + 120.8 KL/Day RO Permeate & MEE condensate from ETP)].
- 3.3 The quantity of industrial wastewater to be treated in the ETP shall be decreased from 150 KLD to 122 KLD, due to CCA-Amendment.
- 3.4 Out of total industrial effluent 122 KLD, about 80 KLD shall be subjected to ETP, followed by two stage RO, RDRO, MEE & ATFD. Remaining 42 KLD including reject from RO & wash recovery system shall be directly subjected to RDRO system. RO permeate & MEE condensate (120.8 KLD) shall be reused back in process. Reject from MEE shall be subjected to ATFD, to achieve Zero Liquid Discharge.
- 3.5 There shall be no change in existing quantity of domestic water consumption (10 KL/Day) and domestic waste water (sewage) (10 KL/Day), due to CCA Amendment.
- 3.6 Domestic effluent shall be disposed off through septic tank/soak pit system.
- 3.7 Disposal system for storm water shall be provided separately, in no circumstances storm water shall be mixed with the industrial effluent in any case

4. The condition no. 5.2 of the said CCA is amended as below:

5.2 M/s. Shri Dutt India Private Limited is hereby granted an authorization based on the enclosed signed inspection report for generation, collection, treatment, storage, transport of hazardous waste on the premises situated at Survey no. 137,144 to 147,149/1,2&3, Vill: Varsamedi, Tal: Anjar, Dist: Kutch;

| Sr. No. | Waste | Quantity per Annum | | Schedule & Category | Facility |
|---------|------------------------------|--------------------|---------------------|---------------------|--|
| | | Existing | After CCA-Amendment | | |
| 1. | Used / Spent Oil | 0.5 MT | 0.5 MT | I-5.1 | Collection, storage, Transportation, and disposal by selling out to registered recycler/ reuse as a lubricant. |
| 2. | Discarded Drums & Containers | 3 MT | 3 MT | I-33.3 | Collection, Storage, Transportation and disposal by selling to authorized decontaminator. |

Outward No: 85395/07/02/2025

(Signature)





GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152

| | | | | | |
|----|--------------------------|--------|--------|--------|--|
| 3. | Concentrated Brine Salt | 750 MT | Nil | I-33.2 | Removed |
| 4. | ETP Sludge | 500 MT | 940 MT | I-34.3 | Collection, storage, Transportation, and disposal at TSDF / Co-reprocessing/ pre processing.. |
| 5. | Spent Ion Exchange Resin | 30 MT | 30 MT | I-34.2 | Collection, storage, Transportation, and disposal by selling out to registered recycler/ CHWIF/ Co-reprocessing/ pre processing. |

5. Rest of conditions of Consolidated Consent & Authorization (CC&A) order No: **AWH-129759** issued vide order no. PC/CCA-KUTCH-836(2)/ GPCB ID-29438/756366 dated 17/10/2023 shall remain unchanged and industry shall comply with the same judicially.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD


(T. C. Patel)
Unit Head



Outward No.: 853295, 07/02/2025

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Annexure- R-3

| S. No. | OBSERVATION BY COMMITTEE | COMPLIANCE |
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| I | Observation Regarding E.T.P. | |
| 1) | During visit ETP and Multi Effective Evaporator (MEE) of 2.2 Cum/Hrs Capacity was operational. | As per Observation |
| 2) | Floating scum was observed in Primary settling tank and Buffer Tank of ETP and dosing of chemical was not observed in flash mixer during the visit. | Since we had seggregated the CIP effluent to ETP, the inorganics formed a scum on the surface. |
| 3) | Secondary Clarifier of ETP was observed in idle condition and adequate biomass was not observed in aeration tank of ETP. | We have two secondary clarifiers, and one of them was under scrapper repairs. Since mainly inorganic effluent is there, the biomass develops in low concentration. |
| 4) | Moreover, it was observed that ETP was not operated in scientific manner. | There was a transition from predominant organic to inorganic grade effluent. |
| 5) | The analysis results of the grab samples of treated effluent collected from the outlet of ETP reveals that concentration of TSS, TDS, COD, BOD, Color, Chloride, % sodium, SAR & pH grossly exceeding the discharge norms a prescribed in CC & A. | During Committee visit, the Zero Discharge Scheme was already in effective operation and as such the discharge standards are not applicable. |
| 6) | The analysis results of the grab sample collected from inlet (Equalization Tank) of ETP reveals that concentration of TSS, TDS, COD, and BOD is observed very high. | This was the effluent stored for partial capacity treatment during the above transition and no discharge was made from this. |
| 7) | Unit is not maintaining the record in logbooks of waste water generated from various streams. Also unit has not installed flow measuring devices at the inlet of ETP and outlet of ETP to assess the exact quantity of waste water generated, treated at ETP and disposed. | We have now installed flow meters for individual streams as well as for inlet and outlet of ETP, which is internal re-circulation. |
| 8) | Unit has installed three stage Multi Effective Evaporator (MEE) of 2.2 Cum/Hrs capacity to treat the concentrate generated from Rinse Water Recovery system & Brine recovery system. However, unit is not maintaining the record in logbook for operation of MEE and quantity of waste water fed to MEE. | During the visit, the MEE trial was operational, with the designed flow, which was measured at Reject of Disc Membrane System provided. |
| 9) | It is gathered that MEE concentrate is stored in Tank and transferred to | We have installed ATFD mechanism for conversion of MEE concentrate to |



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| | equalization tank of ETP for further treatment. | powder form. |
| 10) | During visit, it was informed by the unit that treated waste water from ETP is fed to RO of capacity 10 Cum/hr for tertiary treatment to use in the process. However, during visit, it is observed that the network of pipelines was also connected from tertiary feed treated water storage tank of ETP to the discharge line on land for gardening/ plantation purpose within the premises of the unit along with the feed to RO System. | We have now disconnected all the pipelines leading to disposal network, since the zero discharge scheme has started functioning |
| 11) | Unit is not maintaining the record of quantity of treated waste water fed to RO system for tertiary treatment and how much quantity of treated waste water is discharge on land for gardening purpose as per CC&A condition. | As above, now no water from ETP is going to gardens. |
| II Conclusion And Recommendations: | | |
| 1) | It is observed from the analysis results that ETP is not adequate for the treatment of waste water as the concentration of analysed parameters namely TSS, TDS, COD, BOD, Color, Chloride, % sodium and SAR grossly exceeds the discharge norms as prescribed in CC&A. Unit has not provided flow measuring devices at the inlet and outlet of the ETP to assess the exact quantity of waste water generated, treated in ETP and discharge on land as per conditions laid down in CC&A | There is now only CIP effluent containing inorganics mainly going to ETP, in much lesser quantity than consented. This too, after treating for organic entrainment if any, is subjected to R.O. and reuse. Meters are now provided for inlet and outlet. |
| 2) | Unit has installed three stage MEE 2.2 Cum/Hr capacity and RO system for tertiary treatment to use in the process. However, unit is not maintaining he record of operation of MEE and RO system in log books. | During the visit, the MEE trial was operational, with the designed flow, which was measured at Reject of Disc Membrane System provided. |
| 3) | Joint committee collected water samples from well, natural drain and lake located at Modwadar village. The analysis results of samples collected from well reveals higher concentration of salts in the samples and indicates the medium quality of water for irrigation purpose as per standard is guidelines for irrigation water. It is gathered | We have explained to the Honourable Committee Members during the visit that the contour levels and topography does not make it possible for any discharge if anyfrom our premises, to reach the Modwadar Village or the lake mentioned. Further, we had enough land for disposal so that there was |




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| <p>that at present the well water is not used for irrigation purpose and no crop was observed on the land of survey no. 148. The analysis results of the sample collected from the lake located at Modwadar village reveals that monitored parameters TDS and chloride shows higher concentrations as compared with the acceptable limit of drinking water standards of IS 10500 : 2012 which make it unfit for drinking purpose though the monitored parameters namely pH, color, sulfate, sulphide, phenolic compound and Ammonical nitrogen are meeting the acceptable limit of IS standard 10500:2012 for drinking water. During visit discharge of waste water was not observed in the lake. The soil samples were collected at 03 locations from the land of survey no. 148 and 150 and one sample was collected for reference purpose. In all three locations Electricity conductivity, Total organic carbon and Organic matter were observed higher as compared to reference sample collected during the visit which indicates that waste water discharge may have happened in the past on the land. During visit discharge of waste water was not observed in area under all allegation. Summarily, the unit was found to be in gross violation of norms prescribed for treated waste water. Further, the unit failed to provide and maintain suitable mechanism for complete water budget by the way of provision of flow meters and maintenance of their logbooks at critical water, waste water and treated waste water streams. It is also found that concentration of certain parameters in the soil of area under question are more than the sample of reference location. Therefore, impact of application of treated/partially treated/untreated waste water in past cannot be ruled out though there was no direct discharge on land under question observed by the joint committee during visit.</p> | <p>absolutely no discharge of either untreated or treated effluent from our site, as the committee has rightly observed. To counter any false allegation, we ourselves submitted and executed fully the plan to upgrade E.T.P. to 'Zero Discharge' level by adopting state of art mechanisms like Advanced BRS System, Upgraded RWRS System, Disc Membrane System, MEE and ATFD to achieve this and executed the same in record time. We also insisted on amending our consent to Zero Discharge, which shows clearly our intentions.</p> |
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| III | Based on the above observations following remedial actions are required to be taken by the unit. | |
| 1) | Submit the detailed time bound action plan for upgrade the ETP so that treated effluent can meet the discharge norms as prescribed in CC&A. | As said above, we not only submitted, but executed the plan for 'Zero Discharge' which was in operation during committee visit. |
| 2) | Segregate the stream of waste water of high COD and high TDS from general waste water stream to give specific treatment process for different streams. | Already stream segregation and selective treatment is carried out. |
| 3) | Install flow measurement devices at strategic locations of waste water generation like waste water streams generated from the process and at inlet of ETP and final out let of ETP to assess the exact quantity of waste water generated, treated and disposed and maintain the record in logbook for the same. | As per guideline, flow meters are installed. |
| 4) | Maintain the record of operation of MEE in logbook and explore the mechanism for treatment of MEE concentrate generated during the operation of MEE. | The logbook is generated and records kept. |
| 5) | Dispose the ETP sludge stored in the ETP premises scientifically. | We have already entered into agreement with CHWTSDF agency and already dispatched the sludge stored at our site to them for further treatment. |
| 6) | Provision of adequate land area to cater the requirement of discharge of treated effluent for gardening/ plantation purpose as prescribed in CC&A. | Since, we have switched over to Zero Discharge Method; no effluent discharge is on any land. |
| 7) | Install piezo wells as per water gradient in the area for assessing the ground water quantity as the unit is permitted to discharge the treated effluent on land after providing required treatment as prescribed in CC&A. A Study for assessing the impact of discharge of treated industrial waste water on land considering saline zone impact on the quality of ground water and soil may be carried out in time bound manner by institute of repute (IOR). Accordingly, condition of discharge of treated waste water on land considering the land availability, impact on ground water quality and adequacy of ETP may also be | As said above, there is complete stoppage to disposal on land. |



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| | relooked by GPCB w.r.t. CC&A. | |
| 8) | It is appraised by the member of the committee from GPCB that for the purpose of upgradation of ETP with change of disposal mode for treated effluent from application on open land for plantation/gardening to ZLD & change in industrial water consumption and waste water generation, the unit has obtained CTE amendment. The unit submitted compliance report w.r.t. to noncompliance observed by GPCB team during visit on 04.09.2024 and 13.09.2024. Subsequently, GPCB team visited the unit on 13.11.2024 and based on compliance status GPCB revoked the closure direction vide order no. PC/CCA-KUTCH-836(4)/GPCB-ID-29438/826936 dated 16.11.2024 (Annexure-5) subject to the following conditions: | The observation of the committee endorses our submissions above and our efforts in the 'Environmental Management'. It also indicates our submission that we have never willfully violated any Environmental provision and direction, and have gone a step further in imposing on ourselves the 'Zero Discharge' condition and implemented the same swiftly, which also shows our willingness to preseve Environmental Safety. |
| A) | Unit shall strictly adhere to ZLD & in no case effluent shall be disposed off outside the premises. | We are strictly adhering to the 'Zero Discharge' solution. We have implemented. |
| B) | Unit shall operate ETP regularly and efficiently for treatment of effluent and maintain its record. | We are also operating the ETP for the small quantity effluent, further being subjected to RO for 'Zero Discharge' |
| C) | Unit shall abide with orders/directions issued by Hon'ble NGT in the matter O.A. No. 839 of 2024. | We are abiding by the directions mentioned. |
| IV | Further in light of observations and remedial measure suggested by the joint committee, Central Pollution Control Board issued a letter dated 26.12.2024 to the Gujarat Pollution Control Board (GPCB) regarding latest updated status of action/measures taken/initiated by GPCB. Copy of the letter is attached at annexure- 6 . In reply to the said letter, GPCB has submitted latest point-wise status of remedial measures suggested/opined by the joint committee. Copy of the latest status of measures taken/ initiated as submitted by GPCB is attached at annexure-7 and summarized as below: | As per the Observation. ---  |



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| 1) | Subsequent to the visit of joint committee, GPCB inspected the unit on 13.11.2024 and 16.12.2024. | --- |
| 2) | It is observed from the latest status report submitted by GPCB that waste water treatment related issues like upgradation of effluent treatment plant (ETP) for ZLD, segregation of high TDS/high COD waste water streams, installation of flow measuring devices at strategic locations of waste water generation and treatment system and maintaining the records of the same in logbooks etc. have been addressed by the unit. | The observations by GPCB substantiates our submissions above and indicate that we have implemented all the measures stipulated. |
| 3) | Issue of provision of adequate land area to cater the requirement of treated wastewater discharge on land for gardening/plantation purpose as prescribed in CC&A has been addressed as the unit now converted to ZLD (copy of CTE amendment for the same is enclosed at annexure-8 for reference) and stopped the discharge of treated waste water on land. | As per observation. |
| 4) | Issue of disposal of stored ETP sludge (about 70 MT to the common hazardous waste treatment stabilization and disposal facility (CHWTSDF) is yet to be fully complied and needs to be done in expeditious manner. | We have already entered into agreement with CHWTSDF agency and already dispatched the sludge stored at our site to them for further treatment. |
| 5) | For installation of piezo well, it is submitted that industry has converted to ZLD unit and stopped discharging the treated waste water on land. However, GPCB will carry out a study of ground water and soil for assessing the impact of discharge of treated/partially treated waste water on land in past and take suitable actions. | As per observation. |
| 6) | The disposal of stored ETP Sludge in the premises of the Unit in expeditious manner and study of ground water and soil quality required to be ensured by GPCB with continuation of regular surveillance activity from time to time for compliance verification and further measures whenever and wherever required. | As submitted above, the sludge is already dispatched to CHWTSDF agency. |

